QUALITY PROCEDURES IN THE EUROPEAN HIGHER EDUCATION AREA AND BEYOND - INTERNATIONALISATION OF QUALITY ASSURANCE AGENCIES

4th ENQA Survey

JOSEP GRIFOLL, Achim Hopbach, Anthony Mcclaran, Paula Ranne, Teresa Sánchez Chaparro, Aurelija Valeikiéné
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FOREWORD

The development of the European Higher Education Area (EHEA) has greatly impacted quality assurance (QA) in higher education, resulting in the realisation of a solid network of QA agencies complying with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). In addition to taking care of their domestic responsibilities, many agencies have become active in international collaboration, for instance, by overseeing the provision of cross-border higher education, by providing quality assurance procedures as a service, and by engaging more actively in international networks.

Thus, in line with a maturing EHEA and as a follow-up activity to three previous surveys on external quality procedures, the European Association for Quality Assurance in Higher Education (ENQA) has conducted a fourth survey which specifically looks at the internationalisation of external quality assurance. The report presents a collection of current features of practice in international activities in external quality assurance. It reflects the priorities formulated by ENQA and ministers of higher education who adopted the Yerevan Communiqué (2015), and the ESG 2015, both of which emphasise mobility and internationalisation.

In addition, the present report identifies international activities that are supported by governments and maps the areas of potential risk, as well as benefits, in the internationalisation of external quality assurance. The report poses a question as to whether an international market of quality assurance services is emerging, and if so, how it should be developed.

It is my hope that this report provides the ENQA membership and stakeholders with a clear picture of what is meant by “internationalisation” in quality assurance, and will thus help colleagues in better understanding the challenges and opportunities they are presented when engaging in international collaboration and procedures.

Dr. Padraig Walsh
President
ENQA
EXECUTIVE SUMMARY

The third ENQA survey “Quality procedures: visions for the future”, conducted in 2012, took stock of the developments of quality assurance in the EHEA and revealed that variety and dynamism remain its distinct features. The survey gave some indication as to priorities for the future development of quality assurance. The main priority was considered to be the relationship between external quality assurance procedures and the development of mechanisms to enhance higher education. Complementary to the strategies focusing on enhancement, QA agencies considered that progress needs to be made regarding the international recognition of evaluation practices being implemented at the national level. This observation supported the idea of conducting the fourth quality procedures project specifically on the theme of internationalisation, initiated in 2014.

The most common activities in the internationalisation of quality assurance in which agencies are currently engaged include agency participation in international networks and cooperation with international partners, as well as inclusion of foreign experts in review panels. In addition, there appears to be a whole spectrum of international quality assurance procedures being carried out, including the quality assurance of programmes, institutional reviews, quality audits, internal quality assurance of higher education institutions, and consultancy. The focus of these procedures is evenly distributed between programme and institutional levels of higher education. Overall, the diversity of activities undertaken by agencies suggests that there is not yet a single, shared definition or profile for the internationalisation of quality assurance.

It can be concluded that while exporting quality assurance services is an aspiration for many governments, it is not yet a common form of internationalisation of quality assurance, nor a strong focus, for many QA agencies.

When formulating policies for internationalisation at the agency level, it most importantly concerns the design of review procedures with an international dimension by applying international standards, using foreign experts in panels, and collaborating with partners in international networks. Agencies have a variety of means to realise their plans for internationalisation: mission statements, annual plans, internal directives, and strategic plans. The responsibility to design policies for internationalisation lies largely with the agencies themselves.

Expectations from stakeholders, mainly from higher education institutions, towards the internationalisation of agencies are not described very concretely. The survey reveals that higher education institutions expect agencies to engage in international activities to some extent, but a common, clear view cannot yet be seen.

As regards the human and financial resources devoted to internationalisation, three primary sources of funding are mentioned: the regular budget, fees covered directly by higher education institutions in exchange for quality assurance services, and funds coming from
international sources, such as international projects and funds provided by embassies or international organisations. Agencies use their regular budgets to ensure a presence in international networks, to conduct benchmarking or training, and to include international experts in their quality assurance activities, i.e. internationalisation “at home”. Meanwhile, internationalisation “abroad”, such as specific projects and international assessment and accreditation activities, tends to be self-funded.

As regards the internationalisation of staff, exchanging staff with other QA agencies is not a common practice. At the same time, most agencies state that they always (or frequently) involve international experts in their quality assurance activities. The number of employees involved in international issues, as well as the number of international staff, has either increased or remained stable in recent years.

The core of the methodology of external quality assurance is the ESG, and often agencies apply a similar methodology abroad. Agencies underline the necessity for panels to be international when operating across borders, and a distinction between procedures at home and abroad is that cross-border quality assurance is more often focused on enhancement rather than the fulfilment of a regulatory need. Agencies aim to function in a flexible and responsive manner when working across borders in order to create an added value for institutions.

As regards the agencies’ relation to rankings, national or international, the majority have no specific policy to address them. Regarding national rankings, only one surveyed agency is involved in their production. It is anticipated, though, that the relationship between QA agencies and other bodies producing national rankings might become stronger in the future. As regards international rankings, agencies are rather sceptical that their work would be used for the production of ranking data.

The data shows a significant number of agencies rank international recognition among the most important benefits of conducting reviews abroad, while national recognition is considered less important in terms of benefits, although still rather important. Furthermore, many agencies rank the expansion of their experience as an important benefit of conducting reviews abroad.

The most significant limitation when developing international activities seems to be the lack of financial resources. In addition, the limitation of the number of experts and staff trained for international quality assurance services is considered a hindrance. Agencies also consider that jurisdictional limitations related to functioning outside their territory can cause constraints.

The survey shows that a significant number of international quality assurance services that are requested by higher education institutions are not brought to the immediate or direct attention of their national agencies. As a matter of fact, it is usually the institutions who are most active when initiating the import of quality assurance.

Concerning the quality of foreign quality assurance services, there is a significant number of agencies that view imported external reviews in a positive manner. Interestingly, agencies
consider there is often better recognition of quality assurance outcomes in cases of imported quality assurance services.

When reflecting upon the possibility of foreign agencies operating within agencies’ own national jurisdictions, views are somewhat ambivalent. Also, there are situations in which national QA agencies maintain certain privileges when competing with foreign agencies, which may lead to an uneven positioning between the two.

CHAPTER 1:
INTRODUCTION

1.1 PURPOSE OF THE PROJECT
Since the beginning of the Bologna Process, European ministers of education have called for a European dimension of quality assurance (QA) in higher education. At the second Bologna ministerial conference in Prague 2001, they put the collaboration of QA agencies on the agenda in order to develop a common frame of reference. In retrospect, the beginning stage of the Bologna Process - during which the development of common standards and guidelines (and the subsequent adoption of the Standards and Guidelines for Quality Assurance in the European Higher Education Area\(^1\) (ESG) at the 2005 Bergen ministerial conference) took place - marked a turning point in terms of applying European standards in quality assurance rather than distinctly national standards. Today it is known that these shared values and principles have developed as the major feature of the European dimension of quality assurance in the European Higher Education Area (EHEA). Implementing the ESG meant - and still means - applying an international mentality to all approaches of quality assurance and to all procedures no matter where they might be conducted.

Two years later, in 2007, the ministers advanced their aims by pledging support to cross-border activities of QA agencies. The European Quality Assurance Register (EQAR), founded in 2007, can be considered as the institutional component of an incorporated quality assurance market in the EHEA, as it opens up the national higher education systems to competing QA agencies. This commitment from the ministers, which was reconfirmed at the Bucharest ministerial meeting in 2012, revealed that the European dimension - or in general, the internationalisation of quality assurance - was no longer restricted to a set of principles and standards; rather, it put the actors into focus, thereby encouraging QA agencies to perform their activities in countries outside their original jurisdictions. This also meant possible competition against foreign agencies at home.

The main objective of this project is to document and analyse the current methodological state of the art and strategies in terms of internationalisation of external quality assurance in the EHEA and in terms of quality assurance as a contributor to the internationalisation of higher education. It aims to provide information regarding internationalisation policies existing at the national level as well as strategies and tools implemented by QA agencies across the EHEA.

Furthermore, the aim is to learn from the various agencies’ approaches to internationalisation (methodology) and identify shared practices and cooperation efforts between national QA agencies. The survey also gathers opinions from QA agencies about crossing borders, about the balance between incoming and outgoing quality assurance, and about resources used for international quality assurance and quality assurance for the internationalisation of higher education.

1.2 PREVIOUS QUALITY PROCEDURES PROJECTS

In the Prague Communiqué of 19 May 2001, the ministers of the Bologna Process signatory countries invited ENQA, together with the European University Association (EUA), the National Unions of Students in Europe (ESIB, currently the European Students’ Union [ESU]), and the European Commission to collaborate in establishing a common framework of reference and in disseminating good practices in the field of quality assurance in higher education.

As a response to this mandate, a first comprehensive ENQA survey on quality procedures in European higher education was carried out by the Danish Evaluation Institute (EVA) in 2002. The evaluation methods used in Europe were detailed in a publication entitled *Quality Procedures in European Higher Education - an ENQA Survey*. The report concluded that major progress towards convergence had been made in the basic methods and procedures among national QA agencies, even if they did not share the same priorities.

In 2007, ENQA conducted a thorough update exercise of the 2002 findings by collecting and analysing information on external quality procedures of ENQA’s members, associates, and affiliates. European quality assurance had developed significantly since 2002, having been increasingly influenced by the Bologna Process and by the adoption of the ESG in 2005. The results of the second ENQA survey were presented in the publication *Quality Procedures in the EHEA and Beyond - Second ENQA Survey*.

