



//// ANNUAL REPORT 2011
including Report by the Register Committee

//// EXTERNAL EVALUATION
of EQAR – Final Report

//// EQAR FOLLOW-UP
of the External Evaluation

MARCH 2012

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ANNUAL REPORT 2011

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/// Foreword and Introduction

Dear readers,

With great pleasure we present you the EQAR Annual Report 2011. For the first time, it includes the regular Report by the Register Committee to the EQAR General Assembly, which before used to be published separately on-line. We believe that this integration will further enhance the transparency and visibility of the Register Committee's work.

By the end of 2011, twenty-eight European quality assurance agencies featured on the Register, operating almost throughout the European Higher Education Area (EHEA). By now, nearly all European quality assurance agencies that underwent an external evaluation against the European Standards and Guidelines for Quality Assurance (ESG) have applied for inclusion on the Register. The first three agencies successfully underwent the periodic, five-yearly review of their activities according to the ESG and had their EQAR registration renewed in 2011.

We were pleased to welcome Croatia, Latvia and Montenegro as new Governmental Members in 2011. Now, 27 of the 47 countries

participating in the Bologna Process have decided to engage actively in the governance of EQAR as Governmental Members and thus to underline their full commitment to the EHEA framework for quality assurance.

The external evaluation of EQAR by an international panel of seven independent experts provided us with ample valuable reflections and recommendations for EQAR's future development. These were discussed in the first EQAR Members' Dialogue, a forum for governmental and stakeholder members as well as EQAR committees to jointly discuss strategies for enhancing EQAR's impact and relevance. The Strategic Priorities and Follow-Up of the External Evaluation of EQAR were then agreed by the General Assembly, to guide us in developing a strategic plan and implementing the evaluation's recommendations in 2012.

We hope that this Report will serve as comprehensive account of EQAR's activities in 2011, and will be valuable to the higher education community as well as the general public.



Andrea Blättler
President, Executive Board



Kjell Frønsdal
Chair, Register Committee

/// Report of the Register Committee

This section of the Annual Report refers to the work of the Register Committee and replaces the previously separate Register Committee reports.

The previous two reports of the Register Committee set out in detail the criteria for inclusion on the Register and the process used to consider applications for inclusion on the Register. For a full description please refer to the Summary Report of the Register Committee (October 2010) and the EQAR Self-Evaluation Report (March 2011), available at:

<http://www.eqar.eu/publications/reports.html>

The Register Committee has continued to use its established process including two main rapporteurs and a third rapporteur, assigned from amongst Committee members, in preparing its decision-making.

In 2011, five new agencies were admitted to the Register and the registration of three agencies was renewed; one agency's registration expired without being renewed due to major restructuring at national level.

The Register featured 28 agencies by the end of 2011, based in 14 European countries and operating almost throughout the European Higher Education Area (EHEA). **Annex 6** includes an overview of agencies registered by the end of 2011.

Applications 2011

	New	Reconsideration after appeal	Renewal	Total
Applications	5	1	3	9
- Accepted	4	1	3	8
- Withdrawn	1	0	0	1
- Rejected	0	0	0	0
Based within / outside EHEA ^a	6 / 0			
ENQA full members ^b	3 / 3			
General / Sectoral ^c	6 / 0			
Operating in one / multiple countries	5 / 1			

a. Based on where applicants have their official seat.

b. Agencies that were full members of ENQA when their application was submitted to EQAR.

c. "Sectoral" refers to agencies that only review institutions or study programmes within one or a few academic disciplines or professional fields.

2.1 First Renewal Applications

Inclusion on the Register is valid for five years as from the date of the external review of the registered quality assurance agency. Three registered agencies had these reviews carried out already in 2006 and thus had to apply for renewal of their inclusion in 2011.

In considering the new external review reports of these agencies the Register Committee often noted visible improvements, including on those matters which were flagged for special attention when these agencies were initially admitted to the Register. However, the external review reports did not in all cases specifically address these flagged issues.

2.2 Information for applicants

A revised Guide for Applicants was published in March 2011, incorporating the new Recommendations for External Reviews of Quality Assurance Agencies (November 2010) and following up on feedback received from applicants in a survey during December 2010/January 2011.

The information on the EQAR website was updated accordingly.

Since the last revisions of the Guide for Applicants were relatively minor, the next update will only be undertaken together with a revision of the Procedures for Applications, which is anticipated to be completed in late 2012.

2.3 Recommendations for External Reviews of Agencies

The Recommendations for External Reviews of Quality Assurance Agencies were drafted and published together with the Register Committee's Summary Report 2008–2010. They have been part of the Guide for Applicants since 2011.

The Register Committee noted that almost all external reviews of quality assurance agencies now adhered to the requirements set out in the Procedures for Applications, and in most instances provided sufficient reliable evidence to enable the Committee to make its judgements.

In one case, however, the applicant withdrew its application for inclusion on the Register after having been notified¹ that the Register Committee considered rejecting the application since the composition of the external panel that reviewed the agency in question did not fulfil the requirements specified in Art. 6 of the Procedures for Applications.

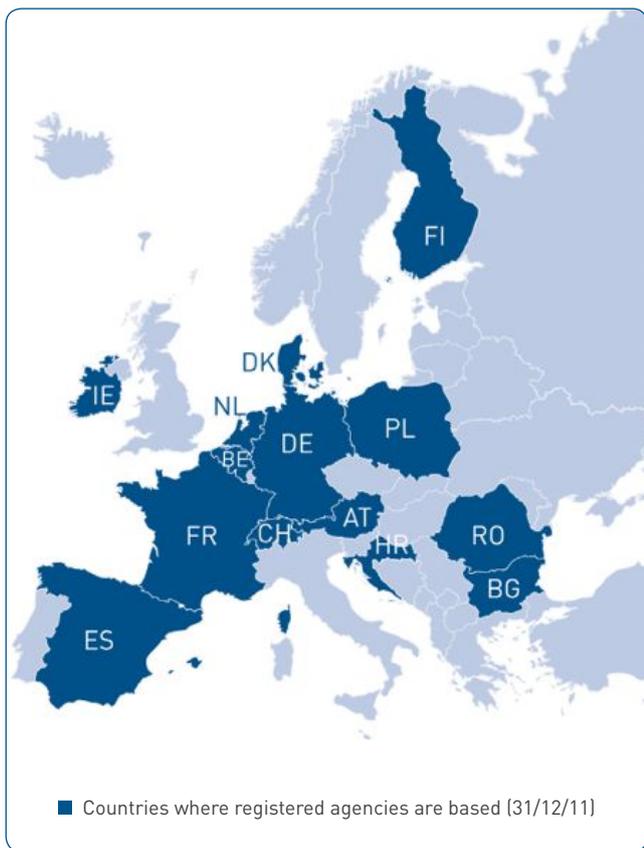
European Standards and Guidelines (ESG)

The ESG were adopted by European ministers of higher education in 2005 as a set of common principles and reference points for internal and external quality assurance of higher education. The ESG comprise three parts addressing:

1. Internal quality assurance
2. External quality assurance (addressing the process)
3. External quality assurance agencies (addressing organisational aspects)

The latter two are directly relevant for inclusion on EQAR. The concept of "substantial compliance" underpins the understanding that the ESG are not a checklist, but a set of agreed principles and reference points for quality assurance. There are different ways in which an agency can adhere to the various principles. The judgement as to whether an agency complies substantially with the ESG is therefore not a mechanical process, but each case is considered holistically.

¹ According to EQAR's official "pre-rejection" procedure [see Art. 10 §2 of the Procedures for Applications] the applicant is first notified of the grounds for possible rejection and invited to make additional representation. At this point the applicant may also withdraw the application.



2.4 Communication with Applicants and the Public

The Register Committee has begun to adopt detailed decisions as separate texts, which are then sent to applicants with a short cover letter. This has replaced the acceptance and rejection letters used previously where the Register Committee's reasoning was included in the body of the letters. This new approach has facilitated the deliberations of the Committee and will also form a good foundation for the publication of Register Committee decisions which is planned for the future.

The Register Committee agreed on a policy of not engaging in

exchanges of letters or other forms of discussions of its decisions, whether at a public or bilateral level. The reasons transmitted to applicants (in the acceptance/rejection decisions) are the Committee's official and final reasons; discussing these further would jeopardise principles of due process. The appeals system was put in place specifically in order to enable applicants to raise concerns about a decision, and is intended to be used by applicants if necessary.

Once agencies are included on the Register they receive an annual reminder about their obligation to report substantive changes to EQAR, i.e. major changes in their organisational structure, activities or methodologies (see Art. 12 §1 of the Procedures for Applications). The introduction of such annual reminder letters seems to have underlined the importance of this obligation and led to an increase in reports received by EQAR giving notice of substantive changes.

2.5 Consistency in Decision Making

The Register Committee has introduced two measures with a view to ensuring and further enhancing consistency in its decision making on applications for inclusion on the Register.

Questions of principle, especially when relating to several pending applications for inclusion, are considered separately from and before the actual application. The Register Committee has introduced a separate, recurring agenda item for such issues.

The Register Committee has further restructured its overview of precedents. This had previously been maintained as a collection of summaries of decisions on all previous applications. The new, reorganised overview of precedents is structured along parts 2 and 3 of the ESG, and contains a collection of interpretations and conclusions drawn by the Register Committee with regard to each standard and guideline. This includes references to where the precedents occurred.

2.6 Complaints Policy

EQAR had received a complaint about a registered quality assurance agency in 2010, which was deemed unsubstantiated. The case, however, showed a need for guidelines allowing complainants to formulate their concerns in a substantiated manner and on the basis of considerations relevant to EQAR, i.e. with reference to the European Standards and Guidelines (ESG).

In order to streamline complaints, the Register Committee adopted a Complaints Policy in 2011. It is publicly available on the EQAR website: <http://www.eqar.eu/publications/official.html>

2.7 Interpretations of principle regarding the ESG

The Register Committee faced a question of principle related to the ESG requirement relating to the official status of quality assurance agencies (ESG 3.2).

The Register Committee is required to make a judgment on the substance of applicants' activities and their compliance with the ESG. Considering the wording of both the ESG and EQAR's general objectives, the Register Committee concluded that there is no requirement in principle to have a permanent national mandate in order to be considered an agency within the remit of the ESG.

ESG 3.2 stipulates that agencies "should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibility for external QA". This might be interpreted in a broad sense and cannot be the sole reason for rejection, as no other single stipulation of the ESG has been used in that way.

The Register Committee has always applied and interpreted the ESG in each specific case and made a holistic judgement on every application, considering and weighing applicants' level of compliance with the various individual ESG. Failure to comply with one

particular stipulation has always been considered within that holistic judgment. The level of compliance with ESG 3.2 does therefore not prejudice the agency's compliance with the other ESG.

2.8 Review of the ESG

In the context of the E4 Group's project to map the application and implementation of the ESG (MAP-ESG), the Register Committee reflected on the use of the ESG as criteria for the Register and discussed its resulting observations.

These reflections are set out in the statement "EQAR Input to the MAP-ESG Project" in August 2011 (see Annex 8), which was submitted to the project's Steering Group and Advisory Board. EQAR was part of the Advisory Board of the project and contributed to its work on the basis of the statement.

Criteria and application process

Inclusion on EQAR is open to all quality assurance agencies that substantially comply with the European Standards and Guidelines for Quality Assurance (ESG). This has to be evidenced through an external review by a team of independent experts.

The Register Committee makes its decision based on the external review report, the applicant's self-evaluation report and further documentation where appropriate. Unsuccessful applicants have the possibility to file an appeal in line with EQAR's Appeals Procedure.

Further information on the application process and requirements for the external review process is available from the EQAR website and in the Guide for Applicants: <http://www.eqar.eu/application.html>

/// Recognition of Registered Quality Assurance Agencies

In the objectives formulated for EQAR it is set out that the Register should “provide a basis for national authorities to authorise higher education institutions to choose any agency from the Register, if that is compatible with national arrangements” (E4 Report to the London Summit, 2007).

When mandating the E4 Group to establish EQAR at their 2007 London Summit, European ministers of higher education formulated the expectation that EQAR should “facilitate the mutual



EQAR Register Committee, hosted in Vienna by Universities Austria



EQAR Register Committee, hosted by the Austrian Union of Students (ÖH)

recognition of quality assurance and accreditation decisions” (London Communiqué), which was then also reflected in EQAR’s Mission Statement.

The following table provides an overview of the countries in the European Higher Education Area (EHEA) that have taken the necessary steps at national level to recognise officially all EQAR-registered agencies, in terms of accepting their decisions in specific circumstances or allowing higher education institutions to choose any agency from the Register.

Austria:

In July 2011 the Austrian parliament passed a law to re-organise the external quality assurance system for higher education. In the new system, public universities are obliged to undergo regular institutional audits by the Austrian national QA agency or any other agency that is included on EQAR. The same rules apply to university colleges after having been initially accredited.

Bulgaria:

Since August 2011 Bulgarian higher education institutions (HEIs) have the possibility to commission a foreign EQAR-registered QA agency for their compulsory accreditation, at programme as well as institutional level. The foreign agency will have to use the same criteria and mark-based system as the national agency, NEAA.

Denmark: Erasmus Mundus joint programmes, offered by Danish and foreign institutions in cooperation, do not require additional accreditation by the Danish national quality assurance agency, if they are accredited by any EQAR-registered agency.

Danish institutions may only issue Danish diplomas for programmes offered abroad if they are accredited either by the national Danish agency or an “internationally recognised” agency. If an agency is registered on EQAR, it is automatically considered “internationally recognised”; otherwise, it has to prove this in an individual procedure to the Danish authorities.

Germany: For their periodic accreditation of their study programmes or quality assurance systems German Higher education institutions (HEIs) can choose from amongst QA agencies that are accredited by the German Accreditation Council, a national regulatory body. These agencies can also ratify individual accreditation decisions by other agencies on joint programme between a German and foreign institution. This is subject to the agency being registered on EQAR or a full member of ENQA.

Liechtenstein: Liechtenstein legislation requires the higher education institution to seek accreditation by any EQAR-registered agency. The country has decided not to establish an own national agency.

Lithuania: Lithuanian HEIs are subject to regular accreditation at both institutional and programme level. For programme accreditation HEIs can opt for an external review undertaken by any EQAR-registered QA agency. The actual accreditation decision, however, remains the responsibility of the national QA agency.

Poland: Polish HEIs may request foreign EQAR-registered QA agencies to conduct an external accreditation review, whereas the accreditation decision is taken by the Polish Accreditation Commission (PKA, the national agency). HEIs are further required to be reviewed by an EQAR-registered agency in order to apply for the right to offer doctorate degrees.

Foreign higher education institutions (HEIs) that have been accredited by any EQAR-registered agency have the right to establish branch HEIs or departments in Polish.

