

Self-Evaluation Report

April 2021

The report is published under the terms and conditions of the [Creative Commons Attribution-Share Alike 2.0](#) license: you may freely copy, distribute or alter content, provided that you give credit to the original author and publish the (altered) content under the same terms and conditions.

European Quality Assurance Register for Higher Education (EQAR)
Aarlenstraat 22 rue d'Arlon
1050 Brussels
Belgium

<http://www.eqar.eu/>
info@eqar.eu

Phone: +32 2 234 39 11

Table of Contents

List of figures and tables.....	4
Glossary.....	5
1. Introduction.....	6
1.1 Background.....	6
1.2 Objectives of the self-evaluation and external evaluation.....	6
1.3 Self-evaluation process.....	7
1.4 How EQAR evolved since the 2010/11 evaluation.....	9
2. How EQAR is organised.....	10
2.1 Organisational structure and membership.....	10
2.2 Independence.....	13
2.3 Strategy, activities and quality assurance.....	14
2.4 Resources.....	16
3. How EQAR manages the Register.....	18
3.1 Applications for registration.....	18
3.2 Consideration of internal quality assurance.....	20
3.3 Designing methodologies fit for purpose.....	20
3.4 Implementing processes.....	23
3.5 Peer-review experts.....	25
3.6 Criteria for outcomes.....	26
3.7 Reporting.....	28
3.8 Complaints and appeals.....	28
4. How EQAR contributes to the EHEA – Transparency and Information.....	30
4.1 Database of External Quality Assurance Results (DEQAR).....	30
4.2 Analyses based on Register Committee decisions and agencies' activities.....	34
5. How EQAR contributes to the EHEA – Trust and Recognition.....	36
5.1 EHEA key commitment on quality assurance.....	36
5.2 Cross-border recognition of quality assurance results.....	38
5.3 EHEA key commitment on recognition.....	41
5.4 Major developments and changes in the EHEA.....	43
6. Overview of conclusions.....	46
6.1 Strengths.....	46
6.2 Weaknesses.....	46
6.3 Opportunities.....	46
6.4 Threats.....	47
6.5 Possible action points.....	48
Annex.....	49
1. Key reference documents.....	49
2. Survey results.....	50
3. Recommendations of the 2010/11 external evaluation.....	51
4. Recommendations of the 2016 self-evaluation report.....	54

List of figures and tables

Figures

Figure 1: Governmental Membership of EQAR.....	11
Figure 2: Organisational chart.....	11
Figure 3: Budget and staff.....	16
Figure 4: Case load and staff evolution.....	17
Figure 5: Applications for inclusion and registered agencies.....	18
Figure 6: Reasons for seeking EQAR registration.....	19
Figure 7: Are ESG and EQAR perceived as constraints?.....	22
Figure 8: Substantive Change Report (2011-2020).....	24
Figure 9: Register Committee decisions vs review panel conclusions.....	27
Figure 10: Feedback on activities under Strategic Goal 1 – Transparency and Information.....	30
Figure 11: EQAR website – unique pageviews of DEQAR and other pages.....	32
Figure 12: Areas for enhancement (members and potential members).....	34
Figure 13: Feedback on activities under Strategic Goal 2 – Trust and Recognition.....	36
Figure 14: Knowledge Base – unique page views (2020).....	37
Figure 15: Openness to cross-border external QA.....	39
Figure 16: Countries where the European Approach is available to HEIs.....	40
Figure 17: Registered and non-registered agencies active in cross-border QA.....	41

Tables

Table 1: Data sources of the self-evaluation.....	8
Table 2: Reports and Institutions in DEQAR (April 2021).....	31

Glossary

AC	Appeals Committee
API	application programming interface
BFUG	Bologna Follow-Up Group
BWSE	Bologna With Student Eyes
CEU	Central European University
CHEA	Council for Higher Education Accreditation
DEQAR	Database of External Quality Assurance Results
EADTU	European Association of Distance Teaching Universities
EB	Executive Board
ECA	European Consortium for Accreditation
EDCI	Europass Digital Credentials Infrastructure
EHEA	European Higher Education Area
ENIC	European Network of Information Centres
ENQA	European Association for Quality Assurance in Higher Education
EQA	external quality assurance
EQAF	European Quality Assurance Forum
EQAR	European Quality Assurance Register
ESG	Standards and Guidelines for Quality Assurance in the EHEA
ESU	European Students' Union
ETER	European Tertiary Education Register
ETUCE	European Trade Union Committee for Education
EU	European Union
EUA	European University Association
EURASHE	European Association of Institutions in Higher Education
GA	General Assembly
HE	higher education
HEI	higher education institutions
HEIDI	Higher Education Interoperable Data Initiative
IT	information technology
JP	joint programme
NARIC	National Academic Recognition Information Centre
QA	quality assurance
QAA	quality assurance agency
RC	Register Committee
REST	representational state transfer
RIQAA	Recognising International Quality Assurance Activity
SEG	Self-Evaluation Group
TPG	Thematic Peer Group
U&I	Policy on the Use and Interpretation of the ESG
URL	Uniform Resource Locator
YECHE	Yehuda Elkana Center for Higher Education

1. Introduction

1.1 Background

EQAR is the official register of quality assurance agencies in the European Higher Education Area (EHEA) that operate in compliance with the Standards and Guidelines for Quality Assurance in the EHEA (ESG). EQAR's primary task of managing the Register is clearly set out in the London Communiqué of European ministers of higher education (2007). This forms the mandate based on which EQAR was founded.

Ministers then requested that EQAR be evaluated externally after two years of operation:

"We ask the E4 group [...] to ensure that after two years of operation, the register is evaluated externally, taking account of the views of all stakeholders."

(London Communiqué, 2007)

Consequently, a first self-evaluation was launched in 2010 and an external evaluation of EQAR took place in 2011. The evaluation was coordinated by a Steering Group working under the auspices of the US Council for Higher Education Accreditation (CHEA), which appointed an independent expert panel. The report of the evaluation is published on the EQAR website¹.

In 2015 and 2016, EQAR carried out a comprehensive self-evaluation. The report was adopted by the 2016 General Assembly and published on the EQAR website². In its Strategy 2018 – 2022³, EQAR committed itself to initiate the next self-evaluation in 2020, followed by an external evaluation in 2021.

In June 2020, the EQAR General Assembly endorsed the key features for the evaluation, underlining that it should be an objective and credible analysis, and be regarded as such by EQAR's members, partners and stakeholders.

In October 2020, EQAR launched a Call for Tender⁴ to choose a suitable independent organisation to coordinate the external evaluation. Out of five tenders received, considering the relevant experience as well as the suitability and soundness of the approach, the Yehuda Elkana Center for Higher Education at Central European University (CEU YECHE, Vienna & Budapest) came out as first choice⁵ to assume the overall responsibility for the evaluation process.

1.2 Objectives of the self-evaluation and external evaluation

The overall purpose of the external evaluation is to address whether EQAR's organisational structure and the activities implemented by EQAR are fit for purpose and effective in light of its mission and objectives.

EQAR's Mission Statement thus forms the overall framework:

EQAR's vision is a coherent quality assurance framework for the European Higher Education Area in which higher education institutions have the freedom to turn to a suitable EQAR-registered agency for their external quality assurance reviews, and in which qualifications are thus universally recognised.

*EQAR's mission is to further the development of the European Higher Education Area by increasing the transparency of quality assurance, and thus enhancing trust and confidence in European higher education.*⁶

¹ <https://www.eqar.eu/about/evaluation-of-eqar/#external-evaluation-2011>

² <https://www.eqar.eu/about/evaluation-of-eqar/#self-evaluation-2016>

³ <https://www.eqar.eu/about/eqar-structure/general-assembly/#ga-in-sofia-2018>

⁴ <https://www.eqar.eu/call-for-tender-coordination-of-the-external-evaluation-of-eqar/>

⁵ <https://www.eqar.eu/ceu-elkana-center-will-coordinate-external-evaluation-of-eqar/>

⁶ <https://www.eqar.eu/about/close-up/#eqars-vision-mission-and-values>

EQAR's role and work are very closely linked to the ESG. The ESG are standards for quality assurance agencies and higher education institutions, drafted to be used – amongst others – by EQAR in assessing quality assurance agencies. Even though the ESG were not drafted to assess EQAR's work against them, EQAR members found it desirable to use the ESG themselves as a benchmark so as to demonstrate that EQAR applies the same standards to its own work.

Part 1 of the ESG contains standards for higher education institutions' quality assurance arrangements for teaching and learning. These standards cannot be translated to EQAR, but their relevance for EQAR's work is discussed with reference to standard 2.1 (Consideration of internal quality assurance), which links to Part 1.

Part 2 of the ESG is about the design of external quality assurance processes. Most of these standards can be applied to EQAR's processes for registration of agencies *mutatis mutandis*; they are addressed in chapter 3.

Part 3 of the ESG addresses the organisational characteristics of QA agencies. As EQAR is a different kind of organisation, the standards do not correspond directly to EQAR's role and mission. They are addressed in chapter 2 holistically, as far as they can be translated to EQAR.

With regard to the wider mission and objectives that the Register should achieve, the Strategy 2018 – 2022 formulated two strategic goals for the current period:

Strategic Goal 1 – Transparency and Information

EQAR provides reliable and widely-used information on registered quality assurance agencies as well as on which higher education institutions or programmes have been subject to external quality assurance in line with the ESG.

Strategic Goal 2 – International Trust and Recognition

EQAR-registered agencies and their QA results are recognised across the EHEA. On that basis, qualifications that were subject to external quality assurance by registered agencies (whether at institutional or programme level) are recognised and, in line with national requirements, higher education institutions are allowed to work with a suitable registered agency to fulfil their formal external quality assurance obligations.

Under each goal, the Strategy earmarked a suite of activities as well as indicators for progress; these are quoted as benchmarks throughout the report. Given EQAR's mission to further the development of the EHEA, these need to be considered in conjunction with the overarching policy goals of the EHEA set out in the ministerial communiqués.

Considering this framework, the agreed key features for the external evaluation formulated three specific questions, which have been considered in the self-evaluation:

1. Are the processes related to the Register fit for purpose? Do they comply with those ESG standards that are pertinent for and can be applied to EQAR correspondingly?
2. How has EQAR performed against the indicators defined in the Strategic Plan 2018-2022?
3. What is the extent of EQAR's contribution to the wider policy goals enshrined in its mission and objectives, and the vision of the EHEA?

The specific benchmarks arising from these questions are quoted in boxes at the beginning of each section: standards from ESG Parts 2 and 3, as well as activities and indicators from the EQAR Strategy 2018 – 2022.

1.3 Self-evaluation process

The self-evaluation process was coordinated by a self-evaluation group (SEG), including representatives of EQAR's key statutory bodies:

- Karl Dittrich (President)
- Michal Karpíšek (Executive Board)
- Tia Loukkola (Executive Board)
- Beate Treml (Register Committee)
- Steffen Westergard Andersen (Register Committee)
- Ivana Radonova (Governmental Member: Bulgaria)
- Daniel Miescher (Governmental Member: Liechtenstein)
- Colin Tück (Director)

The self-evaluation process was supported by the EQAR staff, in particular Melinda Szabó (Senior Policy Analyst) and Annelies Traas (Communications Officer).

The SEG drew on a range of sources, including surveys, desk research, information gathered by EQAR continuously and discussions at the EQAR Members' Dialogue; the sources are summarised in Table 1 and the survey results are annexed.

Surveys	Recipients (organisations)	Responses
EQAR members and potential members: governmental members, other EHEA governments, stakeholder organisations, GA observers: European Commission (EC), Council of Europe (CoE), UNESCO, BFUG Secretariat	59	45 (76%)
Quality assurance agencies (QAAs) based or operating in the EHEA, irrespective of registration status	100	71 (71%)
Applicants for registration: sent to QA agencies on a continuous basis after their applications	52	21 (41%)
Associations of higher education institutions: sent to national-level members of EUA & EURASHE	n/a	7
DEQAR micro survey: publicly available on website	n/a	94
Event	Target groups	
EQAR Members’ Dialogue (14/15 Jan 2021)	governments, European stakeholder organisations, EQAR committees	
Other sources		
<ul style="list-style-type: none">• EQAR knowledge base, analyses and policy briefs (see Annex 1)• Website statistics• Newsletter statistics• EHEA policy documents, reports, etc.		

Table 1: Data sources of the self-evaluation

1.4 How EQAR evolved since the 2010/11 evaluation

During the past ten years, a number of major changes in EQAR's work were implemented in response to recommendations of the 2010/11 external evaluation and 2015/16 self-evaluation (see Annex for a detailed overview), external developments as well as ongoing reflections by EQAR's bodies, including:

- Since 2013, EQAR has published the Register Committee's full decisions on all eligible applications for registration/renewal;
- EQAR built and has maintained a systematic knowledge base on EHEA quality assurance systems, available on its website;
- Following the adoption of the ESG 2015, EQAR updated its application and decision-making processes. This included the publication of the Policy on the Use and Interpretation of the ESG, which explains the Register Committee's approach and precedents;
- In 2017, the position of President was introduced, uniting the leadership of both the Executive Board (EB) and Register Committee (RC);
- In 2018, EQAR launched the Database of External Quality Assurance Results (DEQAR).

2. How EQAR is organised

EQAR was founded at the request of European ministers for higher education, laid down in the 2007 London Communiqué⁷. EQAR is the only European organisation established directly as a result of the Bologna Process, with an official mandate and as a key part of the European Higher Education Area (EHEA) infrastructure. This role is also codified in the EHEA key commitment on quality assurance:

Institutions granting degrees assure the quality of their programmes leading to degrees within the three-cycle system following the European Standards and Guidelines (ESG 2015).

External quality assurance (be it at programme or institutional level) is performed by Agencies that have demonstrably complied with the standards and guidelines stipulated in the current ESG. This is best ensured where only those agencies registered on the European Quality Assurance Register for Higher Education (EQAR) are allowed to operate in the country.⁸

2.1 Organisational structure and membership

Standard 3.1: [...] Agencies should ensure the involvement of stakeholders in their governance and work.

Standard 3.2: Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Activity: Reach out to the remaining EHEA countries to identify the reasons for not becoming governmental members and encourage them to join EQAR

Indicator: EQAR's governmental membership (goal: at least 90% of the EHEA countries by 2022)

EQAR is incorporated as International Non-Profit Association (INPA, French AISBL, Dutch IVZW) under Belgian law. The Register Committee was the "nucleus" of EQAR: it was part of the EHEA political agreement that the Register Committee would be the gatekeeper and it was thus the first body whose responsibilities and composition were clearly defined. This is probably unlike most membership-based organisations, which would usually be designed with its membership being the starting point.

In EQAR's case, an independent legal entity was created to accommodate the Register Committee and provide the necessary support structure; hence, the membership and the remaining structure (see Figure 2) were designed around it. EQAR's governance includes a large variety of stakeholders, represented by three groups of members.

The **Founding Members** are the E4 Group (ENQA, ESU, EUA, EURASHE).

The consultative members of the Bologna Follow-Up Group (BFUG) that represent the interests of employers or employees can become **Social Partner Members**, currently BUSINESSEUROPE and Education International/European Trade Union Committee for Education (EI-ETUCE) are members.

All 49 signatory countries of the Bologna Process can become **Governmental Members**. Currently, 41 of those are EQAR governmental members. The goal of 90% would mean 44 countries, i.e. 3 additional countries, while the ambition remains that all EHEA countries should become members.

Over the years, EQAR has had contact with most remaining countries, focusing on those that are generally active in EHEA structures and show interest in quality assurance matters. The BFUG

⁷ https://ehea.info/Upload/document/ministerial_declarations/2007_London_Communique_English_588697.pdf

⁸ https://ehea.info/Upload/document/ministerial_declarations/EHEAParis2018_Communique_AppendixI_952773.pdf

and working groups, especially the Thematic Peer Groups (TPGs), have been useful fora to develop contacts with non-member country representatives and raise their awareness about EQAR and its work.

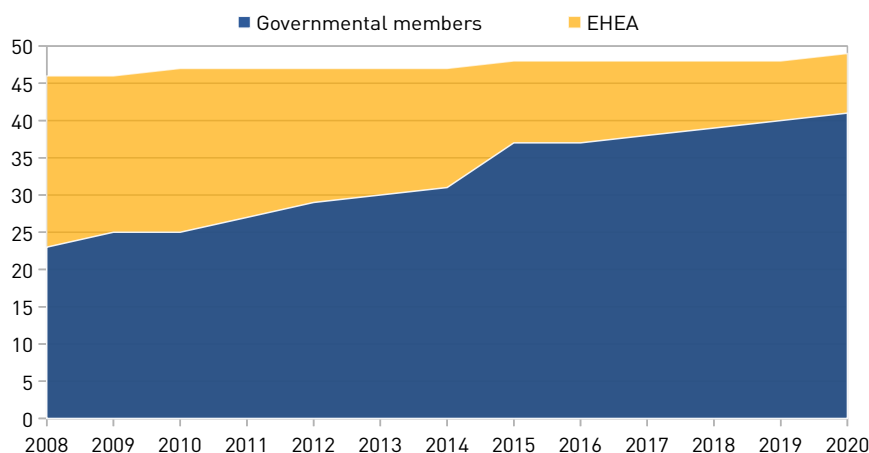


Figure 1: Governmental Membership of EQAR

The evolution of EQAR's membership is depicted in Figure 1. Four countries have become members since 2015: Greece, Hungary, Italy and Slovakia.