In 2010, the ministers of education participating in the Bologna Process officially launched the European Higher Education Area (EHEA). Two years after the completion of the second quality procedures project, ENQA mapped the changes that were taking place in the field of quality assurance due to the establishment of the EHEA, an area in which new social demands and expectations for higher education were being established. The third quality procedures project collected features of good practice concerning the new priorities formulated by ENQA and following the Leuven/Louvain-la Neuve and Budapest/Vienna ministerial communiqués, with an aim to explore practices that were expected to be implemented by QA agencies in the near future. The report, *Quality Procedures in the European Higher Education Area and beyond – Visions for the future*, was presented at the meeting of the European ministers responsible for higher education in Bucharest in April 2012.

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The fourth ENQA quality procedures project was launched in 2013. This project has been a follow-up activity to the three previous surveys on quality procedures. The findings present the types of international activities in which QA agencies are engaged or in which they are planning to engage. It presents the priorities national governments have in terms of internationalisation and how priorities are translated into action plans at the agency level. The findings map the risks and benefits of internationalisation, as seen by QA agencies. The report contributes to the discussion concerning whether an international quality assurance market is emerging and what obstacles and possibilities it may pose.

1.3 ORGANISATION OF THE PROJECT

A project group was established to conduct the survey and to draft the report, while the ENQA Secretariat managed the technical and administrative aspects of the project and was responsible for the production and publication of the report. The project group was composed of experts representing five QA agencies that are also members of ENQA. A fair regional distribution was borne in mind when forming the group.

- Josep Grifoll, AQU Catalunya (Spain), chair of the project
- Achim Hopbach, AQ Austria
- Anthony McClaran, QAA (United Kingdom)
- Teresa Sánchez, CTI (France)
- Aurelija Valeikienė, SKVC (Lithuania)
- Paula Ranne, ENQA Secretariat, secretary

The project was divided into four phases. The first task undertaken by the project group was to design and develop the survey. It was organised into seven sections:

1. Current mandate for internationalisation of QA agencies
2. Methodology for internationalisation assessment
3. Resources allocated to internationalisation
4. Types of internationalisation of quality assurance:
   a) Internationalisation at home
   b) Internationalisation abroad
5. Expectations on internationalisation of quality assurance
6. Risks and benefits of internationalisation of quality assurance abroad
7. Importing quality assurance services

The second phase comprised the distribution of the survey. The questionnaire was administered through Survey Monkey, an online survey tool. The link to the questionnaire was circulated to ENQA full member agencies (hereafter referred to as “members”) and to those ENQA affiliates that are QA agencies by e-mail in June 2014.

The respondents were not required to complete the survey in one sitting; the survey allowed several visits with access to the individualised survey link, and respondents could return to previous pages of the survey and update existing responses until the survey was completed. In the beginning of the survey, in order to avoid ambiguous interpretations, the following explanatory note was given:
Explanatory Note

In the context of this survey, “internationalisation at home”, “internationalisation abroad” and “international stakeholders” are meant as:

**Internationalisation at home:** internationally related QA procedures/activities undertaken by the agency within its own jurisdiction (e.g. use of international review panel members, international reference frameworks/standards in national assessments, cooperating with foreign QA agencies for national assessments, etc.)

**Internationalisation abroad:** internationally related QA procedures/activities undertaken by the agency outside its own jurisdiction (e.g. evaluations conducted abroad [either jointly or individually], coordination of European projects, cooperation with foreign QA agencies, mobility of staff, etc.)

**International stakeholder:** an international stakeholder who is a “regular” stakeholder based in another country

The closing date of the survey was originally 15 June 2014. After that, a preliminary analysis was prepared, and the project group held a meeting in September 2014 to discuss the initial results. At that meeting, it was decided that the survey would be opened again to attract more responses. Thus the survey was reopened in September 2014 and finally closed again in October 2014.

The third phase of the project consisted of the analysis of the responses. The analysis was divided among the project group members who were tasked with analysing one or two of the above-mentioned seven sections.

The fourth phase resulted in the production and release of this report.

**1.4 BACKGROUND INFORMATION ABOUT RESPONDENTS**

In total, 47 questionnaires – from 35 members and 12 affiliates - were submitted by agencies from 27 countries.

In cases where individual responses were not received from all respondents, the total may be less than 47. For some questions, respondents had the opportunity to select as many choices as they wished, so in these cases, the total may be more than 47.

Respondents were encouraged to disclose their identity so that their answers could be sufficiently attributed when used as an example or emphasised as good practice, but they had the option to remain anonymous in the final report. Seven respondents out of 47 favoured anonymity. The name and the country of these organisations are therefore omitted in the reporting.

As shown in Tables 1 and 2, a total of 47 organisations responded to the survey. The respondents were classified according to their relation to ENQA at the time of their response, i.e. member or affiliate (affiliates that are QA agencies).
MEMBERS

<table>
<thead>
<tr>
<th>NAME OF AGENCY</th>
<th>COUNTRY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Agency for Evaluation and Accreditation of Higher Education (A3ES)</td>
<td>Portugal</td>
</tr>
<tr>
<td>2 Accreditation Commission Czech Republic (ACCR)</td>
<td>Czech Republic</td>
</tr>
<tr>
<td>3 Accreditation Organisation of The Netherlands and Flanders (NVAO)</td>
<td>Netherlands/Belgium</td>
</tr>
<tr>
<td>4 Quality Assurance Agency for the University System in Castilla y León (ACSUCYL)</td>
<td>Spain</td>
</tr>
<tr>
<td>5 Evaluation Agency for Research and Higher Education (AERES)5</td>
<td>France</td>
</tr>
<tr>
<td>6 Andalusian Agency of Knowledge, Department of Evaluation and Accreditation (AAC-DEVA)</td>
<td>Spain</td>
</tr>
<tr>
<td>7 National Agency for Quality Assessment and Accreditation of Spain (ANECA)</td>
<td>Spain</td>
</tr>
<tr>
<td>8 Agency for Quality Assurance in the Galician University System (ACSUG)</td>
<td>Spain</td>
</tr>
<tr>
<td>9 Agency for Science and Higher Education (ASHE)</td>
<td>Croatia</td>
</tr>
<tr>
<td>10 Agency for Quality Assurance and Accreditation Austria (AQ Austria)</td>
<td>Austria</td>
</tr>
<tr>
<td>11 Catalan University Quality Assurance Agency (AQU Catalunya)</td>
<td>Spain</td>
</tr>
<tr>
<td>12 Agency for the Evaluation and Promotion of Quality in Ecclesiastical Faculties (AVEPRO)</td>
<td>Holy See</td>
</tr>
<tr>
<td>13 Bulgarian National Evaluation and Accreditation Agency (NEAA)</td>
<td>Bulgaria</td>
</tr>
<tr>
<td>14 Centre for Quality Assessment in Higher Education (SKVC)</td>
<td>Lithuania</td>
</tr>
<tr>
<td>15 Commission des Titres d’Ingénieurs (CTI)</td>
<td>France</td>
</tr>
<tr>
<td>16 Commission for Accreditation and Quality Assurance (CAQA)</td>
<td>Serbia</td>
</tr>
<tr>
<td>17 Danish Evaluation Institute (EVA)</td>
<td>Denmark</td>
</tr>
<tr>
<td>18 Estonian Higher Education Quality Agency (EKKA)</td>
<td>Estonia</td>
</tr>
<tr>
<td>19 European Council on Chiropractic Education (ECCE)</td>
<td>European</td>
</tr>
<tr>
<td>20 Evaluation Agency of Baden-Wuerttemberg (EVALAG)</td>
<td>Germany</td>
</tr>
<tr>
<td>21 Finnish Education Evaluation Centre (FINEEC, formerly FINHEEC)</td>
<td>Finland</td>
</tr>
<tr>
<td>22 German Accreditation Council (GAC)</td>
<td>Germany</td>
</tr>
<tr>
<td>23 Hungarian Accreditation Committee (HAC)</td>
<td>Hungary</td>
</tr>
<tr>
<td>24 National Accreditation Agency (NAA)</td>
<td>Russia</td>
</tr>
<tr>
<td>25 Norwegian Agency for Quality Assurance in Education (NOKUT)</td>
<td>Norway</td>
</tr>
<tr>
<td>26 Polish Accreditation Committee (PKA)</td>
<td>Poland</td>
</tr>
<tr>
<td>27 Quality and Qualifications Ireland (QQI)</td>
<td>Ireland</td>
</tr>
<tr>
<td>28 Romanian Agency for Quality Assurance in Higher Education (ARACIS)</td>
<td>Romania</td>
</tr>
<tr>
<td>29 Swedish Higher Education Authority (UKA)</td>
<td>Sweden</td>
</tr>
<tr>
<td>30 Swiss Center of Accreditation and Quality Assurance in Higher Education (OAQ)6</td>
<td>Switzerland</td>
</tr>
<tr>
<td>31 Anonymous (this agency chose to remain anonymous in the final report)</td>
<td></td>
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<td>32 Anonymous (this agency chose to remain anonymous in the final report)</td>
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<td>33 Anonymous (this agency chose to remain anonymous in the final report)</td>
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<td>34 Anonymous (this agency chose to remain anonymous in the final report)</td>
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<tr>
<td>35 Anonymous (this agency chose to remain anonymous in the final report)</td>
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</table>

Table 1. Members that participated in the survey

5 AERES was replaced by HCERES (High Council for the Evaluation of Research and Higher Education) in November 2014.
6 OAQ was replaced by AAQ (Swiss Agency of Accreditation and Quality Assurance) in January 2015.
AFFILIATES

<table>
<thead>
<tr>
<th>NAME OF AGENCY</th>
<th>COUNTRY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Accreditation Commission of the Slovak Republic (ACSR)</td>
<td>Slovakia</td>
</tr>
<tr>
<td>2. Agency for Development of Higher Education and Quality Assurance (HEA)</td>
<td>Bosnia and Herzegovina</td>
</tr>
<tr>
<td>3. Hellenic Quality Assurance Agency (HQA)</td>
<td>Greece</td>
</tr>
<tr>
<td>5. Independent Agency for Accreditation and Rating (IAAR)</td>
<td>Kazakhstan</td>
</tr>
<tr>
<td>6. National Center for Educational Quality Enhancement (NCEQE)</td>
<td>Georgia</td>
</tr>
<tr>
<td>7. National Centre for Professional Education Quality Assurance Foundation (ANOQA)</td>
<td>Armenia</td>
</tr>
<tr>
<td>8. National Centre for Public Accreditation (NCPA)</td>
<td>Russia</td>
</tr>
<tr>
<td>9. Anonymous (this agency chose to remain anonymous in the final report)</td>
<td></td>
</tr>
<tr>
<td>10. Anonymous (this agency chose to remain anonymous in the final report)</td>
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</tr>
<tr>
<td>11. Anonymous (this agency chose to remain anonymous in the final report)</td>
<td></td>
</tr>
<tr>
<td>12. Anonymous (this agency did not disclose their name)</td>
<td></td>
</tr>
</tbody>
</table>

Table 2. Affiliates that participated in the survey

A majority of members answered the questionnaire (35 out of 44), followed by 12 affiliates (12 out of 27).

