

# Key Considerations for Cross-Border Quality Assurance in the European Higher Education Area



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## Introduction

The European Association for Quality Assurance in Higher Education (ENQA), European Students' Union (ESU), European University Association (EUA), European Association of Institutions in Higher Education (EURASHE) and European Quality Assurance Register for Higher Education (EQAR) were part of the stakeholder group drafting the Standards and guidelines for quality assurance in the European Higher Education Area (ESG)<sup>1</sup> and each organisation also works actively with their members to promote and further develop quality assurance (QA) whether at system or institutional level.

The development of the European Higher Education Area (EHEA) through the Bologna Process has contributed to an increase in cross-border exchanges and cooperation in higher education and facilitates the enhancement of trust and confidence among higher education systems. In the framework of the Bologna Process, cross-border QA is supported, and in the Yerevan Communiqué (2015) ministers in charge of higher education in the EHEA committed to allowing "higher education institutions to use a suitable EQAR registered agency for their external quality assurance process, respecting the national arrangements for the decision making on QA outcomes".

**In this context, cross-border QA refers to external QA activities of a QA agency carried out in a country other than the one in which it is based or primarily operates. For higher education institutions, this may be a**

<sup>1</sup> The ESG 2015 are a formal policy document of the EHEA, adopted and endorsed by ministers in charge of higher education.

**voluntary process or part of the national mandatory external QA.**

EQAR in particular has carried out work mapping experiences in cross-border QA through its RIQAA project (Recognising International Quality Assurance Activity in the European Higher Education Area).

### *Benefits of cross-border QA as identified by the RIQAA project*

*For higher education institutions, cross-border QA offers the possibility to*

- *identify an agency that best suits their own mission and profile, and which can in turn best meet their own needs*
- *strengthen the institutions' internationalisation policies and develop their collaboration with other foreign institutions*
- *help improve the recognition of their qualifications*
- *increase stakeholder engagement, strengthening the institutions' own responsibility for quality and the external acknowledgement of the institutions' efforts*

*For QA agencies, cross-border QA may provide*

- *a possibility to expand their national and international profile and gain prestige*
- *an increase in income*
- *learning opportunities to improve their own processes and methodologies*
- *the ability to promote continuous improvement within their specific field*

*Recognising International Quality Assurance Activity in the European Higher Education Area (RIQAA), Final Project Report, pages 28-29, 41-42*

One of the conclusions made by this project was that EQAR should invite stakeholder organisations to discuss possible recommendations for facilitating cross-border activities.

In response to this, ENQA, ESU, EUA, EURASHE and EQAR set up an ad-hoc working group to develop a document that would guide stakeholders engaging in cross-border QA. This document presents the results of the group's work, which has drawn on prior experience in the topic and consultations with various stakeholders. This document is not intended as a prescriptive manual for cross-border QA, but it aims to provide information and support to higher education institutions and QA agencies that engage in or consider engaging in cross-border QA activities within the EHEA. In doing so, it may also be a useful reference for governments to review and adapt their legal frameworks to allow for the use of cross-border QA with a suitable EQAR-registered agency for fulfilling requirements of national mandatory QA.

In this context, the authors emphasise that the ESG provide the foundation for all QA activities in the EHEA, including cross-border QA. The principles, standards and guidelines of the ESG are applicable to all forms of higher education and all EQAR-registered QA agencies. They should be observed in a way that makes sense in each context.<sup>2</sup>

While for some institutions and agencies cross-border QA

has become common practice, newly initiated procedures may present additional challenges especially in less familiar contexts. This document therefore draws attention to some key issues that should be taken into consideration to ensure the success of cross-border QA activities.

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<sup>2</sup> Further considerations for the specific case of joint programmes have been outlined in the European Approach for Quality Assurance of Joint Programmes.

## Roadmap for Cross-Border QA

This roadmap is presented in the format of guiding questions and key considerations to be taken into account in cross-border QA. The questions follow the chronological order of cross-border QA: section A addresses issues arising before cross-border QA is launched; section B refers to matters of the cross-border QA process itself; and section C considers the results of cross-border QA. However, it is stressed that all these points should be considered before engaging in cross-border QA.

### A. Engaging in cross-border QA

*What is the rationale for engaging in cross-border QA?*

An institution planning to engage in cross-border QA should thoroughly consider the aims of the process and the expected added-value. It should consider whether it will be part of the national mandatory QA or be in addition to an external QA procedure required in the national legal framework, and how this choice fits in its long-term QA strategy.

An agency should similarly consider and reflect on the aims and reasons for engaging in such exercises and whether they fit with its scope of activities.

*Which QA agency is fit for purpose for this specific case?*

The chosen agency should be EQAR-registered to ensure that it operates in accordance with the ESG.

