



Study on the feasibility of a quality assurance and recognition system



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Executive summary

Purpose of the study

This report aims to assess the state of implementation of the Recommendation of the European Parliament and of the Council of 15 February 2006 on further European cooperation in quality assurance in higher education, which encouraged Member States to adopt a set of key principles for cooperation in quality assurance. Following this assessment, the report outlines a proposal on how cooperation in quality assurance in the EU could be further enhanced to support increased transnational cooperation in higher education as part of the European Education Area and examines options for the development of a European Quality Assurance and Recognition System. Building on the progress enabled by current transparency tools, such as the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the European Approach for Quality Assurance of Joint Programmes (European Approach), the vision is for future-oriented, fit-for purpose quality assurance, which safeguards minimum standards, ensures high quality learning environments and respects the autonomy of higher education institutions, while at the same time removing obstacles to effective transnational cooperation between them.

Methodology

The study was based on desk research, analysis of data on quality assurance activities in EU Member States, in particular from the European Quality Assurance Register for Higher Education (EQAR), interviews with 82 key national stakeholders (government authorities, quality assurance or accreditation agencies, higher education/sector representatives and experts) and 11 European-level stakeholders, and an online workshop with 34 experts from across the European Union (EU), where emerging needs on quality assurance in the EU and the future vision for the European quality assurance and recognition system were examined. The report presents data collected up to 7 November 2023.

Why is a Quality Assurance and Recognition System important?

Quality assurance and automatic recognition are crucial elements of successful transnational cooperation within the higher education sector, which brings substantial benefits to students, staff, higher education institutions, as well as to Europe as a whole.

Quality assurance in higher education refers to the policies and actions through which the quality of higher education is maintained and developed; cooperation in this area can help ensure transparency and mutual trust between institutions across different higher education systems.

The “academic recognition of diplomas and periods of study” is one of the explicit aims of European cooperation in education, as defined by Article 165 of the Treaty on the functioning of the EU. To support this, the Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad was adopted by education ministers on 26 November 2018¹.

Despite some progress made in both quality assurance and recognition², more remains to be done, particularly to link it better to quality assurance in order to increase trust between higher education institutions.

¹ 2018/C 444/01

² See ICF, 3s and CHEPS (2023) ‘Implementation of the 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad’ Luxembourg, Publications Office of the European Union. One finding of this

The quality assurance of transnational collaboration activities, such as joint programmes, can be challenging and administratively costly, if confronted with different national regulations and quality assurance procedures that have not adjusted to the needs of these collaboration activities. This can result in joint programmes having to undergo separate quality assurance and accreditation procedures in different countries. The increase and deepening in transnational collaboration, through initiatives such as the European Universities alliances and plans for a future European degree, further indicate the urgency of ensuring that quality assurance facilitates, rather than prevents, international cooperation and the delivery of high-quality and inclusive higher education.

Our study clarifies the link between quality assurance and recognition in order to assess what further steps are needed toward a more fit for purpose European Quality Assurance and Recognition System.

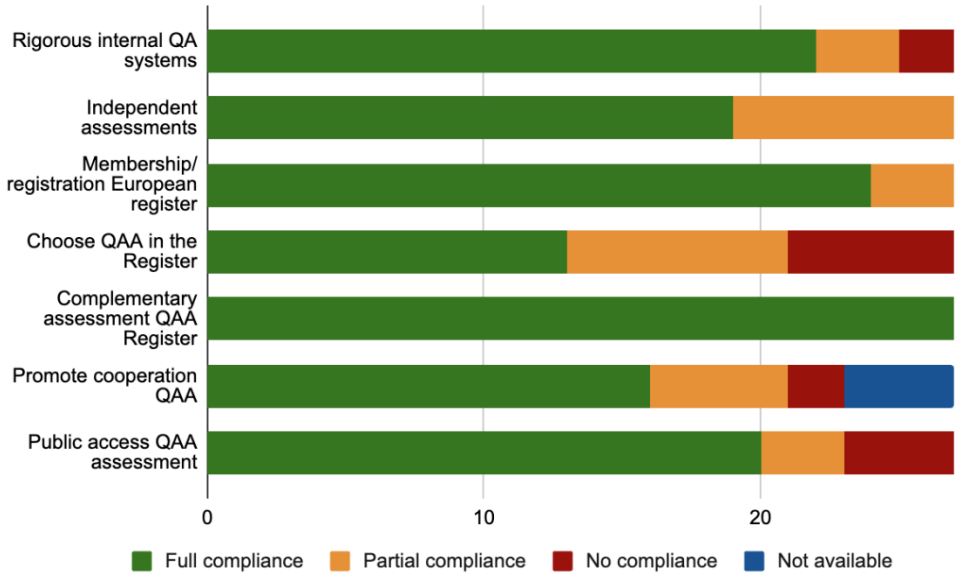
Summary of findings and recommendations

1. Implementation of the 2006 Recommendation on European cooperation in quality assurance in higher education

The 2006 Recommendation, in its current form, does not provide sufficient political direction for the future.

There has been clear progress in the implementation of most of the individual recommendations included in the 2006 Recommendation, as shown in Figure ES1.

Figure ES1. Level of implementation of the main elements of the 2006 Recommendation in EU Member States



Source: Country reports.

Seventeen years after the adoption of the Council Recommendation, only one of its individual recommendations has been fully implemented in all EU Member States: allowing higher education institutions to work towards a complementary assessment by another agency in a European quality assurance register (EQAR). A good level of implementation has been achieved in relation to the introduction of rigorous internal quality assurance systems in accordance with the Standards and Guidelines of Quality Assurance of the European Higher

report showed that one-third of higher education institutions check the quality assurance of the sending institution when deciding on recognition.

Education Area (ESG) and membership and registration in EQAR. There has tended to be greater progress in relation to recommendations that do not explicitly require international cooperation than in relation to those that refer more directly to this type of cooperation. Implementation of the recommendation on higher education institutions being able to choose among quality assurance or accreditation agencies in the European register has been particularly sluggish.

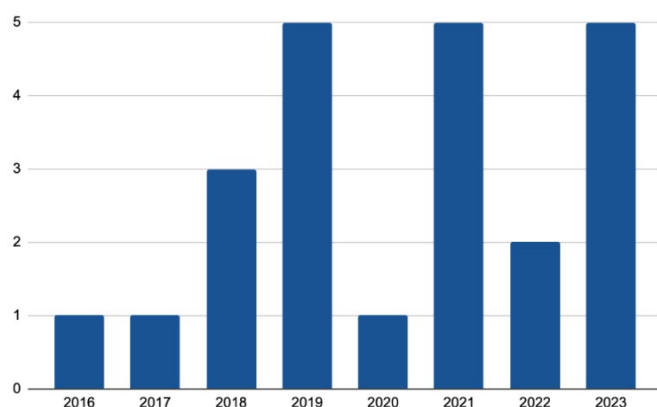
Recommendation 1: *Target additional support to EU Member States that would benefit from it to speed up implementation. This support could include mutual learning activities, particularly on the recommendations for which a large degree of variation in terms of implementation remains.*

Recommendation 2: *There is a need to update or replace recommendations which are no longer relevant, because they have been completely achieved, or because only a small set of countries remains to achieve them, and should include new areas of key importance for the future of European higher education³.*

2. The European Approach for the quality assurance of joint programmes

The implementation of the European Approach, which provides a common framework through a set of agreed European standards, can help to stimulate international cooperation, promoting a shared quality culture and the setting up of joint programmes. However, progress on its implementation has been slow. EQAR data shows only 23 joint programmes made use of the European Approach for the period 2016-2023, and does not show a marked increase in the use of the European Approach since 2019.

Figure ES2. Joint programmes that have used the European Approach



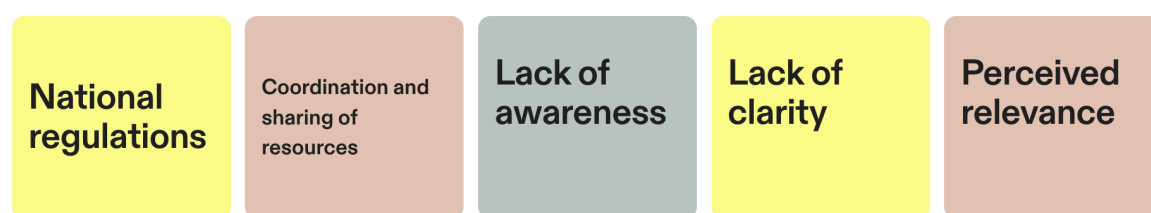
Source: Constructed from EQAR data⁴

The research identified several barriers to the use of the European Approach, including unfavourable and restrictive national regulations as a main obstacle. Its use remains hindered further by lack of knowledge about it and its benefits among other factors. At the time of writing some EU Member States still do not have a single higher education institution that has used the European Approach, according to EQAR data.

³ The inclusion of a 'process' theme, around efficiency in quality assurance processes, avoiding duplications, digitalising processes and making the best use of available data should also be considered.

⁴ <https://www.eqar.eu/kb/joint-programmes/european-approach-cases/>

Figure ES3. Barriers to the use of the European Approach



Source: Country reports, experts' workshop, PPMI (2023)

Recommendation 3: *Given the strong support for the European Approach encountered during this study, measures should be taken to overcome the barriers to its implementation. Member States should systematically embed the European Approach in national legislation as a first step, but also make sure that substantive quality assurance requirements at the national level (e.g. in terms of staffing, assessment and other areas) can be flexible enough not to hamper international cooperation. This should be complemented with more effective dissemination on what the approach means, and its benefits. It is important to continue sharing good practices through networking in quality assurance agencies and sectoral organisations' events. The European Commission could also consider providing additional incentives to use the European Approach in relevant funding calls, to stimulate its further use.*

3. Thematic focus of quality assurance

Quality assurance can cover different themes. The ESG focuses on quality assurance related to learning and teaching in higher education. Its 2015 update expanded the focus of the previous ESG to incorporate various new elements in learning and teaching, such as student-centred learning and greater emphasis on learning outcomes. However, increasingly important areas for the future of quality assurance are not covered appropriately in the 2006 Council Recommendation.

Recommendation 4: *It is recommended that quality assurance systems can respond to key societal developments affecting higher education, such as incorporating specific objectives in their regular external quality assurance or through focused or thematic quality reviews at system level. These developments could include topics such as the promotion of fundamental academic values, attractive and sustainable academic careers and working conditions, social inclusion, and the acquisition of green and digital skills.*

Ecosystems of micro-credentials are emerging in Europe, creating new challenges for quality assurance. While some countries apply, or aim to apply, the same quality assurance processes for micro-credentials as for other types of higher education credentials, most stakeholders interviewed for this study were of the view that this approach would likely be excessive given the nature of those credentials (larger numbers, more dynamic, etc.) and that the focus of external quality assurance should be on the institutional approach to micro-credentials. That is, micro-credentials should explicitly be included in the existing internal quality assurance procedures, and the main responsibility for quality assuring them will thus remain with the providers.

Recommendation 5: *The quality assurance of micro-credentials should be systematically incorporated in the internal quality assurance of institutions and the external quality assurance of micro-credentials should thus remain at the institutional level. Where no institutional external quality assurance exists, micro-credentials could be reviewed in clusters and as part of existing quality assurance procedures for the programme, group or discipline the micro-credential relates to.*

4. The shift towards an institutional approach to external quality assurance

The 2022 Council Recommendation on building bridges for effective European higher education called for Member States to “move further towards the use of institutional-based external quality assurance”. A 2023 survey⁵ showed that 10 Member States already use institutional-based external quality assurance, while 4 are in the process of moving to an institutional approach. This situation hampers European cooperation, in particular the development to joint programmes, such as a European degree.

Recommendation 6: *Member States should allow the transition towards institutional-based external quality assurance. This can be achieved by taking steps to support higher education institutions, such as through peer learning and capacity-building, as well as adapting legislation where necessary. These initiatives help to develop robust internal quality assurance systems and foster a strong quality culture, both of which are prerequisites for granting self-accreditation of programmes.*

5. The link between quality assurance and recognition

Substantial barriers to automatic recognition remain. Few systems have fully implemented it, whereas many countries are in a state of limited implementation or no implementation at all. Moreover, links between quality assurance and automatic recognition are often lacking in Member States. At present, recognition is insufficiently embedded in quality assurance processes, and national regulations do not always fully take into account quality assurance in line with the existing European frameworks as a basis to make recognition automatic.

Recommendation 7: *Actions to better integrate quality assurance and recognition to facilitate mobility should be implemented. This could entail embedding recognition more strongly as part of quality assurance processes, as well as using quality assurance outcomes to guarantee automatic recognition.*

Significant progress has been achieved with regards to the use of most transparency tools. However, some tools still require further efforts. Explicit references to the inclusion of all European Credit Transfer and Accumulation System (ECTS) elements in quality assurance remain limited to a minority of higher education systems in the EU.

Recommendation 8: *Further encouragement is needed for quality assurance agencies and higher education institutions to include all key ECTS elements in their quality assurance evaluations.*

Moreover, the ESG, the European Approach, EQAR and DEQAR could play an even stronger role in linking quality assurance and automatic recognition.

Recommendation 9: *Member States, QA agencies and higher education institutions should take further action to ensure the implementation and a more robust use of transparency tools, in particular the ESG, the European Approach and EQAR. This could include providing further guidance or further regulatory or financial incentives (for example, in the context of programme and module approval or renewal processes, or through EU project funding) to ensure implementation of these tools. They should also consider how to further develop existing transparency tools. DEQAR, for example, could serve as a central digital register that students and employers can access to obtain information on the quality of higher education institutions and the study programmes that they may wish to pursue, and for which the qualifications will be automatically recognised.*

⁵ Carried out for the European Education Area Strategic Framework Higher Education Working Group in June 2023

Recommendation 10: *Encourage and support the evaluation of the implementation of automatic recognition in the internal and external quality assurance processes of higher education institutions.*

6. Recommendations to develop a European Quality Assurance and Recognition System

The analysis of the implementation of the 2006 Council Recommendations, as well as of transparency tools, provides a basis for considering the next steps for European quality assurance and recognition, which provides development paths for countries with a programme-based approach, those with an institutional-based approach and for deeper forms of cooperation such as those created by European Universities alliances.

For countries with a programme-based or combined approach:

Recommendation 11: *Member States should allow, encourage and facilitate the implementation of the European Approach, including by not making it financially disadvantageous to do so.*

Institutional-based external quality assurance systems, combined with self-accreditation, provide more flexibility for the award of joint degrees and other forms of transnational cooperation, as it removes the requirement for formal external accreditation of each individual programme.

Recommendation 12: *Member States should limit compulsory programme accreditation to an initial accreditation of new programmes. Over time, higher education institutions should be allowed to further demonstrate the full functioning of their internal quality assurance arrangements through an institutional accreditation/audit and become exempt from programme accreditation, following the goal formulated by the 2022 Council recommendation.*

Given the complementarities between the European Approach standards and proposed European criteria for a European degree (label), stakeholders stressed the need to avoid duplication and the possible advantages of combining the assessment of European criteria for a European degree (label) with an (external or self) accreditation process against the European Approach standards, i.e. checking the compliance with the European criteria of a European degree (label) would be an optional add-on component in a regular European Approach process.

Recommendation 13: *Further stakeholder consultation is required at EU level to build on complementarities and synergies between existing quality assurance processes and the European degree (label) and to avoid duplications.*

Quality assurance of European Universities alliances:

Most stakeholders noted, during the course of this study, that quality assurance can entail significant administrative and financial, costs, which are particularly significant for the development of joint educational programmes and transnational activities by alliances, including the European Universities alliances.

Recommendation 14: *European Universities and other transnational alliances could choose to undergo a joint external quality assurance of their joint educational provision, with no requirement to have the same provision assessed again under regular external quality assurance procedures during the same period.*

Different interpretations of the recommendations related to quality assurance and recognition coexist, even among highly specialised experts, leading to differences in how progress and implementation are being measured, and different results. There is also a certain degree of

duplication in data collection efforts. There is a need to further clarify how to monitor progress at the country and institutional levels.

Recommendation 15: *There is a need for further work on EU level with stakeholders and institution to provide greater clarity on the definition of levels of alignment with a future Quality assurance and recognition system and how they should be measured. Duplication of efforts in data collection should be avoided.*

1 Introduction

This report constitutes the second work package of the 'Study on the implementation of the Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad and on the feasibility of a European Recognition and Quality Assurance System' (EAC/11/2021). This second work package focuses on the production of a feasibility study for a European Recognition and Quality Assurance System. The aim of the study was to assess the feasibility of a European Recognition and Quality Assurance System and to suggest updates to the Recommendation of the European Parliament and of the Council of 15 February 2006 on further European cooperation in quality assurance in higher education.

1.1 Context

The need to remove obstacles to effective transnational cooperation in higher education has increased in recent years, as transnational collaboration has become more important for higher education institutions. Within the European Union, major recent developments have included the creation of European Universities alliances and, linked to this development, a Blueprint for a European degree⁶ and the piloting of a European degree label⁷.

However, the quality assurance of transnational collaboration activities can be complex due to differing regulations across Europe. For example, the quality assurance of transnational activities, such as joint degrees, involves several higher education institutions and often needs to be accredited by several quality assurance agencies following different regulations and procedures. At the same time, individual mobility is still hampered by the lack of automatic recognition of higher education qualifications in many countries⁸.

The European Commission has highlighted the importance of addressing these challenges in various strategic documents and recommendations. The 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad⁹ noted that quality assurance “has a key role to play in improving transparency, thus helping to build mutual trust”, which facilitates mutual recognition. It explains that “external quality assurance, carried out by independent quality assurance agencies registered, or moving towards being registered, with the European Quality Assurance Register and which thus operate in line with both the Standards and Guidelines for Quality Assurance in the European Higher Education Area and the European Approach for Quality Assurance of Joint Programmes” is an important condition to foster transparency in higher education and build trust between Member States¹⁰.

A European Quality Assurance and Recognition System is one of six strategic European Education Area initiatives to be adopted by 2025. Consistent with the 2018 Council Recommendation, the Communication on achieving the European Education Area by 2025¹¹ called for the automatic recognition of qualifications and study periods abroad for the purpose of further learning, quality assurance of joint transnational activities and the recognition and

⁶ European Commission: Directorate-General for Education, Youth, Sport and Culture, Blueprint for a European degree – Communication from the Commission to the European Parliament, the Council, the European Economic and Social committee and the Committee of the Regions, Publications Office of the European Union, 2024, <https://data.europa.eu/doi/10.2766/496478>.

⁷ See <https://education.ec.europa.eu/document/results-of-the-erasmus-call-for-proposals-on-european-policy-experimentation-in-higher-education-piloting-a-joint-european-degree-label-and-institutionalised-eu-cooperation-instruments>

⁸ See ICF and 3s (2023) 'Implementation of the 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad' Luxembourg, Publications Office of the European Union.

⁹ [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018H1210\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018H1210(01))

¹⁰ C444/3.

¹¹ European Commission (2022) Progress towards the achievement of the European Education Area. Luxembourg, Office for Official Publications of the European Commission. https://education.ec.europa.eu/sites/default/files/document-library-docs/eea-communication-sept2020_en.pdf

portability of short courses leading to micro-credentials. The 2022 European Strategy for Universities¹² announced a review of quality assurance arrangements with a view to informing a proposal for a Council Recommendation on a European Quality assurance and Recognition system¹³.

1.2 Objectives of the study

This final report provides an assessment of the implementation of the 2006 Council Recommendation, which encouraged Member States to adopt a set of key principles for cooperation in quality assurance. The 2006 Recommendation is a central element in the European quality assurance cooperation framework, but was adopted almost 20 years ago, in a very different context, particularly given the recent pace of change in higher education. This report also reviews the first steps towards the implementation of Recommendation Seven of the 2022 Council Recommendation on building bridges for effective European Higher Education cooperation¹⁴, which aims to “strengthen mutual trust through external quality assurance and accreditation of joint educational programmes and other forms of joint educational offers developed by institutional transnational cooperation models, including ‘European Universities’ in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area”. Building on these assessments, the report then outlines a proposal on how cooperation in quality assurance in the EU could be further enhanced, to support the European Education Area. The vision is that such a system will ensure that external quality assurance safeguards the autonomy of higher education institutions while at the same time removes obstacles to effective transnational cooperation between higher education institutions (HEIs), addresses key challenges, strengthens academic recognition for the purpose of further learning and maintains public trust in higher education within and across Member States.

More specifically, the objectives of the study are to:

- provide an analysis on the state of implementation of the European Parliament and Council Recommendation on ‘Further European cooperation in quality assurance in higher education’ (2006/143/EC);
- map the use of European transparency tools that support quality assurance in higher education in EU Member States, with a focus on the European Credit Transfer System (ECTS), the European Qualifications Framework (EQF) and the qualifications framework for the European Higher Education Area (QF-EHEA), the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereafter ESG or European Standards and Guidelines), the European Quality Assurance Register (EQAR), the European Approach for Quality Assurance of Joint Programmes (European Approach thereafter)¹⁵ to identify differences and challenges of making full use of these tools;
- identify successful innovative practices in external quality assurance from the EU Member States and highlight relevant innovative practices from other areas;
- suggest how quality assurance systems could be further enhanced to support the European Education Area, in particular the European Universities alliances and a possible European degree;

¹² <https://education.ec.europa.eu/sites/default/files/2022-01/communication-european-strategy-for-universities-graphic-version.pdf>

¹³ COM/2024/147 Proposal for a COUNCIL RECOMMENDATION on a European Quality Assurance and Recognition System in Higher Education

¹⁴ [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32022H0413\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32022H0413(01))

¹⁵ See list of abbreviations in annex 1.

-
- identify where the Recommendation of the European Parliament and of the Council of 15 February 2006 on further European cooperation in quality assurance in higher education needs to be updated to take account of recent developments in this area;
 - collect information on the links between quality assurance and automatic recognition, identifying bottlenecks in quality assurance systems and how it affects the automatic recognition process, and assess how these links could support a European Quality Assurance and Recognition System; and
 - identify the main building blocks of a European Quality Assurance and Recognition System.

1.3 Outline

The rest of the report is structured as follows:

- Chapter 2 presents our methodology;
- Chapter 3 provides a general overview of the of quality assurance in the EU Member States;
- Chapter 4 reviews key trends in quality assurance in EU Member States;
- Chapter 5 assesses the state of play regarding the implementation of the 2006 Recommendation on further cooperation in quality assurance in higher education;
- Chapter 6 discusses the current situation regarding the relationship between quality assurance and recognition in EU Member States;
- Chapter 7 examines the feasibility of a European Quality Assurance and Recognition System; and
- Chapter 8 outlines the conclusions and recommendations of the study.

2 Methodology

This chapter summarises our methodology to assess the feasibility of a European Quality Assurance and Recognition system.

2.1 Data collection

The central research team and a network of national experts that covered all Member States conducted an extensive data collection exercise, covering the period until November 2023, based on:

- desk research analysis of quality assurance in Member States, leading to the production of country reports. National desk research covered material in all EU languages and explored the current status, as well as recent changes in national legislation and policies with regard to the 2006 Recommendation and Recommendation Seven of the 2022 Council Recommendation.
- Desk research also analysed innovative practice in quality assurance from outside the EU, outputs produced by EU projects on quality assurance, and three progress reports on the 2006 Recommendation (two reports produced by the European Commission in 2009 and 2014 and one study undertaken by an external contractor published in 2018¹⁶).
- An analysis of available quantitative data on quality assurance activity in EU Member States, in particular from EQAR, and the Erasmus+ projects database.
- Interviews with key stakeholders in Member States (82 in total; between two and five interviews per Member State, depending on information gaps and interviewee availability) including representatives from national authorities, national agencies/bodies active in the field of education, quality assurance or accreditation agencies, higher education/sector representative/experts. The stakeholder interviews analysed challenges, needs and their vision for quality assurance in the future. The list of interviewees is included in Annex 4.
- Eleven interviews with key European stakeholders to understand their position regarding the current challenges in quality assurance, possible solutions to these challenges and suggestions for a European Quality Assurance and Recognition System.
- A review of the data collected for the first part of the study on automatic mutual recognition in higher education, which relied on desk research, an extensive interview programme in EU Member States and a survey of stakeholders.
- An online workshop with 34 stakeholders, in which participants discussed emerging needs and a vision for a European Quality Assurance and Recognition System. The list of organisations represented in the workshop is provided in Annex 3.

2.2 Data analysis, validation and limitations

Data were analysed making use of thematic template analysis for qualitative data, as well as descriptive statistics for quantitative data. Both types of analysis were structured based on the areas to be covered by the study. The Recommendation of 2006 outlines a number of recommendations but does not systematically define specific indicators to measure progress against those recommendations. These indicators were defined by the central research team and approved by the client before data collection. National experts then collected data on these indicators by means of country narrative reports and an assessment of the country situation.

¹⁶ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2009:0487:FIN> ; [https://ec.europa.eu/transparency/documents-register/detail?ref=COM\(2014\)29&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2014)29&lang=en) and <https://op.europa.eu/en/publication-detail/-/publication/80cf98f3-1e01-11e9-8d04-01aa75ed71a1/language-en>

A series of cross-validation measures were undertaken to inform the inclusion of information in the report:

- triangulation with the results presented in other published sources (European Commission, projects and literature on quality assurance in higher education in Europe),
- sharing of country reports with national authorities,
- presentation of results in the feasibility workshop of 07 November 2023, and
- independent review of the analytical outputs by an international quality assurance expert.

While some of the recommendations included in the 2006 Recommendation are straightforward to assess, others required a significant degree of judgement by experts. This led to some discrepancies between the assessment made by country experts and other sources, such as the EQAR register and other relevant European Commission or third-party studies/surveys. To resolve these discrepancies, the study team examined the nature of the data and used the best evidence available, in terms of the nature of the data used to generate the assessment and the explanation provided to underpin it. This complexity originates from varying regulations governing different segments of higher education (e.g., private and public) and the flexibility granted to higher education institutions within a country to choose among different options regarding their quality assurance. Finally, in some Member States where higher education is a decentralised competence, this may lead to the co-existence of somewhat different quality assurance systems within the same Member State.

One of the limitations in the methodology used was related to data collection through interviews. Country researchers faced challenges due to a lack of responsiveness from stakeholders in several countries. This issue may be partly attributed to the timing of the interviews, conducted for the most part during the summer of 2023. Most of the gaps were eventually filled through the support of some interviewees who provided further relevant contacts for the study, as well as DG EAC and the external expert who supported ICF in the study.

Another limitation concerned the lack of information or details on the extent to which a certain practice or tool was applied in Member States. The research team, to the extent possible, requested clarifications to country researchers on what they provided in their country reports.

The results of our analysis are presented in the following chapters.

3 Quality assurance in the EU

3.1 Definition and purposes

Quality assurance in higher education refers to the policies, processes and actions through which the quality of higher education is maintained and developed¹⁷, and ensures a learning environment in which the content of programmes, learning opportunities and facilities are fit for purpose and meet agreed standards. Quality assurance can take different forms¹⁸. It can be internal or external. The first refers to the policies, processes and actions that higher institutions themselves put in place internally to monitor, evaluate and improve the quality of their programmes and activities. External quality assurance refers to those policies, processes and actions that external bodies or agencies undertake. External quality assurance is generally undertaken by independent quality assurance agencies, responsible for verifying whether institutions meet established national or international quality standards. Quality assurance can also take place at different levels (e.g. institutional level, programme level). Most EU Member States have a combination of institutional and programme-based external quality assurance.

As noted in the ESG 2015 (p.5), quality assurance also can have different purposes: “At the heart of all quality assurance activities are the twin purposes of accountability and enhancement. Taken together, these create trust in the higher education institution’s performance. A successfully implemented quality assurance system will provide information to assure the higher education institution and the public of the quality of the higher education institution’s activities (accountability) as well as provide advice and recommendations on how it might improve what it is doing (enhancement)”. The ESG refer to the multiple purposes of higher education – including preparing students for active citizenship, contributing to their employability, supporting their personal development, creating a broad advanced knowledge base and stimulating research and innovation – and highlight that different stakeholders may prioritise different purposes and thus can view quality in higher education differently. The ESG thus do not impose a monolithic definition of quality but describe it mainly as a “result of the interaction between teachers, students and the institutional learning environment”¹⁹. According to the ESG, quality assurance “should ensure a learning environment in which the content of programmes, learning opportunities and facilities are fit for purpose”.

A further distinction relates to formative and summative quality assurance. The formative purpose of quality assurance refers to quality enhancement or informing the public, whereas the summative focuses on accountability and results in a judgment and decision related to higher education provision – for example, whether an institution can use the ‘university’ or ‘higher education institution’ title, whether it can acquire or retain the rights to offer a specific study programme or whether it can have self-accrediting rights for its programmes. Summative assessments may also be linked to access to public funding associated with the offering of recognised higher education programmes.

The country reports collected for this study show that these two purposes of quality assurance, formative and summative, are present in quality assurance systems in EU Member States, but on the whole, external quality assurance was more frequently related to informing the public, and to the formative aims of quality assurance more generally, than internal quality assurance -see Annex 5 for details. However, while there is widespread endorsement for the quality enhancement purpose of quality assurance in EU countries, in practice quality enhancement

¹⁷ Campbell, C. & Rozsnyai, C., (2002) *Quality Assurance and the Development of Course Programmes*. Papers on Higher Education Regional University Network on Governance and Management of Higher Education in South East Europe Bucharest, UNESCO.

¹⁸ A related concept is ‘accreditation’, which is narrower than the concept of quality assurance and specifically to the process through which an external accrediting body evaluates and certifies that a higher education institution or programme(s) meet predetermined standards and criteria and can be trusted by students, employers and other stakeholders. Accreditation is thus a form of quality assurance. Higher education institutions may have self-accrediting right on the programmes that they offer or may need or want to be externally accredited. Accreditation may be initial (when a programme is set up) or periodic.

¹⁹ ESG, p.7

and embedding a quality culture need to be further supported -see also the results of the QA-FIT project²⁰.

Some country researchers mentioned additional operational purposes for quality assurance. For example, in Sweden, an important purpose of quality assurance is meeting international commitments and aligning with the ESG. There were other systems where links to internationalisation were mentioned in its operational aspects; for example, with reference to the appointment of international members in panels for institutional accreditation (e.g., Denmark and Estonia), external evaluation panels (e.g., Slovenia), panels for internal reviews (e.g., Ireland) or the evaluation of quality assurance agencies (e.g., Spain).

3.2 Main stakeholders

Higher education institutions are the central actor in quality assurance, while Ministries typically oversee the drafting of relevant legislations and regulations and quality assurance agencies have a key role in external evaluation, as discussed in more detail in the following sections. In addition, foreign quality assurance agencies or accreditation bodies, from within and outside the EU Member States, may also conduct quality assurance activities in the EU. For example, AAQ (the Swiss Agency of Accreditation and Quality Assurance) has carried out external quality assurance activities in Austria, Germany and Luxembourg²¹. Seven registered agencies have operated in Ireland along with the Irish quality assurance agency Quality and Qualifications Ireland²². These agencies have conducted complementary assessments for specific purposes. For example, the Agency for Quality of the Basque University System (Unibasq) accredited a joint master's degree programme, International Humanitarian Action (NOHA²³⁺).

The involvement of stakeholders in the development of quality assurance tools and policies is of central importance to ensure their value and use²⁴. ESG underline this point and promote the involvement of stakeholders such as students, staff, employers, other external partners of higher education institutions or external experts in quality assurance processes [standard 2.4] and in the governance and work of quality assurance agencies [standard 3.1].

For example, student involvement often takes the form of membership in programme committees, self-evaluation teams or expert panels²⁵ or participation in student satisfaction surveys. Student unions, on the other hand, are engaged in various quality assurance related activities, such as policy consultations within ministries, cooperation with quality assurance agencies, including through nominating students for governance or advisory boards, training for students or (co)-running student expert pools²⁶. The number of countries where students are involved in quality assurance has increased significantly over time, as noted in the Bologna process implementation report 2020²⁷.

²⁰ See section 3 and QA-FIT, which shows that for 55% of respondents' quality enhancement is a main purpose of external Quality Assurance, Brussels: European University Association, p.12

²¹ <https://www.eqar.eu/register/agencies/agency/?id=3>

²² These foreign agencies are the Agency for Quality Assurance through Accreditation of Study programmes AQAS (Germany), the Agency for Quality of the Basque University System (Spain), the British Accreditation Council for Independent Further and Higher Education (UK), the Catalan University Quality Assurance Agency (Spain), the European Association of Establishments for Veterinary Education (EU-wide, located in Austria), the Institutional Evaluation Programme (EU-wide, located in Switzerland) and the Quality Assurance Agency for higher education (UK).

²³ <https://www.nohanet.org/masters>

²⁴ A list of the acronyms used as organisations' names is included in the glossary in annex 1.

²⁵ Gvritishvili, A. and Onita, H. (2023) 'Students are essential to achieving quality in universities' University World News <https://www.universityworldnews.com/post.php?story=20230418144622114>

²⁶ Onita, H., Gvritishvili, A. and Maruszczak, J. (2023) 'Quality Assurance Fit for the Future –Students' Perspectives. QA FIT Report. <https://esu-online.org/publications/quality-assurance-fit-for-the-future-studentsperspective/> p.4

²⁷ <https://eurydice.eacea.ec.europa.eu/publications/european-higher-education-area-2020-bologna-process-implementation-report>

Student involvement in committees is too often limited to attendance rather than active engagement²⁸. Student feedback can also be treated in a tokenistic way. A recent survey of 31 national unions of students in the European Higher Education Area undertaken by the Erasmus+ project QA-FIT²⁹ found that the majority of these report that follow-up to student evaluations is not the norm: only two thirds reported that students can participate in evaluations of teaching quality on a regular basis and more than half reported that students seldom receive information on the follow-up actions after completing such surveys. This is consistent with the results presented in the Bologna with Student Eyes 2020 report, which found that students lack trust that their inputs will lead to meaningful change³⁰. The QA-FIT project notes that the culture of student union participation in quality assurance is strong in some countries and that, in some cases, student unions have their own pool of student experts in quality assurance who can help with both internal and external quality assurance processes. However, the QA-FIT results also indicate that there is a need to improve the nature of student involvement in quality assurance, enable greater interaction and provide students with relevant training to perform their role in quality assurance³¹. One of the challenges is, indeed, finding students with relevant expertise to contribute to quality assurance reviews. In this respect, the European student union 'Quality Assurance Student Expert Pool'³² promotes student participation in quality assurance across Europe and organises study sessions, workshops and other events for the training of students on quality assurance. ESG have been instrumental in stimulating student participation in quality assurance³³.

Similarly, while many countries formally require that employers take part in quality assurance, their active involvement is often challenging³⁴. The 2018 progress report on the implementation of the 2006 Recommendation³⁵ suggested that employers can be part of panels in quality assurance agencies, but also that higher education institutions should assume more responsibility for cooperation with employers to make them an integral part of internal quality assurance. Although some systems have been involving business representatives in higher education governance structures (e.g. Germany, Estonia, Croatia), their involvement in quality assurance is generally low. This represents a challenge, as national authorities and quality assurance agencies frequently see employability as one of the most important indicators of higher education quality³⁶. Cooperation with employers most often takes place in the areas of curricular design, review and monitoring of study programmes, the creation of opportunities for students to access workplace learning through placements and internships, and strategic partnerships in research and consultancy. Quality assurance agencies or higher education institutions (as part of their internal programme approval processes) often require information on how study programmes correspond to the needs of the labour market, while others may require that graduate tracking systems are operational and used for continuous programme improvement. Employer surveys and administrative data on the labour market outcomes of graduates are some of the data sources used for those purposes. Since 'big data' collected from online job advertisements has become available, higher education institutions are also

²⁸ Gvritishvili, A. and Onita, H. (2023) 'Students are essential to achieving quality in universities' University World News <https://www.universityworldnews.com/post.php?story=20230418144622114>

²⁹ <https://www.enqa.eu/projects/quality-assurance-fit-for-the-future-qa-fit/>

³⁰ See <https://esu-online.org/bologna-with-student-eyes-2020/>

³¹ Gvritishvili, A. and Onita, H. (2023) 'Students are essential to achieving quality in universities' University World News <https://www.universityworldnews.com/post.php?story=20230418144622114>

³² <https://esu-online.org/pools/qa/>

³³ Onita, H., Gvritishvili, A. and Maruszczak, J. (2023) 'Quality Assurance Fit for the Future –Students' Perspectives. QA FIT Report. <https://esu-online.org/publications/quality-assurance-fit-for-the-future-studentsperspective/> p.4.

³⁴ Eurydice (2014) Modernisation of higher education in Europe: Access, retention and employability. Luxembourg, Publications Office of the European Union.

³⁵ European Commission, Directorate-General for Education, Youth, Sport and Culture (2018) *Study to evaluate the progress on quality assurance systems in the area of higher education in the Member States and on cooperation activities at European level – Final report*, Publications Office.

³⁶ 2018 progress report.

making use of labour market analytics to monitor labour market demands (e.g., Open University of Catalonia in Spain³⁷). The European Commission is addressing the need for systems to collect, analyse and use data on graduate outcomes through the European Network on Graduate Tracking³⁸, which implements the Council Recommendation on tracking graduates³⁹.

Quality assurance agencies may also cooperate with other organisations, such as private sector evaluators, for quality assurance purposes. This is the case in the Netherlands, where the NVAO accreditation body makes decisions on the quality of higher education institutions and programmes based on self-assessment reports which can be based on work by private quality agencies that support higher education institutions – although this system is being phased out following the introduction of institutional audits and institutional accreditation.

3.3 The organisation of quality assurance

3.3.1 Internal quality assurance and its relation to and external quality assurance

The primary responsibility for quality assurance “rests with the institutions through their internal quality assurance processes”⁴⁰. Internal quality assurance “makes use of available information on the experiences of students and staff in the higher education programmes offered by the institutions, and on students’ study progress and outcomes after graduation (...). The views of different stakeholders (students, staff and representatives of the labour market) are taken into account. The internal quality assurance process therefore provides input for the external quality assurance process”⁴¹. According to Eurydice⁴², the ESG principle of institutional autonomy implies that the primary responsibility for quality assurance in higher education lies with each institution itself, laying the foundation for the accountability of the university system within national quality frameworks. Higher education institutions thus are able to choose those approaches and arrangements which better suit their own profile, needs and objectives.

In line with the principle of institutional autonomy, the organisation of internal quality assurance can vary substantially by institution, or by type of institutions, within EU Member States, in terms of specific structures and responsibilities. For example, the internal quality assurance of universities, universities of applied sciences, private higher education institutions and university colleges of teacher education are subject to somewhat different regulations in Austria.

It is thus not possible to provide a comprehensive overview of such different arrangements. However, some contrasting arrangements can be identified. In some countries the main areas covered by internal quality assurance are defined by law (e.g. Luxembourg or Latvia). Law can also establish certain organisational requirements. In Cyprus, the Private Universities Law provides for the establishment and operation of an Internal Evaluation Committee (Επιτροπή Εσωτερικής Αξιολόγησης), which evaluates the standard of the academic work offered in all departments and submits suggestions for improvement. In Greece, higher education institutions are required to have a Quality Assurance Unit (MODIP), responsible for the coordination and support of quality assurance processes, set up by a decision of the institution’s board, and consisting of the Rector, or one of its deputies as President, five professors, one representative of undergraduate students and one representative of postgraduate students and doctoral students, if any. The MODIP also consists of one representative from each personnel category with a voting right, when issues of the respective

³⁷ <https://www.uoc.edu/portal/en/index.html>

³⁸ For more information, see: [European Network of Graduate Tracking | European Education Area \(europa.eu\)](#)

³⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017H1209%2801%29>

⁴⁰ OECD (2019) Benchmarking Higher Education System Performance. OECD, Paris. p.89.

⁴¹ Ibid.

⁴² <https://eurydice.eacea.ec.europa.eu/national-education-systems/france/quality-assurance-higher-education>

personnel category are discussed, as specified in the Organisational Charter⁴³. In various systems, higher education institutions need to submit yearly reports of their activities to regional or national governments (e.g. in Cyprus and Spain) or make them available on their websites (e.g., in France or Slovenia). In Slovakia, higher education institutions are required to submit to the ministry of education and to publish an annual report on their activities⁴⁴.

However, in line with institutional autonomy, legislation infrequently regulates internal quality assurance in detail. For example, in Denmark, institutional accreditation allows institutions to organise its quality assurance system as long as it can show effectiveness in a set of criteria for quality laid down by government⁴⁵. In Poland, legislation does not regulate in detail approaches to internal quality assurance; it only provides general principles for study programmes, teacher appraisal and student course evaluation. Higher education institutions' standards and procedures and areas of focus for internal quality assurance may be informed by national guidelines⁴⁶ and self-evaluation frameworks⁴⁷, as well as the ESG. In Slovenia, there are no common national recommendations for internal evaluation, but in defining the criteria for evaluation, "the HEIs cooperate with the SQAA and consider European standards and guidelines. Accreditation criteria specify the fields that must be covered by the self-evaluation. Each HEI has internal rules, which govern the services and bodies responsible for the implementation of self-evaluations, the procedures and criteria of self-evaluation, planning of evaluations, analysis, and development of self-evaluation reports"⁴⁸.

