

# Implementation and Innovation in QA through Peer Learning (IMINQA) QA of European Universities Desk Research Analysis

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## Introduction

EQAR has been tasked to carry out an analysis of legal and regulatory obstacles for quality assurance (QA) procedures of the European Universities Alliances. The analysis is carried out within the IMINQA project (as part of Work Package 6) under the coordination of Flemish Department of Education and Training (MINEDU-FC) and the Working Group on the QA of European Universities.

The analysis is based on desk research and will be followed by a feasibility study considering the implementation of the European Framework for Comprehensive QA of European Universities (the EUniQ framework<sup>1</sup>) in five EHEA countries, where the possibility to use European Approach for the QA of Joint Programmes is already possible. Two small Peer Learning Activities (PLAs) will be organised in order to enable peer support among those selected countries. Outcomes of the feasibility study can be used by other countries to develop an own approach suitable for their country.

The analysis builds upon EQAR's Knowledge Base<sup>2</sup> (and further national legislation) on legal frameworks on quality assurance, the data collected as part of the Database of External Quality Assurance Results (DEQAR, statistical data<sup>3</sup> as of 15 December 2022) and the outcomes of the EUniQ project.

## Objectives

The current desk research analysis intends to identify specific challenges linked to (national or regional) frameworks (at both regulatory and legal level) that may have requirements that are conflicting, creating a need for double or multiple procedures, leading to lack of clarity and transparency (one criteria might be fully met in one system, but not at all in another) and that is why they might not be helpful for Alliances.

The desk research specifically looks into the EUniQ project Roadmap<sup>4</sup> for the implementation of the European Framework considering the possibility to carry out a simplified evaluation using the European Approach for QA of Joint Programmes, considering the flexibility and openness in applying the European Framework and the possibility to choose an EQAR registered agency.

Based on EQAR's knowledge base and legal frameworks the following information have been analysed:

- a. requirements for external quality assurance within EHEA at programme and institutional level;
- b. openness in allowing higher education institutions to use an EQAR-registered QA agency (openness to cross-border QA);
- c. possibility to employ the European Approach for QA of Joint Programmes.

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<sup>1</sup> <https://www.nvao.net/nl/euniqu>

<sup>2</sup> <https://www.eqar.eu/kb/country-information/>

<sup>3</sup> <https://www.eqar.eu/qa-results/search/>

<sup>4</sup>

<https://www.nvao.net/nl/attachments/view/QA%20Development%20Roadmap%20-%20Implementing%20the%20European%20Framework%20for%20the%20Comprehensive%20Quality%20Assurance%20of%20European%20Universities>

The result of this exercise will be discussed and considered by the Working Group on QA of European Universities and support the further analysis of the legal obstacles in their country to apply the EUniQ framework.

## 1. External quality assurance requirements within EHEA

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The roadmap set out as part of the EUniQ project, follows the principles of the EHEA ministerial commitment on quality assurance, i.e., respect for the diversity of QA frameworks, ensuring that universities maintain the responsibility for their internal QA, an internal and external QA in line with the ESG, the opportunity for higher education institutions to use the European Approach for the QA of Joint Programmes (EA) and the possibility to use a suitable EQAR registered QA agency (openness to cross-border QA).

An overview of the external QA picture within the EHEA shows an intricate layer of reviews, evaluations, assessments, audits, certifications and accreditations that are carried out regularly, occasionally, at fixed or conditional intervals of time. Data collected through DEQAR reveals that the most common cycle of external QA is 5 or 6 years. This varies a lot depending on the procedure or the consequences of a previous decision (i.e., conditional accreditation vs. full accreditation). Lengthier accreditation cycles are found in e.g., Georgia (accreditation of educational programmes every 7 years), Lithuania (institutional review every 7-8 years), Estonia (institutional accreditation every 7 years) while shorter cycles are a feature of an accreditation with conditions or restrictions, e.g., in Denmark, Romania, Georgia, Hungary, and Portugal programme accreditation may be awarded with conditions for only 1 to 3 years.

