# IMINQA - Peer Learning Activity 2

## 21 MARCH 2023

# Preparatory Analysis[1]: Cross-Border Quality Assurance and Quality Assurance of Transnational Education

## Intro

The current thematic preparatory note is intended to support the discussion of the Peer Learning Activity on cross-border quality assurance (QA) and on the QA of transnational education organised as part of the IMINQA Project.

The analysis maps the state of play of countries' legal frameworks and their openness to recognising external QA of foreign EQAR-registered QA agencies, giving a first insight into the rationale and challenges of cross-border QA. The analysis reflects on key issues that need to be assured by the national system for the outgoing transnational education.

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[1] Preparatory analysis prepared by Melinda Szabó & Blazhe Todorovski (EQAR) and edited by IMINQA Project partners

![I'MINQA logo]

With the support of the
Erasmus+ Programme
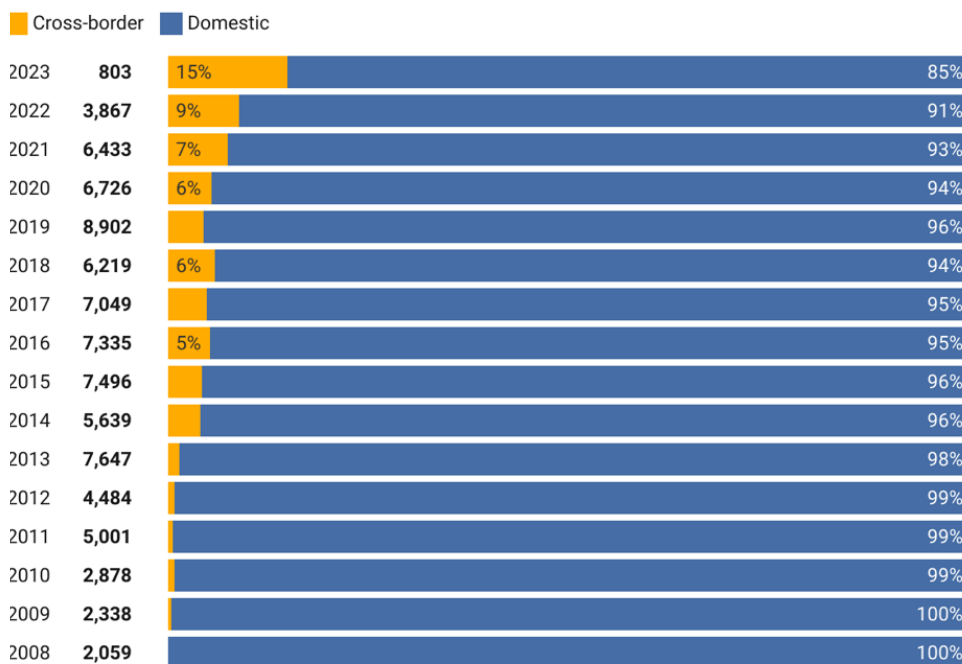of the European Union

The analysis builds upon EQAR's Knowledge Base[2] (and further national legislation) on legal frameworks on quality assurance, the data collected as part of the Database of External Quality Assurance Results (DEQAR, statistical data as of 15 March 2023[3]) and Key considerations for cross-border QA, EQAR's Policy Paper on CBQA (2020), RIQAA project report (2014), UNESCO-OECD guidelines for quality provision in cross-border higher education (2022).

## Status and Recognition of Cross-Border external QA

The ESGs are a common basic framework for quality assurance in the European Higher Education Area (EHEA) since 2005 and are acknowledged as a suitable basis for work across borders. The picture of external QA activities within the scope of the ESG is highly diverse, illustrating that the ESGs have been adapted successfully to the various specificities of higher education systems.