1.5 STRUCTURE OF THE REPORT

Chapter two of this report presents the different types of internationalisation activities in which QA agencies are engaged. It also addresses the core elements of agencies’ policies for internationalisation. This chapter sheds more light on both the internationalisation policy agreed upon at the European level by ministers and policies at national level by analysing the mandates of QA agencies as regards their international profiles and, in particular, their international activities. This is an interesting endeavour, because the general “implementation dilemma” of Bologna reform activities applies also to quality assurance. When the European agenda is translated at the national level, existing national agendas play a vital role to the extent to which and how the “Bologna tools” or reforms are implemented in a given country, such as in the adoption of national regulations, policies, and structures according to the agreed Bologna requirements. The chapter thus analyses the way in which the mandates of QA agencies mirror this situation. In this respect, the analysis takes into account a broad definition of the term “internationalisation”, covering internationalisation “at home” - in which agencies apply international standards to their domestic activities and procedures - as well as internationalisation “abroad” - in which agencies engage in international activities or work in foreign countries, whether in collaboration with other agencies and stakeholders or independently performing quality assurance activities outside their original jurisdiction.

The approach used to analyse the agencies’ mandates is particularly revealing, since the agencies were asked to provide their impressions of governments’ perspectives and views. It, therefore, ought to be borne in mind that responses may include misconceptions, as agencies are asked to interpret views not their own. Chapter two also describes the expectations that stakeholders, especially higher education institutions, have concerning the internationalisation of quality assurance. In this chapter it becomes clear that the concept of “internationalisation of quality assurance” remains vague, as expectations from institutions are not very concretely described.

Chapter three discusses the human and financial resources that are allocated to internationalisation. In this chapter, it can be learned how well the agencies are resourced to perform international activities. It also sheds light on the use of international experts in agencies, as well as on their international staff.

Chapter four puts the methodologies for international assessment in focus. It can be learned how often the “regular” methodologies are in use when operating abroad and how flexibly methodologies are applied compared to procedures in a national context. In this chapter, it is also clarified what QA agencies’ relation to rankings is by looking at the question of whether agencies assume their work is used for composing national or international rankings.

In chapter five, different benefits and risks of internationalisation are discussed. This chapter aims to describe some of the future challenges and possibilities of agencies’ international activities as viewed by agencies themselves. Finally, this chapter presents the views the agencies have about the import of quality assurance services and on foreign QA agencies operating in their own national jurisdictions.
CHAPTER 2:
INTERNATIONALISATION IN QUALITY ASSURANCE

Internationalisation is not only a part of the strategy for the future but already a reality for many agencies, as most of the responding members indicated that they carry out international activities, 26 agencies in total. There is a large spectrum of the type of work that is carried out abroad – quality assurance of programmes, institutional reviews, quality audits, internal quality assurance of higher education institutions, and consultancy. About one-third of the agencies express that their activities are geared towards both the study programme level (15 agencies) and the institutional level (13 agencies).

Only one agency stated they are involved not only in regular accreditation activities, but also in consultancy activities abroad.

Only four member agencies (in Portugal, the United Kingdom, Lithuania, and Czech Republic) acknowledged that in addition to their domestic obligations, they also bear responsibilities for assuring the quality of their home providers abroad. This appears to be a surprisingly low number considering the expectations laid out in the Revised Code of Good Practice in the Provision of Transnational Education.9 According to the Code,

academic quality and standards of transnational education programmes should be comparable to those of the parent awarding institution(s), if any, and respect the criteria and provision for quality assurance and/or accreditation systems of the home country as well as be recognized in an appropriate way by the receiving country whether as legitimate foreign education or part of the host education system.10

The above-mentioned Code does not directly determine duties for QA agencies, but instead underscores that “awarding institutions as well as the providing institutions are accountable and fully responsible for quality assurance and control”.

Only four member agencies indicated that they have not conducted any cross-border activities at the time of the survey. In contrast, the German Accreditation Council (GAC) clearly stands out, as its core mandate is just the opposite: compared to other national or subject-specific agencies, it is the unique task of GAC to provide a framework to perform cross-border activities for foreign bodies within the German accreditation system.

Of the 12 affiliates that responded to the survey, only one – the National Centre for Public Accreditation (NCPA, Russia) – is performing programme accreditation as its only type of cross-border activity. Another agency (Accreditation Commission of the Slovak Republic, ACSR) has intentions to start programme and institutional level activities in the near future.

10 Ibid.
The remaining affiliates do not take part in cross-border operations, and some of them regard this involvement as not being applicable to their situation at all.

It could be concluded that there is a whole spectrum of cross-border activities (quality assurance of programmes, institutional reviews, quality audits, internal quality assurance of higher education institutions, and consultancy), but the focus is rather evenly distributed between programme and institutional levels. It is also interesting to note that existing governmental support for the development of outbound transnational education, including through quality assurance, was mentioned only four times.

Given the current stage of development of external quality assurance in the EHEA, it could be further debated whether it is appropriate to require a more active role for national QA agencies to assure quality provision of imported and exported education, as the transnational education Code appeals only to higher education institutions.

2.1 THE GOVERNMENTS’ POSITION TOWARDS INTERNATIONALISATION
The vast majority of EHEA countries have introduced national policies for QA agencies and quality assurance itself, most of which are formalised by legislative acts. Hence, governments play an important role in the design of national systems, the establishment of agencies, and, in particular, the definition of agencies’ remits and mandates. Given the emphasis on the internationalisation of quality assurance in the various declarations from the Bologna Process ministerial conferences, one would expect a high level of commitment to the subject, to be demonstrated by inclusion among national priorities.

To understand the main types of internationalisation in which the responding agencies are primarily engaged, or are required to engage by their governments or sectors, it was deemed helpful to focus primarily on the following survey questions:

- What is the position of your government concerning the internationalisation of quality assurance?
- What are the core elements of this policy (for the internationalisation of the QA agency)?
- Which of the following activities is the agency encouraged to perform (with specific national policies) on the internationalisation of quality assurance?

The type of internationalisation most frequently mentioned by members and affiliates in response to the first question (an open question on the government’s position towards the internationalisation of quality assurance) was the international provision of quality assurance services. More specifically, allowing or encouraging national institutions to be quality assured/accredited by foreign agencies (inbound quality assurance) was mentioned by nine members and four affiliates (two respondents made specific reference to EQAR’s member agencies). Allowing or encouraging national agencies to carry out quality assurance services in other countries (outbound quality assurance) was mentioned by seven members (two respondents explicitly referred to encouragement or support to become an EQAR-listed agency).
The inclusion of international experts in review panels was the second most popular response, with six members in agreement. This was followed by compliance with the ESG (or more generally with international standards), as indicated by four member and two affiliate respondents.

The above answers seem to be consistent with those given in response to the third question, where agencies were asked to indicate which activities they were encouraged to perform through national policies. A clearer picture of the priorities of governments emerges here, with the most-selected options being:

1. To be listed in EQAR (selected by 17 members and 12 affiliates)
2. To use international peers in review panels (selected by 16 members and 12 affiliates)
3. To be actively present in international networks (other than ENQA) (selected by 12 members and 12 affiliates)

It is also interesting to note that, whilst “To be listed in EQAR” was the most widely selected activity, “To carry out quality assurance activities in other countries” was selected by only four members. Although agreement for the establishment of EQAR was reached during the London Bologna ministerial conference in 2007\(^1\), the European quality assurance market has not subsequently developed as quickly as might have been expected, nor is it apparently a high priority for many agencies and governments.

In response to the second question (which addresses the core elements of agencies’ policies for the internationalisation of quality assurance), “Priorities in exporting quality assurance services” was selected as amongst the top three choices by only four members. The most common elements of internationalisation policy emerging from this question were instead:

1. Participation of the agency in international networks (selected by 18 members and 7 affiliates)
2. Evaluation process (scope, review panels composition and appointment, etc.) (selected by 17 members and 4 affiliates)
3. Cooperation with international partners (agencies abroad) (selected by 15 members and 5 affiliates)

It should be noted that the policies referred to in the question concerning the core elements are national policies for the internationalisation of quality assurance, which in 79 percent of cases for members were developed by the QA agencies themselves, rather than national policies external to QA agencies (which are the subject of the first and third questions mentioned above).

The most common activities concerning the internationalisation for quality assurance in which agencies are currently engaged include participation in international networks and cooperation with international partners, as well as the inclusion of foreign experts in review panels. The diversity of internationalisation activities undertaken by different agencies indicates that there is not yet a single, shared definition or profile for the internationalisation of quality assurance.