EQAR's Knowledge Base shows that only a handful of countries require external quality assurance at only one level i.e., either only at programme level or only at institutional level; while most countries require external QA at both levels.

Six EHEA higher education systems only require institutional level external QA, which may take the form of audits (in Finland), institutional evaluations (in Iceland, Wales, Scotland and Northern Ireland) or institutional accreditation (in Turkey). Programme level external QA might still be taken up by institutions voluntarily, as a way to increase recognition within a specific field of study and in order to improve their reputation internationally, but they are not mandated as part of the external QA framework (RIQAA, 2014<sup>5</sup>).

In Poland and Ukraine only study programmes are required to undergo regular external QA. In all other countries a combination of both programme and institutional level external QA is generally employed, even though not all institutions will always be subject to both approaches regularly.

The combined programme and institutional level evaluations further illustrates the diversity of external QA approaches in higher education:

- some countries have introduced a lighter form of programme level external QA to complement their institutional level evaluations (e.g., Portugal, Netherlands);
- other countries have a clustered external QA at programme (subject or discipline) level i.e., Belgium (French Community), France, Estonia and Hungary use clustered evaluations for the 1st and 2nd cycle; Latvia, Lithuania and Romania carry out clustered evaluation for the 2nd cycle, while Croatia introduced clustered evaluation of the 3rd cycle. In France, the QA agency also evaluates and prepares a synthesis report on an

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<sup>5</sup> [https://www.eqar.eu/assets/uploads/2018/04/WP5\\_RIQAA\\_Report\\_final.pdf](https://www.eqar.eu/assets/uploads/2018/04/WP5_RIQAA_Report_final.pdf)

institution's 3rd cycle, thus also carrying out a "clustered external QA" at the discipline or subject level.

- in a number of higher education systems, programme level external QA is only occasionally carried out, depending on the type of accreditation, the field of the study or the self-accreditation status of the HE institution. Belgium (Flemish Community), Croatia, Lichtenstein, and Slovenia require an external QA process at programme level only for the establishment of new study programmes; Armenia and Switzerland require programme level accreditation only for medical study programmes; Cyprus, Norway and Ireland require external QA of study programmes for institutions who do not (yet) have 'self-accreditation rights'.

### Alignment of External QA Systems with the ESG

The share of higher education institutions that have been reviewed by an EQAR-registered agency (at programme and/or at institutional level) represents a good indicator on the extent to which a country has realised the key commitment on having their higher education systems reviewed against the ESG (although it may exclude presently the few countries where the national QA agency has not yet uploaded the QA reports into DEQAR).

The 78 173 quality assurance reports<sup>6</sup> gathered in DEQAR provide a good estimate on the coverage for 25 countries with at least 50% of higher education institutions being reviewed at programme or institutional level by an EQAR-registered agency<sup>7</sup>. Table 1 displays the DEQAR coverage per EHEA member.

Country	Coverage	HEIs total <sup>8</sup>	HEIs covered	Reports <sup>9</sup>
Montenegro (ME)	100.00%	7	7	9
Norway (NO)	100.00%	47	47	67
Lithuania (LT)	100.00%	41	41	1490
Estonia (EE)	100.00%	21	21	189
Liechtenstein (LI)	100.00%	3	3	7
Romania (RO)	98.00%	94	93	3544
Finland (FI)	97.00%	46	45	162
Croatia (HR)	96.00%	134	129	490
Sweden (SE)	95.00%	41	39	34
Slovenia (SI)	94.00%	56	53	1107
Belgium (BE)	90.00%	170	153	5491
Denmark (DK)	88.00%	42	37	69
Germany (DE)	85.00%	484	413	31506
Kazakhstan (KZ)	83.00%	159	133	5209

<sup>6</sup> Values included above represent the data collected before 23/12/2022.

<sup>7</sup> Data based on reports uploaded by 45 of the 50 EQAR-registered agencies contributing to DEQAR.

<sup>8</sup> For majority of countries, the list of institutions is provided through the European Tertiary Education Register (ETER) by the national statistical authorities or national higher education ministries which collect data and compile statistics for national and EU purposes. In some countries (e.g. Belgium), due to the historically independent status and the regional/national cultural understandings of the status "higher education institution", some smaller units (e.g., academies, schools etc.) are considered to be separate institutions in ETER and/or in DEQAR.