Organisationally, the internal responsibility for the evaluation of institutional performance often resides in the rectorate or senate of the institution, often supported by quality committees. For example, in Luxembourg, internal quality assurance procedures are worked out by the rectorate. In Poland internal quality assurance rests with the senate of the higher education institution, which set out detailed arrangements for internal quality assurance in the internal regulations of the higher education institution. These are then reviewed during the external quality assurance processes of the Polish Accreditation Committee (PAC) or other quality assurance agencies. In Slovenia, by law, the rector of the higher education institution is responsible for setting up, maintaining and improving quality, and reports to the senate every year.

Programme leads and boards of studies play a central role in the internal quality assurance of programmes. External examiners, often academics working at a different higher education institution, may be used to enrich the internal quality assurance process and support programme leads by providing an external perspective on the programme standards. In line with ESGs, data from employers and students may also be used to inform internal quality assurance assessments, although the involvement of these stakeholders varies substantially by institution and even by programme, as discussed in the previous section.

Staff appraisal is frequently part of internal quality assurance systems, and although appraisal systems may vary substantially between institutions, staff line managers and central human resources management departments are involved in these processes. Human resources managers, in collaboration with university leadership (e.g. Rector or Vice-Chancellor), the senate, deans, trade unions and students are important stakeholders in the setting up of the structures to carry out appraisals. The results of negative appraisals may lead to the opening of disciplinary procedures (e.g. in Spain) and eventually to the termination of the contract of the staff member, as is the case in Poland⁴⁹. Specific development programmes may be in

⁴³ <https://eurydice.eacea.ec.europa.eu/national-education-systems/greece/quality-assurance-higher-education>

⁴⁴ See <https://eurydice.eacea.ec.europa.eu/national-education-systems>

⁴⁵ <https://www.retsinformation.dk/eli/ta/2021/1558>

⁴⁶ See, for example, for the case of Malta <https://mfhea.mt/wp-content/uploads/2021/03/Step-by-step-guide-to-Internal-Quality-Assurance%E2%80%8B.pdf>

⁴⁷ As is for example the case in Belgium France; see https://www.aeqes.be/infos_documents_details.cfm?documents_id=246

⁴⁸ <https://eurydice.eacea.ec.europa.eu/national-education-systems/slovenia/quality-assurance-higher-education>

⁴⁹ <https://eurydice.eacea.ec.europa.eu/national-education-systems/poland/quality-assurance-higher-education>

place to guarantee the training and competence of university teaching staff, through an assessment of their teaching activity, such as ANECA's DOCENTIA programme in Spain⁵⁰.

Higher education institutions often work in collaboration with external quality assurance agencies or bodies and may be subject to external quality assurance processes for the purpose of accountability that have consequences for their functioning or the resources that they receive. Such external quality assurance processes can feed into internal quality assurance – for example, in Finland, there are no national directives regarding the methods of internal evaluation, yet the results of external evaluations may be used as guidelines for internal evaluation.

Moreover, internal quality assurance processes also often feed into external evaluation exercises. ESG 2.1 notes that: “Quality assurance in higher education is based on the institutions’ responsibility for the quality of their programmes and other provision; therefore, it is important that external quality assurance recognises and supports institutional responsibility for quality assurance”. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards for internal quality assurance⁵¹. However, external quality assurance goes beyond internal quality assurance by checking that internal systems are appropriate and fit for purpose, well-functioning, effective and compliant with international standards. Negative assessments of internal quality assurance procedures can have significant consequences: for example, “if the Estonian Quality Agency for Higher and Vocational Education has brought the minister’s attention to severe deficiencies in the internal quality assurance system of an institution, the minister first has the right to give the institution a deadline for eliminating the deficiencies. If the deficiencies are not eliminated or the educational institution cannot eliminate them without additional resources, the minister has the right to initiate the quality assessment of all curricular groups of the educational institution at the expense of the institution (in case of a state-owned institution, at the expense of the state) or a reorganisation/closure of the educational institution and withdrawal of the right to conduct studies”⁵².

3.3.2 External quality assurance: number of quality assurance agencies

All EU Member States have at least one quality assurance agency⁵³, except Luxembourg⁵⁴. There has been a trend towards a one agency model, as a result of the merging of different entities that were previously involved in quality assurance in some countries. This has been the case for example in Austria (as detailed below in this section), or in Cyprus, where the Cyprus Agency of Quality Assurance and Accreditation in Higher Education (DI.P.A.E.) was established in 2015 as the competent authority for quality assurance and accreditation in higher education in the country, replacing the Council of Educational Evaluation and Accreditation (CEEAA), the Advisory Committee on Higher Education (ACTE) and the Evaluation Committee for Private Universities (ECPU) and assuming their responsibilities.

However, some countries have more than one quality assurance agency. This is the case in Germany and Spain, given the presence of several competing agencies in Germany and agencies at the level of the *Comunidades Autónomas* in Spain. Countries may also have more than one quality assurance agency based on the subject (e.g. technical, artistic, teacher education, sports education, etc.), level of higher education (short-cycle, doctoral programmes, etc.), or type of institutions (e.g. higher vocational education programmes, private higher

⁵⁰ <https://www.aneca.es/en/teaching-quality-assurance-system>

⁵¹ https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf p.18.

⁵² <https://eurydice.eacea.ec.europa.eu/national-education-systems/estonia/quality-assurance-higher-education>

⁵³ See Eurydice <https://eurydice.eacea.ec.europa.eu/national-education-systems/>

⁵⁴ Since there is no agency responsible for quality assurance in Luxembourg, the Ministry of Higher Education and Research signed a cooperation agreement with NVAO to implement quality assessments, develop assessment frameworks and advise Luxembourg government.

education institutions, etc.). This is the case in Austria, France, Germany, Latvia, Poland and Slovenia⁵⁵.

- In the case of Austria, in 2012 and on the basis of the Federal Act on Quality Assurance in Higher Education, the Agency for Quality Assurance and Accreditation Austria (AQ Austria) was established, bringing together the tasks and responsibilities previously held by the Austrian Quality Assurance Agency (AQA), the Austrian FH Council (FHR) and the Austrian Accreditation Council for Private HEIs (ÖAR). However, all matters related to quality assurance at university colleges of teacher education, are within the scope of responsibility of the Federal Ministry of Education, Science and Research and the Quality assurance council for teacher training (QSR), set up with the Federal Framework Law concerning the Introduction of a New Teacher Training Scheme, ensure external quality assurance for the development of teacher training programmes.
- In Germany, external evaluation is performed by competing evaluation agencies and lead to an accreditation decision by a national Accreditation Council (GAC). In parallel to the accreditation system for all higher education institutions and programmes, the Science Council carries out the institutional accreditation procedures for non-state universities
- In France, three agencies are involved in the quality assurance of higher education: the high council for the evaluation of research and higher education (Hcéres) the General Inspectorate of Education, Sport and Research (IGÉSR), and the *Commission des Titres d'Ingénieur* (CTI).

It is also worth noting that each EU Member States has more than one EQAR registered agency operating in it⁵⁶. Spain and France are the countries with more EQAR registered agencies operating in their territory, with 20 and 15 agencies respectively.

3.4 Conclusions

Quality assurance systems remain diverse across the EU in terms of types and purposes. An important aspect to consider is that while the quality enhancement role of quality assurance at the programme and institutional level is similarly widespread for internal and external quality assurance, the development of a quality culture in practice requires further support. As could be expected, the public-informing role of quality assurance is more widespread in the case of external quality assurance.

The chapter has also examined the range of stakeholders involved in quality assurance. This examination shows that, in spite of the ESG, the meaningful involvement of students and employers is not yet widespread.

The primary responsibility for quality assurance rests with the institutions through their internal quality assurance processes. To carry out this responsibility appropriately they often work in collaboration with external quality assurance agencies.

⁵⁵ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0413\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0413(01))

⁵⁶ <https://www.eqar.eu/kb/country-information/>

4 Trends in quality assurance in the EU

4.1 Introduction

The ESG initially adopted in 2005 provided a tool to develop comparable criteria for quality assurance in higher education. A set of recommendations later provided further steps forward for European cooperation in quality assurance in higher education. The 2006 Recommendation argued that quality assurance plays a key role in enabling higher education institutions to improve their performance and provided a set of specific recommendations in this area, whereas the 2018 Council Recommendation on the promotion of automatic mutual recognition noted quality assurance's role in improving transparency, thus helping to build mutual trust and facilitating recognition.

Recommendation Seven of the 2022 Council Recommendation on building bridges aimed to facilitate engagement in deeper cooperation in higher education, and the implementation of joint transnational education programmes and activities, including through quality assurance. A European Quality Assurance and Recognition System is one of six strategic European Education Area initiatives to be adopted by 2025, to ensure that quality assurance and recognition arrangements are fit for purpose in the context of an evolving higher education landscape⁵⁷. The 2022 Commission Communication on a European Strategy for Universities called for a European quality assurance and recognition system where the quality of qualifications is assured, the qualifications are digitalised and recognised automatically across Europe, doing away with the bureaucracy that hinders mobility, access to further learning and training or entering the labour market.

The same year, the European strategy empowering higher education institutions for the future of Europe called for the implementation of the European Approach as well as progress in the recognition and visibility of the value of innovative transnational learning experience. The 2022 Council Recommendation regarding the European Approach to micro-credentials for learning and employability encouraged Member States to support the quality and transparency of micro-credentials⁵⁸.

Other developments within the European Education Area, such as the European Universities Initiative, the exploration of a possible European degree and related pilot projects further indicate the urgency of ensuring that quality assurance facilitates, rather than prevents, international cooperation and the delivery of high-quality higher education. The above political declarations and initiatives call for the full implementation and, where appropriate, further development of the existing framework and the realisation of transparent and coherent quality assurance systems that are conducive to international cooperation.

This section provides an overview of the main rationales for policy change in quality assurance in the EU Member States, ESG and the European Approach, followed by information on emerging priorities in the thematic focus on quality assurance, micro-credentials and lifelong learning, European Universities alliances, micro-credentials and lifelong learning and digitalisation and sustainability. This overview is based on data from country research undertaken for this assignment, cross-checked with other sources, as detailed in the main body of the section.

⁵⁷ European Commission (2022) Progress towards the achievement of the European Education Area. Luxembourg, Office for Official Publications of the European Commission.

⁵⁸ Interview, European Universities Association 17 July 2023.

4.2 Main drivers for policy change in quality assurance and support tools

4.2.1 Main drivers for policy change

Quality assurance systems have evolved substantially during the period under review in this report. The main reasons identified by the country researchers as drivers for those changes are summarised below:

- **Alignment with the ESG and compliance with other EU or EHEA policies and guidelines** was reported in a large number of cases (e.g., in Belgium (Flemish and French Communities), Cyprus, Czechia, Greece, Finland, Ireland, Italy, Latvia, Lithuania, Netherlands, Portugal, Romania, Sweden, Slovakia, Slovenia, Spain). For instance, in Italy, the national agency for the evaluation of universities and research institutes (ANVUR) recently revised the periodic evaluation/ assessment procedure to align it more closely to the ESG through the inclusion of an assessment of financial procedures and are also updating their website to make full evaluation reports more accessible. In Portugal, the quality assurance system and the accreditation procedures of cycles of studies and institutions were subject to a profound legislative reform in 2006, which aimed at designing and implementing a new quality assessment system that would adopt the ESG. In Slovakia, a January 2022 amendment to the Act on Quality Assurance in Higher Education shortened the deadline (from December 2024 to December 2022) for universities to request a compliance assessment of their internal quality system with the legally approved standards that had entered into force on 1 September 2020 (Act No. 269/2018 on Quality Assurance in Higher Education). This change accelerated the harmonisation of the Slovak quality assurance system with the ESG⁵⁹. The ESG are reviewed in more detail in Section 4.3.
- **Strengthening of the transnational cooperation dimension** (e.g., in Austria, Bulgaria, Cyprus, Greece, Hungary, Lithuania, Netherlands, Romania, Spain). While a wide set of countries have introduced legislation to enable the implementation of the European Approach, some have adopted further measures more recently. For example, in Austria, relevant authorities are promoting the use of the European Approach to accredit and evaluate joint programmes: the *Fachhochschul-Akkreditierungsverordnung* decree (2021) includes more details on the implementation of the European Approach for joint degrees. In Czechia, a new law is under development to make it possible to use the European Approach, which cannot be currently used as national law states that all programmes must be quality assured and accredited by the National Accreditation Bureau for higher education or Czech accredited institutions. Romania introduced the possibility for Romanian universities to offer joint programmes with other higher education institutions of the EHEA in 2021 and to issue joint qualifications and set provisions for the accreditation of these programmes according to the European Approach. There have also been changes besides the adoption of the European Approach to strengthen transnational cooperation. For example, in Hungary, legislative changes were implemented following the recommendation of the Hungarian Accreditation Committee (MAB) to facilitate the quality assurance of joint programmes which are part of the CHARM-EU University Alliance⁶⁰. The European Approach is reviewed in more detail in Section 4.5.
- **Gradual promotion of institutional-based over programme-based quality assurance** (e.g., in Latvia, Netherlands, Portugal, Slovakia). For instance, in Latvia, national authorities are planning to discontinue study field assessment and

⁵⁹ Eurydice, Slovakia - National reforms in higher education (europa.eu), Last updated 13 September 2023.

⁶⁰ Hungarian Accreditation Committee, MAB, Report for the year 2020 until September 2021, p. 9, URL: [MAB-Annual-Report-2021_v2..pdf](https://mab.hu/annual-report-2021_v2.pdf)

accreditation procedure after 2024 and replace it with an institutional accreditation procedure, as already approved by the government. Similarly, in the Netherlands the implementation of the new assessment framework aims to enable higher education institutions to undertake the self-accreditation of their study programmes, following a favourable external institutional quality assurance processes.

- **Streamlining of quality assurance procedures** (e.g., in Belgium (Flemish Community and French Community), Italy, Netherlands, Spain). For instance, in the Netherlands, from February 2018 onwards, following the adoption of the Dutch Customised Accreditation Act, institutions and programmes were reviewed based on the Assessment Framework for the Higher Education Accreditation System of the Netherlands 2018 (Framework 2018). One of its principles was a categorical, undifferentiated conclusion (positive, conditionally positive, and negative⁶¹) aimed at simplifying the quality assurance process.
- **Increasing the transparency of the external evaluation/accreditation procedures** (e.g., Cyprus, Malta, Spain). For example, in Malta, the Amendments to the Further Higher Education Act (2020-2021) more transparently outlined the composition and powers of the Board of the Malta Further and Higher Education Authority and the Quality Assurance Committee.

4.3 ESG as a major driver

As highlighted in the previous section, the motivations for change in quality assurance are varied, but internationalisation has been an important aspect. The ESG have been particularly important in this regard, and various Member States have introduced changes to better align their quality assurance systems to the ESG. Thus, ESG, as a main tool for the transparency of quality assurance in Europe, and EQAR (the European Quality Assurance Register for Higher Education) as a gatekeeper of ESG compliance, are described in more detail in this section.

As noted by EQAR, ESG are “a set of standards and guidelines for internal and external quality assurance in higher education. The ESG are not standards for quality, nor do they prescribe how the quality assurance processes are implemented, but they provide guidance, covering the areas which are vital for successful quality provision and learning environments in higher education”⁶². They aim to contribute to enhancing transparency, quality and mutual trust in higher education in the European Higher Education Area, to facilitate recognition and mobility.

The first version of the ESG was adopted in 2005, but ESG were revised in 2015 to improve their clarity, applicability and usefulness, including their scope – placing greater emphasis, for example, on student-centred learning-, detailing the involvement of external stakeholders in internal and external quality assurance and clarifying the relationship between different types of quality assurance⁶³.

The four main principles of quality assurance outlined in the ESG are:

- Location of the primary responsibility for the quality assurance of higher education at higher education institutions;
- Quality assurance must acknowledge diversity (of higher education systems, institutions, programmes and students);

⁶¹ See

https://www.nvao.net/files/attachments/139/Assessment_Framework_for_the_Higher_Education_Accreditation_System_of_the_Netherlands_2018.pdf p.4

⁶² <https://www.eqar.eu/kb/esg/#timeline-of-the-revision-process>

⁶³ A full mapping of the differences between the ESG 2005 and 2015 was provided by the EQUIP project https://www.eqar.eu/assets/uploads/2020/06/EQUIP_comparative-analysis-ESG-2015-ESG-2005.pdf

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- Giving quality assurance a central role in supporting the development of a quality culture in higher education; and
 - Quality assurance should consider the needs and expectations of all stakeholders, internal and external.

The ESG acknowledge that quality is not easy to define and is “mainly a result of the interaction between teachers, students and the institutional learning environment”⁶⁴. The ESG are thus intended to be used as reference points for the quality assurance processes of institutions and quality assurance agencies, and do not impose a single model for quality assurance. The ESG nevertheless expect that “quality assurance should ensure a learning environment in which the content of programmes, learning opportunities and facilities are fit for purpose”⁶⁵.

EQAR was founded in 2008⁶⁶ to maintain a register of national quality agencies compliant with the ESG and thus contribute to the transparency of the work of such agencies across Europe. This was expected to facilitate the mutual acceptance of quality assurance decisions across Europe, and thereby recognition and mobility. To further its contribution to these goals, EQAR launched in 2018 the Database of External Quality Assurance Results (DEQAR), in which EQAR-registered agencies publish their reports and the decisions of the evaluations of HEIs and their study programmes.

To be registered in EQAR, quality assurance agencies need to show ‘substantial compliance’ with the ESG. To maintain their registration, these agencies need to successfully pass a periodic reviewed for compliance with the ESG every five years. EQAR allows “all stakeholders and the general public open access to objective information about trustworthy quality assurance agencies that are working in line with the ESG”⁶⁷. In this regard, “the creation of the ESG provided standards and criteria for quality assurance, while the creation of a register allowed these to be put into practice”⁶⁸. Thus, the ESG and EQAR have significantly contributed to the development of quality assurance systems in Europe, influencing agencies to be compliant with ESG. ESG, additionally, have contributed significantly to the use of other transparency tools; for example, it has stimulated the ‘recognition and promotion of the use of learning outcomes and the ECTS’⁶⁹.

4.4 The move towards institutional-based external quality assurance

Recently, Recommendation Seven of the 2022 Council Recommendation on building bridges aims to “Strengthen mutual trust through external quality assurance and accreditation of joint educational programmes and other forms of joint educational offers developed by institutional transnational cooperation models, including ‘European Universities’ in accordance with the European Standards and Guidelines for quality assurance in the European higher education area”. To achieve this, it recommends a move towards the use of institutional-based external quality assurance. The move towards such system is reviewed in this section, based on a survey on the implementation of the 2022 Council Recommendation on building bridges carried out by the European Commission in 2023, where national authorities self-assessed the situation in their country; second, information from EQAR, which uses a range of data sources,

⁶⁴ ESG p.7. https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

⁶⁵ Ibid.

⁶⁶ EQAR was founded by the ENQA, ESU, EUA and EURASHE, together with government members.

⁶⁷ London Communiqué, 2007:4

⁶⁸ Scukanec Schmidt, N., Skledar Marijevic, A. and Anic, Z. (2023) Linking quality assurance and the social dimension of higher education. Literature review and mapping national practices. NESET Report, Luxembourg, Publications Office of the European Union. P.19.

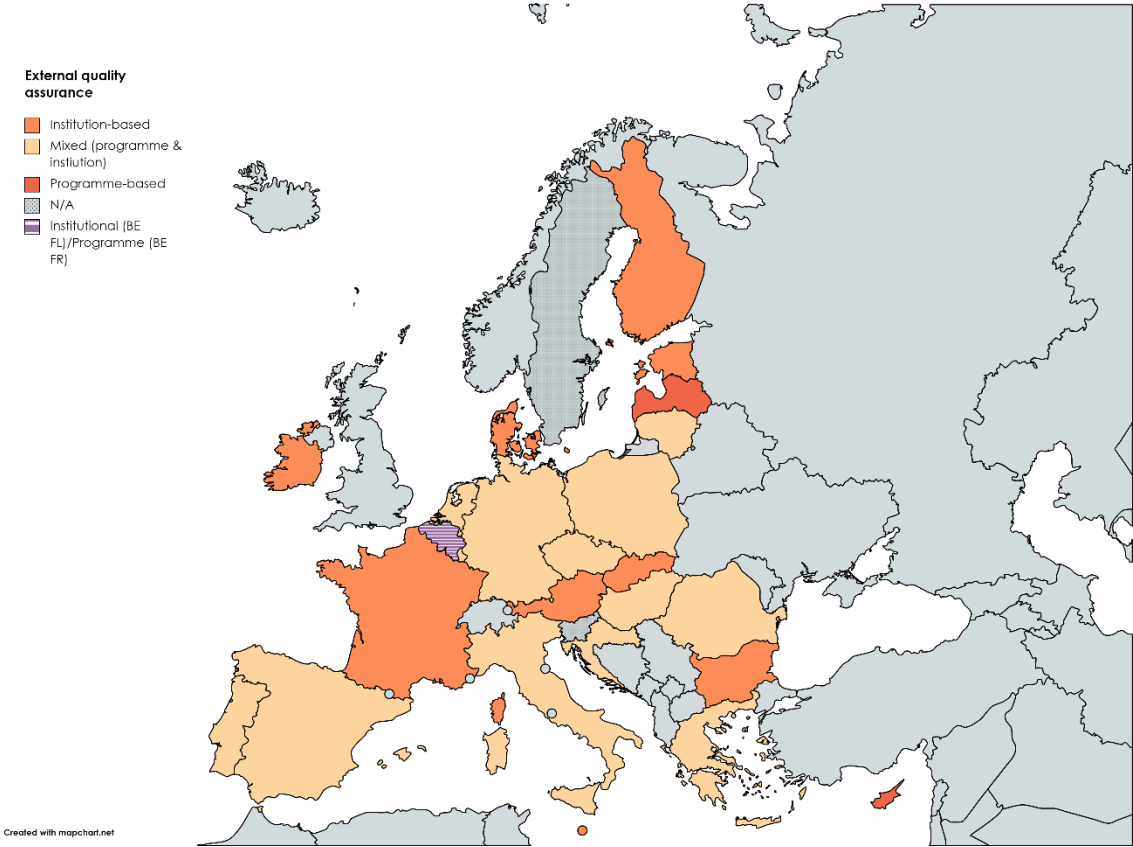
⁶⁹ Scukanec Schmidt, N., Skledar Marijevic, A. and Anic, Z. (2023) Linking quality assurance and the social dimension of higher education. Literature review and mapping national practices. NESET Report, Luxembourg, Publications Office of the European Union. P.23.

mainly documentary, to assess implementation, and third, country reports produced for this project, where national experts provided an independent assessment of countries' situations.

When institutional-based external quality assurance is in place, Recommendation Seven notes, countries can consider the possibility of allowing for self-accreditation of programmes, to underpin the self-responsibility of higher education institutions. Previous progress reports on the implementation of the 2006 Council Recommendation (2009, 2014, 2018) noted progress towards external institutional-based quality assurance. Recommendation Seven of the 2022 Council Recommendation on building bridges aimed to provide further impetus to this move.

However, even currently, only a minority of countries have transitioned to an institutional-based quality assurance system. A European Commission survey of national authorities carried out in 2023 found that external institutional quality assurance is the main form of quality assurance in nine EU national systems and a combination of institutional and programme-based quality assurance was prevalent in 14 national systems, two of which had plans to change to a more institutional-based approach: Hungary, which was planning to move towards a fully institutional system, and the Netherlands.

Figure 1. Type of external quality assurance



Source: European Commission report (2023)

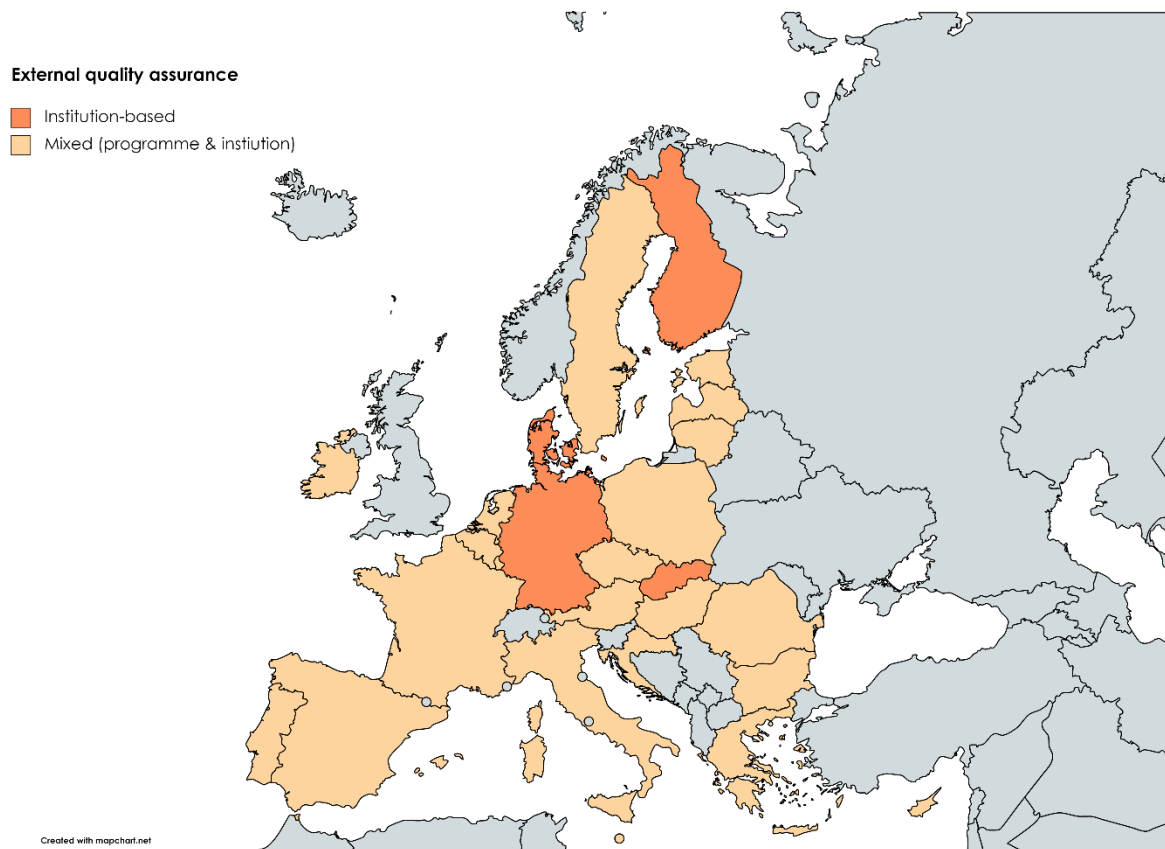
The Netherlands allows institutional-based external quality assurance for some institutions and the planned change would mean that only new programmes will be centrally accredited while institutions would handle reaccreditation. However, the Dutch expert noted that the Dutch system will not be in practice fully institutional-based because not all the institutions have signed up for the institutional accreditation (e.g. similar to Germany, where institutions can choose whether to apply for a system accreditation). According to an interview of the quality assurance agency undertaken for the present study, all the research universities, some universities of applied sciences, and one small private institution have signed up for the new procedure. Smaller institutions offer fewer programmes, and they may prefer to continue

programme-based external quality assurance than to transition towards a new system of institutional based quality assurance, with different requirements.

Three systems reported an external programme-based quality assurance system (Belgium (French Community), Latvia and Cyprus), of which the first two reported to plan to change towards a more institutional approach: Belgium (French Community) in the academic year 2024/25 and Latvia from the middle of 2026. Data for Slovenia was not available in the Commission report. The country expert for Sweden provided additional information on this country and reported that the quality assurance system is largely institutional-based, but programme evaluations are used as a complement to institutional-based quality assurance. The country expert for Slovenia noted that periodic programme reaccreditation was phased out and only initial accreditation of new programmes was retained.

Even if all the systems that reported to be transitioning towards a more institutional approach completed a full transition, around half of the national systems in the EU would have a primarily institutional-based external quality assurance approach, according to the Commission survey.

Figure 2. Type of external quality assurance



Source: Country reports

Country researchers for the present study provided a somewhat different picture regarding countries' situation, noting only four countries have an institutional-based system (Germany, Denmark⁷⁰, Finland, and Slovakia⁷¹). For example, the case of Germany –considered as a mixed system in the Commission report – was considered as an institutional-based system by the country expert as higher education institutions can choose this option: higher education

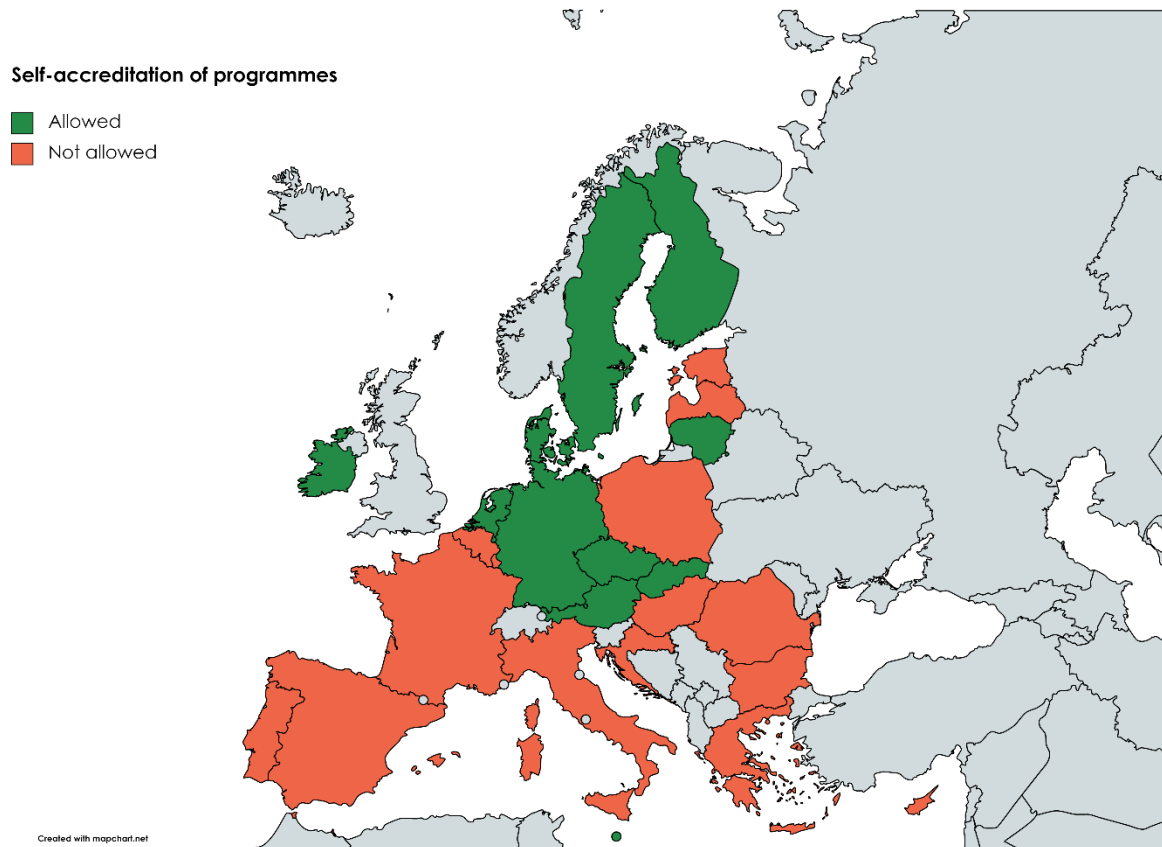
⁷⁰ In Denmark, programme accreditation is used until the HEI has achieved institutional accreditation.

⁷¹ Although Slovakia has moved to an institutional quality assurance system, the Slovak accreditation agency for higher education continues to accredit new study programmes for study fields where the higher education institution does not have the authorisation to independently create its own study programmes yet (because its internal quality assurance has not been positively assessed yet).

institutions are able to opt for a “system accreditation” at institutional level and – if successful – become self-accrediting for their programmes.

Self-accreditation allows higher education institutions to create curricula and ensure relevance and quality without formal external accreditation of each individual programme. More generally, only in a minority of countries self-accreditation of programmes is possible and linked to institutional quality assurance at least in some parts of the higher education system (some part of the Austrian higher education system⁷², Czechia, Germany⁷³, Denmark, Finland, Ireland, Lithuania, Malta, Netherlands⁷⁴, Slovakia and Sweden).

Figure 3. Self-accreditation of programmes



Source: Country reports

Further information on some of these cases is provided below:

- In Denmark, self-accreditation is possible if the programme has been subject to a positive prequalification and if the higher education institution itself is subject to a positive accreditation. In this case the higher education institution may establish new programmes and new local provisions of programmes when these have been pre-qualified and approved by the Danish Accreditation Institution, and can make adjustments to existing programmes;
- In Finland, higher education institutions are fully responsible for self-accreditation;
- In Czechia, higher education institutions that were awarded institutional accreditation within a field are authorised to approve their own study programmes within the accredited field; and

⁷² Universities that undergo regular institutional quality assurance (audits) are allowed to self-accredit their programmes.

⁷³ Self-accreditation of programs is possible in Germany for HEIs that have undergone a system-based or institutional accreditation procedure. They are enabled to self-accredit programs at their institution for a limited number of time, usually 8 years.

⁷⁴ In progress, not in place yet (foreseen for 2024).

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- A similar system applies in Malta, where the MFHEA-licensed and accredited institutions can be granted self-accrediting status.

Programme self-accreditation also takes place in non-EU countries. In the United Kingdom, for example, universities that have a Royal Charter may offer their own degrees and are as such self-accrediting⁷⁵. Self-accreditation is also possible in Brazil, where, although quality assurance is largely programme-based, the quality assurance agency Anísio Teixeira National Institute for Educational Studies and Research (INEP) allows higher education institutions to self-accredit following external quality assurance if the higher education institutions have an established ability in internal quality assurance.

As the 2018 progress report notes, the introduction of both programme and institutional external evaluations led to significant growth in higher education institutions' staff working exclusively on quality assurance, and although this freed up time and capacity of academics, it made the integration of quality assurance in the daily work of higher education institutions a challenge. The report also noted that almost half of the higher education institutions it surveyed did not have enough resources (financial or human) to meet all quality assurance requirements.

Strong points in external institutional-based quality assurance

On the whole, external institutional-based quality assurance systems combined with self-accreditation provide more flexibility for the award of joint degrees and other forms of transnational cooperation. The 2018 progress report on the 2006 Recommendation noted a consensus amongst stakeholders that institutional evaluation provides more autonomy for institutions to devise their internal quality assurance procedures based on their specific needs and contributes to building a quality culture, although quality assurance agencies were divided as to whether institutional or programme evaluations were more effective. Institutional-based quality assurance also enables an assessment of the overall quality of institutions, including their governance, management, resources, staff and support services, for example. This provides a holistic view of the quality of the institution (e.g. as stated in the Danish Accreditation Act of 2013, which marked the move towards institutional accreditation in that country), as well as consistency in quality assurance across programme areas and improves efficiency, in particular in the case of large institutions which offer a large number of programmes. Institutional quality assurance can be helpful in supporting higher education institutions in their own quality assurance procedures (e.g. as reported by Denmark and Sweden). The research conducted for the present report showed that Member States have moved towards an institutional-based approach of quality assurance, mainly to streamline the quality assurance process as well as reduce the administrative burden. For example, in Slovenia, the 2016 Higher Education Act noted the move away from programme accreditation as it had become burdensome for the quality assurance agency to assess more than 900 programmes in each evaluation cycle. In-depth institutional evaluations were introduced in Slovenia after the revision of the Higher Education Act in 2016/2017.

The above findings raise questions as to why institutional-based quality assurance is not more widely adopted. In 2018, quality assurance agencies were split into advocates of institutional and programme level approaches, and the majority (52%) reported that the greatest benefits were derived from the combination of institutional and programme quality assurance. While institutional-based quality assurance places the focus on institutional responsibility and autonomy as well as institution-wide quality management, some quality assurance agencies reported advantages in the focus that programme quality assurance provides in terms of targeting its content to teaching and learning. Respondents also highlighted the importance of context and the development stage of the national quality assurance system and higher

⁷⁵ Harvey, L. (2004-23). Analytic Quality Glossary, Quality Research International
<https://www.qualityresearchinternational.com/glossary/selfaccreditation.htm#:~:text=For%20example%2C%20the%20United%20Kingdom,tend%20to%20use%20the%20term>

education institutions in the adoption of institutional-based quality assurance, as there is a need for a certain level of maturity of the quality culture to encourage the institution as a whole to participate in quality assurance evaluations, as reported by one interviewee from Romania. Consequently, the lack of trust shared by all stakeholders in the ability of higher education institutions to assume responsibility for quality of programmes completely by themselves limits the shift to (exclusively) institutional-based external quality assurance. As quality assurance systems mature, the move towards this model should continue to increase, but stronger progress in this area is needed.

4.5 Enabling the full implementation of the European Approach

The ESG provides the bases for the European Approach for Quality Assurance of Joint Programmes⁷⁶. Joint programmes aim to facilitate cooperation and excellence in higher education⁷⁷ but are complicated to manage in part because of their need to satisfy different and sometimes incompatible quality assurance requirements in different countries where the institutions delivering the programme are based. Quality of programmes not taught in an official language of the country may face more complicated quality assurance processes. Feedback from stakeholders in the Netherlands revealed noted stricter requirements to be applied to the accreditation and quality control of programmes and courses taught in other languages than Dutch, which can potentially complicate the quality assurance of joint programmes, often taught in other languages, especially at the bachelor's or associate degree levels⁷⁸. Additionally, national quality assurance processes tend to review only the part of the programme delivered in their country, losing sight of the coherence of the entire programme and specific elements of joint programmes such as consortium agreements or arrangements for student mobility.

The European Approach, adopted in 2015, provides a common framework to address these issues in the forms of a set of standards based on the agreed tools of the European Higher Education Area: ESG, QF-EHEA, ECTS. It allows a programme consortium to undergo a single quality assurance process, based on one set of standards (based on ESG), without consideration of additional national standards and guidelines⁷⁹. In addition, it also outlines a procedure for the external evaluation of joint programmes in line with the ESG and specifies that the “programme consortium should be able to choose any available agency (from one of the participating countries or from a third country) registered in the European Quality Assurance Register (EQAR) to carry out the procedure”⁸⁰.

Given that European countries have different approaches to external quality assurance, the European Approach can be used in different ways:

Different uses of the European Approach

- 1- If all cooperating higher education institutions are subject to external quality assurance at institutional level only and have ‘self-accrediting’ status, they may use the European Approach for their joint internal approval and monitoring processes for their joint programmes (...), if they deem it useful in their context (...) in these cases no additional external evaluation or accreditation procedures at the programme level are necessary”⁸¹.

⁷⁶ https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf

⁷⁷ For a mapping of joint programmes in a range of European higher education institutions see <https://www.ed-lab.eu/d2-1>

⁷⁸ Letter of 21 April 2023 from the Dutch Minister of Education, Culture and Science to the House of Representatives on managing the influx of international students in higher education.

⁷⁹ Covering the areas of: eligibility; learning outcomes; study programme; admission and recognition; learning, teaching and assessment; student support; resources; transparency and documentation; and quality assurance.

⁸⁰ Kelo, M., Fernandez de Labastida, E., Heinze, R. and Markowski, M. (2018) Implementing the European Approach for Quality Assurance of Joint Programmes Background report.

http://impea.online/wp-content/uploads/2018/07/IO2_report_formated.pdf

⁸¹ https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf p.2

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- 2- If one or more of the cooperating higher education institutions require external quality assurance at programme level (e.g. programme accreditation or evaluation is mandatory), then the cooperating institutions should select a suitable quality assurance agency from the list of EQAR-registered agencies (...) to carry out a single evaluation or accreditation of the entire joint programme' according to the European Approach.

The 2022 Council Recommendation on building bridges recently reemphasised that countries relying on programme-based external quality assurance consider the following for joint programmes:

- enabling the full implementation of the European Approach
- external evaluation of the entire joint transnational programme can be carried out by one single agency registered in EQAR, with automatic acceptance of the outcomes in all other higher education systems concerned, without adding further national requirements; and
- ensuring that the reaccreditation of joint transnational programmes also follows the European Approach and rules of the ESG.