Romania: HEIs in Romania are subject to (initial) accreditation by the national QA agency, ARACIS. Once the HEI is accredited it is obliged to undergo periodic external evaluations. For these evaluations, HEIs can choose freely from amongst the registered agencies.

External Evaluation of EQAR

When mandating the E4 Group to establish EQAR, European ministers asked the E4 organisations “to ensure that after two years of operation, the register is evaluated externally, taking account of the views of all stakeholders” (London Communiqué 2007).

The evaluation was carried out during 2010 and 2011, and was coordinated by a Steering Group working under the auspices and with the support of the Council for Higher Education Accreditation (CHEA, USA).

4.1 Self-Evaluation Report

The EQAR Self-Evaluation Group (SEG) presented the EQAR Self-Evaluation Report to the General Assembly in March 2011 and subsequently finalised the Report and submitted it to the External Evaluation Panel.

The EQAR Self-Evaluation Report is now available publicly at:

<http://www.eqar.eu/about/external-evaluation.html>

4.2 Evaluation Panel and Interviews

The Evaluation Panel was appointed by the Steering Group in January 2011 and included:

/ Sir John Daniel (Chair), President and Chief Executive Officer, Commonwealth of Learning, Canada

/ Barbara Brittingham, President/Director of the Commission of Institutions of Higher Education, New England Association of Schools and Colleges, USA

/ Liam Burns, President of NUS (National Union of Students) Scotland

/ Eduardo Marçal Grilo, Professor and Member of the Board of Trustees of the Calouste Gulbenkian Foundation, Portugal

/ Lis Lange, Senior Director, Institutional Research and Academic Planning, University of the Free State, South-Africa

/ Pall Skúlason, Professor of Philosophy at the University of Iceland

/ David Parry (Secretary to the Panel), Higher Education consultant, United Kingdom

The Panel conducted a site visit to Brussels on 12 – 14 May 2011 and interviewed all EQAR committees (Executive Board, Register Committee, Appeals Committee), staff, stakeholder organisations (ENQA, ESU, EUA, EURASHE, BUSINESSEUROPE, Education International), international organisations (European Commission, Council of Europe, UNESCO) and samples of Governmental Members, non-member European Higher Education Area (EHEA) governments and registered as well as non-registered quality assurance agencies.



Site visit of the External Evaluation Panel to EQAR



EQAR Members' Dialogue, Vienna

4.3 External Evaluation Report and Recommendations

The Panel submitted its draft Evaluation Report to EQAR in August 2011 for comment on factual accuracy. The Steering Group then officially submitted the Panel's final report to EQAR in September 2011.

The Evaluation Report, including an overview of specific recommendations is included as part II of this publication ([page 20](#)). EQAR's response "Strategic Priorities and Follow-Up of the External Evaluation of EQAR" is included as part III ([page 34](#)).

4.4 EQAR Members' Dialogue

On 21 and 22 November 2011 EQAR organised the first EQAR Members' Dialogue, gathering its governmental and stakeholder members as well as EQAR committee members. The event was hosted by the Austrian Federal Ministry of Science and Research (BMWF).

The objective of the Members' Dialogue was to discuss the results of the external evaluation and the follow-up to the Panel's recommendations under the overarching topic "Developing Strategies to Enhance the Impact and Relevance of EQAR".

The results of the Members' Dialogue formed the basis of the discussion and adoption by the General Assembly of "Strategic Priorities and Follow-Up of the External Evaluation of EQAR", setting out the actions envisaged by EQAR with regard to the various recommendations by the Panel.

5.1 Website

The website is EQAR's main communication tool to address its target audiences. It includes general information on EQAR, information about the Register Committee's decision, guidance for applicant quality assurance agencies and other EQAR statements or publications.

The number of visits has been constantly increasing, with an average of about 7 000 visits per months in 2011 (2010: ca 6 000, 2009: ca 5 000).

A new overview has been added to the website of examples of national legislation allowing higher education institutions (HEIs) to work with all registered agencies, or using EQAR as a reference to recognise results or decisions of foreign quality assurance agencies. It contains key information on respective legislation in European countries, based on information provided by the competent national authorities (see also section 3).

The publication section of the website has been reviewed and restructured so as to allow easy and straight-forward access to all types of publication by EQAR (official documents, statements, annual reports, etc.).



Presentation of the External Evaluation key findings at the European Quality Assurance Forum

5.2 Representation and Relations with Partners

EQAR was represented in all major conferences and seminars concerned with quality assurance of higher education in the European Higher Education Area (EHEA).

In a number of events EQAR was invited to contribute actively, including both events with a European remit as well as events targeting primarily stakeholders and the public in a specific country. A selection of presentations on EQAR has also been made available on the EQAR website for access by the public.

EQAR was invited to present a summary of the results of the external evaluation to the Bologna Follow-Up Group (BFUG) as well as in a special session at the European Quality Assurance Forum (EQAF, November 2011, Antwerpen).

EQAR received a number of visits from and gave interviews to various quality assurance agencies, researchers or stakeholder organisations with an interest in EQAR's work. This included contacts with some non-European researchers and organisations.

6.1 Statutory Bodies

The General Assembly of March 2011 elected Helka Kekäläinen, Vice-President of ENQA, to the EQAR Executive Board replacing Emmi Helle, who had resigned from the Board before.



EQAR General Assembly 2011 in Gödöllő, Hungary

Since 1 April 2011, the Board members have been assuming the following functions:

President: Andrea Blättler (ESU)

Vice-Presidents: Lesley Wilson (EUA) and

Andreas Orphanides (EURASHE)

Treasurer: Helka Kekäläinen (ENQA)

The General Assembly re-elected the chair, deputy chair, two members and one deputy member of the Appeals Committee for a mandate until 2015.

The composition of all EQAR statutory bodies is included in Annex 5.

6.2 Accounts

EQAR relies on a diversified funding base, including annual contributions from its governmental members (76%) and stakeholder members (8%), as well as application and listing fees paid by registered quality assurance agencies (14%).

2011 was the first financial year in which EQAR operated without start-up funding from the European Commission, which had been available to EQAR until December 2010.

The external evaluation of EQAR incurred extraordinary expenditure of about EUR 43 000 in the financial year 2011. Furthermore, the first EQAR Members' Dialogue incurred additional costs.

The financial year therefore resulted in a deficit of EUR 45 448,41. Had the extraordinary costs not been incurred the year would have resulted virtually break-even. The extraordinary costs were already foreseen in the 2011 budget agreed by the EQAR General Assembly. For 2012, a balanced budget without major extraordinary costs was agreed, and no deficit is expected in 2012 and the following years.



EQAR Register Committee meeting, Brussels

Balance Sheet

Assets		Liabilities	
Fixed assets	988,64	Own funds	116 766,25
Guarantees	147,66	Profit/loss previous years	82 214,66
Office equipment	840,98	Result per 31/12/2011	-45 448,41
Liquid assets	141 503,35	Reserves	80 000,00
Receivables up to 1 year	15 815,38	Liabilities	25 725,74
Cash	115 668,68	Payables up to 1 year	25 725,74
Adjustment accounts	9 999,29	Adjustment accounts	0,00
TOTAL	142 491,99	TOTAL	142 491,99

Profit and Loss Account

Income		Expenditure	
Membership fees	184 500,00	Travel and subsistence	61 058,66
Agency fees	31 587,59	Office and administration	40 420,62
Other income	2 417,83	Staff	105 811,82
		External evaluation	43 406,16
		Other costs	15 534,37
Operational income	218 505,42	Operational expenditure	266 231,63
Operational result	-47 726,21	(see notes above)	
Financial income	2 672,47	Financial costs and taxes	394,67
Total result	-45 448,41	(see notes above)	

//// EXTERNAL EVALUATION OF EQAR – FINAL REPORT

This is the main body of the Panel's report. The full version, including all appendices, as well as the EQAR Self-Evaluation Report, can be accessed at:

<http://www.eqar.eu/about/external-evaluation.html>

1. Introduction

1.1 This is the report of the panel of experts (the Review Panel) appointed by the Steering Group [Note 1] established by the E4 Group [Note 2] to conduct an external evaluation of the European Quality Assurance Register for Higher Education (EQAR). The review reflects the decision of the London ministerial summit in May 2007 which asked the E4 Group to establish EQAR and ensure that it was externally evaluated after two years of operation.

2. Terms of Reference

2.1 The Review Panel was invited to address three questions. These are given below.

/ Are the organisational structures and methods of EQAR fit for purpose in the light of the agreed objectives? Have they functioned effectively and efficiently in practice?

/ What has been the initial impact of EQAR? Is it in line with the desired goals?

/ What improvements are desirable? How might the organisation develop and act further with a view to best achieving its mission and objectives?

The full Terms of Reference are attached as Appendix 1.

2.2 The Review Panel's Terms of Reference were agreed between EQAR and the Steering Group in October 2010. This followed preparatory work undertaken by the Steering Group working under the auspices and with administrative support provided by the Council for Higher Education Accreditation in the USA.

3. Review Panel membership

3.1 It was agreed that the evaluation would be carried out by a panel of experts in quality assurance of higher education and the

workings of organisations in general. It was considered desirable for the panel to include members with a broad range of experience in relation to higher education and the Bologna Process [Note 3] in general and cover the perspectives of relevant stakeholders, in particular, higher education institutions, students and quality assurance bodies and involve a significant number of members representing a non-European perspective.

3.2 The appointment of the Review Panel was the responsibility of the Steering Group. EQAR was invited to raise substantiated objections in respect of proposed panel members. A list of the Panel members is given in Appendix 2². The Steering Group was given responsibility for designating one Panel member as Chair and one as Secretary. The Secretary was a full member of the Panel and was responsible for drafting the evaluation report in consultation with the Panel and under the direction of the Panel Chair, Sir John Daniel, President and Chief Executive Officer of the Commonwealth of Learning.

4. Acknowledgments

4.1 The Review Panel would like to thank all those who met the Panel in person in Brussels or by teleconference between 12 and 14 May 2011 and those whom members of the Panel contacted subsequently by telephone. The Panel is grateful for their availability, perspective and candour. A full list of those involved is contained in Appendix 3.

4.2 The Review Panel would also like to thank Judith Eaton who, as part of her role as Chair of the Steering Group, had overall responsibility for the recruitment and appointment of the Panel, the provision of briefing to Panel members, ensuring that the evaluation process was conducted in line with the Terms of Reference and providing logistical and administrative support to the Panel. All this she did with enviable efficiency and grace, seemingly oblivious to the different time zones in which she was working.

4.3 Finally, the Review Panel would like to thank Colin Tuck, the Director of EQAR, and Annelies Traas, Executive Officer in the EQAR Secretariat. Their attention to even the smallest logistical and technical detail and their immediate response to the Panel's requests for additional documentary material was greatly appreciated and ensured that the Panel was able to focus on its task for the three days of its visit.

5. Evidence base for the review

5.1 The Self-Evaluation Report (SER) produced by EQAR was a concise and valuable resource for the Review Panel. The report itself was supported by a number of appendices containing necessary contextual information (including, for example, details of the members and meetings of the Self-Evaluation Group, Ministerial Communiqués and EQAR Statutes etc) and evidence upon which the self-evaluation had been based (including, for example, feedback on the guidance for applicants, a summary of interviews with governments and stakeholders, and the results of a survey of quality assurance agencies). Much of the descriptive information relevant to the Panel's findings can be found in the SER (with which the Panel assumes familiarity on the part of the reader) and is not repeated in this report.

5.2 A list of the additional documentation requested by the Review Panel during its

meetings in Brussels is contained in Appendix 4. The programme of face-to-face meetings and teleconference calls between 12 and 14 May and subsequent one-to-one telephone conversations with stakeholders unavailable at that time is contained in Appendix 5.

6. Considerations

6.1 In undertaking its review, the Review Panel was influenced by four matters in particular which Panel members agreed should be highlighted at the outset.

6.2 The first was the fact that the Review Panel's Terms of Reference specifically excluded the Panel from evaluating:

- / the Ministerial decision to establish a register of quality assurance agencies as an independent, stakeholder-driven organisation;
- / the decision to use the European Standards and Guidelines (ESGs) as criteria for admission to the Register; and
- / the ESGs themselves.

6.3 Secondly, the Ministerial decision to undertake a review after two years limited the amount of time for EQAR to operate and therefore the volume of evidence available to evaluate its operation. More significantly, it limited the opportunity for evidence to evaluate the impact of EQAR, a point made by a number of those to whom the Review Panel spoke, and the extent to which the review could be either summative or formative.

6.4 Thirdly, whilst acknowledging that the decision to use the ESGs as criteria for admission to the register and the ESGs themselves were specifically excluded from the Review Panel's evaluation, the Panel, nevertheless, noted that the ESGs had been established primarily as tools for development, enhancement and capacity building rather than for registration purposes. Research evidence and practical experience suggest that there is always a tension between criteria and processes designed with assurance, compliance and accountability objectives in mind, and those with enhancement and developmental objectives in mind. This tension was noted by a number of those to whom the Panel spoke.

6.5 Fourthly, the Review Panel was mindful of the fact that EQAR was the first legally established organisation to emerge directly from the Bologna Process. This has had implications for the make-up and operation of EQAR, in particular the membership of its General Assembly (see paragraph 7.2).

6.6 The particular requirements of the Review Panel's Terms of Reference and the more general considerations above should be borne in mind when reading this report and its recommendations.

6.7 The Review Panel's recommendations are listed in Appendix 6 for ease of reference.

7. Summary of the key organisational features of EQAR and of the Review Panel's findings

Organisational features Objectives

7.1 EQAR was established in March 2008 as an International Non-Profit Association under Belgian law. The Statutes of EQAR set out that EQAR:

'... pursues the objective of furthering the development of the European Higher Education Area by enhancing confidence in higher education and by facilitating the mutual recognition of quality assurance decisions. [...] In order to achieve its objectives, [EQAR] establishes and manages a list of quality assurance agencies [...] that operate in substantial compliance with the [European] Standards and Guidelines for Quality Assurance ...'.

Wider goals and objectives for EQAR are set out in its mission statement, which was adopted by the first General Assembly in June 2008, and are contained in Appendix 7.

Governance

7.2 The Association's Members are the four Founding Members, (the E4 Group see paragraph 1.1 and Note 1), two Social Partner Members (Business Europe and Education International) as well as (currently) 26 European countries who are Governmental Members. The General Assembly (GA) consists of all 32 Members and is the supreme decision-making body of EQAR, except for decisions on inclusion on the Register. In addition, the General Assembly has four permanent observers, namely:

- / The Council of Europe;
- / UNESCO;
- / The European Commission; and
- / The Bologna Secretariat.

A full list of all the members is contained in Annex VII of the SER.

Management

7.3 Responsibility for ensuring that EQAR operates effectively rests with three committees, namely:

- / the Executive Board;
- / the Register Committee; and
- / the Appeals Committee

The function and membership of each committee are described briefly below.