Concerning inbound or imported quality assurance, it is also interesting to note that six out of the 15 affirmative responses to the question “Are there expectations expressed by the stakeholders in this regard?” explain how higher education providers themselves have expressed an interest in being externally reviewed by foreign QA agencies. Providers, therefore, may play an important part in driving the future demand for the import of quality assurance services, at least in some countries.

The responses from affiliates to this question were generally less specific. However, the most-mentioned type of internationalisation was again the provision of quality assurance services across national borders, with specific reference to allowing or encouraging national providers to seek services from foreign agencies (three respondents). Compliance with the ESG, or seeking membership of ENQA or listing in EQAR, was also mentioned by three respondents.

As seen in Table 3, the responses promote the conclusion that whilst exporting quality assurance services — in particular through EQAR — may be one of the most common aspirations for governments, it is not yet a common form of internationalisation of quality assurance, nor is it an internal priority for many QA agencies. It seems that the fact that an agency complies with the ESG, and is therefore a member of ENQA and listed in EQAR, reassures national authorities about the credibility of the agency. As discussed in the introduction to this report, the strong emphasis placed on the internationalisation of quality assurance in the formal communiqués of recent Bologna ministerial conferences sets an expectation for further progress in this area, through both EHEA and national policies. Yet, although EQAR appears to remain important for governments, there is a question of whether this importance relates to its original purpose of creating a quality assurance market in the EHEA or whether it is valued more from a reputational standpoint, alongside compliance with the ESG and membership in ENQA.
Table 3.
Which of the following activities is the Agency encouraged to perform (with specific national policies) on the internationalisation of quality assurance?

It is interesting that many governments seem to prioritise the same issues. Views on some priorities are distributed more ambiguously, such as the governments’ views on the promotion of international labels or joint quality assurance procedures. The strategy with the most diverse set of answers refers to the use of international members in decision-making bodies of agencies. In this case, no clear views can be seen.

All together, it seems that governments focus instead on internationalisation at home, urging agencies to apply international standards and to engage in international networks. They seem to be content with the original notion of internationalisation featuring cooperation and shared standards.

2.2 PUBLIC POLICIES FOR THE INTERNATIONALISATION OF AGENCIES
Internationalisation of quality assurance is not only a relevant topic for governments. Taking into account the high level of international cooperation in ENQA and other associations and networks such as the Network of Central and Eastern European Quality Assurance Agencies (CEENQA), the Nordic Quality Assurance Network (NOQA), the European Consortium for Accreditation in higher education (ECA), and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), it is not surprising to learn that agencies themselves consider internationalisation of their work an important part of their individual strategies.
How do agencies translate the policies into their daily work? All but one of the responding agencies state that they have a public policy concerning the internationalisation of quality assurance already in place. However, the survey responses suggest a certain level of dissatisfaction among the agencies and their respective internationalisation policies, considering only one in four agencies regards their internationalisation policy to be well defined. The indication is that the majority of agencies have developed policies at a general level or have limited them to certain areas; unfortunately, the answers do not divulge which areas or activities are covered by the policies, but it is fair to conclude that there is room for improvement as regards the policies’ comprehensiveness.

It should be borne in mind, however, that the level of comprehensiveness of official documentation is not always aligned with reality. It is plausible that the informal addition of international features to agencies’ daily work might develop more quickly than the more formal process of drafting and approving documents on the subject. In addition, it is reasonable to question whether specific internationalisation policies are indispensable given the fact that through the implementation of the ESG, the international dimension is - to a large extent - already present in the daily work of agencies, as far as their procedures are concerned. Hence, strategies or specific policies for internationalising quality assurance might be more relevant insomuch as they relate to “internationalisation abroad”.

The survey shows that it is first and foremost the agencies themselves who are the main drivers for the development of internationalisation policies (this is with the exception of three agencies who responded that the government was sitting in the driver’s seat). Taking into account the important role of national governments in fundamental issues of quality assurance, it should be nevertheless reassuring, when considering the independence of agencies, that it is mainly the agencies that are developing internationalisation policies. It is worth mentioning that the role of governments, again, seems to be more important in the case of affiliates, where the duties for the development of internationalisation policies are more evenly distributed between agencies and ministries.

The most important elements of an agency’s internationalisation policies include:

1. designing the review procedures with an international dimension by applying international standards, using foreign experts in panels, and so forth, and
2. collaborating with partners in international networks.

Of minimal importance (since it was only mentioned by four agencies) seems to be the exporting of services abroad or importing services from foreign agencies. In fact, the two top-rated answers are the only ones that appear to have any relevance at all, although at least one out of three agencies also mentions working together in international projects as being important. Participating in European projects seems to be of somewhat greater relevance to affiliates compared to members, which is understandable considering affiliate agencies are usually still maturing and can make better use of international cooperation for the purposes of capacity building.
What are the core elements of this policy? (Select the 3 most important elements)

<table>
<thead>
<tr>
<th>TABLE 4.</th>
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<tbody>
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<td>PRIORITIES IN EXPORTING QA SERVICES</td>
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</tr>
<tr>
<td>PRIORITIES IN IMPORTING QA SERVICES</td>
<td>4%</td>
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</table>

Table 4.

What are the core elements of this policy? (Select the 3 most important elements)

<table>
<thead>
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<th>TABLE 5.</th>
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<tr>
<td>PRIORITIES IN EXPORTING QA SERVICES</td>
<td>0%</td>
</tr>
<tr>
<td>PRIORITIES IN IMPORTING QA SERVICES</td>
<td>0%</td>
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Table 5.

What are the main strategies or tools agencies use to implement their respective internationalisation policies? It appears there is no definitive answer. Agencies use mission statements, annual plans, internal directives, and strategy plans. One agency responded that all these tools are used for implementing their policy, while another agency responded that it has a specific internationalisation strategy document. Having said this, it should be borne in mind that an internationalisation policy that is included in a mission statement but which lacks any concrete work plan might not always be fully actualised in the work of the agency.

2.3 EXPECTATIONS FROM STAKEHOLDERS REGARDING INTERNATIONALISATION

The involvement of stakeholders is a distinctive feature of quality assurance in the EHEA. Hence, one would expect that not only governments but also other stakeholders would show interest in the international dimension of the agencies’ work. Indeed, approximately two-thirds of the responding agencies report that stakeholders – in this case, higher education institutions - express certain expectations with regard to internationalisation.

However, the expectations seem to be somewhat vague and unspecific. Apart from a rather general expectation that agencies are to be involved in international activities, the remaining reported expectations represent a diverse body of interests, with none being
mentioned more than once. To name a few of the answers, higher education institutions are interested in participating in international projects with agencies, in learning about specific arrangements for the quality assurance of cross-border higher education, and in evaluating the internationalisation of the institution.

It appears that higher education institutions do not have a common understanding of how the internationalisation of quality assurance might contribute to their own development or to issues like the recognition of qualifications. Again, it shows that the term internationalisation is fairly obscure.

CHAPTER 3.
HUMAN AND FINANCIAL RESOURCES ALLOCATED TO INTERNATIONALISATION

3.1 BUDGETING OF INTERNATIONAL ACTIVITIES
As regards the human and financial resources devoted to internationalisation, the responding agencies refer mainly to three primary sources of funding: the regular budget (which is often provided by the national government or other public authority), the fees (covered directly by the higher education institutions in exchange for quality assurance services), and funds coming from international sources (international projects, funds provided by embassies, the World Bank, the European Commission, or other funding organisms).

In general, respondents indicate they use their regular budget to ensure the international presence of the agency in different networks, for conducting benchmarking or training activities, and for the inclusion of international experts in their quality assurance activities (this is to say, to ensure the internationalisation of the regular work of the agency or its internationalisation “at home”). However, specific projects and international assessment and accreditation activities (“internationalisation abroad”) tend to be self-funded.

It is interesting that, despite the increasing relevance of the internationalisation of QA agencies and services, the percentage of the total budget devoted to this area is not very significant in the case of members (8% on average). As for the affiliates, there is great variability regarding this issue, but they seem to devote more resources to internationalisation (21.8% on average).

Furthermore, governments - at least at the time of the survey - do not seem to be actively investing in transnational or cross-border quality assurance activities. Most members do not expect an increase in their national public funds for internationalisation - even though one member mentioned this to be a possible favourable evolution after a national consultation process. The affiliates seem to be slightly more optimistic, as some of them point at a possible increase in public funding for internationalisation.
It is interesting that a significant number of members are actually conducting reviews outside their boundaries. Half of the respondents declared they receive income from these activities but most agree that it is less than what was expected considering the amount of activity at the international level. In the case of affiliates, 24 percent of their income is generated by international reviews and eight percent by international projects. Overall, it could be concluded that as the cross-border higher education provision is expanding, also the agencies’ resources should be recalculated in this respect.

3.2 STAFF MEMBERS DEVOTED TO INTERNATIONAL ACTIVITIES AND THE USE OF INTERNATIONAL EXPERTS

Most members indicate they have between one and four staff members working on internationalisation issues (57%). A significant number (24%) declare they have less than one full-time equivalent devoted to these activities. On the other side of the spectrum, some members, such as the European Council on Chiropractic Education (ECCE), are “fully international” and involve all their staff members in international activities.

Of the respondents, 31 percent of members and 36 percent of affiliates have permanent staff members of foreign origin. As for temporary staff, 25 percent of members and ten percent of affiliates have temporary international employees.

Staff exchange with other QA agencies is not a common practice as just one member is currently conducting such an exchange. Most agencies (56% of members and 55% of affiliates) always or frequently involve international experts in their quality assurance activities; on the other side of the spectrum, 21 percent of members and 26 percent of affiliates rarely or never do so.

