

Quality assurance and internationalisation

State of play and perspectives
for the future

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1. Introduction

Background

Internationalisation of higher education is at the heart of the history and development of the European Higher Education Area (EHEA). The common tools and frameworks, to be implemented in all signatory countries, aim to support mobility, recognition and cross-border cooperation. The European quality assurance framework is key to facilitating internationalisation as a basis for trust and transparency in higher education institutions, their learning and teaching activities, and the resulting qualifications awarded to students. The aim of a common framework for quality assurance across the EHEA is to ensure that all higher education institutions and quality assurance agencies are working in accordance with a set of commonly agreed principles and standards for their internal and external quality assurance activities: the [Standards and Guidelines for Quality Assurance in the EHEA \(ESG\)](#). First introduced in 2005 and updated in 2015, the ESG are designed to be applicable across the diverse range of higher education contexts in the EHEA, while still providing a core understanding and minimum practices to which all stakeholders can relate. As such they are necessarily fairly generic and are incorporated into more detailed regulation at national and local level, by governments, quality assurance agencies and higher education institutions. This approach is a factor in the success and widespread implementation of the ESG, but also means that there are still significant differences between national and regional quality assurance frameworks, which can be a barrier for internationalisation.

Beyond the ESG, other tools and political commitments have also been introduced to support internationalisation as part of the EHEA quality assurance framework: support for cross-border quality assurance through the principle of recognising the decisions of all EQAR-registered agencies (Bucharest Communiqué 2012, Yerevan Communiqué 2015), development of the European Approach for the Quality Assurance of Joint Programmes (Yerevan Communiqué 2015), and consistent implementation of quality standards for transnational higher education (Rome Communiqué 2020). However the implementation of these tools and policies has been patchy and slow. New impetus has come through the European Commission's initiative for the creation of European Universities alliances in 2019, which has put the need for seamless cross-border cooperation back in the spotlight, and the spillover effect can be seen throughout the EHEA. Nonetheless, significant challenges remain, not to mention new questions around the quality assurance of the alliances themselves. The European Commission seeks to address some of these issues through their recent proposals¹ for a European degree and a model for external quality assurance of joint education provision by Universities alliances, however these developments are at an early stage.

¹ <https://education.ec.europa.eu/news/commission-presents-a-blueprint-for-a-european-degree>

This paper will explore the state of implementation of the various quality assurance tools that support internationalisation, discuss how current quality assurance arrangements both support and inhibit international activities of higher education institutions, and reflect on how these challenges might be addressed, including through the upcoming revision of the ESG. As such, the paper provides input for further discussion, but not any concrete proposals for changes to the ESG.

The material for the paper draws on the results of recent surveys² to map activities and perceptions in the field of quality assurance across national authorities, quality assurance agencies, higher education institutions and students. The research was conducted as part of the [QA-FIT project](#) (Quality Assurance Fit for the Future³) and is supplemented by other information and data held by the contributing organisations. The paper focuses on internationalisation in the sense of cross-border activities of institutions and agencies within the EHEA, rather than other approaches, such as internationalisation at home, inclusion of foreign experts in internal and external quality assurance processes, and participation in international networks, projects and partnerships.

Purpose and value of a European framework for quality assurance to support internationalisation

Before addressing the individual aspects of policy and practice in relation to quality assurance and internationalisation, it is worth first noting the perceptions of stakeholders towards the very concept of a common quality assurance framework. The results of the QA-FIT surveys show that there is very strong consensus both within and between stakeholder groups as to the great value of such a framework and the important role that it plays.

Stakeholders view the European quality assurance framework as playing a key role in meeting the aims of the Bologna Process. The average responses across all stakeholder groups show that the following purposes are considered to be very or quite important: facilitating international cooperation between higher education institutions, facilitating international student mobility, facilitating degree recognition and increasing transparency and trust between (countries') higher education institutions (see Figure 1).

² The surveys were answered by 36 Ministries, 76 quality assurance agencies, 31 National Unions of Students, 260 Higher education institutions.

³ The project is coordinated by the European Association for Quality Assurance in Higher Education (ENQA). The other stakeholder partners of the project are the so-called E4 organisations (the authors of the 2005 ESG), i.e. the European University Association (EUA), the European Association of Institutions in Higher Education (EURASHE), and the European Students' Union (ESU). The project also includes the European Quality Assurance Register for Higher Education (EQAR) and a number of national organisations as partners: the Irish Universities Association (IUA), the Finnish Education Evaluation Centre (FINEEC), the National Alliance of Student Organisations in Romania (ANOSR), and the Ministry of Education and Science of Georgia (associated partner). The project aims to map the state of play and perspectives for the future of European quality assurance.



How important do you consider the following purposes of a European QA framework?

Source: QA FIT Survey • Created with Datawrapper

Figure 1. Importance of the purposes of a European quality assurance framework (percentage of all stakeholders choosing answer option 'very important' or 'quite important')

Considering the purposes of a European quality assurance framework, there is an overall consensus that support for internationalisation is regarded as 'very important' or 'quite important' by most stakeholders. They also attach considerable importance to the purposes 'facilitate cooperation between HE institutions' and 'facilitate international student mobility'. Quality assurance agencies furthermore particularly recognise the value of a common framework in supporting international cooperation between agencies, with 96% seeing this as a 'very important' or 'quite important' purpose.