7.4 The Executive Board (EB) is responsible for the management of EQAR as an association, including administrative and financial matters and strategic coordination. It is made up of five members, one from each Founding Member and the Chair of the Register Committee, who is an ex officio member without voting rights. The EB is elected by the General Assembly for a two-year mandate and normally meets four times annually.

7.5 The Register Committee is responsible for deciding on applicants to be included on the Register. It exercises this responsibility independently to the extent that its decisions do not require approval or ratification by any other body, but it produces an annual report for the GA. The Committee is made up of 11 members. The four Founding Members nominate two members each and the two Social Partner Members one each. The Chair is elected by the nominated members and co-opted onto the Register

Committee as its eleventh member. Five governments are nominated by the Bologna Follow-Up Group (BFUG) [Note 4] as observers on the Register Committee. The GA approves the Register Committee as a whole for a two-year mandate. It can only refuse the block nomination and not single nominations. Nominees may not currently hold a representative function or be a staff member of the nominating organisation.

7.6 The Appeals Committee is responsible for considering appeals against decisions of the Register Committee. It is made up of six members, including a Chair, who are elected by the GA for a mandate of four years. Members of the Appeals Committee may not serve on any other body of EQAR. Its Chair must be a senior judge, lawyer or legal expert. The Appeals Committee convenes as necessary when appeals have to be considered. At the time of the Review Panel's visit in May 2011, the Committee was considering its first appeal.

7.7 The General Assembly and its committees are supported by a Secretariat which is responsible for the day-to-day management and operation of EQAR. It comprises a full-time Director and a part-time Executive Officer.

Criteria

7.8 The EQAR SER describes the rules and criteria for applicants wishing to be

admitted to the Register. The key criterion is that an applicant agency must demonstrate 'substantial' compliance with the ESGs as determined by an independent review of an agency applying for registration. EQAR accepts reviews carried out at national level as well as those co-ordinated internationally for the purpose of ENQA membership, EQAR registration and/or other purposes. EQAR acknowledges that this means that it often has to work with reports produced for purposes other than registration, involving procedures that are outside its control and base its decisions on reports produced, in some cases, some time before a decision on registration is made. Any evidence or information generated after the production of a report is not externally reviewed and is thus only taken into account to a limited extent.

Rapporteurs

7.9 A key role in the scrutiny of each application is played by rapporteurs who are responsible for analysing application documentation and preparing recommendations for consideration by the Register Committee, all of whose members act as rapporteurs on a rotating basis. Two members of the Committee are appointed as rapporteurs for each application. They act independently, reviewing documentation and recording their comments using an EQAR template. Those comments are then exchanged between the rapporteurs who discuss their findings, seek additional information for clarification if necessary, and then set out their agreed findings for a third rapporteur to review. A third rapporteur was introduced for the third application round, in the autumn of 2009, in order to strengthen the assessment process and enhance consistency. The views of all three rapporteurs on an application are placed before the Register Committee. Rapporteurs are not paid a fee for the work undertaken by them evaluating applications for registration, although each Committee member receives an annual Honorarium of €1,000.

Judgements

7.10 The Committee can:

- / approve an application;
- / request further clarification; or
- / consider rejecting an application.

7.11 Only twice thus far has an application been deferred pending further clarification. Indeed, it was not clear to the Review Panel what further clarification, other than technical information available to all applicants, could be provided. An applicant can also

withdraw an application instead of providing further clarification or making additional representation. There is no possibility of conditional acceptance of an application.

Effectiveness

7.12 The Register Committee has considered applications from 34 (approximately 50%) of the estimated 60-70 quality assurance agencies in Europe [Note 5]. Of the 34 applications received:

- / 24 had been approved and were now on the Register
- / 3 had been rejected
- / 3 had been withdrawn (including one from outside Europe)
- / 4 were in the process of being considered at the time of the review and one application previously rejected was providing additional representation

7.13 Eight full ENQA members had not applied for registration at the time of the review. In addition, at the time of the review, the Appeals Committee was considering an appeal against the decision of the Register Committee not to admit the applicant to the Register.

Efficiency

7.14 EQAR's Secretariat has 1.6 FTE staff (see paragraph 7.7) and an annual turnover of approximately €300,000. It makes good use of space, including sharing facilities with other organisations. EQAR does not conduct its own external reviews of applicant agencies but uses reports produced for other purposes (see paragraph 7.8). As already noted (see paragraph 7.9) rapporteurs are not paid a fee for the significant work undertaken by them evaluating applications for registration.

Summary

7.15 In the view of the Review Panel, much has been achieved by EQAR in the first two years of its existence. More than 50% of potential applicants were considered in that period (see paragraph 7.12). This has been achieved with a very small secretariat and relatively modest funding. The need to establish the Register as rapidly as possible and to do so with minimal resources has meant an emphasis at all levels of the organisation on operational matters with less time available for strategic and/or policy considerations. In addition, it is significant that, of those still to be registered, nine are full ENQA members and, presumably, meet the de facto criteria for EQAR registration. The relationship between EQAR and ENQA is considered in more detail in paragraphs 8.29 to 8.31.

Impact

Desired goals

7.16 As already noted (see paragraph 6.3), the Ministerial decision to undertake a review after two years limited the volume of evidence available to evaluate EQAR's operation and its impact. Indeed, a number of those who met the Review Panel indicated that, in their view, EQAR had not been in existence long enough for them to have sufficient evidence to be able to form a view on aspects of EQAR's work and impact. For these reasons the views and recommendations of the Panel are formative rather than summative.

7.17 The formal objectives of EQAR are noted at paragraph 7.1. Underpinning these objectives was a desire on the part of the E4 Group to:

- / promote student mobility by providing a basis for the increase of trust among higher education institutions;
- / reduce opportunities for dubious organisations or 'accreditation mills' to gain credibility;
- / provide a basis for national authorities to authorise higher education institutions to choose any agency from the Register, if that is compatible with national arrangements;
- / provide a means for higher education institutions to choose between different agencies, if that is compatible with national arrangements;

/ serve as an instrument to improve the quality of quality assurance agencies and to promote mutual trust amongst them.

These wider objectives are also reflected in the mission statement adopted by EQAR (see paragraph 7.1).

Summary

7.18 In the view of the Review Panel, the SER appeared not to have had, or to have devoted significant resources to evaluating EQAR's impact on the above. The Panel was mindful of the fact that in some areas, for example, student mobility, the impact of EQAR is likely to be indirect rather than direct. Nevertheless, the Panel reflected on whether the absence in the SER of evidence of progress in achieving the objectives above was a matter of capacity; another indication of the limited attention paid to strategic matters within EQAR referred to in paragraph 7.15; or the complexity of establishing and running an agency such as EQAR. Whatever the reason, EQAR would benefit from establishing criteria indicating progress in meeting the objectives referred to in paragraph 7.17.

Improvements

7.20 EQAR's SER describes and evaluates its operations under different aspects of the three main questions formulated in the Terms of Reference of the current review. Each section of the SER ends with EQAR's own evaluation of its performance and proposes an action plan. As already indicated (see paragraph 6.7), the Review Panel's own findings and recommendations are listed in Appendix 6. They are considered in detail alongside those of EQAR in section 8 of this report.

8. Detailed findings of the Review panel

Term of Reference One: Are the organisational structures and methods of EQAR fit for purpose in the light of the agreed objectives? Have they functioned effectively and efficiently in practice?

EQAR self-evaluation

8.1 Part 3 of EQAR's self-evaluation considered this Term of Reference and concluded that '... by and large, stakeholders and governments consider the organisational structures of EQAR fit for purpose. While experiencing a number of typical challenges of new organisations, such as the internal communication between its bodies, EQAR finds that its structures have worked effectively and efficiently. EQAR considers ensuring broader support and engagement of governments as well as securing sufficient resources for its work as the main future challenges ...'. EQAR's proposed actions are listed in Appendix 8a.

8.2 In broad terms, the Review Panel concurs with EQAR's self-evaluation above and the proposed actions that are contained in Appendix 8a. In the view of the Panel, however, additional changes to EQAR's organisational structures and methods are appropriate if it is to improve its effectiveness and efficiency. The Panel also considers that there should be greater focus on strategic issues. These are considered in more detail in paragraphs 8.4 and 8.5.

8.3 Part 4 of EQAR's self-evaluation considered the work of the Register Committee in particular and concluded that '... external stakeholder feedback (did) not show major concerns ...' with regard to the consistency, fairness and proportionality of the decisions of the Committee. EQAR's proposed actions are listed in Appendix 8b. Again, the Review Panel concurs in broad terms with the proposed actions, to which reference is made, as appropriate, below.

Strategic focus

8.4 As already noted (see paragraph 7.15) the need to establish the Register as rapidly as possible and to do so with minimal resources resulted in an emphasis on operational as opposed to strategic and/or policy considerations. This approach was supported by some to whom the Review Panel spoke who argued that EQAR's role is regulatory not strategic and that to take on a more strategic role would involve 'mission drift' and could duplicate the work done by other Europe-wide organisations, including some represented on its General Assembly. This was not a universally held view amongst those to whom the Panel spoke. Nor does it reflect the view of the Panel.

8.5 In the view of the Panel, it is desirable for EQAR to agree on its strategic priorities and incorporate these into a strategic plan. In addition, EQAR is increasingly likely to be asked by other organisations and institutions for views on a range of higher education matters, in particular, quality assurance in higher education, to which it should be able to respond in a well-informed and authoritative way. If EQAR were to devote resources to enable it to take on this more strategic function, it would enhance both its credibility and capability. Given the above, it is recommended that the General Assembly should amend its Statutes (Article 10) by adding strategic planning to its current list of functions. The day-to-day responsibility for this activity should be delegated to the Executive Board.

The General Assembly

8.6 The successful operation of EQAR requires both political sensitivity and technical competence. Neither is easily or speedily acquired and both should be available to the organisation for a reasonable length of time if the organisation is to benefit. At present, the length of time that a person can represent a Member on the General Assembly is not specified. This may result in a high turnover of personnel affecting, in turn, consistency in decision-making and could deprive the Assembly of the benefit of organisational self-knowledge in its debates. Whilst acknowl-

edging the need to ensure awareness of, and the relevance of Members' experience and expertise to, changing external circumstances, it is recommended that EQAR promotes with the organisations nominating representatives to the General Assembly the benefits to EQAR of ensuring, as far as possible, that those representing them remain on the Assembly for three years renewable for a further three years. This recommendation may have some practical implications for student representation on the General Assembly, but it should be possible to make alternative arrangements. The same proviso concerning student representation is relevant to the recommendations in paragraphs 8.7 and 8.8.

The Executive Board

8.7 For similar reasons, it is recommended that members of the Executive Board should serve an initial mandate of at least three years (currently two years) renewable for up to two times (currently three times). This formula would not increase the overall length of time that an individual could serve on the Executive Board but would help to ensure that each Board member had a reasonable opportunity, and incentive, to make a significant contribution to the work of the Board in his/her first term of office and, hopefully, encourage productive and conscientious members to consider offering themselves for a second term.

The Register Committee

8.8 The successful operation of the Register Committee is critical to the effectiveness and credibility of EQAR. The requirement enshrined in Article 17 [4] of EQAR's Statutes that the Committee should deliberate and make its decisions independent of any other body is a key aspect of its operation. The Committee appears to have successfully established and jealously maintained its independence in the first two years of its operation - a point acknowledged by a number of those whom the Review Panel met - and is to be commended for this. In view of the technical expertise required for the Committee's successful operation, especially given the role of Rapporteur played by Committee

members (see paragraph 7.9), and the importance of ensuring consistency in decision-making, it is recommended that members of the Register Committee should serve an initial mandate of at least three years (currently two years) renewable for up to two times (currently three times). As with the Executive Board (see paragraph 8.7) the overall length of service of each member is not increased by this recommendation. Paragraph 8.15 considers the role of observers on the Register Committee.

Criteria for registration

8.9 EQAR's Procedures for Applications state that, to be included in the Register, applicants need to demonstrate '... that they operate in substantial compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area ... attested through an external review ...'. The Procedures go on to say that full ENQA membership '... normally constitutes satisfactory evidence for substantial compliance with the ESG ...'.

8.10 These statements notwithstanding, one agency withdrew its application due to what was described as the '... meta-level nature of its activities ...'. Another agency was rejected because it was '... not a quality assurance agency as envisaged by the ESG ...'. The application of a third agency was deferred because the Register Committee did not consider that the external review report provided sufficient evidence that it substantially complied with the ESG.

8.11 Where an agency whose application was rejected had already been admitted into ENQA (whose membership criteria require substantial compliance with ESGs), such a decision could be puzzling to say the least. Or where an applicant failed to meet what might be regarded as 'technical' criteria, for example, by submitting an evaluation report produced by a review panel that did not include a student member, the introduction of some form of pre-application scrutiny or advice could result in an application being deferred rather than proceeding to application and inevitable rejection.

8.12 In its own self-evaluation, EQAR proposes to revise the current Procedures for Applications by introducing formally a two-step procedure allowing for a distinction between the rejection of an application on the grounds of not meeting what it describes as the 'eligibility standards', namely the requirement for an external review, as opposed to not meeting the substantial criteria, namely the ESGs. In addition, noting that communicating the fact that the nature of the ESG and the approach of 'substantial compliance' cause some inherent difficulties and constraints, EQAR proposes making its own understanding and application of substantial compliance with ESG more transparent. Given these various considerations, it is recommended that EQAR should clarify its current criteria for establishing prima facie organisational eligibility to apply for registration. This would avoid unnecessary expenditure of time and reduce confusion and misunderstanding. It might also reduce confusion if the phrase 'eligibility criteria' or 'requirements' was used rather than eligibility 'standards' thus avoiding the appearance of having two sets of standards.

Confidentiality and transparency

8.13 In support of what it believed to be an appropriate degree of confidentiality for those involved when it began considering applications for registration, EQAR has thus far chosen not to make public the names of those agencies which have applied for registration, nor its decision on each application. Nor does EQAR currently publish reports of the Register Committee. This level of confidentiality may have been appropriate when EQAR's registration arrangements were new and its credibility as an organisation untested. In the view of the Review Panel these arguments no longer apply.

8.14 Notwithstanding the recommendations for procedural change made above (see paragraphs 8.5, 6, 7, 8 and 8.12) the Panel believes that the procedures now in place are sufficiently robust and the credibility of EQAR sufficiently well established for its initial concern for confidentiality no longer to be justified.

Indeed, there is now evidence from those to whom the Review Panel spoke, and from within EQAR itself, to suggest that to continue with such a policy is likely to have a negative effect on EQAR's reputation and the credibility of the Register. EQAR's own self-evaluation led it to the conclusion that it should review its policy of confidentiality of applicants and consider whether full transparency, of successful and unsuccessful applications, would better serve its goal of transparency. Given these considerations, it is recommended that EQAR should enhance the transparency of its decision-making by making public the:

- / names of each applicant which satisfies organisational eligibility criteria; and
- / Register Committee's decision on each application.