The number of staff members involved in international issues or the number of international staff members has increased or remained stable. None of the respondents have experienced a decrease in these types of staff.
4.1 METHODOLOGIES FOR INTERNATIONAL ASSESSMENT

From the survey responses, it appears that some members apply the same basic methodological principles for international activities as for domestic reviews, although only modest conclusions can be made, as only three cases out of 30 responded. More commonly, they operate with some adjustments, keeping in line with the ESG (half of the agencies responded).

However, this might be regarded as a question of balance between dominant methodologies at home and abroad. One affiliate (NCPA, Russia) states that its accreditation at national level is based on the ESG, and in this respect, it is different from the state accreditation procedures in Russia, which are based on the federal educational standards.

Agencies seem to apply similar methodology abroad as for domestic evaluations, particularly when the foreign institutions under review belong to a similar education system as the agency’s domestic structure. Since the core of activities are grounded in the ESG, and to the extent that agencies are in line with the ESG, there is consistency between cross-border and domestic activities.

Agencies tend to agree that the organisation of reviews (whether international or domestic) is the same. This “sameness” is then seen as the application of the same principles: the importance of composing panels which include academics, students, and labour market representatives; the carrying out of evidence-based processes; and the foreseeing of provisions to moderate conclusions at the end. Similarity is also exercised in terms of the model of the review; there is the inclusion of an institutional self-evaluation report, followed by an on-site visit by experts, and the production of a written report. However, one agency stated that cross-border reviews require more resources in terms of time and human effort. Since this is a likely possibility, one supposes that had there been a specific question concerning this aspect of activities, a greater number of agencies would have agreed that a higher level of involvement is necessary.

Flexibility of procedures was identified by half of the respondents as a necessity. Why be flexible? Most agencies are willing to respond to the individual needs of institutions by designing ad-hoc reference frameworks in which consideration is given to local requirements (whether set in legislation or as represented by the objectives of local agencies). Agencies stress the necessity to form panels that are truly international and to arrange a proper briefing of the panellists on the context of the higher education system, especially concerning
the legislative framework of the country in question. An essential distinction between procedures at home and abroad is that cross-border quality assurance is more often focused on enhancement rather than the fulfilment of a regulatory need.

Responsiveness is practiced in order to be successful and to create added value for institutions undertaking procedures by agencies from abroad. Some agencies (such as the Hungarian Accreditation Committee, AQ Austria, and AQU Catalunya) are very conscious of the specificity of nationally developed criteria and are thus ready to simplify the protocols to some extent when stepping out of their country’s boundaries. The other reason for some deviation in procedures might be that compliance with the ESG still allows slight differentiation in procedures as long as the basis is maintained.

In three cases it was mentioned that agencies have developed different customised services for operations abroad; in some cases a more rigid procedure was applied while others remain more adaptive. Such services are often outside the normal regulatory procedures. It could be assumed that such provision could subsequently serve in the development of quality labels (e.g. for internationalisation), for instance, or in the promotion of an agency’s reputation (e.g. “approved by...”). Nevertheless, the ESG is the main guiding document, not only for work in primary jurisdictions, but also for conducting external quality assurance procedures across borders.

Currently, there is no international protocol for bilateral agency relations established by the ESG nor by any other instruments (such as ministerial conclusions of Bologna meetings, policy papers, etc.). Instead, agencies are rather unrestricted in this aspect, and as a result, different patterns emerge.

Of the members, 43 percent inform local agencies about their activities in foreign jurisdictions while ten percent of agencies do not. In 47 percent of cases, the decision of whether to inform national QA agencies when foreigners operate within their jurisdictions depends upon factors such as the regulatory framework for higher education institutions (for example, the voluntary versus mandatory nature of their procedures, as determined by national legislation) and the regulatory framework directly applicable to the agencies (for example, if permission from national authorities is needed to operate).

![Graph 1.](image)

**Graph 1.**
When carrying out QA activities abroad, do you inform the local QA agency that you operate within its jurisdiction?
Of affiliates, only one agency has experience with cross-border procedures, and this agency makes it a practice to inform the national agencies of its activities.

4.2 QUALITY ASSURANCE AGENCIES’ RELATION TO RANKINGS

Although it is often repeated at the Bologna Process ministerial conferences and in their subsequent communiqués that higher education is a public good, pressures on institutions to internationalise and introduce new business-like features to increase competitiveness are mounting. Expectations concerning accountability are growing simultaneously. Not least, stringent public finances and competitive private funding contribute towards this trend as well. A market is de facto reality of both higher education institutions and – after the creation of EQAR and taking into account efforts to promote its usage – of European QA agencies as well.

Interests and needs for obtaining comparable and reliable information on very diverse higher education systems, individual institutions, and even single study programmes are shared by potential and current students, employers, policy makers, and funders. However, ENQA’s Position Paper on Transparency Tools (2011) observed that “the current discussion in Europe about transparency tools is still basically a discussion about rankings”.

There seems to be a widespread lack of awareness regarding the differences between quality assurance and rankings, but it is the rankings which often appeal to the public’s interest; they are not only popular but heavily debated, too. The European University Association published two reports with detailed analyses on global university rankings, mainly inferring that rankings are here to stay, but with significant limitations:

Global university rankings continue to focus principally on the research function of the university and are still not able to do justice to research carried out in the arts, humanities and the social sciences. Moreover, even bibliometric indicators still have strong biases and flaws. The limitations of rankings remain most apparent in efforts to measure teaching performance.

Everyone should bear in mind that not all publication output consists of articles in journals, and many issues relevant to academic quality cannot be measured quantitatively at all.

Ranking methodologies are repeatedly found flawed, and their results are very often misunderstood, but despite this, they have made a profound impact on access to higher education, its funding, the recognition of qualifications, and the strategic management of institutions. ENQA expressed the concern that “if HEIs are forced to focus on rankings or transparency tools, they will gear their efforts to this end, rather than striving to build a true quality culture encompassing both assurance and enhancement”.

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15 Ibid
16 Ibid
After the Leuven and Louvain-la-Neuve ministerial conference in 2009, ministers communicated their belief “that any such mechanisms, including those helping higher education systems and institutions to identify and compare their respective strengths, should be developed in close consultation with the key stakeholders”.\(^\text{18}\) It was further stated that

These transparency tools need to relate closely to the principles of the Bologna Process, in particular quality assurance and recognition, which will remain our priority, and should be based on comparable data and adequate indicators to describe the diverse profiles of higher education institutions and their programmes\(^\text{19}\).

Notably, a closed set of initiatives are identified as Bologna instruments, and they comprise qualifications frameworks, the diploma supplement, the European credit transfer and accumulation system (ECTS), and quality assurance.

The ENQA position paper\(^\text{20}\) elaborated on the lack of a common understanding of the role and meaning of “reliable information” and of “transparency”, stressing that it is definitely not mono-dimensional. In particular, two features of quality – performance and potentials – were identified as relevant in relation to the type and source of information. Three major, interrelated, developmental trends in higher education – competition, diversification, and autonomy – have been identified as reasons to promote mechanisms to collect and disseminate reliable information on higher education, but for different purposes. In the ENQA position paper, the following conclusion was made:

(...) rankings and classification tools should not be seen as quality assurance tools; in particular, they do not provide information about the potential for the future, although HEIs may draw conclusions from rankings. They might be seen rather as providers of a certain type of information that is useful for quality assurance. On the other hand, it is true that quality assurance may provide quantitative information on aspects of the performance of a programme or an institution for comparison purposes, although this is not the core purpose\(^\text{21}\).

At the Bucharest ministerial conference (2012), consent was achieved to work further on transparency tools, striving to make higher education systems easier to understand for the public and especially taking into account target groups such as students and employers. Ministers committed to “support the improvement of current and developing transparency tools in order to make them more user-driven and to ground them on empirical evidence” and to “reach an agreement on common guidelines for transparency by 2015”.

As quoted above, major European stakeholder organisations contributing to the shaping of policies and opinions have addressed the question of rankings repeatedly, given the


\(^{19}\) Ibid.


\(^{21}\) Ibid.
increased number of such initiatives, development of ranking methodologies, and their impact on institutions.

In this context, it is interesting to see that 88 percent (28 agencies) of members and 70 percent of affiliates (seven agencies) declared having no specific policy to address rankings, while others responded they do have a concrete outlook on the issue. Some more specific comments were given as follows:

The QA procedures for programme accreditation are introducing some distinctions for good programmes.

We are not making our decisions based on the ranking results. We are not involved in any kind of ranking activities.

Avoid them as much as possible.

A very different pattern is observed in relation to data received from ENQA affiliates: three agencies state they do have a specific policy to address rankings, and this policy is in favour of them. One of the affiliates (Independent Agency for Accreditation and Rating, IAAR, Kazakhstan) reports having launched a new ranking programme in 2014. Lastly, in one case, an agency reports it is in the process of developing a policy towards rankings.

**4.3 TO WHAT EXTENT IS THE WORK OF AGENCIES USED TO COMPOSE NATIONAL RANKINGS?**

Of the members, half of the agencies deny their work is used to produce national rankings, and 17 percent admit they are unaware if this takes place.

To the extent that media and consultancy organisations use public information to produce national rankings, output from QA agencies may appear among the sources as well, but a very small number of ENQA members acknowledged this. This seems to be happening without active collaboration on the part of the QA agencies. Of the respondents, 17 percent are aware that their publications, among other sources of information, serve as a source for the production of national rankings.

One agency reported that an interesting incident had taken place, which revealed the complexity of expert opinions as compared to statistical exercises:

In that case all judgements at the level of standards were attributed weights and then mathematically converted into an overall assessment (figure), leading to a ranking. It took some time to explain that qualitative assessments cannot be uni-dimensionally turned into quantitative indicators.

Responses from ENQA affiliates show that in all except one case the work of the agencies is not, or is not yet, used to generate rankings. As already mentioned, the case from Kazakhstan clearly stands out, since IAAR is directly and actively involved in the production of national ratings. IAAR explains they have launched a new ranking programme in 2014 wherein higher
education institutions participate by completing online forms. Institutional and programme accreditation are included as one of the indicators in this process.