The EHEA ministerial Communiqués of Berlin (2003), Bucharest (2012), Yerevan (2015) and Paris (2018) have recognised higher education institutions' responsibility for assuring the quality of education and their right to choose an EQAR-registered quality assurance agency for their compulsory external quality assurance.
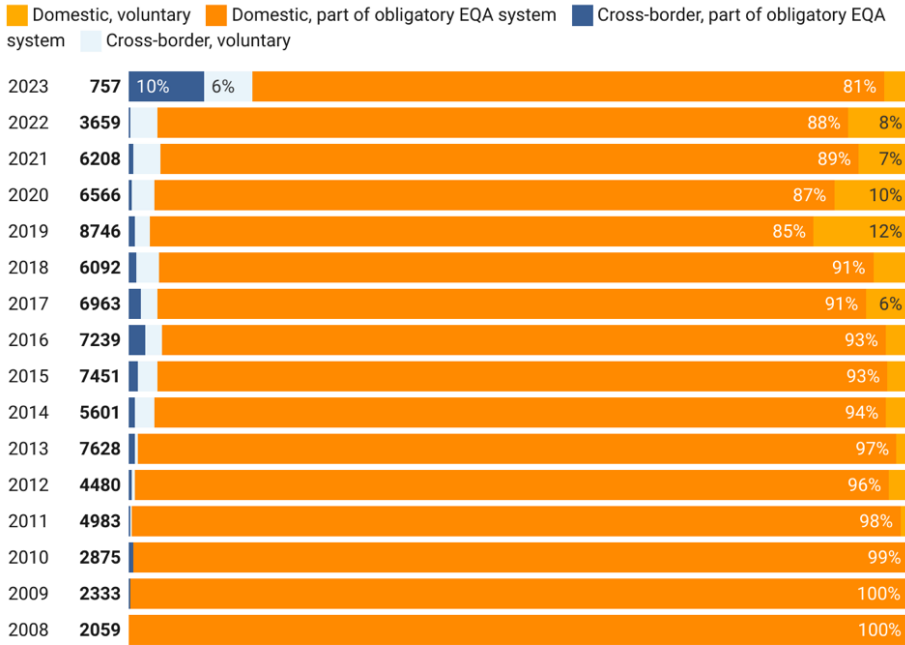
*Figure 1. Share of cross-border external QA results in DEQAR by year (March 2023)*



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2   https://www.eqar.eu/kb/country-information/
3   https://www.eqar.eu/qa-results/search/

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*Figure 2. Share of cross-border QA in DEQAR by year (EHEA institutions only)*

Legend:
- Domestic, voluntary
- Domestic, part of obligatory EQA system
- Cross-border, part of obligatory EQA system
- Cross-border, voluntary

| Year | Count | Cross-border, part of obligatory EQA | Cross-border, voluntary | Domestic, part of obligatory EQA system | Domestic, voluntary |
|------|-------|------|------|------|------|
| 2023 | 757 | 10% | 6% | 81% | |
| 2022 | 3659 | | | 88% | 8% |
| 2021 | 6208 | | | 89% | 7% |
| 2020 | 6566 | | | 87% | 10% |
| 2019 | 8746 | | | 85% | 12% |
| 2018 | 6092 | | | 91% | |
| 2017 | 6963 | | | 91% | 6% |
| 2016 | 7239 | | | 93% | |
| 2015 | 7451 | | | 93% | |
| 2014 | 5601 | | | 94% | |
| 2013 | 7628 | | | 97% | |
| 2012 | 4480 | | | 96% | |
| 2011 | 4983 | | | 98% | |
| 2010 | 2875 | | | 99% | |
| 2009 | 2333 | | | 100% | |
| 2008 | 2059 | | | 100% | |