8.15 Article 15 [3] of EQAR's Statutes makes provision for five governmental authorities to be nominated by the Bologna Follow-Up Group (BFUG) as observers on the Register Committee. The Review Panel did not hear a convincing rationale for this provision. Instead, the Panel noted that each observer is already a member of the General Assembly, to which the Register Committee now provides an annual report of its activities. In addition, the Committee is an expert as opposed to 'political' committee. Finally, applicants unhappy with a decision of the Committee may lodge an appeal, such appeals being heard by the Appeals Committee established for the purpose by the General Assembly. In the view of the Panel, observers may have made sense when the registration process was being established and tested. Given the points made above, however, and if the recommendations in paragraph 8.14, supporting greater transparency in its procedures, and in paragraph 8.31 clarifying EQAR's relationship with ENQA, are accepted and implemented, it is recommended that observers should no longer be appointed to the Register Committee.

8.16 One final recommendation that the Review Panel wishes to make in this section of its report is that each element of EQAR

– the General Assembly and all three of its committees – should evaluate formally their effectiveness on a regular basis.

Promotion and publicity

8.17 Reference was made in paragraphs 8.1 and 8.2 to EQAR's own self-evaluation of its organisational structures and methods of operation in the light of its objectives and whether they had functioned effectively and efficiently in practice. Appendix 8a lists its proposed actions in response to this self-evaluation. Some of the recommendations, for example, to encourage governmental and stakeholder members on the General Assembly to promote EQAR more actively among their constituencies and beyond and to address the functions of and relations between EQAR's statutory bodies, are reflected in the next section of this report (see paragraphs 8.29 to 8.34).

Resources

8.18 The Review Panel would concur with EQAR's own conclusion concerning the need to explore possible additional resources. This would enable the Secretariat to support more effectively the work of EQAR's various committees, in particular the Register Committee, and also consider strategic developments and options as noted in paragraphs 8.4 and 8.5 of this report. The Panel is mindful that its proposals have financial and human resource implications the impact of both of which could be reduced if EQAR was to consider secondments for certain projects and activities.

Term of Reference Two: What has been the initial impact of EQAR? Is it in line with the desired goals?

EQAR self-evaluation

8.19 Part 5 of EQAR's self-evaluation considered its initial impact and concluded that it had had '... a significant impact on 'soft' factors and (was) considered important by quality assurance agencies in order to demonstrate credibility in terms of alignment to European standards. The impact on 'hard' factors,

such as official recognition of the registered agencies' activities in other countries, (had) begun to develop ...'. EQAR's list of proposed actions is contained in Appendix 8c. The Review Panel's own recommendations complement the proposals of EQAR.

8.20 In considering this Term of Reference, the Review Panel focused during discussions with those whom it met in May, not only on EQAR's formal objectives (see paragraph 7.1) but also on the E4 Group's more detailed expectations of what the Register might achieve (see paragraph 7.17). The evidence of impact in these areas was mixed. The Panel was conscious of the fact that EQAR's impact in some of these areas is likely to be indirect rather than direct.

Student mobility

8.21 This is the case, for example, in the area of student mobility. Some representatives of agencies on the Register who met the Review Panel indicated that registration had not yet affected student mobility. EQAR's SER noted that Erasmus Mundus joint programmes offered by Danish and foreign institutions in co-operation do not require additional accreditation by the Danish national quality assurance agency if they are accredited by another EQAR-registered agency. Whether mobility has increased, however, and whether that increase is the result of registration is difficult, and too early, to judge.

Accreditation mills

8.22 EQAR's SER made no reference to the impact of the Register on the opportunities for accreditation mills. One representative to whom the Review Panel spoke suggested that the Register had the potential to provide what was described as a 'white list' of genuine institutions. What was not clear was what impact the existence of the current list had already had on the number of bogus accreditation agencies or degree mills.

Competition

8.23 There was virtually no evidence of a national government agreeing to allow an EQAR-registered agency from another country to operate in its own country. There was some evidence of EQAR-registered agencies within a country being allowed to 'compete' for business but this was limited. Nor was there any evidence of higher education institutions choosing to be approved or accredited by a quality assurance agency in another country on the grounds that it was on the Register.

Improvement in the quality of quality assurance

8.24 There was some evidence of the potential for improvement in the quality of quality assurance agencies to the extent that one registered agency had been asked for advice and assistance by an agency considering applying for registration.

What was more apparent to the Review Panel, however, was that the impact of EQAR registration of an agency is likely to be greater in a country whose higher education system is less well developed. Such agencies might derive relatively more benefit from being on the Register than agencies in a country with a more developed higher education sector. For some agencies, registration confirms the quality of the agency; confers status on the agency and can help to consolidate the country and its higher education sector in Europe.

8.25 It is perhaps in this area more than any other that the tension between the accountability function of the register and the developmental intention of the ESGs (see paragraph 6.4) is most apparent. Indeed, an implicit, and sometimes explicit, theme underpinning a number of the Review Panel's discussions with participants was whether the Register was a force for uniformity and conformity or competition and diversity. Part of the strategic review referred to in paragraphs 8.4 and 8.5 could with benefit include consideration of this issue.

Mutual trust between quality assurance agencies

8.26 There was evidence both in EQAR's SER and in the comments of those who met the Review Panel of confidence and trust in the integrity and independence of EQAR and of its procedures. Whether this has resulted in, or promoted mutual trust between agencies is too early to judge.

The student experience

8.27 A point made on a number of occasions during the Review Panel's meetings and reflected in this report, is the remoteness of EQAR and its activities from the lecture room or laboratory. It is for consideration whether the views of academic staff are appropriately or adequately represented in EQAR's deliberations. The interests of institutional heads are, to some extent, reflected in the EUA and EURASHE, both of which are, of course, members of the E4 Group. What priority these organisations give to the quality of the student learning experience and whether this is adequately reflected in the registration process is open to question. This may, of course, change as student funding arrangements change in Europe. Given these concerns, it is recommended that consideration be given to finding a way to give academics as a collectivity a voice in EQAR, which would help to embed quality assurance and the Register more firmly in institutions.

Term of Reference Three: What improvements are desirable? How might the organisation develop and act further with a view to best achieving its missions and objectives?

Introduction

8.28 A number of recommendations are already contained in this report, in particular affecting organisational structures and operational arrangements. Action in two other areas would, in the view of the Review Panel, have a major influence on the effectiveness of EQAR and its impact. The first concerns the relationship between EQAR and ENQA; the second, and related area

of activity, involves the promotion of EQAR with governments. These are considered below.

EQAR and ENQA

8.29 In the view of the Review Panel, there remains an unresolved tension between EQAR and ENQA. The most obvious manifestations of this tension are: the use of the ESGs by both organisations, but for fundamentally different purposes; the awkwardness of the requirement to demonstrate 'substantial compliance' with the ESGs; the potential for different interpretations of this phrase by the two organisations; and the difficulty on the part of some ENQA members that have chosen not to apply for EQAR registration to see what value is added by being on the Register. Each of these aspects of the relationship between EQAR and ENQA was apparent in EQAR's own SER and in the Panel's discussions with participants.

8.30 ENQA's commitment to the establishment of a register is not in doubt. Its publication, Standards and Guidelines for Quality Assurance in the European Higher Education Area, published in 2005, committed ENQA and its partners in the E4 Group to developing a European register as a '... light, non-bureaucratic construction ... nominated by EURASHE, ESIB (now ESU), EUA and ENQA ...'. Whether the independent Register that has actually emerged is what ENQA envisaged is questionable.

8.31 It is clear from EQAR's SER that it sees the relationship between itself and ENQA as critical to the future. This is reflected in its proposal, for example, '... to explain more clearly the consequences of the differences in purpose and functions between EQAR and ENQA ...'. The Review Panel would endorse this proposal and recommends that EQAR should engage in dialogue with ENQA on a range of matters with a view to clarifying and making public:

/ the differences in function and purpose of the two organisations;

/ their respective interpretations of the phrase ‘... substantial compliance ...’ with the ESGs; and

/ their respective criteria for establishing organisational eligibility for registration and membership respectively.

Profile

8.32 Appendix 8c lists those actions which EQAR believes it should take to enhance the use of the Register and achieve greater impact. In general, the actions proposed are supported by the Review Panel although it is the view of the Panel that there is little evidence of demand at this stage for a ‘... special seal, label or stamp ...’, one of EQAR’s proposals for action.

8.33 In addition, in the view of the Review Panel, the proposal to promote the Register outside the European Higher Education Area is premature until a greater proportion of European agencies are on the Register. This latter prospect would be much more likely to be realised if more governments were to make registration by EQAR a requirement for their national quality assurance agencies than is presently the case.

8.34 The Review Panel is, however, convinced of the need for EQAR to promote the benefits of the Register both in its own right and as part of a drive to encourage governments to consider making the registration of their national quality assurance agencies compulsory. With this in mind, it is recommended that EQAR should be more pro-active in promoting its existence and the benefits of being on the Register. This could include encouraging the E4 Group to be more proactive in promoting the existence of EQAR and the benefits of registration.

8.35 In support of these initiatives, the Review Panel also recommends that the General Assembly should appoint a high profile, independent President capable of raising the visibility and promoting the benefits of EQAR with key stakeholders. Such an appointment should be for a period of up to four years in the first instance.

9. Summary

9.1 Much has undoubtedly been achieved by EQAR in the first two years of its existence, despite the small size of its Secretariat and its relatively modest funding. The number of agencies now on the Register is testament both to the amount of work undertaken by staff and voluntary representatives of EQAR since its establishment and to the reputation that it has established as a credible and valuable organisation.

9.2 This report makes a number of recommendations for EQAR’s consideration as it looks to the future. They include recommendations intended to ensure that, as soon as possible, those remaining agencies eligible for registration apply for the Register.

9.3 In the view of the Review Panel, however, the greatest need is for time and resources now to be devoted by EQAR to considering its strategic role in the development of higher education in Europe. This is separate from, but builds on its current regulatory role. This has implications for: its relationships with other organisations, in particular, ENQA; the criteria and procedures used to determine those admitted to the Register; and the nature and scale of the financial and human resources required to take on this more strategic role.

9.4 The rationale for the regulatory role performed by EQAR remains. In the view of the Review Panel, the next stage in EQAR’s development should reflect a more strategic role within higher education in Europe.

26 August 2011

Notes

1. The EQAR Steering Group for the external evaluation of EQAR was comprised of:

- / Judith Eaton, president of CHEA (Chair)
- / Jan Schreiner Levy, Norwegian Ministry of Higher Education
- / Norman Sharp, former director of QAA Scotland
- / Martina Vukasovic, Centre for Education Policy

2. The E4 Group is comprised of:

- / the European Association for Quality Assurance in Higher Education [ENQA];
- / the European Students' Union [ESU];
- / the European University Association [EUA]; and
- / the European Association of Institutions in Higher Education [EURASHE]

3. The Bologna Process, named after the city of Bologna where, in 1999, 29 countries signed a declaration marking the beginning of the reform process intended to allow Europe's diverse education systems to articulate better with each other, ultimately aiming at establishing a European Higher Education Area. Currently this process involves 47 signatory countries to the Council of Europe's European Cultural Convention.

4. The BFUG, as defined in the Communiqué of the Conference of European Ministers Responsible for Higher Education, signed in Berlin on 19 September 2003.

5. Europe refers to the 47 countries participating in the Bologna Process, i.e. all Member States of the Council of Europe, except Belarus, and in addition Kazakhstan and the Holy See who are signatories of the Cultural Convention but not members of the Council of Europe.

//// STRATEGIC PRIORITIES AND FOLLOW-UP OF THE EXTERNAL EVALUATION OF EQAR

FEBRUARY 2012³

The European Quality Assurance Register for Higher Education (EQAR) welcomes the Report of the Expert Panel Appointed to Review EQAR and thanks the Panel for its valuable reflections and suggestions.

EQAR also thanks the Steering Group working under the auspices of the Council for Higher Education Accreditation (CHEA) for coordinating this evaluation.

/// Developing the Role of EQAR

EQAR concurs with the Panel's general recommendation that EQAR should develop further from its focus on establishing robust procedures, during its initial developmental phase, towards developing, implementing and realising a strategy, with a view to realising the goals and objectives for EQAR defined at the outset.

In doing so, EQAR is guided by the following principles:

/ EQAR's role is determined by and based on its mission, objectives and unique membership structure, including both stakeholder organisations and governments.

/ EQAR's role as a register of quality assurance agencies is unique and not intended to duplicate other organisations' mission or activities. With its specific objectives the Register contributes to the wider goals of improving the quality of higher education, trust and recognition based on internationally recognised, transparent and robust quality assurance procedures within the European Higher Education Area (EHEA).

/ EQAR's activities relate to its role as a register and the objectives agreed at the outset, rather than turning into a generic policy-making organisation dealing with a broad range of education-related issues. EQAR's unique broad ownership by stakeholders and governments is based on its role as a register and the objectives related to that.

/ EQAR's "regulatory role" and "strategic role" are thus not separate, but two sides of the same coin, both of them being assumed under the same mission and objectives.

EQAR needs the active support and commitment of its members and particularly of EHEA governments in order to be able to further develop and realise its mission and international role.

/// EQAR and the European External Quality Assurance Landscape

During the first years of its existence EQAR has established its position as a reliable register of quality assurance agencies operating in Europe in substantial compliance with the European Standards and Guidelines (ESG). The Panel noted that the "number of agencies now on the Register is testament both to the amount of work undertaken [...] and to the reputation that [EQAR] has established as a credible and valuable organisation." The survey of quality assurance agencies conducted as part of the EQAR self-evaluation process showed that the most relevant rationale for agencies to be on the Register is to improve international reputation. The second most prominent reason is to improve recognition of qualifications or institutions that agencies have evaluated, accredited or audited.

The European Higher Education Area (EHEA) is constructed on the basis of common European principles and on the growing internationalisation of higher education. In developing and pursuing their own profiles and missions higher education institutions welcome the opportunity for evaluation, accreditation or audit incorporating their diverse activities and with an international added value.

In recent years, there has been a growth in international quality assurance activities, cross-border reviews and European external quality assurance-related initiatives, both of a generic nature or discipline-specific. One example is the growing number of quality labels. Another is that some national quality assurance agencies are operating internationally and offering reviews to institutions from other countries.

Since 2005 the ESG have codified the principles of a common European approach to quality assurance. More recently the establishment of EQAR has created the necessary preconditions for

international recognition by serving as authoritative European reference point for quality assurance agencies working in substantial compliance with the ESG.

EQAR is open to national and non-national agencies alike, from Europe as well as from other parts of the world. All agencies that have had their compliance with the ESG reviewed can apply for inclusion on the Register and will be judged according to the standards and guidelines set out in the ESG.