Specifically with regards to the ESG, there is also a strong consensus that they play a crucial role in supporting various aspects of internationalisation and largely meet the purposes set out by the framework: supporting trust in higher education qualifications (average of 96% across the surveyed stakeholders agree or somewhat agree), support the recognition of qualifications (91%) and support the mobility of students (87%). While the level of agreement with these statements was fairly similar for national unions of students (between 88% and 94%), a higher percentage of 'somewhat' agreeing rather than 'agreeing' is present in comparison with other stakeholders. Rather than questioning the added value, this may be interpreted in correlation with other answers as a wish to expand the role of the ESG to explicitly support the purposes included in the statements. There were also 11% of national authorities that answered 'I don't know' regarding the ESG supporting mobility of students, which may reflect that this issue is dealt with more specifically at the level of higher education institutions.

One of the key principles of quality assurance in the EHEA is that institutions have primary responsibility for the quality and quality assurance of their education provision. However, that responsibility always falls within an external quality assurance framework set by the relevant quality assurance agency and governmental authority. A wide range of factors have an impact on the development of those frameworks.

Quality assurance agencies, higher education institutions and students all recognise that some topics linked to international aspects of higher education have an impact on the external quality assurance activities in their local context. These include increased internationalisation in higher education institutions, joint programmes, and transnational education. However, it should also be noted that

national laws and policies, and Bologna Process policies and tools in general (including the ESG) are ranked as having a higher impact on the external quality assurance framework than the above mentioned internationalisation factors by the surveyed stakeholder groups.

2. From policy to practice

In order to explore in more detail the link between internationalisation and quality assurance, the following sections of this chapter address different aspects of this topic. Some focus on how quality assurance deals with international activities of higher education institutions, such as the quality assurance of joint programmes and transnational education, whereas others are more closely linked to the international activities of quality assurance agencies themselves, such as cross-border quality assurance (while recognising that there is some overlap between these two categories particularly, e.g. in the case of quality assurance of joint programmes). The chapter seeks to give an up-to-date picture of the activities of higher education institutions and quality assurance agencies, highlight some of the ongoing challenges around translating policy commitments into practice, and reflect on stakeholder perspectives.

Cross-border quality assurance - Policy

The objective for EQAR-registered quality assurance agencies to be acknowledged across the entire EHEA, with higher education institutions having the freedom to select any (suitable) registered agency, was already set out in the London Ministerial Communiqué (2007). The Bucharest Ministerial Conference (May 2012) further emphasised the aim to promote cross-border recognition of EQAR-registered agencies' external quality assurance activities (while complying with national requirements), thereby enhancing the recognition of degrees and qualifications and avoiding duplication, particularly for the external quality assurance of joint degree programmes.

At the Yerevan Ministerial Conference (May 2015), EHEA ministers reaffirmed their commitment to enabling higher education institutions to assume responsibility for their quality assurance and to choose an appropriate EQAR-registered quality assurance agency for their mandatory external evaluation while 'respecting the national arrangements'.

Since 2012, EQAR has been monitoring whether EHEA countries have opened their legal framework to external quality assurance working in compliance with the ESG, and if higher education institutions can choose an EQAR-registered agency for their mandatory external quality assurance.

To date, only 64% of EHEA higher education systems have enacted legislative provisions to permit their higher education institutions to be accredited, evaluated, or audited by an EQAR-registered agency from abroad (see Figure 2). However, in some cases, this legal openness is counteracted by additional requirements and numerous practical challenges that limit the implementation of this option in reality.