DEQAR data shows that there has been a constant increase in the share of cross-border external QA activities carried out in the past 10 years (see Fig 1) including in the years of the pandemic. Progress has been nevertheless slow in 'opening' the legal framework of national external QA systems in EHEA (see Map 1) and in recognising the reviews of EQAR-registered agencies (see also Fig. 2).
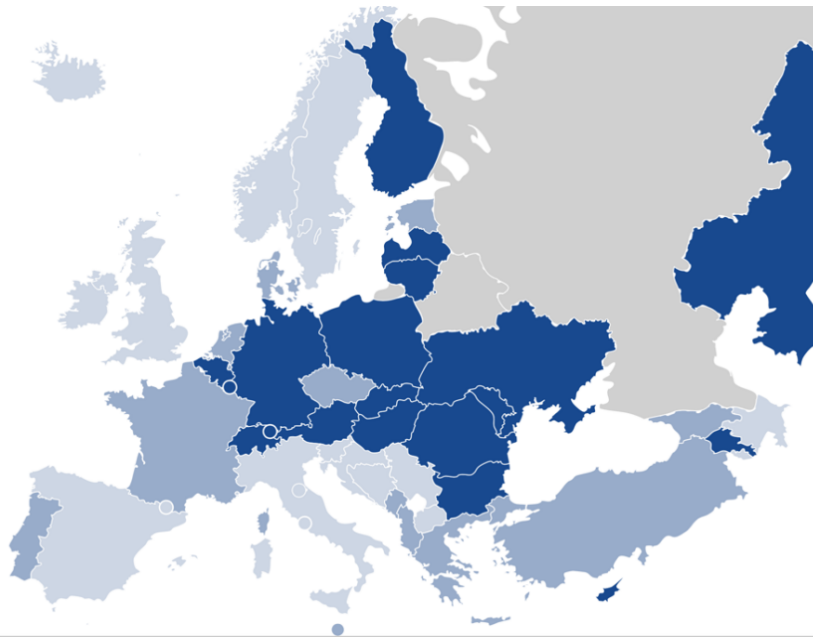


Map 1. System openness to cross-border quality assurance (March 2023)

While 91% of all EHEA signatories (43 of 47 countries) have experienced a form of cross-border QA with an EQAR-registered agency, currently only 22 of the 47 signatory EHEA countries (see Map 1) have in place legal provisions to allow some or all higher education institutions to be accredited, evaluated or audited by a suitable

EQAR-registered agency (other than the national QA agency) for their compulsory external QA.

While EQAR registration is generally the main condition for an external QA agency to be deemed as eligible by national authorities (as it proves trust and alignment with the ESG), the 'openness of legal frameworks to cross-border QA' often comes with additional conditions or criteria.

The additional requirements for quality assurance agencies to operate in another country, may range from sensible approaches e.g., cross-border QA activity has to match the profile of the national QA agency; the higher education institution has to inform the national QA body of its submission for a cross-border accreditation. In other cases, countries may have in place limiting constrains although the agencies have demonstrated their legitimacy and trust through a successful external review against the ESG i.e., multiple additional checks ranging from meeting the eligibility requirements for QA agencies to operate, coupled with specific requirements on the use of national standards and criteria as well as further post recognition procedures on accepting the results of the cross-border QA activity.

The current requirements and conditions for agencies' work across borders (see EQAR's knowledge base)[4] can be grouped into 1) eligibility requirements, 2) system level limitations, 3) conditions for the work of the agency within the country, and 4) specific stipulations for the recognition of cross-border reviews.

1. **Eligibility requirements**. Before an external QA activity is initiated, some countries may require that the foreign QA agency is approved by a competent national body e.g., ministry or national QA agency; the foreign QA agency may need to agree on the terms and conditions of the review with the national agency; the foreign agency may be also required to demonstrate certain expertise in the field of external QA.

2. **Conditions for the agency's work**. In carrying out the external QA review, the foreign QA agency may have to use the regulations and frameworks of the national higher education system to prepare procedures and/or carry out the QA activity in the language of the higher education system; to adapt their standards, and criteria for decision making (such as the evaluation scale) to specific national requirements; to ensure the use of certain type of experts and observers in their review etc.

3. **System level limitations**. The review is in some cases constrained to certain higher education institutions or programmes, e.g., HEIs/programmes can be reviewed by a foreign EQAR-registered agency only if they have already passed an initial accreditation, or the review can only be carried out at public higher education institutions but not for universities of applied sciences.

4. **Recognition of reviews**: After the external QA procedure is completed, the review has to pass the approval of a competent national body or the national QA agency. The decision on the review will be taken only if the review is approved.

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[4] https://www.eqar.eu/kb/country-information/

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## Higher Education Institutions' Experience with a Cross-Border QA

The approach to quality assurance of QA agencies can shape the internal processes of institutions differently. The case-study interviews of higher education institutions (RIQAA project report, 2014[5]) showed that the main reasoning for a higher education institution to undergo cross-border external QA with an EQAR-registered QA agency was to enhance their reputation, increase the employability of their graduates, and develop their own internal quality culture. The higher education institutions considered that the external expertise on specific issues could help consolidate the institutional development goals, provide an assessment on less developed areas of the university, or enhance certain aspects that are not addressed as part of the national QA exercise.