One affiliate pointed out that its work is being used towards the production of research rankings. Another agency provided a response stating that it is suggestible to the idea of conducting rankings and that - at the time of the survey - it is being planned at the agency.

The situation could be concluded as follows:

- None of members produce rankings themselves.
- Only one affiliate composes rankings itself.
- It is likely that among the affiliates, the relationship between QA agencies and other bodies producing rankings might be stronger in the future.
- The outputs of QA agencies’ work are open to the public, and to an extent, they might become a source for rankings by media and consultancies.

4.4 TO WHAT EXTENT IS THE WORK OF AGENCIES USED TO COMPOSE INTERNATIONAL RANKINGS?

Agencies are far more sceptical towards the possibility that their work may be used for composing international rankings: 13 agencies (48%) disagree completely with the idea that quality assurance reports would be used for rankings, while five (18%) do not know whether publicly available quality assurance reports would be used for rankings. For four agencies (14%) this question appears irrelevant.

Only two agencies suppose their work is used towards production of international rankings. One agency indicated they use their own “quality seal” instead. Only one ENQA affiliate considers that their work would be used to design international rankings:

Further debate in ENQA would be welcome to clarify the issue of rankings versus quality assurance. Agencies do not seem to be entirely comfortable about their relation to the production of rankings, nor do they have explicit individual policies explaining how to address rankings (despite the ENQA position paper of 2011).

At least three agencies (two members and one affiliate) seem to have methods for distinguishing excellence in higher education. This suggests that there is a need to analyse labels more in depth and to carefully consider how to best encourage or reward the highest quality institutions.
CHAPTER 5.

BENEFITS AND RISKS OF INTERNATIONALISATION OF QUALITY ASSURANCE ABROAD

5.1 THE BENEFITS OF INTERNATIONAL QUALITY ASSURANCE ACTIVITIES

The survey presents ten different possibilities as the main benefits of conducting reviews abroad:

1. Recognition of the QA agency by international partners and stakeholders
2. Recognition of the QA agency by national partners and stakeholders
3. Enhancement of national methodology of quality assurance mechanisms
4. Improvement of the outcomes of the national quality assurance activities (quality of reports and/or consistency of decisions)
5. Generation of additional income
6. Broadening of experience of the agency
7. Convergence of external quality assurance in the EHEA
8. Strengthening of a European dimension of HE
9. Fostering of recognition of qualifications
10. Fostering of student mobility

The respondents were also given the option to state other benefits not listed in the question. In general, there are no major differences between members and affiliates, therefore the analysis is made without this division.

The collected data shows a significant number of agencies (65% of responding agencies) ranked international recognition among the three most important benefits of conducting international reviews abroad. National recognition is considered less important in terms of benefits, although it still placed among the top three (39% of the respondents).

This high interest in being recognised internationally is, to some extent, surprising a decade after the adoption of the ESG, and considering the prerequisite for agencies to be reviewed internationally in order to be members of ENQA or listed in EQAR. Perhaps ENQA and EQAR are not sufficiently well known as organisations at national level? It could be fruitful to consider whether European QA agencies are satisfied with their current level of international recognition and, if so, whether they perceive that it is already sufficient for them to operate internationally, beyond national borders.

The second block of possible benefits - those gathering the mechanisms for the improvement of quality assurance and the work of the agencies - shows some divergence in the way agencies respond to the process of ranking as suggested in the questionnaire. In this block,
a significant number of agencies (45%) mentioned the expansion of their experience as the most important benefit of conducting reviews abroad.

It is interesting to see, however, the different perceptions of agencies when the benefit is addressed as “gaining convergence in the EHEA”. While the question on gaining experience abroad resulted in a concentration of responses within the top three choices, the responses for this question show less enthusiasm in connecting international reviews with greater opportunities for the convergence of quality assurance at the European level. Sixty-eight percent of the agencies do not consider this benefit among the most important. One conclusion might be that perhaps European QA agencies already appreciate the current level of convergence for quality assurance within the EHEA.

In general, the attempt to link the improvement of methodologies to quality assurance mechanisms by conducting international reviews is less obvious than the connection between recognition and international reviews. Is the existence of alternative mechanisms such as networking, international projects, conferences, and meetings a better solution for gaining knowledge for methodological improvement?

According to the agencies, generating additional income by conducting international reviews appears as a less important motivation. Of the respondents, 19 out of 38 ranked this benefit as the least important. Given the relative lack of interest, this result should be taken into consideration if any European-level policy initiatives aimed to develop a European market for external quality assurance or a platform for cross-border quality assurance activities are to be devised.

The last section of benefits collects those which produce impacts on the higher education system by:

- strengthening the European dimension of higher education,
- fostering the recognition of qualifications, and
- fostering the mobility of students.

It is noteworthy that the German Accreditation Council (GAC) ranked the above three benefits as the most important. Is this particular perspective a consequence of the configuration of their agency as a body not performing the same functions as the others? The other agencies ranked the same three with less enthusiasm; only 26 percent of the agencies underline the strengthening of the European dimension in the quality assurance methodology as important, followed by 16 percent for the recognition of qualifications and 13 percent for student mobility.

In fact, agencies do not rank those benefits among the most important. Particularly clear is the view of the agencies on issues concerning the European dimension and the recognition of qualifications. The question here is to what extent is it realistic to link student mobility with the benefits of conducting international reviews abroad? Concerning the issue of recognition, perhaps the current legal framework is promoting that by other means.
Table 6.
Members and affiliates: What are the main benefits of conducting reviews abroad?
* The respondents were asked to value the risks on a scale from one to 11, and the scores are determined by weighted values assigned to each rank. The scores may be compared to a maximum possible score of 429 and a lowest possible score of 39.

Finally, the survey gave the possibility to mention additional benefits of conducting reviews in other countries. One agency suggests that there is a chance to influence the future of quality assurance.

**5.2 THE RISKS OF INTERNATIONAL QUALITY ASSURANCE ACTIVITIES**
Whereas agencies feel comfortable operating within a national quality assurance framework, and in most cases with exclusivity, the opportunities for greater international quality assurance activities sometimes come with the appearance of risks.

Five possible risks are proposed in the survey:

1. Higher education institutions choosing an agency whose accreditation framework is the easiest with which to comply
2. Negative influence of imported methodologies on national quality assurance mechanisms (imported methodologies might hinder national quality assurance mechanisms from being adequate/fit for purpose)
3. Risks regarding the quality of outcomes of international quality assurance procedures (i.e. experts are not adapted to the national context)
4. Financial problems (investments in preparing international quality assurance activities are not compensated)
5. Additional costs incurred for internationalisation hindering the development of other national quality assurance activities

The above-mentioned risks are somewhat inconclusive, as agencies stated that risks should be considered individually and within their own context. This ambiguity is possibly
a consequence of the somewhat under-developed market for cross-border external quality assurance or a lack of experience among practitioners in the sector. Although some national regulations are being changed to allow international reviews to take place, the actual implementation is - until now - very limited. In fact, one of the agencies mentioned that it is premature to define risks for international activities.

Agencies seem to be only a little worried about the risk of a negative influence of imported methodologies and the hindrance on development due to additional costs. They seem to be more worried about higher education institutions choosing an agency whose accreditation framework is the easiest with which to comply.

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<th>TO SOME EXTENT</th>
<th>YES</th>
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<td>Higher education institutions choosing an agency whose accreditation framework is the easiest with which to comply</td>
<td>12.50%</td>
<td>52.50%</td>
<td>35.00%</td>
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<td>Financial problems (investments in preparing international quality assurance activities are not compensated)</td>
<td>21.62%</td>
<td>45.95%</td>
<td>32.43%</td>
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<tr>
<td>Risks regarding the quality of outcomes of international quality assurance procedures (i.e. experts are not adapted to the national context)</td>
<td>15.00%</td>
<td>55.00%</td>
<td>30.00%</td>
</tr>
<tr>
<td>Additional costs incurred for internationalisation hindering the development of other national quality assurance activities</td>
<td>30.00%</td>
<td>60.00%</td>
<td>10.00%</td>
</tr>
<tr>
<td>Negative influence of imported methodologies on national quality assurance mechanisms (imported methodologies might hinder national quality assurance mechanisms from being adequate/fit for purpose)</td>
<td>27.50%</td>
<td>67.50%</td>
<td>5.00%</td>
</tr>
</tbody>
</table>

Table 7.
Members and affiliates: From your perspective, what are the main risks of international quality assurance activities?

Besides the proposed risks, the respondents describe some other possibilities:

- The risk of exposing students to unsystematic information concerning quality assurance results produced by the national agency and/or foreign agencies.
- Situations where governmental authorities pose ad-hoc or not well justified requests to the agencies. Agencies reacting to governmental initiatives that are not well planned may result in unfavourable outcomes which may harm the reputation of the agency.
- Preparation of documents in the native language and the use of experts speaking the native language might be a limitation for the internationalisation of procedures.
- Greater bureaucracy if agencies working at the international level have to be assessed by different governmental bodies.
- The presence of international accreditation mills.
5.3 MAIN LIMITATIONS OF DEVELOPING INTERNATIONAL QUALITY ASSURANCE ACTIVITIES
The survey proposes four different limitations in conducting quality assurance activities abroad; two of them concern the availability of resources, one concerns the negative effects of competition, and the last concerns regulations:

1. The agency budget is not sufficient and flexible (amount of funds and mandate) to introduce the issue of internationalisation on quality assurance services
2. The number of experts and staff trained for international quality assurance services is too limited, the workload thus not permitting agencies to conduct international quality assurance services
3. Competition between agencies at international level prevents them from sharing experts
4. Limitation of jurisdiction for the agency to function outside (political or legal limitation)

The survey shows that for QA agencies, the most significant limitation when developing international activities is the availability of financial resources. The second most popular limitation is the number of experts and staff trained for international quality assurance services, and the least important limitation is the existence of a competition which prevents agencies from sharing experts.