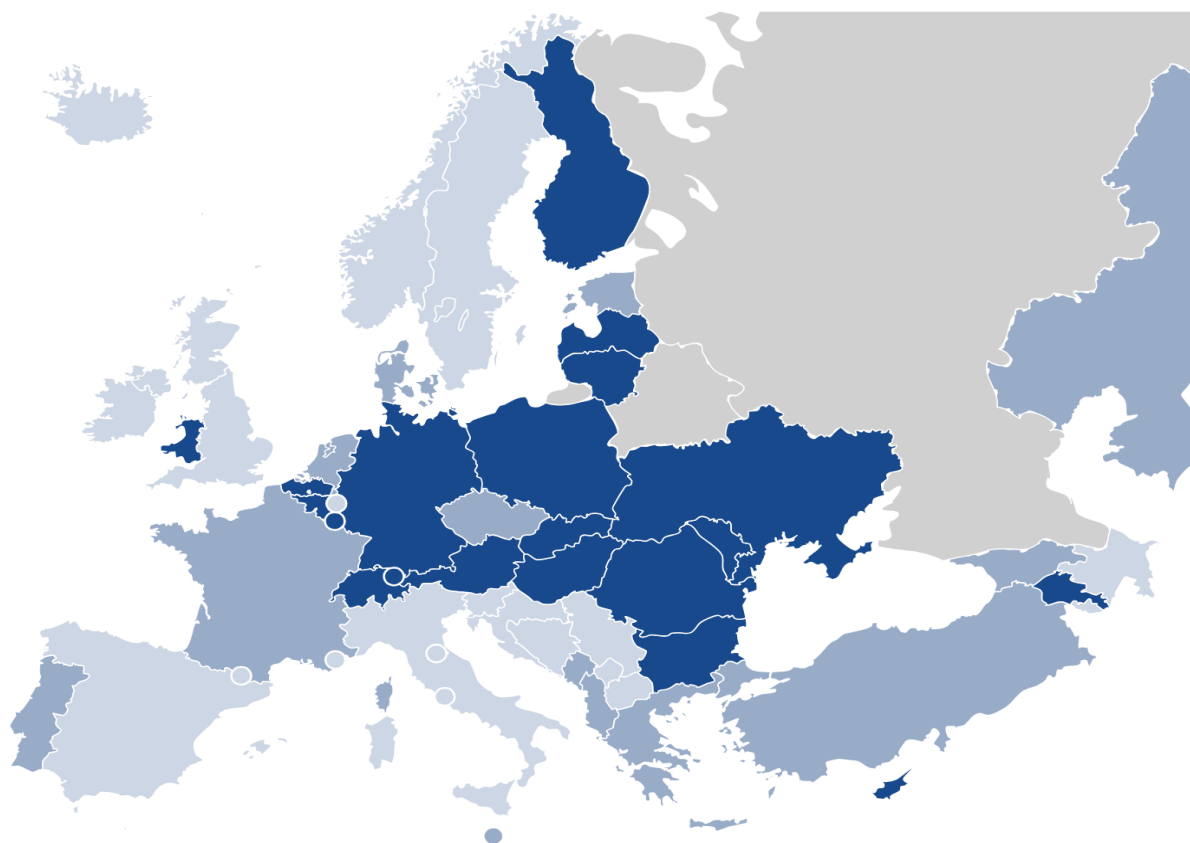


Figure 2. System openness to cross-border quality assurance (September 2023): all HEIs (dark blue) can use a suitable EQAR-registered agency, some HEIs can or only with additional conditions (medium blue), none of the HEIs can use it (light blue).

Cross-border quality assurance - Practice

In recent years, cross-border quality assurance accreditation and evaluation (i.e. by an agency from outside the institution's national jurisdiction) has gained traction as a tool to support higher education institutions' internationalisation efforts.

DEQAR data shows a steady rise in cross-border external quality assurance activity in Europe in the past 10 years (see Figure 3) including in the years of the pandemic. However, progress has been nevertheless slow in 'opening' the legal frameworks of national external quality assurance systems in EHEA and in recognising the reviews by EQAR-registered agencies.



Figure 3. Share of cross-border external quality assurance results in DEQAR by year (September 2023)

The majority of cross-border reviews recorded in DEQAR (90%) are carried out at programme level, while institutional level reviews and joint programme reviews represent a smaller share of these procedures (8% and 2% respectively).

Cross-border quality assurance activities represent a smaller share of activities carried out by national/regional agencies (overall 5-7% of all external quality assurance reviews are cross-border (see Figure 4). The QA-FIT survey shows that 45% of responding agencies conduct cross-border quality assurance in addition to reviews in the country where they are based. Almost a quarter of agencies noted that they can in theory operate in other countries, however this may be done only in specific circumstances, e.g. for branch campuses. Agencies also indicated in their responses that they would like to increase their international activities (this was one of the top five responses for desired future changes in their activities, however the specific nature of the international activity was not always explained). When asked about what stops the agency from making these changes, the most common responses were national law and policies, as well as time or human resources.

Share of cross-border external quality assurance results in DEQAR by year (EHEA institutions only)