Some higher education institutions chose to undertake an international accreditation to fulfil the educational standards for specific EU regulated professions e.g., the European Association of Establishments for Veterinary Education (EAEVE) review provides recognition for veterinary education establishments if they have achieved the EU minimum compulsory requirements for this profession.

Reviewed institutions appreciate such cross-border external evaluations as they provide a more genuine international experience, a different enhancement led approach to quality assurance; they help enhance the institution's profile internationally, strengthen internationalisation policies and development of institutions' collaboration with other foreign institutions and increase external acknowledgement of the institutions' efforts to improve. Small and regionally focused higher education institutions considered the recognition provided by an international accreditation body as a way of attracting more students not only from the national pool but also from abroad.

### Selection of a suitable QA agency

In selecting a foreign QA agency, institutions considered the international reputation, country of origin, expertise in a particular field, affordability etc). In some cases, no initial decision was taken to choose a foreign or a national QA agency, and both options were considered equally. The choice of a suitable agency usually involves considerable desk research for higher education institutions. Higher education institutions refer to the information provided on the EQAR website, the portfolios of international activities and the presentation of QA agencies' procedures and cross-border review policies.

### Further question for discussions:

- What other reasons are there for choosing a foreign EQAR-registered QA agency?

- What are the obstacles/challenges for institutions when engaging in a cross-border QA?

- What are the national conditions and specific requirements for the work of EQAR-registered QA agencies that may be considered reasonable and useful?

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[5] https://www.eqar.eu/assets/uploads/2018/04/WP5_RIQAA_Report_final.pdf

- Which are national conditions and specific requirements for the work of EQAR-registered QA agencies that may be obsolete and undermine the commitments to allow for cross-border QA?

- To what extent is the legal framework supporting or impeding the choice of HEIs to choose a suitable EQAR-registered QA agency?

## Overview of Cross-border QA Activities

EQAR's annual update (2015-2019)[6] on registered QA agencies' activities shows that two thirds of QA agencies have carried out at least one cross-border external QA procedure, while almost half of EQAR-registered agencies carry out cross-border external QA on a regular basis.

Considering the use of a cross border external QA procedure, currently (March 2023) 18% of the 3481 higher education institutions included in DEQAR had been reviewed by an EQAR-register QA agency at programme or institutional level. The majority of cross-border review reports (90%) are carried out at programme level, while institutional level reviews (8%) and joint programme reviews (2%) represent a smaller share of these procedures. Considering the spread of cross-border QA activities, EQAR-registered agencies have conducted reviews in 91 countries around the World, out of which 44 EHEA systems (see Figure 3).

DEQAR data further shows that most cross-border QA procedures (83%, representing 2524 external QA activities) are carried out as voluntary/add-on activities, while mandatory external QA procedures represent only 17% of such reviews. When looking only at the EHEA, the share of reviews that have been carried out as part of the mandatory external QA exercise is somewhat higher, with 28% of cross-border external QA reviews being recognised as part of the mandatory external QA within 26 (of 47) HE systems.

EQAR-registered agencies (see full list of agencies in Annex 1) have reviewed 210 higher education institutions at programme or institutional level from outside the EHEA (in 57 countries and territories). These activities represent 35% of the total share of external QA activities of EQAR-registered agencies (contributing to DEQAR).

Considering the results of an external QA review, DEQAR data shows that cross-border reviews generally have more positive overall decision (69% vs. 53% for domestic reviews), and less positive decisions with conditions (22% vs. 32% for domestic reviews) but the same share of negative decision (0.95% vs. 0.85% for domestic reviews) (see Figure 4). Most the differences can be explained by the nature of cross-border reviews, that often serve as an add-on to the mandatory external QA.

