ENQA REPORT TO MINISTERS RESPONSIBLE FOR HIGHER EDUCATION IN THE EHEA

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1. INTRODUCTION

The European Association for Quality Assurance in Higher Education (ENQA) is the largest association of quality assurance (QA) agencies active in the European Higher Education Area (EHEA).

ENQA's mission is to:
- drive the development of quality assurance by representing agencies internationally and supporting them nationally
- provide agencies with comprehensive services and networking opportunities
- promote the enhancement of quality and the development of a quality culture in higher education.

ENQA works in a consultative manner with its members and affiliates, European partners and fellow associations, and - particularly in the context of the Bologna process - with its E4 partners. ENQA is a founding member of the European Quality Assurance Register (EQAR).

ENQA contributes to the promotion and enhancement of quality and the development of a quality culture in higher education through its series of projects, studies, and events. It envisages an EHEA in which students have access to high quality education and can achieve qualifications that are respected worldwide.

This goal is aided by efforts to promote and ensure that its members work in line with the revised Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). ENQA remains open and responsive to the diversity of higher education systems and quality assurance approaches and adheres to the core values of transparency, independence, and integrity.

While the revised ESG maintain their original function to:
- set a common framework for quality assurance systems at the European, national, and institutional level,
- enable the assurance and improvement of quality of higher education provision in the EHEA,
- support mutual trust (thus facilitating recognition and mobility within and across national borders), and
- provide information on quality assurance in the EHEA,
the revised version allows for quality assurance assessments to respond more sensitively to the changing higher education context, particularly as a more student-centred approach is embraced.

The revised ESG will continue to be used - as the current version is - as the criteria by which both membership in ENQA is granted and listing within EQAR is achieved. Compliance with the ESG, as demonstrated by an external review, has determined the current composition of ENQA, which proudly boasts 48 member agencies from 27 European countries. Since 2012, ENQA has been the main contractor of external reviews of European QA agencies, having coordinated and carried out almost all of the reviews used for determining ENQA membership and EQAR listing. ENQA has worked assiduously to streamline and professionalise this service.

In addition to its members, ENQA's work is supported by its affiliates, which account for another 47 bodies with interest in quality assurance operating within Europe, East Asia, the Middle East, and the Americas. This increased interest in ENQA services by quality assurance networks in other world regions, as well as of individual agencies outside the EHEA, is testimony to the success of the European approach to the quality assurance of higher education.

QUALITY ASSURANCE OF CROSS-BORDER HIGHER EDUCATION

ENQA's favourable international reputation has afforded it numerous opportunities for collaboration in quality assurance projects within and outside Europe. Most recently, ENQA has been engaged in a project1) on the quality assurance of cross-border higher education. ENQA - in cooperation with global partners - is working on the development of a common European approach for assuring the quality of inbound and outbound higher education provision (which may include double/joint programmes, offshore campuses, networks, mergers, and virtual education) delivered across borders (particularly in the Gulf and Asia-Pacific regions).

1) QACHE – Quality Assurance of Cross-border Higher Education (co-funded by the Erasmus Mundus programme of the European Union) https://qache.wordpress.com
As the cross-border operations of European higher education institutions (HEIs) are becoming increasingly common, the project has identified an urgent need to enhance the national and international supervision of cross-border higher education (CBHE) - which is currently very fragmented - and to address the lack of information concerning CBHE and different national regulatory approaches to CBHE. Governmental support and commitment to finding a clear national - and thereafter European framework - for CBHE is crucial. Furthermore, strengthening cooperation between agencies, especially from sending and receiving countries, is seen as the next step for facilitating and enhancing information exchange, policy dialogue, and the regulation of CBHE.

As the internationalisation of higher education continues to proliferate, creating better opportunities by widening access to higher education, addressing skills gaps, and furthering global citizenship, ENQA is committed to protecting the interests of students while promoting policy dialogue and mutual understanding of cross-border quality assurance practices – within Europe and other world regions.

**ENQA SURVEY OF AGENCIES’ INTERNATIONAL ACTIVITIES**

In 2014, ENQA carried out a survey of all its member agencies as part of the fourth edition of ENQA’s Quality Procedures Project. The project has revealed that – despite the commitment of ministers in 2012 to grant EQAR-registered agencies the freedom to perform their quality assurance activities across the EHEA - very few agencies have done so or do so on a regular basis. The initial enthusiasm for the development of a European quality assurance market (and participation therein) has seemingly waned.