<sup>9</sup> Number of external QA reports at institutional or programme level.

Spain (ES)	79.00%	915	728	11153
France (FR)	75.00%	491	373	12154
Georgia (GE)	73.00%	80	59	855
Portugal (PT)	72.00%	134	97	583
Hungary (HU)	71.00%	67	48	116
Austria (AT)	68.00%	77	53	255
Poland (PL)	63.00%	541	346	3029
Latvia (LV)	62.00%	48	30	81
Moldova (MD)	60.00%	28	17	40
Luxembourg (LU)	60.00%	5	3	15
Malta (MT)	50.00%	2	1	3
Armenia (AM)	40.00%	71	29	51
North Macedonia (MK)	37.00%	16	6	23
Switzerland (CH)	32.00%	56	18	69
Netherlands (NL)	20.00%	62	13	19
Czech Republic (CZ)	16.00%	66	11	16
Ireland (IE)	14.00%	27	4	4
Bosnia and Herzegovina (BA)	12.00%	32	4	18
Iceland (IS)	12.00%	8	1	8
Albania (AL)	10.00%	40	4	6
Cyprus (CY)*	52	5	44	
Turkey (TR)	8.15%	184	15	69
Bulgaria (BG)*	6.86%	102	7	42
United Kingdom (GB)*	6.52%	276	18	31
Greece (GR)	6.35%	63	4	8
Italy (IT)	4.95%	222	11	13
Serbia (RS)	4.00%	50	2	20
Slovakia (SK)	3.03%	33	1	1
Ukraine (UA)	1.99%	702	14	32
Andorra (AD)	0.00%	2		
Azerbaijan (AZ)	N/a <sup>10</sup>	5	5	32
San Marino (SM)	N/a	0		
Holy See (VA)	N/a	0		

*Table 1. DEQAR coverage of higher education systems in EHEA (December 2022)*

Table explanation: the HEI coverage is calculated based on the total number of higher education institutions in the country (HEI total) - as reported by national statistical authorities or national higher education ministries - and the HEI externally reviewed at programme or institutional level (HEI covered) by an EQAR-registered agency.

By the end of 2022, DEQAR did not include any external QA reports for higher education institutions from Andorra, Holy See and San Marino. Countries like Azerbaijan, Ukraine, Slovakia, Serbia, Italy, Greece, and Turkey have a limited number of external QA reports. This

<sup>10</sup>DEQAR does not include the full list of existing higher education institutions in Azerbaijan, San Marino & Holy See as these systems are not covered by ETER/OrgReg and have not provided the data to EQAR separately. Hence, no percentages can be calculated.

is mainly due to the lack of external QA activity by an EQAR-registered agency in these systems; in other countries (Cyprus, United Kingdom, Bulgaria, marked with a star-shaped figure \*) there is a national EQAR-registered agency that has not yet provided data to DEQAR by 2022.

The majority of external QA procedures are carried out at programme level (96%), with institutional level external quality assurance only amounting to 3% and joint programme procedures at 0,18% (see table below). Most of the programme level external QA data comes from three of the largest higher education systems in EHEA i.e., Germany at 40%, followed by France at 15% and Spain at 14% respectively.

## 2. The European Approach for QA of Joint Programmes within EHEA

The European Approach was developed to ease external quality assurance of joint programmes. It includes a set of agreed standards for joint programmes based on the Standards and Guidelines for quality assurance in the European Higher Education Area (ESG) and the Qualifications Framework of the European Higher Education Area (QF-EHEA).

In countries with mandatory programme level external QA, the European Approach is usually only recognised within the obligatory external quality assurance system if the legal framework has been adapted so as to enable that a European Approach accreditation/evaluation may replace one according to the national process and criteria. The European Approach is usually available without any legal changes for higher education institutions who are autonomous in approving their own study programmes (i.e., have self-accrediting powers) and organise the internal quality assurance of their own programmes.