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[6] https://www.eqar.eu/kb/external-qa-activities/#annual-updates-on-the-external-qa-activities-of-eqar-registered-agencies
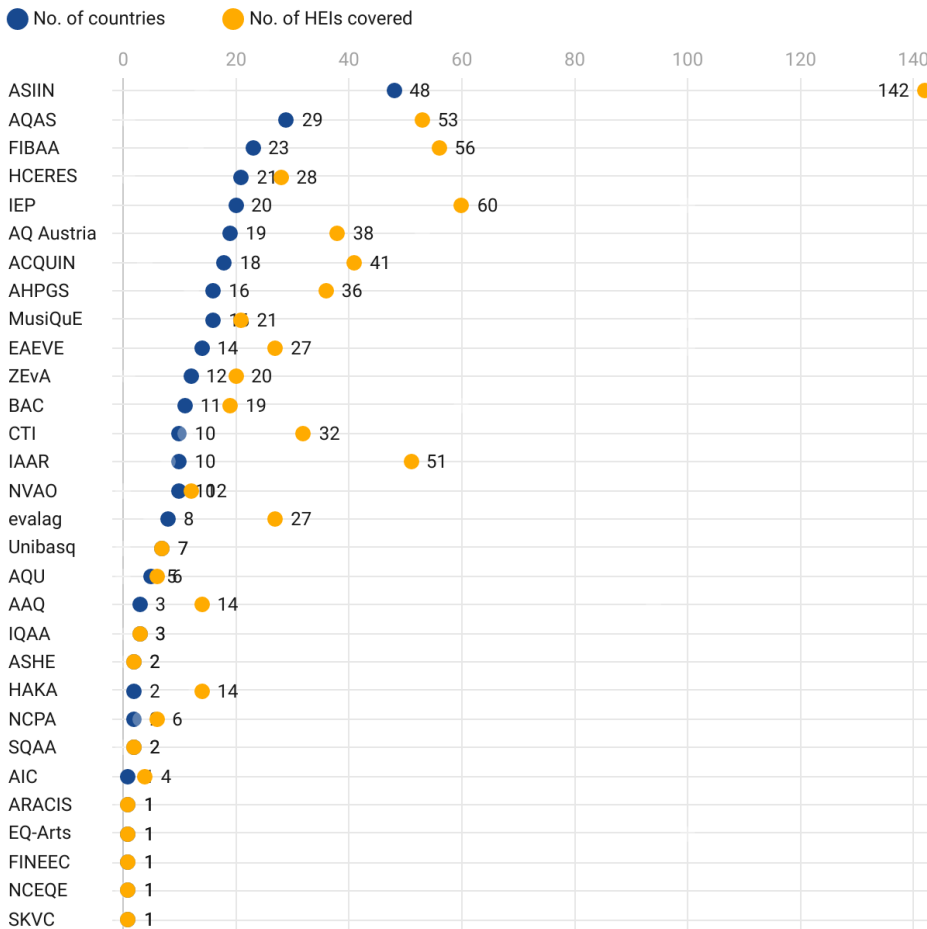
*Figure 3. Cross-border external QA by no. of countries and HE institutions (DEQAR data, 2023)*

## External QA Decisions

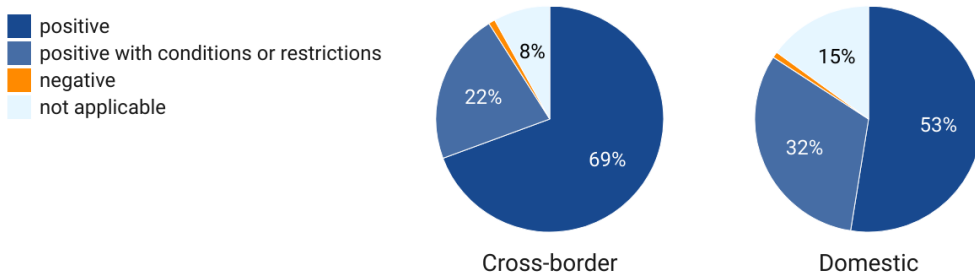Decisions by cross-border vs domestic external quality assurance reports



*Figure 4. Decisions by cross-border vs domestic external QA in DEQAR (March 2023)*

**Further question for discussions:**

- How are foreign QA agencies ensuring that cross-border QA is beneficial to the local QA and HEI systems?

- What are the challenges/obstacles QA agencies are facing in carrying out cross-border QA?

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- What are the good and bad practices in the agencies work across-borders?