The requirements and conditions related to the (external) quality assurance of joint educational programmes vary across Member States. In Finland, the administrative procedures related to joint programmes appear comparatively light, because higher education institutions can self-accredit and quality assure programmes themselves, including international joint degrees. The evaluations conducted by the Finnish quality assurance agency focus on the procedures used by the higher education institutions rather than on individual programmes. Conversely, in other countries, national legislation places more emphasis on the accreditation and quality assurance of joint programmes⁸².

The scope of external quality assurance and accreditation of joint educational programmes can also vary across Member States. In some Member States, only the part of the programme delivered by the home institution is quality assured and accredited, with a recognition of external evaluations from foreign quality assurance agencies registered in EQAR for the parts of the programme delivered by partner institutions (this is the case in Poland, for example). In other Member States, the entire joint programme may be quality assured and accredited under the same procedures as for other programmes (e.g. Cyprus or Portugal). The entire joint programme may also be quality assured and accredited by the national quality assurance agency based on a separate national framework which is specific to joint programmes⁸³.

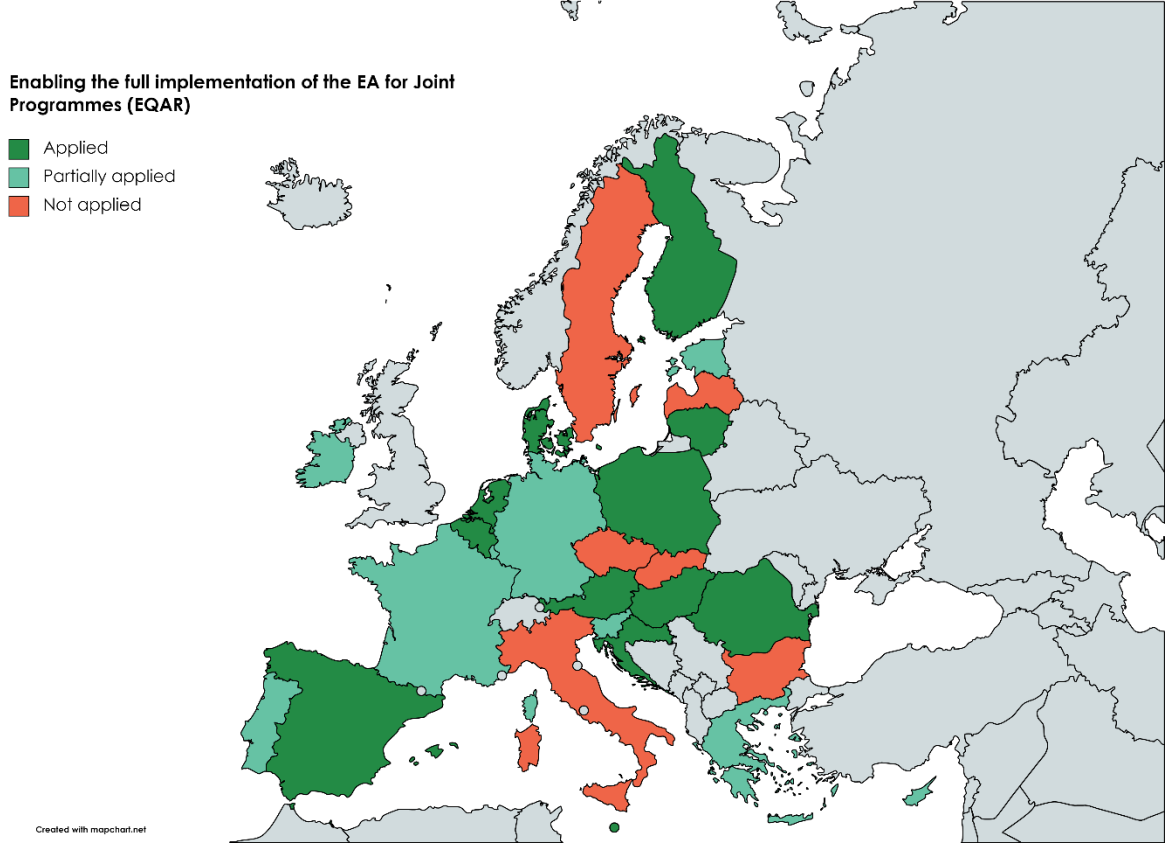
Against this backdrop, the main aim of the European Approach, adopted in 2015 in conjunction with the revised version of the ESG, is to enable all joint programmes to be subject to a single quality assurance procedure based solely on the ESG, "without applying additional national criteria". EQAR monitors the countries where the European Approach can be used by some or all higher education institutions, at their own choice and this is laid down in official documentation⁸⁴. According to EQAR data, 13 national systems allow the use of the European Approach, nine systems allow it for some institutions or under specific conditions, and six systems do not allow it.

⁸² For example, the law defines the procedure for the quality assurance and accreditation of transnational cooperation programmes in Lithuania, Poland, Portugal or Romania.

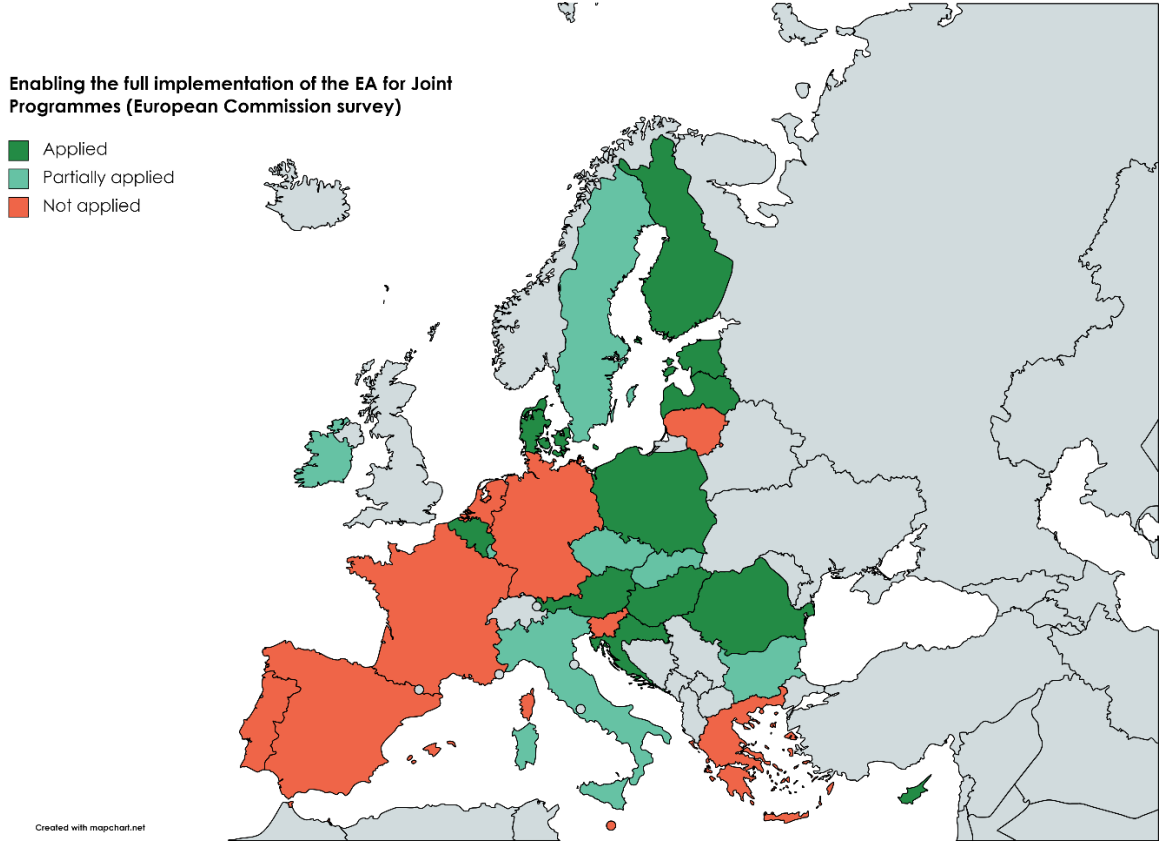
⁸³ For example, in Slovenia, the accreditation of an international joint study programme should be carried out by the Slovenian quality assurance agency when a Slovenian higher education institution intends to implement the programme together with a foreign higher education institution that is not accredited by agencies part of EQAR. For joint study programmes where all foreign higher education institutions are accredited by agencies that are listed in EQAR, the accreditation of the programme can be carried out by one of the EQAR listed agencies in line with the European Approach.

⁸⁴ <https://www.eqar.eu/kb/joint-programmes/national-implementation/>

Figure 4. Implementation of the European Approach



Source: EQAR



Source: European Commission (2023)

The 2023 European Commission survey of national authorities on the implementation of the 2022 Council Recommendation on building bridges reported that 12 systems -out of 28 due to the differentiation between the Flemish and French Communities in Belgium - allow the implementation of the European Approach, whereas 16 systems do not allow it directly (seven systems do not allow it at all and nine allow its use with additional national criteria).

The survey thus shows different results to EQAR in terms of some country situations. This may be at least in some cases due to respondents focusing on the common practice in the country, or differing interpretations of questions rather than legislative regulations.

There may also be differences in interpretation. The country reports produced for this evaluation by country researchers note that in Slovenia, the European Approach was introduced in the accreditation of joint study programme in 2016/17, however only under the condition that all higher education institutions in the consortium are accredited by an EQAR-registered agency in general. The limitations prevent the use of the European Approach in many cases where non-EU countries are involved. In the European Commission survey, this country is categorised as not implementing the European Approach, while in the EQAR database is considered as partially implemented. In Lithuania, which also shows a different score, country researchers noted that the European Approach is applied to the ex-ante evaluation of the new joint study programme, but it is not yet applied to the ex-post evaluation of entire study field, whereas in France, the European Approach can be used in addition to the Ministry's accreditation procedures (which cover two criteria not included in the European Approach: the link between training and research and preparation of professional integration) and cannot be applied in the case of reaccreditation. In Germany the European Approach can only be applied to programmes leading to joint degrees, but there are currently discussions about extending it to joint programmes leading to double or multiple degrees. In Portugal, the European Approach is available but only under specific conditions for the following programme: European Master of Medical Technology and Healthcare Business (EMMaH), Master of Science, second cycle (NQF EQF Level seven equivalent).

Belgium (Flemish Community), Greece, Cyprus and Latvia reported recent progress in the implementation of the European Approach in the European Commission survey. All these systems moved to full implementation except Greece, which moved to implementation with the use of additional criteria: the 2022 legislation (Law 4957/2022, art. 111) allows the Greek Quality Assurance Agency to certify joint international inter-university study programmes of the European Universities alliances in alignment with European Approach, although not for joint programmes outside of these. In Ireland higher education institutions are free to apply the European Approach in the self-accreditation of joint programmes. Quality and Qualifications Ireland (QQI), the national quality assurance agency, has begun planning to offer programme accreditation reviews in accordance with the European Approach, where requested to do so by an Irish higher education institution that is participating in a European Universities or similar consortium. This is especially relevant where other partner states in the European Universities alliance require an EQAR-registered agency to conduct the accreditation.

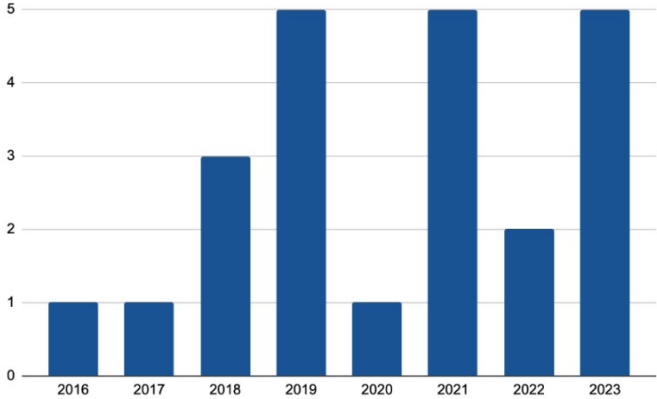
Although there are some differences between the two data sources referred to above (EQAR and the European Commission survey), both show an uneven implementation of the possibility to use the European Approach. It is important to highlight that few countries not implementing the European Approach can have a big impact. For example, Italy is in many European Universities alliances, which prevents the use of the European Approach involving all members of the alliances.

This is further reinforced when looking at data on the actual use of the European Approach. Previous Bologna Implementation Reports⁸⁵ noted limited use of the European Approach. EQAR contains information about joint programmes that have followed the European

⁸⁵ <https://www.ehea.info/Upload/BP2018.pdf>

Approach⁸⁶, based on information that registered agencies deposited in EQAR. The register contains reports for 23 programmes for the period 2016-2023. Moreover, the data does not show a marked increase in the use of the European Approach since 2019.

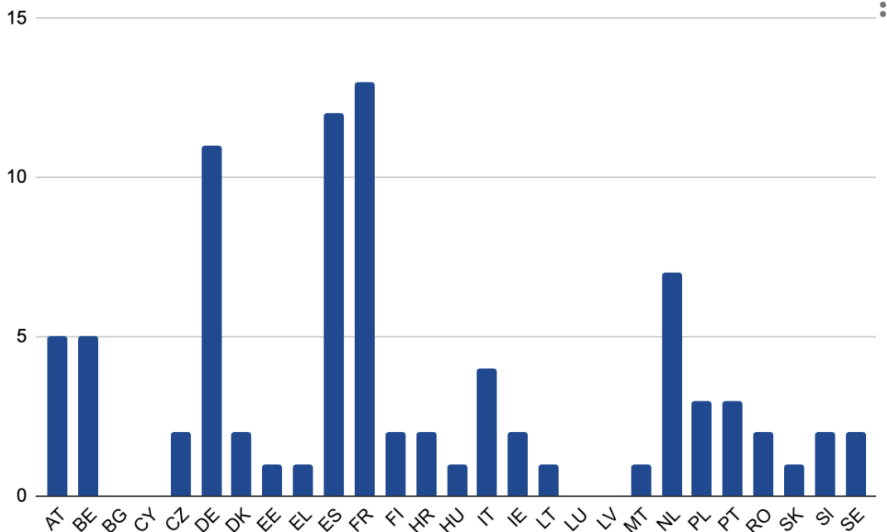
Figure 5. Joint programmes that have used the European Approach (2016-2023)



Source: Constructed from EQAR data⁸⁷

According to the EQAR data, the use of the European Approach has been particularly low at the first cycle level (bachelor’s degrees), as only three of the 23 programmes were at this level, with the remaining programmes being at the second cycle level (master’s degrees) -which can be related to the support that the Erasmus Mundus programme provides to joint Master programmes. A positive aspect is that institutions from all but four EU Member States (Bulgaria, Cyprus, Luxembourg and Latvia) were represented at least once in joint programmes that had used the European Approach.

Figure 6. Countries represented in joint programmes that used the European Approach (2016-2023)



Source: Constructed from EQAR data⁸⁸

The quality assurance agencies depositing the reports are rather concentrated, as only eight agencies had deposited at least one report at the time of writing. By far the most experienced agency is AQAS (Germany: eight reports), followed by NVAO (Netherlands and the Belgian Flemish Community: four reports) and Unibasq (Spain: three reports). These three entities thus

⁸⁶ <https://www.eqar.eu/kb/joint-programmes/european-approach-cases/> Last checked on the 10/11/ 2023.

⁸⁷ <https://www.eqar.eu/kb/joint-programmes/european-approach-cases/>

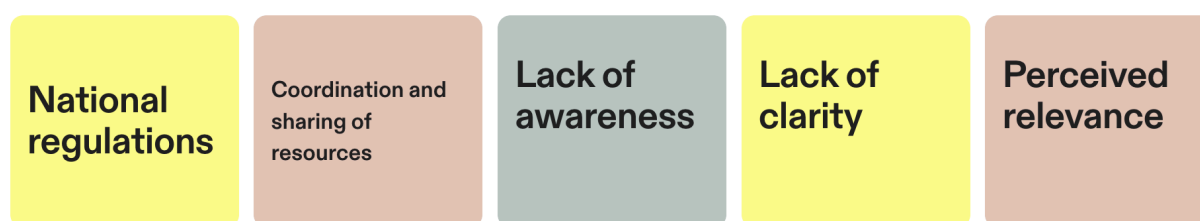
⁸⁸ <https://www.eqar.eu/kb/joint-programmes/european-approach-cases/> see also <https://www.eqar.eu/kb/joint-programmes/>

acted as agencies for more than half of the joint programmes that used the European Approach in EQAR’s database.

The country research undertaken for this study shows that only around half of EU Member States have taken some measures to promote the use of the European Approach, with Belgium (Flemish Community), Croatia, Finland, Latvia, Netherlands, Poland, Romania and Slovakia being reported as the most active countries in this respect. These measures were often found to be awareness-raising or training activities. For example, in Romania, a training session has taken place about the use of the European Approach, organised by the European Consortium for Accreditation in Higher Education. In Finland, seminars and dialogue organised by the Ministry or FINEEC are encouraging the use of the European Approach. Finnish institutional audits, being enhancement-led by definition, also provide specific support for higher education institutions to implement the European Approach. Institutional audits are also followed by interim seminars, three years after the audit, which could provide measures to support the implementation of the European Approach.

Stakeholder interviews and the experts taking part in the experts’ workshop carried out for this project showed that various obstacles to the use of the European Approach remain. These include unfavourable national regulations, difficulties around coordination and sharing of resources, lack of awareness, lack of clarity and perceived lack of relevance in some systems.

Figure 7. Barriers to the use of the European Approach



Source: Country reports, experts’ workshop, PPMI (2023)

The most prominent obstacle is the existence of different national legal frameworks and regulations, as illustrated earlier in this section, and of different quality assurance methodologies. As a result, separate national programme accreditations may still be required, each of them following different national rules, timelines and reaccreditation deadlines. National legislation may prevent the use of the European Approach and require that the accreditation decision by a foreign agency be approved by the national quality assurance agency –see next section- or meet very specific requirements (e.g. in terms of course staffing) that may not be consistent with practices or regulations in other countries. In the Netherlands, an interviewee from NVAO pointed out the potential resistance to introducing a European degree or accreditation. This resistance is anticipated because national governments, having invested in education, are reluctant to be more distant from overseeing the quality control of programs within their system.

Coordination and sharing of resources can also represent a barrier to the implementation of the European Approach. More specifically, in France, according to the country research, the use of the European Approach can be challenging due to issues related to timing, sharing of costs and resources, and coordination problems.

Country research undertaken for this study also noted that the European Approach, and its benefits⁸⁹, are not always well known amongst institutions. For instance, in Belgium (French Community) the European Approach can be used, as higher education institutions running international joint programmes can request the national quality assurance agency (AEQES) to recognise external evaluations conducted by other agencies; however, according to the

⁸⁹ See also PPMI (2023) ‘The road towards a possible European degree: identifying opportunities and investigating the impact and feasibility of different approaches’ Luxembourg, Publications Office of the European Union.

country researcher, it is still sparsely used and insufficiently known among higher education institutions⁹⁰. This is consistent with results from the 2018 progress report which additionally noted that around a third of respondents to their survey of higher education institutions were not familiar with the European Approach, that some higher education institutions were not sufficiently clear about the European Approach and its requirements, and that they did not differentiate it from the ESG⁹¹. The confusion around the meaning and national definitions of a joint programme/joint degree/double degree/multiple degree⁹² has also contributed to difficulties in implementing the European Approach, which specifically refers in its name to joint programmes. Calls have been made for the alignment of these definitions for the effective implementation of a possible European degree too⁹³.

Lack of clarity and awareness extends to the benefits of the European Approach. Previous research has argued that lack of good practice examples makes it harder for institutions what the approach means in practice and why they should engage in it⁹⁴, although this is most likely related to lack of awareness of those good practice examples, as a number of them exist and are in progress, and of the benefits brought about by the European Approach.

Finally, previous research has noted that the European Approach is not seen as relevant in countries where there is no requirement for programme-level accreditation⁹⁵. Since programme accreditation is widespread in Europe, making it likely that among the partners implementing joint programmes some will require programme-level accreditation, this perceived unusefulness does not take into consideration the usefulness of using the standards of the European Approach in the internal quality assurance processes of self-accrediting institutions.

It is interesting to note that country researchers reported relevant policy documents and/or guidelines and initiatives for the quality assurance and recognition processes for joint programmes being developed specifically by the European Universities alliances. These documents and guidelines are mostly at the level of individual alliances. For instance:

- In Belgium (Flemish Community), the University of Louvain has developed the “Circle U. Quality assurance guidelines and rules to develop joint learning activities and programmes”, which is largely inspired by European texts. The European Approach functions as the basis of the alliance’s quality assurance work⁹⁶.
- In France, another example of such initiatives is the paper developed by Una Europa: (Paris 1 Panthéon-Sorbonne) - Quality Assurance in the context of a European University: a lean and trust-based approach for joint programmes⁹⁷. This paper presents a quality assurance approach for joint programmes which has been developed by the Una Europa alliance. The approach is based on the principles of verified trust, subsidiarity and core practices. From this follows a need for accountability and transparency. To ensure transparency, the partners share information on their internal quality assurance methods in a ‘knowledge base’.

The approach to quality assurance of other European Universities alliances such as YUFE and EUniQ is reviewed in section 7.4.4.2.

⁹⁰ In Belgium (Flanders), the EA is mandatory for all new joint programmes.

⁹¹ In Italy, joint programmes do not exist due to the national law.

⁹² European Commission, European Education and Culture Executive Agency (2020) Implementing joint degrees in the Erasmus Mundus action of the Erasmus+ programme, Publications Office.

⁹³ PPMI (2023) ‘The road towards a possible European degree: identifying opportunities and investigating the impact and feasibility of different approaches’ Luxembourg, Publications Office of the European Union.

⁹⁴ Ibid. See also Kelo, M., Fernandez de Labastida, E., Frederiks M., Heinze, R., and Markowski, M.,(2018). Implementing the European Approach for Quality Assurance of Joint Programmes. Background report. Brussels.

⁹⁵ Ibid. See also Kelo, M., Fernandez de Labastida, E., Frederiks M., Heinze, R., and Markowski, M.,(2018). Implementing the European Approach for Quality Assurance of Joint Programmes. Background report. Brussels.

⁹⁶ [d1.8_circle-u-quality-assurance-policy.pdf](#)

⁹⁷ <https://una-europa.imgix.net/resources/7.18-Publication-QA-in-context-of-European-University.pdf>

4.5.1 Reaccreditation follows the rules of the ESG and the European Approach

Regarding reaccreditation, in 18 higher education systems the reaccreditation of joint national programmes follows the rules of the ESG and the European Approach (Austria, Belgium (Flemish and French community), Bulgaria, Croatia, Cyprus, Denmark, Germany, Estonia, Greece, Finland, Hungary, Lithuania, Latvia, Netherlands, Poland, Romania and Sweden). In six systems additional criteria are applied (France, Italy, Luxembourg, Portugal, Slovakia and Spain), and in three systems the reaccreditation process does not follow the ESG and the European Approach (Czechia, Ireland, Slovenia). Information for Malta was not reported in the European Commission survey. Data from the country research for the present study noted that in that country the Malta Further Higher Education Authority (MFHEA) is legally obliged to recognise accreditation decisions made by agencies within EQAR or which have, in their accreditation, abided by the ESG.

Data gathered from country researchers sometimes diverged from the European Commission survey. The reaccreditation of joint transnational programmes following the rules of the ESG and the European Approach was reported to take place in a quarter of Member States (Austria, Belgium (Flemish and French Communities), Croatia, Germany, Estonia, Latvia, Romania and Slovenia). Six Member States were reported to partially follow the guidance suggested by the ESG or the European Approach, meaning that they do not apply both (Bulgaria, Czechia, Finland, Lithuania, Malta, Netherlands). For example, Bulgaria was reported to be partially compliant with this element of the 2022 Council Recommendation because reaccreditation follows the rules of the ESG since these are embedded in the National Evaluation and Accreditation Agency's regulations for accreditation procedures, but the European Approach by itself is perceived as too general to ensure quality and more specific requirements are included in national regulations. In Lithuania, it was reported that the accreditation procedure of joint programmes is in alignment with the ESG but does not follow the European Approach.

4.6 Thematic focus of quality assurance

Quality assurance can cover different themes. The ESG focuses on quality assurance related to learning and teaching in higher education. Its 2015 update expanded the focus of the previous ESG to incorporate various new elements in learning and teaching, such as student-centred learning and greater emphasis on learning outcomes. The 2018 progress report noted greater attention being given to these issues in quality assurance processes since the adoption of the 2015 ESG, although it also noted various remaining limitations (e.g. insufficient consideration of student-centred teaching in career progression pathways, or the limited assessment that quality assurance agencies make on how learning outcomes are taught and assessed, and not only stated in the description of study programmes¹⁹). There is thus a case to retain these elements as important components of future developments in quality assurance.

However, there are also discussions on whether other topics should be incorporated more centrally in a potential European quality assurance and recognition system⁹⁸. These include:

- internationalisation and recognition, which are strongly linked with quality assurance in the European Education Area agenda for higher education (ensuring, for example, that international degrees are trusted and do not hinder student mobility, and that staff achievements in this area are reflected in staff promotion policies); this trend has accelerated with the development of European Universities alliances and the discussions around a possible European degree;
- widening access, consistent with the focus of the European Education Area on equality and inclusion (e.g. reviewing the quality of higher education institutions' recruitment and widening participation policies – introduction of flexible pathways, recognition of prior learning and credit transfer, etc.);

⁹⁸ European Commission Progress Report 2014; 2018, stakeholder interviews

- achievement, consistent with the focus of the European Education Area on quality (e.g. looking at policies to monitor completion, support services to prevent drop-outs – for example through mentoring, guidance, counselling, mental health or financial services- or systems to track student progress, identify risks and take preventive measures);
- authenticity and academic integrity, linked to the focus of the European Education Area on quality⁹⁹ (e.g. first, given heightened concerns with academic integrity and misconduct given expanded availability of generative artificial intelligence (AI) tools; second, the avoidance of poor-quality providers and institutions that offer or accredit fake degrees ‘degree mills’);
- employability, consistently with the focus of the European Education Area on quality, and explicit calls in the 2022 Council Conclusions on a European strategy empowering higher education institutions for the future of Europe (e.g. through the monitoring of policies around employer involvement, transversal skills development, work-based learning opportunities such as placements or graduate tracking);
- lifelong learning and non-traditional ways of provision, also an important component of the European Education Area (such as Massive Open Online Courses – MOOCs); this focus on non-traditional ways of provision has increased with the expansion of micro-credentials; and
- the green and digital transitions, both central topics of the European Education Area (e.g. in terms of ensuring that students acquire the relevant knowledge, skills and competences).

4.7 Micro-credentials and lifelong learning

The 2009 report on progress in quality assurance in higher education¹⁰⁰ noted that, overall, continuing education and lifelong learning qualifications and distance and online education have remained largely outside the scope of quality assurance. A rapid expansion and diversification of non-traditional programmes, which aim to attend to the needs of diverse learner profiles, interests and motivations, has taken place since that report. The number of MOOCs in major platforms such as Coursera, edX and FutureLearn has been estimated at around 20,000, reaching over 220 million learners globally, excluding China¹⁰¹, and that the number of MOOC based micro-credentials provided through these main platforms alone exceeds 2,900 to which those from other platforms, as well as non-MOOC based micro-credentials, need to be added. Moreover, there are growing debates on the recognition of micro-credentials (in terms of their stackability and portability) and the proliferation of providers, all of which has led to increasing interest in the quality assurance of micro-credentials¹⁰².

The 2022 Council Recommendation on a European Approach to micro-credentials for lifelong learning and employability¹⁰³ notes that that micro-credentials should be underpinned by quality assurance following agreed standards. The Recommendation encourages Member States to support the quality and transparency of micro-credentials, where appropriate, through the application, adaptation, and development of quality assurance mechanisms for them, issued by different types of providers, making use of existing mechanisms, wherever possible.

⁹⁹ See Blond, M. and Hackett, S. (2023) Putting the academic integrity puzzle together. European Quality Assurance Forum. University of Aveiro, 22-25 Nov. 2023. https://www.eua.eu/images/site1/events/2023/EQAF/2_Boland_Hackett_2.16.pdf

¹⁰⁰ Report from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions –Report on progress in quality assurance in higher education. COM 2009/0487 final. Available from: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2009:0487:FIN%20>

¹⁰¹ <https://www.classcentral.com/report/mooc-stats-2021/>

¹⁰² See Greere, A. and Fox, L. (2023) Designing micro-credentials to respond to European Quality Assurance Expectations. European Quality Assurance Forum. University of Aveiro, 22-25 Nov. 2023 https://www.eua.eu/images/site1/events/2023/EQAF/1_Greere_Fox_2.08.pdf

¹⁰³ Council Recommendation of 16 June 2022 on a European approach to micro-credentials for lifelong learning and employability (2022/C 243/02). Available from: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627\(02\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627(02))

European cooperation on quality assurance of micro-credentials, the Recommendation notes, will help to build reciprocal trust.

The importance of strong quality assurance for micro-credentials is further reflected in the European principles for the design and issuance of micro-credentials laid out in this Council Recommendation, as several of these refer to quality assurance (those on quality, transparency and learner-centredness). These principles explain that micro-credentials should be subject to internal and external quality assurance by the system producing them (e.g. the education, training or labour market context in which the micro-credential is developed and delivered). These quality assurance processes must be clearly documented and accessible and meet the needs of learners and stakeholders.

Moreover, external quality assurance should be based primarily on the assessment of providers (rather than individual courses) and the effectiveness of their internal quality assurance procedures. Providers, on the other hand, should make sure that internal quality assurance covers the overall quality of the micro-credential itself (considering standards such as those outlined in the EQF Recommendation and the ESG); the quality of the course leading to the micro-credential; learners' feedback on the learning experience and peers' feedback - including other providers and stakeholders. Learners should thus be involved in the internal and external quality assurance processes and their feedback be considered as part of the continuous improvement of the micro-credential.

Specific approaches to quality assure micro-credentials are still relatively rare in the EU. Ireland was the first EU Member State to have established a coherent National Framework for quality assured and accredited micro-credentials, as described in box 4.2.

MicroCreds, Ireland's national framework for the quality assurance of micro-credentials

Ireland has set up a national framework for the quality assurance of micro-credentials through MicroCreds¹⁰⁴, a 5-year, €12.3 million project (2020-2025) led by the Irish Universities Association (IUA) in partnership with seven of the founding IUA universities: University College Dublin, University College Cork, University of Limerick, Trinity College Dublin, Dublin City University, University of Galway and Maynooth University. They are assisted by an Enterprise Advisory Group composed of members from business representative organisations at the national level, enterprise agencies, private sector companies and state bodies with responsibility for skills.

The project is funded by the Higher Education Authority HEA and includes collaboration from businesses who are provide advice through an Enterprise Advisory Group. The programme targets learners who are seeking to upskill, reskill, return to employment or change careers. The framework for the project follows the 2022 European Council Recommendation for a European Approach to Micro-Credentials for Lifelong Learning and Employability.

All MicroCreds micro-credentials are accredited by the university delivering the course. They have a credit range between 1-30 ECTS, dependent on the specific micro-credential. They are typically delivered on a part-time basis online or through blended learning. For example, see the range of courses offered by Trinity College Dublin¹⁰⁵. Over 300 university accredited micro-credentials have been launched and more will be added as they are developed.

It should be emphasised that the infrastructure in Ireland for micro-credentials (previously known as small qualifications) is well established, see QQI early exploration into Micro-credentials in Higher Education, 2014-2020¹⁰⁶.

¹⁰⁴ <https://www.iua.ie/ourwork/learning-teaching/microcreds/microcreds-project-overview/>

¹⁰⁵ <https://www.tcd.ie/courses/search/?keywords=&type=Micro-credentials>

¹⁰⁶ <https://www.qqi.ie/sites/default/files/2021-10/early-exploration-into-micro-credentials-in-higher-education-2014-20.pdf>

Approaches to quality assure micro-credentials are also currently being worked on in various countries, including Belgium (Flemish Community), Czechia, Finland, Luxembourg, the Netherlands and Spain.

- Participation in European exchanges and the Microbol¹⁰⁷ project have encouraged the development of national approaches in the Belgian Flemish Community, Luxembourg and the Netherlands. The Microbol project was coordinated by the Flemish Ministry and aimed to explore whether and how the existing European Higher Education Area tools can be used or need to be adapted to be applicable to micro-credentials.
- In Czechia, micro-credentials are included as one of the activities covered by the National Recovery Plan. No national guidelines regarding the quality assurance of micro-credentials exists of yet. Micro-credentials are seen as short study programmes, and their quality assurance is therefore the same as for study programme, and a competence of individual universities. The accreditation and quality assurance of micro-credentials runs through a Council of internal evaluation located in each university, and these deal with micro-credentials in different ways. For example, Charles University uses the same quality assurance systems for micro-credentials and other study programmes, whereas Masaryk University has different quality standards based on the number of credits of qualifications¹⁰⁸.
- A pilot to quality-assure micro-credentials is also planned in Finland in 2026, to be included in a new institutional audit model due to be launched in 2027¹⁰⁹. Micro-credentials currently fall under higher education institutions' quality assurance processes of study programmes and courses, and foreign micro-credentials are assumed to be accredited by the coordinating member institution or EQAR-recognised agency in Finland¹¹⁰.
- In Spain, the Quality Assurance Agency for higher education, ANECA, has produced a protocol for the evaluation and quality assurance of micro-credentials.

Country researchers also noted that national authorities in other Member States (Croatia, Greece, France, Poland, Romania) have made efforts to quality assure or accredit micro-credentials, although some of these efforts seem to be more focused on vocational and adult education and training than higher education. For example, in France, there is an ongoing debate regarding the quality assurance of micro-credentials¹¹¹ which currently do not appear to be accredited by the State in higher education. Nevertheless, micro-credentials can be quality assured through *France Compétences*; the national agency for professional training and apprenticeships. Romania's recent Higher Education law of September 2023 specifies the need to quality assure micro-credentials issued by higher education institutions, but does not provide substantial details in this regard.

In many other national systems, micro-credentials do not represent the object of specific quality assurance efforts in higher education. This is because some national authorities include micro-credentials in standard quality assurance guidelines *de facto* – as is the case in Malta, where

¹⁰⁷ <https://microcredentials.eu/about-2/microbol/>

¹⁰⁸ Interview, Karlova University, 25 July 2023

¹⁰⁹ Interview, Finnish Quality Assurance Agency FINEEC/KARVI22 August 2023.

¹¹⁰ The Finnish Ministry focuses on the issue of quality assuring micro-credentials issued by business or by collaborative efforts of HEIs and their business partners (Oral communication during PLA 23 May 2023).

¹¹¹ Euroguidance, 2022 'Micro-credentials: real innovation or fashion trend?', 17 November, URL : <https://www.centre-inffo.fr/site-europe-international-formation/actualites-europe/actualites-mediterranee-formation/micro-certifications-reelle-innovation-ou-effet-de-mode>

micro-credentials are subject to the standard programme-based review – or because they do not have a clear approach on micro-credentials yet¹¹² (e.g. Cyprus, Latvia).

Micro-credentials thus present new challenges to quality assurance, including decisions as to whether there should be subject to external quality assurance or can be reliance on internal quality assurance, and whether the ESG are applicable to them in their current or a modified form. While some countries apply or aim to apply the same quality assurance processes for micro-credentials as for other types of higher education credentials, some stakeholders interviewed for this study were of the view that this approach would be excessive given the nature of those credentials, i.e. being smaller in size, larger in numbers and more often changed. The IMINQA project¹¹³ concluded that the ESG are also applicable to micro-credentials, but that “the focus of the external quality assurance should be on the institutional approach to micro-credentials and their explicit inclusion in the existing internal quality assurance procedures, whilst the main responsibility for quality assuring them will remain with the providers. However, providers need to consider how the ESG apply to micro-credentials and their particularities.” That is, IMINQA does not recommend transposing programme-level accreditation to external accreditation of single micro-credentials. An ENQA working group on the quality assurance of micro-credentials¹¹⁴ recommended that where internal quality assurance systems have repeatedly demonstrated their effectiveness, micro-credential external quality assurance procedures test how features specific to micro-credentials are accommodated as part of these systems.

4.8 European Universities alliances

The Erasmus+-funded European Universities Initiative is a flagship initiative of the European Strategy for Universities¹¹⁵, which aims to deepen cooperation in European higher education. European Universities alliances are “transnational alliances of higher education institutions from across the EU that share a long-term strategy for deeper and sustainable cooperation in higher education, research and innovation, while promoting European values and identity, in order to significantly strengthen mobility of students and staff, and foster the quality, inclusiveness and competitiveness of European higher education”¹¹⁶. The initiative involves more than 560 higher education institutions in 64 alliances in 2024¹¹⁷. They include a broad range of higher education institutions from across the EU, from universities of applied sciences, technical universities and universities of fine arts to comprehensive and research-intensive universities. Through the European Universities alliances students can obtain a degree by combining study in several European countries. Alliances also “develop and implement an integrated long-term joint strategy for education with, where possible, links to research and innovation, at the service of society. To achieve this, they are using joint management and governance structures and are building on a shared pool of resources, including human resources, data and services, finances, administration and infrastructure”¹¹⁸.

European Universities alliances, as a new form of deeper institutional cooperation, bring about a new landscape for quality assurance, and new challenges given their different forms and levels of integration. The Erasmus+-funded EUniQ¹¹⁹ aim to provide support to quality

¹¹² Interview, ENQA 10 July 2023.

¹¹³ See https://eadtu.eu/images/IMINQA-MC-report_Approaches-to-Quality-Assurance-of-Micro-credentials.pdf p.27

¹¹⁴ See https://www.enqa.eu/wp-content/uploads/3.-WGFindings_CombinedRecPart1Part2-1.pdf

¹¹⁵ <https://education.ec.europa.eu/sites/default/files/2022-01/communication-european-strategy-for-universities-graphic-version.pdf>

¹¹⁶ EUniQ project (n.d.) Resonance Group paper: European Universities, legal frameworks and the ESG. Some Recommendations (<https://ehea.info/Upload/EUNI%20Policy%20paper%202%20Eur.%20Uni.%2C%20legal%20frameworks%20and%20the%20ESG-final.pdf> p.1

¹¹⁷ <https://education.ec.europa.eu/news/64-european-universities-alliances-now-active>

¹¹⁸ <https://education.ec.europa.eu/education-levels/higher-education/european-universities-initiative/about?>

¹¹⁹ <https://eua.eu/resources/projects/811-euniq.html>

assurance agencies in dealing with these evolving methodological challenges, by developing appropriate external quality assurance procedures on the level of the alliance. Future options for the quality assurance of European Universities alliances are reviewed later in this report, as part of the feasibility assessment (Chapter 7).

4.9 The green and digital transitions

The green and digital transitions are further trends influencing the development of quality assurance. These trends have been taken into account to different extents within quality assurance systems and processes, whereby digitalisation has been subject to more coverage and debate than sustainability. Digitalisation is affecting quality assurance as it changes the ways in which higher education institutions deliver education, as noted above in section 4.7¹²⁰, but also the way in which they deliver other services, and in which students work.

In this context, the EUA identified¹²¹ new questions that need attention around digitalisation, in the context of internal quality assurance, such as: How can online learning be used effectively to enhance quality of learning? How can digitalisation support the specific needs of a diverse student body? What kind of expertise is needed to offer online learning? Will the roles of academic and support staff need to be reconsidered? What kind of capacity building will staff and students need? In their review of the responses to challenges of the Covid-19 pandemic and the increased levels of digitalisation that this brought about, the EUA note that ‘the main principles of internal quality assurance as stated in the ESG persevered, but in many cases their scope was adapted and extended. The quality assurance of online learning needs to consider issues such as digitalisation policy and strategy, monitoring instruments, appropriateness of digital tools, online course development and structure, curricula design, digital assessment methods, data protection, privacy regulations and academic integrity, staff and student support, staff development, and building online academic communities and other online communication channels¹²².’

Moreover, in highly digitalised contexts, “the typical internal quality assurance enhancement cycle proved to be slow to react”¹²³. This happened in the context of Covid-19, but also since. For example, recent developments around chat boxes and generative AI have created new challenges for teaching, assessment, and quality assurance, spurring much debate around how to ensure academic integrity in students’ coursework and assignments. Therefore, further reflections on how, in particular internal, quality assurance processes “could be revised to allow for a swifter feedback loop and more timely reactions, is needed. A closer investigation of how the digitalisation of quality assurance processes could contribute to faster monitoring, more efficient communication on the results and consultation with the institutional community could offer some ways forward”¹²⁴. These are very recent developments that most higher education institutions and quality assurance agencies are still beginning to grapple with.

The impact that digitalisation has on the way higher education institutions operate goes hand in hand with the increasing availability of digital data and ‘digital footprints’ of the ways in which students, staff and higher education institutions operate and relate to each other. These provide a wealth of new data that can be incorporated into quality assurance processes, in real time and with a high degree of granularity. Digitalisation is thus also changing quality assurance processes themselves, for example in terms of what indicators can be used for quality assurance purposes, the periodicity of monitoring that is allowed or the way in which data

¹²⁰ See Staring, F., Brown, M., Bacsich, P., and Ifenthaler, D. (2022) "Digital higher education: Emerging quality standards, practices and supports." OECD, Paris.