Whether or not quality assurance decisions and results are recognised within a certain national jurisdiction depends on the commitment of governments and other actors to the European QA infrastructure as well as the principle of recognition of registered agencies.

As of January 2012, in seven European countries (Austria, Bulgaria, Denmark, Germany, Lithuania, Poland and Romania) EQAR-registered quality assurance agencies enjoy official recognition of one sort or another. This reflects trust in the Register and considerable progress in the short period since EQAR was established, bearing in mind that legislative processes often take substantial time.

These examples represent a trend towards widespread international recognition of registered agencies or their decisions, which might be more direct and adapted to the principles of the EHEA than recognition of quality assurance agencies or decisions based on numerous bilateral agreements or complex multilateral agreements. The key prerequisite for this trend is trust, both in EQAR itself as well as in evaluation, audit and accreditation by EQAR-registered agencies being robust and meaningful. The ESG constitute the basis for such trust, and this need for trust will be one important principle for the future development of the ESG.

EQAR is a key actor using the European Standards and Guidelines (ESG). In turn, the ESG are the fundament for EQAR's work. The Register Committee has acquired considerable experience in using the ESG as criteria for the Register, a purpose distinctly different from that of any other users of the ESG. First reflections on the basis of this experience were set out in the EQAR Input to the MAP-ESG Project of August 2011.

/// Response to the Panel's Specific Recommendations

In the following, EQAR responds to the External Evaluation Panel's specific recommendations (see section 8, pages 7 – 13, and appendix 6) and sets out its planned actions or further considerations.

Governance

i. The General Assembly should add strategic planning to its current list of functions. [Para 8.5].

The panel made this recommendation in the light of its general comment as to the need to enhance the strategic focus of EQAR. It also specified that "day-to-day responsibility for this activity should be delegated to the Executive Board".

Response:

EQAR agrees with the recommendation. It considers that the General Assembly (GA) should have responsibility for adopting strategic goals and priorities, thus exercising strategic planning at the highest level. The Executive Board should be responsible for implementing and operationalising the decisions of the GA. Thus, the Executive Board should be in charge of strategic management on a day-to-day basis, in consultation with the Register Committee and supported by the Secretariat. The Executive Board should propose amendments to the EQAR Statutes in order to reflect these responsibilities, if necessary.

EQAR further considers that there is a need for an ongoing discussion on strategic goals and priorities within all EQAR statutory bodies, taking account of their specific roles and feeding into a strategic plan presented to the GA. A second "Members' Dialogue" for EQAR members and committees will serve as an opportunity to discuss EQAR's strategy and form the basis for preparing a strategic plan. The future strategic plan should serve as a reference point for the work of all bodies.

Proposal:

- a. develop a strategic plan, coordinated by the Executive Board
- b. investigate the need for statutory changes

Indicative timing:

- a. Members' Dialogue in the autumn of 2012, final consideration at the GA in 2013
- b. until the GA in 2013

ii. EQAR should promote with the organisations nominating representatives to the General Assembly the benefits to EQAR of ensuring, as far as possible, that those representing them remain on the Assembly for three years renewable for a further three years [Para 8.6].

Response:

EQAR agrees that members should be encouraged to ensure continuity of their General Assembly representatives as much as possible.

Since they serve as representatives of governments or stakeholder organisations, rather than in their personal capacity, it is in the members' autonomy to decide on their General Assembly (GA) representative(s) as they see fit, and there cannot be a fixed length of mandate or rules for how long an individual might represent a member.

Proposal:

no formal changes, but discussion within the GA

iii. Members of the Executive Board should serve an initial mandate of at least three years (currently two years) renewable for up to two times (currently three times) [Para 8.7]

iv. Members of the Register Committee should serve an initial mandate of at least three years (currently two years) renewable for up to two times (currently three times) [Para 8.8]

Response:

EQAR agrees that longer mandates of the Executive Board and Register Committee could be helpful in improving continuity.

When EQAR was established its founders (informally) agreed that committee members should ideally serve for at least four years and that the two nominees of one organisation should normally not be change at the same time. Committee members can serve for up to eight years in total.

The two-year mandates were put in place being mindful of the fact that not all organisations can nominate individuals for a term of four years. It was agreed to avoid different arrangements for different organisations.

Therefore, EQAR will communicate more clearly to the nominating organisations that it would be beneficial if new committee members served for at least four years (two mandates). EQAR will not change the official lengths of mandates for the time being.

Proposal:

no formal changes for the time being

Criteria for the Register

v. EQAR should clarify its current criteria for establishing prima facie organisational eligibility to apply for registration [Para 8.12]

In conjunction with this recommendation the panel also noted that “where an applicant failed to meet what might be regarded as ‘technical’ criteria, for example, by submitting an evaluation report produced by a review panel that did not include a student member, the introduction of some form of pre-application scrutiny or advice could result in an application being deferred rather than proceeding to application and inevitable rejection” [Para 8.11]. It was pointed out that the recommendation is intended to “avoid unnecessary expenditure of time and reduce confusion and misunderstanding” [Para 8.12].

Response:

EQAR agrees with the recommendation. The Register Committee will consider this matter within a review of the Procedures for Applications. This should introduce a clear specification of organisational eligibility for inclusion on the Register, requirements for external reviews and a procedure to verify eligibility before an external review of the potential applicant and the application process proper.

Proposal:

revision of Procedures for Applications by the Register Committee in consultation with the GA

Indicative timing:

draft revised Procedures for Applications by mid-2012

vi EQAR should enhance the transparency of its decision-making by:

/ making public the names of each applicant which satisfies organisational eligibility criteria; and

/ making public the Register Committee’s decision on each application [Para 8.14]

The panel confirmed EQAR’s self-analysis that its policy of confidentiality, though initially justified, has now more negative than positive consequences. The panel pointed out “that the procedures now in place are sufficiently robust and the credibility of EQAR sufficiently well established for its initial concern for confidentiality no longer to be justified” [idem].

Response:

EQAR agrees with the Panel's recommendation, which follows up the corresponding issue identified in the self-evaluation report.

This recommendation will also need to be implemented within a revision of the Procedures for Applications (see above), on which the current policy of confidentiality is based. This revision will clarify the form and level of detail for decisions made public.

At the Members' Dialogue in the autumn of 2012 (see i.) members will be invited to discuss the draft revised Procedures for Applications.

Proposal:

revision of Procedures for Applications by the Register Committee in consultation with the GA (at Members' Dialogue)

Indicative timing:

draft revised Procedures for Applications by mid-2012, discussion at the Members' Dialogue (autumn)

vii. Observers should no longer be appointed to the Register Committee [Para 8.15]

The panel made reference to the Register Committee's accountability to the General Assembly as well as the appeals system. The panel pointed out that, in its view, "observers may have made sense when the registration process was being established and tested", but that "if the recommendations in paragraph 8.14, supporting greater transparency in its procedures, and in paragraph 8.31 clarifying EQAR's relationship with ENQA, [were] accepted and implemented" observers were no longer necessary.

Response:

Within the Register Committee as well as in the Members' Dialogue discussions there was broad agreement that the observers have served to strengthen accountability to governments and to increase trust in the Register Committee's procedures. EQAR therefore considers that the five governmental observers should remain on the Register Committee for the time being.

There was some discussion around the fact that currently the BFUG elects observers rather than the EQAR General Assembly. When these arrangements were agreed the

role and composition of the GA were not yet defined. It, however, now appears unusual that governments can be observers while not being Governmental Member. Governments with an interest in EQAR's workings should be expected to become Governmental Members. Moreover, the governmental observers should strengthen accountability of the Register Committee's work first and foremost towards the fellow governmental and other members of EQAR.

Therefore, observers should be chosen from amongst the Governmental Members of EQAR by the EQAR General Assembly in the future.

EQAR will continue and enhance its regular communication to the BFUG. At the same time, Governmental Members should benefit from more detailed reporting.

The principle question whether or not there is a need for governmental observers should be reconsidered within the next EQAR self evaluation, once the measures for enhancing transparency of decision-making (recommendations v. and vi.) have been implemented.

Proposal:

- a. change of nomination procedure by the GA, based on Executive Board proposal
- b. review principle question at a later point in time

Indicative timing:

- a. as of the 2014/16 Register Committee mandate
- b. within next EQAR self-evaluation

viii. Each element of EQAR [see para 7.3] should evaluate formally its effectiveness on a regular basis [Para 8.16]

Response: EQAR agrees with this recommendation. Such a regular formal evaluation should take place by the different bodies/committees in a coordinated manner and feed into a regular self-evaluation process of EQAR as a whole and the establishment of an internal QA system of EQAR itself. In particular, EQAR's strategic plan should be reviewed on the basis of each self-evaluation.

Proposal:

regular self-evaluation of EQAR coordinated by the Executive Board and a Self-Evaluation Group

Indicative timing:

next self-evaluation report presented to the 2016 GA and leading to a review of strategic plan in 2017

ix. Consideration should be given to finding a way to give academics as a collectivity a voice in EQAR, which would help to embed quality assurance and the Register more firmly in institutions [Para 8.27]

The panel noted the "remoteness of EQAR and its activities from the lecture room or laboratory" and questioned "whether the views of academic staff are appropriately or adequately represented in EQAR's deliberations". The panel further raised the question whether "the student learning experience" was "adequately reflected in the registration process".

Response:

EQAR acknowledges (a) the need to demonstrate a clear link between its own work and (a better) "student learning experience", i.e. the actual teaching and learning processes on the ground. EQAR, however, considers this separate from (b) the specific question of representation of academic staff in EQAR's deliberations.

a) EQAR works within the framework of its agreed mission, objectives and functions. Thus, the link between EQAR's work and the "student learning experience" is indirect and limited.

EQAR's direct influence extends to scrutinising the work of quality assurance agencies. This is done based upon the findings of an independent external review of an agency which is currently not conducted by EQAR itself. Quality assurance agencies, in turn, influence teaching and learning, sometimes directly (e.g. in the case of programme-level QA) or more indirectly (e.g. via institutional quality assurance mechanisms in the case of institutional audits). The quality of the teaching and learning process is the central competence and responsibility of each higher education institution and its internal QA system.

Operating at meta-level, EQAR's responsibility is to ensure that procedures and criteria for inclusion on the Register are relevant for and seek to improve the "student learning experience". An increase in cross-border QA so that institutions can choose an agency to work with will have an influence on teaching and learning processes. By promoting internationally recognised, transparent and robust QA procedures EQAR also contributes to promoting a quality culture shared by all stakeholders in the EHEA.

Within the next self-evaluation EQAR will analyse further the "chain" from its criteria and procedures all the way down to the teaching and learning process on the ground. At the same time, this "chain" is an important aspect in relation to the revision of the ESG.

b) In terms of the representation of the views of academics in EQAR bodies it should be noted that in addition to EUA and EURASHE, who were mentioned by the panel, Education

International, an organisation representing, inter alia, academic staff, is a member of EQAR and nominates one member to the Register Committee. Experience has also shown that 50% of all Committee members nominated thus far are active academic staff.

EQAR will review within its next self evaluation whether the voice of academics is appropriately reflected in EQAR's current arrangements, both formally as well as effectively, and consider improvements if necessary.

Proposal:

- a. focus the communication strategy (part of the future strategic plan) on making clear EQAR's indirect link to and impact on teaching and learning on the ground, determined by its mission and procedures, as well as the ESG
- b. analyse further the indirect link and impact, and how well they have been communicated
- c. review the formal as well as effective voice of academics in EQAR

Indicative timing:

- a. strategic plan until 2013 (see i.), but also continuously as a general principle, particular attention in contributing to ESG revision
- b/c. next EQAR self-evaluation

EQAR and ENQA

x. EQAR should engage in dialogue with ENQA on a range of matters with a view to clarifying and making public:

/ the differences in function and purpose of the two organisations;

/ their respective interpretations of the phrase '... substantial compliance ...' with the ESGs; and

/ their respective criteria for establishing organisational eligibility for registration and membership respectively [Para 8.31]

The panel primarily saw need for clarification arising from "the use of the ESGs by both organisations, but for fundamentally different purposes; the awkwardness of the requirement to demonstrate 'substantial compliance' with the ESGs; the potential for different interpretations of this phrase by the two organisations; and the difficulty on the

part of some ENQA members that have chosen not to apply for EQAR registration to see what value is added by being on the Register."

Response:

EQAR is glad to intensify its continuous dialogue with ENQA. In addition, it will be important for EQAR in its own communication to present clearly its function, purpose and resulting criteria and procedures, in its own right, thus, on making its mission and *raison d'être* as clear and explicit as possible.

a. EQAR and ENQA share a mutual understanding of their respective function and purpose. Thus, there is primarily a need to promote this common understanding. EQAR considers this as a transversal principle for its communication and will invite ENQA to discuss aligning each other's communication better.

b. Given that ENQA and EQAR both use the ESG, but, as the panel noted, "for fundamentally different purposes", it is possible that the two organisations might conclude differently on what is "substantial compliance" with the ESG.

EQAR will continue to make public its understanding of substantial compliance within the regular reports by the Register Committee and consider to what extent it would be helpful to define "substantial compliance" further in

EQAR's Procedures for Applications. This will naturally also be linked to and depend on the future development of the ESG.

EQAR will invite ENQA to discuss each other's use and interpretation of the ESG, for their respective purposes, and how to best communicate differences where they exist.

c. EQAR will clarify its requirements for organisational eligibility as part of a revision of the Procedures for Applications (see recommendation v.) in the context of its own mission and function. EQAR will invite ENQA to discuss each other's requirements for organisational eligibility and the reasons for possible differences.

Proposal:

a/b/c. invite ENQA to discuss the specific issues mentioned

a. all parts of EQAR to communicate clearly the functions and purposes

b/c. Register Committee to consider the points raised in its future reports and the revision of the Procedures for Applications

Indicative timing: **a/b/c** – during the first half of 2012

a – continuous

b/c – next Register Committee report in March 2012, draft revised Procedures by mid-2012

Profile

xi. EQAR should be more pro-active in promoting its existence and the benefits of being on the Register. This could include encouraging the E4 Group to be more proactive in promoting the existence of EQAR and the benefits of registration [Para 8.34].

Response:

EQAR agrees with the recommendation and will focus its activities further on promoting its work and encouraging the E4 organisations to do similarly; monitoring, analysing and promoting how the Register is used at different levels; and informing eligible organisations about the possibility to seek inclusion on the Register.

EQAR notes that in addition to the E4 Group also BUSINESSEUROPE, Education International and the Governmental Members of EQAR have committed to supporting the objectives of EQAR and should thus be actively involved in promotional efforts.

EQAR will set out specific measures in its annual Plans of Work as well as a future strategic plan (see recommendation i.).