In 2017, 29 countries in the EHEA did not offer higher education institutions the possibility to use the European Approach at all. In 2020, this has changed to 20 countries, while by end of 2022 the European Approach is in principle (fully or with conditions) available to all institutions within 23 higher education systems and to some institutions only in another 7 systems. In 18 higher education systems the European Approach is not available or exceptions have been made for a specific procedure, but no changes in the legal framework have been enacted yet (see Table below).

Country	Availability of the EA	No. of HE institutions using EA
Albania	Not available	1
Austria	Only for some HEIs	3
Belgium/Flemish Community	All HEIs	3
Belgium/French Community	All HEIs	0
Bosnia and Herzegovina	Only for some HEIs	1
Bulgaria	Not available	0
Croatia	Not available	1
Cyprus	Only for some HEIs	0
Czech Republic	Not available	1
Denmark	All HEIs	2
Estonia	Available with conditions	1
Finland	All HEIs	1
France	Available with conditions	6

Georgia	Available with conditions	0
Germany	Available except for double/multiple degrees	11
Greece	Not available	0
Holy See	Not available	0
Hungary	All HEIs	1
Iceland	Not available	0
Ireland	Only for some HEIs	2
Italy	Not available	2
Kazakhstan	All HEIs	0
Latvia	Not available	0
Liechtenstein	All HEIs	0
Lithuania	All HEIs	0
Luxembourg	Only for some HEIs	0
Malta	All HEIs	1
Moldova	All HEIs	0
Montenegro	Not available	0
Netherlands	All HEIs	7
North Macedonia	Not available	1
Norway	Only for some HEIs	3
Poland	All HEIs	2
Portugal	Available with conditions	1
Romania	All HEIs	1
San Marino	Not available	0
Serbia	Not available	0
Slovakia	Not available	0
Slovenia	Available with conditions	2
Spain	All HEIs	6
Sweden	Not available	1
Switzerland	All HEIs	0
Turkey	Not available	0
Ukraine	Not available	0
UK – England	All HEIs	0
UK – Northern Ireland	All HEIs	0
UK – Wales	All HEIs	0
UK – Scotland	All HEIs	0

*Table 2. Country, availability of the EA and number of procedures*

Some countries use specific conditions in the pre-approval stage or in the recognition of the final EA procedure:

- In **Estonia**, the European Approach can be employed if the programme has previously undergone an assessment by an EQAR registered agency and if the other higher education partners have the right to provide instruction in the corresponding study programme group and academic cycle. The national QA agency also has to assess if the eligibility criteria are met and if no substantial shortcomings have been identified in the assessment report.

- In **France**, the European Approach is subject to a check by the national agency and the ministry with additional checks being made on (compliance criteria with regards to research-based learning and students' employability), the European Approach framework is considered incomplete.
- In **Slovenia**, the European Approach can only be used for programmes where all partner higher education institutions involved are (institutionally) accredited by EQAR-registered agencies.

### European Approach uptake by higher education institutions

According to DEQAR data, the European Approach has been employed at least 17 times in the past 7 years and they were carried out by 7 EQAR-registered agencies. These joint programmes have been offered by cooperating institutions based in 30 different higher education systems, including higher education institutions from 6 countries outside of the EHEA.

Year	No of EA procedures	No. of international joint programme procedures (including EA)	No of national joint programme procedures
2016	1	1	4
2017	2	6	5
2018	3	3	7
2019	5	11	10
2020	1	2	27
2021	5	8	11
2022	0	1	1