The project reveals that while registration within EQAR remains a top priority for governments and QA agencies within Europe, performing cross-border quality assurance activities is not. Owing to the purported lack of government support and/or encouragement in this regard (in the way of national policies), the project members foresee a revision of expectations concerning the future of a European quality assurance market.

The Quality Procedures Project has, however, revealed an increased emphasis on the wider aspects of the internationalisation of the work of QA agencies. For example, QA agencies indicate that national policies encourage the increased use of international peers in review panels; more involvement of international members in the governance of QA agencies; active participation in international quality assurance networks; more collaboration with international partners, and the international recognition of study programmes. Sharing of good practice, exchanging information, and engaging in joint projects that support mutual learning and the development of quality assurance are considered by the agencies as the most important forms of internationalisation.

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**FULL MEMBERS OF ENQA (APRIL, 2015)**

- ENQA full members
- EHEA countries, where ENQA has no full members
- non-EHEA countries
QUALITY ASSURANCE OF JOINT PROGRAMMES
At the 2012 ministerial conference, ENQA introduced the need for a truly European approach for the quality assurance of joint programmes – one that effectively facilitates the “integrated approaches to quality assurance of joint programmes [and] genuinely reflects their joint character”. From 2013 to 2015, ENQA was represented in the ad hoc expert group responsible for drafting a proposal to progress this initiative. The European approach, which relies on the ESG and the EHEA Qualifications Framework (QF-EHEA), aims to accommodate the needs of the cooperating HEIs, while respecting the requirements of the national frameworks, in order to support this uniquely European endeavour. The dismantling of further obstacles to international cooperation between HEIs with regard to the development of joint programmes is besought of ministers and national policymakers.

While the Quality Procedures Project indicates that agencies listed on EQAR are not extensively involved in institutional or programme evaluations outside of their home jurisdictions, they are, however, eminently situated for conducting reviews of joint programmes. Only through a single European quality assurance procedure for such programmes can their truly European nature be fully recognised and appreciated.

ENHANCING THE TRANSPARENCY FUNCTION OF QA REPORTS
The massification of higher education means that there is increased interest and competition in European higher education. External quality assurance reports can be used as one tool for navigating the education marketplace. However, the wide variation in the reports’ content, structure, and publishing channels overburdens the process of choosing an adequate institution and/or programme for prospective students.

In order to combat this issue and enhance the role of quality assurance reports as a source of reliable and comparable information, ENQA - in collaboration with QA agencies and with support from the EU – has researched2 the current state of the content, structure, and publication of quality assurance reports, as well as the expectations and demands from stakeholders concerning the reports. In order to respect the different needs of various stakeholders, ENQA recommends that QA agencies produce two separate reports for each programme and/or institutional review: first, a detailed comprehensive report aimed mainly towards the HEI undergoing the review and, second, a summary report aimed towards the general public, such as students, parents, and institutions seeking partners. The recommendations and guidelines (for comprehensive and summary reports, respectively) are designed to support QA agencies in providing easily understandable, comparable, and accessible information to their target groups. The prescribed widespread provision of these summary reports – which were previously produced in limited and varying contexts – will improve the transparency dimension of European higher education and enhance its mobility aspect.

3. QUALITY ASSURANCE IN THE EHEA: PRIORITIES FOR THE FUTURE

INTERNATIONALISATION OF QUALITY ASSURANCE AND THE REVISED VERSION OF THE ESG
The internationalisation of quality assurance is becoming an increasing part of the European higher education landscape. It is a complex phenomenon, and it should not be reduced to the import and export of quality assurance services between countries in the EHEA. For QA agencies, internationalisation starts at home, with a variety of actions, such as the use of international experts in national quality assurance procedures, the application of international quality assurance standards, the exchange of good practices, networking, and collaboration among QA agencies. Most agencies agree that European-level collaboration in quality assurance is a much more relevant internationalisation tool than conducting quality assurance activities outside their country’s borders.

The most powerful way to internationalise quality assurance in the EHEA has been – since their adoption in 2005 – the implementation of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Now, with their revision completed between 2012 and 2015, the adaptation of all national systems – also, and particularly, in countries which have not yet fully developed quality assurance systems – to the revised ESG will be an important priority.