Proposal:

a. measures to be set out in the Plan of Work based on the strategic priorities

b. measures to be incorporated in strategic plan

Indicative timing:

a. Plan of Work 2012 presented to March GA

b. presented to the GA in 2013

xii The General Assembly should appoint a high profile, independent President capable of raising the visibility and promoting the benefits of EQAR with key stakeholders. Such an appointment should be for a period of up to four years in the first instance [Para 8.35].

Response:

EQAR welcomes the principle to reflect the need for visibility and promotion of EQAR in its organisational structure.

Establishing such a position would be a major organisational change. It would require clarifying the internal role and responsibilities, as well as a more elaborate profile. An external representative function without being clearly involved in and linked to the organisational structure is not considered beneficial. If a President were introduced s/he should preside over both the GA and the Executive Board, thus replacing the current rotating presidency by the E4 Group.

The establishment of such a position would thus impact on the functioning and management of the GA, the Executive Board as well as the Register Committee. The implementation of this recommendation should therefore be considered further with a view to how to make such a position most beneficial both for external visibility as well as for the functioning of the different bodies of EQAR.

Meanwhile, EQAR seeks to strengthen its existing organisational structure (Executive Board, Register Committee, Secretariat) in carrying out their roles and increasing the visibility of EQAR.

Proposal:

consider the recommendation further in the context of improving the visibility and functioning of EQAR

Indicative timing:

proposals within the next EQAR self evaluation

/// Strategic Priorities for EQAR

EQAR members propose as a general vision for the European Higher Education Area (EHEA) that all external quality assurance procedures carried out by EQAR-registered agencies are trusted and internationally recognised across the different EHEA states. EQAR members agree on two strategic priorities, which should be the starting point for developing a strategic plan and which should guide EQAR's future activities during the coming years.

Priority 1: International Trust and Recognition

Objective:

Promoting, through the Register, international trust and recognition of registered quality assurance agencies, their results and decisions throughout the EHEA.

There are various dimensions to recognition and this priority includes encouraging governments and competent authorities to:

/ recognise qualifications and higher education institutions evaluated, accredited or audited by registered agencies, including:

/ recognise quality assurance decisions and results regarding transnational education provision;

/ recognise quality assurance decisions and results on joint programmes;

/ allow higher education institutions to work with all registered agencies, taking into account the respective national requirements.

Specific aims:

/ promote the advantages of recognition of registered quality assurance agencies for institutions, governments, agencies, students and academics, using the existing examples of countries officially recognising registered agencies;

/ engage in the revision of the ESG with a view to ensuring that they are a good basis for EQAR's work;

/ analyse in greater detail the existing examples, ongoing debates and different views on agency recognition questions.*

Priority 2: Transparency and Information

Objective:

Increasing transparency of EQAR's work and ensuring that information provided by EQAR is meaningful to its users.

As a basis for the recognition of EQAR-registered agencies, trust and confidence in EQAR's procedures and decisions are of

the utmost importance, primarily by governments and quality assurance agencies, but also by the wider higher education community.

Thus, it is crucial that EQAR makes transparent its procedures and decision-making, opening it to broad scrutiny and demonstrating that EQAR operates in a professional and credible manner.

In order to ensure that EQAR is meaningful to the higher education community it is central that EQAR provides valuable and useful information about the registered agencies and their work.

Specific aims:

/ demonstrate EQAR's accountability to governments, stakeholders and the public;

/ enhance transparency of eligibility requirements, criteria and decision-making, including publication of decisions;

/ increase trust in EQAR's effective scrutiny of applicants and registered agencies;

/ ensure that EQAR publishes meaningful information about quality assurance systems, the registered agencies and their work for its different users.*

EQAR members note that those specific aims marked with* require considerable additional resources; activities contributing to these aims could not be implemented within EQAR's current, limited financial and human resources.

/// Conclusion

Strategic Priorities

EQAR agrees with the Panel's overarching recommendation to strengthen the strategic role of EQAR with a view to realising the wider goals and objectives for the Register defined in the ministerial mandate and the EQAR Mission Statement. EQAR will thus develop a strategic plan within the next year.

EQAR was established to further the development of the European Higher Education Area (EHEA) and, along with other organisations, to contribute to improving the quality of higher education in Europe.

EQAR's particular mission is to manage a register of quality assurance agencies that demonstrate substantial compliance with the European Standards and Guidelines (ESG). The Register allows stakeholders to identify quality assurance agencies that operate in line with agreed European principles, thus promoting the further development of a coherent and flexible external quality assurance system for Europe as a whole.

In order to fulfil this mission EQAR members agree on two strategic priorities for EQAR's work and as a basis for EQAR's future strategic plan:

/ Promoting, through the Register, international trust and recognition of quality assurance agencies

/ Increasing transparency and ensuring that information provided by EQAR is meaningful

Commitment of EHEA Governments

EQAR requires the active support and commitment of EHEA governments in order to develop and implement these strategic

priorities, in particular as regards the acceptance and recognition of registered agencies.

EQAR's remit is to manage and promote the Register of quality assurance agencies complying substantially with the ESG. Legislation on higher education and quality assurance, however, is in the remit of national (or regional) governments and it thus requires commitment at national or regional levels to achieve recognition of registered quality assurance agencies throughout the EHEA.

Resources

Realising the two strategic priorities will require activities that cannot be implemented within EQAR's current, limited resources. Their realisation includes, for instance, detailed analyses of national legislation and recognition of EQAR-registered agencies, leading to a comprehensive report, additional communication measures, or including more elaborate information on (inter)national QA systems, registered agencies and their work. Such activities require additional financial and human resources. EQAR will thus seek to both differentiate its income streams by exploring third-party sources of funding and increasing membership revenue.

European Standards and Guidelines (ESG)

Members consider it crucial that the EQAR perspective, based on the Register Committee experience, feeds substantially into the upcoming revision of the ESG.

The Register Committee works with the ESG for a unique purpose and from the perspective of EQAR's specific mission and objectives, distinct from those of other organisations. In the deliberations on the ESG revision, EQAR will have to ensure that the future revised ESG are fit for purpose as criteria for the Register.

/// Recommendations to Ministers

EQAR recommends that ministers take note of the strategic priorities defined by EQAR and commit to furthering recognition of registered agencies in the EHEA countries.

EQAR encourages all EHEA states that are currently not Governmental Members of EQAR to consider membership. In the long term, all EHEA states should be members of EQAR in order to ensure broadest possible ownership and support of the Register. EQAR proposes the following text for the Bucharest Communiqué:

/ Ministers welcome the Report of the Expert Panel appointed to review the European Quality Assurance Register for Higher Education (EQAR) and note that the evaluation evidenced that EQAR's organisational structures and processes are fit for purpose, effective and efficient, and enjoy trust and confidence.

/ Ministers take note of the strategic priorities and follow-up of recommendations agreed by EQAR.

/ Ministers commit to further recognising EQAR-registered quality assurance agencies that, within the framework of national requirements, should be able to undertake activities throughout the EHEA. In particular, ministers commit to recognise quality assurance results and decisions of EQAR-registered agencies on joint and double degree programmes.

/ Ministers invite EQAR to report back to the next ministerial conference on the implementation of the external evaluation recommendations and progress made regarding the recognition of EQAR-registered agencies.

1. Mission and Values

EQAR's mission is to further the development of the European Higher Education Area by increasing transparency of quality assurance, and thus enhancing trust and confidence in European higher education.

EQAR seeks to provide clear reliable information on quality assurance provision in Europe, thus improving trust among agencies.

EQAR seeks to facilitate the mutual acceptance of quality assurance decisions and to improve trust among higher education institutions, thus promoting mobility and recognition.

EQAR seeks to reduce opportunities for "accreditation mills" to gain credibility in Europe, thus further enhancing the confidence of students, institutions, the labour market and society more generally in the quality of higher education provision in Europe.

To achieve its mission EQAR manages a register of quality assurance agencies operating in Europe that substantially comply with the European Standards and Guidelines for Quality Assurance (ESG).

EQAR recognises the diversity of approaches to external quality assurance and is therefore open to all agencies, whether operating at programme or institutional level, whether providing accreditation, evaluation or audit services.

EQAR is committed to the principle on which the ESG are based: external quality assurance should recognise the central responsibility of higher education institutions for quality development and should be carried out by independent quality assurance agencies in a transparent, objective and responsible manner, involving their stakeholders and leading to substantiated results based on well-defined procedures and criteria.

EQAR acts independently from other organisations and is committed to taking proportionate, consistent, fair and objective decisions.

EQAR will make transparent its mode of operation and its procedures while ensuring

necessary confidentiality. EQAR is committed to continuously improving the quality of its work. (adopted by the EQAR General Assembly on 25 June 2008 in Sarajevo).

2. Overview of EQAR's Structure

The European Quality Assurance Register for Higher Education (EQAR) was founded in March 2008 to promote transparency, trust and international recognition in quality assurance of higher education. EQAR maintains a register of quality assurance agencies that have proven to comply substantially with the European Standards and Guidelines for Quality Assurance (ESG).

The founding of EQAR as an independent international non-profit association in March 2008 concluded a long phase of conceptual and preparatory work by the E4 Group, consisting of ENQA, ESU, EUA and EURASHE.

The E4 Group drew up an operational model for a European register of quality assurance agencies in higher education in the run-up to the Bologna Process follow-up conference held in May 2007 in London. There, the ministers responsible for higher education in the 46 Bologna Process countries mandated the E4 organisations to set up a European register of quality assurance agencies.

EQAR's structure is based on the premise that the key stakeholders in higher education jointly bear the main responsibility to manage EQAR and to ensure its operation, as reflected in the mandate given to the E4 Group by ministers. At the same time, the structure recognises that European governments bear the responsibility for Europe's higher education systems as a whole and thus need, to be involved in order to enhance overall accountability.

Thus, the structure features differentiated roles for governments and stakeholders, and several checks and balances (see Figure 1). European governments can become involved in the governance of the EQAR association as Governmental Members.

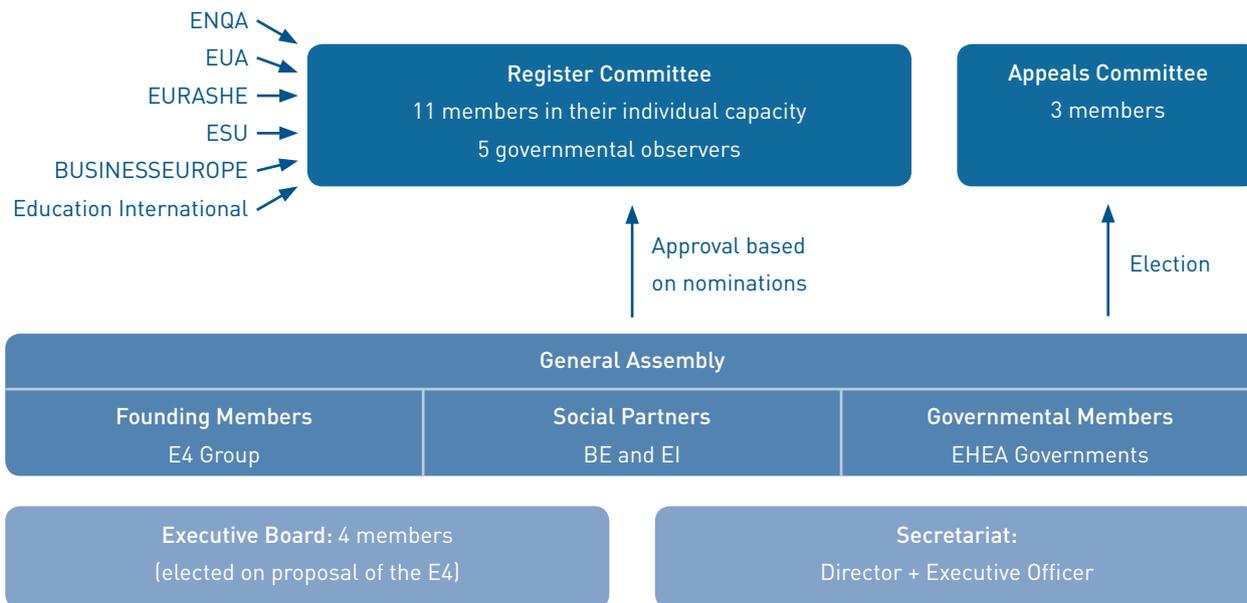


Figure 1: Structure of EQAR aisbl/ivzw

The **General Assembly (GA)**, comprised of all members, is the supreme decision-making body of EQAR. It decides on the budget, approves the account, elects the Executive Board and Appeals Committee, approves the Register Committee and discusses any matters of major importance for the Association as a whole.

The European Commission, the Bologna Secretariat, the Council of Europe and UNESCO-CEPES participate in its meetings as observers.

The voting system of the General Assembly ensures that most decisions require a majority of both the Governmental Members and the Non-Governmental Members (i.e., Founding and Social Partner Members).

The **Executive Board (EB)** is in charge of the management of EQAR as an association, including administrative and financial matters and strategic coordination.

The Executive Board comprises of five members: one from each Founding Member and the Chair of the Register Committee as an ex officio member without voting rights.

The functions of President, two Vice-Presidents and Treasurer rotate annually amongst the Board's voting members.

The [Register Committee](#) has the exclusive responsibility to decide on applications for inclusion on the Register. It exercises this responsibility independently; its decisions do not require approval or ratification by another body.

The Register Committee comprises eleven members. Ten individuals with expertise in quality assurance are nominated ENQA, ESU, EUA, EURASHE (2 nominees each), BUSINESSEUROPE and Education International (1 nominee each). The chair is elected by the nominated members and co-opted onto the Register Committee as its eleventh member.

The Register Committee members serve as experts acting in their individual capacity, and not as representatives of the nominating organisations. Nominees may not currently hold a representative function or be a staff member of the nominating organisation.

Five governments, nominated by the Bologna Follow-Up Group (BFUG), participate in the Register Committee's meetings as observers.

Appeals against a decision of the Register Committee are considered by the [Appeals Committee](#), comprising of three members and three deputies elected by the General Assembly for a mandate of four years. They may not serve on any other body of EQAR.

The [Secretariat](#) is in charge of the daily management and operation of EQAR. It supports all other bodies in their work, ensures the information exchange between different bodies and serves as contact point for external enquiries.

3. Code of Conduct

The Code of Conduct is based on EQAR's values as defined in the Mission Statement:

/ EQAR recognises the diversity of approaches to external quality assurance and is therefore open to all agencies, whether operating at programme or institutional level, whether providing accreditation, evaluation or audit services.

/ EQAR is committed to the principle on which the ESG are based: external quality assurance should recognise the central responsibility of higher education institutions for quality development and should be carried out by independent quality assurance agencies in a transparent, objective and responsible manner, involving their stakeholders and leading to substantiated results based on well-defined procedures and criteria.