*Table 3. Number of EA and cross-border QA procedures by year*

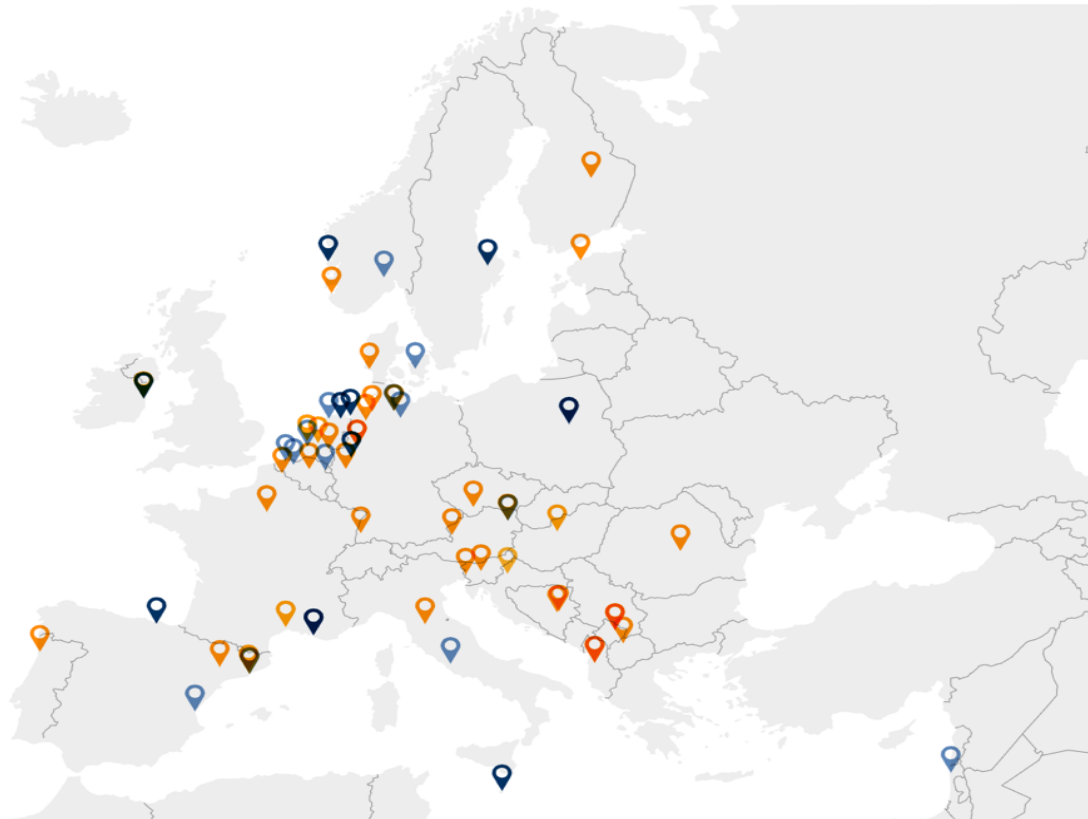
The European Approach for Joint Programmes was employed for 53% of the total number of international joint programme procedures carried out between 2016 and 2021 according to DEQAR, 32. All joint programme reports in DEQAR were carried out by a QA agency from one of the countries involved in the programme consortium, i.e. no consortium chose an agency from a third country.

It is also interesting that there is a large number of joint programmes between HEIs from the same country, but these have been disregarded for the analysis as they are not covered by the European Approach.

Most of the joint programme procedures were carried out at the level of the second cycle (71%). A preference for joint programme procedures carried out at the second cycle is also visible in the case of the EA (94%).

A large share of joint programmes are programmes offered together by higher education institutions within the same country.





*Map 1. Uptake of the European Approach within EHEA*

Map explanation: each location point on the map represents one HEI involved in a procedure carried out with the EA; each consortium that was part of the joint programme is represented in the same colour. Due to geographic proximity of HEIs, some points overlap or are invisible.

*For a full display of each higher education institution consult the map in its dynamic form at: <https://www.eqar.eu/kb/joint-programmes/>*

Considering the uptake of the European Approach within different higher education systems, the DEQAR mapping (see above) shows that the European Approach procedures have been most often employed by higher education institutions within Germany (11), Netherlands (7), France (6) and Spain (6). This is not so surprising considering the size of the higher education systems and the requirement for programme level external QA.

The small advance in the number of procedures may be due to a limited familiarity with the procedure and the difficulty of carrying out such a procedure or setting up a joint programme during covid. Other likely impediments in the use of the European Approach are due to additional, and sometimes contradictory requirements in different European countries beyond the European Approach standards, e.g., as to the number of ECTS credits assigned to the final Master thesis or the credits for certain modules or components, the length of the external QA cycle, the required language of the review report, etc.