The EHEA countries that are not members are: Andorra, Belarus, Iceland, Holy See, Russia, San Marino, Serbia and Sweden. For most cases, it is difficult to establish clear and specific reasons for not becoming a Governmental Member. Many countries showed general interest and openness, but simply have had other priorities or not managed to take the necessary formal decisions.

In order to fulfil the EHEA key commitment countries are expected to use EQAR-registered agencies, while governmental membership in EQAR is not required. It is nevertheless noteworthy that only one of the non-member countries fulfils the EHEA key commitment on external QA.

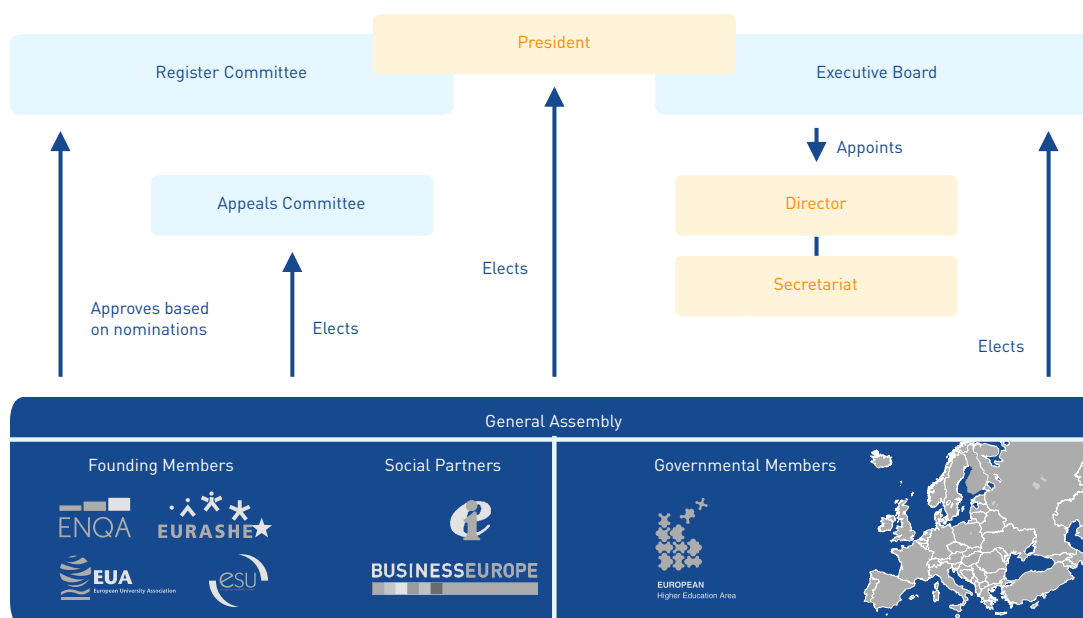


Figure 2: Organisational chart

The **General Assembly (GA)** is the supreme decision-making body of EQAR, comprising of all its members. In addition, there are four permanent observers at the GA: the European Commission, the BFUG Secretariat, the Council of Europe and UNESCO.

The GA convenes annually and decides on the budget, approves the accounts, elects the President, the Executive Board and the Appeals Committee, and approves the Register Committee.

Following the recommendations from the 2011 external review report and 2016 self-evaluation report, the General Assembly established the position of **President** in 2017. The President is responsible for the leadership of the whole organisation. In particular, the President:

- chairs the Executive Board, the Register Committee and the General Assembly;
- represents EQAR externally at high-level meetings and events;
- ensures coherence in the work of all EQAR bodies.

The President is the chair and a voting member of the EB, and non-voting chair of the RC and the GA. In 2018/19, the initial impact of this change was evaluated, with a report submitted to the 2019 GA.

The **Executive Board (EB)** is in charge of the ongoing management and strategic coordination of EQAR, including administrative and financial matters. The Executive Board comprises of five members: the President and one from each Founding Member.

The members of the Executive Board are elected by the General Assembly for a two-year mandate. The Board itself designates the Vice-President and the Treasurer from among its members.

The composition and the role of the Executive Board were designed ad hoc and with a view to expedite organisational processes when EQAR was established. The experience shows that the composition of the Executive Board by E4 representatives assures a close link and coordination of EQAR with the key stakeholder organisations, but also leads to a double role of its members. This bears a potential for conflict where EQAR's strategic interests might collide with those of an individual organisation.

The **Register Committee (RC)** is responsible for all matters related to the management of the Register as such. In particular, the RC:

- receives, evaluates and decides upon applications for inclusion on the Register and for renewal of registration;
- considers substantive changes in the registered agencies' structure or activities;
- considers complaints about registered agencies made by third parties;
- may conduct an extraordinary review of an agency's registration;
- adopts and revises the Procedures for Applications in consultation with the GA;
- adopts a policy on the Use and Interpretation of the ESG, in line with the Procedures, and further policies on specific matters as needed.

It comprises of eleven members experienced in quality assurance of higher education, acting as independent experts and in their individual capacity. Each Founding Member nominates two members of the Register Committee and one member is nominated by each Social Partner. The Register Committee is approved by the General Assembly for a mandate of two years; a member may be re-nominated up to three times. In addition, the President is a member of the Register Committee without voting rights.

Five governmental authorities are nominated by the General Assembly as observers on the Register Committee. The observers attend the RC meetings and closely follow the work of the Committee; they report annually at the General Assembly.

The **Appeals Committee (AC)** has the responsibility to consider appeals against decisions of the Register Committee. It consists of the chair, two members, the deputy chair and two deputy members. They are elected by the General Assembly for a mandate of four years, renewable

once.

The **Secretariat** is in charge of the daily management and administration of EQAR. It supports all other statutory bodies and facilitates internal communication; serves as a contact point for agencies, members, partners and externals; and represents EQAR externally in consultation with the President.

The Secretariat is currently (2021) staffed by the following positions:

- Director (full-time)
- Senior Policy Analyst (full-time)
- Policy and Project Officer (full-time)
- Communications Officer (0,7 FTE)
- Project Reporting & Finance Officer (0,5 FTE)

Conclusion

EQAR's role is clearly recognised as part of the EHEA framework and key commitments. The organisational structure of EQAR serves the organisation's purposes; the legal framework for IN-PAs is flexible and makes it possible to accommodate the organisation's needs.

EQAR has been successful in broadening its membership, using various opportunities to connect with non-members so far; the goal of 3 more countries joining by end of 2022 is challenging, but remains realistic.

The introduction of an elected President was unequivocally welcomed and regarded as benefiting EQAR's development. This was confirmed in an initial appraisal of the structural change in 2018/19. The change allowed the organisation to have a representative who is independent of its members, can raise the visibility of EQAR externally, and enhances stability and leadership internally. The position also reaffirmed the central role of the Register Committee and avoids potential for internal confusion or conflict, compared to the previously separate leaderships of the Executive Board and the Register Committee.

While most members consider EQAR's structure suitable and feel sufficiently involved/represented, some survey respondents noted that governments were differently involved than the European stakeholder organisations.

As the growing number of governmental members is not represented on the Board and now that EQAR is firmly established as an organisation, it might be worthwhile discussing how the Board is composed and what are its responsibilities vis-à-vis those of the President and the Director, balancing the need for a link with the E4 organisations and the need for EQAR to act independently.

2.2 Independence

Standard 3.3: Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

The ESG describe organisational independence as one dimension of independence. An international non-profit association is by definition membership-based. As such, EQAR cannot be entirely independent of its members, but the number and diversity of members prevents any single member from controlling and influencing EQAR's work on their own. Furthermore, the diversity of EQAR's membership underlines the organisation's public-interest role.

Structurally, both a majority of governments as well as a majority of stakeholder organisations could block any decision by the EQAR GA. Given their representation on the EB and nominations to the RC (see above), the Founding Members are involved in EQAR's work more closely than gov-

ernments.

EQAR's primary funding source are annual fees paid by the governmental and stakeholder members (see section 2.4 on resources for details).

Operational independence and the independence of formal outcomes, as described in the ESG, relate to the management of the Register, which is entirely under the authority of the Register Committee.

The Committee is composed of nominees from different stakeholder backgrounds; its members are nominated as individuals and not as representatives of their organisation. They are expected to carry out their work in a personal capacity and in line with EQAR's regulations.

EQAR's Code of Conduct has been revised in recent years and includes a wide range of provisions to ensure a high level of integrity and independence in the functioning of the Register Committee as an independent decision-making body; its members and observers are expected to declare possible conflicts of interest and to recuse themselves from the deliberations on cases where they have a conflict of interest.

The decision-making on registration is largely decoupled from EQAR's funding: even though registered agencies pay a small fee, these are very modest and the direct financial impact of registering or not registering an agency is thus minimal; as the agency fees do not make up a substantial part of EQAR's income, this is unlikely to put a pressure on the RC's decision.

Aware of possible limitations due to any conscious or unconscious bias (e.g. based on the geographical origin of an agency), the Committee has considered the possibility of preventing this by "blinding" the analysis of an application. This option would, however, not be feasible: the specific features of an agency and its higher education system would always enable a well-informed QA expert to identify the agency in question. In other words, anonymising applications would require redacting so much information that the report would no longer be intelligible.

Conclusion

Both members and QA agencies regard EQAR's independence as a crucial condition for trust in its gatekeeper role.

The organisational structure of EQAR safeguards the Register Committee's independence in deciding on ESG compliance and registration of agencies. The registration processes assure a fair and unbiased consideration of cases to the largest possible extent.

2.3 Strategy, activities and quality assurance

Standard 3.1: [...] [Agencies] should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. [...]

Standard 3.6: Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Standard 3.7: Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

The general goals and objectives of EQAR's work are set out in its Mission Statement, which is published on its website. The Strategy defines the high-level goals and areas of activity for a five-year period. Both are adopted by the General Assembly.

Based on these high-level goals, the General Assembly adopts a "rolling work plan": it covers two calendar years and is updated annually. The work plan describes in more detail how the activities envisaged in the Strategy will be implemented (see also EQAR Strategy for 2018 – 2022). The General Assembly reviews annual progress reports on the work plan.

Following a recommendation of its 2016 self-evaluation report, EQAR adopted a 5-year cycle for organisation-wide self-evaluations, with an external evaluation following every second time, i.e. every 10 years. In its Strategy 2018 – 2022 EQAR consequently committed itself to carry out the current self-evaluation and external evaluation.

EQAR has an Internal Handbook that informs and supports the work of the EQAR staff and those serving on EQAR's committees (Register Committee, Executive Board or Appeals Committee). The handbook has been updated and revised continuously to reflect changes in EQAR's structures and procedures.

EQAR's Code of Conduct includes provisions that refer to the ethical and responsible conduct of those acting on the organisation's behalf.

The registration process is governed by a stack of official documents:

1. The **Statutes** make basic provisions related to the registration process. These are fairly generic and have remained unchanged since EQAR's founding.
2. The Statutes provide that the **ESG** serve as criteria for registration.
3. The Statutes delegate detailed provisions to the **Procedures for Applications**, adopted by the Register Committee in consultation with the General Assembly. The Procedures have been revised twice so far.
4. The **Appeals Procedure** sets out criteria and processes for appeals. It was adopted by the General Assembly and has been unchanged since 2008.
5. The Procedures provide for a Policy on the **Use and Interpretation of the ESG** in which the Register Committee makes transparent its application of the ESG. The document is currently in its fourth edition.
6. The Procedures stipulate that the Register Committee may adopt **further policies** to address specific cases or circumstances (e.g. mergers of registered agencies).

The daily work of the Register Committee and EQAR staff is informed by the Internal Handbook, the most substantial part of which is on the registration process. It gives guidance on the detailed practical steps in handling applications and change reports in line with the formal rules.

EQAR staff maintain application and reporting forms for agencies' use. A suite of templates for internal analyses, requests and public decisions is used to ensure consistency in handling applications and change reports. These are maintained by EQAR staff and linked to an internal database, keeping track of key data on all applications, reports and complaints.

To help address possible issues and improve the process for future applications for registration, the Register Committee has considered the results on the Feedback Application survey and reflected on e.g. the clarity and usefulness of the guide for applicants, EQAR website, procedures or policies and communication with the EQAR Secretariat (see section 3.3 for details).

The annual meetings with ENQA as a key stakeholder serve as an additional opportunity to receive feedback from the agencies' perspectives.

Conclusion

Following a focus on operational issues and getting the Register as such up and running in its early years, EQAR has established a clear strategic planning to guide its further activities. Most notably through the General Assembly and Members' Dialogue, EQAR's two annual main events for members, its key stakeholders are involved in discussing the organisation's priorities. The regular self-evaluations and external evaluations give members a robust basis to recalibrate EQAR's strategic priorities.

Mechanisms are in place for the quality assurance of EQAR's registration processes. However,

the analysis of the permanent applicant feedback survey has not followed a periodic pattern or fixed cycle so far. The Register Committee considered that a formal review of feedback received should take place with a two-year cycle. Moreover, the brief report analysing the feedback received and summarising the steps taken/discussed should be published in the future.

2.4 Resources

Standard 3.5: Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

EQAR has an annual revenue of ca. EUR 400 000⁹ and currently employs 4,2 full-time equivalent (FTE) staff; Figure 3 shows the evolution since 2008¹⁰.

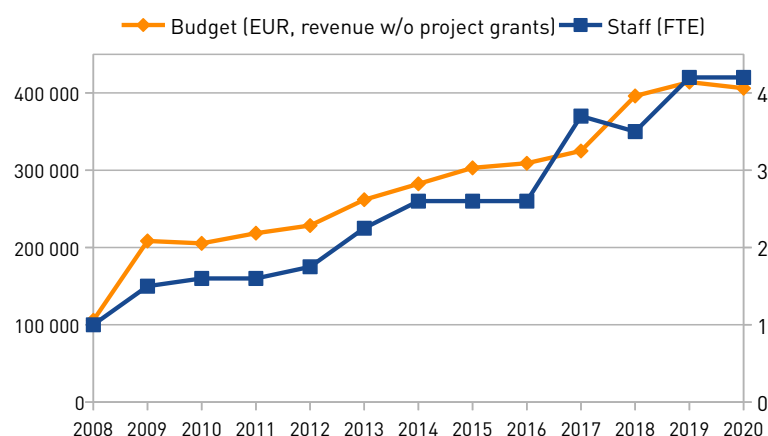


Figure 3: Budget and staff

The main sources of revenue are annual membership fees from EQAR's founding and stakeholder members (ca. 5%), governmental members (ca. 78%) and application/registration fees (ca. 15%). EQAR has successfully applied for a small number of Erasmus+ funded projects (RIQAA in 2014, DEQAR in 2017, DEQAR CONNECT in 2020) and has been a partner in some additional ones, however usually with a small role and limited budgetary impact.

EQAR's initial budget and fee levels were proposed on the basis of the operational model adopted by ministers in 2007. There has been only one substantial revision of the membership fees, which became effective in 2018, linked to the introduction of the position of President and the launch of the Database of External Quality Assurance Results (DEQAR).

The management of the register is assured by the Register Committee members as well as EQAR's staff. As a metric for the workload, the case load index¹¹ includes the work on both applications and substantive change reports. Figure 4 shows that the workload fluctuates substantially from year to year, with an upward trend.

While EQAR's total staff has evolved similarly, the staff time deployed to the Register work in particular lags slightly behind the evolution of the case load. Similarly, the workload of the Register Committee members, who contribute significantly as rapporteurs and review policies as well as decisions prepared by EQAR staff, has grown. Committee members are volunteers and not remunerated for their duties, but only receive a modest compensation to cover their direct expenses.

⁹ This excludes project grants, e.g. for DEQAR or DEQAR CONNECT, which are not recurring.

¹⁰ The year 2008 is not representative, as EQAR did not fully operate under its own budget yet. Membership fees were only charged 50% in 2008.

¹¹ Applications weighed with factor 4 until 2014 and 4.5 from 2015 onwards (due to the additional eligibility confirmation step), Substantive Change Reports weighed with factor 1, 2011 = 100.

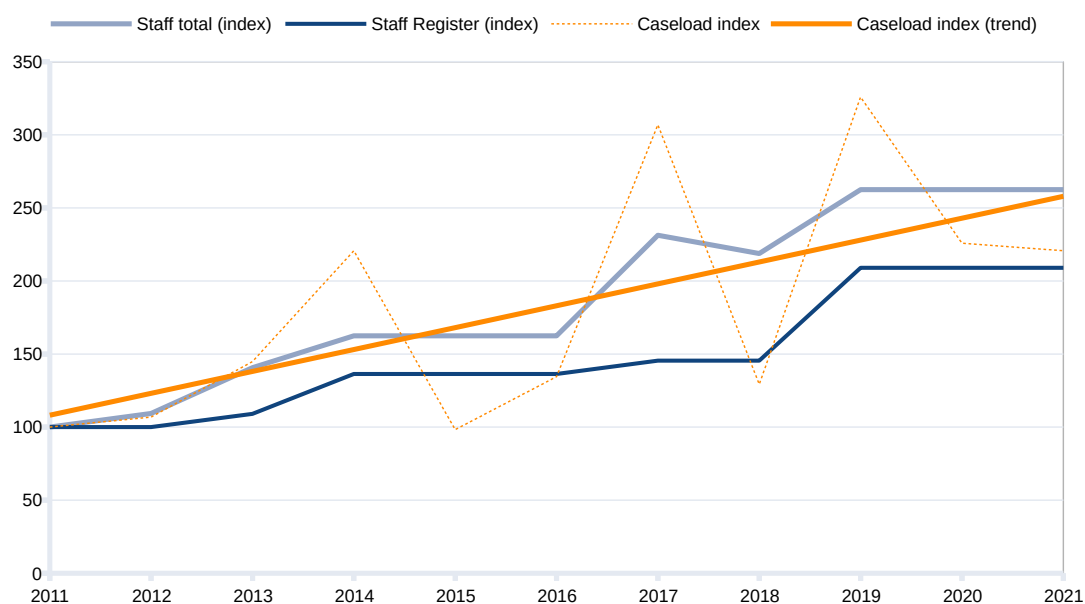


Figure 4: Case load and staff evolution

Conclusion

The organisation has successfully operated on modest resources, which have enabled it to perform its core function. The staffing needs have grown over the years as a result of the raising numbers of registered agencies, rising expectations towards EQAR's maintenance of an EHEA knowledge base and contribution to the EHEA, and not the least the development of DEQAR.