Finally, it is important to point out that 11 agencies state that the jurisdictional limitations related to functioning outside their territory is seen as most significant.

5.4 IMPORTING QUALITY ASSURANCE SERVICES
The survey took into account that national legislations include regulations for the implementation of imported quality assurance procedures and services. In this respect, members from Austria, Bulgaria, Denmark, Estonia, Flanders, France, Germany, Ireland, Poland, Romania, and Switzerland stated that their national legislation includes regulations for the implementation of imported quality assurance procedures and services. Among the affiliates, only three agencies inform that national legislation contains regulations concerning imported quality assurance services.

The analysis of the answers suggests that not all respondents are aware of the national regulations concerning the import of quality assurance services in their own jurisdiction.

Those agencies mentioning regulations for importing quality assurance services refer to restrictions concerning the scope of the imported quality assurance service and/or the provider of those services. In one of the cases, the regulation establishes a role for the national agency to act as a supervisor when a quality assurance service is imported.

The survey shows that a significant number of international quality assurance services that are directly implemented by higher education institutions are not brought to the immediate or direct attention of QA agencies. In fact, higher education institutions are the most active party in terms of taking the initiative to import quality assurance, to a much larger extent than agencies and governments.
The survey proposed the following motivations for QA agencies in importing quality assurance services, some of which make reference to the quality of the service, for example in terms of reputation:

- Better reputation of a foreign/international review in general
- Interest in quality labels
- Improved international recognition

The survey also asked for other motivations:

- Better reputation of the QA agency
- Lower costs of quality assurance procedures
- Free choice of quality assurance procedures

Concerning the quality of services, there is a significant number of agencies with a positive view about imported international reviews. It is also interesting to see that the respondents consider there is better recognition of the quality assurance outcomes in cases of imported quality assurance services. Less clear is the respondents’ motivations for implementing international labels. In this question, the opinions are divided between a group of “enthusiasts” and those who are neutral.

Finally, free choice and lower costs seem to not be a motivating factor for importing quality assurance services. One member agency mentions the variety of procedures available at the international level as a motivation to choose such services.

5.5 Views about foreign quality assurance agencies operating in national jurisdiction

The respondents reflect upon the possibility of foreign agencies operating within their jurisdiction in a slightly ambivalent manner. First of all, there are situations in which national QA agencies still maintain their advantages and privileges when competing with foreign agencies. This view can be seen in the following statements: “Regardless of the foreign QA agency’s activity, all study programmes have to, by law, obtain accreditation on the recommendation of the national QA agency” or “Our institutions are obliged to undertake our process, which bear no additional costs to them”. A sort of a “not my business” view can be heard in the following statement: “Seeking international certificates or quality labels is entirely the matter of higher education institutions”.

Privileges of national QA agencies might be heard in a view expressed in the survey that “the logic of markets/competition does not fit with compulsory external quality assurance that has a direct legal consequence because of the risk of the race to the bottom”. Also mentioned are potential inconsistencies for national authorities seeking some standardisation of procedures or outcomes in order to be able to make comparisons: “The national agency has some overarching responsibility which cannot perform fully because some higher education institutions choose foreign agencies”.


Some critical views from national agencies arise, for instance:

We find mainly agencies which provide specific quality labels (business is a very active field). They are usually quite expensive, and I am not sure that they are fostering real enhancement. They are mainly business oriented, which in my view is not a very positive feature.

As a conclusion, it is relevant to make a distinction between compulsory and voluntary quality assurance processes. For those agencies that operate on a voluntary or complementary basis, views are more positive:

Foreign agencies operating in our country might well be an added value in external quality assurance which is not compulsory or does not have direct consequences. Foreign agencies collaborating with us in joint projects/procedures are of [great] benefit for all partners involved.

The agency has nothing in particular against foreign QA agencies operating in the country when these bodies really offer something beyond the national standards. This means a higher quality reference, a discipline-oriented label, a particular scope of quality assurance/accreditation procedure not included in the national legal framework but [which is] useful for a particular institution, faculty, or programme.

The difference between compulsory and voluntary procedures can also be elaborated for those procedures that are enhancement oriented.

When they do seek foreign QA agencies’ services it is always either within internationally funded projects, when their work is strictly focused on enhancement, or these are professional agencies (e.g. business, engineering) which function as prestigious labels for international students and teachers in a specific field. The institutions that undergo such procedures are usually better prepared to undergo our procedures, and so far this has been a synergetic relationship.

Some respondents even hope to strengthen their presence in “national markets”, although they recognise the limitations of operating internationally:

It should be promoted for experimental processes and to facilitate the continuous improvement of national QA agencies by exchanging good practices. I have doubts about a generalised international market on quality assurance or about a massive implementation of these types of processes.

Different types of accreditation certainly complement the institutional and programme-level quality assurance, and they may significantly support the developmental work at higher education institutions. However, as not all accreditation reports are published, the transparency requirement is not always being met.
Thus in some countries, the presence of renowned international agencies is appreciated. At the same time, a respondent raises a concern:

*We have had experience with the activity of unrecognised international QA agencies that pretend to create an international quality assurance system and sell accreditation certificates for a fee. In our view it is cheating (because they do not comply with any national and international quality assurance standards); it confuses the public, and it can damage the trust in the quality assurance system.*

Although only modest conclusions can be drawn from these individual responses, the earlier chapters’ observations about a still young, unorganised quality assurance market can be considered as reconfirmed in this chapter.
CONCLUSIONS

There is a diversity of activities undertaken by QA agencies that can be associated with internationalisation. At the same time, it can be concluded that there is not yet a single, shared definition for the internationalisation of quality assurance.

There is a wide variety of international work that is being carried out in agencies: quality assurance of programmes, institutional reviews, quality audits, internal quality assurance of higher education institutions, and consultancy. The most common activities, however, include engagement in international networks and cooperation with international partners, as well as the inclusion of foreign experts in review panels.

Governments generally support the internationalisation of quality assurance, but their support is manifested in a wide range of different approaches. In general, it seems that governments focus on internationalisation “at home”, while urging agencies to apply international standards and to engage in international networks. They seem to be content with the original notion of internationalisation featuring cooperation and shared standards. The ESG remains the main guiding document not only for work in domestic settings but also for conducting quality assurance activities across borders.

It can also be concluded that while exporting quality assurance services — in particular through agency registration in EQAR — appears to be among the most common aspirations for governments, it is not yet very common in practice, nor is it yet an internal priority for agencies. It seems that complying with the ESG serves to reassure governments about the credibility of agencies.

Despite the solid support from governments towards internationalisation, it is interesting to see that the budget governments devote to this area is not significant, and agencies do not expect a major increase in their international budgets in the coming years. In the meantime, a significant number of members are conducting reviews outside their borders and half of the respondents declare that they receive less income from these activities than they would expect.

Overall, the survey indicates a shared view among QA agencies about the unexplored needs and effects of the development of a European market in quality assurance for higher education. It seems obvious that governments and agencies have not sufficiently calculated the real costs for resources required to efficiently and effectively run an international quality assurance market. In terms of finances and regulations - but also in terms of expertise and knowledge - the market is complex. The eventual effects of a potential European quality assurance market remain uncalculated - not only the positive ones but also the eventual negative implications if competition among QA agencies is not implemented fairly. Thus internationalisation “abroad” would need more attention and more governmental support in order to mature.

Finally, it seems clear that a better understanding and increased transparency on the international quality assurance activities of agencies is a requirement for the further development and improvement of quality assurance for higher education in Europe, regardless of the possible development of a European market in the sector.
REFERENCES


ANNEX: THE QUALITY PROCEDURES QUESTIONNAIRE

4TH SURVEY ON QUALITY PROCEDURES IN EUROPEAN HIGHER EDUCATION

“COOPERATION AND COMPETITION IN THE PROVISION OF QUALITY ASSURANCE SERVICES”

INTRODUCTION
The main objective of this survey is to document and analyse the current methodological state-of-the-art and strategies in terms of internationalisation of QA in the EHEA and in terms of QA as a contributor to HE internationalisation. It aims to provide information regarding the existing internationalisation policies at national level, as well as strategies and tools implemented by QA agencies across the EHEA.

The survey is conducted for ENQA’s Quality Procedures Project (4th edition). The following members serve on its Steering Committee:
- Josep Grifoll – Chair
- Achim Hopbach
- Anthony McClaran
- Teresa Sanchez
- Aurelija Valeikiene
- Nathalie Lugano – Secretary

The survey is generated towards ENQA full members and ENQA affiliates that are QA agencies.

The survey is organised in seven sections:
1. Current mandate for internationalisation of QA agencies
2. Methodology for internationalisation assessment
3. Resources allocated to internationalisation
4. Types of internationalisation of QA: Internationalisation at home and Internationalisation abroad
5. Expectations on internationalisation of QA
6. Risks and benefits of internationalisation of QA abroad
7. Importing QA services

The questionnaire contains 47 questions. You do not have to complete the survey in one sitting, although you need to complete the survey from the same computer. If you leave the page while filling in the survey, your responses are automatically saved. When accessing the link again, you may go back to previous pages in the survey and update existing responses until the survey is completed.

The closing date for this survey is 5 October 2014.

If you have any questions about the survey please contact Paula Ranne (paula.ranne@enqa.eu).
RESPONDENT DATA
ENQA encourages respondents to disclose their identity so that their responses may be mentioned as an example or emphasised as good practice. Responses will not be used in any ENQA-coordinated review of your agency or for any purpose other than that stated above.