ENQA exhorts all countries in the EHEA to carefully inspect the requirements set forth by the revised European framework for quality assurance, including the European Approach for the Quality Assurance of Joint Programmes - and ensure that any national laws or regulations making their implementation impossible or difficult for the QA agencies or HEIs be removed with urgency.

BENEFITS AND RISKS OF CROSS BORDER QUALITY ASSURANCE SERVICES
While “internationalisation at home” has clear positive consequences for the overall level of quality of the higher education sector, the long-term impact of importing and exporting quality assurance services across borders is not yet clear. Initial experiences show that while competition among agencies for voluntary quality assurance processes seems to be considered an added value by all parties involved, driving

2) EQArep- Transparency of European Higher Education through public Quality Assurance Reports (co-funded by the Lifelong Learning programme of the European Union) https://eqarep.wordpress.com
agencies to compete in compulsory external quality assurance processes could have some serious pitfalls in the absence of a market regulator.

The revised ESG recognise that the diversity and growing expectations for higher education requires a fundamental shift in its provision and that HEIs themselves are also becoming more diverse in their mission and mode of educational provision. Even though all ENQA members operate according to the ESG, the services they offer can be substantially different in nature (audit, assessment, accreditation, etc.) and serve different objectives, which are quite often linked to specific national agendas. Applying a pure market logic in this situation (i.e. HEIs to freely choose any quality assurance operator - regardless of the specificities of the particular procedure) does not seem the most appropriate way to preserve standards.

Offering opportunities for HEIs to choose an agency that best fits their needs and interests is laudable, and the recognition of quality assurance decisions by agencies operating in line with the ESG is a necessary condition for mobility and recognition of studies to be fully realised. However, national governments must remain vigilant of the potential effects of the development of an unregulated, cross-border quality assurance services market. Related risks should be carefully analysed and possible corrective or regulatory measures considered. Guidelines of good practice for cross-border quality assurance activities should be developed and used by all agencies in the EHEA to ensure that the internationalisation of quality assurance will have the positive effects it is expected to have and to minimise the associated risks.

**INDEPENDENCE OF QUALITY ASSURANCE AGENCIES**

Quality assurance aims at building trust and increasing recognition and acceptance of higher education qualifications across Europe. In order to achieve this goal, it is essential to ensure that all quality assurance procedures and decisions applied to HEIs and qualifications are based solely on expertise. QA agencies should have full responsibility for their operations and the outcomes of those operations without third party influence.

Particularly, as the new version of the ESG states, the legal and organic environment of the agency should respect:

- its organisational independence, demonstrated by official documentation that stipulates the independence of the agency’s work from third parties, such as HEIs, governments, and other stakeholder organisations;
- its operational independence: the definition and operation of the agency’s procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as HEIs, governments, and other stakeholders;
- the independence of any formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Through the external review process, ENQA members have been able to demonstrate sufficient levels of independence and integrity. In the future, all EHEA member governments should remain vigilant so as to keep enabling the conditions to ensure that QA agencies work with the proper levels of independence and autonomy. Where this is not yet the case, national governments should enable the establishment of independent QA agencies, constituted to be able to operate in line with the ESG.
ENQA recommends all EHEA member governments to carefully consider the requirements of the jointly adopted revised European framework for quality assurance – the revised ESG and the European Approach for the Quality Assurance of Joint Programmes - and ensure that any national laws or regulations making their implementation impossible or difficult for the QA agencies or HEIs be removed with urgency.

ENQA urges all EHEA member governments to remain vigilant of the potential effects of the development of an unregulated, cross-border quality assurance services market. Related risks should be carefully analysed and possible corrective or regulatory measures considered.

ENQA recommends that all EHEA member governments contribute to the development of guidelines of good practice for cross-border quality assurance activities and commit to their use by all QA agencies to ensure that the internationalisation of quality assurance has the positive effects it is intended to have and to minimise the associated risks.

ENQA exhorts all EHEA member governments to remove any remaining restrictions which may exist at the national level that prohibit the publication of full reports by expert panels. It is a requirement of the revised ESG - and a logical consequence if the transparency tool function of quality assurance is taken seriously - that all reports should be published and accessible to all interested stakeholders.

ENQA urges all EHEA member governments to create and safeguard the necessary conditions that enable QA agencies to work with the proper levels of independence and autonomy, and where this is not yet the case, proceed with the establishment of independent QA agencies which are able to operate in line with the ESG.