/ EQAR acts independently from other organisations and is committed to taking proportionate, consistent, fair and objective decisions.

/ EQAR will make transparent its mode of operation and its procedures while ensuring necessary confidentiality. EQAR is committed to continuously improving the quality of its work.

All members of EQAR committees and staff commit to:

- / ensuring integrity in their work at all times;
- / promoting EQAR's values;
- / acting in a manner that supports the perception of EQAR as an independent organisation working to high professional standards;
- / honouring confidentiality of internal documents and information;
- / disclosing to EQAR any functions, memberships, contracts or other relationships maintained with QAAs or their affiliates;

/ disclosing to EQAR any other circumstances that constitute or may be perceived as a conflict of interest.

Members of the Executive Board also commit to:

/ when speaking in public, ensuring clarity as to whether speaking on behalf of EQAR or their own organisation.

Members of the Register Committee also commit to:

/ in matters related to quality assurance of higher education, not representing or acting on behalf of an organisation that nominates members of the Register Committee.

/ when speaking in public otherwise, ensuring clarity as to whether speaking on behalf of EQAR or their own organisation.

/ not serving on panels reviewing QAAs where these reviews may potentially be used to support an EQAR application.

Members of staff also commit to:

/ not accepting any functions, memberships, contracts or other relationships with a QAA, EQAR member or other organisation that could jeopardise the independence of EQAR in any way.

Concerns

Any third party (organisations as well as individuals) may address a concern as to whether a representative has acted in accordance with this Code of Conduct to EQAR.

Such concerns should be referred to the President of the Executive Board or the Director of the Secretariat, as appropriate. A concern should clearly specify the individual concerned and the occasion that caused the concern.

For concerns regarding the work of a registered agency, please refer to the Complaints Policy. If you are an applicant and have a concern regarding the decision on your application, please address the EQAR Secretariat.

4. List of EQAR members as of 31/12/2011

Founding Members

/ ENQA, European Association for Quality Assurance in Higher Education

/ ESU, European Students' Union (formerly ESIB)

/ EUA, European University Association

/ EURASHE, European Association of Institutions in Higher Education

Social Partner Members

/ BUSINESSEUROPE

/ Education International

Governmental Members

/ Armenia

Ministry of Education and Science

/ Austria

Federal Ministry of Science and Research

/ Belgium (Flemish community)

Flemish Department of Education and Training

/ Belgium (French-speaking community)

Direction générale de l'Enseignement non obligatoire et de la Recherche scientifique

/ Bosnia and Herzegovina

Ministry of Civil Affairs

/ Bulgaria

Ministry of Education and Science

/ Croatia (joined in 2011)

Ministry of Science Education and Sports

/ Cyprus

Ministry of Education and Culture

/ Denmark

Danish University and Property Agency / Ministry of Science, Technology and Innovation

/ Estonia

Ministry of Education and Research

/ France

Ministry of Higher Education and Research

/ Georgia

Ministry of Education and Science

/ Germany

Federal Ministry of Education and Research / Standing wof the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany

/ Ireland

Department of Education and Science

/ Poland

Ministry of Science and Higher Education

/ Latvia (joined in 2011)

Ministry of Education and Science

/ Liechtenstein

Office of Education

/ Luxembourg

Ministry of Culture, Higher Education and Research

/ Malta

Ministry of Education, Employment and the Family

/ Montenegro (joined in 2011)

Ministry of Education and Sports

/ the Netherlands

Ministry of Education, Culture and Science

/ Norway

Ministry of Education and Research

/ Portugal

Ministry of Science, Technology and Higher Education

/ Romania

Ministry of Education, Research and Youth

/ Slovenia

Ministry of Higher Education, Research and Technology

/ Spain

Ministry of Education and Science

/ Switzerland

State Secretariat for Education and Research

/ Ukraine

Ministry of Education and Science

5. Composition of EQAR bodies

Register Committee

Chair:

/ Kjell Frønsdal (Bergen, Norway)

Judge of the Gulating Court of Appeal in Bergen, Norway

Vice-Chair:

/ Lucien Bollaert (Kortrijk, Belgium)

Member of the Executive Board, Accreditation Organisation of the Netherlands and Flanders (NVAO)

Members:

/ Christoph Anz (München, Germany)

Head of Education Policy Unit, BMW Group

/ Gertie De Fraeye (Ghent, Belgium)

Master student in law and student representative and vice-chair of the council for higher education in the Flemish Education Council

/ Henrik Toft Jensen (Roskilde, Denmark)

Former rector, Roskilde University

/ Dáire Keogh (Dublin, Ireland)

Vice-President, Irish Federation of University Teachers (IFUT)

/ Dorte Kristoffersen (Melbourne, Australia)

Commissioner, Tertiary Education Quality and Standards Agency (TEQSA)

/ Mindaugas Misiunas (Vilnius, Lithuania)

Director, Kauno kolegija (University of Applied Sciences), Vilnius College of Higher Education

/ Júlio Pedrosa (Avêiro, Portugal)

Senior Researcher, Ciceco – Centre for Research in Ceramics and Composite Materials

/ Mala Singh (Milton Keynes, United Kingdom)

Professor of International Higher Education Policy, Centre for Higher Education Research and Information, Open University

/ Tanel Sits (Tallinn, Estonia)

Educational Policy Officer, Federation of Estonian Student Unions (EÜL)

Observers:

/ Czech Republic

/ Denmark

/ Greece

/ Slovenia

/ Turkey

Executive Board

President:

/ Andrea Blättler (Lucerne, Switzerland)

Member of the Executive Committee of the European Students Union (ESU)

(since April 2011, before Treasurer)

Vice-Presidents:

/ Lesley Wilson (Brussels, Belgium)

Secretary General, European University Association (EUA)

/ Andreas Orphanides (Nicosia, Cyprus)

Vice-President, European Association of Institutions in Higher Education (EURASHE)

(since April 2011, before President)

/ Emmi Helle (Helsinki, Finland)

Secretary General, European Association for Quality Assurance in Higher Education (ENQA)

(until March 2011)

Treasurer:

/ Helka Kekäläinen (Helsinki, Finland)

Vice-President, European Association for Quality Assurance in Higher Education (ENQA)

(since April 2011)

Ex-officio:

/ Kjell Frønsdal (Bergen, Norway)

Chair of the EQAR Register Committee

Appeals Committee

Chair:

/ Jürgen Kohler (Greifswald, Germany)

Former Chair of the German Accreditation Council

Members:

/ Ossi V. Lindqvist (Kuopio, Finland)

Former chair of the Finnish Higher Education Evaluation Council (FINHEEC)

/ Stephan Neetens (Brussels, Belgium)

Adviser, Ministry of Pensions

Deputy chair:

/ Thierry Malan (Paris, France)

Former General Inspector, Inspectorate for Education and Research

Deputy members:

/ Geri Bonhof (Utrecht, the Netherlands)

President of the Executive Board, Hogeschool Utrecht – University of Applied Sciences

/ Inge Jonsson (Stockholm, Sweden)

Former Rector of Stockholm University
(until March 2011)

Secretariat

Director:

/ Colin Tück

Executive Officer:

/ Annelies Traas

6. Registered Quality Assurance Agencies

The following agencies were included on the register as of 31/12/2011. Agencies are included for five years counting from the date of their external review, the duration of inclusion is indicated in the table for each agency.

Further information on these agencies and the external review reports on which EQAR's decision are based can be obtained from:

<http://www.eqar.eu/register.html>

Name:	Included since:	Inclusion until:
ACQUIN – Accreditation, Certification and Quality Assurance Institute (Germany)	15/04/2009	31/01/2016
ACSUCYL – Quality Assurance Agency for the University System of Castilla y León (Spain)	18/11/2010	31/12/2014
ACSUG – Agency for Quality Assurance in the Galician University System (Spain)	18/11/2010	31/07/2014
AERES – Evaluation Agency for Research and Higher Education (France)	14/05/2011	31/05/2015
AGAE – Agency for Quality Assurance in Higher Education and Research of Andalucía (Spain)	7/10/2009	31/01/2014
AHPGS – Accreditation Agency for Study Programmes in Health and Social Sciences AHPGS (Germany)	7/10/2009	31/03/2014
ANECA – National Agency for Quality Assessment and Accreditation of Spain	5/12/2008	30/06/2012

Name:	Included since:	Inclusion until:
AQA – Austrian Agency for Quality Assurance	7/10/2009	30/11/2012
AQAS - Agency for Quality Assurance through Accreditation of Study Programmes (Germany)	25/05/2010	28/02/2012
AQU – Agency for Quality Assurance in the Catalan University System (Spain)	5/12/2008	31/08/2012
ARACIS – Romanian Agency for Quality Assurance in Higher Education	7/10/2009	31/03/2014
ASHE – Agency for Science and Higher Education (Croatia)	25/11/2011	31/08/2016
ASIIN – Akkreditierungsagentur für Studiengänge der Ingenieur-wissenschaften, der Informatik, der Mathematik und der Naturwissenschaften (Germany)	15/04/2009	29/02/2016
CTI - Engineering Degree Commission (France)	18/11/2010	30/04/2014
EVA – Danish Evaluation Institute	14/05/2011	31/03/2016
evalag - Evaluation Agency Baden-Württemberg (Germany)	25/05/2010	30/09/2014
IEP – EUA Institutional Evaluation Programme (Switzerland)	15/12/2011	30/04/2014
FIBAA – Foundation for International Business Administration Accreditation (Germany)	15/04/2009	29/02/2012
FINHEEC - Finnish Higher Education Evaluation Council (KKA)	18/11/2010	31/07/2015
IUQB – Irish Universities Quality Board	7/10/2009	30/09/2013

Name:	Included since:	Inclusion until:
NEAA – National Evaluation and Accreditation Agency (Bulgaria)	7/10/2009	31/07/2013
NVAO – Accreditation Organization of The Netherlands and Flanders	5/12/2008	30/09/2012
PKA – State Accreditation Commission (Poland)	15/04/2009	31/12/2013
QANU – Quality Assurance Netherlands Universities	14/05/2011	31/12/2015
The Accreditation Institution (Denmark)	18/11/2010	31/08/2015
VLHORA – Flemish Council of University Colleges (Belgium)	15/04/2009	31/10/2013
VLIR-QAU – Flemish Interuniversity Council, Quality Assurance Unit (Belgium)	7/10/2009	31/05/2014
ZEVA – Central Evaluation and Accreditation Agency (Germany)	15/04/2009	31/01/2016

7. Statement on the Modernisation Agenda

(22 June 2011, agreed by the Executive Board)

The European Quality Assurance Register for Higher Education (EQAR) was established as part of the Bologna Process and gathers 27 European governments as well as the key stakeholder organisations as members. EQAR welcomes the European Commission’s initiative to review the 2006 Communication “Delivering on the Modernisation Agenda for Universities”.

The Quality Assurance Contribution

Quality assurance is a key tool to help addressing some of the challenges higher education in Europe is facing:

- / Promoting mobility
- / Supporting diversity
- / Ensuring accountability

Effective quality assurance systems are an essential contribution to mutual trust between higher education institutions, quality assurance agencies and countries, and thus help to form a basis for smooth recognition of qualifications and periods of study, a main requirement for mobility.

Both internal and external quality assurance increasingly put the institutions’ own mission and profile at the centre of the quality assurance process, and aim to help institutions improve

in achieving their diverse missions, rather than to impose prescriptive standards.

At the same time, external quality assurance systems ensure accountability of higher education institutions to various stakeholders about the quality of their provision. In one way or another, external quality assurance often aims to answer the question: is the institution (or the study programme) living up to its promises, i.e. its own mission or the intended learning outcomes?

The European Infrastructure

At European level, the necessary infrastructure for quality assurance has been put in place during the past years.

The European Standards and Guidelines for Quality Assurance (ESG) have been a main driver for reform and development of institutional and national quality assurance systems. They have enriched the European Higher Education Area (EHEA) by a set of important shared principles for quality assurance.

The ESG have helped making different European systems more comparable. The use of learning outcomes in quality assurance is linked to student centred learning, a major reform of the concepts of study programmes within institutions.

The European Quality Assurance Register (EQAR) was established as a natural next step on the basis of the ESG. EQAR provides information on reliable and credible quality assurance agencies operating in Europe. The Register lists agencies that have evidenced their compliance with the common standards enshrined in the ESG.

EQAR offers a reliable information source, preventing dubious organisations (accreditation mills) from gaining credibility and allowing national governments to recognise in their jurisdiction the results or decisions of foreign quality assurance agencies.

In supporting various other instruments developed within the Bologna Process and other European processes – most notably the ECTS, the Qualifications Framework for the EHEA and European Qualification Framework for Lifelong Learning (EQF-LLL) – quality assurance makes a contribution to better articulation and recognition of qualifications throughout Europe, thereby facilitating mobility of students and graduates.

The Need for Commitment

The new Communication should encourage Member States to make full use of the existing European quality assurance instruments and infrastructure supporting recognition, mobility, diversity and accountability. This might include:

- / Recognising results or decisions of EQAR-registered quality assurance agencies
- / Facilitating the quality assurance of joint programmes by recognising processes of registered agencies in other countries
- / Recognising all qualifications/awards from institutions that are subject to external quality assurance by EQAR-registered agencies
- / Building on quality assurance systems as a basis for trust when implementing qualifications frameworks and recognition procedures
- / Allowing higher education institutions to choose a quality assurance agency that best fits their mission and profile

The EQAR Annual Report 2010 includes an overview of examples from a number of countries that have already taken steps at national level to recognise the work of EQAR-registered agencies in other countries.

EQAR believes that more use could be made of the existing instruments established at European level in order to address the challenges of higher education today and to contribute to a greater convergence of structures, while preserving and promoting Europe's rich diversity in higher education.

8. EQAR Input to the MAP-ESG Project

(August 2011, agreed by the Register Committee)

1) Introduction

The European Quality Assurance Register for Higher Education (EQAR) has been using the Standards and Guidelines for Quality Assurance in the European Higher Education Area (European Standards and Guidelines, ESG) as criteria for inclusion on the Register of quality assurance agencies, according to its mandate given by ministers and EQAR's founders. EQAR has evaluated applications from 35 quality assurance agencies since it opened for applications in August 2008.

EQAR welcomes the E4 Group initiative to measure and evaluate the implementation and application of the ESG with a view to recommendations as to possible revisions. EQAR is committed to contribute to that process on the Advisory Board of the MAP-ESG project.

This statement sets out the strengths and challenges observed by the EQAR Register Committee in using the ESG. EQAR considers important that these are taken into account in the current review of the ESG.

2) Purposes of the ESG

The ESG set out the following purposes (p. 13):

/ to improve the education available to students in higher education institutions in the EHEA;

/ to assist higher education institutions in managing and enhancing their quality and, thereby, to help to justify their institutional autonomy;

/ to form a background for quality assurance agencies in their work;

/ to make external quality assurance more transparent and simpler to understand for everybody involved.