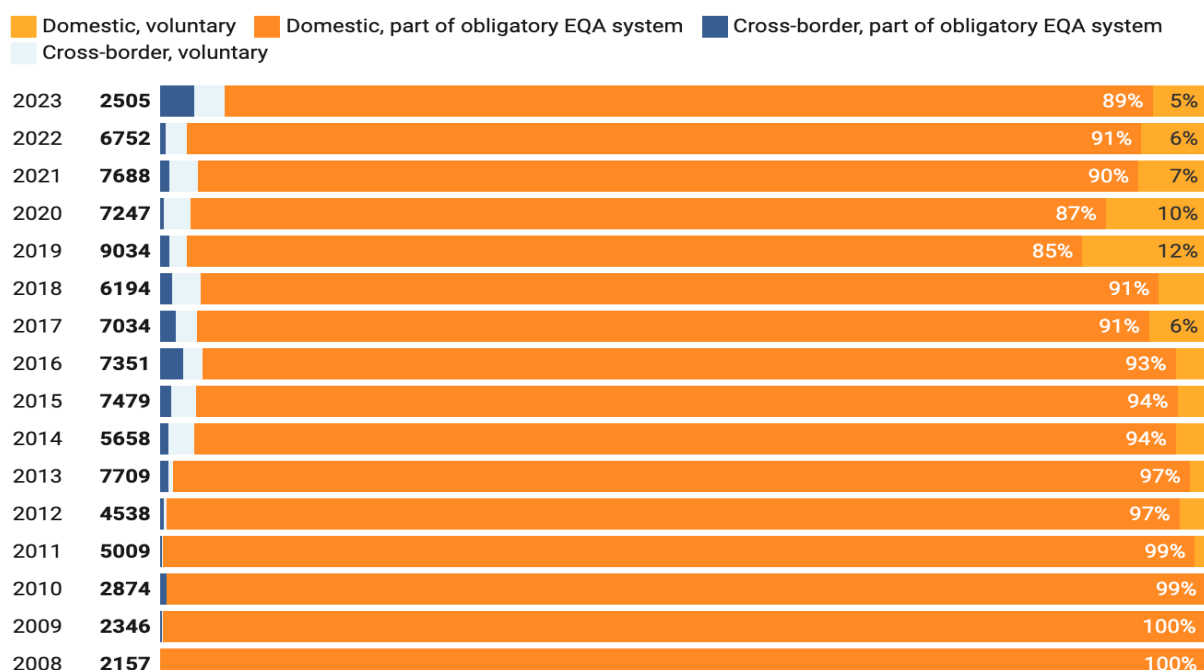


Figure 4. Share of cross-border vs home based external quality assurance results by year (DEQAR data, September 2023)

Cross-border quality assurance services are offered by quality assurance agencies for a range of reasons, including as part of their efforts to increase their profile and visibility, as an additional source of revenue, and to respond to the reality of a more internationalised higher education environment. However, it may be problematic to conduct reviews in countries with issues regarding freedom of speech, student involvement, and other fundamental values in higher education, due to limitations imposed on the work of the quality assurance agency as well as limitations on any form of critical recommendation they may put forward. Agencies are expected to exercise caution when being active in countries outside the EHEA particularly, where the practices related to upholding fundamental values are quite different. Furthermore, working across borders may place agencies in a competitive market, the consequences of which may not be fully clear at the outset.

Reviewed institutions often choose cross-border external evaluations in order to strengthen their internationalisation policies, to enhance their institution's profile, as well as to increase external acknowledgement of the institutions' efforts to improve. Of the 3838 higher education institutions included in DEQAR (September 2023), 18% had been externally reviewed (at least once) by an EQAR-registered quality assurance agency based outside the institution's home country. While a smaller percentage (11%) of higher education institutions indicated in the QA-FIT survey that their most recent external quality assurance review was carried out by an agency located in another country, these figures

nevertheless show a continuous interest in cross-border external quality assurance.

The use, benefits and costs of cross-border quality assurance reviews for institutions may vary from country to country, and also depend heavily on whether the review by a foreign quality assurance agency is done in place of that usually conducted by a national agency therefore carrying regulatory consequences, or whether it is an additional voluntary process for the higher education institution. This differentiation is also fundamental for quality assurance agencies and has implications for the motivations, type of activity and adaptations to processes or criteria.

DEQAR data shows that most cross-border quality assurance procedures (64% of a total of 3841 total cross-border external quality assurance activities up to September 2023) are carried out as voluntary or add-on activities, despite fulfilling the main condition of alignment with the ESG, while mandatory external quality assurance procedures represent 36% of such cross-border reviews carried out within EHEA.

Countries where cross-border quality assurance procedures are recognised as part of the regular external quality assurance framework naturally have a higher number of cross-border reviews i.e., in Kazakhstan 815 procedures, France 350 procedures, Germany 283 procedures, Austria 222 procedures, Moldova 157 procedures, Romania 158 procedures etc. (DEQAR data, September 2023⁴). With the exception of Moldova, all of the above countries have at least one agency registered in EQAR that also carries out reviews across borders. This shows an openness of the whole higher education system (legal framework, quality assurance agencies and higher education institutions) towards cross-border quality assurance. Such an openness can be conducive to cross-border quality assurance, and demonstrates a way of conceptualising the internationalisation of quality assurance within the EHEA framework. However, further discussion is needed on the implications for agencies and institutions of facilitating a competitive quality assurance market, as this aspect has been somewhat neglected in the push to allow agencies to work across borders.

Quality assurance agencies face varying additional requirements when operating in other countries. In many cases, these requirements can be in line with European commitments and good practice, such as ensuring cross-border quality assurance activity aligns with the national framework or informing the national quality assurance body of the cross-border accreditation. However, some countries impose more limiting constraints including multiple additional checks on meeting the eligibility requirements, detailed provisions on the use of national standards and criteria, as well as further post-recognition procedures for accepting the results of the cross-border quality assurance activity. All this

⁴View DEQAR data on cross-border quality assurance reports by country: https://www.eqar.eu/qa-results/search/by-report/?limit=20&ordering=-date_created&cross_border=true&offset=0

despite the principle of agencies having proven their legitimacy through successful EQAR registration.

The most common national legal requirements on cross-border quality assurance can be categorised into eligibility, work conditions, system level limitations, and specific stipulations for recognition.⁵ Eligibility may involve gaining approval from a competent national body and demonstrating expertise. Work conditions may include using national regulations, frameworks, and language, and adapting standards to meet national requirements. System level limitations might restrict the scope of such an exercise to specific institutions or programmes. Ultimately, the recognition of reviews may depend on approval (of the report and/or the decision) from a competent national body or quality assurance agency.