¹²¹ <https://eua.eu/downloads/publications/internal%20qa.pdf>

¹²² <https://eua.eu/downloads/publications/internal%20qa.pdf> p.14

¹²³ Ibid. see also <https://eua.eu/resources/expert-voices/231:quality-led-digitalisation-and-quality-management-post-covid.html>

¹²⁴ Ibid. see also

https://www.researchgate.net/publication/361162794_Transformation_Fast_and_Slow_Digitalisation_Quality_and_Trust_in_Higher_Education

can be shared within networks of staff or institutions, and also with experts and other stakeholders.

Digitalisation can enable greater connection between databases in higher education and their integration in recognition workflows, as explored by the DEQAR CONNECT project¹²⁵. Digitalisation can even be related to more directly data-driven approaches to quality assurance that may rely less on set of pre-defined indicators¹²⁶, although the level of interactivity of existing IT tools and data systems allow varies and sometimes the patterns identified can be difficult to contextualise, understand and interpret¹²⁷. All these developments are shaped by legislation around the data that institutions are allowed to collect, manage and use or share. These are emerging trends and there is no single model or way in which digitalisation is reshaping in quality assurance processes across institutions or quality assurance agencies.

Sustainability is an aspirational goal which addresses social, environmental and economic concerns to create a better world. An important reference point in articulating sustainable development is the UN Sustainable Development Goals¹²⁸, part of the 2030 Agenda for Sustainable development. Higher education institutions have a key role in the achievement of the sustainable development goals such as addressing poverty, inequality or climate change through their teaching, operations and community leadership. Sustainability has become a central aspect for higher education institutions some of which, like the University of Helsinki, now have a Vice-Rector and Vice-Deans in its Faculties with responsibility for this area and elaborate plans¹²⁹. The UN Sustainable Development Solutions Network (SDSN) “works under the auspices of the UN Secretary-General to mobilize the world’s universities, think tanks, and national laboratories for action on the Sustainable Development Goals (SDGs) and the Paris Agreement on Climate Change; empower societies through free online education; and translate scientific evidence and ideas into solutions and accountability”¹³⁰. The Times Higher Education World University Rankings releases annual rankings that assess universities against the United Nation’s Sustainable Development Goals.

Education for Sustainable Development refers to the process of creating curriculum structures and subject-relevant content to support sustainable development. It is also related to a specific set of competencies, skills, attributes and values that higher education should try to develop across academic disciplines, such as systems thinking, anticipatory thinking, collaboration, critical thinking or integrated problem solving. Sustainable development is thus relevant to staff involved in curriculum design, and course management and delivery, senior management teams, staff with responsibility for quality assurance and enhancement, and those directing teaching and learning¹³¹.

There are various ways in which Education for Sustainable Development can be linked to quality assurance. Sustainability objectives can be included in the targets and key performance indicators in the institution’s quality assurance processes. Ensuring that Education for Sustainable Development is included in curriculum reviews and in the validation of new courses, as well as staff development, promotion and appraisal procedures are other ways in which sustainability and quality assurance can be linked.

¹²⁵ <https://www.eqar.eu/about/projects/deqar-connect/>

¹²⁶ https://www.enqa.eu/wp-content/uploads/Ulf-Hedbjork_Digitalisation-of-QA-processes.pdf

¹²⁷ See VUB (2023) Quality Assurance: Using data analysis and BI-tools to support diverse student populations. https://www.eua.eu/images/site1/events/2023/EQAF/12_Schippers_Steensels_Beckers_2.04.pdf

¹²⁸ <https://sdgs.un.org/goals>

¹²⁹ Lepisto, A. (2023) Systematisation of sustainability and responsibility work at the University of Helsinki. European Quality Assurance Forum. University of Aveiro, 22-25 Nov. 2023. https://www.eua.eu/downloads/events/8_lepisto%203.07-compress.pdf

¹³⁰ <https://www.unsdsn.org/northern-europe>

¹³¹ <https://www.qaa.ac.uk/the-quality-code/education-for-sustainable-development>

However, a recent review of the extent to which the quality assurance frameworks of countries in the European Higher Education Area support the integration of transformative learning for sustainable development in higher education¹³² has found little direct attention to those issues in most quality assurance frameworks, with the exception of the United Kingdom, where there is a guide on education for sustainable development where transformative learning is a central component. The research also identified some explicit support in three EU Member States (Estonia, Romania and Sweden), but not in other countries. It should be noted that although transformative learning for sustainable development may not be explicitly mentioned in most quality assurance frameworks many may contain opportunities around it, as is the case in France and the Netherlands, which offer guidelines and criteria for acquiring a sustainable development label.

4.10 Conclusions

This chapter has discussed key trends in quality assurance in European higher education. Quality assurance systems have evolved substantially during the period under review in this report. Internationalisation has played an important role in this process of change, with the ESG and the EQAR being two central tools for reform in a large number of cases (e.g., in Belgium (Flemish and French Communities), Cyprus, Czechia, Greece, Finland, Ireland, Italy, Latvia, Lithuania, Netherlands, Portugal, Romania, Sweden, Slovakia, Slovenia, Spain). One of the effects of the ESG has been the stimulation of the expansion in the thematic focus of European cooperation in quality assurance in higher education, as reflected in the themes covered by the ESG 2015 compared to their previous ESG version. However, the policy context and priorities of the European Education Area have made a wider set of issues increasingly relevant, and worthy of more central consideration as topics for closer cooperation in quality assurance: international cooperation, widening access, achievement and academic integrity, employability, lifelong learning and the green and digital transition. When considering a more central incorporation of additional topics into future European quality assurance initiatives, however, it will be important to consider capacity building and support for higher education institutions given previously reported strains in the resources they have available for quality assurance related activities¹³³.

Recent trends also show the growing popularity of micro-credentials for lifelong learning. While some countries apply or aim to apply similar quality assurance standards for micro-credentials as for longer higher education credentials, there are concerns that those quality assurance standards are not necessarily suitable for micro-credentials due to their small size and numerous types. The IMINQA¹³⁴ project concluded that the ESG are also applicable to micro-credentials but suggested the adoption of an institutional-based approach for the external quality assurance of micro-credentials while integrating micro-credentials into internal quality assurance within institutions and maintaining providers' responsibility for quality assurance. Transposing programme-level accreditation to single micro-credentials is not recommended by IMINQA.

Findings show that Member States are at the beginning of implementing Recommendation Seven of the 2022 Council Recommendation on building bridges. In particular, progress on the move to an institutional-based quality assurance system with self-accreditation by higher education institutions is limited. It should be noted that the Council Recommendation on building bridges is rather recent, and more time may be required for adoption.

What is more concerning is that while some countries are in transition towards the requirements of Recommendation Seven, a high share of Member States report no intention

¹³² Janssens, L., Kuppens, T., Mulà, I., Staniskiene, E. and Zimmermann, A.B., (2022) Do European quality assurance frameworks support integration of transformative learning for sustainable development in higher education?. *International journal of sustainability in higher education*, 23(8), pp.148-173.

¹³³ See European Commission Progress Report 2018.

¹³⁴ See https://eadtu.eu/images/IMINQA-MC-report_Approaches-to-Quality-Assurance-of-Micro-credentials.pdf p.27

to change their systems to align them with Recommendation Seven requirements, for example, in terms of the move towards institutional-based quality assurance systems. This might hamper European cooperation, as lack of follow-up by even a small number of countries can have a strong effect in increasing barriers to cooperation and could point to a need to further explain the rationales underpinning the Recommendation.

Moreover, the European Approach is not yet widely used. There has been uneven implementation of the possibility to use the European Approach, whereby in several systems higher education institutions are only allowed to use the European Approach under certain conditions or are not allowed to use it at all. Implementation remains hindered primarily by restrictive national legislation. There are many different national legal frameworks and regulations, but it is not clear how this diversity and specificities contribute to improve quality. Progress is also slow in terms of higher education institutions using it in practice for their joint programmes, and there has been only a slow increase in its use over time. Data from EQAR contains reports for 23 programmes using the European Approach during the period 2016-2023. A positive aspect is that institutions from all but four EU Member States (Bulgaria, Cyprus, Luxembourg and Latvia) were represented at least once in these programmes, although this also means that some EU Member States do not yet have an institution that has adopted the European Approach, as reported by EQAR data.

Given the strong support for the European Approach that we encountered during the data collection for this study, measures should be taken to overcome the barriers to its adoption identified in this chapter. This includes, in the first instance, systematically embedding the European Approach in national legislation (e.g. avoiding that separate national programme accreditations may be required, following different national rules, timelines and reaccreditation deadlines, or that the accreditation decision by a foreign agency be approved by the national quality assurance agency), but also making sure that substantive quality assurance requirements at the national level (in terms of staffing, assessment and other areas) can be made more flexible in the context of international cooperation.

Lack of implementation is also related to lack of knowledge about the European Approach, and its benefits, among higher education institutions. This points to the need for more frequent communications about the European Approach and the benefits that it can bring for international collaboration, among universities themselves, sectoral organisations, quality assurance agencies and Ministries' higher education internationalisation strategies. Lack of awareness of the European Approach may slow down the development of joint international offerings and transnational cooperation. It is important to continue with the coordination of implementation strategies, building on the sharing good practices through networking in quality assurance agencies and sectoral organisations' events. The European Commission could also consider providing additional incentives to use the European Approach in relevant funding calls, in order to stimulate its further use.

Many systems also need to put measures in place to ensure that the other elements of Recommendation Seven are implemented. This includes the external quality assurance by a single agency -see next chapter- with automatic acceptance of the assessment, and the reaccreditation of joint transnational programmes following the European Approach and the ESG.

The chapter has also shown that different interpretations of Recommendation Seven coexist, even among highly specialised experts, within national authorities, quality assurance agencies and independent experts, leading to some differences in how to measure progress and implementation and the situation of individual countries. While this has not materially affected in our view the trends observed, it is necessary to bring greater clarity to ensure there is a clear understanding what implementing the European Approach means and how they should be measured.

European Universities alliances, are a further major initiative that aims to facilitate the deepening of cooperation in higher education (e.g. joint management and governance

structures and are building on a shared pool of resources, including human resources, data and services, finances, administration and infrastructures), which has been another important development that raises new challenges for quality assurance. Future options for the quality assurance of European Universities alliances are reviewed also later on in the feasibility part of this report (Chapter 7).

Finally, the digital and green transitions are fundamental for the future of Europe, and have substantial implications for quality assurance. Digitalisation is transforming the ways in which higher education is delivered, as well as how quality assurance processes work. Digitalisation raises new question for quality assurance to address, but also provides new tools to answer those questions, and underlines the need to have agile quality assurance processes and systems, able to respond to rapid change. By contrast, the integration of the notion of sustainable development into quality assurance practices in Europe has been comparatively less robust. The extent to which the quality assurance frameworks of EU Member States support the integration of transformative learning for sustainable development in higher education is, for example, rather limited. Developments in these areas are highly dynamic and present continuously new challenges for higher education institutions and quality assurance agencies to grapple, as the rise of generative AI has recently shown.

5 The state of play regarding the implementation of the 2006 Council Recommendation

5.1 The 2006 Council Recommendation: principles and context

This section outlines the situation regarding national quality assurance practices of relevance to the 2006 Council Recommendation on further European cooperation in quality assurance in higher education. The Recommendation built on a previous Council Recommendation (98/561/EC of 24 September 1998), which encouraged Member States to support and/or establish transparent quality assurance systems. It also built on progress achieved in the context of the Bologna process, as part of which education Ministers from (at that time) 45 countries adopted the ESG.

Previous progress reports on the implementation of the 2006 Council Recommendation noted evolving external challenges for quality assurance systems in Europe²².

Table 1. Evolving external challenges for quality assurance systems in Europe since the 2006 Council Recommendation

<h3>2009</h3> <ul style="list-style-type: none">• globalisation, economic integration and increasing mobility of professionals;• increasing cross-border delivery of higher education,• the emergence of “degree mills” and fake degrees, which makes vital the identification of legitimate HE qualifications obtained abroad.	<h3>2018</h3> <ul style="list-style-type: none">• changing labour market needs (including increasing importance of digital skills, entrepreneurship) and social needs (including increasing importance of critical thinking and information evaluation in a context where radicalisation and misinformation were on the increase)• increasing importance of multi-disciplinarity and interdisciplinarity to solve complex problems• new opportunities for teaching and learning derived from the development of digital technologies
<h3>2014</h3> <ul style="list-style-type: none">• great expansion of the student population and heterogeneity of learning outcomes in HE;• expansion of HE provision global, threatening Europe's position as a world leader in HE,• aligning teaching and learning more closely with societal and labour market needs• improving and widening the delivery of HE through new technologies (e.g. MOOCs)	

Source: Progress reports 2009; 2014 and 2018.

The reports also noted persisting obstacles to mobility, the recognition of qualifications, learning outcomes obtained during periods of study abroad and to international collaboration and cooperation.

Today, many of the aforementioned trends have intensified. Work task organisation and employer demands are evolving at a faster pace than ever before, driven by rapid technological advancements¹³⁵. In the meantime, international student mobility continues to increase¹³⁶. But new challenges have also emerged. Today, the value of higher education is being questioned to an extent that was not seen before, and support for higher education can no longer be taken

¹³⁵ Pouliakas, K. and Souto-Otero, M., 2022. Setting Europe on course for a human digital transition: new evidence from Cedefop's second European skills and jobs survey.

¹³⁶ <https://www.oecd.org/coronavirus/en/data-insights/rising-international-student-mobility>

for granted. Developments in the United States provide clear evidence of this, as public confidence in higher education hit a historic low in 2023¹³⁷: higher education still is one of the most trusted institutions, but is losing ground and only around a third (36%) of Americans have either ‘a great deal’ or ‘quite a lot’ of confidence in higher education, compared to 48% in 2018 and 57% in 2015. In the UK, a recent survey¹³⁸ found that over a fifth of respondents agreed with the statement “a university degree is a waste of time”, rising to 32% among 18–24-year-olds, and 58% agreed that “a university degree does not prepare students for the real world.” Just over half of respondents believed that the advantages of getting a university degree outweigh the disadvantages. While public support for public investment in formal education remains strong in Europe, this support is slightly less pronounced concerning higher education¹³⁹. This is particularly noticeable within the context of rising costs for both students and taxpayers, and growing uncertainty surrounding the returns on investment¹⁴⁰. The European Year of Skills Eurobarometer shows that around a third of SMEs consider educational qualifications as not at all important or only slightly important when recruiting¹⁴¹.

In this environment, stakeholders ask for clear value and greater information, transparency and accountability¹⁴². Against this backdrop, quality assurance becomes a central tool for the credibility of and quality development in higher education. In this regard, the recommendations of the 2006 Council Recommendation are as follows:

Recommendations in the 2006 Council and Parliament Recommendation on further European cooperation in quality assurance

- Encourage all higher education institutions active within their territory to introduce or develop rigorous internal quality assurance systems, in accordance with the standards and guidelines for quality assurance in the European Higher Education Area (ESG)
- Encourage all quality assurance or accreditation agencies active within their territory to be independent in their assessments, to apply the features of quality assurance laid down in Recommendation 98/561/EC and to apply the ESG in their assessments. These standards should be further developed in cooperation with representatives of the HE sector and should be applied protecting and promote diversity and innovation
- Encourage representatives of national authorities, the higher education sector and quality assurance and accreditation agencies, together with social partners, to set up a ‘European Register of Quality Assurance Agencies’ (European Register) based on national review, that takes account of the principles set out in the Annex, and to define the conditions for registration and the rules for management of the register;
- Enable higher education institutions active within their territory to choose among quality assurance or accreditation agencies in the European Register an agency which meets their needs and profile, provided that this is compatible with their national legislation or permitted by their national authorities;
- Allow higher education institutions to work towards a complementary assessment by another agency in the European Register, for example to enhance their international reputation;

¹³⁷ <https://news.gallup.com/poll/508352/americans-confidence-higher-education-down-sharply.aspx>

¹³⁸ <https://upp-foundation.org/wp-content/uploads/2023/02/UppF-HEPI-Public-Attitudes-to-HE-2022.pdf>

¹³⁹ Ibid.

¹⁴⁰ Souto-Otero, M. (2024) ‘Bringing formal and nonformal learning closer together: A reflection on crossovers in curriculum, pedagogy, assessment and learning environments’ in Pliz, M. (ed.) *Informal learning in Vocational Education and Training: Illuminating an elusive concept*. Springer.

¹⁴¹ <https://europa.eu/eurobarometer/surveys/detail/2994>

¹⁴² van Vught, F. (2021). Universities Can Regain the Public’s Trust. In: van’t Land, H., Corcoran, A., Iancu, DC. (eds) *The Promise of Higher Education*. Springer, Cham.

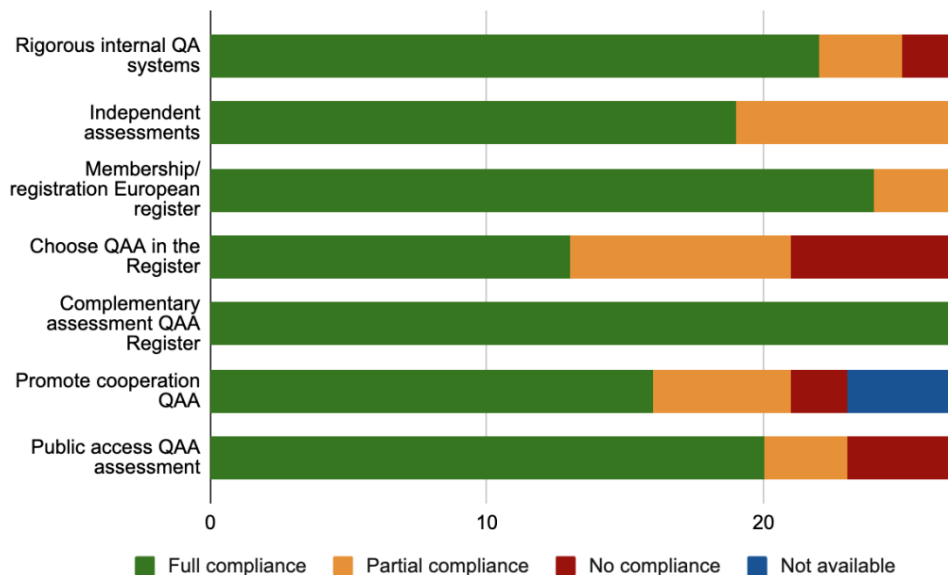
- Promote cooperation between agencies in order to build up mutual trust and the recognition of quality assurance and accreditation assessments, thus contributing to the recognition of qualifications for the purpose of study or work in another country;
- Ensure public access to the assessments made by the quality assurance or accreditation agencies listed in the European Register

5.2 Overall level of implementation of the 2006 Recommendation

This section examines the overall level of implementation of the 2006 Recommendation based on a set of classification criteria detailed in the Annexes to this report, where detailed country results are also presented. The analysis is based on country-level desk research, interviews conducted with the main national stakeholders, as well as EQAR evaluations and documentation on quality assurance systems in higher education.

Progress on the implementation of the recommendations has varied quite substantially; nevertheless, most recommendations have been fully implemented in the majority of, although not all, Member States.

Figure 8. Level of implementation of the recommendations in the 2006 Recommendation



Note: Report is on 27 Member States as data was collected separately for BE FI and Fr, but their situation was reported as equal in all recommendations.

Seventeen years after the adoption of the Recommendation, only one of its individual recommendations has been fully implemented in all EU Member States: allowing higher education institutions to work towards a complementary assessment by another agency in the European register. Given that this specific recommendation did not require legislative changes in most, if not all Member States, this level of implementation is unsurprising. A good level of implementation has been achieved in relation to the introduction of rigorous internal quality assurance systems in accordance with the ESG and membership and registration in the European register. All but four Member States have internal and external quality assurance systems that are aligned with the ESG, evidenced by EQAR registration of the agencies performing external quality assurance¹⁴³. Lower degrees of implementation were reported in relation to higher education institutions being able to choose (EQAR-registered) quality assurance agencies from other Member States, the promotion of cooperation between

¹⁴³ See Paris Communiqué, Annex 1, <https://www.ehea.info/page-ministerial-conference-paris-2018>

agencies (although experts in some countries reported that there were not enough data to assess progress in relation to this recommendation), independence of assessments and in ensuring public access to the assessments performed by quality assurance agencies listed in the register.

As such, there has tended to be greater progress in relation to recommendations that do not explicitly require international cooperation than in relation to those that refer more directly to this type of cooperation. Implementation of the recommendation on higher education institutions being able to choose among quality assurance or accreditation agencies in the European register has been particularly sluggish.

There are also important differences in the degree of implementation by country, with slower implementation in Southern European countries, and to a lesser extent Eastern European countries, than in other groups of countries, whereas some countries were reported to have achieved full implementation of all the recommendations (e.g. Austria, Belgium, Finland, Latvia and Romania – with Luxembourg and Hungary also being rated positively in all the recommendations for which data were available for those countries).

Each of the recommendations in the 2006 Recommendation is discussed in more detail below.

5.3 Development of rigorous internal quality assurance systems

Most higher education institutions in the EU are required by law to have institutional strategies for quality improvement¹⁴⁴ and in some countries, the national law and guidelines may even require the establishment of specific indicator or organisational units, bodies or commissions at higher education institutions in charge of internal quality assurance.

The 2006 Recommendation urges Member States to specifically encourage all higher education institutions active within their territory to introduce or develop rigorous internal quality assurance systems, in accordance with the ESG. The large majority of countries have implemented this recommendation. Since the adoption of the 2006 Recommendation, Member States have been advocating for more rigorous quality assurance, for example through the creation and development of quality assurance agencies which require strong internal quality assurance systems in their evaluations. Institutions have also contributed to improving the rigour of quality assurance by setting up their own quality assurance networks.

It should also be noted that there are significant differences in the regulation of internal quality assurance between countries, as some allow greater freedom to higher education institutions (e.g. Sweden), whereas others regulate it more tightly (e.g. Czechia) or define a set of common indicators that institutions need to report on (e.g. Croatia). Furthermore, quality assurance strategies in numerous higher education institutions are often considered mere formalities, not consistently followed up by staff in their daily work. This observation was highlighted in both the 2018 progress report and stakeholder interviews conducted for the current evaluation.

In two Member States (Bulgaria and Greece), quality assurance systems were reported by country experts as not aligned with the ESG when it comes to internal quality assurance procedures.

- In Greece, a lack of adequate technical and administrative support in conducting internal assessment was reported, along with inadequate communication and collaboration with stakeholders, which remain major weaknesses in the Internal Quality Assessment Scheme (IQAS)¹⁴⁵;

¹⁴⁴ European Commission Progress Report 2018.

¹⁴⁵ ENQA Agency review Hellenic Authority for Higher Education (HAHE). See <https://www.enqa.eu/wp-content/uploads/HAHE-external-review-report.pdf>.

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- Internal quality assurance is not perceived as rigorous in Bulgaria because of a lack of standardised and rigorous quality assessment methodology compliant with the ESG, in the National Strategy for Higher Education 2021-2030.

Those national systems that were reported to be partially aligned with this recommendation faced certain limitations, such as the very limited involvement of international experts, or having parts of the higher education sector that are not subject to regular external quality assurance by an agency that has demonstrated alignment with the ESG through registration on EQAR.

In terms of future developments, increasing attention to quantitative data-driven approaches to quality assurance (including through the use of digital tools) is considered an important development in the implementation of rigorous internal quality assurance by the large majority of higher education institutions in the EU¹⁴⁶. It should be noted that quantitative approaches require agreement on the right range of indicators to be used. In some countries, like Portugal, the national quality assurance agency monitors and assesses the effectiveness of internal quality assurance systems in higher education institutions according to predefined standards and criteria.

Higher education institutions often collect quantitative data on student satisfaction, progression and drop-out rates. This is very or rather common for around 90% of institutions¹⁴⁷. But fewer institutions collect data on aspects such as the adequacy of learning resources, support services or demographic characteristics of students, all of which are relevant for ESG. The 2018 progress report identified some indicators as having high potential to lead to action: student/staff ratio, labour market outcomes (destination/salary/sector), internationalisation (e.g. share of students or staff going abroad and the share of students/ staff from other countries at the institution), equality (e.g. socio-economic disadvantage of students, gender indicators). To these, outcome indicators or students results (including by demographic characteristics) could be added.

The collection of quality indicators can produce a significant administrative burden. Thus, it must be ensured this burden is proportionate to the usefulness of the data in question. The Finnish Education Evaluation Centre's 2023 review of quality management in education clearly articulates the point that already existing information is often sufficient for quality management, but it is essential to select the most relevant information for each educational organisation¹⁴⁸.

5.4 Ensure the independence of quality assurance and accreditation agencies

The emergence of new quality assurance agencies and networks has been an important development in the European quality assurance landscape since the early 2000s. By 2009, quality assurance agencies had been established in almost all the countries of the European Higher Education Area, despite being quite heterogeneous in terms of size, scope, statute, focus and international capacity. The 2018 progress report noted that agencies operating in every EU Member State had a delegated responsibility for quality assurance. Most were reported as independent agencies, except in Slovakia and Luxembourg (which had no agency, but where the University of Luxembourg was periodically accredited by an EQAR-registered foreign quality assurance agencies¹⁴⁹). However, the 2018 progress report did not fully assess the level of independence of national agencies nor did it conclude that they were all independent in the way the ESG defines this term. Some critical voices have argued that some

¹⁴⁶ See also European Commission Progress Report 2018.

¹⁴⁷ European Commission Progress Report 2018.

¹⁴⁸ https://www.karvi.fi/sites/default/files/sites/default/files/documents/FINEEC_T1223.pdf

¹⁴⁹ The Luxembourg approach remains largely in place and is fully in line with the 2006 Council Recommendation, as it does not require each country to have their *own* agency. Similarly, the Netherlands and the Flemish community of Belgium share one agency.

governments used ‘window-dressing approaches’ and created formally independent quality assurance agencies, which *de facto* lack operational independence¹⁵⁰.

EQAR verifies national quality assurance agencies’ compliance with ESG 3.3, which states that agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence¹⁵¹. The latest available EQAR assessments were used for this study. In some countries, further measures may have been taken to improve independence of agencies since their last EQAR assessment. When no EQAR assessment was available¹⁵², the country assessment relied on other sources, including country reports.

The data shows that around a third of Member States have only partially met ESG 3.3. The independence in the assessments of quality assurance and accreditation agencies is related to various organisational and operational conditions. These include:

- a guarantee of independence from third parties (e.g. higher education institutions, governments) by law. For instance, in Finland, the Finnish Education Evaluation Centre (FINEEC) is formally independent under the law resulting from its status as defined in the Act on Finnish Evaluation Centre (Act 1295/2013);
- appointment of members. For example, the Law on Higher Education and Research of the Republic of Lithuania (LawHR) and the Centre for Quality Assessment in Higher Education (SKVC)’s statute regulate the organisation of the Lithuanian quality assurance agency, including in terms for the nomination and appointment of its members by means of open competitions, in accordance with the procedures laid down for the civil service or for employment relationships in the public sector;
- regulations preventing government from arbitrarily dismissing the management or members of an agency’s governing body. For example, the Polish national agency (PKA) was required by EQAR to undergo an earlier review after the Minister had dismissed the agency’s president without a transparent justification¹⁵³;
- financial independence from the State budget. This is the case in Portugal, apart from an initial endowment that the agency received; and
- the existence of a system of checks and balances, including an Appeals’ Committee. For example, in Estonia the agency’s independent Appeals Committees acts as part of a check and balance system, providing the Quality Assessment Councils with a consultative independent opinion on the validity of the objection submitted to the Councils.

It should be noted that independence in the nomination or selection of quality assurance agency directors or board members is approached differently across the Member States, even if the government formally signs off appointments in many cases. The 2009 Progress Report highlighted that the Austrian Accreditation Council predominantly employed foreign evaluators and did not have a majority of Austrians in the decision-making board. This practice aimed to enhance international credibility by avoiding suspicions of vested interests potentially distorting accreditation decisions. However, in some countries, greater government influence characterises appointment decisions, potentially compromising the independence of quality assurance agencies and eroding trust from other countries. For instance, in Malta, the competent ministry was reported to hold authority over the appointment of five of seven board

¹⁵⁰ Jungblut, J., Petö, A. and Stensaker, B., 2023. European values and external quality assurance. *Circlue Uni. European University Alliance, Oslo*. <https://www.circle-u.eu/about/publications/national-conferences/european-values-and-external-quality-assurance.pdf>

¹⁵¹ EQAR’s assessment is based on reviews by a panel of least four experts, which are then vetted by the Register Committee.

¹⁵² Czechia, Malta and Slovakia do not have an agency registered in EQAR agencies in these countries are not checked against ESG 3.3.

¹⁵³ See EQAR, ‘Substantive change report by Polish Accreditation Committee (PKA), article 2, 25 October, URL: 2022-11_C86_SubstantiveChangeReport_PKA_MSsBPI8.pdf (deqar.eu).

members, and the Prime Minister has the power to nominate and remove the Chairperson and Deputy Chairperson. In Poland, the government also has the capacity to exercise significant control over appointments, as the competent ministry can appoint and dismiss the President of the Committee, a power that has been exercised previously¹⁵⁴.

In Italy, the Governing Board is composed of seven members appointed by Presidential Decree, upon the proposal of the Minister of Education and Research, although these are selected from a shortlist drawn up by a technical committee¹⁵⁵. In Greece, the President of the Supreme Council of the Hellenic Authority for Higher Education (HAHE) is appointed by decision of the council of ministers of the Greek government. The five members of the Supreme Council are appointed as a result of an open call for applications and following an established evaluation procedure¹⁵⁶.

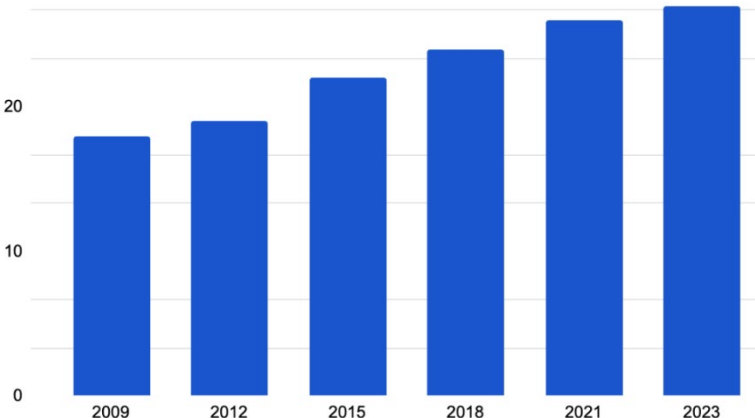
In other countries (e.g. Spain, France), the directors are selected by the board of the quality assurance agency, which may include politicians or members directly designated by political parties. However, this only concerns a few board members. In the case of France, only two of the 30 members of the board of the High Council for Evaluation of Research and Higher Education (Hcéres) are also members of parliament.

5.5 Set up a quality assurance register (EQAR)

The quality assurance infrastructure has developed significantly since the 2006 Council Recommendation. Following the creation on ENQA in 2000, the European Quality Assurance Register (EQAR), a major new body in European quality assurance, was created in 2008, in line with the principles set out in the 2006 Recommendation. Countries are members of EQAR, while quality assurance agencies that demonstrate their alignment with the ESG can be included in EQAR's Register.

EQAR governmental membership has been growing progressively since the setup of the organisation in 2008, and EU Member States' membership was completed in 2023 with the incorporation of Sweden.

Figure 9. Evolution in current EU Member States' EQAR membership (2009-2022)



Source: Collected from EQAR annual reports. Country details: 2009: Austria, Belgium, Bulgaria, Cyprus, Germany, Denmark, Estonia, France, Hungary, Ireland, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania; Slovenia, Spain. 2012: Croatia, Latvia new members, Hungary not in the list. 2015: the Czech Republic, Finland, Lithuania new members; 2018: Greece and Italy new members; 2021: HU and SK new members. 2023: Sweden new member.

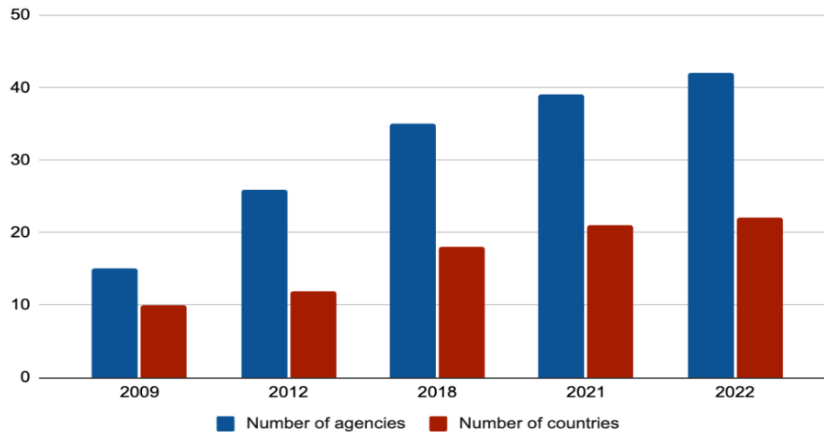
¹⁵⁴ See EQAR, 'Substantive change report by Polish Accreditation Committee (PKA), article 2, 25 October, URL: 2022-11_C86_SubstantiveChangeReport_PKA_MSsBPI8.pdf (deqar.eu).

¹⁵⁵ https://www.anvur.it/wp-content/uploads/2023/10/ANVUR_Organisation-and-Functioning-Regulation-2022_upd-1.pdf
https://www.anvur.it/wp-content/uploads/2023/07/4.-DPR-76_2010.pdf

¹⁵⁶ <https://www.enqa.eu/wp-content/uploads/HAHE-external-review-report.pdf>

The number of countries which have a quality assurance agency registered with EQAR has also increased. In 2009, 15 quality assurance agencies from 10 different Member States were registered. Today, relevant authorities from all Member States are EQAR members, and most Member States have national agencies included on the register¹⁵⁷.

Figure 10. Evolution in the number of quality assurance agencies from EU Member States' (EQAR registered) and number of EU Member States they represent



Source: Collected from EQAR annual reports. Data for 2015 not included due to different reporting format.

However, some Member States (Czechia, Italy, Malta and Slovakia) are governmental members, but do not have a national quality assurance agency registered with EQAR. The National Agency for the Evaluation of the University and Research Systems (ANVUR) expects to be registered with EQAR in the course of 2024 according to an interview carried out with this agency. In addition, the quality assurance agency in Malta has made efforts towards alignment by developing the Malta Quality Assurance Framework based on the ESG and by enhancing transparency and stakeholder involvement in the Quality Assurance Committee and Board.

5.6 Enable higher education institutions to choose among quality assurance or accreditation agencies in EQAR

5.6.1 General situation

Higher education institutions by and large agree that external quality assurance enables them to demonstrate progress in quality¹⁵⁸. The 2006 Recommendation asks that higher education institutions in Member States are allowed to choose among quality assurance or accreditation agencies in the EQAR, provided this is compatible with national legislation or permitted by national authorities. This was also one element of the rationale for the setting up of the EQAR. Realising this recommendation also requires that higher education institutions have autonomy to apply for an international assessment, that the international agency is willing and allowed to

¹⁵⁷ Membership is not to be confused with being listed on the Register: all EHEA countries can become governmental members of EQAR (and most are, see [Members - EQAR](#)), but only a quality assurance agency that has evidenced its alignment with the European Standards and Guidelines (ESG) and has successfully applied for inclusion will be on the register but may not be a member. See [Members - EQAR](#). Member States such as EL, IT, MT, CY and SK are governmental members, but their national agencies are not on the register. In Italy, what is hampering EQAR registration is that higher education in music and the arts is not fully compliant with the European Standards and Guidelines for quality assurance in the European higher education area because it is still lacking a quality assurance framework, however some progress has been accomplished and ANVUR expects to become registered on EQAR after the next visit foreseen for January 2024, Quality Assurance Framework based on the European Standards and Guidelines for quality assurance in the European higher education area s and by enhancing transparency and stakeholder involvement in the Quality Assurance Committee and Board.

¹⁵⁸ European Commission Progress Report 2018.

operate outside its national borders, and that national authorities or quality assurance agencies acknowledge registered agencies from other countries and recognise their decisions. The main motivations to be quality assured by a foreign agency are related to prestige, a wish to demonstrate international openness, preference for the approaches or methodologies used by that agency (the institution considers that the foreign agency has clearer appeal systems, for example), or because they can provide a fresh perspective on ways to improve quality.

This specific recommendation remains implemented only partially. According to the 2014 progress report, six systems (Austria, Belgium Flanders, Bulgaria, Lithuania, Poland and Romania) allowed their higher education institutions to work with foreign registered agencies for regular evaluation, audit or accreditation. This has now increased to national authorities in 13 systems (with the addition of Cyprus, Germany, Finland, Hungary, Luxembourg, Latvia, and Slovakia), showing progress in this regard over the last decade¹⁵⁹.

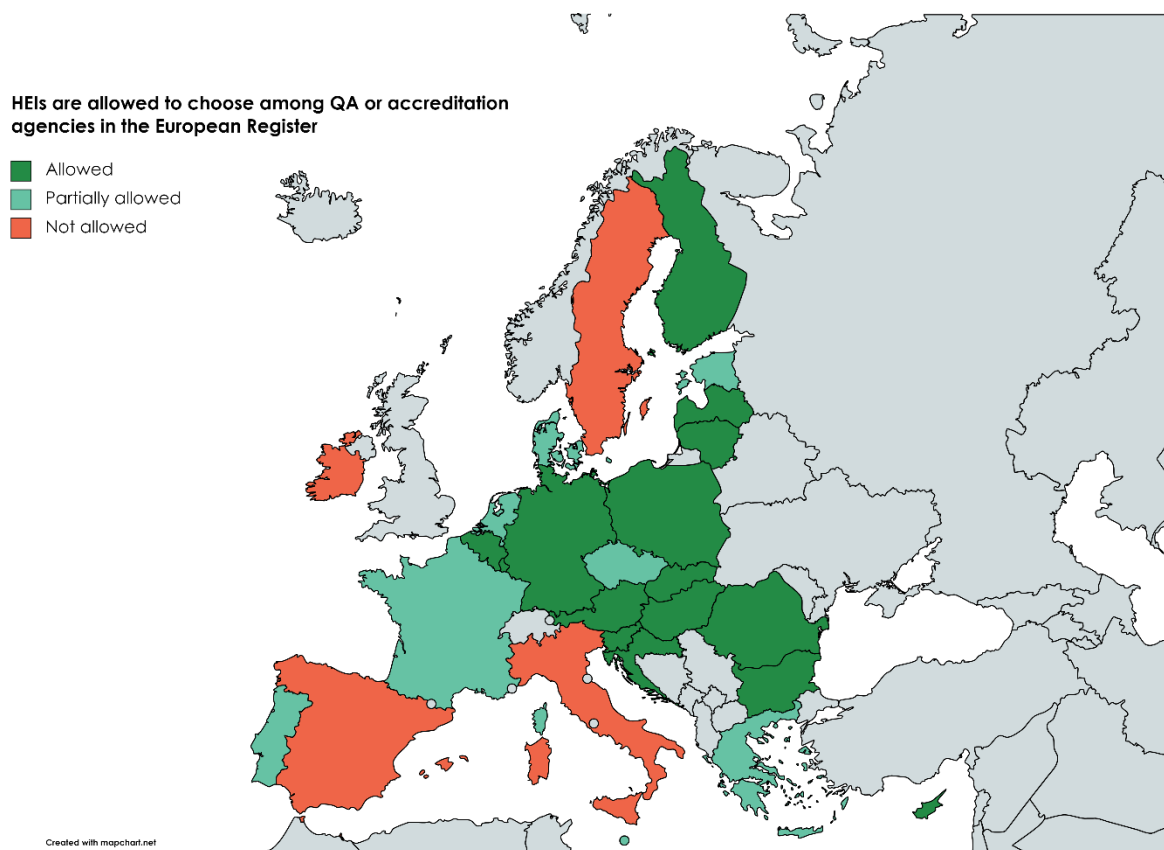
In a further eight systems, national requirements influence the recognition of EQAR-registered agencies for external quality assurance performance (Czechia, Denmark, Estonia, Greece, France, Malta, the Netherlands, and Portugal):

- In Estonia, higher education institutions can request an evaluation by another accreditation agency member registered on EQAR, but this agency must have institutional evaluation experience. The Estonian quality assurance agency Estonian Quality Agency for Education (HAKA) has to approve the use of the foreign agency.
- In France, the quality assurance agency Hcéres can validate evaluations carried out by other agencies, provided that the procedures used by other agencies meet certain conditions, including alignment with the ESG and pending the higher education institution notifying Hcéres that another agency will be used.

