Policy brief: the EHEA's agreed QA policies

Cross-cutting analysis of thematic papers

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Introduction

IMINQA is an overarching project supporting the BFUG Thematic Peer Group C on Quality Assurance (QA). The project is aimed at quality assurance issues in general, with a specific focus on key European Higher Education Area (EHEA) policy priorities, reflected in the Rome Communiqué (2020), to further develop quality assurance systems by removing existing barriers.[1]

Quality assurance in higher education has been a key commitment of the EHEA since the Bologna Declaration in 1999. The Bologna Declaration has emphasised the importance of European cooperation in quality assurance as a crucial part of creating the EHEA[2]. Since then, quality assurance has been constantly prioritised as a key commitment in ministerial communiqués and policy documents within the Bologna Process.

During the Ministerial Conference in Rome in 2020[3], the progress towards aligning systems with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) was acknowledged, and the importance of continuing the work "to remove the remaining obstacles" was underlined, with a special focus on the implementation of cross-border external evaluations of EQAR-registered agencies, and the European Approach for Quality Assurance of Joint Programmes. Additionally, the commitment of external quality assurance to "cover transnational higher education in the EHEA with equal standards as for domestic provision" was highlighted.

Based on these key themes and the needs of many EHEA countries, three Peer Learning Activities (PLA) were organised. PLAs were concentrated on specific EHEA policy priorities, delving into the following topics:

- Alignment of the legal framework with the ESG – discussing and reflecting on crucial external and internal QA issues. This includes reflections on obstacles to complying with the ESG.[4]
- Cross-Border Quality Assurance and Quality Assurance of Transnational Education – discussing the challenges and benefits of cross-border QA and transnational education, as well as their compliance with countries' legal frameworks.[5]

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[1]IMINQA project https://www.eqar.eu/about/projects/iminqa/

[2]Full text of Bologna Declaration at
https://ehea.info/media.ehea.info/file/Ministerial_conferences/02/8/1999_Bologna_Declaration_English_553028.pdf

[3]Rome Ministerial Communiqué (2020), full text at
https://ehea.info/Upload/Rome_Ministerial_Communique.pdf

[4] Alignment of the legal framework with the ESG. Full paper at
https://www.eqar.eu/assets/uploads/2024/11/ThematicAnalysis_PLA1_EQA-update-17-05.pdf

- European Approach for Quality Assurance of Joint Programmes[6] – discussing compliance with countries' legal frameworks and perspectives of higher education institutions.

To support discussions, facilitate the peer exchange, and offer an empirical substantiation, three papers on these topics were written. The thematic papers addressed the aforementioned concerns and supported the PLA discussions.

The aim of this document is to develop a cross-cutting analysis in order to explore these thematic papers, identify common themes, and draw overarching conclusions.

To achieve this, a tool for qualitative analysis weas employed. Through systematic coding in MAXQDA, a software tool for qualitative and mixed-methods data analysis, cross-cutting topics were identified across the three PLA papers. The analysis focused on recurring patterns and connections among the themes for understanding and highlighting encompassing topics.

Thematic analyses

This chapter provides a summary of the PLA thematic papers and presents central insights from discussions and analysed data.

Aligning the legal frameworks with the ESG

This thematic analysis was prepared as part of the first PLA activity on "Aligning legal frameworks with the ESG" within the IMINQA project. The paper examines the evolving landscape of quality assurance in higher education, addressing the topics of: a) key issues and challenges related to implications of higher education legislation on internal and external quality assurance; b) barriers to ESG compliance at national level, and c) the status/role of external QA in different higher education systems.

The paper demonstrates that, despite clear progress over the last three decades in the EHEA towards implementing QA policies in line with ministerial key commitments[7], this progress is not uniformly achieved across the area. Out of the 51 EHEA systems, 35 are fully aligned with the ESG, eight systems are partially aligned, and eight systems are not aligned at all (December 2024[8]). While many systems made significant advances in establishing comprehensive internal and external QA frameworks, some still struggle to fully align with the ESG.

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[5] Cross-Border Quality Assurance and Quality Assurance of Transnational Education. Full paper at https://www.eqar.eu/assets/uploads/2024/11/ThematicAnalysis_PLA2_IMINQA_30-06.pdf

[6] European Approach for Quality Assurance of Joint Programmes. Full paper at https://www.eqar.eu/assets/uploads/2024/11/ThematicAnalysis_PLA3_1.pdf

[7]More in Tirana Communiqué https://ehea.info/Immagini/Tirana-Communique.pdf

[8]EQAR's knowledge base https://www.eqar.eu/kb/country-information/

The issues in internal and external QA are also interlinked and are often determined and impacted by the national framework.

The analysis shows, that while QA agencies are responsible for demonstrating compliance with the ESG standards, higher education policies and legislative frameworks can create barriers that hinder their ability to align with these standards. Between 2005 and 2022, 14% of applications for initial registration on EQAR were rejected primarily because of issues beyond the remit of the agency, i.e. regulated by the systems they operate in. Issues vary in different systems, but some of the factors encountered most often were: the agencies' limited involvement in the design of external QA methodology, restricted engagement of students in external QA and governance, restricted transparency of review outcomes, and the lack of independence.