While the current resources are just sufficient to carry out EQAR's core tasks and its current further activities, major additional activities could not be implemented without adequate resources, project-based or permanent depending on the nature of what is expected.

3. How EQAR manages the Register

Standard 3.1: Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. [...]

Activity: Maintain the register of quality assurance agencies and provide public information

Activity: Ensure that EQAR's instruments for monitoring agencies are seen as effective by agencies and policy makers

Activity: Maintain the active dialogue and communication with ENQA as the main review coordinator and representative body of agencies

As its core activity EQAR maintains the register of quality assurance agencies, providing reliable information on quality of European higher education and its assurance. This is not an external quality assurance activity as defined in Part 2 of the ESG as such, as the ESG relate to external quality assurance activities undertaken *by* agencies, not to the external quality assurance *of* agencies. Nevertheless, the standards can mostly be applied to EQAR's processes and these are thus analysed against ESG standards 2.1 – 2.7 in the following sections.

It has to be borne in mind that many elements addressed by the ESG relate to the reviews of quality assurance agencies. While EQAR's work is based on these reviews and they form the basis for the Register Committee's decision, EQAR does not carry out reviews itself. For those elements, the report hence reflects on how EQAR ensures that the agency reviews it uses are aligned with the standards.

3.1 Applications for registration

Indicator: Number of applicant QA agencies (compared with the total number of QA agencies operating in Europe)

Currently, 50 quality assurance agencies are registered on EQAR. Since the Register started its work in 2008, the Register Committee has considered 142 applications (see Figure 5), of which it has approved 117 applications (61 for initial inclusion and 56 applications for renewal of registration) and rejected 14 applications (10 for initial inclusion, 4 renewals); 11 applications were withdrawn. The "success rate" for initial registration is 75%, whereas approximately 1 in 5 applications is only approved after additional representation.

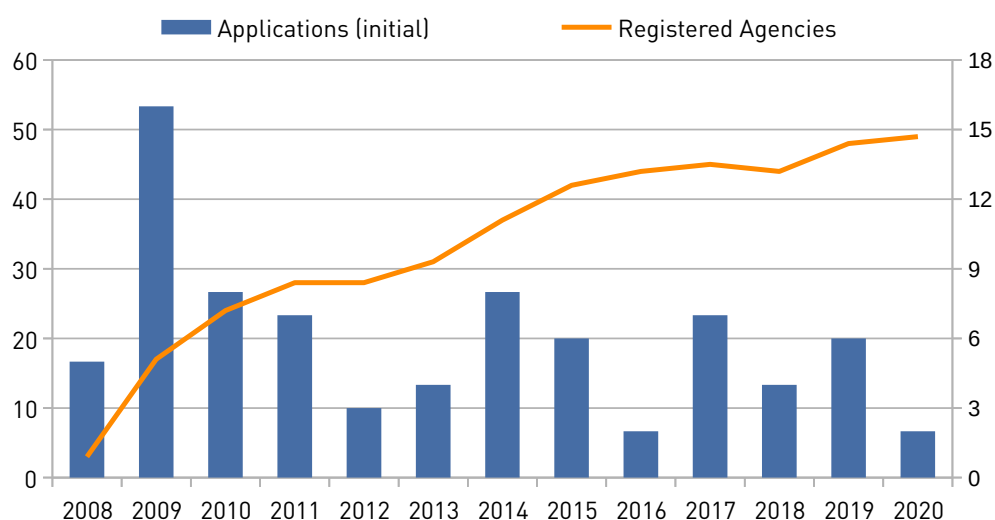


Figure 5: Applications for inclusion and registered agencies

EQAR surveyed 100 QA agencies operating in Europe¹² for the present self-evaluation. 71 agencies responded, 43 of whom are registered, 5 are currently applying for registration, 4 had applied but withdrew the application or were rejected, and 19 agencies never applied. Out of the latter two categories (not yet registered on EQAR, 23 respondents), 16 plan to (re-)apply, 2 do not plan to and 5 are not sure (yet).

In 2015, EQAR estimated that there were about 90 QA agencies in Europe, of which 48 had applied for registration (53%); by now, 67 of the 100 known QA agencies in Europe have applied.

According to the self-evaluation QA agency survey the **main reason for most agencies seeking EQAR-registration** is the opportunity to improve their international reputation (83%), followed closely by the possibility to facilitate the recognition of reviewed HEIs/programmes (81%); Figure 6 illustrates further motivations and how they evolved since 2015. Surveyed governments have reaffirmed as well the importance that the quality assurance (QA) agencies carrying out external QA are listed in EQAR (very important or important to 38 of 39 countries).

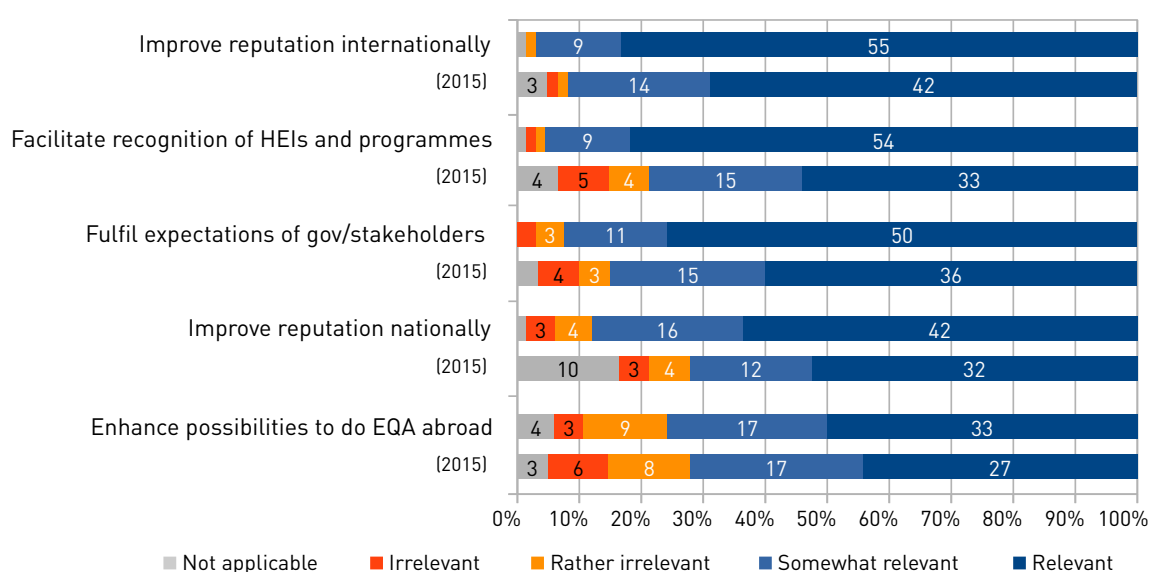


Figure 6: Reasons for seeking EQAR registration

QA agencies who have decided not to apply (2 responses) or were unsure on whether they would (re-)apply (5 responses) have cited as main reasons: needing to still adapt their procedures to the ESGs, having to undertake major organisational changes within the agency, the high costs of an external review (i.e. in particular for small non-profit agencies), and the fact that they do not expect to be able to meet EQAR registration requirements.

Some respondents also raised the fact that their **HE system is not yet fully aligned with the ESG**, i.e. the legal frameworks or other conditions prevent the agency from complying with certain standards. This inhibits the possibility for those QA agencies to seek EQAR-registration. Consequently, some respondents indicated that they might revisit this decision as national conditions are changing.

As of 2021, EQAR is aware of only 2 agencies (in 2015: 6) that have undergone an external review against the ESG recently, but decided not to apply for registration. A small number of agencies withdrew their application before a final decision was made.

¹² This included all quality assurance agencies that are registered on EQAR or have ever applied, agencies that are members or affiliates of ENQA, other European agencies EQAR is aware of as well as a few non-European QA agencies with sizeable activities in Europe. An exact number of "QA agencies in Europe" is naturally difficult to establish.

Conclusion

It is clear that virtually all agencies operating in Europe, with very few exceptions, aim to achieve EQAR registration and are willing to align their work to the ESG; in particular, EQAR-registration remains of interest for those with an initially unsuccessful application. The number of applications matches the number of QA agencies that are in a position to apply considering their maturity and the conditions for operation in their higher education system.

3.2 Consideration of internal quality assurance

Standard 2.1: External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

QA agencies are expected to ensure that Part 1 of the ESG is reflected/covered in their criteria. As Part 1 relates specifically to higher education institutions, this could obviously not be translated into an expectation that EQAR incorporates Part 1 directly in its criteria for registration.

EQAR has, however, emphasised that ESG 2.1 and how the standards of ESG Part 1 are addressed in the agency's external QA processes are important for the link between quality assurance in line with the ESG and quality of higher education. EQAR has thus strived to assure that this standard is well-covered in the external reviews of agencies.

Part 1 of the ESG 2005 differed substantially in content, whereas standard 2.1 was nearly identical. However, pre-2015, agency reviews contained only a generic analysis of how the agencies' processes addressed effectiveness of internal QA, but did not generally undertake a detailed mapping or a standard-by-standard analysis of how ESG Part 1 is reflected.

In the EQAR Policy on the Use and Interpretation, the expectation to do so was underlined. Agency review reports since 2015 have included a clear mapping between ESG Part 1 and the agency's standards, with different levels of detail in their analysis.

Of the 60 applications that were considered against ESG 2015, the Register Committee found that the standard ESG 2.1 was only partially complied with in 7 cases (12 %). In some cases, the Committee noted that the ESG Part 1 standards were "added on" to the existing standards leading to some omissions and confusion in their application, whilst in other cases elements of ESG Part 1 were not updated in the agencies procedure or they were insufficiently addressed.

Conclusion

In the transition to the ESG 2015, EQAR was able to raise the attention given to ESG 2.1 in agency reviews and its own decision-making. This attention underlines that internal QA, undertaken by higher education institutions taking responsibility for their own quality, is the basis of a successful quality assurance framework.

In particular, the attention given to ESG 2.1 has enhanced clarity what EQAR registration and ESG compliance actually stand for, by making clearer what registered agencies evaluate or certify.

3.3 Designing methodologies fit for purpose

Standard 2.2: External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

The aim of the Register is to provide assurance to the public that the registered agencies work in substantial compliance with the ESG; the registration processes thus seek to assert this.

The core process in that regard is an independent external review of the registered or applicant agency, coordinated by a third-party organisation that is independent of the agency under review. On the basis of the review report the EQAR Register Committee makes a decision to (re-)register the agency or otherwise.

In line with the ESG (standard 3.7), the review is cyclical and takes place every 5 years, followed by a decision on re-registration of the agency.

Generally, basing decisions on an external review is necessary due to the nature of the ESG: assessing compliance with the standards requires a careful expert judgement that could not be replaced by a simple, technical desk-based process.

However, the reviews look at the past performance of an agency. Considering that agencies are awarded registration for the 5 years to come, it could be argued that the process makes a future prediction of the agency's professionalism and trustworthiness based on past performance. Therefore, EQAR has put in place measures for ongoing monitoring to ensure the transparency and reliability of the Register:

- Substantive Change Reports to ensure that information on the EQAR Register is updated and that changes are compatible with the ESG;
- a Complaints Policy to address substantiated doubts about a registered agency's compliance with the ESG that are brought to EQAR's attention by third parties.

Overall, the feedback received through surveys and the trust put in EQAR registration suggest that these arrangements are fit for purpose; specific issues are discussed in this and the following section.

Continuous improvement

EQAR collects feedback from applicants through a survey sent to each agency after their application has been completed. Further development of EQAR's processes is mainly driven by such feedback and the Register Committee's own reflections coming from its work.

In the past years, EQAR's processes have undergone a number of developments and changes to ensure that they remain fit for purpose, e.g.:

- EQAR's website has been updated, including more features related to the activity of registered agencies and the publication of the full documentation on applications (previously only decision);
- initially, the Register Committee made a holistic judgement and sometimes raised flags on specific issues, but did not make an explicit per-standard compliance judgement. Flags have been abolished and an explicit compliance judgement on each standard was introduced, with a compliance table included in each decision;
- a clarification on the nature of external QA activities within the scope of the ESG was provided, including information on the separation between external QA and other activities (see Policy on the Use and Interpretation of the ESG);
- an obligatory eligibility check was introduced to clarify the agency's activities and the scope of the ESG review before it takes place;
- the consideration of the agencies' applications has moved from a separate eligibility confirmation letter to agreeing on the tripartite Terms of Reference (between the agency, the review coordinator and EQAR), simplifying the application process.
- the requirements for the eligibility of review coordinators and panels have been clarified¹³

Any changes to the EQAR Procedures for Applications involve consultation of the General Assembly, on which EQAR's stakeholders are represented. According to the Procedures, subsidiary policies can be adopted by the Register Committee without mandatory consultation. The Committee, however, regularly consults EQAR members before major changes. In addition, many

¹³ For quality assurance agencies seeking to choose a review coordinator other than ENQA. See <https://www.eqar.eu/about/official-documents/#eligibility-of-review-coordinators-and-panels>

changes were discussed specifically with ENQA, in its capacity of being the representative organisation of agencies as well as being the largest coordinator of agency reviews.

In 2019, EQAR launched a consultation on the Policy on the Use and Interpretation of the ESG (U&I)¹⁴. The Register Committee sought comments and suggestions by reviewed agencies, review panel members and review coordinators; these are the main audience of the document. The consultation allowed respondents to make specific comments on all expectations and interpretations of various standards. Later in the process, the EQAR General Assembly was consulted on the draft revision.

In 2020, EQAR has revised its Guide for Agencies taking into account feedback from the agency survey. The new Guide is published as a web-based document, allowing easy updating and navigation through its chapters.

Flexibility of ESG and their use

EQAR has inquired registered but also non-registered agencies whether they found that the requirements of the ESG or how they are used by EQAR constrained them in innovating/developing their external QA activities.

It is in the nature of standards that they might lead to constraints for some. Nevertheless, most agencies (see Figure 7) responded that they do not feel constrained by EQAR or the ESG requirements. This might reflect that the ESG represent a very established consensus of the sector.

Some agencies pointed (see survey results) to some constraints in carrying out ad-hoc QA activities and the expectation of compliance with the ESG beyond the EHEA. These understandings have, however, been discussed with EQAR members repeatedly, and the Register Committee's approach has been endorsed in that regard. Other agencies mentioned requirements relating to the independence of experts, the requirement for reviews to be cyclical or the requirement to publish the full evaluation reports. All of these are, however, clear requirements set out in the ESG and not in EQAR's power to change.

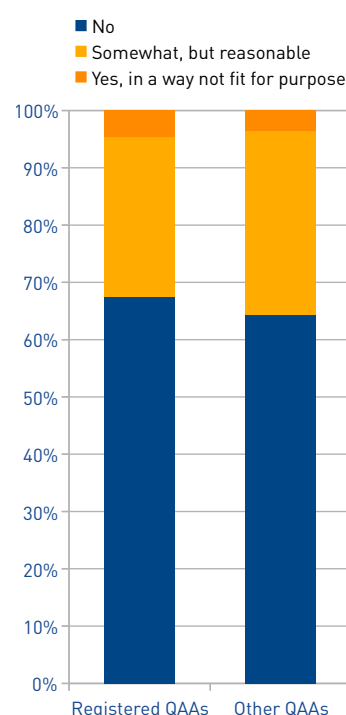


Figure 7: Are ESG and EQAR perceived as constraints?

Approach to third and further reviews of agencies

38 of the 49 registered agencies have been registered for an extended period of time and underwent at least two external reviews already, with the latest one against the ESG 2015. Similar to higher education institutions, quality assurance agencies maintain the primary responsibility for reviewing and improving their own quality and processes. While many agencies will have seen changes in some areas since their last review, experience shows that renewal reviews often address a lot of areas where nothing has changed and the analysis thus does not differ much from the previous review.

Endlessly repeating the 5-year cycle of reviews could thus lead to fatigue and the external review becoming more of a bureaucratic exercise than a useful quality assurance process. As a result of reflections in regular discussions with ENQA as well as highlighted by some survey respondents, the Register Committee has begun to consider possible changes to its processes by emphasizing EQAR's role as a gate-keeper and reconsidering whether the "one-size-fits all approach" of reviews is still fit for the purpose. Instead, a more targeted review could address primarily those issues that were not considered compliant in the last review and where changes have occurred

¹⁴ See survey results in Annex 1.

(e.g. new activities). At the same time, any such arrangement would need to maintain full trust in the registered agency's substantial compliance with all ESG standards.

Conclusion

The registration processes and the choice of monitoring processes generally correspond to the objectives of the Register. Registration on EQAR does not impose any unreasonable constraints on agencies' activities, bearing in mind that it is in the nature of an agreed standard (understood as meeting certain minimum requirements) such as the ESG to constrain activities to a certain extent.

EQAR has started to consider a more targeted review for agencies that are going through their third or further review against the ESG in order to avoid that reviews become a repetitive exercise. If successful, this would help keep the European QA framework meaningful for both "new" and "mature" agencies.