Respondent’s contact information
Name: ________________________________________________
Email: ________________________________________________
Tel: ________________________________________________
Country: ________________________________________________

Name of your agency: ________________________________________________

What is your agency’s relation to ENQA
☐ Full member
☐ Affiliate

Is your agency a subject-specific agency?
☐ Yes
☐ No

Grant/refusal of permission to ENQA to publish your responses
☐ I give permission for my Agency to be identified with the responses I give in the final report.
☐ I do not give permission for my Agency to be identified with the responses I give in the final report
(your responses will be reported anonymously).

1. Current mandate for internationalisation of QA agencies
What is the position of your Government concerning the internationalisation of QA?
Is there a public policy for the internationalisation of the QA agency and its activities at home and abroad (projects, reviews, panels)?
☐ Yes (well defined)
☐ Yes (in some areas)
☐ Yes (but only on a general level)
☐ No (go to QXX)

Are there expectations expressed by the stakeholders in this regard?
☐ Yes
  If yes, please explain:
☐ No

Who has developed this policy?
☐ The QA agency (mainly)
☐ The government (mainly)
☐ Other stakeholders, please specify:
☐ Others, please specify:
How is this policy implemented in the agenda of your Agency? (Please provide documentation)
- [ ] It is included in the mission statement
- [ ] It is included in the annual plan
- [ ] It is included in internal directives
- [ ] It is included in the strategy plan
- [ ] Other:

What are the core elements of this policy? (Select the 3 most important elements)
- [ ] Evaluation process (scope, review panels composition and appointment, etc.)
- [ ] Type of outcomes (reports / decisions)
- [ ] Participation of the agency in international networks
- [ ] Cooperation with international partners (agencies abroad)
- [ ] Priorities in exporting QA services
- [ ] Participation in European projects
- [ ] Priorities in importing QA services
- [ ] Other

Which of the following activities is the Agency encouraged to perform (with specific national policies) on the internationalisation of QA?

<table>
<thead>
<tr>
<th>Activity</th>
<th>NO</th>
<th>TO SOME EXTENT</th>
<th>YES</th>
<th>YES, AS A PRIORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>To use international peers in review panels</td>
<td></td>
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<tr>
<td>To include international members in the agency’s decision-making body</td>
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<tr>
<td>To promote international recognition of study programmes</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>Internationalisation of national accreditations (international labels)</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>To carry out QA activities in other countries</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>To be actively present in international networks (other than ENQA)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>To be listed in EQAR</td>
<td></td>
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</tr>
<tr>
<td>To conduct joint QA procedures with QA agencies from other countries</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>To develop international standards (other than the ESG)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Is fostering internationalisation of QA an explicit part of your Agency’s strategy?
- [ ] Yes (please specify)
- [ ] No
2. Methodology for internationalisation assessment
What is the predominant QA methodology that your Agency uses when conducting cross-border activities? (QA of programmes/institutions, assessments, audits…)

To what extent does the methodology for international activities differ from that for domestic activities? (Do you use a different reference framework? Do you adapt the content of the reviewers training? Is the organisation of the review different?)

Do you inform national QA agencies when you operate within their jurisdiction?
- Yes
- No
- It depends on the process

Does your Agency have a specific policy to address rankings?
- If yes, please explain: _________________________________

To what extent is the work done by your Agency used to compose national rankings?

To what extent is the work done by your Agency used to compose international rankings?

3. Human and financial resources allocated to internationalisation
Does your Agency have a specific budget for the internationalisation of QA?
- Yes
- No (go to QXX)

If so, what is the percentage of the total budget devoted to this area?

What are the main sources of funding for the internationalisation of QA in your Agency?
Considering the total budget of the agency, what is the percentage of income generated by international activities?

- International reviews: _________________________________
- International projects (total income as project coordinator or partner, not overhead): _________________________________

Do you expect an increase of national public funds for the internationalisation of QA activities?
- Yes
- No
Comment:

How many staff members (full time equivalent) are predominantly working on international QA in your Agency?

How many international staff members are employed at your Agency?
Permanent staff: ____________________________________________
Temporary staff: ____________________________________________
Staff in exchange with other ENQA members: ____________________

How have these numbers of staff members evolved over the past 5 years?

Please list the type of QA activities undertaken by your Agency and the number of international experts per activity:

How often have experts from other countries been involved in QA activities undertaken by your Agency in the last five years (excluding international projects)?

☐ Always / frequently
☐ Sometimes
☐ Rarely
☐ Never

4. Types of internationalisation of QA
In which HE system(s) / country(ies) is your Agency operating regularly (agency’s primary domain)?

What core evaluation activities are performed outside the Agency’s primary domain (excluding projects and pilot procedures)?

☐ Joint evaluations
☐ Evaluations
☐ Certifications
☐ Accreditations
☐ Audits
☐ Other:
How many international QA procedures have been carried out in other countries (over the last 5 years)?

**Internationalisation at home**
International QA procedures undertaken by your Agency within its own primary domain (over the last 5 years)

- [ ] National assessments with international review panel members
- [ ] National assessments in cooperation with foreign QA agencies
- [ ] Benchmarking analysis performed at international level
  Please explain:
- [ ] Use of international reference frameworks/standards in national assessments
  Please explain:

International experts as members of Agency’s governing or advisory body
Please explain:

- [ ] Other: ____________________________

**Internationalisation abroad**
- **Cross-border activities**
  International QA activities undertaken by your Agency outside its own primary domain

- [ ] Evaluations conducted individually by the agency in other countries (within and outside the EHEA). If so, how many were carried out over the last 5 years?
- [ ] Joint evaluations with other QA agencies.

  If so, how many were carried out over the last 5 years?
- [ ] European Projects as coordinator.
  Please mention on which topics and how many
- [ ] European Projects as partner. Please mention on which topics and how many.
- [ ] Development of new QA tools with other agencies (ex.: Codes of good practice, methodologies for joint reviews, certificates of excellence, labels, evaluation protocols on e-learning)
  Please explain:

Involvement in ENQA working groups. Please specify which groups and how many staff members took part.

- [ ] Other: ____________________________
Has your Agency signed cooperation agreements with other QA agencies? (for the appointment of reviewers, joint evaluations, mutual recognition, etc.). Which agencies and countries are involved in those agreements?

☐ Yes
☐ No

Comment: ____________________________________________

Is your Agency involved in the development and/or the implementation of any procedure for the international recognition of national HE programmes? (labels, certificates...)

☐ Yes
☐ No

Comment: ____________________________________________

If so, what are the expected benefits of this approach from the agency’s point of view?

5. Expectations on internationalisation of QA

Which expectations from national stakeholders have you identified?

Which expectations of national stakeholders on the internationalisation of QA are covered with your current system?

What are the expectations not currently covered in your system?

Which expectations from international stakeholders have you identified?

If you have received a new mandate from the Government for the internationalisation of QA activities, please indicate the date when the mandate was issued:

Please indicate which of the following will be specifically affected by the new mandate:

☐ Priorities in performing QA procedures abroad
☐ Aims of international QA activities
☐ Methodologies of international QA activities
☐ Transparency of international QA activities
☐ Internationalisation at home
☐ Other: ________________________________
6. Risks and benefits of internationalisation of QA abroad

From your perspective, what are the main benefits of conducting reviews abroad?

- Recognition of the QA agency by international partners and stakeholders
- Recognition of the QA agency by national partners and stakeholders
- Enhancement of national methodology of QA mechanisms
- Improvement of the outcomes of the national QA activities (quality of reports and/or consistency of decisions)
- Generating additional income
- To broaden the experience of the agency
- Convergence of external QA in the EHEA
- Strengthening of a European dimension of HE
- Fostering recognition of qualifications
- Fostering student mobility
- Other: ____________________________________________

From your perspective, what are the main risks of international QA activities? (Select from the following options, and considering the scale: no, to some extent, for sure)

- HEIs choosing an agency accreditation framework to be easiest to comply with
- Negative influence of imported methodologies on national QA mechanisms (imported methodologies might hinder national QA mechanisms from being adequate/fit for purpose)
- Risks regarding the quality of international QA outcomes (i.e. experts are not adapted to the national context)
- Financial problems (investments in preparing international QA activities are not compensated)
- Additional costs incurred for internationalisation hinder the development of other national QA activities
- Other risks, please specify:

From your perspective, what are the main limitations of developing international QA activities?

- The agency budget is not sufficient and flexible (amount of funds and mandate) to introduce the issue of internationalisation on QA services
- The number of experts and staff trained for international QA services is too limited, the workload thus not permitting to conduct international QA services
- Competition between agencies at international level prevents them from sharing experts
- Limitation of jurisdiction for the agency to function outside (political or legal limitation)
7. Importing QA services
Does the national legislation include regulations for the implementation of imported QA procedures and services?

If so, do they apply to certain types of higher education provision or certain higher education sectors?

Do higher education institutions systematically contact your Agency about the international QA services (international accreditations, international certificates) they implement directly?
- Yes, often
- Yes, sometimes
- Rarely
- Not at all

Who takes the initiative to import QA services?
- Your agency
- HE institutions
- The government

Comments: 

What motivations did you observe in importing QA services?
- Free choice in QA procedures
- Higher reputation of the QA agency
- Higher reputation of foreign/international review in general
- Looking for quality labels
- Better international recognition
- Lower costs
- Other: 

What is your opinion about foreign QA agencies operating in your country?
THE PRESENT PUBLICATION is the result of the 4th ENQA survey on quality procedures of quality assurance agencies across Europe and beyond. This report presents a collection of current features of good practice in external quality assurance within the new priorities formulated by ENQA and following the ministerial Communiqués, highlighting the connection between the practices and the expected benefits for higher education institutions and stakeholders. In addition, the present report identifies practices that are expected to be implemented by quality assurance agencies, as well as areas where progress needs to be made, thus proposing a vision of the future of quality assurance procedures.