The following wider objectives were formulated (p. 14):

/ to encourage the development of higher education institutions which foster vibrant intellectual and educational achievement;

/ to provide a source of assistance and guidance to higher education institutions and other relevant agencies in developing their own culture of quality assurance;

/ to inform and raise the expectations of higher education institutions, students, employers and other stakeholders about the processes and outcomes of higher education;

/ to contribute to a common frame of reference for the provision of higher education and the assurance of quality within the EHEA.

At the same time, the authors of the ESG stressed that they should not “dictate practice or be interpreted as prescriptive or unchangeable” (p. 13). The ESG developed primarily as a tool supporting development of quality assurance systems at institutional and external level, rather than as threshold standards.

3) Main Strengths

The ESG appear to have served as a strong driver for change and development of national and institutional quality assurance systems. They have fulfilled their purpose of providing a common background for the work of quality assurance agencies and serving as a common reference for higher education institutions.

Since the beginning of the Bologna Process, national governments in the European Higher Education Area (EHEA), quality assurance agencies and higher education institutions alike have undertaken to develop or reform their quality assurance practices. The establishment of the ESG reinforced this development and encouraged countries to align their systems with the agreed principles set out in the ESG. In many countries, it is a priority that the national arrangements should be (made) compatible with the

ESG. Taking into consideration the national and regional differences in Europe this is a major achievement.

In providing such a common framework the ESG have also established a basic common language and thereby help making quality assurance understood across borders.

One key factor for the success of the ESG certainly is the fact that they were developed jointly by quality assurance agencies, higher education institutions and students, based on a mandate of Bologna Process ministers, who also adopted the ESG.

Consequently, the ESG have enjoyed support of all stakeholders and are broadly recognised across the EHEA by those involved in quality assurance.

Through being enshrined in the ESG, even principles that were traditionally controversial in some contexts, such as the publication of reports or the involvement of stakeholders, have become more widely accepted in the EHEA.

The ESG have served as a basis for mutual trust, cooperation and benchmarking among quality assurance agencies. The existence of common principles for external quality assurance procedures, for instance, made it easier for there to be cooperation of quality assurance agen-

cies across borders in modelling joint external quality assurance procedures for joint study programmes. Other agencies used the ESG as a reference framework to systematically compare and benchmark their activities with agencies inside or outside Europe. Existing studies suggest that the ESG have inspired the development of quality assurance systems at institutional level, both directly and indirectly through references in quality assurance requirements formulated at national level.

While the approaches to internal and external quality assurance, and the procedures actually used, differ widely across Europe, the ESG have successfully set out the cornerstones of what might be called the “European quality assurance approach”. The diversity of practices and procedures can be seen as one feature of that approach. Other key features include the primary responsibility of HEIs for quality assurance, the active role of students and stakeholders, as well as the publication of reports.

4) Nature of the ESG and “Substantial Compliance”

While not one of their declared purposes, the ESG have been used as a compliance instrument. Some quality assurance agencies apply part 1 of the ESG directly as criteria in their accreditation or audit processes. EQAR has been using the ESG (parts 2 and 3) as criteria for inclusion on the Register of quality assurance agencies; ENQA has been using them as membership criteria.

This has sometimes led to unrealistic expectations of a “checklist-type” consistency in deciding on compliance with the ESG. However, given the nature of the ESG and the notion of “substantial compliance”, such expectations cannot be fulfilled and disagreements on borderline judgements must be accepted as a natural consequence of the approach.

The ESG include a wide range of principles and elements that should be part of an established quality assurance system. Some standards and their respective guidelines are broader than others, and some aspects are duplicated in the ESG. Thus, it would not be prudent to use the ESG as a checklist de facto.

Hence, EQAR does not use a numerical formula in determining what constitutes “substantial compliance” with the ESG. Falling short of one specific aspect of the ESG might be acceptable if that is the only shortcoming, but in another case might add up to a list of issues that result in an agency not being considered substantially compliant in the end. In reviewing the ESG it should be considered what nature and style is appropriate for the ESG, bearing in mind that – although originally not intended – they are used as

threshold standards in practice. It should also be considered how the notion of “substantial compliance” could be clarified.

It might further be useful to clarify which of the various elements and principles enshrined in the ESG are crucial, indispensable features of a credible and legitimate quality assurance system in line with European standards, and which ones are other important, but less crucial, aspects. For instance, the publication of system-wide analyses (ESG 2.8) might be considered less crucial than the existence of clear criteria (ESG 2.3) or the independence of the agency (ESG 3.6).

In considering individual cases there have frequently been different views as to how flexibly the ESG should be interpreted and applied in the light of the national context and particularities, for instance in legislation.

Given the diversity of European higher education systems it is inevitable that teams of experts make judgements on a quality assurance agency’s activities against the ESG and in the light of its national context. This is the nature of peer review and requires considerable analysis and judgement by the teams, which form the basis for EQAR’s decisions.

In order to enable these judgements to be made consistently it is imperative that the ESG are formulated as concisely and unambiguously as possible. This is especially important in a context where the ESG are not only used for development purposes, but also as threshold standards.

5) Developing Context

The ESG were developed in a context of external quality assurance being organised predominantly at national level. Consequently, the ESG emphasise subsidiarity and national autonomy in implementing the agreed principles.

National authorities put in place quality assurance systems for their jurisdiction, including an external quality assurance agency. In that context, any given higher education institution (and its programmes) would normally be subject to periodic external quality assurance by always the same agency.

In that setting it is usually in the agency’s remit to fulfil a specific aspect of the ESG (parts 2 and 3). If the agency cannot do so because of its legal basis, the government could empower the agency to do so, or change the legal framework. It could be determined in each specific case what was practically in the remit of the agency, and what could only be changed by/after legislative changes.

In some European countries, however, HEIs can choose from amongst several (nationally licensed or recognised) agencies for their compulsory accreditations or evaluations. These systems only partly fit in the “traditional” context. For certain aspects of the ESG, e.g. periodic reviews (2.7) and system-wide analyses (2.8), it may be subject to dispute whether they are in the remit of individual agencies, or need to be dealt with at system level. Over the past years and, amongst others, due to the establishment of EQAR, the context has changed in some cases.

An increasing number of agencies conduct evaluations or audits of higher education institutions outside the countries in which they enjoy official, formal recognition, often based on voluntary assignments and thus as a (commercial) service, rather than as a statutory function.

As of 2011, 37% of all EQAR-registered agencies operate in more than one country. Only in some cases is this due to official recognition in several countries. Of 45 quality assurance agencies participating in a survey conducted by EQAR in 2010, 53% stated that they work with institutions “outside the country/-ies in which [they] are registered”.

In ENQA's 2008 survey "Quality Procedures in the European Higher Education Area and Beyond", almost 90% of agencies specified that their "primary domain" was national, only four agencies stated that their "primary domain" was international. The term "primary domain", however, appears to reflect that agencies also undertake (additional) quality assurance activities outside of it. These might or might not be formally recognised as external quality assurance activities in the sense of fulfilling higher education institutions' statutory obligations in a certain country.

The remit of agencies vs. national systems

More recently, countries have begun to recognise all EQAR-registered agencies in their jurisdiction (e.g. Austria, Denmark, Lithuania, Romania). These countries allow HEIs to choose from amongst all registered agencies, either generally for all external quality assurance obligations or under specific conditions, such as for joint programmes or after initial accreditation. Other countries (Flemish Community of Belgium, Finland, Liechtenstein) plan to introduce such formal recognition of EQAR-registered agencies.

In these countries, the "traditional setting" – one agency being in charge of a clearly defined group of institutions, or one institution being subject to periodic external quality assurance by one and the same agency – is no longer the only reality. In these changed circumstances – where one institution might work with several, changing agencies – a clear distinction is warranted between requirements that have to be met at system level, on the one hand, and those in the remit of agencies themselves, on the other hand.

For instance, ESG 2.7 (periodic reviews) also refers to a characteristic of the national (or regional, or bi-national) legislative system. In systems that allow HEIs a choice from amongst different agencies it is a question of applicable legislation, rather than relating to the capacity of a specific agency, whether or not periodic reviews effectively take place.

The new circumstances described above should be considered in reviewing the ESG. It might be necessary to clarify which standards and guidelines effectively address what is in the remit of agencies and institutions, as opposed to aspects in the remit of governmental authorities and their responsibility for the legal framework.

The type of activities covered by the ESG

The ESG do not specify clearly whether or not they cover voluntary, "non-statutory" quality assurance activities such as described above.

Some ESG indicate that they do not cover such activities: Periodic or cyclical reviews (ESG 2.7) can only be ultimately "enforced" by laws or by an agency with own formal authority. An agency can only fully meet this standard if it is permanently embedded in a national system. However, in a system where institutions can turn to several agencies, one agency itself cannot effectively ensure periodicity of reviews.

The requirement to be "formally recognised by competent public authorities in the [EHEA] as [agency] with responsibilities for external quality assurance" (ESG 3.2) will be difficult to meet for "self-appointed" agencies.

On the other hand, the initial proposal for a register of agencies, which is part of the ESG, explicitly recognises the activity of agencies that are "not nationally recognised" (p. 29) and states that those "must also be allowed to opt for a review that assesses its compliance with the European standards" (p. 29) and should be included in a register of agencies according to their level of compliance. This would indicate that the authors envisaged the ESG (and EQAR) to include also non-statutory quality assurance activities.

It is not always clear whether governments recognising all EQAR-registered agencies desire to also open the opportunity

for such “self-appointed” agencies that are not already recognised by national law in some country, but would only acquire recognition by virtue of being on the Register.

It is essentially a policy question whether cross-border recognition of quality assurance agencies and their decisions/outcomes should take place between those agencies established (or mandated) by national authorities, or should be open to non-national, non-statutory organisations, provided they comply with the ESG.

There is a need for a policy discussion on that question, which would impact both the required characteristics of the ESG as well as the role of EQAR.

6) Challenges Encountered

In the following, a number of specific challenges encountered in EQAR’s work with the ESG are set out.

Meta-level activities

In a few cases, the ESG were used as a reference to evaluate activities that are not directly dealing with institutions, but situated at meta-level. This includes exercising oversight over quality assurance agencies or setting standards for use in quality assurance of higher education.

EQAR came to the conclusion that the ESG address direct external quality assurance activities in higher education, i.e. audit, accreditation, evaluation or other types of review of higher education institutions, programmes or other units. Standards 2.1, 2.7, 3.3 and 3.7 particularly refer to such activities.

EQAR found that the ESG are not applicable to meta-level activities and, consequently, not applicable to organisations conducting only such meta-level activities, but not having direct external quality assurance functions.

It might be beneficial to clarify more explicitly which types of activities are addressed by the ESG.

Structure of ESG parts 2 and 3

The current ESG address external quality assurance (part 2) and quality assurance agencies (part 3). This distinction between the quality assurance activities or procedures

that agencies implement, on the one hand, and agencies as organisations, on the other hand, has proven useful.

There are, however, two standards which are not consistent with that structure: ESG 2.8 (System-Wide Analyses) is a requirement addressing the agency as a whole, rather than its different activities or procedures. It would thus better fit into part 3.

ESG 3.7 (...) addresses the agency’s external quality assurance activities in detail. One would normally expect to find it in part 2 (see also “Duplication” below).

Duplication of Elements

There are some duplications in the ESG. In particular, a range of issues are addressed both in standard 3.7 as well as in part 2.

This includes, for instance the existence of predefined and published criteria (2.3), the typical four step model (self-evaluation, site visit by experts, external report, follow-up, see 2.4) and the publication of reports (2.5).

It would be helpful to remove such redundancies so as to ensure that the same issue is addressed once and always under the same heading.

The duplication of elements is particularly problematic where issues are not

addressed entirely consistently. This easily happens due to different wording in ESG 3.7 versus part 2, or due to the fact that the same issue might be part of the standard 3.7 and is addressed in greater detail, but only as a guideline in part 2.

One example is the participation of students, which is tackled in standard 3.7 and in guideline 2.4 in a slightly different wording. Another example is site visits, which are mentioned as a standard practice in the guideline to 2.4, while their mention in standard 3.7 is qualified by “as decided by the agency”.

In reviewing the ESG the importance of internal coherence should be considered.

The Role of Standards vs Guidelines

The guidelines set out to “provide additional information about good practices and [...] explain in more detail the meaning and importance of the standards” (p. 15). At the same time, in some cases the guidelines mention aspects that might be seen to reach beyond what is required by the text of the standard. The question has frequently been raised how “binding” these should be considered as they are only subtly implied in the corresponding standard.

In particular, there are aspects currently addressed “only” in the guidelines, even though they are widely regarded as important features of a credible quality assurance activity:

- / Participation of international experts in reviews (2.4)
- / Presence of an official appeals or complaints procedure (3.7)

It would thus be useful to consider the distinction between standards and guidelines. This includes the questions which issues should be addressed in a standard and which in a guideline, as well as how a standard needs to be formulated as opposed to a guideline.

Missing aspects

It should be considered some aspects are currently not addressed by the ESG:

- / The guideline to ESG 3.8 expects quality assurance agencies to ensure the quality of subcontracted activities.

It might be considered whether it would be useful to also have a more general requirement that agencies should work and communicate in a reputable manner. This

would, for instance, mean not cooperating with “accreditation mills”, or other disreputable or dubious bodies.

While this goes without saying, it might be useful to include a specific reference in order to raise awareness of the practices of disreputable players.

/ If the ESG were to become explicitly open to self-appointed, private quality assurance providers, it should be considered whether additional requirements would be needed.

For instance, it would need to be clear whether agencies could only be non-profit or charitable organisations, or also profit-oriented.

Another necessary requirement could be that agencies only accredit (programmes at) institutions which are officially recognised where they operate.

7) Concluding remarks

The ESG have been a valuable and useful tool for developing quality assurance in the European Higher Education Area (EHEA). They have inspired change at various levels and constitute the foundation of the European infrastructure aimed at enabling different quality assurance systems to articulate better with each other.

The changing context and realities of

quality assurance in Europe, especially the diverse legal and regulatory setups for external quality assurance, pose new challenges for the ESG as well as EQAR, which need to be taken into account in reflecting on the role and nature of a European reference framework for quality assurance.

It would be useful if the ESG were to offer clear and distinctive definitions of key terms such as “evaluation”, “assessment”, “review”, “audit” and “accreditation”, in order to clarify which activities they address.

In the light of the recent more general debates in the European higher education policy community it could also enhance clarity to address the differences in aims and methodologies, as well as the possible interaction, between quality assurance, transparency tools and rankings. Similarly, it could be beneficial if the ESG articulate (possibly in a foreword or other supplementary text) the relations of quality assurance to other tools and initiatives of the Bologna Process, such as ECTS and qualifications frameworks, so as to enhance the coherence of the European infrastructure.