Results from the QA-FIT survey to ministries show that even where cross-border quality assurance is recognised, it is not necessarily a practice that is facilitated or encouraged. In some countries, higher education institutions can be evaluated by an EQAR-registered quality assurance agency at their own expense and the national accreditation body might take that into account, but it does not provide a guarantee of recognition or exemption from evaluation by a national agency. In some cases the choice of the quality assurance agency remains in the remit of the government, i.e., the Ministry of higher education and research is responsible for selecting a suitable EQAR-registered agency for the mandatory external quality assurance review.

In the QA-FIT survey to quality assurance agencies, 16% reported that their legal framework does not allow for them to conduct cross-border quality assurance, which highlights an issue not just with countries' openness to accepting quality assurance procedures by foreign agencies, but also with allowing their national or regional agencies to operate outside the national context.

While it is difficult to predict the extent of growth in cross-border quality assurance activity if legal obstacles are eliminated, it is certain that interested higher education institutions would be able to choose an external quality assurance review that they consider better aligned with their specific mission and goals.

For those that want to and are able to engage in this type of activity, the Key Considerations for Cross-Border Quality Assurance⁶ may provide a useful tool for higher education institutions planning to engage in cross-border quality assurance and quality assurance agencies initiating new procedures across borders.

⁵ See EQAR's Knowledge Base <https://www.eqar.eu/kb/country-information/>

⁶ <https://www.eqar.eu/kb/cross-border-ga/key-considerations/>

Joint programmes - Policy

The European Approach to Quality Assurance of Joint Programmes⁷ (generally referred to as the 'European Approach') aims to tackle the issue of diverse national criteria and varying accreditation processes in European higher education that cause specific challenges for joint programmes. These challenges include multiple administrative procedures, conflicting criteria, and disparate accreditation timelines, which can lead to uncertainty and conflicting decisions, complicating the planning and organisation of joint programmes.

The European Approach consists of two main components: a set of agreed standards, and an established procedure. The standards closely align with Part 1 of the ESG and incorporate agreed-upon EHEA tools, particularly the Qualifications Framework (QF-EHEA) and the European Credit Transfer and Accumulation System (ECTS). The underlying premise is to implement the European Approach directly, without the need for additional inclusion of any national criteria.

The agreed procedure can be utilised by any suitable EQAR-registered quality assurance agency whenever at least one consortium partner requires external programme accreditation. So far 11 of the 55 EQAR-registered quality assurance agencies have employed this procedure (as of September 2023). In cases where institutions do not require programme level external quality assurance, they can incorporate the agreed standards into their internal quality assurance arrangements.

⁷https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf

Joint programmes - Practice

While there is no systematic count available regarding the overall number of joint programmes across the EHEA, about 60% of higher education institutions responding to the QA-FIT survey (152 of 260) answered that their institutions offer such programmes (although this number does not equate to the number of joint programmes in existence as multiple institutions may be reporting the same programme). The Erasmus Mundus⁸ catalogue further shows that there are ±188 ongoing joint master programmes across 36 of the 49 EHEA member countries funded under that mechanism. Of the 39 currently known jointly designed study programmes reviewed using the European Approach, 19 are part of an Erasmus Mundus Master for Joint Programmes.

Does your country's legal framework allow for the evaluation of joint programmes based on the European Approach for Quality Assurance of Joint Programmes?

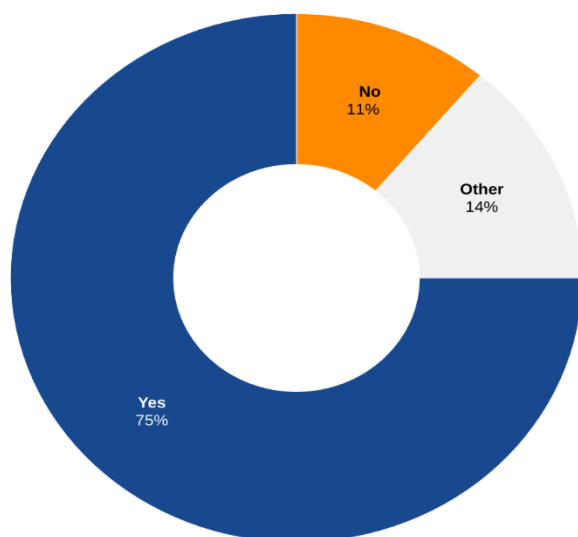


Chart: EQAR • Source: QA FIT Survey • Created with Datawrapper

Figure 5. Does the country's legal framework allow for the use of the EA for the quality assurance of Joint Programme? (QA-FIT Ministry Survey, January 2023)

Ministry responses to the QA-FIT survey (corroborated with EQAR's Knowledge Base⁹) show that, only 20 out of the 49 EHEA member countries have fully embraced the European Approach for all higher education institutions. This also includes a number of countries where quality assurance is primarily undertaken at institutional level (Armenia, Finland, UK Scotland, UK England, Wales and Northern Ireland and Switzerland) and therefore the use of the European Approach is neither required nor impeded by national legal frameworks. The data in DEQAR shows that the European Approach was used in higher education institutions based in 29 of the EHEA member countries and 6 other non-EU countries.