Higher education institutions in other countries cannot choose among quality assurance agencies registered in EQAR and the national quality assurance agency is the only body entitled to carry out evaluations and accreditations as part of the obligatory external quality assurance requirements, even if EQAR agencies may operate in the Member State for additional, voluntary reviews.

¹⁵⁹ See <https://www.ehea.info/Upload/BP2018.pdf> p. 140.

Figure 11. Overview of Member States position towards EQAR agencies



Source: Country reports

Even in those countries where institutions are allowed to select a quality assurance agency in the European register to fulfil their obligatory quality assurance requirements, there are some practical barriers to this that need to be addressed that limit this option¹⁶⁰:

- Differing national higher education contexts and regulations: quality assurance procedures often require knowledge of the national context and regulations, as well as informal knowledge about what is required to meet the set standards, and it is difficult for higher education institutions to understand foreign quality assurance systems and procedures as well as those in their own country;
- Additional procedural hurdles or requirements: frequently, reports from foreign agencies need to be checked, considered and approved by a national body, which often retains the final accreditation decision¹⁶¹;
- Higher financial costs for higher education institutions: for example, external quality assurance by a national agency may be subsidised, while this may not be the case when foreign agencies are used¹⁶²;
- Distrust of foreign agencies and fears of 'agency shopping', looking for those agencies that may employ lower standards than the national¹⁶³: higher education institutions may

¹⁶⁰ See also European Commission Progress Report 2018.

¹⁶¹ In Lithuania, evaluations reports prepared and presented by the foreign quality assurance agency are discussed within internal body of SKVC – Study Evaluation Commission, and only after Commission's approval SKVC Director issues accreditation decision.

¹⁶² As reported for the case of Lithuania in the 2018 Progress Report.

¹⁶³ The 2018 progress report noted how some institutions may get a positive quality assurance result by a foreign agency after having received a negative result nationally. See European Commission Progress Report 2018.

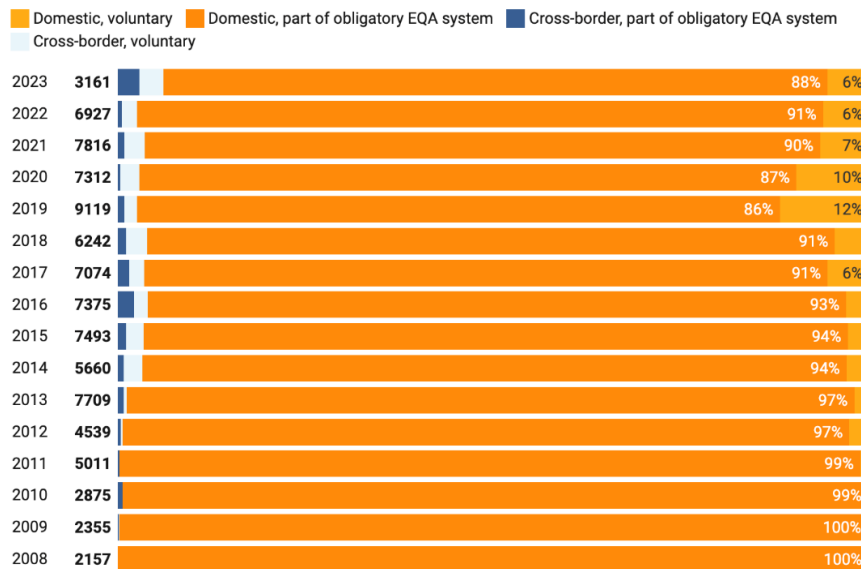
be concerned about the interpretation that will be made of their international evaluation. While a complementary international assessment may be seen positively, an assessment that is not complementary may raise questions for students about the value of their qualification in the country of study, or the reasons why the higher education institution did not seek national evaluation; and

- Language differences: as often higher education institutions' internal documents are only available in the national language, and external review would require translation, or a team that is fully competent in the national language, potentially incurring in administrative burden and financial costs.

It should be noted that there are mechanisms in place to address some of these concerns, such as EQAR complaints procedures, which allows individuals or organisations with substantiated concerns about a registered agency's alignment with the ESG to report this to EQAR. Systematisation of processes for the sharing of information on previous assessments in the home country when a foreign agency receives a request would be useful in this context too. Some relevant good practices that both agencies and institutions are recommended to observe have been summarised in a document published by the major stakeholders (E4) and EQAR in 2017 under the title Key Considerations for Cross-Border Quality Assurance¹⁶⁴.

EQAR provides data on cross-border quality assurance within the European Higher Education Area. This shows that less than 3% of quality assurance processes in this area are cross-border processes part of an obligatory quality assurance system. The 2018 progress report found that around 25% of higher education institutions (lower for technical universities) that responded to its survey had their study programmes evaluated by a foreign quality assurance agency at least once at any point in the past, while the large majority, therefore, had never done it.

Figure 12. Share of quality assurance type (domestic/ cross-border) in DEQAR by year (EHEA institutions)



Source: EQAR¹⁶⁵

The 2009 Progress Report raised concerns that quality assurance agencies in smaller national systems may face additional barriers in terms of their recognition abroad. In the context of this

¹⁶⁴ See <https://www.eqar.eu/kb/cross-border-qa/key-considerations/>

¹⁶⁵ <https://www.eqar.eu/kb/cross-border-qa/drafting-cross-border-external-qa-activities/>

study, the number of reports produced for other countries¹⁶⁶ by the EQAR registered agencies in 2021 of the four smaller higher education systems in the EU, as measured by the number of students¹⁶⁷, were reviewed. Only the quality assurance agency in Cyprus had produced a report for an institution in another EU Member State (although the Latvian quality assurance agency AIC had produced four reports for a non-EU country). While, as noted, the number of reports meeting these conditions is generally low, the German agency ASIIN had produced two reports for French institutions and a further 10 for Spanish institutions. Thus, the remit of agencies from the smallest national systems seems to be largely limited to their country. While these patterns may change year on year given specific country connections and quality assurance cycles, higher education institutions are not making extensive use of quality assurance agencies in other EU Member States, particularly those from smaller national systems.

5.6.2 Joint programmes

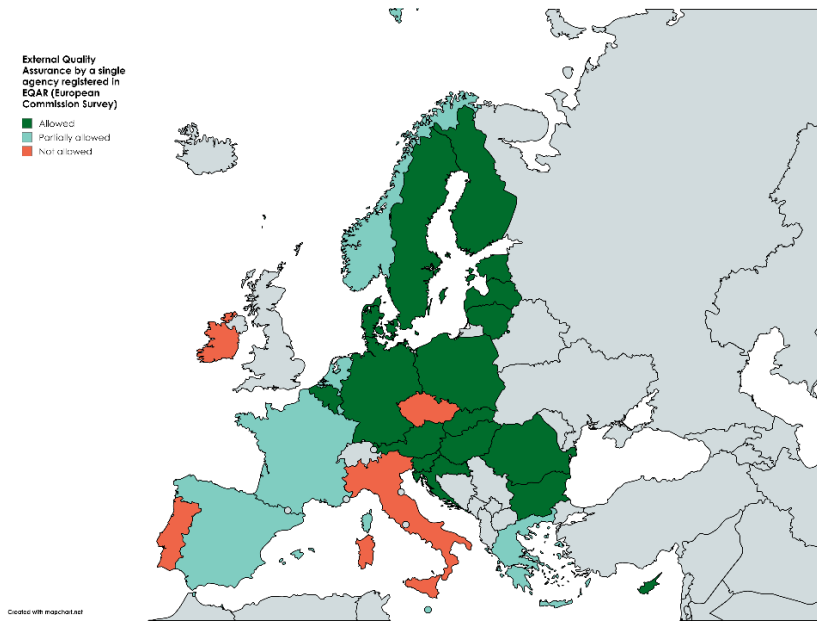
A specific case is the use of a EQAR registered agency arises in the quality assurance of joint transnational programmes. Recommendation Seven of the Council Recommendation on building bridges for Effective European higher education cooperation, in line with the European Approach, refers to allowing that the external evaluation of joint transnational programmes can be carried out by one single agency registered in EQAR and that the outcomes of this external evaluation are automatically accepted in all other higher education systems concerned, without adding further national requirements.

The 2023 European Commission survey of national authorities shows an uneven implementation of this part of Recommendation Seven, as 17 systems allow external quality assurance of these programmes to be carried out by any agency in EQAR. Five systems allow it only if additional national criteria are met. For example, Spain allows it only for programmes offered by European Universities alliances where a Spanish university is a member, and the national quality assurance agency in Greece must give an authorisation before a foreign EQAR-registered agency can carry out external quality assurance of joint study programmes which involve a Greek higher education institution. Implementation is not allowed in five systems. These data differ in some respects from the data provided by country research (see Figure 13), which suggested that the external evaluation of joint transnational programmes can be carried out by one single agency registered in EQAR and its outcomes are accepted in ten systems. Twelve systems were reported to allow it if additional criteria are met, and five not to allow it -data was not available for one system (Sweden).

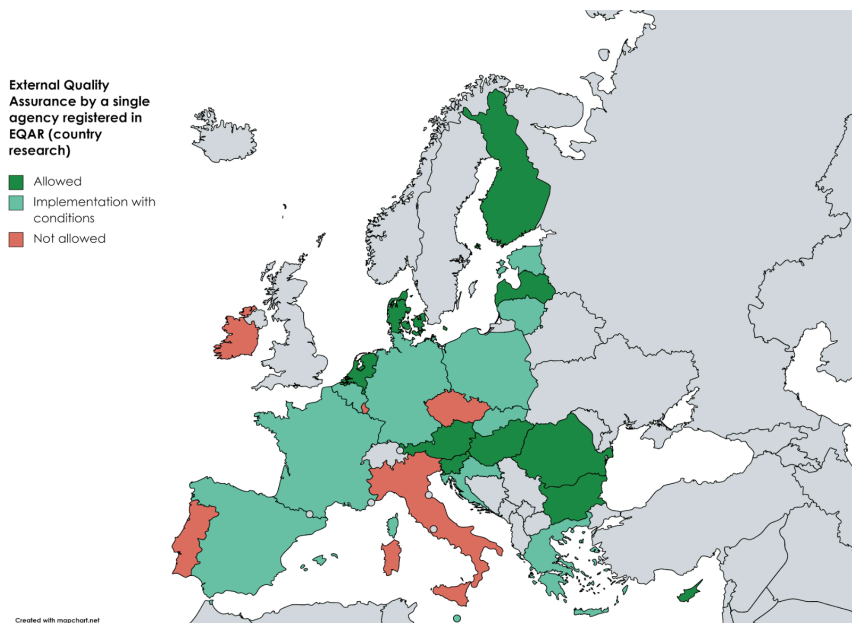
¹⁶⁶ Based on data from <https://datawrapper.dwcdn.net/eG51h/6/>

¹⁶⁷ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Tertiary_education_statistics#Participation_in_tertiary_education_by_sex Countries with under 100,000 tertiary education students were reviewed -Luxembourg was excluded as it does not have a quality assurance agency.

Figure 13. External quality assurance by a single agency registered in EQAR for joint programmes



Source: European Commission (2023)



Source: Country reports.

Additional requirements exist or restrictions may apply in Member States where partial implementation occurs. For example, this may be allowed only for new joint study programmes (e.g. Belgium (French Community) and Lithuania), if the external evaluation follows the national framework for quality assurance and has this confirmed by the national agency¹⁶⁸ (e.g. Belgium (Flemish Community), Croatia, Estonia, Slovakia) or if higher education institutions can cover the costs associated with the external evaluation (e.g. in Lithuania the costs of

¹⁶⁸ For example, in Estonia, the outcomes of external evaluation from another country's authority are not automatically accepted. Estonian higher education institutions need to request the foreign country's authorities' external evaluation to be accepted. Then the Estonian quality assurance agency HAKA evaluates if the following criteria are met: (1) the evaluation of the joint programme's evaluation has been conducted according to the European Approach; (2) the evaluation result is positive, (3) the evaluation report contains information on all the aspects listed in the Estonian Higher Education Act § 9(2); (4) the joint programme corresponds to the requirements set in the Estonian Higher Education Act § 11(1) and § 11(2).

external quality assurance if covered by the state, but if foreign quality assurance agencies are used the institution needs to pay for the associated costs). The table below summarises the additional criteria that should be fulfilled to allow one single agency registered in EQAR to carry out the external evaluation of joint transnational programmes.

Table 2. Overview of additional criteria

Additional criteria	Country examples
New joint study programmes	BE (French Community), LT
Final approval of national quality assurance agency	BE (Flemish Community), EE, EL, SK, HR
Only certain institutions	ES (only for programmes offered by European Universities alliances where a Spanish university is a member)
Additional costs must be covered by higher education institutions themselves	LT

Source: Country reports and European Commission survey (2023).

5.7 Allow higher education institutions to work towards complementary assessment by another agency in the European register

Higher education institutions may want to work towards complementary assessments by another agency registered in EQAR, for example to enhance their international reputation¹⁶⁹. DEQAR data shows that institutions in all EU Member States have made use of foreign agencies for complementary assessments although to very different extents. The research team did not come across evidence that complementary assessments are prevented in any EU system. Some reports noted, however, that even when higher education institutions are allowed to use a complementary assessment, they may decide to seldom use it, as is the case in Bulgaria.

When institutions seek complementary assessments to those required at the national level to enhance their international reputation, they sometimes also turn to discipline-based accreditations by agencies not registered in EQAR (like EQUIS/ EFMD¹⁷⁰) or based outside of the EU (such as ABET or AACSB¹⁷¹).

¹⁶⁹ As flagged by an interviewee from the Ministry of Higher Education in Slovenia interviewed on 03rd of August 2023.

¹⁷⁰ EFMD is the European Foundation for Management Development, an international not-for-profit association in the area of management development, which is a network of business schools, corporations and other institutions involved in management education. EFMD operates various services and accreditation processes for business schools and management education programmes, including the EFMD Quality Improvement System (EQUIS), which is a quality review and improvement system for business and management schools. For further information see: <https://www.efmdglobal.org/accreditations/business-schools/equis/>

¹⁷¹ ABET (Accreditation Board for Engineering and Technology) is a quality assurance organisation focused on higher education programmes in STEM disciplines. It accredits over 4,500 programmes in over 900 institutions globally. For more information see <https://www.abet.org/> AACSB (Association to Advance Collegiate Schools of Business) is an American professional organisation that aims to foster excellence in business education and provides accreditation to business schools and

5.8 Promote cooperation between agencies

Cooperation between agencies can help to increase credibility, transparency and consistency in their assessments. The 2018 progress report noted that the overwhelming majority of quality assurance agencies already cooperated between them and with agencies based in third countries. Such cooperation focused on mutual learning and exchange of good practices (44% reported a very/ rather significant cooperation), facilitating internationalisation (36%), developing common policies/ priorities/ standards / consensus (35%), increasing transparency of information on quality (35%) and mutual recognition or accreditation and quality assurance decisions (30%).

For the present study, the majority of Member States for which data is available were assessed as fully meeting this criterion, but several countries only met it partially. For example, the French quality assurance agency Hcéres and its international team are active in numerous international cooperation networks and projects, including initiatives like the Certificate for Quality in Internationalisation (Cequent), and participation in the project Developing a European Approach for Comprehensive quality assurance of (European) University Networks, EUniQ¹⁷², described in box 5.1 below.

EUniQ: Erasmus+-funded European cooperation project

As part of EUniQ, also known as Developing a European Approach for Comprehensive quality assurance of (European) University Networks, eight quality assurance agencies, six ministries and three key European stakeholder (the European Universities Association EUA, the European Students Union ESU and the European Association for Quality Assurance in Higher Education ENQA) cooperated and piloted a quality assurance approach for European Universities alliances inspired by the European Approach, between 2019 and 2021. EUniQ supported the idea that European Universities alliances should be able to request an external evaluation with one European framework and one corresponding quality assurance procedure. EUniQ resulted in the project partners drafting and adopting a quality assurance framework for European universities.

In Malta, the Malta Further and Higher Education Authority (MFHEA) has the power to cooperate with quality assurance and accreditation authorities in other countries with respect to providers and programmes operating across borders or operating jointly with local providers, and is active in these areas. Some other quality assurance agencies that were reported by stakeholders to be highly internationally collaborative include those in Estonia or Finland.

It should be noted that sectoral organisations, in particular ENQA, contribute to cooperation and trust building, promoting common standards and approaches, making specialist publications available¹⁷³ or organising seminars to examine issues of relevance for quality assurance agencies¹⁷⁴. ENQA has members or affiliates from all Member States that have own quality assurance agencies. Conferences like the European Quality Assurance Forum (EQAF) organised by the E4 (which includes ENQA) allow for exchange and mutual learning. The 2023 European Quality Assurance Forum on 'Internationalisation in a changing world. New trends and challenges for quality assurance' provides evidence of strong demand for such events, with the registration operating to full capacity¹⁷⁵. During the conference, policies and trends, research and practical case examples related to the Forum theme, and current developments in quality assurance more generally, are presented. ECA (European Consortium for

programmes around the world. It has over 1,900 members in over 100 countries. For more information see <https://www.aacsb.edu/>

¹⁷² <https://www.nvao.net/en/euniqu>

¹⁷³ See for example <https://www.enqa.eu/publications/>

¹⁷⁴ See for example <https://www.enqa.eu/events/enqa-agency-reviews-seminar-for-agencies-planning-to-undergo-a-review-in-2022-2023/#:~:text=ENQA's%20seminar%20for%20agencies%20planning,1%20June%20at%2012%3A45.>

¹⁷⁵ <https://eua.eu/events/124-2023-european-quality-assurance-forum.html>

Accreditation) has 17 members from 12 EU Member States and has the objective to promote the mutual recognition of qualifications and quality assurance decisions and provides a platform for mutual learning and cooperation. The European University Association continues to contribute to capacity-building through its numerous activities for higher education institutions as well as the Institutional Evaluation Programme (IEP¹⁷⁶).

There are also regional clusters stimulating collaboration in quality assurance, for example, the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA)¹⁷⁷, which includes full members from several EU Member States (Austria, Bulgaria, Croatia, Czech Republic, Estonia, Germany, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia), or the Nordic Quality Assurance Network in Higher Education (NOQA), which includes three EU Member States (Denmark, Finland and Sweden) amongst its five members.

According to an Estonian stakeholder interviewed for this study, further cooperation and pooling resources would reduce costs and create added value. For example, it could be more cost efficient for smaller national systems to work with a single EQAR-registered quality assurance agency covering small neighbouring countries than to fund their own quality assurance agency -e.g. Estonian higher education institutions could work with one agency covering the Baltic countries. An evaluation by a single agency from EQAR for all partner institutions in joint programmes could also enhance the perceived independence of the evaluation (especially for partner universities in smaller systems, which may be seen to have close ties between quality assurance evaluators and higher education institutions¹⁷⁸).

Erasmus+ can be used to promote cooperation. The programme has been used to foster networking and build capacity amongst higher education institutions and quality assurance agencies, improve the implementation of Bologna process tools, foster dialogue between sectors (e.g. vocational education and training) and facilitate the development of international joint programmes. Yet, an analysis of the Erasmus+ projects database¹⁷⁹ shows that only 3% of projects on quality assurance covered higher education, compared to 48% (1044 projects) covering vocational education and training (VET) and 33% (725 projects) covering school education. This contrasts with the overall spread of projects (on any topic), as this is much more evenly spread across higher education, vocational education and training and school education: around 50,000 projects in the case of each of the first two and 60,000 for school education. Of the 62 Erasmus+ projects included in the database that covered quality assurance in higher education, eight were active at the time of the search. Of these eight projects, only a minority included quality assurance agencies or accreditation institutions in their partnerships.

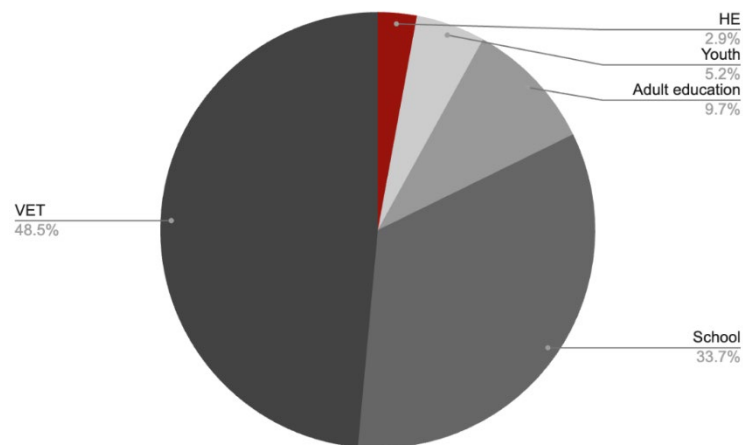
¹⁷⁶ See <https://www.iep-qa.org/>

¹⁷⁷ <https://www.ceenqa.org/>

¹⁷⁸ Interview Ministry of Higher Education Slovenia, 03 August 2023.

¹⁷⁹ <https://erasmus-plus.ec.europa.eu/projects/search>

Figure 14. Erasmus+ projects on quality assurance, by sector



Source: Erasmus+ project database (accessed on 03/11/2023).

Some country researchers pointed out that further progress is still required to implement effective cooperation, as quality assurance agencies face barriers to cooperation, often related to financial and human resources, as well as too much diversity in quality assurance systems and practices.

5.9 Ensure public access to assessments made by the agencies listed in the EQAR register

The 2006 Recommendation recommends that Member States ensure public access to the assessments made by the quality assurance or accreditation agencies listed in the European Register, to improve transparency and trust. While publication can also occur at the national level, a Database of External Quality Assurance Results (DEQAR) was created to make assessments available in a single European one-stop shop to facilitate transparency, mutual trust and cooperation. Quality assurance assessments are publicly available in a majority of Member States through quality assurance agencies' own websites and DEQAR, but in three countries publication in DEQAR needs to be improved, and four countries do not publish their reports in DEQAR. As DEQAR is increasingly connected with other databases and initiatives, for example to demonstrate quality assurance in the context of European Digital Credentials for Learning (EDC¹⁸⁰) or to integrate information in recognition workflows¹⁸¹, the absence of reports from DEQAR could become more problematic in the future.

Publications may include:

- the self-assessment reports of higher education institutions (e.g., Estonia)
- the external institutional-based audit reports of higher education institutions (e.g., Finland, France)
- opinions and decisions regarding programmes (e.g., Poland)
- the agency's review (e.g., Cyprus)

Publications should be easily accessible and clear, as required by ESG standard 2.6. Country researchers reported several difficulties in this regard. Public access was partial due to technical difficulties which were being resolved (Netherlands), to variable quality practices across regions (Spain), to the lack of reader-friendly publications (i.e. long and very technical, Estonia) or because only some types of reports are available (Cyprus, where guidelines for

¹⁸⁰ See <https://www.eqar.eu/qa-results/synergies/european-digital-credentials-for-learning/>

¹⁸¹ See <https://www.eqar.eu/qa-results/synergies/enic-naric-integration/>

quality improvement in higher education are available online but higher education institutions evaluations are not published, according to the country researcher).

The 2020 Bologna process implementation report¹⁸² notes that the legal framework in some higher education systems makes the publication of reports dependent on the explicit permission of the higher education institution, which may restrict quality assurance agencies' ability to publish all reports, especially those with a negative outcome. As of November 2023, negative reports published in DEQAR represented less than 2% of all reports included in the database¹⁸³. However, in the absence of data on the population of negative reports it is not possible to establish whether this is a fair representation of the reports issued with a negative decision by EQAR registered agencies, or if a significant share of negative reports is not being published. The Bologna process implementation report notes that governments should ensure that legislation is not a barrier to implement the ESG so that quality assurance agencies can meet expectations for EQAR registration.

5.10 Conclusions

Progress has been partial and unevenly distributed between recommendations and European countries

This chapter provided a review and evaluation of the situation regarding the recommendations outlined in the 2006 Recommendation on further cooperation in quality assurance in higher education. This review has shown that progress towards the implementation has been partial. While very good progress has been achieved in relation to a range of the elements of 2006 Recommendation, the rate of progress has differed between topics, and seventeen years after its adoption of only one of its recommendations has been fully implemented in all EU Member States. There are some shortcomings in the implementation of all other recommendations, although to varying degrees.

An overall good level of implementation, although with significant exceptions, has been achieved in relation to the introduction of rigorous internal quality assurance systems in accordance with the ESG and membership/ registration in the European register. Lower degrees of implementation were reported in relation to other recommendations: independence of assessments; higher education institutions being able to choose quality assurance agencies from other Member States even if they are included in the European register; the promotion of cooperation between agencies; and in ensuring public access to the assessments performed by quality assurance agencies listed in the register. Moreover, the promotion of cooperation between agencies had the objective of promoting automatic recognition of qualifications, an area where problems persist, as discussed in Chapter 6.

The extent of implementation is also uneven across parts of the EU, with Southern and Eastern European countries showing lower levels of implementation, whereas a small set of countries has achieved full implementation of all the recommendations – including some countries in Eastern Europe. This suggests that some countries would benefit from additional support measures for implementation, including through mutual learning processes.

There is a need to further clarify the benefits derived from the recommendations, and to redesign the system of incentives to implement them.

Partial implementation can be related to a low level of political will or priority at the national level regarding the recommendations. The incentives and benefits of following the recommendations thus need to be made clearer to Member States. But there is also a case for changing the system of incentives currently in place, so that Member States and institutions bring about the required changes, for example by using selection criteria for relevant EU

¹⁸² <https://op.europa.eu/en/publication-detail/-/publication/c90aaf32-4fce-11eb-b59f-01aa75ed71a1/language-en/format-PDF/source-183354043>

¹⁸³ The decision can be "negative", "positive with conditions" or "positive".

funding calls by DG EAC or DG REFORM, the latter through the Technical Support Instrument, related to higher education.

The 2006 Recommendation, in its current form, does not provide sufficient political direction for the future

The analysis shows that some recommendations in the 2006 Council Recommendation are no longer relevant, because they have been completely achieved, or only a small set of countries remains to achieve them. When these countries require support to achieve a recommendation, this should be provided, but the recommendation becomes less relevant for the whole set of Member States and does not provide the political direction for future progress.

Moreover, other recommendations remain at a purely formal level without referring to practical implementation, and are thus insufficiently ambitious in relation to the area that they cover. For instance, this is the case with the specific recommendation of 'enabling higher education institutions active within a country's territory to choose among quality assurance or accreditation agencies in the European Register an agency which meets their needs and profile, provided that this is compatible with their national legislation or permitted by their national authorities', which only formulates a formal requirement, but does not refer to the conditions that would facilitate institutions making use of agencies in other countries by, for example, ensuring that those institutions are not penalised through the reception of lower subsidies than if they undertook the assessment at the national level.

A summary assessment of the current recommendations in the 2006 Recommendation is provided in the following table:

Table 3. Assessment of the relevance of current elements in the 2006 Council Recommendation

Recommendation elements	Assessment
Encourage all higher education institutions active within their territory to introduce or develop rigorous internal quality assurance systems, in accordance with the ESG	Requires reformulation as it is relevant but has been achieved by most countries at the level presented in the Council Recommendation and is no longer politically relevant to guide future actions in its current form
Encourage all quality assurance or accreditation agencies active within their territory to be independent in their assessments	Focuses on assessment and not on a broader set of conditions for independence, such as membership or funding
Encourage the set up a 'European Register of Quality Assurance Agencies' (European Register) based on national review	No longer politically relevant to guide future actions as it has been implemented. If agency registration is considered alongside the creation of the Register, most EU countries have quality assurance agencies registered in EQAR
Enable higher education institutions active within their territory to choose among quality assurance or accreditation agencies in the European Register an agency which meets their needs and profile, provided that this is compatible with their national legislation or permitted by their national authorities	Remains at formal level and is not sufficiently concrete regarding the incentives for institutions to undergo such assessments, or the barriers that should be removed (such as excessive diversity in regulations)
Allow higher education institutions to work towards a complementary assessment by another agency in the European Register, for example to enhance their international reputation	Achieved in all countries and no longer politically relevant to guide future actions
Promote cooperation between agencies in order to build up mutual trust and the recognition of quality assurance and accreditation assessments, thus contributing to the recognition of qualifications for the purpose of study or work in another country	Continues to be relevant and requires further impetus, especially as automatic recognition of qualifications has not yet been achieved
Ensure public access to the assessments made by the quality assurance or accreditation agencies listed in the European Register	Continued relevance, but clearer focus on further ambitions is needed, e.g. work towards enhanced consistency in the information provided to enable comparability across countries, ensure central access through DEQAR and link it up with other initiatives.

Increasingly important areas for the future of quality assurance are not covered appropriately in the 2006 Council Recommendation

In addition, a number of pressing areas for the future of quality assurance cooperation are not appropriately covered in the 2006 Council Recommendation. These include:

- the need for efficiency in quality assurance processes: avoiding duplication, digitalising processes and making the best use of available data;
- incorporating more thematic topics, such as the link to recognition, authenticity and academic integrity, inclusion, green and digital transition and outcomes (achievement and employability)
- the need for greater cost-benefit analysis of recommendations: as higher education institutions often perceive that external quality assurance processes do not sufficiently consider workload and cost implications of the recommendations to higher education institutions.

There is a need to further clarify how to monitor progress at the country and institutional levels

There is no clear agreement on the set of fine-grained indicators and benchmarks for success that should be used to measure progress at the country level against the recommendation. Increasing attention to quantitative data-driven approaches to quality assurance (including through the use of digital tools) is considered an important development in the implementation of rigorous internal quality assurance by most countries, and higher education institutions in the EU. Quantitative approaches require agreement on the right range of indicators to be used, which is currently lacking. Efforts on bringing greater coherence to graduate tracking efforts across Europe provide an example of how it is possible to reach agreements on indicators that are of central importance to the measurement of quality in higher education. This example could be expanded to other key areas.

6 The relation between Quality Assurance and Recognition

6.1 Introduction

This chapter explores the links between recognition processes and quality assurance. The 2006 Council Recommendation on further European cooperation in quality assurance in higher education covered the mutual recognition of quality assurance agency assessments to build and facilitate the recognition of qualifications. The ESG additionally note that “engagement with quality assurance processes, particularly the external ones, allows European higher education systems to demonstrate quality and increase transparency, thus helping to build mutual trust and better recognition of their qualifications, programmes and other provision” (p.6¹⁸⁴). According to the European Approach, the recognition of qualifications and of periods of studies (including recognition of prior learning) should be applied in line with the Lisbon Recognition Convention and subsidiary documents.

The 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad¹⁸⁵ defines automatic mutual recognition as the right for holders of a qualification of a certain level issued by a Member State and giving access to higher education in the home country, to be considered for access to a higher education programme or entry to the next level in any other Member State without having to go through any separate recognition procedure (e.g. general access to higher education = general access to higher education; Bachelor = Bachelor; Master = Master), and without the intervention of a credential evaluator because the level, quality and workload of a qualification are automatically accepted.

The Recommendation reiterates the importance of building on the work already accomplished in the context of the ESG and the European Approach and cites external quality assurance carried out by independent quality assurance agencies registered, or moving towards being registered, with EQAR as the foundation for automatic recognition. In the Recommendation, Member States are asked to develop national guidance to support higher education institutions in producing and effectively implementing transparent criteria for recognition that are applied throughout each higher education institution¹⁸⁶.

The remainder of this chapter discusses the link between quality assurance and recognition of qualifications obtained in other EU Member States (section 6.2), before giving an overview of the EU higher education systems where recognition processes are included in external quality assurance (section 6.3) and the use of transparency tools of relevance for quality assurance (section 6.4), before presenting the chapter conclusions (section 6.5).

6.2 The link between quality assurance and recognition

The link between recognition and quality assurance is complex and multifaceted. Recognition procedures can be different across Member States, types of higher education institutions in differentiated systems or education levels (with differences between bachelor and masters/doctoral levels). The 2018 Council Recommendation is closely related to quality assurance, as this should ensure that educational institutions follow certain standards in the recognition of qualifications, certifications, learning outcomes and credits. Thus, recognition processes can be quality assured. A recent evaluation of the implementation of the 2018 Council recommendation on promoting automatic mutual recognition of higher education¹⁸⁷

¹⁸⁴ https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

¹⁸⁵ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018H1210\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018H1210(01))

¹⁸⁶ See p. C444/3 in the Council Recommendation.

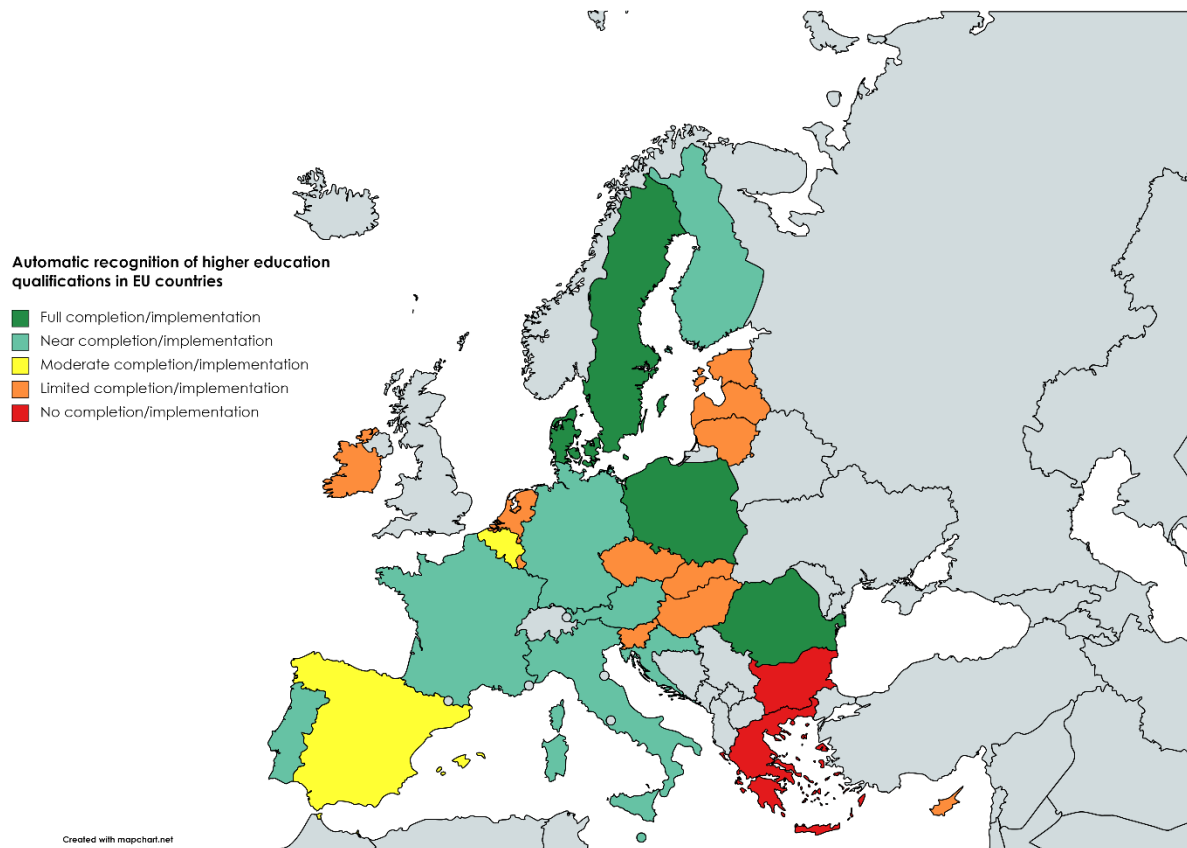
¹⁸⁷ ICF (2023) Implementation of the 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad. Luxembourg, Publications Office of the European Union.

concluded that, in practice, systematic and strong links between recognition and internal and external quality assurance are lacking and that broader and enhanced links should be in place: recognition procedures should become a more important and visible part in quality assurance processes -see section 6.3 for a fuller discussion.

Quality assurance can also be linked to recognition when it becomes a criterion that is considered for recognition. In France for example, one of the criteria considered for automatic recognition by European Network of Information Centres and national academic recognition centres (ENIC-NARIC) is the existence of a quality assurance system based on the ESG in the country of origin of the qualification and on degrees being accredited by an agency registered with EQAR.

There are still substantial barriers to automatic recognition. The 2023 study on the implementation on the Council Recommendation on Automatic Mutual Recognition found that few systems that had implemented automatic mutual recognition in full, while in many countries was limited or non-existent, as detailed in Figure 15.

Figure 15. Automatic recognition of higher education qualifications in EU Member States



Source: 2023 Evaluation on the implementation of the Council Recommendation on Automatic Mutual Recognition. Colour code: green = full completion/implementation, light green = near completion/implementation, yellow = moderate completion/implementation, orange = limited completion/implementation, red = no completion/implementation. *Belgium (FR/NL): FR refers to Wallonia and the French community, while NL refers to Flanders and the Flemish community.

Another way to explore the connection between quality assurance and recognition is from an organisational perspective. In some countries, external quality assurance and recognition are organisationally linked as the quality assurance agency and national academic recognition centres (NARIC) are the same organisation. However, this is the case in a minority of countries. These are noted in the table below.

Table 4. Countries where the NARIC and Quality Assurance Agency reside in the same institution

Country	Institution
Croatia	Agency for Science and Higher Education
Latvia	Quality Agency for Higher Education, part of the Academic Information Centre
Finland	FINEEC, part of EDUFI ¹⁸⁸
Lithuania	Centre for Quality Assessment in Higher Education
Luxembourg	Ministry of Education and Research
Malta	National Commission for Further and Higher Education
Ireland	Quality and Qualifications Ireland

Source: Eurydice¹⁸⁹ and ENIC_NARIC¹⁹⁰

In Latvia, for example, the National Quality Assurance Agency (AIKA) operates since 2015 as a structural unit of the Academic Information Centre (AIC). The examination of educational documents issued abroad, as well as documents certifying academic degrees obtained abroad, is carried out by the AIC (stipulated by Part 1 of Article 11.1 of the Education Law). Luxembourg is a special case, as it does not have a national quality assurance agency for higher education. However, the Ministry of Education and Research oversees both quality assurance and recognition.

In other countries the two organisations are separate, even if both may be linked to the same policymaking body. For example, in Czechia, the Ministry of Education, Youth and Sports is responsible for the NARIC, and the National Accreditation Bureau for Higher Education (NAB) for quality assurance, but the Ministry has some control over the operations of the NAB.

There may be cooperation between the organisations responsible for quality assurance and recognition, even if they are in different bodies. For example, in Spain, there is participation of the national quality assurance agency (ANECA) in the Commission for Technical Analysis of Standardisation and Declaration of Equivalence, to provide reports on the knowledge and competences acquired in different higher education degrees. In the Netherlands, the responsible body for the recognition of foreign qualifications/ diplomas, is the Dutch ENIC/NARIC, which is part of The Dutch Organization for Internationalisation in Education (Nuffic), and this collaborates with NVAO on actions such as receiving international delegations and referring delegations to each other's organisations.

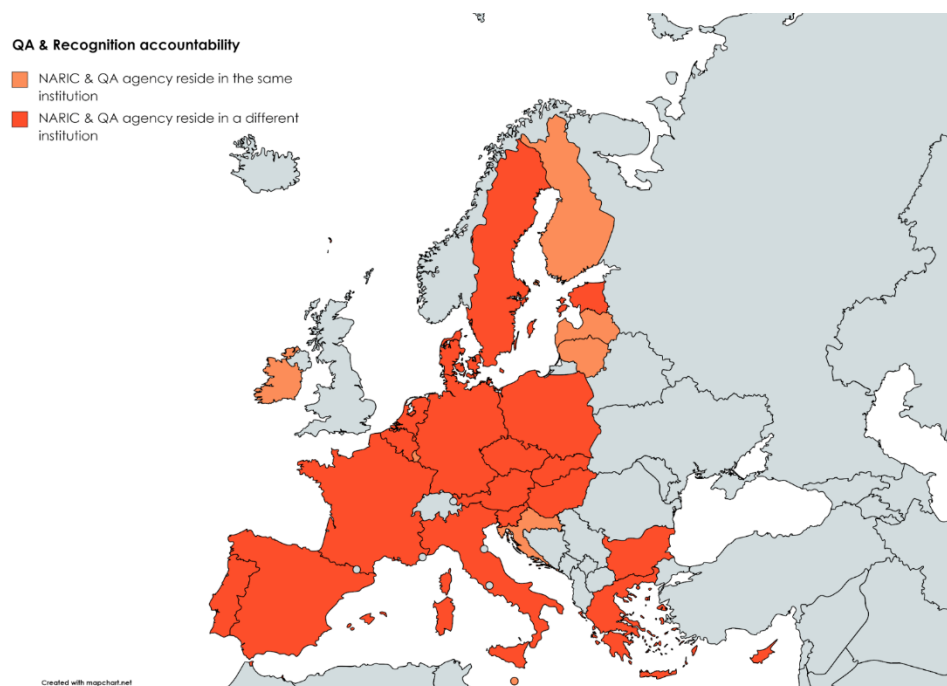
Figure 16 below provides an overview of the connection between quality assurance and recognition, based on the respective overseeing agencies.