## Quality Assurance of Transnational Education (TNE)

Transnational education or cross-border higher education (CBHE)[7] refers to any learning activity in which the students are based in a different country from the country in which the institution providing the education is located.

In their Ministerial Conference in Rome (2020), the EHEA members committed to ensuring that external quality assurance arrangements cover transnational higher education with equal standards to those used for domestic provision.

When considering cross-border higher education, a clear distinction needs to be drawn between the roles and responsibilities of exporting countries and importing countries. Exporting countries are the source of higher education and programmes delivered in another country (the importing countries) (UNESCO APQN, 2006). The main responsibility for quality assurances of TNE lies with the exporting country and provider. Exporting transnational education providers are expected to maintain and ensure the same level of quality of the academic programmes they offer abroad as at home.

The use of the ESG in the evaluation of transnational higher education is an important part of an exporting HE system to guarantee their quality, legitimise the educational services offered by cross-border providers and the validity of the awarded qualifications in the labour market. This is important to help reduce the risk of activities of bogus providers in the receiving countries (UNESCO, 2011).

Having to be reviewed by both the exporting and importing country's QA agency is often a burden on cross-border providers, which may have to duplicate efforts in preparing self-evaluation documents, submitting supporting evidence, hosting two different visits, and following up two review reports.

TNE provision includes branch campuses overseas, collaborative partnerships in the form of joint-programmes, validation or franchising arrangements, and distance learning provision, but excludes international student mobility. The last decade has seen a steady increase in the number of new TNE programmes being offered and in new forms of delivery ((Jane Knight and John McNamara, 2017[8], that may pose additional challenges to current forms of external QA. The emerging modes of delivery include new forms of partnerships, blended distance education, reduce frequency, the development of internationally co-founded and joint institutions, the development of new private independent universities in a host country which primarily offer franchised academic programmes from different foreign providers etc. These new approaches may however raise questions on whether the qualifications are recognised by the HE sectors in the importing country, or abroad.

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[7] Definition offered by the Quality Assurance of Cross-Border Higher Education project (2015) https://www.enqa.eu/wp-content/uploads/2015/11/QACHE-toolkit.pdf
[8] https://www.britishcouncil.org/sites/default/files/tne_classification_framework-final.pdf

The OrgReg[9] and DEQAR databases show that at least 30 higher education institutions from 17 different EHEA systems have TNE provision in different higher education systems. Some TNE provisions are offered only in one campus abroad e.g., Fjellhaug International University College (Norway) offers studies in its campus in Copenhagen (Denmark) or the Estonian Business School (Estonia) offering studies in its campus in Helsinki (Finland). Some others may be offered across many higher education systems e.g., Technical University of Munich (Germany) has TNE provision in Mumbai (India), São Paulo (Brazil), Cairo (Egypt), Beijing (People's Republic of China) and San Francisco (United States) (see Annex 2).

Having to be reviewed by both the home and host country's agency is often a burden on cross-border providers, which may have to duplicate efforts in preparing self-evaluation documents, submitting supporting evidence, hosting two different visits, and following up two review reports. Countries should lessen the burden on cross-border providers and making more efficient use of their own resources.

A mapping of national QA frameworks of TNE within the EHEA reveals that several countries have provision in place to ensure that the national QA requirements are applied no matter whether the educational offer is taking place abroad or within the exporting HE system:

**Germany**: The German accreditation requirements are applied to all study programmes in which a German HE institution awards a degree, no matter if the programme is carried out in Germany or abroad.

**France**: QA of transnational higher education is included in the mandate of the national QA agencies CTI and HCERES. In reviewing the QA of TNE provision, CTI employs the same ESG-aligned standards as for domestic provisions.

**Croatia**: If Croatian HE institutions provide, HE programs in other countries, they should comply with the national standards to issue recognised Croatian HE qualifications.

**Ireland**: Self-accrediting HEIs ("designated awarding bodies" in national legislation) may accredit programmes offered in branch campuses or under joint provision agreements outside Ireland. Other HEIs must seek accreditation from the national QA agency for such programmes.

**Romania**: A foreign higher education institution planning to deliver a Romanian HE diploma should pass through the same accreditation procedures as national HEI. If the diploma is of the country of origin and the HEI is accredited in the home country, no procedures are needed.