⁸ https://www.eacea.ec.europa.eu/scholarships/erasmus-mundus-catalogue_en

⁹ EQAR's Knowledge Base provides an live overview of all EHEA members countries legal framework and fulfilment of quality assurance commitments. Information is collected and updated from each member state <https://www.eqar.eu/kb/country-information/>

The DEQAR data indicates that higher education institutions most frequently utilise the European Approach in countries where the legal framework enables the adoption of the approach. For instance, in France 13 higher education institutions have had joint programmes reviewed with the European Approach, 12 higher education institutions in Germany, 11 higher education institutions in Spain and 6 in the Netherlands. All these countries have introduced a legal framework to allow the use of the European Approach for the external quality assurance of joint programmes.

The data further shows a preference for joint programme procedures carried out at the second cycle (36 of 39 procedures at second cycle) and a clear preference to choose a quality assurance agency from one of the countries involved in the programme consortium.

While the completed European Approach procedures are very few (39 procedures of a total number of 47 international joint programme reviews carried out by EQAR registered agencies between 2016 and 2023), according to DEQAR data there has been a higher share in recent years in the use the European Approach as opposed to other procedures (see Figure 6).

Year	No. of EA procedures	No. of <u>international</u> joint programme procedures (excluding EA)	No. of <u>national</u> joint programme procedures
2016	1	2	5
2017	2	6	5
2018	3	3	7
2019	6	13	10
2020	2	2	27
2021	6	9	16
2022	6	6	5
2023	13	6	6
Total	39	47	81

Figure 6. Uptake of the EA procedures vs. the employment of other international joint programme procedures, by year.

The limited increase in the number of procedures, as shown in Figure 6, could be attributed to factors such as lack of familiarity with the European Approach, practical challenges associated with conducting such procedures, and a limited understanding of various higher education systems. However, it should also be noted that as more systems move towards institutional level external quality assurance, the need to use the European Approach reduces. Therefore the total number of procedures conducted is not necessarily a direct indicator of system-level openness for its use.

Concerns raised by the IMPEA project's analytical report¹⁰, as well as reports from the Bologna Process Thematic Peer Group on Quality Assurance (2019) highlight several issues that complicate the use of the European Approach. These are related to differences in the duration of external quality assurance cycles, inconsistencies in qualifications across diverse higher education systems, language requirements for review reports and decisions to align with national administrative laws, the absence of clear and structured procedural guidelines, discrepancies in the definition of joint programmes in various systems (affecting eligibility for the European Approach), and variations in the overarching objectives of joint programme accreditation.

Since the adoption of the European Approach in 2015, at least 13 higher education systems that have a requirement for programme level accreditation (Austria, Belgium Flemish Community, Belgium French Community, Croatia, Estonia, France, Germany, Malta, Moldova, Poland, Romania, Slovenia, Spain) have amended their legislation to permit the use of the European Approach by some or all of their higher education institutions. Some of these countries have also introduced different conditions and requirements for the recognition of the EA procedure:

- In Estonia, the use of the European Approach is possible if the joint programme has previously undergone an assessment by an EQAR registered agency and the other higher education partners have the right to provide instruction in the corresponding study programme group and academic cycle. HAKA, the Estonian national quality assurance body, will assess whether the eligibility criteria are met and that no substantial shortcomings have been identified in the assessment report.
- In Georgia, the draft agreement of institutions implementing the joint programme has to be 'pre-approved' by the national quality assurance body, NCEQE, who will check the content and implementation of the joint programme, including whether the rules for awarding a joint academic degree and enrolment regulations are met.
- In Greece, joint programmes offered by Greek higher education institutions participating in a European University Alliance are expected to be reviewed following the European Approach, without any additional national criteria. Institutions that are not members of a European University Alliance are however required to undergo the regular programme accreditation for any joint programmes they may offer.

Quality assurance of Transnational Education (TNE) - Policy

Transnational education (TNE) or cross-border higher education (CBHE) involves learning activities where students are located in a different country from the institution providing the education. At the Bologna Process Ministerial Conference in Rome (2020), EHEA members pledged to apply equal quality

¹⁰Implementing the European Approach for Quality Assurance of Joint Programmes (IMPEA) http://impea.online/wp-content/uploads/2018/07/IO2_report_formated.pdf

assurance standards to TNE as those used for domestic provision. Employing the ESG in assessing TNE plays a vital role in ensuring quality and equality regardless of the location of the education delivery, legitimising the educational services provided by cross-border providers, validating the qualifications awarded, and protecting student interests.

National systems are expected to assure the quality of the exporting TNE while reducing the burden on the incoming cross-border providers if they have been accredited by an EQAR-registered agency. If the TNE courses lead to a recognised degree in the exporting country, the exporting institution should ensure its accreditation according to national standards. If aligned with the ESG, these standards should be easily recognised by the accreditation system of the host country.