When it comes to internal QA, its fundamental principle is that institutions take responsibility for quality assurance and enhancement of their educational provision and develop QA systems tailored to their needs. However, internal QA processes are often instead introduced to answer requirements of external QA, which is partly an influence of political and policy decisions made at national level.

The paper also demonstrates that over time, the scope of QA agencies has expanded, and that their activities have become more diversified, leading to the development and enhancement of their external QA mechanisms. Principal aims are to avoid repetitiveness, and to make the system more efficient. Some of the agencies have also extended their work beyond traditional higher education and added activities outside the scope of the ESG. Over a third of EQAR-registered agencies also offer consultancy and or training services, which are expected to be separated from their standard external QA processes. However, this distinction is not always clear, potentially leading to (apparent) conflicts of interests. If the two types of activities are not adequately separated, this lack of clarity could mislead the public regarding the nature of the status of the activity.

Cross-Border Quality Assurance and Quality Assurance of Transnational Education

This thematic analysis was prepared as part of the second PLA activity on "Cross-Border Quality Assurance and Quality Assurance of Transnational Education" within the IMINQA project. The paper discusses the status quo of national legislative frameworks with regard to cross-border QA and the QA of cross-border higher education.

The paper demonstrates that while the Berlin (2003), Bucharest (2012), Yerevan (2015), and Paris (2018) communiqués have endorsed the right of higher education institutions to choose the most suitable EQAR-registered agency for their compulsory external QA, the agencies

still face various obstacles when conducting cross-border evaluations across the EHEA countries.

EQAR-registered agencies often face additional requirements for their assessments to be recognised equally to national agencies. These requirements vary across systems, from restrictions to add-on requirements, creating a rather complex landscape. Only 20 of the EHEA higher education systems have legal provisions in place to allow some or all higher education institutions to be externally evaluated by an EQAR-registered QA agency (other than the national or regional agency of the institution in question) (December 2024[9]). Revision of legal frameworks to accommodate the cross-border needs is very slow, and throughout the years, some systems returned to more complicated arrangements. However, there are factors pointing to a high demand, as institutions in 43 of the 47 EHEA countries have experiences with cross-border activities from an EQAR-registered agency, and 32 EQAR-registered agencies have conducted at least one cross-border QA procedure so far.

The thematic paper shows that EQAR-registered agencies willing to engage in cross-border activities should consider certain requirements and conditions that can be grouped in the following categories:

- Eligibility requirements – some QA systems may require foreign QA agencies to be approved by a relevant national authority, to have their review terms agreed by the national agency, and/or to demonstrate specific expertise in external QA.

- System-level limitations - HEIs/programmes can be reviewed by a foreign EQAR-registered agency only after they have been through an initial national/regional accreditation, or reviews cannot be carried out for universities of applied sciences.

- Conditions for the work of the agency within the country - a foreign QA agency may need to align with national regulations, conduct procedures in the local language, adapt standards to national requirements, and include specific experts in the external review.

- Recognition of reviews – after the procedure, the review has to be approved by the national body or national QA agency.

EHEA signatories of the Ministerial Conference in Rome (2020) have also committed to ensure that external QA covers transnational higher education (TNE) with approach equal to domestic provisions. However, the wide variety of TNE offerings and the absence of a clear definition make it challenging for QA agencies.

European Approach for Quality Assurance of Joint Programmes

This thematic analysis was prepared as part of the third PLA activity on the "European Approach for Quality Assurance of Joint Programmes" within the IMINQA project. The provision for the European Approach was adopted in 2015 and comprises two main elements:

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[9]EQAR's knowledge base https://www.eqar.eu/kb/cross-border-qa/mapping-system-openness-to-cbqa/

a) a set of standards aligned with the ESG and incorporating the Qualifications Framework (QF-EHEA) and the European Credit Transfer and Accumulation System (ECTS) and b) a procedure that can be used by EQAR-registered agencies for programme accreditation.[10]

Despite the introduction of the European Approach in 2015, the number of external QA procedures using this approach remains relatively low. Only 21 out of the 51 EHEA higher education systems have fully adopted the European Approach, and it is mostly used in those systems. In 14 EHEA systems it is available to some higher education institutions or only under specific conditions, while in 16 EHEA systems it is not available at all (December 2024)[11].

Adopting the European Approach at the national level can be challenging, and the implementation can be impacted by various factors. On a systematic and institutional level restrictions are linked to varying QA cycle lengths, misaligned qualifications across education systems, language requirements for compliance, unclear guidelines for the external QA procedures, and differing definitions and purposes of joint programs. On the other hand, QA agencies highlighted the need for reliable information about partner institutions' higher education systems, conflicting criteria and timelines among national quality assurance systems, difficulties in balancing accountability and enhancement-focused QA approaches, and restrictions on publicly funded agency staff conducting activities outside their national QA framework.