3.4 Implementing processes

Standard 2.3: External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

As described in the previous section, the Register is underpinned by a suite of three processes: agency reviews for inclusion/renewal, Substantive Change Reports and Complaints. These are addressed in more detail herein.

Agency reviews for inclusion/renewal

While initial applications for inclusion dominated the work in the early years, since the last self-evaluation in March 2016 the Register Committee considered twice as many renewal applications (42) as applications for initial inclusion (21). This was to be expected as the Register has grown and a large backlog of applications from the existing, well-established agencies in Europe had been dealt with.

In terms of the required features for an agency review, EQAR does not carry out reviews itself, but agrees to the Terms of Reference for the review with the coordinator and applicant agency. Three of the key features are explicit requirements in the EQAR Procedures for Applications: reviews need to be based on a self-evaluation (§1.14); an external assessment is carried out by a panel, includes a site-visit (§1.17) and leads to a public report (§1.18).

EQAR has no processes to follow up recommendations from the reviews. This is rooted in the fact that EQAR registration is purely accountability-focused. There is currently no possibility for conditional or time-limited registration, hence a follow-up of formal conditions would not be applicable either. The follow-up is limited to situations where changes (see substantive change process below) or concerns (see complaints below) occur.

The vast majority of reviews are currently coordinated by ENQA. For reviews that are not coordinated by ENQA, the Committee has adopted a policy on the Eligibility of Review Coordinators and Panels to ensure that minimum requirements are met.

EQAR has continuously maintained an active dialogue with ENQA, i.e. annual meetings, participation in the training of external reviewers, agreement on a tripartite Terms of Reference etc. The collaboration with ENQA ensures that reviews of QA agencies meet the requirements for the

agency's application to EQAR and that adaptations are easily put in place if necessary e.g. considering the restrictions imposed by the global COVID-19 pandemic.

In general, the feedback received from members and QA agencies showed that the registration process is functioning well and efficiently. Where concerns were raised these mainly referred to the fact that two decisions are independently made based on review reports, by EQAR on registration and by ENQA on membership for many agencies. In particular, agencies were dissatisfied where EQAR's conclusions differed from those of the review panel; this is addressed further in section 3.6 below.

While some respondents saw a need to further improve the dialogue and coordination with ENQA, most respondents noted appreciation for the improvements made over the past years, leading to a more streamlined experience when undergoing an ENQA-coordinated agency review and EQAR application process.

The survey respondents found the Guide for Agencies to provide sufficient information to prepare their application (90%) and, if such information was not sufficiently clear, that they have obtained further clarification from the EQAR Secretariat easily.

Substantive Change Reports

Registered agencies are required to submit Substantive Change Reports in case of changes to their external QA activities, organisational structure, statutes or methodology, to ensure that information on the EQAR Register is updated and that changes are compatible with the ESG.

The Register Committee has considered 56 Change Reports since 2015. Of the 48 currently registered agencies, 20 reported changes once, 11 agencies twice and only 4 agencies more often; 14 agencies had no changes to report (yet).

The number of reports per year fluctuates, with a slightly upward trend (see Figure 8). In most cases [52], the Register Committee could simply take note of the report.

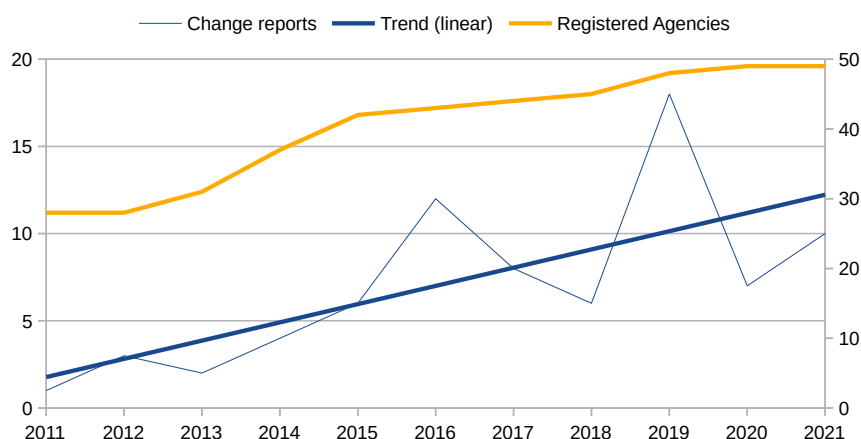


Figure 8: Substantive Change Report (2011-2020)

In two cases, a report raised concerns about the agency's compliance with specific standards and the Register Committee requested the agency to make a further report. In one case, the issues could be resolved; the second case was recent and the further report has not yet been made.

Two reports became irrelevant as the reporting agencies were removed from the Register in the meantime¹⁵.

The Register Committee's reflections and the self-evaluation surveys raised a few issues with re-

¹⁵ In one case, as a result of a rejected renewal application. In another case, a different matter led to an extraordinary revision and exclusion of the agency.

gard to Substantive Change Reports:

- This monitoring instrument seems not to be sufficiently known and understood. When members and agencies were asked how well different areas have been addressed, “Ensure that EQAR’s instruments for monitoring agencies are seen as effective by agencies and policy makers” was one of the two areas with the least positive feedback, most notably a large proportion of “don’t know” replies.
- Many changes are reported with significant delay and agencies seem to be unclear about the expected time when to report a change.
- There is no mechanism for the Register Committee to know whether changes have occurred but have not been reported.
- In cases where concerns about ESG compliance arise, the Register Committee can refer back to the agency for a further report once. If concerns remain, there are no “nuances” available between proceeding to exclude an agency from the register altogether or referring the matter to the next review, which might leave the concern unresolved for several years.

Complaints

If third parties have substantiated doubts about a registered agency’s credibility and compliance with the ESG, such doubts can be brought to EQAR’s attention.

This possibility has been formally codified in the Complaints Policy since 2011, the development of which was triggered by a “free-form” complaint received previously. The Complaints Policy was revised in 2014 and 2015, the latter revision explicitly introducing the possibility to also make complaints anonymously.

EQAR has received only 5 complaints to date, of which:

- 3 were considered inadmissible (one case referred to how national legislation should be construed, the other two related to activities outside the scope of the ESG);
- 2 complaints were admissible and considered on their substance (one complaint led to a formal warning¹⁶ to a registered agency, the other was found to be unsubstantiated¹⁷).

The number of complaints received is small; the limited experience does, however, not point to any issues in the complaints process. Those complaints that were admissible could be responded to adequately; receiving complaints that are inadmissible is a relatively normal effect.

Conclusion

The agency review and registration/renewal processes are clearly documented, mostly well understood by the agencies and function well.

The processes to monitor changes in registered agencies might need to become more effective to ensure that EQAR becomes aware of all substantive changes in a timely manner and can respond adequately to serve its role. In particular, it would be helpful to allow for a more graduated response – between no action and the drastic response of excluding an agency from the Register – in case of clear issues or shortcomings in a registered agency’s compliance with the ESG.

3.5 Peer-review experts

Standard 2.4: External quality assurance should be carried out by groups of external experts that include (a) student member(s).

The requirements for external review panels are set out in the EQAR’s Procedures for Applica -

¹⁶ https://backend.deqar.eu/reports/EQAR/RC13_04_5_AHPGS-SKVC_Decision_v1_0.pdf

¹⁷ https://www.eqar.eu/assets/uploads/2020/07/2020-06_CO5_Complaint_Decision_redacted.pdf

tions. The panel must consist of at least four persons that include at least one student and one academic staff member involved in education and research.

EQAR is notified of the panel composition once the members have been appointed. Concerns may be raised with the coordinator in case the composition does not meet the review requirements.

ENQA uses only trained experts. For reviews not coordinated by ENQA, EQAR similarly requires that experts have either undergone formal training or have participated in at least two prior reviews.

Both statistics and feedback from experts and agencies suggest that the steps taken to formulate the RC's expectations clearly and transparently have helped. At the same time, it still happens frequently that review reports are not fully aligned with the Register Committee's expectations and understanding of the standards (see further under 2.5 below).

This might in part be due to shortcomings in the training. Even though EQAR does contribute to the training of experts organised by ENQA, the use of reports by EQAR and the resulting expectations represent only a small part of those trainings.

Conclusion

EQAR's arrangements ensure that agency reviews are carried out by groups of experts that comply with this standard and that are trained. EQAR is, however, not closely involved in the training of experts.

Especially in light of the remaining occurrences where the panel's and the RC's understanding of the standards diverge (see following section), it is important for EQAR to communicate the Register Committee's expectations to the review panels effectively. EQAR needs to explore how the training and briefing could be enhanced, e.g. in cooperation with ENQA as the largest review coordinator or through its own arrangements.

3.6 Criteria for outcomes

Standard 2.5: Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

The ESG (Parts 2 and 3) serve as criteria for registration, and that is made transparent in numerous documents.

The Register Committee is responsible for making official, authoritative decision on ESG compliance of QA agencies. The Committee needs to base its decision on the review panel's report and is, at the same time, expected to ensure the consistency of its own decisions and interpretation. Despite much progress having been made from the original 2005 version to the current 2015 version of the ESG, it is important to note that some provisions remain up to different interpretations.

In order to better specify which information it requires from an external review to make well-informed, fair and consistent decisions, the Register Committee published – first in September 2013 – a document to illustrate its “Practices and Interpretations” in working with the ESG. This later became the Policy on the Use and Interpretation of the ESG, with versions published in 2015, 2017 and 2020 (see section 3.3 on the latest revision).

In reviewing an application, the Register Committee makes an assessment of each standard and concludes on compliance, partial compliance or non-compliance. The Committee's decision is prepared by a team of two rapporteurs and a third rapporteur, who comments independently on the main rapporteurs' assessment. As a tool to support consistency, the Register Committee has used a compilation of Register Committee decisions sorted by standard, contained in a spreadsheet maintained by the EQAR staff.

The results from the regular feedback surveys as well as the current survey of QA agencies show that the remaining areas of concern are “transparency and interpretation of the criteria for inclusion” and “proportionate, consistent and fair decision-making”. The main reason are different conclusions reached by the review panel and the Register Committee on specific standards; the extent to which this has happened differs largely between standards (see Figure 9). The analysis of Register Committee decisions showed that the standards where conclusions differed most often are ESG 2.7 (Complaints and appeals), ESG 2.6 (Reporting), ESG 3.1 (Activities, policy and processes for quality assurance) and ESG 3.3 (Independence).

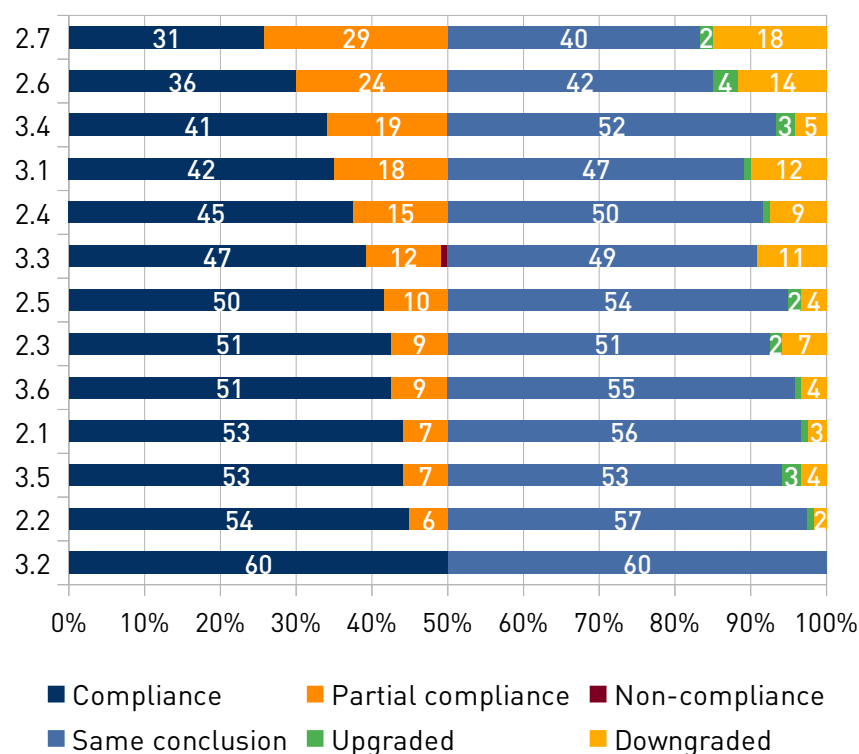


Figure 9: Register Committee decisions vs review panel conclusions

While the Register Committee has been keen to make its expectations and interpretations explicit and transparent, the standards vary in breadth and type of issues covered. In addition, the agencies vary considerably in volume and diversity of their activities. This makes it hard, for example, to define generally and unambiguously where the bar lies between non-compliance, partial compliance and compliance¹⁸ with a standard.

The Register Committee seeks to strike a balance between respecting the judgement of the review panel, who have been on site and carried out the in-depth analysis, and ensuring consistency in its overall decision-making practice.

In cases where the Committee cannot follow a conclusion, the Committee usually seeks clarification from the review panel (and in exceptional cases from the concerned agency itself). The clarification received is usually sufficient to reach a conclusion. If the panel's conclusion on the compliance with a standard is not found persuasive, the Register Committee explains its reasoning in the decision.

If the reasoning for this difference in judgements is unclear or if it happens too often, it might indicate problems and lead to discontentment (amongst both agencies and experts), especially in (the actually most common) situations where the Register Committee conclusion is a “downgrading” from the expert panel's views. While this is a normal part of any similar external QA and de-

¹⁸ In addition, it should be noted that different scales are in use, many panels use a 4-level scale (full compliance, substantial compliance, partial compliance, non-compliance).

cision-making process based on peer review, it is nevertheless desirable for all sides to minimise such cases.

Conclusion

The criteria for registration and all other normative documents are published. In the interest of enhancing transparency, the Register Committee agreed to additionally publish a spreadsheet of precedent decisions by standard.

The Register Committee employs a thorough screening of applications and reports to ensure consistency. This, however, leads to occasions where the Committee's conclusions differ from those of the panel and these could be further reduced. In addition to training and briefing of experts (see above), the Register Committee also considered that a more detailed debriefing with coordinators and panels, allowing the opportunity to discuss cases where the RC conclusion differed from the panel's, would be helpful in order to better understand and try to achieve more convergence in the future.

3.7 Reporting

Standard 2.6: Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

The responsibility for the quality of review reports rests with the coordinator of the review and the selected review panel members. The Procedure for Applications, the Terms of Reference (or Eligibility Confirmation) and the Guide for Agencies include provisions and clarifications regarding the content and structure of the review report.

The Register Committee was invited to provide feedback from its experience of working with reports from the ENQA-coordinated reviews as part of the external review of ENQA Agency Review processes. The Committee was generally satisfied with the improved quality of ENQA panels review reports. The Committee noted that the reports generally provide sufficient basis for its overall decision-making.

The Register Committee decisions have been published in full since 2013, together with the review report, eventual clarification requests and responses, as well as any other documentation that was considered.

Conclusion

The Register Committee's decisions are publicly available, but it is not clear to what extent they are (or could be) used by others than the agency concerned. One reason is that they are not easily comprehensible to those with a lack of expertise in external QA.

The Committee will consider in the future a more user-friendly display of the decisions and conclusions on the agency's registration on the website, e.g. a summary of conclusion or table of compliance added to the agency's Register entry.

3.8 Complaints and appeals

Standard 2.7: Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

EQAR has in place an Appeals Procedure: applicant QA agencies may appeal decisions of the Register Committee on procedural grounds or in case of perversity of judgement. Since 2008, EQAR's Appeals Committee has considered 5 appeals by registered agencies:

- 1 appeal (IEP) was against a rejection of an application for registration, the appeal was allowed and the RC ultimately decided to approve the application;

- 4 appeals were rejected: 3 (MÜDEK, QANU, AKKORK) challenged a rejection decision and 1 (A3ES) challenged a partial compliance conclusion of a nevertheless positive renewal decision.

The timing for the submission (90 days) and consideration of appeals could be shortened in the future so as to allow for a more expedient decision on an agency's registration i.e. in some cases a final rejection decision could only be published a year after it has been taken by the Register Committee.

EQAR's Complaints Policy allows individuals or organisations to raise substantiated concerns about a registered agency's compliance with the ESG or the external review process. This process is, however, not equivalent to what standard 2.7 refers to and is addressed further in section 3.4 above.

Complaints in the sense of ESG 2.7 would mean to allow agencies to make a complaint about the agency review process, EQAR's processes or those carrying it out. Currently, EQAR has no formal process for this other than the ongoing collection of feedback through a survey sent to applicants after their application has been decided upon. Neither does EQAR require review coordinators to have a complaints process.

Conclusion

The appeals process has served EQAR's purposes well, even though there is some room for streamlining it in terms of timing and encouraging clear argumentation.

EQAR could consider updating its procedures to allow QA agencies to raise in a formal manner any concerns with their application and review processes. Additionally, EQAR could require that review coordinators provide a process for complaints by applicant agencies.

4. How EQAR contributes to the EHEA – Transparency and Information

This chapter addresses EQAR's **Strategic Goal 1**:

EQAR provides reliable and widely-used information on registered quality assurance agencies as well as on which higher education institutions or programmes have been subject to external quality assurance in line with the ESG.

Figure 10 shows QA agencies' and EQAR members' feedback how well the activities earmarked under this Strategic Goal have been addressed.