On a global level, UNESCO-OECD Guidelines for Quality Provision in Cross-border Higher Education¹¹ were developed in 2005. However, these are not legally binding, and a recent study has shown that although the principles upon which the Guidelines are based are widely accepted, awareness of the Guidelines themselves was limited and there is a need for more concrete support and guidance.¹²

Quality assurance of Transnational Education (TNE) - Practice

Based on responses to the QA-FIT survey to ministries, 44% of higher education systems lack provisions in their legal framework to ensure that external quality assurance encompasses the TNE provision offered by their own country's higher education institutions (see Figure 7). Some respondents clarified that their country does not have higher education institutions abroad, or the TNE provision may be addressed through the regular institutional review by the quality assurance agency in their higher education system as opposed to a separate process for the TNE delivery.

¹¹ OECD and UNESCO. 2005. *Guidelines for Quality Provision in Cross-Border Higher Education*. Paris, UNESCO <https://web-archiv.oecd.org/2012-06-15/147238-35779480.pdf>

¹² Hopbach, A., 2022, UNESCO-OECD *Guidelines for Quality Provision in Cross-border Higher Education*. Analysis and recommendations to move forward. Paper commissioned for the World Higher Education Conference 18-20 May 2022. <https://cdn.eventscase.com/www.whec2022.org/uploads/users/699058/uploads/dfb17c1d1b810169318779e2ffb53bc77c2adcb05154cbfee6262cbdc3a393584e620c61b3db94d30aea4f74914e93815f.628335e0c6cd1.pdf>

Does your country's legal framework have provisions in place to ensure that external QA covers the transnational provision offered abroad by your country's HE institutions?

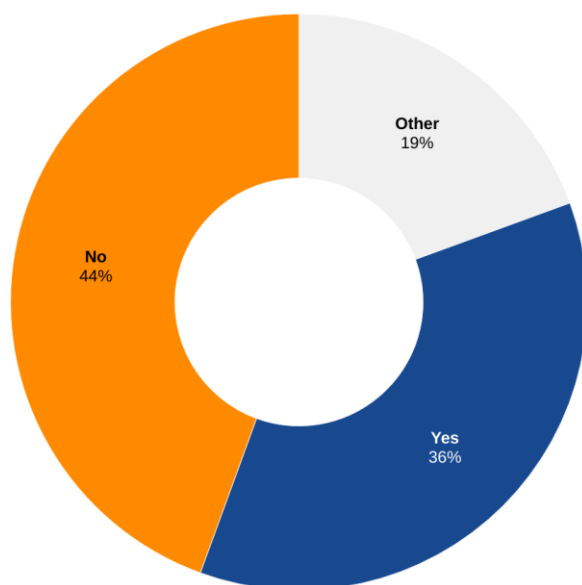


Chart: EQAR • Source: QA FIT Survey • Created with Datawrapper

Figure 7. Does the country's legal framework have provisions to cover the quality assurance of TNE offered abroad? (QA-FIT Ministry Survey, January 2023)

The respondents further revealed that in some of their countries higher education institutions are legally prohibited from providing TNE. Where such provision is allowed and recognised as part of the national higher education system, the external quality assurance approach is often different in comparison to the national provision.

Responses to the QA-FIT survey to agencies show that 42% of agencies cover TNE in their external quality assurance procedures, thus ensuring coverage of such provision that is based on the ESG. However, data further shows that 24% of them use different evaluation criteria for TNE than for home provision.

There are many push and pull factors for TNE. For receiving countries of TNE the benefit of an 'education export' is generally the import of knowledge, allowing students to gain knowledge, skills and qualifications without the social or financial burden of leaving their home country, and thus also helping to avoid brain-drain both during and after the period of study. For exporting (or 'sending') countries facilitating TNE may serve to support internationalisation policies but also different national educational objectives. For institutions specifically, it may serve to promote their international reputation and reach, as well as being a source of revenue. However, the combination of different motivations with unclear regulations for quality assurance risks creating a gap for un reputable actors.

National capacity for quality assurance and accreditation often falls short when it comes to overseeing TNE. Existing national quality assurance systems are designed to focus on domestic delivery by domestic institutions, and less so on the exception of TNE provision. This situation is further complicated by the

increasing and high diversity of the types of TNE (i.e., the provision may be offered as a result of franchising, the establishment of joint institutions or private independent universities, through foreign backed universities, subcontracted partner institutions) and forms of TNE (blended distance education, education provision with reduced frequency, online joint education), as well as a lack of a commonly agreed definition and approach in how to address such provision as part of the regular review of quality assurance agencies.

There are a number of challenges related to quality assurance of TNE. These largely relate to the broad definition and lack of data about the volume and location of this activity¹³. There is also a scarcity of information regarding how quality assurance of TNE is carried out in practice. This knowledge gap is a substantial concern, as it hinders a comprehensive understanding of the effectiveness and consistency of quality assurance measures across different TNE providers and host countries. There may be scope for further efforts in this regard, such as monitoring through the Bologna Process, or the expansion of EQAR's Knowledge Base of legal frameworks in the EHEA countries to also consider the quality assurance of TNE provision. Follow-up of initiatives such as ENQA's QACHE project¹⁴ could also support further development and sharing of good practice.

3. Quality assurance of European Universities alliances

The European Universities alliances is an European Union initiative, part of the European strategy for universities¹⁵. With the first call for proposals published in 2018, there are now 50 European Universities alliances involving more than 430 higher education institutions from all across Europe in 2023. The objective is to expand to 60 alliances with more than 500 higher education institutions by mid-2024.