**Cyprus**: According to the existing legislation, the Cyprus QA agency, may accept the evaluation of an institution operating in the Republic of Cyprus by other external bodies or external agencies or overseas evaluation organisations, provided that: (a) the external evaluation body is listed in EQAR, and (b) the institution concerned has obtained the prior consent of the CYQAA for the selection of the specific external evaluation body for that purpose.

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[9] OrgReg is a public facility, which provides a comprehensive register of public-sector research and higher education organizations in European countries. https://www.risis2.eu/registers-orgreg/

**Luxembourg**: There is no TNE offer in Luxembourg (or from Luxembourg but offered abroad). The accreditation procedure does foresee a joint accreditation of both programmes and institutions, which would mean that institutions abroad would have to get accredited according to Luxembourg standards, for the given programme.

**Further question for discussions:**

- How is the national system assuring the quality of its exporting TNE?

- How are QA agencies addressing TNE in their regular external QA of the (exporting) higher education institution?

- Are there differences within the QA systems approaches for HE provisions abroad vs. at home? If yes, what are these differences and what are the reasons for these differences?

- How are QA agencies ensuring the same level of quality provisions abroad vs at home? How are QA agencies avoiding the risk of QA being less stringent for provision abroad?

## Annex 1. List of EQAR-registered agencies that carry out reviews across borders (March 2023)

| Acronym | Full name of the agency | Country based in |
|---------|------------------------|------------------|
| ASIIN | The Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics (ASIIN e.V.) | Germany |
| AQAS | Agency for Quality Assurance through Accreditation of Study Programmes | Germany |
| FIBAA | Foundation for International Business Administration Accreditation | Germany |
| HCERES | High Council for Evaluation of Research and Higher Education | France |
| IEP* | Institutional Evaluation Programme | Switzerland |
| AQ Austria | Agency for Quality Assurance and Accreditation | Austria |
| ACQUIN | Accreditation, Certification and Quality Assurance Institute | Germany |
| AHPGS | Accreditation Agency in Health and Social Sciences | Germany |
| MusiQuE* | Music Quality Enhancement | Belgium |
| EAEVE* | European Association of Establishments for Veterinary Education | Austria |
| ZEvA | Central Evaluation and Accreditation Agency | Germany |
| BAC | British Accreditation Council for Independent Further and Higher Education | Great Britain |
| CTI | Engineering Degree Commission | France |
| IAAR | Independent Agency for Accreditation and Rating | Kazakhstan |
| NVAO | Accreditation Organisation of the Netherlands and Flanders | Netherlands |
| evalag | Evaluation Agency Baden-Württemberg | Germany |
| Unibasq | Agency for Quality of the Basque University System | Spain |
| AQU | Catalan University Quality Assurance Agency | Spain |
| AAQ | Swiss Agency of Accreditation and Quality Assurance | Switzerland |
| IQAA | Independent Agency for Quality Assurance in Education | Kazakhstan |
| ASHE | Agency for Science and Higher Education | Croatia |
| HAKA | Estonian Quality Agency for Education | Estonia |
| NCPA | National Centre for Public Accreditation – currently suspended entry | Russia |
| SQAA | Slovenian Quality Assurance Agency | Slovenia |

| | | |
|---|---|---|
| AIC | Academic Information Centre | Latvia |
| ARACIS | Romanian Agency for Quality Assurance in Higher Education | Romania |
| EQ-Arts* | Enhancing Quality in the Arts | Netherlands |
| FINEEC | Finnish Education Evaluation Centre | Finland |
| NCEQE | National Center for Educational Quality Enhancement | Georgia |
| SKVC | Centre for Quality Assessment in Higher Education | Lithuania |

* QA Agencies that have an international focus in their external QA assurance activities.

## Annex 2. List of higher education institutions in DEQAR that have branch campuses outside the country with their legal seat.