¹⁸⁸ The Finnish Education Evaluation (FINEEC) is the Finnish quality assurance agency, whereas the Finnish National Agency for Education (EDUFI) is the country's ERIC-NARIC. FINEEC "operates within the branch of government of the Ministry of Education and Culture, as a separate unit within the Finnish National Agency for Education (EDUFI)"¹⁸⁸.

¹⁸⁹ <https://eurydice.eacea.ec.europa.eu/national-education-systems>

¹⁹⁰ <https://www.enic-naric.net/>

Figure 16. Quality Assurance and Recognition accountability map



Source: Eurydice¹⁹¹ and ENIC_NARIC¹⁹²

6.3 Inclusion of recognition processes in external quality assurance guidelines and procedures

This section reviews the inclusion of recognition processes in external quality assurance guidelines and procedures, and includes examples illustrating this. Previous research already noted that a significant proportion of higher education institutions do not have internal quality assurance procedures in place for recognition¹⁹³. This is in line with more recent evidence from the QA-FIT project, where most of the student unions surveyed reported that mobility and structures to support internationalisation are amongst the internal quality assurance areas that are least frequently evaluated through external quality assurance¹⁹⁴. The 'Integrating Academic recognition and quality assurance: practical recommendations' (LIREQA) project, found that only 58% of higher education institutions¹⁹⁵ had incorporated recognition in their internal quality assurance processes, and further recommended to systematically include recognition in external quality assurance procedures.

Country researchers for the present study reported references to recognition in external quality assurance guidelines and procedures from quality assurance agencies and/or national regulations/legislations in eight national systems, which is a very low number.

¹⁹¹ <https://eurydice.eacea.ec.europa.eu/national-education-systems>

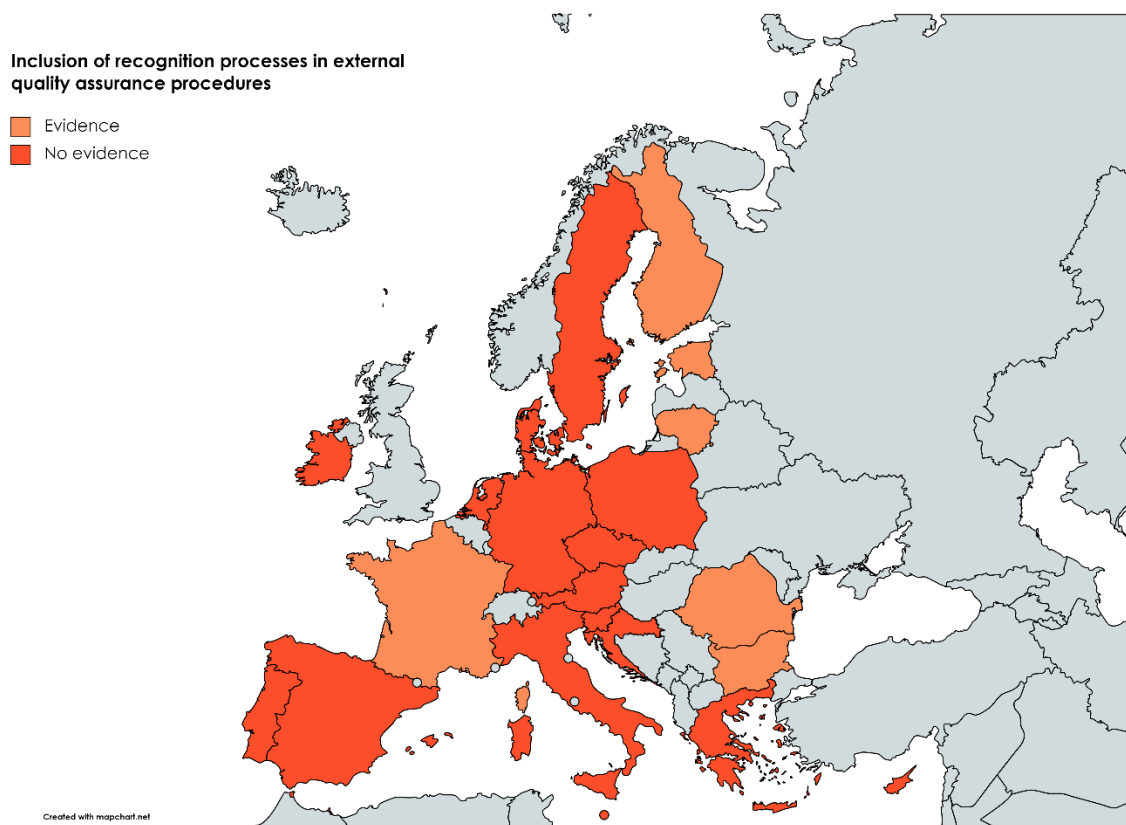
¹⁹² <https://www.enic-naric.net/>

¹⁹³ Sutkute, S. (2018) Linking Academic Recognition and Quality assurance, survey of higher education institutions, 13 Feb., [HEI_survey_results \(skvc.lt\)](https://www.skvc.lt/). The survey of HEIs conducted by LIREQA found that 58% of higher education institutions surveyed across eight systems (including Norway) had incorporated recognition in internal quality assurance; which implies that a significant proportion of higher education institutions had not incorporated recognition in internal quality assurance yet.

¹⁹⁴ See Pavletić, P., Gvritshvili, A., Drobnič M. and Korzeniowski, A. (2023) Europe united for the future of the quality of education: innovation, digitalization, sharing knowledge and practices. European Quality Assurance Forum. University of Aveiro, 22-25 Nov. 2023.

¹⁹⁵ 123 higher education institutions were surveyed across eight countries: Belgium, Estonia, France, Ireland, Latvia, Lithuania, the Netherlands and Norway as part of the LIREQA project. For more information, see: [HEI_survey_results \(skvc.lt\)](https://www.skvc.lt/)

Figure 17. Inclusion of recognition processes in external quality assurance procedures



Source: Country reports¹⁹⁶

Links were reported in several countries:

- In Bulgaria, the National Evaluation and Accreditation Agency (NEAA) issues guidelines on recognition which follow a governmental ordinance. The guidelines specify that recognition process should include a) the verification of the status of the higher education institution awarding the degree; b) authenticity check of the documents and c) evaluation of the qualification acquired abroad against the respective Bulgarian state requirements for the acquisition of an equivalent higher education degree. The HEI Ordinance (Art. 11) also specifies common indicators for recognition that have to be considered by each higher education institution, for example: admission procedures at the foreign higher education institution; study duration, total number of study hours or credits acquired, ratio of academic disciplines and their hours, which provide fundamental, special, specialised and practical training; set of learning outcomes acquired; graduation procedure. Higher education institutions then develop their internal recognition procedures and, subject to these procedures being externally quality assessed, make recognition decisions.
- In Estonia, the institutional accreditation guidelines issued by the national quality assurance agency (HAKA) explain that recognition should support international student mobility and specify that the academic recognition of qualifications should be based on

¹⁹⁶ The country researcher for Malta noted that the regulation is not explicit regarding mobility periods in the country. The fifth standard of the 11 standards by which providers' quality assurance processes are audited addresses, according to the MFHEA's External Quality Assurance Provider Audit Manual of Procedures states: "Student admission, progression, recognition and certification: entities shall consistently apply pre-defined and published regulations covering all phases of the student 'life-cycle'... In particular...they have mechanisms in place to take into consideration relevant qualifications that are accredited or recognised by the NCFHE, and relevant periods of study and prior learning, including the recognition of non-formal and informal learning". The regulation does not clarify explicitly whether the recognition of previous studies abroad is covered by this standard.

international conventions, agreements between countries and the Estonian legislation. The outcomes of a quality assurance evaluation by another country's agency are not automatically accepted. The Estonian quality assurance agency HAKA checks if the evaluations meet the requirements set in Estonian national legislation for example.

- In Finland there is evidence of the inclusion of recognition processes covering qualifications, certificates, prior learning, partial studies, learning periods abroad in external quality assurance processes. Recognition decisions are decentralised to higher education institutions. The quality assurance agency FINEEC acknowledges in its audit manual that external quality assurance based on institutional audits covers the institutional recognition processes for learning outcomes irrespective of where and how they are completed. In addition, representatives of university organisations have developed guidelines focusing on the recognition of prior learning, which also includes the recognition of learning outcomes acquired abroad.
- In Lithuania, the procedure for the external evaluation and accreditation of studies approved by the Ministry of Education includes criteria related to recognition of qualifications obtained abroad. Higher education institutions decide on the recognition of qualifications acquired abroad. Quality assurance experts evaluate whether the higher education institution has robust internal procedures for recognition during external quality assurance.
- In Romania, during the external quality assurance process, higher education institutions must demonstrate that they have: a) a regulation regarding the recognition of higher education qualifications, study periods and previous learning, with recognition procedures in alignment with good practices and/or international regulations to which Romania is a party; b) clear procedures regarding the recognition and validation of transferable credits obtained within other programmes at the same institution or at other institutions and specifying the maximum number of transferable credits that can be recognised in an academic year, not to exceed 60 ECTS; c) structures and procedures to facilitate student mobility in the same system or between different higher education systems.

In other countries, like Slovenia, quality assurance agencies may make references to recognition but there is no detailed reference to it in quality assurance guidelines and external quality assurance. The Slovenian Quality Assurance Agency (SQAA) only notes in general terms that the criteria for the recognition of skills and knowledge acquired before entering the study programme (including those acquired abroad) should be clear and understandable, but the external quality assurance process does not explicitly cover the internal recognition procedures of higher education institutions.

The 2023 Mobility Scoreboard Report¹⁹⁷ covers a wide set of European systems (39 systems), some of which are outside of the EU and monitors recognition as required by the Lisbon Recognition Convention. According to the reports' analysis, 13 out of the 39 European systems analysed have system-level automatic recognition for higher education qualifications issued in the European Higher Education Area in place. Out of those 26 systems that do not, only in nine the recognition practices in higher education institutions were reported to be monitored by external quality assurance in line with the ESG¹⁹⁸. This provides further indication of the lack of integration of recognition in external quality assurance processes.

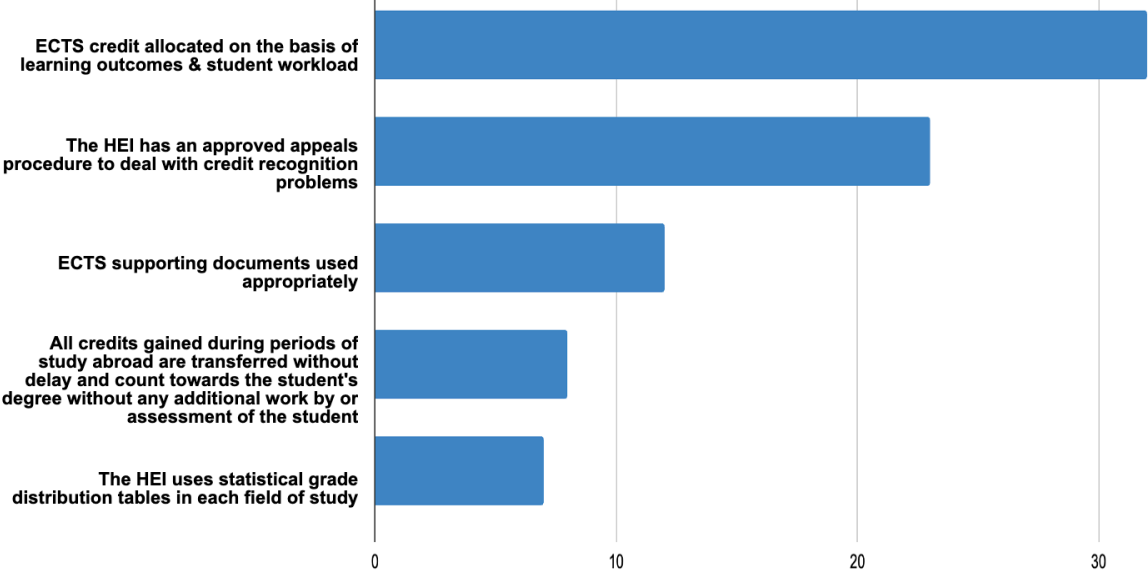
The Mobility Scoreboard report also shows that the inclusion of a key transparency tool to facilitate recognition (ECTS) in external quality assurance is far from comprehensive. Only one element analysed in the report (ECTS credits awarded on the basis of learning outcomes and

¹⁹⁷ European Commission (EACEA), *Mobility Scoreboard Higher education background report 2022/2023*, Eurydice Report. Available at <https://eurydice.eacea.ec.europa.eu/publications/mobility-scoreboard-higher-education-background-report-20222023>.

¹⁹⁸ The report does not specify which countries.

student workload) is monitored by external quality assurance in the large majority of higher education systems, as shown in the figure below. Most elements are, in fact, only monitored by external quality assurance agencies in a minority of cases.

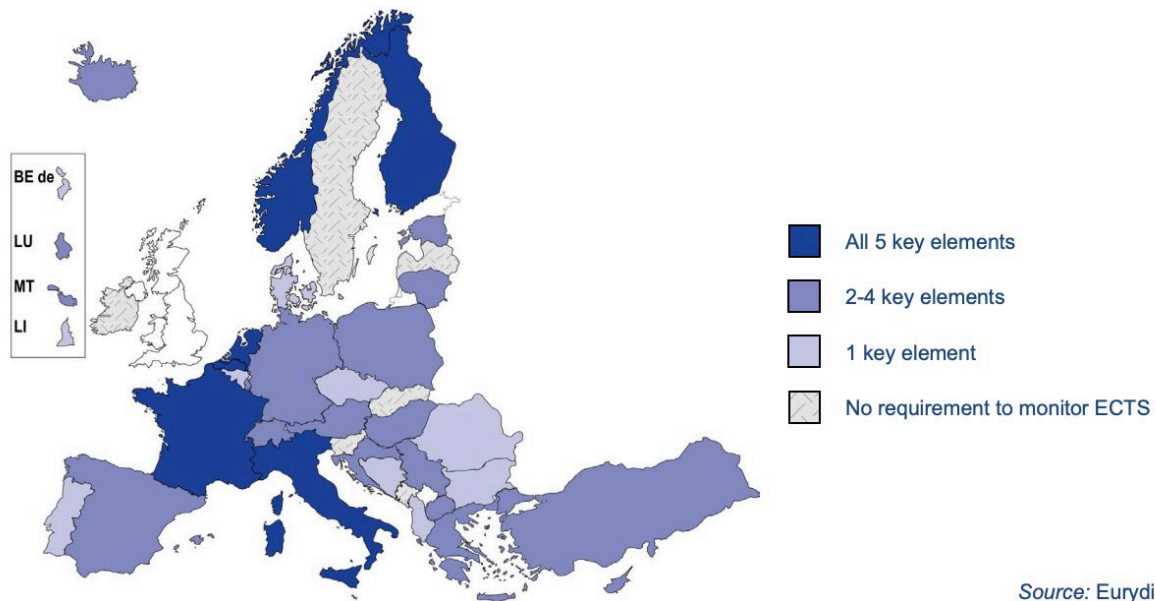
Figure 18. Requirement to monitor the key elements of ECTS related to international learning mobility by external quality assurance agencies, by number of education systems, 2022/2023



Source: Eurydice (2023)

Within the EU only Belgium (Flanders), France, Italy, the Netherlands, Finland monitor all five elements during external quality assurance procedures.

Figure 19. Requirement to monitor the key elements of ECTS related to international learning mobility by external quality assurance agencies, by number of principles, 2022/23



Examples of national regulations governing quality assurance processes in various countries that mention ECTS are provided below:

- In Lithuania, external evaluations take into account data for the last 3 years on credits awarded under mobility agreements and the percentage of the total number of credits brought back from mobility programmes;
- The Maltese quality assurance Manual ‘External Quality Assurance Provider Audit Manual of Procedures’ specifies that quality assurance covers the design and approval of programmes and ensures that self-accrediting providers have appropriate processes in place to define the expected student workload in terms of ECTS credits;
- In Romania, the quality assurance procedure described in decision 1418/2006 expects higher education institutions to have clear procedures regarding the recognition of credits obtained within other programmes at the same institution or at other institutions and specifying the maximum number of ECTS credits that can be recognised in an academic year (60 ECTS).

6.4 Transparency tools

Transparency tools have an important role in facilitating mutual trust and cooperation between higher education institutions and have heavily influenced the work of quality assurance agencies¹⁹⁹. The use of European transparency tools has gradually expanded²⁰⁰. This section summarises findings regarding the use of Bologna transparency tools relevant to quality assurance and recognition in national higher education systems, and the relationship between these tools and quality assurance processes. The tools include the European Credit Transfer System (ECTS) the European Qualification Framework (EQF), the Qualifications Framework for the European Higher Education Area (QF-EHEA), Diploma Supplement (DS), European Standards and Guidelines for quality assurance in the European higher education area (ESG), the European Approach, and the European Quality Assurance Register for Higher Education

¹⁹⁹ European Commission Progress Report 2018.

²⁰⁰ See <https://education.ec.europa.eu/sites/default/files/2023-03/Evaluation%20Report%20-%20Implementation%20of%20the%202018%20CR%20on%20promoting%20automatic%20mutual%20recognition.pdf>

(EQAR). The last three of these tools (ESG, European Approach and EQAR) are covered in detail elsewhere in this report and therefore are only briefly mentioned here.

ECTS plays a key role in contributing to transparent recognition processes and supports the recognition of learning outcomes or qualifications acquired abroad. According to the ESG 2015 [1.2], higher education institutions should have processes for the design and approval of their programmes, which define the expected student workload for example through the use of ECTS. The European Approach section 3.2 recommends that ECTS should be applied properly with the distribution of credits being clear²⁰¹.

Significant progress has been achieved in the use of ECTS. The Mobility Scoreboard report²⁰² shows that except for Ireland and Cyprus, in the countries that use ECTS, all higher education institutions report to use it in relation to first- and second-cycle programmes. However, in Latvia and Sweden ECTS is used in conjunction with a national credit system and although these may be sufficiently similar to ECTS for credits to be converted easily, 'there may be aspects of the use of national credits which differ from the agreements on how ECTS should operate'.

The monitoring of the use of ECTS in external quality assurance is covered in section 6.3.

There has also been significant progress with regards to the use Qualifications Frameworks (EQF and QF-HEA)²⁰³. The 2023 Evaluation report on the implementation of the 2018 Council Recommendation on Promoting Automatic Mutual Recognition, noted that the alignment of National Qualification Frameworks (NQFs) with the EQF and the QF-EHEA has improved over time in the EU, with referencing to both the EQF and the QF-EHEA completed in the large majority of Member States. The evaluation's fieldwork also showed the practical value of these tools for the recognition of qualifications from other Member States, as the EQF, together with ECTS, were reported amongst the tools that institutions apply more often when making decisions on the recognition of qualifications obtained abroad. In addition, Bologna implementation reports and the 2023 Evaluation report on the implementation of the 2018 Council Recommendation show that the Diploma Supplement has been widely adopted in EU Member States, although its adoption is not yet universal. A positive development has been the digitalisation of the Diploma Supplement (which is to be issued to every graduate, automatically, in a widely spoken language and for free) as part of the European Digital Credentials for Learning (EDC) infrastructure. Some of the interviewed stakeholders supported the relevance of the Diploma Supplement to increase transparency and therefore recognition²⁰⁴.

The ESG were adopted in 2005 and revamped in 2015 to correct for their initially generic nature and the lack of sufficient distinction between standards and guidelines, which led to uneven application, and to adapt them to a changed higher education landscape (e.g. greater emphasis on student-centred approaches and learning outcomes, enhancing student involvement in external quality assurance, etc.)²⁰⁵. In 2011, ENQA reported that the ESG were useful for quality assurance management, but only for a minority of academics, students or employers²⁰⁶. In 2015 the ESG were revamped to provide standards and guidelines for internal and external quality assurance as well as quality assurance agencies, and expanded its remit, to better cover topics that had increased in importance over the previous decade, such as the

²⁰¹ The European Approach suggests that a joint bachelor programme should typically amount to a total student workload of 180-240 ECTS-credits; a joint master programme should typically amount to 90-120 ECTS-credits and should not be less than 60 ECTS-credits at second cycle level (credit ranges according to the FQ-EHEA); for joint doctorates there is no credit range specified.

²⁰² European Commission (EACEA) (2023) *Mobility Scoreboard Higher education background report 2022/2023*, Eurydice Report. Available at <https://eurydice.eacea.ec.europa.eu/publications/mobility-scoreboard-higher-education-background-report-20222023>. pp. 52-53

²⁰³ See UNESCO, ETF and CEDEFOP (2023) *Global Inventory of National and Regional Qualifications Frameworks*. UNESCO, Paris. https://www.cedefop.europa.eu/files/2236_en.pdf

²⁰⁴ For example, interview, German Academic Exchange Service DAAD, 07 August 2023.

²⁰⁵ European Commission Progress Report 2014.

²⁰⁶ https://www.enqa.eu/wp-content/uploads/op_17_web1.pdf

shift to student-centred learning. Alignment with the ESG is examined for the registration of agencies in EQAR and covered elsewhere in this report.

Some countries, like Austria, have restructured their quality assurance system seeking alignment with the ESG – for example, in terms of the use of data on the student experience or graduate tracking. More generally, the general validity and usefulness of the ESG was not questioned by the stakeholders interviewed for this study. However, it should be noted that in some countries they are seen as a minimum standard and not sufficiently developed to guide further progress, whereas in quality assurance systems with a shorter history alignment with them can be seen as challenging. There are thus differences in the level of usefulness of the ESG as generators of change and improvement between quality assurance systems based on their maturity.

Three ESG have been found to be particularly challenging across systems, however. These are:

- wider participation of stakeholders (covered in various Standards and Guidelines e.g. 1.1, 1.7, 1.9, 2.2);
- creating a quality assurance culture (e.g. Guideline 1.1); and
- fostering student-centred learning (Standard and Guideline 1.3)²⁰⁷.

Moreover, some ESG are not sufficiently ambitious. Notably, the focus of the Standards and Guidelines in relation to student satisfaction data is on its collection (1.7) and use periodically in the review of programmes (1.9), but not on the use of that data in between periodic programme reviews, or the need to communicate to the student body how these data are used and what changes it has led to, or explain why no action has been taken. Furthermore, new topics of importance to the quality of higher education are not strongly incorporated -as digitalisation or the worsening of working conditions for staff (e.g. working longer hours, working with larger groups of students, excessive reliance on fixed-term contracts specially for more junior staff in some systems, etc.), which can have a direct impact on quality.

Despite the greater specification of the 2015 ESG compared to 2005, interpretations still vary between institutions and subjects, and institutions in some countries are still largely unaware of them, although, as highlighted by some stakeholders interviewed this study, institutions still comply with them via the requirements imposed during external quality assurance. Thus, while ENQA membership and registration on EQAR are both attractive and quality assurance agencies have become important vectors of change to align with the ESG, stakeholder interviews revealed that it is not always clear for stakeholders how exactly the ESG should be translated into the actual practices of higher education institutions.

6.5 Conclusion

Substantial barriers to automatic recognition remain, and there is a lack of a strong framework linking quality assurance and recognition in practice

This chapter has reviewed national practices that link quality assurance to recognition. It has shown that there are still substantial barriers to automatic recognition. Few systems have fully implemented automatic mutual recognition, while many countries were reported to have achieved limited levels of implementation or no implementation at all. The examination of links between quality assurance and recognition reveals a diversity of different approaches to linking both in practice. The chapter shows that a detailed framework that links quality assurance and automatic recognition is currently still generally lacking in EU countries. Recognition is not sufficiently integrated into quality assurance processes, to ensure that it works automatically.

²⁰⁷ European Commission Progress Report 2018.

The links between recognition and internal and external quality assurance thus need to be enhanced, so that recognition procedures become a more important and visible part in regular quality assurance processes.

Further action is required to ensure the implementation and a more robust use of transparency tools

There is a need to ensure the implementation and more robust use of transparency tools, particularly some elements of the ESG and the European Approach, as also evidenced in other parts of this report. This may take the form of guidance provision, an update and reformulation of these tools or the provision of further regulatory or financial incentives (for example in the context of programme and module approval or renewal processes, or through EU project funding) to ensure implementation of these tools. A recent survey of European Student Unions by the QA-FIT project, for example, found that around three quarters agreed that ESG should provide more guidance²⁰⁸, and over half agreed that each of the three ESG parts should be revised.

²⁰⁸ <https://esu-online.org/publications/quality-assurance-fit-forthe-future-studentsperspective/>

7 The feasibility of a European Quality Assurance and Recognition System

This chapter looks at how to move forward on quality assurance and recognition in the EU and the feasibility of various options in this regard, informed by desk research, stakeholder interviews and the results of the experts' workshop carried out for this study. It summarises the key challenges that higher education institutions face when setting up transnational collaboration initiatives and on quality assurance and recognition (section 7.1), stakeholders' views regarding challenges and solutions (section 7.2) and what the building blocks of a future-proof European quality assurance and recognition system should be (section 7.3). The section then summarises how to move forward on enhanced quality assurance and recognition (section 7.4) and provides a roadmap regarding the implementation of the recommended option (section 7.5).

7.1 Challenges

Higher education institutions face multiple challenges when setting up transnational cooperation initiatives. Implementing quality assurance arrangements can generate complexity and barriers for transnational cooperation; more than one accreditation and quality assurance procedures may need to be followed in a joint programme. In addition, quality assurance procedures can be very focused on process and operational requirements and may not be clearly linked to teaching and learning and the quality of the learning outcomes or fundamental academic values, as highlighted by national stakeholders interviewed for this project. This is consistent with the results of the QA-FIT project survey of higher education institutions, which suggests that procedures to foster academic freedom are addressed to a large extent through internal quality assurance only according to half (53%) of respondents²⁰⁹. In addition, although quality enhancement is formally considered as a main purpose of quality assurance in a majority of national systems, a culture of quality enhancement may still need to be further developed²¹⁰.

Most of the stakeholders interviewed noted that quality assurance can entail significant administrative, and financial, costs²¹¹, making it a challenging undertaking. These costs are particularly significant at each reaccreditation at programme level²¹² and for the setup of joint educational programmes and transnational activities part of the European Universities alliances. These may require several external quality assurance procedures for each partner institution, when the European Approach cannot be used – the European Approach can be used as sole approach only in rare cases where all countries involved in the joint programme fully recognised the European Approach in place of a national accreditation without additional requirements, as noted earlier in this report. In addition, quality assurance processes can be lengthy preventing higher education institutions to respond quickly enough to emerging needs.

Recognition is not yet automatic in many countries and institutions, even in systems that are fully compliant with the ESG, as covered in the report on the implementation of the 2018 Council recommendation on the automatic mutual recognition of qualifications.²¹³

²⁰⁹ European University Association (2023) 'QA-FIT Quality Assurance Fit for the Future', p. 20.

²¹⁰ See section 3 and QA-FIT, which shows that for 55% of respondents' quality enhancement is a main purpose of external Quality Assurance, Brussels: European University Association, p.12

²¹¹ Sectoral representatives consensually agree that setting up joint programmes and other transnational activities can be administratively burdensome. It is however difficult to be very specific regarding the monetary costs of setting up joint programmes and transnational collaboration activities. A previous study on the State and effectiveness of national funding systems of higher education to support the European Universities Initiative, the authors have found that accounting systems in universities did not always clearly report on the costs of joint activities (due to the combination of funding streams and support in-kind). European Commission, Directorate-General for Education, Youth, Sport and Culture, Jongbloed, B., McGrath, C., Boer, H. et al., *Final report of the study on the state and effectiveness of national funding systems of higher education to support the European universities initiative*. Volume I, Publications Office of the European Union, 2023, <https://data.europa.eu/doi/10.2766/885757>

²¹² Interview, Austrian Federal Ministry of Education Science and Research, 12 August 2023.

²¹³ European Commission, 2018.

Finally, the follow-up to quality assurance evaluations for the purpose of quality enhancement remains unclear in many national systems. Only a few national systems appear to utilise quality assurance results for engaging in discussions and activities for the purpose of quality enhancement (e.g. Finland). National systems appear mostly focused on a formal decision, for example linked to accreditation or reaccreditation with unclear follow-up regarding quality enhancement. Similarly, the monitoring of the implementation of the recommendations related to the quality evaluation results also remains under-developed in many national systems. As noted in Chapter 3, follow-up to student evaluations is not the norm in many systems, as also reported by the QA-Fit project and the Bologna with Student Eyes 2020 report²¹⁴. The link between quality assurance and quality enhancement should thus be better addressed in many systems.

7.2 Stakeholders' views on the next steps for quality assurance and recognition

7.2.1 The regulator and quality assurance's perspective: ensuring common minimum standards

Given the above challenges and the limited and uneven implementation of key tools, such as the European Approach, stakeholders from quality assurance agencies represented in the experts' workshop saw a strong need to focus on encouraging further implementation of available tools and instruments in order to fully ensure common minimum standards as a basis for smoother cooperation and automatic recognition of qualifications as well as learning outcomes achieved during periods of study abroad²¹⁵.

7.2.2 The learner/student's perspective: combining quality enhancement with accountability

A representative from the European Students' Union emphasised the importance of focusing on the further implementation of key tools, and stressed that while encouraging quality enhancement is welcome, it is not incompatible with accountability.²¹⁶ The perspective from the European Students' Union implies advocating for a set of minimum agreed standards across Member States. In addition, in the context of transnational collaboration activities, achieving this minimum standard would suggest recommending Member States not only to allow but also to explicitly encourage the European Approach in law/national regulations, as some national authorities have done recently, for example in Romania. The European Students' Union's perspective implies ensuring common quality standards and practices across quality assurance agencies themselves through EQAR in order to limit the risk of 'shopping for more lenient agencies' when choosing an agency registered by EQAR to be evaluated. The European Students' Union also called for a stricter interpretation of the ESG and for adding additional key elements of focus in quality assurance, including the social dimension and fundamental values.

7.2.3 The view of higher education institutions and Alliance representatives: minimising administrative burden

Around half (45%) of respondents to the survey of higher education institutions undertaken as part of the previous triennial progress report on quality assurance in higher education²¹⁷ thought that their respective institutions did not have enough resources (not only financial, but also human) to be able to meet all their quality assurance requirements²¹⁸. Stakeholders representing higher education institutions and European Universities alliances in the experts'

²¹⁴ See <https://esu-online.org/bologna-with-student-eyes-2020/>

²¹⁵ See also interviews, for example Interview ENQA, 10 July 2023.

²¹⁶ Interview, European Students Union, 07 August 2023.

²¹⁷ European Commission, 2018, op. cit. p. 59.

²¹⁸ Interview, European Universities Association, 17 July 2023.

workshop aimed to minimise the administrative burden²¹⁹ and transaction costs related to joint programmes and other forms of transnational cooperation.

While higher education institutions and European Universities alliance representatives recognised the usefulness of key tools, they also flagged that more practical guidance and peer learning would be helpful to ensure these tools are implemented appropriately, particularly within the context of varying degrees of integration that alliances have, and were not favourable to additional regulations²²⁰. In their view, any changes should primarily come from demands from within the higher education sector, and from appropriate incentives.²²¹

7.2.4 Addressing specific cases related to the European Universities alliances and micro-credentials

Representatives from the European Universities alliances emphasised that the quality assurance of alliances should not be solely assimilated to the quality assurance of joint degrees, because of the innovative character of some of their programme offers. For example, the Young Universities for the Future of Europe (YUFE) offers a type of micro-credential called 'the Student Journey'. This micro-credential is non-compulsory and entirely open. It allows students to take on additional credits and non-academic activities. The Student Journey operates around a star system aiming to encourage mobility, entrepreneurial activities or the acquisition of new skills²²².

Discussions around the extent to which a separate (institutional) quality assurance procedure for European Universities alliances would be necessary, bring added value, and could be accepted by national systems are still at an early stage and ongoing, e.g., in the context of the peer learning activities in the IMINQA project²²³. Respondents to the QA-FIT survey of institutions expressed divided views in this regard.

The experts who took part in the workshop recognised the need to address the challenges faced by European Universities alliances, recommending a solution that is fit-for-purpose and limits the risk of duplication of procedures.

The options proposed in the next sections focus on encouraging the further implementation and articulation of existing tools around a coherent vision to be provided by a revised Council Recommendation on a European quality assurance and recognition system.

7.3 Building blocks

The aforementioned challenges require a shared commitment to be addressed. This study identified five interdependent building blocks to move forward in quality assurance and recognition in the EU. These building blocks are based on existing quality assurance and recognition tools supported in the Council Recommendations of 2006, 2018 and 2022.

²¹⁹ Interview, YUFE, 13 July 2023. Interview, Irish National Forum for the Enhancement of Teaching and Learning, Higher Education Authority, 05 September 2023.

²²⁰ European Commission, 2018, *op. cit.*, p. 85, interview, European Universities Association, 17 July 2023; EURASHE, 14 July 2023; DAAD, 07 August 2023.

²²¹ Interview, European Universities Association, 17 July 2023.

²²² Interview, YUFE, 13 July 2023.

²²³ IMINQA Implementation and Innovation in Quality Assurance through Peer Learning. Interview, EUTOPIA, 4 July 2023. Interview, YUFE, 13 July.

Figure 20. Building blocks: European Quality Assurance and Recognition System



Further details on these blocks are provided below:

- **A shared willingness to pursue the next steps in quality assurance in higher education and learn from successful experiences and pilot projects.** The European higher education system offers a model of cohesion and buy-in in comparison to other regions of the world, which have looked to Europe to create common higher education areas, for example in Asia (ASEAN), Latin America, the USA, and Africa²²⁴. This common drive for cohesion constitutes an essential building block for further steps in quality assurance and recognition in the EU.
- **A joint commitment to ensure continuing relevance in quality assurance, so that higher education meets current and emerging needs and trends.** For example, in terms of better incorporation of the social dimension, the green and digital transition,

²²⁴ Interview, European Universities Association, 17 July 2023. See also the ASEAN Quality Assurance framework AQAF and the African Standards and Guidelines for Quality Assurance. The influence of European developments across the world has been documented by a growing body of academic literature. See for example: Que Anh Dang (2015) 'The Bologna process goes East? Third countries to prioritising interregional cooperation between the ASEAN and the EU', in the *European Higher Education Area*, 763-83. Brunner, J. 'The Bologna process from a Latin American perspective', in *Journal of Studies in International Education*, 13(4). Kassaye Alemu, S. 'African higher education and the Bologna process', in *European Journal of Higher Education*, vol. 9, 118-32. Adelman, op. cit.

employability, academic integrity and fundamental academic and European values, as specified earlier in this report.

- **Supporting the adoption of institutional external quality assurance across the higher education system.** Institutional external quality assurance can provide a comprehensive way to review the quality of higher education institutions, and does not necessarily need to be solely focused on operations or processes. This approach takes into account not only individual programmes, but the whole institutions' mission, governance, resources and support services, thus providing a holistic view of institutions -see also Chapter 4. It can help identify systemic issues that affect multiple programmes or departments (which can help inform institutions' resource allocation into areas where there are widespread needs for improvement), as well as pockets of good practice that could be spread across the institution. It can contribute to ensuring consistency and coherence in the quality of education across programmes, and simplify processes. It should be based on the institution having a mature internal system to assure the quality of its programmes (which could be assessed as part of self-reviews or expert visits – see the example of Finland in Section 7.4.3 below). For European Universities alliances, which may involve several joint programmes and activities, the move toward institutional-based quality assurance conducted by an EQAR-registered agency, would contribute to simplifying the administrative procedures related to these joint activities.
- **Full implementation of agreed quality assurance frameworks and tools, especially the European Approach and the ESG.** These tools are consistently perceived as robust, useful and well-designed by EU and national stakeholders. However, implementation has been uneven. Further efforts to consistently implement the European Approach are particularly urgent to facilitate the development of joint programmes and reduce the administrative and transaction costs related to quality assurance. There are multiple benefits in joint transnational programmes being accredited and externally quality assured following one European framework and one corresponding quality assurance procedure, instead of being subject to multiple (national) quality assurance frameworks and procedures that may be conflicting and burdensome.
- **Enhancing links with recognition:** Automatic mutual recognition, as defined in the 2018 Council Recommendation, should be implemented in all EU Member States and should be further linked to quality assurance processes – in terms of quality assurance processes' incorporation of the examination of automatic recognition procedures, and in terms of recognition procedures trusting quality assurance processes undertaken elsewhere by agencies registered in EQAR. Trust building through mutual cooperation in quality assurance could constitute an asset to support the implementation of automatic mutual recognition.

7.4 Recommendations/options for a move toward enhanced quality assurance and recognition

Given the challenges identified earlier in this report, a move from the status quo is required. This section focuses on options to make quality assurance systems in European higher education more future-proof and facilitate transnational cooperation in the new context provided by European Universities alliances. The section starts by outlining suggestions which are transversal to all quality assurance systems before discussion options tailored by type of quality assurance system currently prevalent in the EU.

7.4.1 Transversal recommendations

Stakeholders agree that all types of quality assurance should build on the respect of diversity of national systems and types of providers in higher education; on European fundamental and

academic values (including integrity), the social dimension²²⁵, employability and on the green and digital transitions. The ESG provide limited guidance on the role of higher education in promoting democratic and inclusive societies, which are recognised as integral components of European values²²⁶. However it was digitalisation, in particular, that was identified by the interviewed stakeholders as requiring greater attention in quality assurance. This aligns with the more recent results of the QA-FIT project, which found digitalisation of learning and teaching as the most popular topic for expanding Part 1 of the ESG²²⁷, followed by cooperation with labour market and its relevance for higher education.

Rapid technological developments, such as those in the area of AI, and their uncertain implications for higher education, need to be better reflected in quality assurance systems and procedures. In addition, digitalisation plays an important facilitating role in the conduct of quality assurance and recognition: it can support the provision of transparent information, support interoperability, speed up processes, for example by having electronic diplomas being issued to reduce the transaction costs linked to quality assurance and recognition (as currently actively promoted in Spain)²²⁸, and improve trust and confidence in processes.

Regarding the green transition, the European Union could consider extending the use of labels to an environmental-friendly label for higher education institutions, similarly to product labels ÖkoControl in Germany and SWAN in Finland or encourage the use of existing labels²²⁹. It can also provide common guidelines towards greener universities and promote greater monitoring of the environmental policies and practices of universities through quality assurance processes.

7.4.2 For countries with a programme approach -facilitate quality assurance of joint programmes and micro-credentials

7.4.2.1 Facilitating the quality assurance of joint programmes

Countries with a programme-based approach to quality assurance have relevant tools to facilitate the quality assurance of joint programmes. They can use the European Approach: joint transnational programmes are accredited and externally quality assured by one single quality assurance agency registered in EQAR with the outcome of that quality assurance process being recognised in all other countries represented in the programme, instead of being subject to multiple (national) quality assurance frameworks and procedures that may be conflicting and burdensome.

However, as the European Approach is not yet implemented across the entire EU, there is an urgent need for Member States to continue the further implementation and promote the use of the approach, and to remove any additional national criteria, procedural requirements or steps that limit or prevent its use, as well as work on other barriers identified in this report, such as lack of awareness. Some countries not yet allowing the use of the European Approach are represented in a large number of European Universities alliances, thus affecting these.

To maintain a flexible approach, all higher education institutions should have the option to adopt the European Approach while still having the option to undergo reviews under different national requirements if they wish. The European Commission could focus efforts on providing and supporting information exchange and peer-learning about implementing the European

²²⁵ Interview, European Association of Institutions in Higher Education EURASHE, 14 July 2023; Interview European Students Union ESU, 07 August 2023.

²²⁶ Jungblut, J., Petö, A. and Stensaker, B., 2023. European values and external quality assurance. *Circle Uni. European University Alliance, Oslo*. <https://www.circle-u.eu/about/publications/national-conferences/european-values-and-external-quality-assurance.pdf>

²²⁷ <https://www.eqar.eu/publication-of-qa-fit-analysis/>

²²⁸ Also flagged by Gunnar Vaht from Estonian ENIC/NARIC.

²²⁹ Interview, European Universities Association EUA 17 July 2023.

Approach, targeting Member States, Quality Assurance Agencies and higher education institutions. This could build on the successful activities implemented in the ImpEA and IMINQA projects, for example.

Another option to reduce administrative costs would be to limit programme accreditation to an initial accreditation of new programmes, without reaccreditation requirements, a change which has recently taken place in Austria (in 2021). This system should be designed to minimise unintended consequences, such as the creation of incentives for modifying existing programs over pursuing more 'radical' innovation through the creation of new programmes, which could stifle innovation.