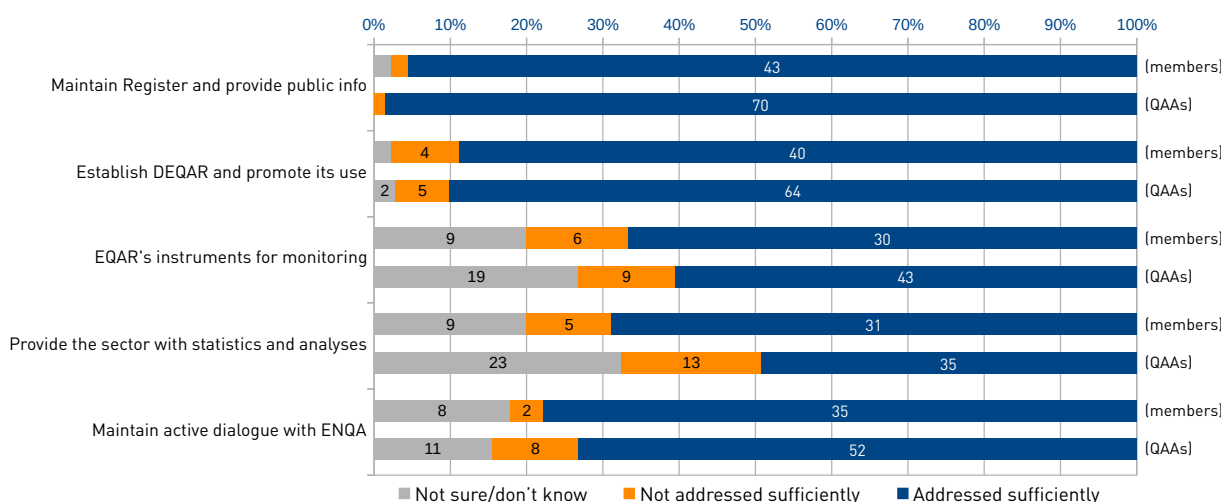


Figure 10: Feedback on activities under Strategic Goal 1 – Transparency and Information

4.1 Database of External Quality Assurance Results (DEQAR)

Activity: Establish a database of external quality assurance results and promote its use by different stakeholders

Indicator: Number of and feedback from visitors to the EQAR website and the database of external quality assurance results (DEQAR)

Background

Discussions on whether EQAR should provide a public database of quality assurance results (e.g. evaluation reports, accreditation decisions, etc.) came up as early as 2010. Initially, this was often simplistically referred to as a “database of accredited study programmes”. In its Strategic Plan 2013-2017, EQAR committed to explore the feasibility of such a database. The Crossroads database, managed by the European Consortium for Accreditation (ECA), was an important precursor and EQAR could build on the lessons learned from it.

The EHEA policy goal to achieve automatic recognition gave traction to these demands, as many actors saw quality assurance as a building block to create the necessary trust; a database would allow everyone to find out with ease which institutions/programmes are quality-assured. The 2015/16 self-evaluation of EQAR included the recommendation to “develop specifications for a possible database of quality assured higher education institutions or programmes” and to estimate the long-term operational costs.

This was taken up in the subsequent Strategic Plan and Work Plans, and EQAR prepared a report on the feasibility of such a database and an operational model. Those were presented at the EQAR Members' Dialogue 2016. The 2017 General Assembly decided to go ahead with the database and revised EQAR's membership fees to ensure its long-term sustainability.

DEQAR was launched in 2018 during the Paris EHEA Ministerial Conference. The initial establishment of DEQAR was supported by an EU-funded Erasmus+ project grant; currently, a second EU-funded project, DEQAR CONNECT, focuses on enhancing DEQAR's comprehensive coverage and linking up with other tools.

Architecture

The operational model proposed a lean approach: to gather only the data actually needed and to build on existing data sources as much as possible. In particular, DEQAR builds on institution data already available through the European Tertiary Education Register (ETER).

Other important design principles for DEQAR were that:

- information is provided free of charge and as open data;
- information must be accurate, comprehensive, up-to-date, easily accessible and understandable;
- institutions are equally represented no matter if they are accredited/audited at institutional level or have their different programmes accredited;
- all EQAR-registered agencies must be able to contribute and choose from different suitable technical solutions.

Basic information on higher education institutions is managed by EQAR, based on data from ETER, OrgReg, national authorities and QA agencies. Registered agencies upload information on quality assurance reports manually through a web interface, by uploading CSV files or by using a REST API¹⁹.

All data is publicly available on the EQAR website, can be downloaded as a whole or accessed through a REST API freely²⁰.

Current situation

As of April 2021, 41 of 50 registered agencies participate in DEQAR, providing over 58 248 reports on 2 768 higher education institutions (see Table 2). For 21 EHEA systems, DEQAR's coverage is comprehensive in that reports are available on at least 50% of the HEIs in the country/region.

	Reports	Institutions	Countries
EHEA	57 684	2 649	42
Outside EHEA	576	119	39

Table 2: Reports and Institutions in DEQAR (April 2021)

The DEQAR section is the most frequently visited part of EQAR website, accounting for 33% of the website's traffic (see section 4.1 for details).

According to the survey results, 90% of respondents found that the strategic goal of establishing a database for external QA and its promotion by different stakeholders has been sufficiently addressed by EQAR, with no major variation between members and QA agencies.

The detailed survey results confirm that EQAR members consider it important to see information about their system in DEQAR: 19 EHEA governments found that very important, 16 important, 3 somewhat important, only 1 not important at all.

The survey also explored how QA agencies consider that DEQAR adds value in their work. In their

¹⁹ Representational state transfer (REST) application programming interfaces (API) are a convenient way for software developers to communicate with services via standard internet protocols. They are based on open standards and represent a de-facto standard approach for such services.

²⁰ See <https://www.eqar.eu/qa-results/download-data-sets/> and <https://www.eqar.eu/qa-results/connect-to-api/>

textual answers, agencies referred mainly to (a) recognition of agencies' work in the international area, (b) increasing the visibility of domestic HEIs, (c) expanding of the reach to broader masses and promoting reports to more HE stakeholders, (d) facilitating recognition of foreign degrees, and (e) peer learning.

Website statistics and feedback

The EQAR website underwent a thorough re-structuring and a full redesign in early 2018, shortly before the launch of DEQAR. In 2020, the EQAR site saw ca. 5 000 visits generating ca. 11 400 unique page views monthly.

The launch of DEQAR has clearly had a high impact, multiplying the number of monthly visits by a factor 2.5 – 3 (averages for 2020 compared with the year prior to the launch). DEQAR accounts for approximately one third of the total traffic measured in page-views (see Figure 11) and has become the most visited section of EQAR's website.

In the surveys of (potential) members and QA agencies, 83% of QA agencies and 78% of members considered that information on the EQAR website was easy to access. The remaining respondents found it "somewhat" easy to access, while no respondents chose "no".

While many survey respondents stressed also in comments that they found the website clear and well-structured, a few respondents pointed to possible improvements and noted that some information is easier found through a search engine than by navigating directly through the EQAR website.

The feedback of other users is more difficult to elicit. In the last self-evaluation, a general survey of website users did not attract a sufficient number of responses and was therefore not repeated. Similarly, a comprehensive public survey launched together with DEQAR in May 2018 attracted very few responses.

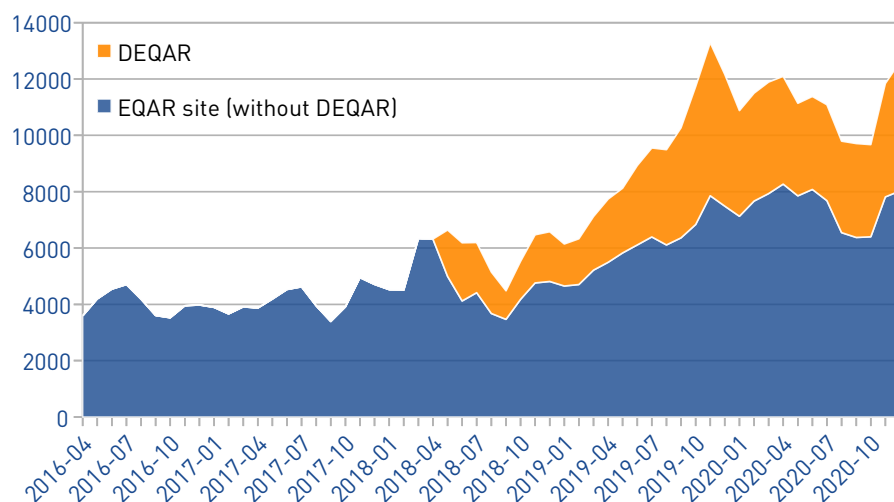


Figure 11: EQAR website – unique pageviews of DEQAR and other pages

One indicator is a "micro survey" that has been shown on all DEQAR-related pages, as an alternative to the "long" survey that was discontinued. Between April 2019 and January 2021, this survey was filled 94 times. 42% of respondents could find all or most information, 13% only some and 45% stated they could not find the information they were looking for. A good deal of respondents left some comments, which mainly points to two reasons why users could not find information: (a) they were looking for a specific institution that does not feature in DEQAR or (b) they were looking for information that DEQAR never set out to provide, e.g. tuition fees of specific programmes, entry requirements, contact details of staff, language of instruction. A few comments pointed to technical difficulties (e.g. broken links) that could be solved.

Suggestions for future priorities

Interestingly, the positive feedback is combined with a perceived need for enhancement: DEQAR is the area of activity with the clearest majority expressing a need for enhancement (31 of 45 respondents in the members surveys would like to see some or a lot of enhancement, 7 saw no need for enhancement and 7 were not sure).

Some of the governmental respondents highlighted the **need for improved coverage** of DEQAR in the upcoming years. One governmental representative hoped that DEQAR would record all accreditation decisions taken by EQAR-registered agencies in 2 – 3 years. Another governmental member asked:

How come some EQAR-registered agencies are not “playing the game” yet, hence resulting in missing QA reports in the database? Is it a technical issue about IT infrastructures from them?

Reassuringly, most of those QA agencies that have not yet uploaded reports to DEQAR are planning to do so: only two agencies stated in the surveys that they are not participating in DEQAR and are not planning to either. It is worth noting that one of those stated this was not important for the national actors, even though the ministry from the same country found it important to feature in DEQAR.

From the experience so far, EQAR has learned that technical issues are indeed an important hurdle, especially for larger agencies with an output of more than a few dozen reports a year. The strong need of assistance with IT matters became visible in a survey of the 15 QA agencies participating in the DEQAR CONNECT project in April 2020. It showed that agencies need assistance with establishing their own databases, understanding the DEQAR data model and developing software (API clients) for automatic synchronisation.

Content-wise, some members and agencies saw a need for **updating the data model and type of information presented** in the database. One frequent request was for an English summary of reports to be made available. When the ESG were revised in 2012-2015, it was discussed extensively whether the ESG should include requirements on the report language or the preparation of summaries. It was agreed not to impose any requirements in that regard. Hence, it remains at each agency’s discretion whether or not to produce an English summary. DEQAR could, however, make sure that such summaries are well visible if they are available.

Other respondents suggested to make better distinctions between different types of reports (i.e. programme vs institution, evaluation vs accreditation, QA of flexible learning paths, traditional modes of studies etc.) and, more generally, to follow new developments and changes in the European quality assurance landscape. These comments underline the importance of constantly reviewing whether DEQAR adequately represents the reports and results of a dynamic quality assurance sector.

With respect to improving the role of DEQAR in enhancing the EHEA, governmental members and observers mainly pointed to the need of (a) enhanced collaboration between EQAR and ENIC-NARICs and (b) **establishing interoperability** with other HE databases. As part of the DEQAR CONNECT project, EQAR has so far worked with 4 ENIC-NARICs to integrate data into their workflows, created an interface to the Europass Digital Credentials Infrastructure (EDCI) and initiated a dialogue with other European initiatives in the field of higher education data, the Higher Education Interoperable Data Initiative (HEIDI).

Conclusion

DEQAR has proven to be a successful initiative that is regarded as valuable across EQAR’s stakeholders. Continued efforts are needed to increase the coverage of DEQAR, in particular by supporting those agencies that are not yet participating at all and those that wish to “upgrade” their link. In addition, EQAR needs to ensure that DEQAR keeps pace with innovations in European quality assurance, and continues to represent QA results adequately in light of these develop-

ments.

The number of visitors to the EQAR website has evolved in a very satisfactory way, thanks to DEQAR. Qualitative feedback is difficult to elicit beyond those EQAR has direct contact with (members and registered agencies), additional efforts could be dedicated to that dimension.

In order to establish further links and connectivity with other initiatives, especially in the area of digital credentials and with study portals, pursuing the dialogue on a Higher Education Interoperable Data Initiative (HEIDI) remains a priority for EQAR.

4.2 Analyses based on Register Committee decisions and agencies' activities

Activity: Use analyses of the Register Committee's decisions as well as the information available on registered agencies and their activities to provide the sector with statistics and analyses

Standard 3.4: Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

EQAR accumulates a substantial amount of information from its core register function and processes, data collected annually from registered agencies and the monitoring of legal frameworks for external QA in the EHEA. Based on the Register Committee's decisions on ESG compliance, the Annual Reports have included a basic analysis; in 2018 EQAR published a more comprehensive analysis, shedding light on areas where ESG compliance is frequently challenging.

Furthermore, EQAR has for the past years prepared analyses (previously part of the Annual Reports, since 2020 a separate Policy Brief) on the registered QA agencies and their activities in order to provide the sector with relevant and up-to-date information. These are based on annual updates on agencies' external QA activities as well as DEQAR data. The analyses are accompanied by interactive visualisation tools on the EQAR website.

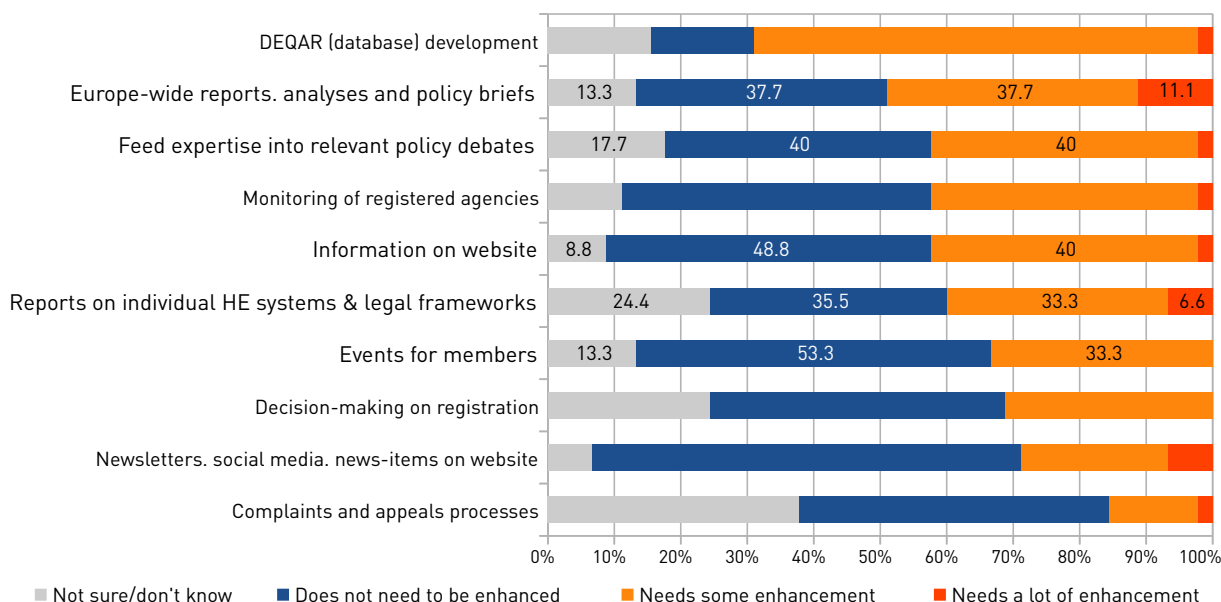


Figure 12: Areas for enhancement (members and potential members)

The surveys and discussions with EQAR members reflected a clear demand for more analytical output from EQAR. One of the two work areas (next to monitoring) that the largest number of members as well as QA agencies considered EQAR has “not addressed sufficiently” or were unsure about was “providing the sector with statistics and analyses”. The comments noted that existing analyses were not sufficiently well-known, but also that interesting data and information held by EQAR remained “under-utilised”.

The website statistics seem to corroborate that: only ca. 4% (July – December 2020, Annual Report not counted) of visits to the EQAR website come across these various analyses. The statistics also show that those who do come across them are more intense users, spending more than twice as long on the website on average and visiting twice as many pages. At the same time, EQAR members are largely satisfied with the communication through newsletters, social media and the website: this is the area with the least need for enhancement identified in the surveys.

The format of **relatively concise policy briefs**, similar to the first one published in June 2020, seems to be appropriate: both countries and stakeholders see a need for “punctual short briefings” on the “state of the art” of external QA in Europe and key developments.

EQAR could, however, better exploit its various data sets, e.g. cross-referencing statistics from DEQAR, contextual information on national QA systems, the Bologna Process Implementation Report and external data sources, e.g. ETER data on higher education institutions.

While a number of potentially interesting topics have been brought up in surveys and discussions, it needs to be borne in mind that EQAR has a specific role as a gatekeeper serving the public interest, rather than a “representational” role. As a gatekeeper, EQAR nevertheless builds up significant expertise and also brings together “all different players” in a unique way.

Information and analysis from EQAR could be relevant for a wide range of users, but the work of EQAR should have a clear profile and be distinguishable from the activities of the E4 or other European organisations. In the surveys and subsequent discussions, it was underlined that EQAR’s analyses should offer a **clear added value and complement resources made available by others** (e.g. the E4 organisations), bearing in mind that EQAR’s resources are limited and duplication does not benefit the sector.