The institution should look carefully at the philosophy and procedures of the chosen QA agency to ensure that they are appropriate for the institutional context, that they are

compatible with the aims and expected benefits of the process and that, if necessary, they meet any national legal requirements.

The agency should consider whether it is in a position to carry out the external QA requested by the higher education institution.

*What is the legal framework prescribing?*

The cross-border QA activity may be contingent on the national higher education framework and other specific national regulation. In case cross-border QA is part of the national mandatory QA, the institution and QA agency should consult and involve as appropriate national regulatory bodies (such as ministries or accreditation councils).

It is important that information about legal frameworks and national criteria is readily available and that both the institution and the QA agency inform themselves to ensure a proper understanding of the legal context.

*What other aspects (beyond the legal framework) need to be considered beforehand?*

While acknowledging the benefits that can result from cross-border QA, the institution should also consider aspects such as resources, public procurements procedures, language matters, as well as additional workload before committing to cross-border QA. Furthermore, the outcomes of cross-border QA may have an impact on the recognition of the institution's qualifications nationally and internationally.

Similarly, the QA agency would benefit from assessing its

expertise, capacity and resources to conduct cross-border QA while maintaining its professional standards and integrity.

*Has the institution communicated its decision to undergo cross-border QA to relevant stakeholders?*

The institution should properly communicate its decision to undergo cross-border QA and the reasons behind choosing a foreign agency to the institutional community, including students. The purpose and goals of the cross-border QA procedure should be clear for all involved. The full awareness and commitment of institutional stakeholders will support a meaningful cross-border QA process.

## **B. Carrying out cross-border QA**

*Will the agency need to modify its procedures because of the cross-border setting?*

When preparing to engage in cross-border QA, the agency should consider whether its procedures remain the same in a cross-border context. While the ESG provide a framework for all QA activities in the EHEA, they may be implemented in different ways in different contexts. Specific adaptations might be required based on the legal framework and the education system's traditions and structure. Any alterations to the agency's procedures should remain in line with the ESG and be made publicly available.<sup>3</sup>

If a joint programme is being reviewed, the agency and

institution should consider using the European Approach for Quality Assurance of Joint Programmes.

*What sort of preparations support successful cross-border QA?*

A preliminary meeting between the agency and the institution can help ensure a shared understanding of the national and institutional context and the forthcoming QA process.

The preparation would normally also include a formal agreement outlining i.a. the aims of the procedure and responsibilities of all parties.

Conducting due diligence and gathering further background information supports successful cross-border QA. This may include the agency contacting the local QA agency, and informing itself of previous external QA reports and decisions concerning the institution.

*How are the peer-review experts selected and trained?*

The QA agency should ensure the transparent and appropriate selection and training of the peer-review experts. Specific training and briefing is particularly important if they are working in an unfamiliar context.

The institution may also brief the peer-review experts on relevant contextual issues.

The institution, the QA agency and the peer-review experts should be sensitive to cultural and contextual differences.

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<sup>3</sup> If relevant, the QA agency should refer to EQAR's procedure for reporting substantive changes.

*Are the practical specificities of carrying out cross-border QA clear for both parties?*

The practicalities of cross-border QA set out in the formal agreement between both parties may include aspects such as language considerations and specificities of the site visit(s). The QA agency should clarify any language requirements in conducting cross-border QA. This has implications for the composition of the team of peer-review experts. The institution should consider the time and resources required to provide, if necessary, translations of relevant documents and interpretation during the site visit(s).

Both the QA agency and the institution should clarify in advance the arrangements for the site visit(s). Communication between the agency/team of peer-review experts and the institution should address various issues, which may include, in addition to language aspects, the length of the site visit(s), time allocated for interviews, the selection of interviewees and matters of reporting.

### **C. Addressing the results of cross-border QA**

*If applicable, what is the formal recognition process of a cross-border QA decision?*

The QA agency and institution should take into account any additional steps necessary for the formal recognition by the relevant national bodies of any decision following the completion of a cross-border QA procedure that is part of national mandatory QA. This may not be necessary or relevant to the same extent for voluntary cross-border QA.

While the style of reporting varies from one QA agency to

another, any national requirements or criteria should be addressed in the structuring and contents of the report to ensure its recognition if the process is part of the national mandatory QA. The agency should ensure the publication of and access to the full report.

*What are the complaints, appeals and follow-up processes?*

The QA agency should consider cross-border specificities in its complaints and appeals processes, based on the ESG. In case of substantiated unaddressed concerns about an agency's compliance with the ESG, EQAR's Complaints Policy should be referred to.

Both the QA agency and the institution should be aware of their respective responsibilities to ensure a proper follow-up to the external QA process. If the process is part of the national mandatory QA, the institution should consider whether there is any discrepancy or incompatibility between the agency's follow-up procedure and national requirements (e.g. timeframes for subsequent procedures).