Over time, higher education institutions could be further encouraged to demonstrate the full functioning of their internal quality assurance arrangements through an institutional accreditation/audit and become exempt from programme accreditation following the goal formulated by Recommendation Seven of the 2022 Council Recommendation on building bridges.

7.4.2.2 Facilitating the quality assurance of micro-credentials

As discussed in Chapter 4, some national authorities have started to consider how to quality assurance micro-credentials, but this remains an emerging topic. Stakeholders agreed that it was essential for trust and recognition to have a suitable approach for the quality assurance of micro-credentials. In line with the focus of the European Approach on micro-credentials laid out in 2022 and the Microbol project's conclusions, the European University Association and most other stakeholders agreed that the external quality assurance of micro-credentials should remain at the institutional level – as also noted in Chapter 4. Where no institutional external quality assurance exists directed specifically to micro-credentials, these could be reviewed in clusters and as part of existing quality assurance procedures for the programme, group or discipline the micro-credential relates to. It is also worth noting that a diverse ecosystem of micro-credential types is consistent with the broad EU definition, and these different types may also relate to external quality assurance differently²³⁰. For example, 'skills credentials' which are very short in duration and awarded in the context of non-formal learning are rarely covered by external quality assurance, whereas short learning programmes, which are longer, typically consisting of more than one learning unit, and are awarded in the context of formal learning are generally subject to external quality assurance²³¹.

External programme accreditation should not be translated/extended to assurance of single micro-credentials. Given the time it would require accrediting single micro-credentials this would risk making higher education institutions less agile in developing micro-credentials and could also lead to external accreditation system overload. Given the anticipated large volume of micro-credentials, such an approach could become overly resource-intensive²³². As previously discussed in this report, consideration could therefore be given to whether existing European tools, such as the ESG, can be directly applied or should be modified to quality assure micro-credentials keeping proportionality with the nature of these qualifications.

7.4.3 Quality assurance of institutions

An institutional approach to external quality assurance should continue to ensure accountability and secure transnational trust, facilitating transnational cooperation and

²³⁰ Hudak, R. and Camilleri, A. F., and (2018) The Micro-Credentials Users' Guide. MicroHE Consortium.

https://microcredentials.eu/wpcontent/uploads/sites/20/2021/05/D3_3_MicroHE-Users-Guide.pdf

²³¹ See ETF (2022) Guide to design, issue and recognise microcredentials. <https://www.etf.europa.eu/sites/default/files/2023-05/Micro-Credential%20Guidelines%20Final%20Delivery.pdf>

²³² Interview, European Universities Association representative, 17 July 2023.

provision of education building on Recommendation Seven of the 2022 Council Recommendation. For higher education institutions, institutional quality assurance requires administrative capacity, a robust internal quality assurance system and ideally a strong quality culture, especially if the goal is to move away from external programme accreditation/ quality assurance and hence for institutions to self-accredit programmes²³³. Depending on the system only some institutions in the sector might already be in a position to assume full responsibility for their quality assurance. Institutional quality assurance is sometimes preferred by larger universities, who have the administrative capacity to undertake this exercise and for whom cost savings are significant, compared to smaller or private providers for whom the cost-benefit analysis can be different²³⁴.

The question of whether the institutional-level approach should become the sole approach remains a topic of debate among stakeholders. Some national stakeholders provided positive feedback regarding the move towards institutional-based quality assurance as is the case in Belgium Flanders, following the pilot trial which took place between 2015 and 2017 and led to the new institution-wide Flemish system of quality assurance implemented in 2019²³⁵.

On the other hand, several other stakeholders are in favour of maintaining some programme-based external quality assurance, at least transitionally²³⁶. In particular, students and quality assurance agencies consider that not all EU higher education systems have a mature enough quality culture and robust internal quality assurance yet to underpin such a transition.

There are concerns from stakeholders and student representatives regarding the fact that institutional quality assurance focuses more on processes and operation than content²³⁷. From the perspective of certain stakeholders, a flexible approach would be preferable, based on the option to choose institutional quality assurance (or not), as is the case in Germany or the Netherlands; or with the option to have the focus areas of quality assurance evolving based on stakeholders needs, as is the case in Finland (see below)²³⁸. Introducing specific thematic issues in quality assurance when they become relevant or problematic broadens quality assurance and allows quality assurance systems to concentrate on the most pressing topics when there is some concern at the national level, or within quality assurance agencies and higher education institutions. The box below provides some examples of how internationalisation is included in some quality assurance systems across the EU.

²³³ The introduction of self-accreditation is planned in the Czech republic through a new law, interview, national accreditation office for higher education, 20 July 2023.

²³⁴ Interview, DAAD, 07 August 2023. Country desk report, Netherlands.

²³⁵ National consultations conducted as part of the country research on Belgium.

²³⁶ Interview, DAAD, 07 August 2023. Country desk report, Netherlands.

²³⁷ Interview, Ministry of Higher Education, Slovenia, 03 August 2023 and Workshop 07 November 2023

²³⁸ Interview, DAAD, 07 August 2023; Workshop, 07 November 2023.

Internationalisation in QA, some examples

The number of incoming international students is considered in internal and external quality assurance in a number of countries. Quality assurance is often concerned with how many international students a particular higher education institution has managed to attract, the capability of a particular higher education institution to receive international students and the ability of a particular higher education institution to maintain the satisfaction levels of international students. Interview respondents from Lithuania and Finland indicated that internationalisation is often discussed in the strategic documents of higher education institutions. Quality and Qualifications Ireland has taken a different approach and awards an International Education Mark to higher education institutions that demonstrate their fitness to enrol international students. The Dutch higher education institutions signed the Code of Conduct, which guarantees the quality standards of higher education provided to international students. For example, it includes provisions on the quality of study programmes and requirements for admission of international students among others. We found that little attention was paid to the outgoing student body by quality assurance agencies in most countries and it was rarely mentioned by respondents when talking about the internationalisation of higher education.

The option to self-accredit reduces administrative and transaction costs linked to obtaining accreditation for joint programmes in particular, while institutional quality assurance and the application of the ESG would ensure the application of commonly agreed quality standards and ensure the institutional ownership of transparency tools²³⁹. Further efforts should be made to promote that internal quality assurance of joint programmes align with the European Approach and the ESG to ensure a common standard and facilitate cooperation. As the use of the European Approach in internal quality assurance would likely become more widespread following a shift towards greater institutional external quality assurance, future versions of the European Approach could include some more details and guiding principles on its use in internal quality assurance, e.g. concerning publishing the results of internal quality assurance processes.

The Finnish quality assurance system represents an interesting application of institutional quality assurance and self-accreditation, where excellence in higher education is driven by a collaborative approach to quality enhancement.

²³⁹ Interview, Irish Technological and Higher Education Association, 29 August 2023.

Quality enhancement in institutional quality assurance in Finland

Finland has a long tradition of institutional quality enhancement-led assurance. Institutional audits have been organised since 2005 and are now in their third cycle. Institutional quality assurance in Finland relies on a self-evaluation conducted by the higher education institution following the audit manual²⁴⁰ of the national Quality Assurance Agency and an institutional visit by an external audit team (two members from higher education, one student representative and one representative of the labour market) as well as the project manager representing the Quality Assurance Agency. The external experts are trained by the Quality Assurance Agency. The audit team then writes a report and gives the result of the institutional quality assurance/audit.

The audits take a holistic approach covering all the activities of higher education institutions. The focus of the audit is on the procedures used by the higher education institutions to maintain and enhance the quality of its activities, which is assessed in four evaluation areas:

- the higher education institution creates competence,
- the higher education institution promotes impact and reforms,
- the higher education institution enhances quality and wellbeing, and
- the higher education institution as a learning organisation (the higher education institution selects an evaluation topic for the fourth evaluation area).

The audits evaluate to what extent the quality work in the higher education institution meets the ESG and assess whether the quality system produces relevant information for continuous development. The audits involve the entire higher education community: higher education staff and students as well as external stakeholders, in identifying the institution's strengths, good practices and enhancement areas.

The institutional quality assurance results lead to the acquisition of a quality label for six years and the results are entered into a register maintained by the Finnish Education and Evaluation Centre FINEEC and published in DEQAR. Once the higher education institution has passed its audit, it can self-accredit programmes.

One of the main advantages of the Finnish system is that institutional quality assurance is built into a **quality enhancement** process:

- there is no negative consequence to the institutional quality assurance. If an institution fails the audit, it will need to go through another audit two to three years later,
- enhancement-led principles guide the audit process. The purpose is to support the continuous development and improvement of the activities of higher education institutions as a whole,
- the quality enhancement element of quality assurance in Finland is based on exchanges and participation, and
- higher education institutions that receive excellent mark in one of the assessment areas can participate in the excellence quality seal competition, which provides the higher education institution with visibility and enhances its reputation of excellence. The Higher Education Evaluation Committee reviews the proposals and awards the Quality Label for Excellence annually.

Another way to support quality enhancement is **benchlearning**, where higher education institutions can choose their own evaluation theme and the benchmark organisation, which can be another higher education institution of their choice from Finland or abroad or any other organisation they collaborate with to receive feedback on their activities and to learn from their good practices. Benchlearning is embedded in the audit design. ENQA has commended the Finnish model for its use of benchlearning as a way to embed innovations in its 2021 review (Maguire et al, 2022). For instance, in the University

²⁴⁰ See https://www.karvi.fi/sites/default/files/sites/default/files/documents/FINEEC_Audit-manual-for-higher-education-institutions_2019-2024_FINAL.pdf

of Turku chose sustainable development as its evaluation theme and the University College Cork as a benchmark organisation²⁴¹.

Following the quality assurance audit, higher education institutions also exchange and discuss feedback through an annual meeting organised by FINEEC. Every year higher education institutions audited three years prior share their audit results and how they have moved toward the recommendations provided by the quality assurance audit. The recommendations and process are enhancement -led, because they aim to support the higher education institution to reach its own targets.

The higher education institution gives feedback to FINEEC on the audit process to enhance FINEEC's activities. This feedback is taken into account when shaping the following rounds of quality assurance.

Each cycle of institutional quality assurance is evolutionary and adapted to needs. For example, the ongoing third cycle of institutional quality assurance focuses on institutional strategy, supporting the higher education institutions in achieving their goals, student-centred approach and the impact of higher education institution's activities. The current third cycle comes to an end in 2024. The new model will be launched in 2026-2027 to take into consideration the forthcoming revision of the ESG as well as the feedback and ideas from the higher education institutions.

Other advantages of institutional-based quality assurance in Finland include:

- the costs related to quality assurance are minimised when creating new programmes because higher education institutions can self-accredit their programmes (including those leading to micro-credentials), and they do not have to go through a central system,
- higher education institutions have the option to choose any EQAR registered agency for their institutional QA (although all of them have chosen FINEEC so far),
- the same institutional quality assurance applies to the whole sector, which ensures consistency and comparability in quality assurance results, and
- the results are transparent: higher education institutions self-assessment reports are published together with the assessment text of the audit team on the FINEEC's digital audit platform.

One final point for potential improvement would be, in terms of monitoring, to achieve a user-friendly overview of the performance of the whole higher education system beyond the data collected by national ministries.

7.4.4 Future step – the quality assurance of European Universities alliances

Building on the institutional quality assurance model explained in the previous section, as well as on Recommendation Seven of the 2022 Council Recommendation on building bridges, European Universities alliances could, as noted, develop alliance-wide cross-institutional internal quality assurance within which the Alliance could self-accredit (or re-accredit) programmes once they have successfully passed a cross-institutional external quality audit.

7.4.4.1 The benefits of an institutional quality assurance of European Universities alliances

The benefits of this proposed quality assurance system for European Universities alliances and its added value need to be clear, as existing Alliances or other consortia would be unlikely to choose an (additional) audit if no clear benefits are associated to it.

Some of the potential benefits include a reduction of the administrative burden and transaction costs when setting up joint programmes/transnational activities for higher education institutions members of European Universities alliances and quality assurance and accreditation agencies. This would apply to all activities that are covered by the alliance's joint internal quality assurance system. Given their different ambitions, sizes and levels of integration, European

²⁴¹ See the 2023 audit report in English: <https://auditoinnit.karvi.fi/luvut/abstract-33/en/>

Universities alliances will need flexibility to decide which areas of (joint) activity to cover in their joint internal quality assurance and the external audit will need to be tailored in response. To realise actual efficiencies, higher education institutions going through this external institutional quality assurance would need to gain the right to self-accredit programmes that are subject to the joint internal quality assurance. This will require commitment from national authorities as well as possible regulatory changes in many Member States.

The implementation of this proposed option by European Universities alliances' partners could also increase chances of access to further EU funding (an important consideration for alliances, which received a term-limited grant²⁴²), as it could be considered favorably in relevant funding applications -given that application for EU funding for Alliances require applicants to explain their activities and processes related to quality assurance.

7.4.4.2 Further specifications

This approach could build on existing efforts to develop European-wide frameworks for European Universities alliances. This includes for example the European Framework for the Comprehensive Quality Assurance of European Universities developed by EUniQ, a project coordinated by the quality assurance accreditation organisation of Flanders and the Netherlands, which included 15 other national and EU relevant stakeholders²⁴³. EUniQ suggests an approach based on a set of criteria to evaluate European Universities in relation to their stage of development, which is valid for the development of both internal and external quality assurance for European Universities alliances.

EUniQ tools may be used to facilitate the accreditation of programmes once higher education institution members of Alliances have gone through the EUniQ procedure. Since the conclusion of the EUniQ project, one key policy development has been the discussion around a European Degree and the piloting of a European Degree label. In order to avoid duplication and ensure that a new framework for cross-institutional external quality assurance is attractive, the use of the label could be linked to it -see Chapter 4. As a result, one element to include beyond the present EUniQ framework would be the Alliance's capacity to assure – as part of its internal quality assurance – alignment with the European Degree criteria for the relevant programmes.

Using the European Approach as a reference point for the internal quality assurance of alliances and a future framework for cross-institutional external quality assurance would further ensure its robustness and suitability. Some Alliances already use the European Approach when developing their quality assurance for joint programmes, as is the case of the Alliance Young Universities for the Future of Europe (YUFE), including for the development of joint bachelor's degrees²⁴⁴. YUFE could also be considered as a relevant example when considering the next steps in the quality assurance of the European Universities alliances. The YUFE framework is based on five pillars: trust and appreciative approach, subsidiarity and shared ownership, continuous improvement, transparency and involvement of stakeholders and a common set of quality assurance indicators on accessible information, stakeholder satisfaction and stakeholder participation. YUFE partner institutions and programmes are accredited by EQAR-registered agencies, aligning with ESG standards, which establishes trust within the YUFE Alliance²⁴⁵.

²⁴² Interview, University of Vienna, 01 August 2023.

²⁴³ For more information on the EUniQ project and its framework, see <https://eua.eu/resources/projects/811-euniq.html>EUniQ (NVAO)

²⁴⁴ See De Schepper, A. and Deluka Tibljaš, A. (2023) 'Building a sustainable QA system for university alliances' European Quality Assurance Forum. University of Aveiro, 22-25 Nov.2023. https://www.eua.eu/downloads/events/8_de%20schepper_opdenacker_deluka_pavletic-updated.pdf

²⁴⁵ See also Ann De Schepper, Opdenacker, L., Deluka Tibljaš, A. and Pavletić, D. (2023) 'Internationalisation in a changing world: new trends and challenges for quality assurance' https://eua.eu/downloads/publications/8_de%20schepper_opdenacker_deluka_pavletic%201.32.pdf

Three partners in YUFE have set up a work package on the quality culture²⁴⁶. YUFE partner universities rely on the quality assurance and accreditation of study programmes in the home countries. If programme components/credits are quality assured in the country of one partner university, the quality assurance of the home country is valid across the other partner universities. In addition, YUFE is setting up a joint bachelor programme that will be quality assured using the European Approach. To do so, the YUFE work package leads will check which partner countries accept the European Approach, under which conditions and clarify any additional requirements, i.e. accreditation or similar procedures.

According to stakeholders from higher education institutions, the system would need to remain flexible enough to suit Alliances at different levels of integration, sizes, and ambitions in order to preserve diversity²⁴⁷. It will also be necessary to detail the objectives of the system based on its fitness-for-purpose and coherence with other EU or national initiatives. For example, some stakeholders suggest that the procedure should also serve to “become” a European Universities alliance, i.e. a consortium could use the term “European University” based on passing a cross-institutional audit, regardless of whether the consortium is funded under the Erasmus+ calls for alliances or differently.

Based on the successfully piloted EUniQ framework and the further stakeholder discussions summarised above, the basic elements for a cross-institutional audit of European Universities could be proposed by the European Commission. In a second step, the European Commission could collaborate with the relevant key stakeholders to develop a detailed process/evaluation methodology, using EUniQ as a starting point and incorporating both the European Approach and the European Degree criteria. The option of having a specific EU-level accreditation agency was dismissed by most stakeholders during the experts’ workshop of 07 November 2023, while all stakeholders agree that such an audit should be performed by one EQAR-registered agency, as it would be based on the ESG.

7.4.4.3 Supporting institutional quality assurance through peer learning

Peer learning could also be used for quality enhancement and capacity building based on a similar model to the one observed in Nordic countries:

- In Finland a higher education institution can choose to collaborate with another higher education institution, including one from abroad, as a benchlearning exercise, to exchange on institutional quality assurance results, and there is an opportunity for the entire higher education sector to share experiences and learn from Quality-Labelled higher education institutions, as described in section 7.4.3. Three years after the audit the higher education institutions provide feedback on the work carried out. This practice is a seminar-based follow-up mechanism.
- In Norway, higher education institutions are grouped according to their characteristics, for mutual learning: for example, if they have recently merged, have several campuses, with the same authorisations, or teaching the same disciplines. To encourage collaboration and sharing, each ‘audit heat’ includes 4-6 higher education institutions, encouraged to exchange about their quality assurance work through a meeting organised by the Norwegian Agency for Quality Assurance in Education NOKUT 4-5 months before the final audit submission²⁴⁸.
- In Sweden, several universities have, on their own initiative, created networks which have established their own evaluation panels, that work as peer review bodies²⁴⁹.

²⁴⁶ Interview YUFE, 13 July 2023.

²⁴⁷ Interview, NVAO, 07 July 2023.

²⁴⁸ ENQA ‘A brief description of the quality assurance system in Norway’, in URL: [NOKUT.pdf \(enqa.eu\)](https://www.enqa.eu/en/nokut)

²⁴⁹ European Commission, 2019: 30, Ibid.

In an EU version of this model, groupings of universities would exchange ideas and feedback about quality assurance before external institutional quality assurance. A university or a group of universities could choose another university of its choice for benchlearning as is the case in Finland. At the level of a European Universities alliances, cross higher education institutions quality boards could be encouraged to act as a springboard for these exchanges.

Peer learning activities would have a practical focus, to provide guidance and exchange ideas as well as to act as a motivator for higher education institutions and stakeholders to implement the relevant tools. Such an exchange would be informative not only for higher education institutions with similar quality assurance systems, but also for those from different quality assurance systems, in order to learn from these different processes.

In addition, in the specific context of the European Universities alliances, and given the diversity of transnational activities planned, the EU could encourage the set-up of a charter for transnational activities. The European Charter for Higher Education (ECHE) could be used as a blueprint for or be expanded to a charter for Alliances.²⁵⁰ The charter of transnational activities for European Universities alliances would set out the objectives, mandate and standards that Alliance partners would commit to and include recommendations regarding the quality assurance of Alliances as specified above -which go beyond the quality assurance of mobility activities as already included in the current ECHE.

The exchange could benefit from further support from EU Erasmus+ funding. The benefits of this exchange would be to support the achievement of the European Education Area/European Higher Education Area by enhancing mutual understanding and trust related to the quality assurance arrangements pertaining to each partner higher education institution, to ensure mutual understanding, to discuss how to overcome potential institutional barriers to collaboration which may be linked to institutional culture or tradition and to promote a 'quality culture' in each higher education institution. They could be particularly useful for European University alliances as they explore new models for quality assurance.

Peer learning of higher education institutions across quality assurance systems could also support the development of quality assurance in systems which are still in development, as in Estonia where an interviewed stakeholder flagged that good practices and solutions are still necessary to develop quality assurance for transnational collaboration activities.

7.5 Implement automatic recognition based on a common quality assurance framework

A common quality assurance framework also forms the basis for automatic recognition, as already pointed out in the 2018 Council Recommendation. Future steps to achieve automatic recognition would be based on three pillars: a coherent vision, practical guidance and capacity building through peer learning and monitoring.

7.5.1 A coherent vision

This vision would focus on connecting the dots between the range of established tools, including the European Approach and the revised ESG and Council Recommendations, including the 2022 Council Recommendation and the 2018 Council Recommendation,²⁵¹ together forming a coherent set of minimum standards and tools for transparency and trust.

²⁵⁰ Erasmus Charter for Higher Education | Erasmus+ (europa.eu)

²⁵¹ The Convention on the Recognition of Qualifications concerning Higher Education in the European Region (ETS No. 165) of 11 April 1997, known as the Lisbon Recognition convention, has as a key principle for the recognition of qualifications that there should be no substantial difference between the outcomes of the foreign qualifications and the outcomes of the desired activity. The 2018 Council Recommendation goes a step further by specifying framework conditions within which qualifications from another MS should go through recognition procedure. In this case, the 2018 Council Recommendation specifies that

This vision would link all aspects related to automatic mutual recognition and quality assurance, in addition to ensuring that recognition is included in external quality assurance processes when these are carried out, as already argued in this report. In this vision, all accredited higher education institutions will be registered in DEQAR, they will be institutionally quality assured by EQAR-registered agencies and will self-accredit programmes. Based on this system, higher education institutions that are in European Universities alliances will have formed ever stronger synergies and multiplied innovative collaboration activities and programmes.

DEQAR will serve as a central digital register that students and employers will easily be able to access to obtain information on the quality of higher education institutions and the study programmes that they may wish to pursue, and for which the qualifications will be automatically recognised. Key European values and the notion of sustainability will feature in the quality assessment of these programmes, for example through the award of labels.

Students and the European labour market will benefit from a diversity of study programme offers from across the EU that they can easily choose from to meet their needs. The European Education Area and the European Higher Education Area will thrive as models of excellence for the rest of the world. The implementation of this vision will be clearly linked to access to EU funds, as determined in the forthcoming Multi-annual Financial Framework.

7.5.2 Supporting implementation through practical guidance and peer learning

The framework would also support the implementation of this vision through practical guidance on recognition issued to higher education institutions, national authorities and employers. The practical guidance in the framework could include a toolkit or user guide, focused on user-friendly illustrative examples and answers to common questions on key aspects, such as the move toward institutional quality assurance and self-accreditation²⁵². Guidance documents would feature some key elements of the quality assurance of recognition procedures to facilitate automatic mutual recognition, including a clear definition of key concepts such as automatic mutual recognition²⁵³, how to determine whether a qualification is automatically recognised, and the separation of recognition from admission. The guidance could encourage higher education institutions to monitor and collect data gathering quality assurance and recognition (rather than admission) through the mention of relevant examples.

This practical guidance would complement the material already published, including the ECTS Users Guide, the toolkit to the European Approach, and the ESG.

Practical guidance could be shared through peer learning activities, as mentioned in section 7.4, for benchlearning, quality enhancement and capacity building, including Alliance members or more generally higher education institutions interested in transnational collaboration activities.

7.5.3 Monitoring to support improvement and potential digital solutions

The common recognition framework should also encourage a follow-up of quality assurance evaluations through monitoring. At EU level, it could be encouraged to establish standardised

qualifications should be recognised without additional procedure if Bologna and EU transparency tools are fully applied in the issuing Member State.

²⁵² Interview, European Universities Association, 17 July 2023.

²⁵³ Interview, DAAD, 07 July 2023.

and thus comparable statistics on recognition based on data from NARICs or higher education institutions so as to monitor implementation of the Council Recommendation on automatic mutual recognition.

Digital solutions have the potential to catalyse the automatic recognition of qualifications. Digitally issued qualifications based on the EU infrastructure for digitally issued qualifications (European Digital Credentials for Learning, EDC) would eliminate the need to verify the authenticity of documents. As qualifications are described in line with the standardised European Learning Model (ELM), which *de facto* integrates the information contained in a Diploma Supplement, the higher degree of uniformity will make qualifications more readable and understandable.

At the level of the EU, further possibilities lie in expanding DEQAR to include a database of all joint programmes²⁵⁴ or qualifications which can be automatically recognised from higher education institutions quality assured by an institution registered in EQAR.

The mobility scoreboard indicators on national policy reforms relevant to recognition or mobility could also be extended to track the implementation of relevant Council Recommendations. In addition, while quality assurance reports are publicly available across most national systems, further efforts should be made at the national level for these results to be more user-friendly for the general public (i.e. publishing shorter results with limited technical references) and in a language accessible across the EU, i.e. English for example²⁵⁵.

8 Conclusions and recommendations

This chapter summarises the study findings and the resulting recommendations for further developments at the level of the European Union, Member States and the higher education sector.

8.1 Main findings and recommendations

8.1.1 Regarding the overview of types and purposes of QA

Quality assurance systems have evolved substantially since the adoption of the 2006 Council Recommendation on further European cooperation in quality assurance in higher education. The motivations for these changes are varied, but internationalisation has been an important element. Various countries have introduced changes to better align their quality assurance systems to the ESG, the European Approach or other EU or European Higher Education Area policies and recommendations, while respecting national differences.

The thematic focus of European cooperation in quality assurance in higher education has been expanding over time - as reflected in the themes covered by the ESG 2015 compared to their 2005 version. Nonetheless, today the policy context and the priorities of the European Education Area have made a wider set of issues, such as the social dimension, the green and digital transition, employability, academic integrity and fundamental academic and European values increasingly relevant, and worthy of more central consideration.

²⁵⁴ Interview, French Speaking part of Belgium Quality Assurance Agency AEQES and Belgium Ministry of the Wallonian federation DGESVR, 01 October 2023. These interviewees also flagged that evaluation reports published on DEQAR could also be more consistently tagged as linked to the European Approach of Joint Programmes when applicable.

²⁵⁵ Interview, Ministry of Higher Education Slovenia, 03 August 2023..

8.1.2 Implementation of the 2006 recommendation on European cooperation in quality assurance in higher education

The 2006 Recommendation, in its current form, does not provide sufficient political direction for the future.

There has been clear progress in the implementation of most of the recommendations contained in the 2006 Council Recommendation. However, seventeen years after the adoption of the Council Recommendation: allowing higher education institutions to work towards a complementary assessment by another agency in a European quality assurance register (EQAR). A good level of implementation has been achieved in relation to the introduction of rigorous internal quality assurance systems in accordance with the Standards and Guidelines of Quality Assurance of the European Higher Education Area (ESG) and membership and registration in EQAR. There has tended to be greater progress in relation to recommendations that do not explicitly require international cooperation than in relation to those that refer more directly to this type of cooperation. Implementation of the recommendation on higher education institutions being able to choose among quality assurance or accreditation agencies in the European register has been particularly sluggish.

Recommendation 1: *Target additional support to EU Member States that would benefit from it to speed up implementation. This support could include mutual learning activities, particularly on the recommendations for which a large degree of variation in terms of implementation remains.*

Recommendation 2: *There is a need to update or replace recommendations which are no longer relevant, because they have been completely achieved, or because only a small set of countries remains to achieve them, and should include new areas of key importance for the future of European higher education²⁵⁶.*

8.1.3 The European Approach for the quality assurance of joint programmes

This report analysed the advantages of the implementation of the European Approach, which provides a common framework through a set of agreed European standards, for facilitating international cooperation, promoting a shared quality culture and the setting up of joint programmes. However, progress on its implementation has been slow. EQAR data shows only 23 joint programmes that made use of the European Approach for the period 2016-2023, and does not show a marked increase in the use of the European Approach since 2019.

The research identified several barriers to the use of the use if the European Approach, including unfavourable and restrictive national regulations as a main obstacle. The use of the European Approach remains hindered further by lack of knowledge about it and its benefits among other factors. At the time of writing some EU Member States still do not have a single higher education institution that has used the European Approach, according to EQAR data.

Recommendation 3: *Given the strong support for the European Approach encountered during this study, measures should be taken to overcome the barriers to its implementation. Member States should systematically embed the European Approach in national legislation as a first step, but also make sure that substantive quality assurance requirements at the national level (e.g. in terms of staffing, assessment and other areas) can be flexible enough not to hamper international cooperation. This should be complemented with more effective dissemination on what the approach means, and its benefits. It is important to continue sharing good practices through networking in quality assurance agencies and sectoral organisations' events. The*

²⁵⁶ The inclusion of a 'process' theme, around efficiency in quality assurance processes, avoiding duplications, digitalising processes and making the best use of available data should also be considered.

European Commission could also consider providing additional incentives to use the European Approach in relevant funding calls, to stimulate its further use.

8.1.4 Thematic focus of quality assurance

Quality assurance can cover different themes. The ESG focuses on quality assurance related to learning and teaching in higher education. Its 2015 update expanded the focus of the previous ESG to incorporate various new elements in learning and teaching, such as student-centred learning and greater emphasis on learning outcomes. However, increasingly important areas for the future of quality assurance are not covered appropriately in the 2006 Council Recommendation.

Recommendation 4: *It is recommended that quality assurance systems can respond to key societal developments affecting higher education, such as incorporating specific objectives in their regular external quality assurance or through focused or thematic quality reviews at system level. These developments could include topics such as the promotion of fundamental academic values, attractive and sustainable academic careers and working conditions, social inclusion, and the acquisition of green and digital skills.*

Ecosystems of micro-credentials are emerging in Europe, creating new challenges for quality assurance. While some countries apply or aim to apply the same quality assurance processes for micro-credentials as for other types of higher education credentials, most stakeholders interviewed for this study were of the view that this approach would likely be excessive given the nature of those credentials (larger numbers, more dynamic, etc.) and that the focus of external quality assurance should be on the institutional approach to micro-credentials. That is, micro-credentials should explicitly be included in the existing internal quality assurance procedures, and the main responsibility for quality assuring them will thus remain with the providers.

Recommendation 5: *The quality assurance of micro-credentials should be systematically incorporated in the internal quality assurance of institutions and the external quality assurance of micro-credentials should thus remain at the institutional level. Where no institutional external quality assurance exists, micro-credentials could be reviewed in clusters and as part of existing quality assurance procedures for the programme, group or discipline the micro-credential relates to.*

8.1.5 The shift towards an institutional approach to external quality assurance

The 2022 Council Recommendation on building bridges for effective European higher education called for Member States to “move further towards the use of institutional-based external quality assurance”. A 2023 survey²⁵⁷ showed that 10 Member States already use institutional-based external quality assurance, while 4 are in the process of moving to an institutional approach. This situation hampers European cooperation, in particular the development to joint programmes, such as a European degree.

Recommendation 6: *Member States should allow the transition towards institutional-based external quality assurance. This can be achieved by taking steps to support higher education institutions, such as through peer learning and capacity-building, as well as adapting legislation where necessary. These initiatives help to develop robust internal quality assurance systems*

²⁵⁷ Carried out for the European Education Area Strategic Framework Higher Education Working Group in June 2023

and foster a strong quality culture, both of which are prerequisites for granting self-accreditation of programmes.

8.1.6 The link between quality assurance and recognition

Substantial barriers to automatic recognition remain. Few systems have fully implemented automatic mutual recognition, whereas many countries are in a state of limited implementation or no implementation at all. Moreover, links between quality assurance and automatic recognition are often lacking in Member States. At present, recognition is insufficiently embedded in quality assurance processes, and national regulations do not always fully take into account quality assurance in line with the existing European frameworks as a basis to make recognition automatic.

Recommendation 7: *Actions to better integrate quality assurance and recognition to facilitate mobility should be implemented. This could entail embedding recognition more strongly as part of quality assurance processes, as well as using quality assurance outcomes to guarantee automatic recognition.*

Significant progress has been achieved with regards to the use of most transparency tools. However, some tools still require further efforts. Explicit references to the inclusion of all European Credit Transfer and Accumulation System (ECTS) elements in quality assurance remain limited to a minority of higher education systems in the EU.

Recommendation 8: *Further encouragement is needed for quality assurance agencies and higher education institutions to include all key ECTS elements in their quality assurance evaluations.*

Moreover, the ESG, the European Approach, EQAR and DEQAR could play an even stronger role in linking quality assurance and automatic recognition.

Recommendation 9: *Member States, QA agencies and higher education institutions should take further action to ensure the implementation and a more robust use of transparency tools, in particular the ESG, the European Approach and EQAR. This could include providing further guidance or further regulatory or financial incentives (for example, in the context of programme and module approval or renewal processes, or through EU project funding) to ensure implementation of these tools. They should also consider how to further develop existing transparency tools. DEQAR, for example, could serve as a central digital register that students and employers can access to obtain information on the quality of higher education institutions and the study programmes that they may wish to pursue, and for which the qualifications will be automatically recognised.*

Recommendation 10: *Encourage and support the evaluation of the implementation of automatic recognition in the internal and external quality assurance processes of higher education institutions.*

8.1.7 Recommendations to develop a European Quality Assurance and Recognition System

The analysis of the implementation of the 2006 Council Recommendations as well as of transparency tools provides a basis for considering the next steps for European quality assurance and recognition, which provides development paths for countries with a programme-based approach, those with an institutional-based approach and for deeper forms of cooperation such as those created by European Universities alliances.

For countries with a programme-based or combined approach:

Recommendation 11: *Member States should allow, encourage and facilitate the implementation of the European Approach, including by not making it financially disadvantageous to do so.*

Institutional-based quality assurance systems combined with self-accreditation provide more flexibility for the award of joint degrees and other forms of transnational cooperation, as it removes the requirement for formal external accreditation of each individual programme.

Recommendation 12: *Member States should limit compulsory programme accreditation to an initial accreditation of new programmes. Over time, higher education institutions should be allowed to further demonstrate the full functioning of their internal quality assurance arrangements through an institutional accreditation/audit and become exempt from programme accreditation, following the goal formulated by the 2022 Council recommendation.*

Given the complementarities between the European Approach standards and proposed European criteria for a European Degree, stakeholders stressed the need to avoid duplication and the possible advantages of combining the assessment of European criteria for a European degree (label) with an (external or self) accreditation process against the European Approach standards, i.e. checking the compliance with the European criteria for a European degree (label) would be an optional add-on component in a regular European Approach process.

Recommendation 13: *Further stakeholder consultation is required at EU level to build on complementarities and synergies between existing quality assurance processes and the European degree (label) and to avoid duplications and to develop guidance for its concrete application.*

Quality assurance of European Universities and other transnational alliances:

Most stakeholders noted, during the course of this study, that quality assurance can entail significant administrative, and financial, costs, which are particularly significant for the development of joint educational programmes and transnational activities by alliances, including the European Universities alliances.

Recommendation 14: *European Universities and other transnational alliances could choose to undergo a joint external quality assurance of their joint educational provision, with no requirement to have the same provision assessed again under regular external quality assurance procedures during the same period.*

Different interpretations of the recommendations related to quality assurance and recognition coexist, even among highly specialised experts, leading to differences in how progress and implementation are being measured, and different results. There is also a certain degree of duplication in data collection efforts. There is a need to further clarify how to monitor progress at the country and institutional levels.

Recommendation 15: *There is a need for further work on EU level with stakeholders and institution to provide greater clarity on the definition of levels of alignment with a future Quality assurance and recognition system and how they should be measured. Duplication of efforts in data collection should be avoided.*

8.2 Implementing the recommendations

The recommendations from section 8.1 are presented in the table on the following page. The table illustrates how these recommendations address the needs and challenges identified in this report, the primary areas of policy action they target, the stakeholders responsible for their implementation, and the anticipated timeline for their execution.

In general, a short-term (ST) projected timeline is assigned to the actions which call for the revision or modification of an existing recommendation. A medium-term (MT) timeline is assigned to the recommendations which relate to policies which are currently being implemented. A longer-term timeline (LT) is assigned to the recommendations for which policies are yet to be designed before being implemented and/or which may face challenges in implementation, as highlighted earlier in this report.

Table 5. Summary of recommendations

Need	Main area of policy action	Recommendation	Lead stakeholder
<p>Remove complexities and barriers for transnational cooperation in quality assurance</p>	<p>Encouraging further action</p>	<p>Recommendation 3: Given the strong support for the European Approach encountered during this study, measures should be taken to overcome the barriers to its implementation. Member States should systematically embed the European Approach in national legislation as a first step, but also make sure that substantive quality assurance requirements at the national level (e.g. in terms of staffing, assessment and other areas) can be flexible enough not to hamper international cooperation. This should be complemented with more effective dissemination on what the approach means, and its benefits. It is important to continue sharing good practices through networking in quality assurance agencies and sectoral organisations' events. The European Commission could also consider providing additional incentives to use the European Approach in relevant funding calls, to stimulate its further use.</p>	<p>Member States</p>
		<p>Recommendation 6: Member States should allow the transition towards institutional-based external quality assurance. This can be achieved by taking steps to support higher education institutions, such as through peer learning and capacity-building, as well as adapting legislation where necessary. These initiatives help to develop robust internal quality assurance systems and foster a strong quality culture, both of which are prerequisites for granting self-accreditation of programmes.</p>	<p>Member States</p>
		<p>Recommendation 11: Member States should allow, encourage and facilitate the implementation of the European Approach, including by not making it financially disadvantageous to do so.</p>	<p>Member States</p>
		<p>Recommendation 12: Member States should limit compulsory programme accreditation to an initial accreditation of new programmes. Over time, higher education institutions should be allowed to further demonstrate the full functioning of their internal quality assurance arrangements through an institutional accreditation/audit and become exempt from programme accreditation, following the goal formulated by the 2022 Council recommendation.</p>	

Need	Main area of policy action	Recommendation	Lead stakeholder
	Revising the Council recommendation	Recommendation 2: There is a need to update or replace recommendations which are no longer relevant, because they have been completely achieved, or because only a small set of countries remains to achieve them, and should include new areas of key importance for the future of European higher education ²⁵⁸ .	EU/Member States
	Reform implementation support	<p>Recommendation 1: Target additional support to EU Member States that would benefit from it to speed up implementation. This support could include mutual learning activities, particularly on the recommendations for which a large degree of variation in terms of implementation remains.</p> <p>Recommendation 14: European Universities and other transnational alliances could choose to undergo a joint external quality assurance of their joint educational provision, with no requirement to have the same provision assessed again under regular external quality assurance procedures during the same period.</p> <p>Recommendation 13: Further stakeholder consultation is required at EU level to build on complementarities and synergies between existing quality assurance processes and the European degree (label), to avoid duplications and to develop guidance for its concrete application.</p>	EU Member States EU
Support automatic mutual recognition	Encouraging a common quality framework for automatic mutual recognition	Recommendation 7: Actions to better integrate quality assurance and recognition to facilitate mobility should be implemented. This could entail embedding recognition more strongly as part of quality assurance processes, as well as using quality assurance outcomes to guarantee automatic recognition.	All

²⁵⁸ The inclusion of a 'process' theme, around efficiency in quality assurance processes, avoiding duplications, digitalising processes and making the best use of available data should also be considered.