Considering its membership, EQAR focuses on governmental members, i.e. ministry staff involved in policy making who need ready-to-use, structured and especially reliable information. In the survey, members expressed the wish that such policy briefs strengthen the evidence base that policy makers have at their disposal and enable them to easily “look across borders”.

The contribution of EQAR should always be linked to the ESG and its register role. That is, EQAR analyses would, for example, be derived from its analysis of agency reviews, its knowledge base of external QA frameworks and information available in DEQAR. This already influences possible **topics**, which should be chosen to be relevant to policy making and policy revision, e.g. implementation of EHEA key commitments, cross-border quality assurance and how the area of external QA is reacting to new developments and challenges in HE.

Conclusion

EQAR has started to provide statistical and analytical information based on its registration processes as well as on its general monitoring of external QA in the EHEA. There is a clear wish for EQAR to enhance and better disseminate such information, to feed into and enrich the relevant policy debates with its experience and expertise, without steering policy itself and being misunderstood as a representative body.

The EQAR website, newsletter and social media presence are crucial to disseminate information on existing analyses. These channels serve EQAR well in reaching its members as well as QA agencies, but it could be useful to explore ways how to share such information with a broader range of stakeholders, reaching beyond the usual “insiders”.

When providing additional analyses and policy briefs on topics of relevance to current QA policy debates, EQAR should primarily be guided by the needs of its (governmental) members and ensure that it adds value to existing resources and analyses. The areas for analyses should be agreed in the Work Plan adopted by members, with EQAR’s focus naturally being on the European level.

5. How EQAR contributes to the EHEA – Trust and Recognition

This chapter addresses EQAR's **Strategic Goal 2**:

EQAR-registered agencies and their QA results are recognised across the EHEA. On that basis, qualifications that were subject to external quality assurance by registered agencies (whether at institutional or programme level) are recognised and, in line with national requirements, higher education institutions are allowed to work with a suitable registered agency to fulfil their formal external quality assurance obligations.

Figure 13 shows QA agencies' and EQAR members' feedback as to how well the activities earmarked under this Strategic Goal have been addressed.

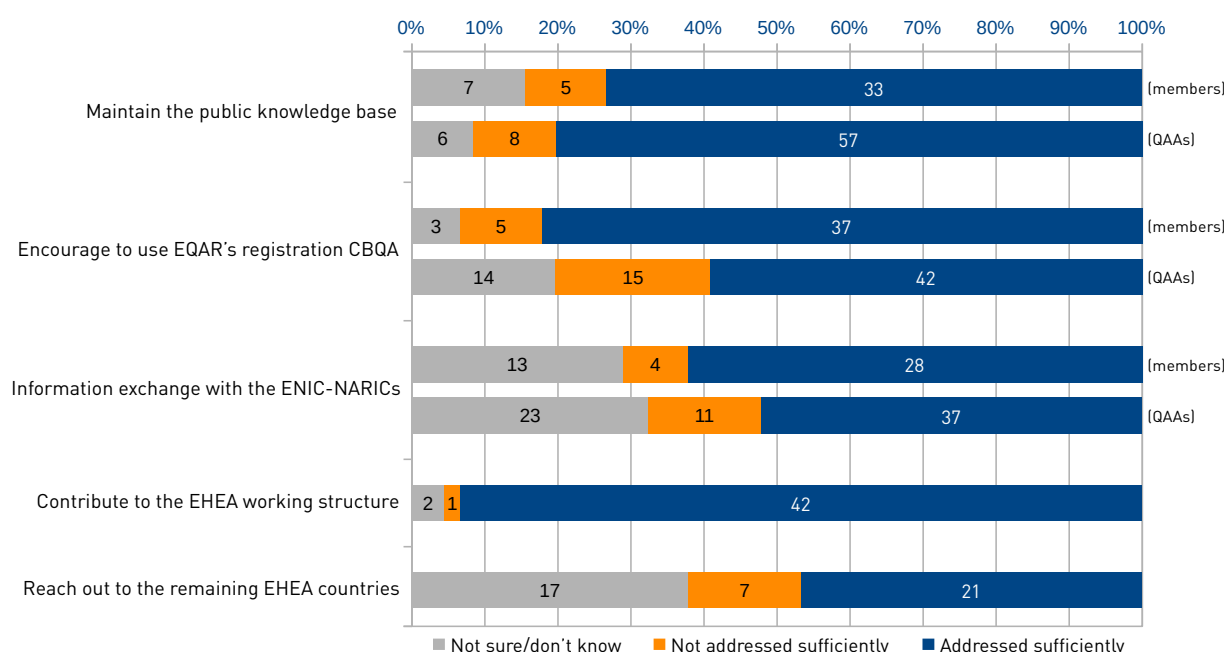


Figure 13: Feedback on activities under Strategic Goal 2 – Trust and Recognition

5.1 EHEA key commitment on quality assurance

Activity: Maintain the public knowledge base on legal frameworks for external QA and cross-border recognition, including the use of the European Approach for QA of Joint Programmes

Activity: Contribute to the EHEA working structure where relevant and appropriate in light of EQAR's specific role

For several years EQAR has provided country profile pages on its website, presenting key information on external QA for all EHEA countries. As part of the revision of the EQAR website in early 2018, EQAR also upgraded those country profiles to make the information more comprehensive and uniformly structured.

For each EHEA country, the following information is provided:

- General information on higher education (brief)
- Description of the national external quality assurance requirements, including whether the EHEA key commitment on QA is realised
- Regulations for cross-border quality assurance, including eligibility requirements for foreign agencies, conditions for the agencies' work and the recognition of reviews carried out by foreign agencies

- Availability of the European Approach for Quality Assurance of Joint Programmes
- Information on registered agencies operating in the country, their status and links to reports and decisions available in DEQAR

The launch of DEQAR has emphasised the importance of country profiles, as they include important contextual information on the diverse quality assurance systems in the EHEA.

Information is presented in different lists and maps:

- By fulfilment of the EHEA Key Commitment
- By number of institutions with reports in DEQAR
- By openness/recognition of cross-border external QA
- By availability of the European Approach for QA of Joint Programmes
- By governmental membership of EQAR

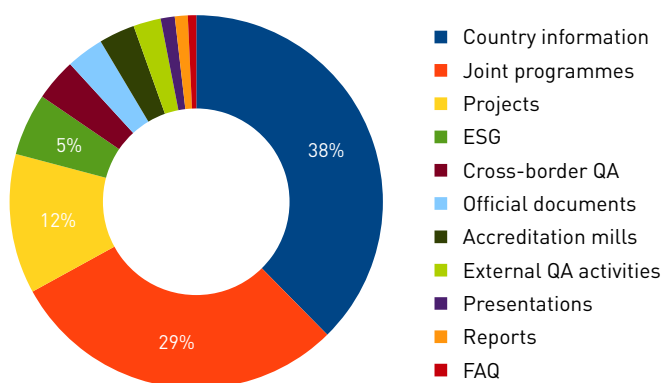


Figure 14: Knowledge Base – unique page views (2020)

The knowledge base is the third most frequently visited part of the EQAR website, after the Register and DEQAR. Country pages as well as information on the European Approach are accessed most frequently (see Figure 14), both are amongst the top 10 most visited pages on the EQAR website.

EQAR contributes actively to the BFUG Monitoring Working Group and its regular Implementation Report, as well as to the EHEA's Thematic Peer Group (TPG) on Quality Assurance.

EQAR's contribution to the EHEA working structure has achieved the most positive rating under the umbrella of "trust and recognition" (strategic goal 2, see Figure 13) in the surveys. Its importance was underlined also in discussions at the EQAR Members' Dialogue.

The increase in registered agencies reflects that countries succeed in realising the key commitment, either through establishing national QA agencies or working with other EQAR-registered agencies. While EQAR's contribution is only one of many enabling factors, of course, it can be hoped that it made an impact.

Some founding members noted that potential for further improvement remains, either in "supporting those lagging behind the development, supporting their institutions and raising awareness" (EURASHE) or in raising flags with member governments in such cases where the national framework prevents agencies from complying with the ESG. ENQA noted that EQAR has "an appropriate and also powerful channel" to the ministries in that regard, the potential of which has not yet been reaped.

In general, EHEA governments regard EQAR as an important tool to establish sufficient "common ground" between the diverse EHEA systems and thus to create trust. However, EQAR's registration processes focus on the compliance of QA agencies, with limited possibilities to fully take into account the HE system(s) in which agencies operate.

The Register Committee has encountered a number of cases where the nature of the legal framework made it difficult or impossible for the agency to comply with the ESG. For example, some agencies have limited room to determine the criteria they work with, as these are already defined in detail by the legal framework; in some cases the appeal system for higher education institutions is not under the agency's own responsibility; some legal frameworks cannot guarantee the publication of all reports.

It is becoming more frequent that several agencies share responsibilities in one HE system, and that an agency's work (and its compliance with the ESG) depends on system-level regulations or decisions made by other agencies. In Germany, the Netherlands, Spain, Switzerland and the United Kingdom, for example, different agencies are in charge of different elements in a suite of external QA processes, or even different agencies are responsible for different steps within a QA procedure (e.g. review by one agency, decision by another body).

Especially in such cases where there is no one-to-one match between country/system and agency, the disconnect of the registration process and EQAR's monitoring of QA systems is not ideal, even though agency review reports usually present the context and HE system(s) in which the agency operates. Moreover, in complex systems with several agencies – where some might be registered and others not – it might not be straight-forward to determine whether or not the system as a whole fulfils the EHEA key commitment.

Conclusion

The EQAR knowledge base has become a widely-appreciated tool for those interested in external QA in the EHEA; there is a clear need to continue work on that and to consolidate its position as the main authoritative reference for the implementation of QA commitments made in the EHEA.

In view of the diverse and multi-actor QA systems in the EHEA, the formal analysis of agencies' ESG compliance alone can be insufficient to draw a full picture. EQAR thus needs to consider how it can assure good monitoring and transparent assessment of how well each EHEA system creates the necessary conditions for ESG compliance in theory and practice, and how this knowledge and insight can be better linked with the agency review and registration process.

Next to this, EQAR could engage into a more direct dialogue with countries about their system, so as to support countries in creating the right conditions for ESG compliance and the use of the Register for cross-border cooperation.

This might include an "alert mechanism" in cases where the national framework does not allow for the agency to be substantially compliant with one or more of the ESG standards. For example, EQAR could inform the EQAR governmental representative or the concerning authority about the matters that affect the agency's compliance with the ESG and its application to the Register, and offer support through dialogue with the member country. If this cannot be resolved, the matter could be discussed in the suitable EHEA groups.

5.2 Cross-border recognition of quality assurance results

Activity: Encourage EHEA governments to use EQAR registration as a basis to recognise external QA results and reduce duplication of efforts

Indicator: Number of countries allowing higher education institutions to use a suitable EQAR-registered QA agency to fulfil their external quality assurance obligations (legislation with reference to EQAR)

Indicator: Number of countries recognising decisions of all EQAR-registered QA agencies on joint programmes

Commitments to recognise external QA across borders have been made in various ministerial communiqués of the EHEA. EQAR's main means in this regards are (a) to monitor and make transparent the extent to which they are implemented and (b) to facilitate and contribute to the exchange and peer learning between EHEA governmental representatives. Cross-border QA has thus been a key topic in most EQAR Members' Dialogues.

In 2013/14, EQAR carried out the project Recognition of International Quality Assurance Activity (RIQAA), which focused on the topic and generated valuable insights. Furthermore, EQAR has contributed actively to the EHEA working structures (see below) in order to ensure that the topic

stays on the agenda. As a long-term result, EQAR together with ENQA, ESU, EUA and EURASHE developed Key Considerations for Cross-Border Quality Assurance²¹ that would guide stakeholders engaging in cross-border QA. The result draws on prior experience in the topic and consultations with various stakeholders.

Development of legal frameworks

Currently, 31 of the 49 EHEA systems permit²² higher education institutions to request accreditation, evaluation or audit from a suitable foreign quality assurance agency. EQAR routinely groups countries (see Figure 15) into three groups based on whether and how they recognise QA agencies to carry out external quality assurance in their system:

1. Countries fully using the European framework: agencies are permitted to operate based on ESG compliance, evidenced by registration on EQAR, while additional requirements or constraints may be in place (currently: 19 HE systems);
2. Countries using own criteria: agencies are recognised based on other criteria or requirements, but EQAR registration is not used (currently: 12 HE systems);
3. Countries not open to cross-border QA: only one or more national agencies are permitted to carry out external QA (currently: 18 HE systems).

The number of countries in the first group (using ESG compliance/EQAR) has doubled from 9 to 19 in the period from 2015 to 2020, see Figure 15. While this is a positive development, it is worrying that 12 countries continue to rely on own, national criteria when recognising QA agencies, instead of the ESG as the EHEA's agreed framework.

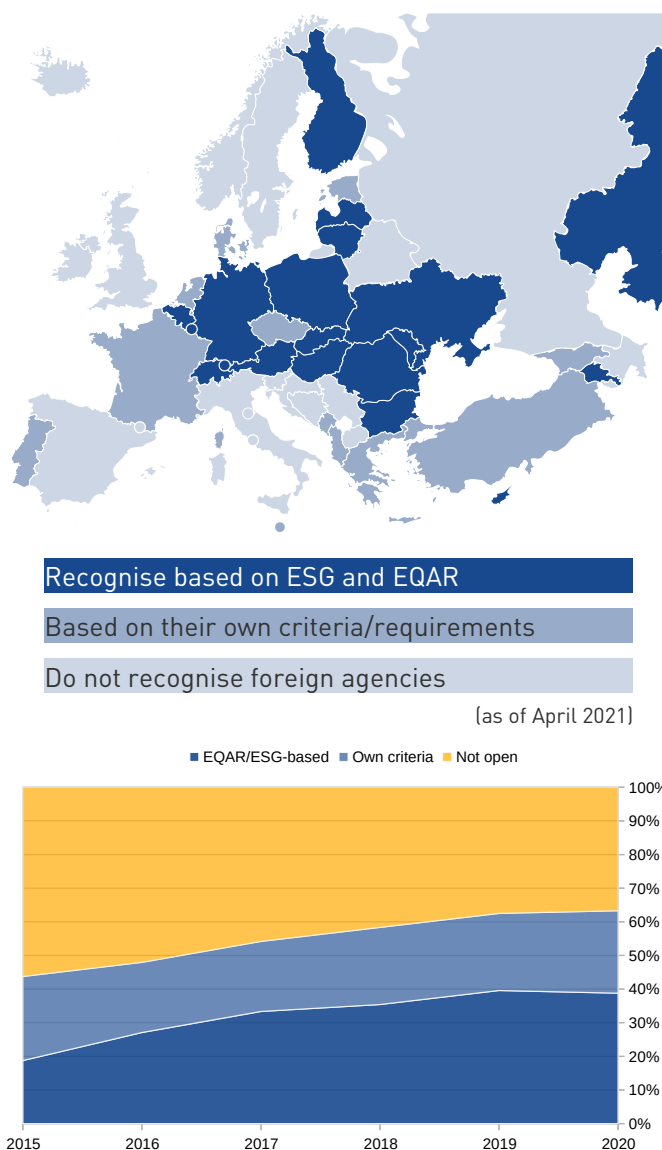


Figure 15: Openness to cross-border external QA

European Approach for Quality Assurance of Joint Programmes

The commitment by EHEA ministers to recognise quality assurance decisions by EQAR-registered agencies on joint programmes pre-date the adoption of the European Approach for QA of Joint Programmes, and consequently does EQAR's indicator.

Since the adoption of the European Approach in 2015, however, both EHEA policy discussions and

²¹ <https://www.eqar.eu/kb/cross-border-qa/key-considerations/>

²² In all cases, permitted/recognised refers to those external quality assurance procedures being accepted in the national framework as fulfilling the official external QA requirements of the country; it goes without saying that HEIs may always request additional accreditation, audit or evaluation from another agency of their choice, but on a voluntary basis.

EQAR's monitoring have focused on whether countries enable the use of the European Approach. In practice, use of the European Approach can be enabled in two ways:

1. Countries recognise the results of an external accreditation/evaluation/review by an EQAR-registered agency, performed in line with the European Approach; this is necessary where external QA at the programme level is required;
2. In those cases where no external QA is required at the programme level, HEIs are free to use the European Approach in their internal QA by default.

Since 2015, the EHEA has progressed from 21 to 30 countries allowing the use of the European Approach at least to some HEIs or in specific cases (see Figure 16). This does not mark an impressive progress, despite many countries making more ambitious statements in policy discussions.

Remaining barriers and EQAR approach

From discussions in the Members' Dialogues and elsewhere, remaining barriers include language use, concerns about the familiarity with legislation and understanding of the national circumstances.

Fewer, but yet some countries cite a general lack of trust towards foreign agencies; this is a matter that might warrant further careful attention by EQAR to establish why the current framework of the ESG and registration is still not regarded as sufficiently robust by some.

Even though country representatives frequently refer to **joint programmes as a special case** where recognition of quality assurance across borders was more urgent – to make the European Approach reality and reduce red tape in form of double accreditation – the figures (see above) do not show more progress in recognising cross-border EQA for joint programmes than generally.

The European University alliances might, however, be a game changer since they are expected to mainstream joint programmes to an unprecedented extent and countries seem to be well aware of the need to avoid bureaucratic burden for those initiatives. Many countries therefore expect that European University alliances can help identify obstacles and speed up the use of the European Approach.