### 3. Cross-border QA within the EHEA

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By 2022, 386 institutions based in 43 out of 47 EHEA countries have experienced a review by a foreign EQAR-listed agency. Furthermore, two thirds of DEQAR contributing agencies have carried out at least one cross-border external QA (CBQA) procedure (EQAR, 2022)<sup>11</sup>.

EQAR registration of the foreign QA agency is usually the main condition for the review to be deemed as eligible by the national authorities. This follows countries' EHEA commitment to allow higher education institutions to choose a suitable EQAR-registered agency for their mandatory external QA (Yerevan Ministerial Communiqué 2015).

The primary interest in this part of the brief are the 22 systems<sup>12</sup> in which the legislation explicitly allows institutions to use the results from an EQAR registered agency as part of their mandatory External Quality Assurance (EQA) - such legislation sends a clear signal to the institutions that CBQA is permitted and recognised for the purpose of obtaining an accreditation (or another type of EQA related formal consequence, further mandatory QA) and stimulates CBQA. For example, in countries in which registration on EQAR is explicitly used as a condition for recognition of reviews that can be performed by foreign QA agencies, on average 21%<sup>13</sup> of the institutions underwent a cross-border EQA procedure of mandatory nature. Comparatively, in the countries that use their own criteria (i.e. the EQAR registration of the foreign QA agency is not an explicit condition for recognising the review), on average 13% of the institutions underwent a CBQA.

Table 1 shows the percentage of institutions that have sought a review by a foreign EQAR – registered agency, on one hand, in systems in which an EQAR-registered agencies' reviews are recognised as part of the national QA requirements and, on another hand, in systems in which EQAR registration is not envisioned as a condition.

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<sup>11</sup> For more data on CBQA see: <https://www.eqar.eu/kb/cross-border-qa/drafting-cross-border-external-qa-activities/>

<sup>12</sup> Armenia, Austria, Belgium, Bulgaria, Cyprus, Denmark, Estonia, Germany, Hungary, Kazakhstan, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Moldova, Poland, Portugal, Romania, Slovakia, Switzerland, Ukraine

<sup>13</sup> This statistic excludes Liechtenstein or Luxembourg as all of the reviews are CB. Institutions in both systems use EQAR-registered agencies to ensure the review against the ESG.

Country	No. of HEIs with QA reports <sup>14,8</sup>	No. of HEIs that sought a CBQA with an EQAR registered agency <sup>14</sup>	No. of EQAR registered agencies that carried out mandatory CBQA
<b>Countries that recognise EQAR-registered agencies as part of the national external QA requirements</b>			
Armenia	27	2 (7%)	2
Austria	44	24 (54%)	8
Belgium	151	18 (12%)	5
Bulgaria	n/a <sup>15</sup>		
Cyprus	n/a <sup>15</sup>		
Denmark	37	3 (8%)	3
Estonia	21	2 (10%)	3
Germany	410	26 (6%)	5
Hungary	48	2 (4%)	3
Kazakhstan	108	33 (%)	5
Latvia	30	1 (31%)	1
Liechtenstein	3	3 (100%)	3
Lithuania	46	5 (11%)	6
Luxembourg	2	2 (100%)	2
Malta	n/a <sup>16</sup>		
Moldova	n/a <sup>16</sup>		
Poland	345	12 (3%)	8
Portugal	93	5 (5%)	4
Romania	93	11 (12%)	7
Slovakia	n/a <sup>16</sup>		
Switzerland	9	6 (67%)	4
Ukraine	n/a <sup>16</sup>		
<b>Countries that recognize QA agencies using their own framework or requirements</b>			
Albania	n/a <sup>16</sup>		
Czech Republic	n/a <sup>16</sup>		
Finland	45	6 (14%)	3
France	371	19 (5%)	7
Georgia	59	3 (5%)	2
Greece	n/a <sup>16</sup>		

Montenegro	n/a <sup>16</sup>
Netherlands	n/a <sup>15</sup>
Turkey	n/a <sup>16</sup>

Table 4. Higher education institutions that underwent a CBQA of mandatory nature and the number of agencies that performed the CBQA

### Conditions for EQAR registered agencies to perform Cross-border QA in EHEA countries

Findings show that despite the EQAR registration, additional conditions are often added before recognising cross-border external QA results. The conditions are applied prior, throughout and after the review is done.