As the Universities alliances develop various forms of joint education provision, questions related to quality assurance of this provision as well as of the alliances themselves have been discussed. The QA-FIT survey data show that there are some trends with a significant level of agreement across stakeholders but also a lot of uncertainty. The following section gives a brief overview of perspectives on this topic, as it is one of the most prominent recent initiatives related to internationalisation in higher education.

Regarding the quality assurance of alliances' provision of joint degree programmes, around half of all stakeholders (quality assurance agencies (51%), higher education institutions (45%), ministries (58%) and students (50%)) agree that the European Approach should be used to evaluate them. However, as Universities alliances are still developing their education provision and many do not yet offer joint programmes, it is somewhat early for stakeholders to give a

¹³ https://www.engq.eu/wp-content/uploads/Gover_Blackstock-TNE-paper.pdf

¹⁴ Quality Assurance of Cross-border Higher Education (QACHE project) <https://qache.wordpress.com/>

¹⁵ <https://education.ec.europa.eu/sites/default/files/2022-01/communication-european-strategy-for-universities-graphic-version.pdf>

concrete answer. Therefore, many (between 19% and 47%) selected 'I don't know' answer option. Furthermore, many respondents come from systems in which programme accreditation is not required and for which the European Approach would not be relevant, while a lack of concrete knowledge of the European Approach may also contribute to a relatively low perception of the need to use this tool.

Concerning the quality assurance of Universities alliances as education providers, the agencies, higher education institutions and students' answers show a general agreement that an evaluation at alliance level is needed in addition to the evaluation of individual alliance members and that one or the other is not sufficient and cannot replace each other. Importantly, the results show a significant amount of uncertainty around how to address this topic across all stakeholder groups. As mentioned above, this may be explained by the novelty of the initiative but also by the huge diversity of cooperation arrangements, which vary considerably in their breadth and depth, meaning that it may be very difficult to define the scope of external quality assurance procedures designed specifically for alliances. This concern was also identified by the EUniQ project¹⁶, which tested a framework for the external quality assurance of alliances.

Regardless of the external quality assurance approaches, there is agreement that Universities alliances should develop sound internal quality assurance systems thus applying the principle of higher education providers being responsible for the quality of their provision and its assurance.

Even though there is a degree of uncertainty regarding the quality assurance of alliances themselves and their joint provision, it is clear that the initiative has given impetus to and raised awareness of the use of the European Approach and openness of systems to cross-border quality assurance. Some systems have changed their national legislation as a result, while others are making exceptions for external quality assurance arrangements of education provision by alliances, which may eventually be extended across the sector. Further impetus is expected following the publication of the proposal for a European Union Council Recommendation on Quality Assurance and Recognition system¹⁷ in higher education, as this explicitly addresses the quality assurance of any form of institutional alliances and their joint education provision.

4. Conclusions

All stakeholders place high value on the EHEA framework for quality assurance as a tool to support internationalisation. However, despite the repeated political commitments at EHEA level, particularly on issues such as the use of the European Approach for Quality Assurance of Joint Programmes, and openness to

¹⁶ <https://www.nvao.net/en/euniqu>

¹⁷ <https://education.ec.europa.eu/document/proposal-for-a-council-recommendation-on-a-european-quality-assurance-and-recognition-system-in-higher-education>

cross-border quality assurance, implementation in practice is very slow. In many cases the main obstacle is considered to be the national legislative frameworks.

Additionally, it should be noted that quality assurance of transnational education, particularly when it involves provision outside the EHEA, is a major grey area that needs to be addressed.

Cross-border quality assurance and quality assurance of transnational education are two aspects that could be further addressed in the ESG. However, it is important to note that these activities are not relevant for all stakeholders, and are in many cases highly dependent on the national legislative framework. The concrete added value of cross-border quality assurance may also need further exploration, rather than focusing on this activity as an aim in itself. Furthermore, the expectations and boundaries of the ESG in its application to activities outside the EHEA may need further clarification.

Regarding the latest internationalisation development, the European Universities alliances, there are a range of perspectives and a lot of uncertainty regarding the best approach to external quality assurance, notably because alliances vary considerably in their cooperation models. Future discussions on this topic within the EHEA quality assurance framework will have to take place in parallel with the developments at EU level. The recent proposal for European Council Recommendation on Quality Assurance and Recognition also addresses this topic and actions at the level of the EU are likely to have a spillover effect in the wider EHEA, particularly as EU funding instruments to support implementation are likely to be opened more broadly, as has recently been the case for funding for the alliances themselves.

As mentioned above, there are a number of key topics and questions that require further discussion. A fundamental question related to the ESG is whether there is scope for it to make stronger reference to and/or provide stronger guidance on quality assurance of international activities of higher education institutions and agencies and how could that be done in a way that remains sensitive to the relevance and applicability in different contexts.

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The QA-FIT project aims to map the state of play of quality assurance in the EHEA and to critically evaluate the fitness for purpose of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

More information: <https://www.enqa.eu/projects/quality-assurance-fit-for-the-future-qa-fit/>



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