Based on the surveys and discussions at the Members' Dialogue, EQAR members' views differ as to **how proactive EQAR should be in its approach** to promote cross-border recognition. Some caution not to overburden EQAR, others find it would not be appropriate for EQAR to push for legislative or policy changes at national level, while yet others stress that this clearly relates to implementation of commitments that ministers have already taken, and not to "new" policies.

Volume of cross-border QA activities

In addition to legal frameworks, EQAR monitors the volume of **cross-border external QA activities** by the registered agencies. Two thirds of the EQAR-registered agencies regularly carry out cross-border external QA (see Figure 17).

The average share of the cross-border external QA activities compared to the 'home reviews' is low with 6-8% across all agencies, but varies strongly between a few QA agencies with a substantial share of cross-border activities, and a large majority of QA agencies where cross-border activities represent a rather small share.

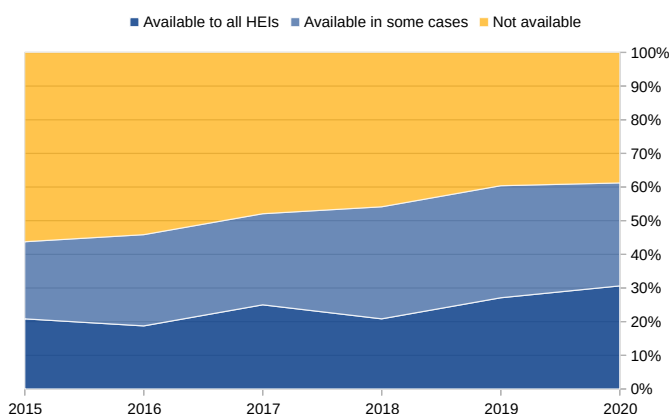


Figure 16: Countries where the European Approach is available to HEIs

Cross-border reviews are most often carried out in countries that do recognise the activity of EQAR-registered agencies as part of the regular quality assurance framework (i.e. Romania, Kazakhstan, Switzerland, Luxembourg, Germany). Yet, voluntary external QA activities (not recognised as part of the obligatory QA system) represent a considerable phenomenon across the EHEA.

Remarkably, in 2019 the volume of cross-border external QA in HE systems outside EHEA surpassed the number of cross-border reviews carried out within EHEA.

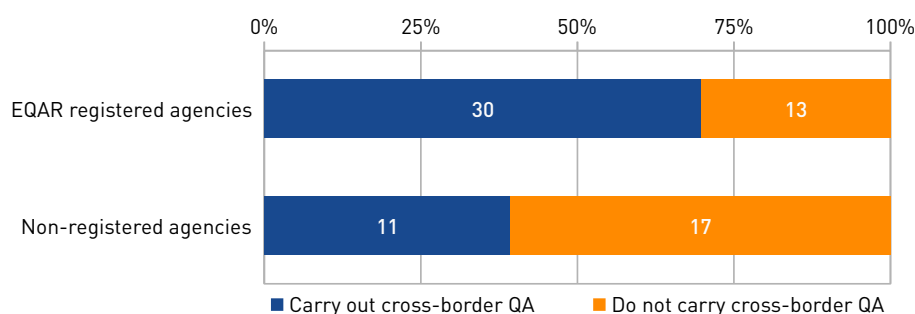


Figure 17: Registered and non-registered agencies active in cross-border QA

Conclusion

EQAR registration has become a reliable quality mark for trustworthy and professional quality assurance agencies and is increasingly used to recognise agencies for cross-border operations, also in calls for tenders for higher education reviews. However, it requires attention why some countries remain hesitant to accept the European framework as a sufficient basis for trust and recognition of registered QA agencies across borders.

In particular, the progress made in allowing the European Approach has not been satisfactory; this is likely to inhibit to enhance trans-national cooperation in the EHEA, e.g. the European University alliances.

While it is not in EQAR's own power to achieve changes, there is consensus that EQAR's role is to share information and expertise on cross-border QA more actively with countries and to support EHEA countries in implementing the agreed commitments. Members expect that EQAR continues its efforts to promote trust in the EHEA's agreed framework and recognition of cross-border QA, to facilitate dialogue and peer-learning between countries.

5.3 EHEA key commitment on recognition

Activity: Maintain the information exchange with the ENIC-NARIC networks to promote the role of external QA and EQAR to support (automatic) recognition of qualifications

Indicator: Number of countries using external quality assurance in line with the ESG, by an EQAR-registered agency, as a sufficient condition for recognition of qualifications

EQAR's work closely relates to the EHEA key commitment on recognition and the goal of automatic recognition in the EHEA. This dimension has come more into the focus since the launch of DEQAR.

The amount of comments from survey respondents linking DEQAR to the (automatic) recognition agenda is remarkable. A large number of QA agencies see participation in DEQAR as an important tool to enhance recognition of HEIs and programmes they accredit, evaluate and audit. Comparing with the 2015 survey of QA agencies (see Figure 6 in section 3.1), this factor has seen the largest increase amongst motivations seen as relevant for seeking EQAR registration.

There are frequent exchanges between EQAR and the ENIC-NARIC Networks, which are highly appreciated by those aware (one non-member government noted that "the opinion of EQAR is ap-

preciated in ENIC-NARIC and BFUG meetings as the opinion of an expert institution which contributes to the maintenance of quality assurance in EHEA”). A substantial number of survey respondents – especially among QA agencies – are, however, not very aware of these exchanges, see Figure 13.

Even though contacts with the ENIC-NARIC Networks have been active for considerable time, they did not go beyond general information exchange and contribution to seminars and other activities for some time. These were mutually useful, but did not always yield tangible results that could be showcased.

As part of the DEQAR CONNECT project²³, EQAR partnered up with four ENIC-NARICs (from France, Italy, the Netherlands and Romania) to explore a direct, automatic integration of DEQAR information in the centres' recognition applications and workflows. Even though work in progress, the experience so far suggests this opens opportunities for meaningful, hands-on cooperation.

In addition to ENIC-NARICs, also individual HEIs and employers have a major role in recognition practice. Thus far, contacts between EQAR and recognition/admission officers at HEIs have been limited.

While there is clear evidence that quality assurance is considered in recognition decisions nearly everywhere, EQAR is not aware of detailed studies that could be used to measure the indicator in a narrow sense, i.e. what difference it makes in formal and practical terms whether quality assurance has been carried out in line with the ESG.

For example, the 2019 monitoring report on the Lisbon Recognition Convention²⁴ shows that in 25 of 32 countries “quality/accreditation” is one of the assessment or recognition criteria mentioned in legislation, and 49 of 50 consider the absence of accreditation/QA a “substantial difference”. There is, however, no difference made between quality assurance aligned with the ESG or not.

Over the past years, the goal of ensuring “automatic recognition” of qualifications has been reaffirmed both at EHEA²⁵ and EU level. In that regard, the importance of quality assurance, the European framework set by the ESG and the monitoring of its implementation by EQAR have featured prominently. Quality assurance mechanisms are described as a prerequisite, creating the necessary transparency and trust in each other's higher education system that would pave the way to automatic recognition.

In the EU Council Recommendation²⁶, for example, Member States set out a number of conditions to be fulfilled to realise automatic recognition, including that:

external quality assurance is carried out by independent quality assurance agencies registered, or moving towards being registered, with the European Quality Assurance Register and which thus operate in line with both the Standards and Guidelines for Quality Assurance in the European Higher Education Area and the European Approach for Quality Assurance of Joint Programmes.

Conclusion

EQAR's exchange and cooperation with ENIC-NARIC networks and centres has been active, but more tangible results would strengthen those and make them better visible.

These could be achieved by more hands-on projects that promote the systematic use of QA in-

²³ <https://www.eqar.eu/about/projects/deqar-connect/enic-naric-integration/>

²⁴ Monitoring the Implementation of the Lisbon Recognition Convention, 2019, <https://rm.coe.int/monitoring-the-implementation-of-the-lisbon-recognition-convention/168093b52f>

²⁵ Bucharest, Yerevan and Paris Communiqués, <https://ehea.info/page-ministerial-declarations-and-communicues>

²⁶ Council Recommendation on Automatic Recognition, [https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568891859235&uri=CELEX:32018H1210\[01\]](https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568891859235&uri=CELEX:32018H1210[01])

formation in recognition and make good use of the European QA framework, similar to what has been piloted in the DEQAR CONNECT project. The policy goal of automatic recognition and the existence of DEQAR form excellent pre-conditions for this.

The absence of detailed studies or reports makes it difficult to assess progress in regard of the indicator. With its current resources, EQAR would not be able to organise own studies into that either.

While recognition-related policy documents give clear attention to quality assurance, it is sometimes unclear how the expected level of trust differs between quality assurance that is demonstrably aligned with the ESG, versus a national quality assurance system not (yet) aligned to the ESG.

Given the roles of individual HEIs and employers, it is not sufficient to reach out to ENIC-NARIC centres alone. EQAR has close links with its founding members EUA and EURASHE, and could aim to reach out more directly to HEIs, e.g. to inform on the availability of DEQAR and its potential use in the recognition process.

5.4 Major developments and changes in the EHEA

Terms of Reference: Are EQAR's processes well-equipped to respond to the growing diversity of quality assurance arrangements catering for the increasingly diverse higher education provision across Europe?

Digitalisation of higher education

The COVID-19 pandemic, which forced higher education institutions across Europe to shift to “emergency remote teaching”, has also affected the work of QA agencies and of EQAR itself. Most of the sector expect that the experience made during the pandemic will accelerate digitalisation strategies and plans significantly also beyond the pandemic.

Quality assurance agencies across Europe have adjusted to the increase in digitally-delivered HE as well as their own work, e.g. on-line site visits or similar formats. While this has certainly not been without challenges, experience so far shows that the ESG are a sufficiently flexible and resilient framework, and that agencies have been able to work within that framework despite the changes they had to make²⁷.

EQAR published a notice to clarify matters of immediate concern at the beginning of the pandemic, in particular to announce flexible arrangements for agency review schedules as well as to clarify the understanding of the site visit requirement in the ESG.

QA agencies have successfully applied the ESG in the quality assurance of digitally-delivered higher education, already long before the pandemic. It has emerged as a shared view of most players in the sector that the ESG themselves suffice as a normative framework for the EHEA, and that their provisions are entirely applicable to digital higher education.

This has been proven in practice by many QA agencies that successfully applied the ESG in that context. Based on that, good practices have been collected and published by various organisations (e.g. ENQA, EADTU) to provide non-binding guidance.

Diversification of qualifications and credentials

Current EHEA and EU policy debates show high attention to an increasing offer – by higher education institutions as well as others – of micro-credentials²⁸ or other short learning units that are smaller than traditional, full degree programmes. Even though such offers are far from new in

²⁷ See for example collection of experiences by ENQA: <https://www.enqa.eu/covid-19/>

²⁸ In the following, the term “micro-credentials” is used generically for all types of short learning programmes, irrespective of how exactly they might be called.

many contexts, the attention at European level has risen in recent years.

Micro-credentials already exist in most EHEA education systems²⁹. They come in various shapes and sizes, offered by HEIs, other public or private providers, or by both in cooperation. Moreover, regulatory approaches differ greatly between countries.

The ESG emphasise that they are applicable to higher education in the broadest sense. The QA of micro-credentials provided by HEIs is thus clearly within the current remit of EQAR. DEQAR has, however, been designed mainly having in mind traditional full degree programmes so far.

Nearly all countries indeed consider the ESG applicable to micro-credentials, while there are differences to what extent micro-credentials are already “covered” by existing internal or external QA mechanisms. Most countries consider that programme accreditation would not be scalable to individual micro-credentials and express preference for an institutional approach to external QA³⁰.

Most QA agencies that were surveyed for this self-evaluation noted that their external QA activities did not cover micro-credentials offered by HEIs, although a significant number of them have plans in that regard. 23% of the surveyed agencies noted that micro-credential offers are covered by their external QA activities (e.g. institutional audits also address an institution’s micro-credential offer), another 15% have specific external QA processes for micro-credentials.

The European policy debate is still ongoing³¹ as to whether the ESG should also be used as a basis for micro-credentials by other providers (e.g. private companies, professional associations, NGOs, etc.).

Not surprisingly, some agencies consider that such offers are not part of higher education (and the certification thereof thus outside the scope of the ESG), while other agencies consider such offers as higher education in the broader sense (and thus align the certification of such provision with the ESG). 15 surveyed agencies noted that they already have external QA processes, e.g. certifications, for micro-credentials by non-HEI providers. While some of those are aligned with the ESG, the numbers are not huge so far.

Another scenario would be certifications based on emerging standards other than the ESG. Since EQAR’s role is very closely linked to the ESG, it would require thorough discussions by EQAR members – and probably a change of Statutes – for EQAR to embark on any role under a different standards framework. As there is no consensus yet if there should be standards different from the ESG, how they would look like or how they would relate to the ESG, it is impossible to discuss this further at this stage.

European Universities and other enhanced cooperation

Following the EU’s European University Initiative, closer transnational cooperation between HEIs in Europe is on the rise. The consortia selected and funded by the EU all have ambitious visions, often including new joint study programmes or micro-credentials, or turning existing study offers into a jointly delivered one.

It can be expected that this will also have effects beyond the selected group of European University alliances, and result in an increase both in the number and size of joint programmes in the EHEA (see also section 5.2 above).

Conclusion

The ESG themselves as well as EQAR’s processes have so far revealed to be resilient and adaptable enough to cope with new developments in higher education, whether induced by the current

²⁹ See Microbol project survey results: <https://microcredentials.eu/microbol-survey-report-available/>

³⁰ Ibid

³¹ See report from the European Commission’s consultation group: https://ec.europa.eu/education/education-in-the-eu/european-education-area/a-european-approach-to-micro-credentials_en

pandemic or otherwise.

While discussions on micro-credentials are still at infancy, some HEIs and QA agencies already use the ESG outside of traditional full degrees. It seems likely that micro-credentials will remain a relevant topic for European HE in the foreseeable future. EQAR could provide expert input these debates, for example through future policy briefs on how agencies apply the ESG in practice to external QA of micro-credentials.

Reports from such certifications should have a place in DEQAR when based on the ESG. Depending on how the use of the ESG evolves, adaptations could become necessary to show how non-traditional types of provision and providers can be included in DEQAR, and to distinguish such providers clearly from HEIs for the sake of transparency.

It is important that EQAR stays abreast of developments regarding any potential quality assurance frameworks outside the umbrella of the ESG, and how these articulate with the ESG.

Advancing cross-border recognition of QA results has already been a strategic priority for EQAR and is expected to gain relevance as a result of the European University initiative and similar forms of deeper transnational integration between HEIs.

6. Overview of conclusions

6.1 Strengths

- EQAR's membership and organisational structure generally fit its public interest role. The involvement of European governments as well as stakeholder organisations is assured, and the General Assembly and Members' Dialogue have become key opportunities for policy discussion on external quality assurance and the organisation's priorities.
- The introduction of an elected President allowed the organisation to have a representative who is independent of its members, can raise the visibility of EQAR externally and ensure stability and leadership internally.
- EQAR's independence is regarded as a crucial condition by most members and agencies. The organisational structure of EQAR safeguards the Register Committee's independence in deciding on ESG compliance and registration of agencies.
- The registration processes and the choice of monitoring processes fit the objectives of the Register. In the transition to the ESG 2015, EQAR was able to raise the attention given to ESG 2.1; this brought greater clarity to the value and meaning of EQAR registration and ESG compliance.
- DEQAR has become a successful initiative that is regarded as highly valuable by EQAR's stakeholders. The launch of the database was a major step for EQAR and required considerable resources, but also gave a strong boost to EQAR's role, given that it is more directly useful to a wider range of people.
- Both the ESG and EQAR's processes have revealed to be resilient and adaptable enough to cope with new developments in higher education, whether induced by the current pandemic or otherwise.

6.2 Weaknesses

- While the registration processes are generally perceived as transparent, clear and efficient, this is less so in situations where the Register Committee's conclusion differs from that of the panel after a thorough screening of the report to ensure consistency.
- EQAR's processes for monitoring changes in registered agencies are not widely enough known and understood. While most agencies report changes that occur, it is structurally difficult for EQAR to know whether changes might have taken place but were not reported.
- The Register Committee's published decisions are not easily comprehensible to those with a lack of expertise in the field.
- As most registered agencies have successfully gone through two or more subsequent reviews against the ESG in a row, repeating full reviews following the same "one size fits all" model risks becoming repetitive and contributing to review fatigue.
- Mechanisms for the internal quality assurance of EQAR's registration processes are in place, but have not followed a fixed cycle so far.

6.3 Opportunities

- EQAR's role is clearly recognised as part of the EHEA framework and the key commitments. Virtually all agencies operating in Europe, with very few exceptions, strive to align their work to the ESG and plan to seek EQAR registration in order to demonstrate that.

- In order to support the EHEA activities related to the key commitments, there is a high demand for Europe-wide monitoring and analysis on their implementation. The EQAR Knowledge Base has become a widely-appreciated tool and its further development may help EQAR to further consolidate its position.
- There is a clear wish for EQAR to feed its expertise and wealth of statistical and analytical information – based on its registration processes as well as its general monitoring – into the relevant policy debates.
- It is an agreed EHEA policy to base the recognition of QA agencies and their results on EQAR registration. In the context of the European Universities initiative, the need to advance cross-border recognition of QA results is expected to gain relevance.
- Since its launch, DEQAR has attracted a greatly increased number of visitors to the EQAR website. Large potential lies in establishing better connectivity of DEQAR with other initiatives, especially in the area of digital credentials and study portals.
- Activities that promote the systematic use of QA information in recognition, similar to what is being explored in DEQAR CONNECT, bear a potential to further EQAR's cooperation with the ENIC-NARIC networks and centres, and thus to promote good use of the European QA framework.
- Discussions on micro-credentials are still in their infancy, but are expected to remain a key topic in the European policy debate. This might serve as an opportunity to explore the flexibility and openness of the ESG, and therefore EQAR, in practice.