Need	Main area of policy action	Recommendation	Lead stakeholder
	<p>Refining Bologna tools & the quality assurance approach to micro-credentials</p>	<p>Recommendation 4: It is recommended that quality assurance systems can respond to key societal developments affecting higher education, such as incorporating specific objectives in their regular external quality assurance or through focused or thematic quality reviews at system level. These developments could include topics such as the promotion of fundamental academic values, attractive and sustainable academic careers and working conditions, social inclusion, and the acquisition of green and digital skills.</p> <p>Recommendation 5: The quality assurance of micro-credentials should be systematically incorporated in the internal quality assurance of institutions and the external quality assurance of micro-credentials should thus remain at the institutional level. Where no institutional external quality assurance exists, micro-credentials could be reviewed in clusters and as part of existing quality assurance procedures for the programme, group or discipline the micro-credential relates to.</p> <p>Recommendation 8: Further encouragement is needed for quality assurance agencies and higher education institutions to include all key ECTS elements in their quality assurance evaluations.</p> <p>Recommendation 9: Member States, QA agencies and higher education institutions should take further action to ensure the implementation and a more robust use of transparency tools, in particular the ESG, the European Approach and EQAR. This could include providing further guidance or further regulatory or financial incentives (for example, in the context of programme and module approval or renewal processes, or through EU project funding) to ensure implementation of these tools. They should also consider how to further develop existing transparency tools. DEQAR, for example, could serve as a central digital register that students and employers can access to obtain information on the quality of higher education institutions and the study programmes that they may wish to pursue, and for which the qualifications will be automatically recognised.</p>	<p>QA Agencies</p> <p>Higher education institutions</p> <p>All</p> <p>All</p> <p>All</p> <p>All</p>

Need	Main area of policy action	Recommendation	Lead stakeholder
		<p>Recommendation 10: Encourage and support the evaluation of the implementation of automatic recognition in the internal and external quality assurance processes of higher education institutions.</p> <p>Recommendation 15: There is a need for further work on EU level with stakeholders and institution to provide greater clarity on the definition of levels of alignment with a future Quality assurance and recognition system and how they should be measured. Duplication of efforts in data collection should be avoided.</p>	

Annexes

Annex 1 List of acronyms

A1.1 European transparency tools

Recommendation Seven Article 7 of the 2022 Council Recommendation on building bridges for effective European higher education cooperation

2006 CR / 2006 Council Recommendation on European cooperation in quality assurance in higher education

DEQAR Database of External Quality Assurance Results

ECHE European Charter for Higher Education

ECTS European Credit Transfer System

EDC European Digital Credentials for Learning

EQAR European Quality Assurance Register

EQF European Qualifications Framework

EQAF European Quality Assurance Forum

ESG European Standards and Guidelines for Quality Assurance in the European Higher Education Area

European Approach European Approach for the Quality Assurance of Joint Programmes

EHEA European Higher Education Area

HE Higher education

IEP Institutional Evaluation Programme

NZQA New Zealand Qualifications Authority

IQAS Internal Quality Assessment Scheme

QF-EHEA Qualifications Framework of the European Higher Education Area

YUFE Alliance Young Universities for the Future of Europe

A1.2 National quality assurance and accreditation agencies

AEQES: French speaking part of Belgium Agency for Quality Assurance in Higher Education

AIKA: Latvian National Quality Assurance Agency

AQ Austria: Agency for Quality Assurance and Accreditation Austria

ANECA: Spanish National Agency for Quality Assessment and Accreditation of

ARACIS: Romanian Agency for Quality Assurance in Higher Education

ASHE: Croatian Agency for Science and Higher Education

CTI: French Commission for Engineering Titles

CYQAA: Cypriot Agency of Quality Assurance and Accreditation in Higher Education

FINEEC: Finnish Education Evaluation Centre

GAC: German Accreditation Council

HAC: Hungarian Accreditation Committee

HAKA: Estonian Quality Agency for Education

Hcéres: French High Council for the Evaluation of Research and Higher Education

HQA: Hellenic Quality Assurance and Accreditation Agency

MFHEA: Malta Further and Higher Education Authority

NAB: Lithuanian National Accreditation Bureau for Higher Education

NEAA: Bulgarian National Evaluation and Accreditation Agency

NVAO: Accreditation Organisation of the Netherlands and Flanders

PAC: Polish Accreditation Committee

QQI: Quality and Qualifications Ireland

SAAHE: Slovak Accreditation Agency for Higher Education

SKVC: Lithuanian Centre for Quality Assessment in Higher Education

SQAA: Slovenian Quality Assurance Agency

UKÄ: Swedish Higher Education Authority

A1.3 European organisations

ENQA: European Association for Quality Assurance in Higher Education

EURASHE: European Accreditation of Institutions in Higher Education

EUA: European University Association

ESU: European Students' Union

A1.4 Other

AI: Artificial Intelligence

EU: European Union

Annex 2 List of country researchers

Country	Researcher	Email
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Annex 3 List of participants in the feasibility workshop held on 07 November 2023

Participant	Organisation/role
Aleksandar Šušnjar	Centre for Quality Assurance, University of Rijeka, Expert Associate
Alexandru-Mihai Carțiș	University of Bucharest
Anna Gover	ENQA
Cécile McGrath	ICF
Chiara Finocchietti	CIMEA (ENIC-NARIC), President of the ENIC Network
Chirazi Gianina	National Center for the Recognition and Equivalence of Diplomas Romania
Eleni Spiliopoulou	CIVIS
Emmanuelle Gardan	Coimbra group
Florian Thery	CYU/EUTOPIA,
Guibert Tanguy	European Students' Union (ESU)
Hennessy, James	ICF
Hens Liesbeth	Flemish Ministry of Education and Training
Ivana Didak	The Guild
Jakub Grodecki	EURASHE, Policy and Project Manager
Juan Rayon Gonzalez	DG EAC
Julie Anderson	DG EAC
Kinga Szuly	DG EAC
Kurt Willems	UNA EUROPA / ED-AFFICHE EU degree coordinator
Luciana Radut-Gaghi	CY Cergy Paris Université
Macho Evelin Melinda	Head of Unit, Federal Ministry of Education, Science and Research Austria
Magalie Soenen	EQAR
Manuel Souto-Otero	ICF
Maria del Carmen de Castro Rodriguez	Universidad Autónoma de Madrid
Maria Kelo	EUA
Mark Frederiks	NVAO Policy Advisor
Merixell Chaves	CHARM-EU Alliance Manager
Nadia Pinedo	SMARTT, EU degree Coordinator

Paulo Ferreira	Universidade Lusófona
Pecenka Florian	Head of Unit Department for Education, Science and Research at Permanent Representation of Austria to the EU
Richardson, Michael	ICF
Rita Dias	President ESN
Solange Pisarz	CTI
Valentina Musso	ICF
Vanessa Debiais-Sainton	DG EAC
Victoria Margarita de Lezcano-Mújica Núñez	Ministry of Universities Spain
Yann-Mael Bideau	DG EAC

Annex 4 List of stakeholders interviewed

Member State	Ministry	National HE agency/body	Quality or accreditation agency	HEI/sector representative/experts
Austria	Austrian Federal Ministry of Education, Science and Research		AQ	UNIKO ÖH students' union EURASHE president
Belgium	Vlaams Ministerie van Onderwijs en Vorming		NVAO AEQES	Technological higher education association representative
Bulgaria	Ministry of Education and Science		National Evaluation and Accreditation Agency (NEAA)	2 professors from University of National and World Economy - Sofia
Croatia	Ministry of Science and Education Agency for Science and Higher Education (ASHE)		Agency for Science and Higher Education (ASHE)	
Czechia	Ministry of Education,		Deputy Chairman,	Vice-Rector for Education Strategy and

Member State	Ministry	National HE agency/body	Quality or accreditation agency	HEI/sector representative/experts
	Youth and Sport		National Accreditation Bureau	Quality, Charles University
Cyprus	Department of Higher Education of the Cyprus Ministry of Education, Sport and Youth (MoESY)		President of the Cyprus Agency of Quality Assurance and Accreditation in Higher Education (CYQAA)	
Denmark	Ministry of higher Education and Research		The Danish Accreditation institution	Danmarks Tekniske Universitet
Estonia		Estonian ENIC/NARIC	Estonian Quality Agency for Education	Tartu Health Care Collage
Finland	Ministry of Education and Culture	Finnish National Agency of Education	FINEEC/KARVI	
France	Ministère de la Fédération Wallonie-Bruxelles		Cti Hcéres	Representative of École de référence internationale de la construction
Germany		Nationale Agentur für Erasmus+ Hochschulzusammenarbeit	German Accreditation Council AQAS	FZS (students' union) GEW (teachers' union) German Rectors' Conference ETUCE Vice-President
Greece	Ministry of education			Panteion University - Department of Social Policy University of Patras - Department of Educational Studies and Social Work

Member State	Ministry	National HE agency/body	Quality or accreditation agency	HEI/sector representative/experts
Hungary	Ministry of Culture and Innovation		Hungarian Accreditation Committee	Hungarian Rectors' Conference
Italy			ANVUR	UDU (students' union)
Ireland	Department of Further and Higher Education, Research Innovation and Science	National Forum for the Enhancement of Teaching and Learning, Higher Education Authority		Technological and Higher Education Association (THEA) IUA
Latvia	Department of Higher Education and research, Ministry of Education and Science		The State Education Quality Service (SEQS) Head of the Quality Agency for Higher Education (AIKA)	2 Associate Professors at Riga Technical University, Faculty of Business, Management and Economics
Lithuania				Representative of Lithuanian Universities Rector's Council, vice-rector for studies at Romeris University
Luxembourg	2 representatives from the Ministère de l'Enseignement supérieur et de la Recherche			
Malta	Ministry for Education		QQA	
Netherlands			NVAO	NHL Stenden University of Applied Sciences ISO (students' union)
Poland	Ministry of Education and Science, Innovation and		Polska Komisja Akredytacyjna (PKA)	

Member State	Ministry	National HE agency/body	Quality or accreditation agency	HEI/sector representative/experts
	Development Department			
Portugal			National evaluation agency A3ES	
Romania		Director of the Romanian ENIC-NARIC centre	Romanian Agency for Quality Assurance in Higher Education (ARACIS)	President of the European Students' Union (ESU),
Slovakia	Ministry of Education, Science, Research and Sport of the Slovak Republic		Slovak Accreditation Agency for Higher Education	Slovak University of Agriculture in Nitra
Slovenia	Ministry of Higher Education, Science and Innovation		SQAA – Slovenian Quality Assurance Agency	
Spain		NARIC	ANECA	Madri+d
Sweden			Swedish Higher Education Authority (UKA)	The Association of Swedish Higher Education Institutions
Total interviews per stakeholder type	20	6	27	29

Annex 5 Overview of purpose of quality assurance by type of quality assurance

	Formative		Summative			
	Advice/enhancement ²⁵⁹	Inform the public	Use of the university or HEI title/Degree awarding powers	Right to offer a study programme/Granting self-accrediting rights on programmes to HEIs ²⁶⁰	[Explicit mention to] access public funding	Accreditation ²⁶¹
Internal quality assurance						
Of programmes	AT , BE FL , BE FR , BG, CZ, DE, EL, FR, HR, HU, IE, IT, LV, NL, PL, PT, SE, SI	BE FL, BE FR, DE, HR, IT, SI				
Of institutions	AT , BE FR , CY , CZ, DK , EL , ES , FR , HR , HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI	BE FR, CY, FI, HR, HU, SI				
External quality assurance						

²⁵⁹ Systems in bold are those for which the country researcher has reported a quality enhancement purpose for the quality assurance system. Systems which are not in bold are the ones for which the research team has inferred that there could be a quality enhancement purpose of the quality assurance evaluation.

²⁶⁰ Self-accrediting rights tend to be awarded to higher education institutions following a positive external quality assurance result. The agency conducting the external quality assurance reviews the internal quality assurance process of the higher education institutions before providing self-accrediting rights. One could therefore argue that a purpose of internal quality assurance is also for higher education institutions to acquire self-accrediting rights.

²⁶¹ Systems in red are those which go through a reaccreditation process.

	Formative		Summative			
	Advice/enhancement ²⁵⁹	Inform the public	Use of the university or HEI title/Degree awarding powers	Right to offer a study programme/Granting self-accrediting rights on programmes to HEIs ²⁶⁰	[Explicit mention to] access public funding	Accreditation ²⁶¹
of programmes	AT ⁰ , BE FL, CY, CZ, DE, DK, EE, EL, ES ⁰ , FI, FR, HU, IE, IT, LT, LU, LV, MT, NL, PT, RO, SE, SI	AT ⁰ , BE ⁰ , FR, CY, EL, FL, HU, LT, RO	-	AT ⁰ , BE FL, BG, CY, CZ, DE, EE, FR, HR, IE IT, LV, NL, PL, PT, RO, SE, SI, SK	BE FL, DE	AT, BE FL, BG, CY, CZ, DE ⁰ , DK (conditional), EE, EL, ES ⁰ , FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SI, SK
of institutions	AT ⁰ , BE FL, DK, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV MT, NL, PL, PT, RO, SI	AT ⁰ , CY, DK, FI, HU, IT, LT, PL, PT, RO, SI	BG, CY, CZ, DK, EE, ES, HR, IT, LT, LV, NL, SI, SK	AT, BG, CZ, DE ⁰ , DK, EE, FI, IE, LV, NL, (exp. 2024), SK	AT ⁰ , BE FL, DE, EL, FR, SE	AT, BG, CY, CZ, DE, DK, EE, EL, ES ⁰ , FI, HR, IT, LT, LU, LV, MT, NL, PL, RO, SE, SI, SK

Annex 6 Template for the national desk research

Country:	
Researcher:	
Information to retrieve from desk research	
1. Quality Assurance in context	
1.1 General overview	
<p>The aim of this section is to explore the wide variety of QA systems in the EU with a focus on international cooperation in particular:</p> <p>Please clarify the main steps in the national QA system and who are the main actors involved in it.</p> <p>Please note that we are interested in: the quality assurance and accreditation procedures of degree programmes, micro-credentials, and institutions.</p> <p>External quality assurance processes (for evaluation and/or accreditation, reaccreditation) and their links with internal quality assurance processes of institutions (how much there is a quality culture developed at institutions).</p> <p>Please specify whether, in your view, the quality assurance system in your country is: programme-based²⁶², institutional²⁶³ or a mix of both.</p>	
1.2 Main changes	
<p>✓ Summarise any main legislation, regulation, policy document, strategy or guideline adopted by the relevant authority, quality assurance agency or grouping of education institution on quality assurance since 2006. For each change, provide a reference, previous and new situation, rationale/ reason for the change, nature of the change (voluntary or compulsory implementation), who needs to implement it and any evidence on the effects of the change.</p>	
2. Description of the situation regarding the points of relevance to the 2006 Council Recommendation	
2.1 Situation regarding national quality assurance practices of relevance to the 2006 Council Recommendation	
<p>✓ Drawing upon relevant documents at the national, regional, local, or institutional level, please describe how and to which extent relevant authorities in your country:</p>	
<ul style="list-style-type: none"> ○ Have introduced and developed rigorous internal QA systems in accordance with the ESGs 	
<ul style="list-style-type: none"> ○ Ensure the independence of QA and accreditation agencies, following the 1998 Recommendation on European Cooperation in QA in HE and applying and further developing ESGs to promote innovation 	

²⁶² Programme-based quality, which consist in evaluating or accrediting the quality of programmes offered by higher education institutions, allowing for comparisons between subjects, outcome orientations, better information of programmes the recognition of joint degrees. Amourgis et al. (2009) 'Programme-oriented and institutional-oriented approaches to quality assurance: new developments and mixed approaches', URL: [ENQA-workshop-report-9.pdf](#)

²⁶³ Institutional-based approaches to quality assurance consider the institution as a whole, including most or sometimes even all of its operations, from educational and research activities to administrative, legal and funding aspects. The institutional approach is carried out either as quality audit, accreditation or evaluation. From Amourgis et al. (2009)

<ul style="list-style-type: none"> ○ Use the European Register QA Agencies, define the conditions for registration and rules for management 	
<ul style="list-style-type: none"> ○ Allow HEIs in Member States to choose among QA or accreditation agencies in the European Register, provided that this is compatible with national legislation 	
<ul style="list-style-type: none"> ○ Allow HEIs to work towards complementary assessment by another agency in the European Register 	
<ul style="list-style-type: none"> ○ Promote cooperation between agencies, to facilitate the recognition of QA and accreditation assessments to contribute to the recognition of qualifications for the purpose of study in another Member State 	
<ul style="list-style-type: none"> ○ Ensure public access to assessments made by the agencies listed in the European Register 	

2.2 Regulation applicable specifically to joint educational programmes and other forms of joint educational offers developed by institutional transnational cooperation

Please explain how external quality assurance and the accreditation of joint educational programmes and other forms of joint educational offers developed by institutional transnational cooperation work in your country.

State and explain the regulatory document(s) which describes how joint educational programmes are externally quality assured and accredited.

If you could not retrieve any relevant official document or guideline, please specify below.

Please specify whether these regulations regarding external quality assurance and accreditation of joint educational programmes and other forms of joint offers developed by institutional transnational cooperation follow the European Standard and Guidelines (ESG).

Please specify whether these regulations regarding the external quality assurance and/or accreditation of joint educational programmes and other forms of joint offers developed by institutional transnational cooperation follow or allow for the use of the European Approach .

Please describe the measures taken to support the full implementation of the European Approach?

Summarise any relevant policy document or guideline regarding the quality assurance and recognition process for joint programmes/programmes *developed by specifically by European Universities alliances*, if they differ from the above.

Description of the situation regarding the elements of relevance to Recommendation Seven of the 2022 Council Recommendation on Building bridges for effective European higher education cooperation

Following from question 1.1, please describe, if any, the actions taken by relevant authorities to **support the move toward institution-based quality assurance**. Please explain the drivers and barriers regarding this move toward institution-based quality assurance.

Please explain if, and under which condition, a self-accreditation of programmes is possible in your country.

Please specify if the self-accreditation of programmes is linked to institutional quality assurance.

If programme-based external quality assurance is available in your country, please explain²⁶⁴:

If the external evaluation of joint transnational programmes can be carried out by one single agency registered in the European Quality Assurance Register for Higher Education (EQAR)

If the outcomes of this external evaluation are automatically accepted in all other higher education systems concerned, without adding further national requirements. If further national requirements exist or if there is no automatic acceptance of the external evaluation carried out by a single agency registered in EQAR, please explain describe the additional requirements and/or barriers to automatic acceptance.

How the reaccreditation of joint transnational programmes works in your country. We are particularly interested in understanding if the reaccreditation of joint transnational programmes follows the rules of the ESG and if it follows follow the European Approach .

3. Description of the situation regarding the development of transparent and coherent recognition processes and their links to Quality Assurance

✓ Summarise **the quality assurance policy on the procedures linked to the recognition of qualifications obtained in another EU Member State** from the Quality Assurance Agency in your country (Please specify if this policy cannot be found, or is not public).

Qualifications obtained in another EU Member State include higher education qualifications and secondary qualifications that give access to higher education.

Please note, in the quality assurance policy on procedures linked to the recognition of qualifications, we are particularly interested in:

Evidence of the inclusion of recognition processes (covering qualifications, certificates, prior learning, partial studies, learning periods abroad) in (external) quality assurance guidelines;

Whether internal recognition procedures (for qualifications, Recognition of Prior Learning, ECTS, learning periods abroad) of HEIs are covered by QA processes;

The impact of external quality assurance on accreditation/reaccreditation/recognition; The use of ECTS and whether it is covered by QA processes;

The use of modules and micro-credentials²⁶⁵ provided by institutions based in other Member States by a home institution (and the processes available to quality assure these modules or micro credentials);

The external quality assurance of transnational programmes.

4. Findings regarding the use of Bologna process tools relevant to quality assurance and recognition

Please summarise the extent to which the following **transparency tools** are used in your country in your view. If you have the data, you may want to indicate the percentage of HEIs using these transparency tools, and refer to the benefits and challenges linked to using these tools.

European Credit Transfer System (ECTS) – European Qualifications Framework (EQF) – Qualifications Framework for the European Higher Education Area (QF-EHEA) -	
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²⁶⁴ The 2022 Council Recommendation also recommends that Member States fully implement the European Approach for the Implementation of Joint Programmes; as well as design measures to support the full implementation of the European Approach for the implementation of joint programmes. A description of the situation regarding both of these aspects is included in section 2.2 points 3 and 5 and therefore not repeated in this section.

²⁶⁵ "A micro credential is a proof of learning outcome that a learner has acquired following a short learning experience. These learning outcomes have been assessed against transparent standards". For more information, see: European Commission, Directorate-General for Education, Youth, Sport and Culture, Shapiro Futures, H., Andersen, T., Nedergaard Larsen, K., *A European approach to micro-credentials : output of the micro-credentials higher education consultation group : final report*, Publications Office of the European Union, 2021, p. 10, <https://data.europa.eu/doi/10.2766/30863>

please summarise the findings from WP1 for these tools	
The European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)	
The European Approach for Quality Assurance of Joint Programmes	
The European Quality Assurance Register for Higher Education (EQAR)	
Summarise any national level, regulatory, other 'official' document or guideline by the Quality Assurance agency regarding the implementation of transparency tools for recognition (e.g., ECTS, EQF, QF-EHEA), the ESG, the European Approach , or EQAR	
5. Findings regarding the conclusions and recommendation	
✓ Summarise any document which provides a policy opinion/perspective which highlights the strengths and issues with QA systems and practices in your country and documents which propose changes to quality assurance and recognition in your country -with a particular focus on joint programmes, when applicable.	
6. Relevant publication and contacts	
✓ Include any relevant contacts (name, position, email) that you think would be useful to approach for the consultations	

Questions for national interviews for all informants

Facts to check or gather further data on

Individual country researchers to clarify areas where information gaps have been identified in the desk research for their country with informants –see Annex 1.

Opinion on quality assurance at the national level: challenges, advantages and needs

What are the main objectives of your country's quality assurance system? Would you have other suggestions regarding what you think the main objectives should be?

What do you think works well in quality assurance in your country...?

...And more specifically on the quality assurance linked to transnational cooperation of higher education institutions (for example, joint programmes of alliances)?

What in your view, works less well?

What are the most relevant challenges to the quality assurance linked to transnational cooperation of higher education institutions in your country?

What are the most relevant challenges to transparency in quality assurance, for example including the extent to which QA reports are easily accessible, understandable and useful for the public?

Do you think that the burden your country's quality assurance arrangements put on HEIs is appropriate in light of the objectives/what is at stake?

How have recent developments affected quality assurance since 2006? [Prompt: European Universities alliances, micro-credentials, sustainable development, trend toward more quantitative data analysis, maybe trend toward more institution-based quality assurance?]

What are the three most important developments that you would you want to see/achieve in the quality assurance system of your country in light of increasing international collaboration activities?

Vision for a European quality assurance and recognition system

When you think about the future of European higher education, what main goals and objectives, would an ideal European system of quality assurance and recognition have/be based on?

In your view, how should such a system look like? What would be its main building blocks (that currently exist or that would need to be created) and what actions would be necessary to implement them?

What in your view, could be the role of the European Standards and Guidelines (ESG) in a broader European Quality Assurance and Recognition framework?

What sort of support would be needed for such a system and how long do you think will be required to implement it?

In your view, what could the EU do to best meet the needs that you have? Which further initiatives or actions would be best addressed at the level of the EU to strengthen the quality assurance and recognition processes of transnational cooperation?

Do you think QA processes and outcomes in Europe are currently transparent enough so as to promote trust and international collaboration between HEIs? Why/ why not?

Do you have the same trust in the quality of higher education from other EU Member States if they have a national QA system aligned with the ESG? If you have less trust, why – i.e. in what respects do you find the ESG and their monitoring at European level (through EQAR) insufficient for equal trust?

What further European initiatives are required to strengthen mutual trust through external QA and accreditation of joint programmes or other joint educational offers –including from European Universities- in line with the ESG? and to support trust in relation to other international activities, including student exchanges and mobility?

In your opinion, to which extent does internal QA facilitate degree recognition? And automatic recognition?

In your opinion, to which extent does external QA facilitate degree recognition? And automatic recognition?

How well does the current European QA framework facilitate degree recognition? And automatic recognition?

If not that well, what is the issue, and what would you change to improve it?

How could QA facilitate the automatic recognition of a potential joint European degree²⁶⁶?

Other

What, if any, are the European or international practices that you find interesting and innovative in the area of quality assurance and recognition? Who would you recommend we talk to about these practices

²⁶⁶ A recent feasibility study listed two options for a European degree. Option 1 included a joint European degree label, which would be selectively awarded to joint study programmes that lead to the award of a joint degree and which meet a pre-defined list of criteria at European level. Option 2 saw a European degree as a qualification based on common European criteria. The feasibility study makes some suggestions regarding how option 1 could evolve into option 2 over time.

For more information, see: European Commission, Directorate-General for Education, Youth, Sport and Culture, Burneikaitė, G., Pocius, D., Potapova, E. et al., *The road towards a possible joint European degree – Identifying opportunities and investigating the impact and feasibility of different approaches : final report*, Publications Office of the European Union, 2023, <https://data.europa.eu/doi/10.2766/945147>

Annex 7 Ad hoc request for country researchers

WP2 Request for country experts – follow-up + ad hoc request

14 August 2023

We are writing with a few additional requests related to the country report that you are writing as part of the study on the feasibility of a European Recognition and Quality Assurance System (EAC/11/2021).

As a reminder, could you please confirm that you have crosschecked the information included in your country report with the information available on EQAR and DEQAR?

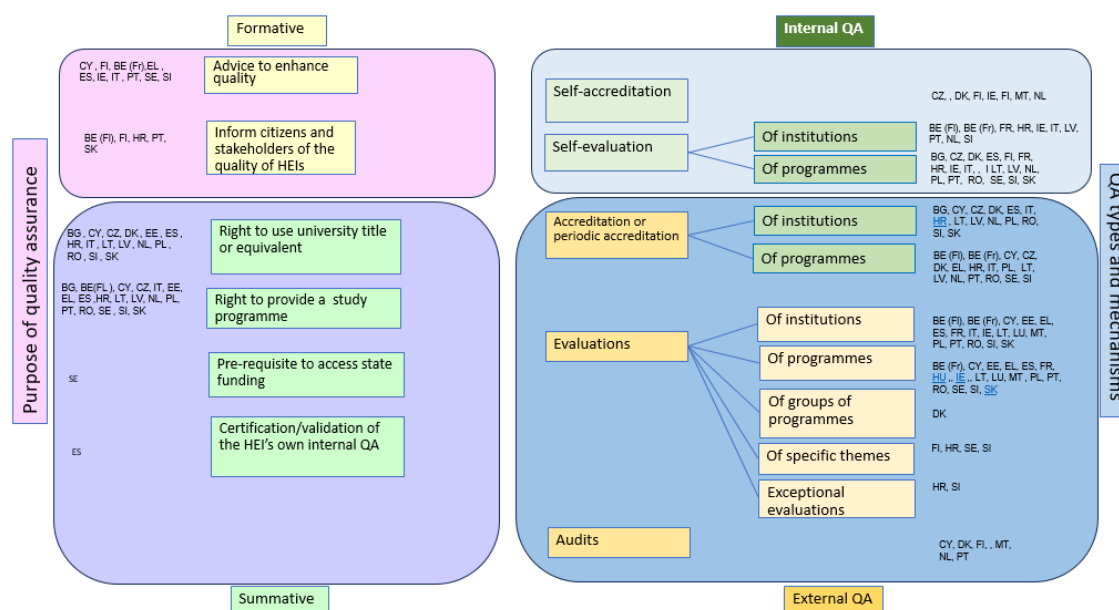
Could you please send your country reports with comments addressed and the interviews completed by the 04th of September. Please ensure that you clearly highlight the gaps, challenges faced, and the actions needed at EU level in your report.

In addition, the client has requested that we clarify the rights related to quality assurance.

To follow-up on this request, we have tentatively mapped the purposes and types and mechanisms linked to quality assurance in each Member State, as summarised in figure 1. We would however need your help to verify the information. Could you please clarify the rights related to quality assurance by completing the information required in tables 1 and 2 below (this has been requested by the client)?

Figure 1: Draft mapping of purposes and types and mechanisms of QA





Could you please clarify the purpose that quality assurance has in your country by verifying that we have included your MS in the appropriate category and/or adding it in the appropriate category²⁶⁷

Table 1: Purposes of quality assurance

Purposes of quality assurance		
Formative	Formative advice to enhance or strengthen quality	CY, FI, BE (Fr), EL, ES, IE, IT, PT, SE, SI,
	Inform citizens and stakeholders of the quality of HEIs	BE (FI), FI, HR, PT, SK
Summative	Right to use the 'university' title (or equivalent higher education institution)	BG, CY, CZ, DK, EE, ES, HR, IT, LT, LV, NL, PL, RO, SI, SK
	Decision providing a specific approval of new study programmes	BG, BE(FL), CY, CZ, IT, EE, EL, ES, HR, LT, LV, NL, PL, PT, RO, SE, SI, SK
	Prerequisite to access funding/financing/state grants;	SE

²⁶⁷ Our research team has not matched a MS to a category if it could not find the information in the submitted country report or if the information requires more clarification.

	Certification/validation of the HEI's own internal QA, i.e., audit	ES
If used, please specify the purpose of the use of the European Approach:		
Used as an addition to national QA approach for joint programmes BE (FI) ²⁶⁸ , FI, BE (Fr), DK, EE, ES, HU, IE, LT, LU ²⁶⁹ , MT, NL, PL, PT, SI ²⁷⁰		
Used as the sole approach for the QA of joint programmes PL, RO		
Formative [please specify]		
Summative i.e. programme accreditation: HR		
Please note if there are any improvements/ changes that could be made to make this approach more attractive and more widely used (this is very important information for the client)		
The European Approach is Not used IT, FR, BG, CY, CZ, SK		
Can you please explain why the approach is not used? (this is very important information for the client)		

Does quality assurance cover the following types and methods in your country? Please verify that your country's name is matched to the correct type of quality assurance and, if not, please note the changes required. Please also include the purpose of each QA type/method, using as suggestions the purposes suggested in table 1.

Table 2 :Types and mechanisms of quality assurance

		Definition ²⁷¹	Country	Please specify the purpose of each type/QA method ²⁷²
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²⁶⁸ The application of EAJP is mandatory for all new co-diplomas. For other cases, such as joint programmes that have institutional accreditation by the NVAO, the use of EAJP is optional.

²⁶⁹ Available to some higher education institutions or only under specific conditions.

²⁷⁰ The European Approach can only be used for programmes where all partner higher education institutions involved are (institutionally or at programme level) accredited by EQAR-registered agencies.

²⁷¹ Definitions adapted from Amourgis, S. et al (2009) 'Programme-oriented and institutional-oriented approaches to quality assurance: new developments and mixed approaches', Helsinki: ENQA, URL: [ENQA-workshop-report-9.pdf](#) and analytic quality glossary, an international analytic glossary of issues related to quality in higher education, URL: [Glossary index \(qualityresearchinternational.com\)](#)

²⁷² The purposes related to quality assurance and that you should use to fill in the column are listed in table 1. These purposes can be formative (to enhance quality or inform citizens), or summative (as a pre-requisite to access funding, to validate internal QA, or to allow the use of the university title or of a study programme).

Internal QA	Self-accreditation	A process or status which allows the HEI to make decisions about the programmes that it offers	CZ, , DK, FI, IE, FI, MT, NL ²⁷³	
	Internal/self-evaluation of programmes	A process through which programmes are evaluated by specific body/expert committee within the HEI	BE (FI), BE (Fr), FR, HR, IE, IT, LV, PT, NL, SI	
	Internal/self-evaluation of institutions	A process through which the activities of the institutions are evaluated by specific body/expert committee within the HEI	BG, CZ, DK, ES, FI, FR, HR, IE, IT, I LT, LV, NL, PL, PT, RO, SE, SI, SK	
External QA	Accreditation or periodic reaccreditation of programmes ²⁷⁴	The establishment or re-establishment of the status, legitimacy or appropriateness of a programme decided by an external quality or accreditation agency/body	BE (FI), BE (Fr), CY, CZ, DK, EL, HR, IT, PL, LT, LV, NL, PT, RO, SE, SI	
	Institutional accreditation or reaccreditation	Accreditation is the establishment of the status, legitimacy or appropriateness of an institution decided by an external quality or accreditation agency/body. Reaccreditation is the follow-up to accreditation once the duration of accreditation has been reached	BG, CY, CZ, DK, ES, IT, HR, LT, LV, NL, PL, RO, SI, SK	
	Evaluations of institutions	A process of assessing whether the institution meets certain quality standards. It can include an external evaluation of the internal quality assurance process by an external quality assurance agency	BE (FI), BE (Fr), CY, EE, EL, ES, FR, IT, IE, LT, LU, MT, PL, PT, RO, SI, SK	
	Evaluations of programmes	Assesses whether a certain programme meets certain standards. In systems where there is a standardised curriculum model, this consists in checking the syllabus against the model curriculum by an	BE (Fr), CY, EE, EL, ES, FR, HU, IE, LT, LU ²⁷⁵ , MT, PL, PT, RO, SE, SI, SK	

²⁷³ In progress, not in place yet (foreseen for 2024).

²⁷⁴ The accreditation of programmes also includes periodic accreditation, as is the case in Italy for example.

²⁷⁵ External quality assurance of foreign private higher education institutions, of their programmes, as well as of the short cycle programmes.

		external quality or assurance agency		
	Evaluation of programme groups/clusters	Assesses whether a group or cluster of programmes meets certain standards	DK	
	Evaluations related to certain themes	Evaluations of a specific topic or discipline across all HEIs in one system, which can be combined in one report	FI, HR, SE, SI	
	Institutional audits	Covers the thorough examination of all operations, from educational and research activities to administrative, legal and funding aspects, conducted by an external agency/body.	CY, DK, FI, , MT, NL ²⁷⁶ , PT	
	Other	Exceptional evaluation ²⁷⁷	HR, SI	

Additional questions: DG EAC also asked to pass on the following additional questions. We would be grateful if you could reply to these questions:

According to the Recommendation Seven of 5 April 2022, the Council Recommendation on building bridges for effective European higher education cooperation of 2022, institution-level accreditation or QA is a better fit for purpose to support recognition than alternatives. Could you please let us know if this view is shared in your country as well, or there is a preference for other approaches to support recognition through QA? (and why).

Would you have further information on how the mergers of certain HEIs has impacted on the QA regime/ how this needs to be organised? What approach is to be followed, in general, with regards to QA if institutions merge?

Do you think that the current QA system is well suited/relevant to university alliances? How can the current QA system be improved to ensure its use by university alliances? To support automatic recognition?

²⁷⁶ In progress, not in place yet (foreseen for 2024).

²⁷⁷ An exceptional evaluation is conducted on one or more activities of a higher education institution.

Annex 8 Criteria for country classification on progress regarding the 2006 Council Recommendation

The Table below summarises our classification criteria regarding the implementation of the 2006 Recommendation. According to the table classification:

A measure is considered to be “fully applied” when there are no exceptions listed in relevant national documents, including for example regulations, legislations or guidelines to the application of the specific recommendation.

The measure is “partially applied” if the application of the recommendation has not been homogenous over the entire national system, if only part of the recommendation is implemented or if its implementation depends on specific circumstances.

The mention “not applied” indicates that the measure is not in place according to the data available, or the measure it is not in place yet, although the Member State may be moving towards its implementation. The mention “no info” means that no information could be found both via desk research and interviews.

Table 6. Classification criteria regarding the state of play of the recommendation of 15 February 2006 on further European Cooperation on quality assurance in European higher education

	Applied	Partially applied	Not applied
Development of rigorous internal quality assurance systems	Internal quality assurance systems are rigorous in accordance with the ESGs	Internal quality assurance systems are only partially compliant with the ESGs	Internal QA systems are not present or not compliant with the ESGs
Independence of quality assurance and accreditation agencies	Agency is reviewed ²⁷⁸ & EQAR decision on standard 3.3 was compliant; Mixed cases considered as ‘applied’ if most agencies are compliant. When a decision is not available, country expert reports and other data suggest full implementation.	Decision on standard 3.3 was one of partial alignment; or when a decision is not available, country expert reports and other data suggest partial implementation.	Decision on standard 3.3 was non-alignment or, when a decision is not available, country expert reports and other data suggest no implementation.
Member States are governmental members – Relevant national agencies are registered in the European Register of quality assurance Agencies	MS is a governmental member and all/most agencies have applied for registration	MS is not a full governmental member or only some agencies have applied for registration	MS is not a governmental member of EQAR and no or only some agencies have applied for registration

²⁷⁸ Number of country research reports which have explicitly referred to a review of the quality assurance agency still to be confirmed

Higher education institutions can choose among quality assurance or accreditation agencies in the European Register provided that this is compatible with their national legislation or permitted by their national authorities	EQAR-registered agencies can be recognised as part of national external quality assurance requirements	National requirements influence the recognition of EQAR-registered agencies	Foreign agencies registered in EQAR are not recognised nationally.
Higher Education Institutions can work toward a complementary assessment by another agency in the European Register	Higher Education Institutions can ask for a complementary assessment by another agency in the European register without conditions	Higher Education Institutions can ask for a complementary assessment by another agency in the European register with conditions; or this criterion is not homogeneously applied nationally	Higher Education Institutions cannot ask for a complementary assessment by another agency in the European register
Promote cooperation between agencies	Cooperation between agencies exists and is supported by clear measures	Cooperation between agencies exists sporadically / is not explicitly supported	No significant levels of cooperation between agencies could be recorded
Allow public access to assessments made by the agencies listed in the European Register	Assessments made by agencies listed in EQAR are publicly available on their websites, as well as on DEQAR ²⁷⁹	Assessments made by agencies listed in EQAR are publicly available, but with some variations nationally and/or assessments are not consistently published on DEQAR	Assessments are not publicly available on DEQAR

◇ denotes the systems where significant sub-national variation may exist. ^Incomplete information: CY, EL, LU, SK, HU

We have covered Belgium Flanders and French Community of Belgium separately and marked with a ◇ the other systems where sub-national variation may exist. In addition, some systems may have regional specificities, as in Spain where regional agencies apply different quality assurance practices. There may also be differences by type of institution (which are also marked with a ◇). For example, in Austria, a system of institutional audits applies to public universities while programme accreditation applies to private universities.

²⁷⁹ Number of country research reports having referred explicitly to publication on DEQAR still to check.

Table 7. Overview of the situation regarding the 2006 Council Recommendation on further cooperation in quality assurance in higher education

Recommendation	Applied	Partially applied	Not applied	I/P
Development of rigorous internal quality assurance systems³⁰	Austria, Belgium Flanders and Belgium French community, Cyprus, Czechia, Germany, Denmark, Estonia, Finland, France, Croatia, Hungary, Ireland, Lithuania, Luxembourg, Latvia, Malta, Poland, Portugal, Romania, Sweden, Slovenia, Slovakia	Spain, Italy, Netherlands	Bulgaria, Greece	
Independence of quality assurance and accreditation agencies	Austria, Belgium Flanders, Belgium French community, Bulgaria, Germany ²⁸⁰ , Denmark, Estonia, Greece, Spain ²⁸¹ , Finland, France, Croatia, Ireland, Lithuania, Luxembourg, Latvia, the Netherlands, Portugal, Romania, Slovenia	Czechia, Cyprus ²⁸⁰ , Hungary ²⁸¹ , Italy ²⁸² , Malta ²⁸³ , Poland, Slovakia, Sweden ²⁸⁴		
Member States are governmental members of EQAR - Relevant national agencies have applied for registration on EQAR	Austria ²⁸⁰ , Belgium Flanders ²⁸⁰ and Belgium French community ²⁸⁰ , Bulgaria, Cyprus; Germany ²⁸⁰ , Denmark, Estonia, Greece, Spain ²⁸¹ , Finland, France, Croatia, Hungary, Ireland, Italy, Lithuania, Luxembourg, Latvia, the Netherlands, Poland, Portugal, Romania, Sweden, Slovenia	Czechia, Malta, Slovakia		
Higher Education Institutions can choose among quality assurance or accreditation agencies in the European Register³⁶	Austria ²⁸⁰ , Belgium Flanders ²⁸⁰ and Belgium French community ²⁸⁰ , Bulgaria, Cyprus, Germany ²⁸⁰ , Finland, Hungary, Lithuania, Luxembourg, Latvia,	Czechia, Denmark, Estonia, France, Greece, Malta, the Netherlands, Portugal	Croatia, Ireland, Italy, Slovenia, Spain ²⁸¹ , Sweden	

280 See decision of 05/11/2019 (<https://data.deqar.eu/agency/60>)

281 See decision of 03/04/2019 (<https://data.deqar.eu/agency/58>)

282 The panel recommends ANVUR to strive for more autonomy in setting the timetable and therefore define the procedures more freely (particularly in AFAM - Higher Education in Art, Music and Dance - accreditations) aiming at improving the quality and meaningfulness of the external quality activities. See https://backend.deqar.eu/reports/EQAR/04_ANVUR_external_review_report.pdf.

283 The ENQA evaluation of the Maltese external agency is ongoing and no previous evaluations were conducted

284 See decision of 18/03/2021 (<https://data.deqar.eu/agency/63>)

	Poland, Romania, Slovakia			
Allow Higher Education Institutions to work toward a complementary assessment by another agency in the European Register³⁷	Austria [◊] , Belgium Flanders [◊] , Belgium French community [◊] , Bulgaria, Cyprus, Czechia, Germany [◊] , Denmark, Estonia, Greece, Spain [◊] , Ireland, Finland, France, Hungary, Croatia, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Romania, Sweden, Slovenia, Slovakia			
Promote cooperation between agencies[^]	Austria [◊] , Belgium Flanders [◊] and Belgium French community [◊] , Czechia, Denmark, Estonia, Finland, France, Croatia, Italy ³⁹ , the Netherlands, Latvia, Malta, Portugal, Romania, Sweden, Slovenia	Bulgaria, Germany [◊] , Spain [◊] , Ireland, Lithuania ⁴⁰	Cyprus, Poland	Greece, Luxembourg, Slovakia, Hungary
Ensure public access to assessments made by the agencies listed in the European Register	Austria [◊] , Belgium Flanders [◊] and Belgium French community [◊] , Cyprus, Bulgaria, Germany [◊] , Denmark, Estonia, Spain [◊] , Finland, France, Croatia, Hungary, Lithuania, Luxembourg, Latvia, Poland, Portugal, Romania, Sweden, Slovenia	Greece, Ireland, the Netherlands	Czechia, Italy, Malta, Slovakia	

Annex 9 Reference list

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