The paper shows that when institutions choose a QA agency for joint programme reviews using the European Approach, they prefer agencies based in one of the countries involved in the programme consortium. There are also several other factors that can positively influence the readiness of QA agencies to evaluate and accredit joint programmes, including: a) flexibility in higher education legislation and less bureaucratic challenges, allowing collaboration between HEIs and implementation of the European Approach, b) higher education legislation supporting cross-border quality assurance and c) competitiveness of quality assurance systems with multiple QA agencies. It was recognised that agencies that operate in such (competitive) systems are more inclined to explore and implement diverse methodologies.

Cross-cutting analysis

This section elaborates on comparable issues, synergies, and common themes identified across the three PLA thematic papers.

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[10] European Approach for QA of JoinT Programmes
    https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf

[11] EQAR's knowledge base https://www.eqar.eu/kb/joint-programmes/national-implementation/

Adaptive legislative framework, national regulations, and system-specific features

All three thematic papers outline the importance of flexibility in national regulations and legislative frameworks, making systems more receptive to implementing the EHEA commitments, keeping some aspects of QA within the remit of agencies themselves and engaging the agencies in the legislation-making process. Legal frameworks are expected to support the recognition of cross-border QA and the European Approach by default.

Despite the openly expressed political will, the Bologna Communiqués and promises to implement the necessary changes to fulfilling these commitments, there are still many barriers in the national legislation of numerous systems and/or additional requirements, that prevent this from happening.

Apart from adapting the legislative frameworks, it is also expected that the systems and agencies lift additional requirements, arising from national or institutional contexts, that increase complexity. Currently, 13 EHEA systems recognise cross-border external QA activities based on their frameworks/requirements, and in 13 EHEA systems the European Approach is available only to some higher education institutions or only under specific conditions[12]. This clearly shows that there is further room for improvement.

Apart from legislative frameworks and national regulations, other system level specificities can also hinder the overall success of cross-border QA and the European Approach. When conducting reviews across different systems, agencies are sometimes obliged to adapt their standards and methodologies to specific regulation or institutional rules of partner higher education institutions, which can be challenging.

Enhanced stakeholder involvement

The importance of stakeholder involvement is another common theme across thematic papers and is one of the major preconditions for achieving alignment with the ESG. Stakeholder involvement still remains an issue in the governance of some QA agencies and in a number of external QA activities. The exclusion of stakeholders from the development of the QA system, as well as their limited involvement in higher education and national legislation, significantly undermines the effectiveness of these initiatives and their alignment with the ESG.

To develop an effective quality assurance system, dialogue between all involved parties, including ministries, is crucial. It is also important for fostering a shared understanding of the core values, leading to long-term success. It has also been observed that the agencies that are less engaged in developing and revising the national framework, are more likely to have obstacles to being compliant with ESG Parts 2 and 3.

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[12] EQAR's knowledge base https://www.eqar.eu/kb/cross-border-qa/mapping-system-openness-to-cbqa/

With regard to ESG compliance, a lack of inclusion of student experts in reviews and stakeholders in the governance of QA agencies directly impacts ESG 2.4 *Peer review experts* and ESG 3.1 *Activities, policy and process for quality assurance.* The thematic paper on aligning the legal frameworks with the ESG suggests that this is "sometimes impeded due to certain requirements of professional experience (which may not be applicable to students) or existing regulations defining the composition of certain governance bodies".

This also hinders possibilities to conduct cross-border accreditations or reviews using the European Approach, since student engagement is a compulsory part for implementing both activities in line with the ESG.

Conditions for transnational activities

While Bologna Process signatories have made an important commitment to opening systems for transnational cooperation and activities in QA, the lack of trust and mutual recognition among QA agencies, institutions, and national systems burdens the effectiveness of cross-border QA. Distrust and scepticism of foreign QA agencies being able to understand the local context hinders successful implementation of cross-border accreditations and the use of the European Approach. The analysis shows a clear correlation between the system openness and the frequency of activities. Reviews using the European Approach are most often conducted in systems where the national framework automatically accepts the results of the European Approach evaluation.

Removing the additional requirements when it comes to the implementation of the European Approach therefore can considerably widen the system openness for transnational activities and answer to EHEA commitments.

Conclusions

The conclusion summarises the main points of PLA thematic papers and offers points for further discussion:

- Adherence to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) is still not achieved uniformly in the EHEA. While significant progress in establishing comprehensive internal and external QA frameworks in many systems is noted, some systems still struggle to achieve full alignment with the ESG.

- Existing limitations in national legislations can conflict with the ESG, making it difficult for some QA agencies and HEIs to comply with the ESG. Adaptive regulatory frameworks are important for solving this issue and for the seamless implementation of the European Approach and for cross-border QA activities across the EHEA.

- Engaging a wide range of stakeholders has a crucial impact on the development and sustainability of successful QA systems. Engaging students in peer review teams

(ESG2.4) and stakeholders in governance of the agencies (ESG3.1) remains a key area for improvement.

- System openness is an incentive for cross-border QA activities, but challenges in national legislations or additional system-level requirements are still an obstacle.

- Trust and mutual recognition among QA agencies, combined with lifting additional national requirements has a crucial role in the effectiveness of transnational QA activities.

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