6.4 Threats

- The goals and objectives of EQAR are part of the ambitious vision the EHEA set out to realise, but their implementation is not in EQAR's own power – for example, when legislative or other changes are required at national level.
- EQAR's success in a wider sense is highly dependent on commitment, engagement and support by the EHEA governments. While EQAR has been successful in broadening its governmental membership, not all EHEA governments are on board yet.
- In view of the diverse and multi-actor QA systems in the EHEA, the formal analysis of ESG compliance at the agency level only can be insufficient to show the full picture how well a higher education system is aligned with the EHEA key commitments.
- The volume of QA reports in Europe will keep growing; various developments and innovations in European higher education will lead to changes in QA arrangements. DEQAR's usefulness depends on its ability to keep pace and adapt as necessary to adequately represent quality assurance results in light of these changing realities.
- Some countries remain hesitant to use EQAR and the European QA framework as a sufficient basis for systematic trust in and recognition of registered QA agencies' results across borders. In particular, the progress made in allowing the European Approach for QA of Joint Programmes has not been satisfactory; this is likely to inhibit transnational cooperation in the EHEA, such as the European Universities initiative.
- While recognition-related policy documents give clear attention to quality assurance, it sometimes remains unclear how the level of trust differs between quality assurance that is demonstrably aligned with the ESG, versus a quality assurance system that is not. This could undermine the importance of aligning the own system with the ESG.
- EQAR has successfully operated on modest resources. Any significant additional activities could not be implemented without adequate resources, either project-based or permanent.

6.5 Possible action points

In order to address the weaknesses and threats, and to capitalise on the opportunities, a number of possible action points were identified during the self-evaluation to be considered further:

1. Further develop EQAR's knowledge base in order to make the system-level insights clearer and more structured, as well as to better link those with the agency review and the registration process.
2. Share EQAR's information and expertise more actively within the EHEA to promote trust in the EHEA's agreed framework.
3. Better support countries in implementing the EHEA key commitment by facilitating dialogue, communication and peer-learning between and within countries.
4. Consider whether the responsibilities and composition of the Executive Board require attention in light of EQAR now being firmly established and the growing number of governmental members.
5. Take further steps to achieve more convergence of review panels' and the Register Committee's conclusions, for example through enhancing the training and briefing of experts, as well as a more detailed debriefing with coordinators and panels.
6. Develop the processes for monitoring substantive changes, in particular to assure that changes are reported as they occur and to allow a more graduated response in case of risks or shortcomings in ESG compliance.
7. Display the Register Committee's decisions in a more user-friendly way to enhance their usefulness for others than the agency itself.
8. Introduce a more targeted approach for the review of agencies that have already been positively assessed against the ESG twice or more often.
9. Formalise a two-year cycle for the review of feedback received on the registration processes, resulting in a brief public report/analysis.
10. Continue efforts to increase the coverage of DEQAR until all registered agencies publish all their reports and results in the database.
11. Pursue the dialogue on a Higher Education Interoperable Data Initiative (HEIDI) in order to facilitate the use of DEQAR information in other systems and consolidate its position as the authoritative reference for externally quality-assured higher education.
12. Stay abreast and address current developments in European higher education in future policy briefs, drawing on the practice of registered agencies, e.g. how the ESG are applied in practice for micro-credentials.

Annex

1. Key reference documents

General

- [EQAR Statutes](#)
- [Mission Statement](#)
- [Strategy 2018 – 2022](#)
- [Code of Conduct](#)
- [Internal Handbook](#)
- [Annual Reports](#)
- [Membership Fees](#)

Management of the Register

- [Procedures for Applications](#)
- [Policy on the Use and Interpretation of the ESG](#)
- [Eligibility of External Review Coordinators and Panels](#)
- [Complaints Policy](#)
- [Merger Policy](#)
- [Appeals Procedure](#)
- [Register Committee decisions \(chronological\)](#)

Contribution to the EHEA

- DEQAR
 - [Essential information](#)
 - [DEQAR CONNECT project](#)
 - [Background Report and Operational Model](#) (2016)
- [Analysis of Register Committee Decisions](#) (2018)
- [Policy Brief on External QA](#) (2020)
- EQAR Knowledge Base
 - [Country information](#)
 - [Cross-border recognition](#)
 - [European Approach for QA of Joint Programmes](#)
- [Current and past projects](#)

2. Survey results

Members and potential members

- [Multiple choice questions](#)
- Free text questions (except those who asked not to be quoted)
 - [Browsable view](#)
 - [Table view](#)

Quality assurance agencies

- [Multiple choice questions](#)
- Free text questions (except those who asked not to be quoted)
 - [Browsable view](#)
 - [Table view](#)

National HEI associations

[Browsable view](#)

Surveys carried out previously and other sources

- [Applicants feedback survey](#) (continuous)
- [Survey on the Policy on the Use and Interpretation of the ESG](#) (November 2019)
- [Briefing notes from the EQAR Members' Dialogue](#) (January 2021)

3. Recommendations of the 2010/11 external evaluation

The 2011 External Evaluation Panel made twelve specific recommendations³². The following section summarises how EQAR responded to those recommendations (text based on the 2016 self-evaluation report):

- i. The General Assembly should add strategic planning to its current list of functions. [Para 8.5].

The GA adopted the first Strategic Plan in 2013 and later the second Strategy 2018-2022. Its responsibility for strategic planning was clarified in the Rules of Procedure (see section 2.3)

- ii. EQAR should promote with the organisations nominating representatives to the General Assembly the benefits to EQAR of ensuring, as far as possible, that those representing them remain on the Assembly for three years renewable for a further three years [Para 8.6].

The GA took note of the recommendation. However, the member of the GA is the respective country/organisation, not a person. The representatives are not acting in a personal mandate and EQAR can thus only encourage continuity, but could not impose a fixed term.

- iii. Members of the Executive Board should serve an initial mandate of at least three years (currently two years) renewable for up to two times (currently three times) [Para 8.7]

- iv. Members of the Register Committee should serve an initial mandate of at least three years (currently two years) renewable for up to two times (currently three times) [Para 8.8]

The General Assembly decided not to change the 2-year terms, since a 3-year term could pose difficulties for some organisations. Practice has also shown that most members (of both the Register Committee and Executive Board) remain involved for several consecutive mandates, and often for the maximum term of eight years (4 terms of 2 years).

The need for continuity was further addressed by encouraging the E4 organisations to stagger the replacement of Register Committee members nominated by them.

- v. EQAR should clarify its current criteria for establishing prima facie organisational eligibility to apply for registration [Para 8.12]

The criteria were clarified with the first revision of Procedures for Applications, completed and in effect since 1/1/2013.

Criteria have remained substantially unchanged, but the distinction of activities within and outside the scope of the ESG has been clarified.

The 2015 revision of the Procedures further clarified the process of determining organisational eligibility, this was further improved and streamlined over time, ultimately changing the process to tripartite Terms of Reference replacing previously separate letters (see sections 3.3 & 3.4).

- vi. EQAR should enhance the transparency of its decision-making by:
 - making public the names of each applicant which satisfies organisational eligibility criteria; and
 - making public the Register Committee's decision on each application [Para 8.14]

The full publication of the Register Committee's decision was introduced in the 2013 revision of the Procedures for Applications, all decisions made since January 2013 are publicly available.

The 2015 revision of the Procedures introduced the publication of a list of withdrawn applications as well as the full communication with applicant agencies.

- vii. Observers should no longer be appointed to the Register Committee [Para 8.15]

³² See report section 8, pages 7 – 13, and appendix 6

The GA decided to keep five governmental observers on the Register Committee, which was perceived as useful to enhance transparency, accountability and ownership.

The GA changed the EQAR statutes to the effect that these observers would be appointed by the GA in the future, instead of the BFUG.

In order to increase the transparency and effectiveness of having observers on the Committee, observers have been invited to regularly report to the GA.

viii. Each element of EQAR [see Para 7.3] should evaluate formally its effectiveness on a regular basis [Para 8.16]

EQAR adopted a 5-year cycle for regular self-evaluations, while an external evaluation could follow every second self-evaluation, i.e. every 10 years.

ix. Consideration should be given to finding a way to give academics as a collectivity a voice in EQAR, which would help to embed quality assurance and the Register more firmly in institutions [Para 8.27]

Academics are represented in EQAR through their own dedicated stakeholder organisation, EI/ETUCE. EI/ETUCE is an EQAR member, represented on the General Assembly and nominates one expert to the Register Committee. In addition, a number of nominees and representatives of other organisations are active academics from European higher education institutions.

The feedback and discussions as part of the 2015/16 self-evaluation exercise did not suggest that academics are underrepresented in comparison to other groups, e.g. institutional leadership, students, policy makers or administrators. EQAR's relevance for and impact on teaching and learning is mainly determined by the ESG. The increased attention to the impact of QA agencies on teaching and learning, in connection with ESG Part 1 and standard 2.1, further strengthens the link between the work of EQAR and teaching and learning at grass-root levels.

Recently, through DEQAR EQAR offers an information tool that is more directly useful to higher education institutions, e.g. for recognition officers or academics seeking quality assurance information on other higher education institutions for different purposes.

x. EQAR should engage in dialogue with ENQA on a range of matters with a view to clarifying and making public:

- the differences in function and purpose of the two organisations;
- their respective interpretations of the phrase '... substantial compliance ...' with the ESGs; and
- their respective criteria for establishing organisational eligibility for registration and membership respectively [Para 8.31].

EQAR and ENQA share a mutual understanding of their respective missions, functions and purposes, and have each clarified organisational eligibility for registration and membership, respectively.

Formal meetings have been held between ENQA and EQAR annually, including the ENQA Presidency and the EQAR Register Committee Chair/Vice-Chair. These meetings add to numerous occasional contacts and meetings between ENQA and EQAR staff.

EQAR's interpretation of "substantial compliance" with the ESG has been made transparent through public documents (see section 3.6 for details) and has been regularly discussed with both ENQA and the sector.

ENQA's forthcoming changes in terms of decision-making on membership are expected to further clarify the roles.

xi. EQAR should be more pro-active in promoting its existence and the benefits of being on

the Register. This could include encouraging the E4 Group to be more proactive in promoting the existence of EQAR and the benefits of registration [Para 8.34].

Various measures have been taken in line with EQAR's Strategic Plan and annual Work Plans, including regularly organising a Members' Dialogue; active presence in the BFUG structures; contribution to QA-related events; maintaining contacts with members, agencies and stakeholders; regular newsletters.

The launch of DEQAR gave a boost to EQAR's visibility, as can be observed from a substantial increase in the number of website visitors for example.

The E4 organisations were involved in those activities and further promoted the existence and role of EQAR in their own activities, such as quality assurance-related studies and publications, the European Quality Assurance Forum (EQAF, regular contributions by EQAR) or other events organised by them.

xii. The General Assembly should appoint a high profile, independent President capable of raising the visibility and promoting the benefits of EQAR with key stakeholders. Such an appointment should be for a period of up to four years in the first instance [Para 8.35].

The position of President was introduced and the first election took place in 2017.

The change has been applauded by members, the EB and RC alike, confirmed in an evaluation that took place towards the end of the first mandate. In 2020, the President was re-elected for a further 3-year term.

4. Recommendations of the 2016 self-evaluation report

Mission and Role in the EHEA

To use the Strategic Plan to prioritise on which objectives EQAR's activities should focus.

The EQAR Strategy defines priorities for a 4-5 year period. Within that framework, a rolling Work Plan sets out specific activities undertaken by EQAR. It is revised and agreed by the GA annually.

To improve the information exchange with ENIC/NARICs as an additional way to build trust in higher education institutions that have been quality assured by a registered agency.

EQAR has been a very active contributor to ENIC-NARIC network activities and has actively co-operated with some centres in projects³³. The EHEA and EU-level debates on automatic recognition have facilitated this exchange greatly.

ENIC-NARICs have also been considered a main audience of DEQAR. The DEQAR project involved the Italian recognition information centre, CIMEA, as a partner, which assumed responsibility for outreach to other centres. The DEQAR CONNECT project includes four information centres from Italy, France, the Netherlands and Romania, which pilot integrations of DEQAR information in their workflows.

See sections 4.1 & 5.3.

To include on the EQAR website some general, contextual information on accreditation mills and degree mills, in order to help users to understand the issue and make use of the Register in that respect.

A [separate page](#) providing basic information on accreditation and degree mills has been part of EQAR knowledge base since 2015.

To maintain the active dialogue and communication at both official and informal level with ENQA, being the representative body of QA agencies and the most frequently used coordinator of external reviews.

EQAR and ENQA organise annual official meetings in addition to extensive contact at working level day-to-day; see also previous section.

Organisational Structure

To invite the governmental observers on the Register Committee to report to the General Assembly annually in order to increase the transparency.

An annual report by the observers has been a recurring item on the General Assembly's agenda since 2016; it is usually given as an oral report, in conjunction with the EQAR Annual Report and followed by a discussion.

To establish the position of a president, who does not hold functions in EQAR's members simultaneously, in order to raise the visibility of EQAR and to enhance stability and leadership internally.

This recommendation followed up to recommendation xii. of the 2011 external evaluation, based on a further discussion how to establish the position of President. The recommendation was implemented with the first election of a President in 2017; see section 2.1.

To continue EQAR's efforts to encourage non-member EHEA countries to consider membership.

EQAR has reached out to the remaining non-member governments on a continuous basis; see section 2.1 for details.

³³ See <https://www.eqar.eu/about/projects/>

Four EHEA governments have become members since 2016: Greece, Hungary, Italy, Slovakia. EHEA countries that are still not members are Andorra, Belarus, Holy See, Iceland, Russian Federation, San Marino³⁴, Serbia, Sweden.

To adopt a 5-year cycle for regular self-evaluations, with an external evaluation following every second self-evaluation, i.e. every 10 years.

This proposal was adopted and incorporated in EQAR's Strategy and Work Plans. The present exercise represents the third self-evaluation and is followed by the second external evaluation, following that proposed cycle.

Management of the Register

To ensure that EQAR's instruments for monitoring registered agencies' work and compliance with the ESG are well known by those concerned.

EQAR's main monitoring instruments are annual updates provided by registered agencies and substantive change reports. Annual updates provide mainly statistical data and feed into analyses; a further discussion of their impact and future developments can be found in section 4.2.

Substantive change reports have increased in numbers and relevance for EQAR's work. However, the surveys still indicate that EQAR's monitoring instruments are either not sufficiently well-known or not regarded as sufficiently effective; see section 3.4 for a further discussion.

Strategic Goals, Impact

To encourage EHEA governments to make full use of EQAR to recognise quality assurance results of EQAR-registered agencies, so as to reduce duplication of efforts.

Steps were taken through contribution to BFUG work and individual contact with governments; a thorough discussion of progress and limiting factors can be found in section 5.2.

The feedback from QA agencies, however, showed that the formal cross-border recognition of registered agencies' results is still considered insufficient and does not fully meet the expectations agencies have towards the agreed European framework.

To take efforts to increase EQAR's relevance to other stakeholder groups, particularly students and ENIC-NARIC centres.

EQAR has cooperated actively with the ENIC-NARIC networks as well as individual centres, see above.

With regard to students, EQAR has cooperated with ESU to provide information to student QA experts in the first instance. This has revolved considerably around DEQAR, which was seen as a step making EQAR more directly relevant and useful for students. The 2020 edition of ESU's Bologna With Student Eyes (BWSE)³⁵ analysis notes that "increased transparency of the quality of higher education for students" was the most notable impact of EQAR and underlines that DEQAR can provide useful information to students and student experts in QA.

To give more attention to the role quality assurance and the Register can play to support the recognition of qualifications.

In addition to the work with ENIC-NARICs (see above), EQAR has also contributed to policy discussions around automatic recognition. In particular, it has provided information on the European framework, the ESG and the potential role of DEQAR to facilitate automatic recognition, see sections 5.3 for details.

The link between EQAR and individual HEIs (in charge of recognition in many systems) remains indirect and limited.

³⁴ It should be noted that San Marino only joined the EHEA in November 2020.

³⁵ <https://www.esu-online.org/?news=bologna-with-students-eyes-2020>

To develop specifications for a possible database of quality assured higher education institutions or programmes (depending on the national system), in consultation with the relevant stakeholders, in particular the ENIC-NARIC networks, and to make an estimation of the long-term operational costs of such a database on that basis.

Specifications were developed and DEQAR was launched in May 2018; a detailed discussion can be found in section 4.1.

To monitor the use and application of the European Approach for Quality Assurance of Joint Programmes.

EQAR contributed significantly to monitoring by maintaining the knowledge base on legal provisions, creating a special page to give visibility to reports, providing input to various seminars and contributing to the Bologna Implementation Report.

EQAR's knowledge base is widely regarded as the main resource for information on the recognition of the European Approach in different EHEA countries, e.g. by the ImpEA toolkit³⁶.

Regrettably, the uptake of the European Approach remains very limited due to national provisions preventing its full use by all HEIs.

To improve the use of social media as a means to increase visibility and impact.

EQAR has maintained an active presence on LinkedIn, Twitter and Facebook.

The EQAR website underwent a thorough re-structuring and re-design; it was launched in early 2018 in its current format. See section 4.1 for details.

³⁶ <https://impea.eu/guide-for-self-evaluation-report/>