DEQARINST1320 Central European University (Hungary):
TNE locations at:
- Vienna, Austria

DEQARINST5773 College of Europe (Belgium (Flemish Community))
TNE locations at:
- Warsaw, Poland

DEQARINST1077 Conservatoire national des arts et métiers (France) - reports in DEQAR:
TNE locations at:
- Beyrouth, Lebanon

DEQARINST2343 DOBA Business School (Slovenia):
TNE locations at:
- Belgrade, Serbia

DEQARINST2211 "Dunarea de Jos" University of Galati (Romania)
TNE locations at:
- Chişinău, Moldova
- Comrat, Moldova
- Cahul, Moldova
- Enna, Italy

DEQARINST0982 École supérieure d'électronique de l'Ouest (France)
TNE locations at:
- Shanghai Shi, China, People's Republic of

DEQARINST0752 Estonian Business School (Estonia)
TNE locations at:
- Helsinki, Finland

DEQARINST0197 Federal Institute of Technology Lausanne (Switzerland)
TNE locations at:
- Ras al-Khaimah, United Arab Emirates

DEQARINST7074 Fjellhaug International University College (Norway)
TNE locations at:
- København, Denmark

DEQARINST0575 Fresenius University Applied Sciences (Germany)
TNE locations at:
- New York, United States

DEQARINST2733 Glasgow
Caledonian University (United
Kingdom (Scotland))
TNE locations at:
- London, United Kingdom
(England)

DEQARINST2735 Heriot-Watt
University (United Kingdom
(Scotland))
TNE locations at:
- Putrajaya, Malaysia
- Dubai, United Arab Emirates

DEQARINST6728 Istituto Europeo
di Design (Italy)
TNE locations at:
- Rio De Janeiro, Brazil
- Madrid, Spain
- Barcelona, Spain
- São Paulo, Brazil

DEQARINST2676 Middlesex
University (United Kingdom
(England))
TNE locations at:
- Prembroke, Malta
- Flic en Flac, Mauritius
- Dubai, United Arab Emirates

DEQARINST0031 MODUL
University Vienna (Austria)
TNE locations at:
- Dubai, United Arab Emirates

DEQARINST1084 National museum
of natural history (France)
TNE locations at:
- Par Bouko, Central African
Republic

DEQARINST0025 Paracelsus
Medical University (Austria)
TNE locations at:
- Nuremberg, Germany

DEQARINST0826 San Antonio
Catholic University of Murcia
(Spain)

TNE locations at:
- Dubai, United Arab Emirates
- Jakarta, Indonesia

DEQARINST7231 Schiller
International University
(Germany)
TNE locations at:
- Madrid, Spain
- Paris, France
- Tampa, United States

DEQARINST0030 Sigmund Freud
Private University Vienna
(Austria)
TNE locations at:
- Milano, Italy
- Ljubljana, Slovenia
- Paris, France
- Berlin, Germany

DEQARINST0336 Technical
University of Munich
(Germany)
TNE locations at:
- Mumbai, India
- São Paulo, Brazil
- Cairo, Egypt
- Beijing, China, People's Republic
of
- Singapore, Singapore
- San Francisco, United States

DEQARINST2741 The University of
Stirling (United Kingdom
(Scotland))
TNE locations at:
- London, United Kingdom
(England)

DEQARINST2744 The University of
the West of Scotland (United
Kingdom (Scotland))
TNE locations at:
- London, United Kingdom
(England)

DEQARINST0110 Transnational University Limburg (Belgium (Flemish Community))
TNE locations at:
- Hasselt, Netherlands
- Maastricht, Netherlands

DEQARINST1672 Transport and Telecommunication Institute (Latvia)
TNE locations at:
- Gurgoan, India

DEQARINST0726 University College of Northern Denmark (Denmark)
TNE locations at:
- Ho Chi Minh City, Vietnam

DEQARINST2682 University of Nottingham (United Kingdom (England))
TNE locations at:
- Semenyih, Malaysia
- Ningbo Shi, China, People's Republic of

DEQARINST2339 University of Nova Gorica (Slovenia)
TNE locations at:
- Venezia, Italy
- Gorizia, Italy

DEQARINST0715 University of Southern Denmark (Denmark)
TNE locations at:
- Flensburg, Germany

DEQARINST0930 University of Toulouse II - Jean Jaurès (France)
TNE locations at:
- Madrid, Spain

DEQARINST2746 University of Ulster (United Kingdom (Northern Ireland))
TNE locations at:
- London, United Kingdom (England)
- Birmingham, United Kingdom (England)