The analysis shows that the following conditions are frequently applied in EHEA countries:

1. An obligation for the foreign agency to be approved by a competent national body (e.g., ministry or national QA agency)
2. The foreign QA agency needs to agree on the terms and conditions of the review with the national agency
3. An obligation of the foreign QA agency to use the regulations and frameworks of the country or the national agency where the institution is based
4. An initial accreditation can only be awarded by the national QA agency
5. An approval of the review after the procedure is completed through a decision by a competent national body

Additional limitations are also prescribed in the national frameworks in some of the EHEA countries. They concern the (a) level of the cross-border QA activity (i.e., CBQA is only permitted on institutional or programme level) and (b) the type of institution that can employ a cross-border review (i.e., public or private institution).

Practices demonstrate that in different national systems one or combination of several conditions (co-)exist. Some examples include:

In **Estonia**, the higher education institution must submit a request for a new accreditation, including information about the foreign agency that will undertake the review to the national QA agency (HAKA). After the approval, a tripartite agreement is concluded between the foreign QA agency, the higher education institution and HAKA. Expenses related to the institutional accreditation by a foreign QA may be covered from the state budget, as long as they do not exceed the costs of a national accreditation.

In **Portugal** the foreign agency needs to be approved by the national agency (A3ES) before the review. Once the review is completed, A3ES decides, on a case-to-case basis, whether to accept the result of the assessment/accreditation procedure.

In the **French Community of Belgium**, the national QA agency (AEQES) reviews the request of the higher education institution to recognise the programme evaluations carried out by a

<sup>14</sup> Number of institutions that have at least one report in DEQAR

<sup>15</sup> The national QA agency has not uploaded any reports in DEQAR so far, hence no comparative analysis on national level is possible at the given time

<sup>16</sup> No national QA agency is registered with EQAR, hence no comparative analysis on national level is possible at the given time

foreign agency. External QA carried out by EQAR-registered agencies go through a simplified procedure.

In the **Flemish Community of Belgium**, institutions can use a review by an EQAR-registered agency in the mandatory EQA procedures only at programme level. The foreign agency can use its own criteria, but the final report is subjected to a “methodological check” by NVAO (the bi-national QA agency in Flanders and the Netherlands).

In **Denmark**, the institutions are able to choose an EQAR-registered agency for the accreditation of Danish education programmes offered abroad and the accreditation of professional education programmes offered by transnational providers.

In **Lithuania**, cross-border reviews that are recognised as part of the regular EQA, are limited to cluster programme evaluations. The evaluation has to be carried out using the national criteria. The accreditation decision is taken by the national QA agency (SKVC) based on the foreign agency's report.

In **Poland**, institutions are 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 an EQAR-registered agency have the right to establish branch HEIs or departments. Foreign QA agencies can use their own criteria when performing EQA of Polish institutions.

In **Switzerland**, higher education institutions may choose an EQAR-registered agency that is further recognised by the Swiss Accreditation Council. The foreign agency needs to align its accreditation procedures with the national requirements or, alternatively, to use the guide of the national QA agency (AAQ).

### Implications for Cross-border QA

Additional conditions such as the above can disincentivise the collaboration with foreign agencies by imposing additional administrative and financial burden for the institutions.

A brief analysis suggests that in those jurisdictions with less conditions, more institutions opt for CBQA. For example, in Kazakhstan no additional conditions are applied when an institution requires recognition of the review performed by an EQAR registered agency – the recognition is automatic. In this country, 31% of the institutions have undergone a CBQA review performed by an EQAR registered agency.

Other countries with high percentage of institutions that underwent CBQA by an EQAR registered agency are Switzerland (67%) and Austria (54%). Further analysis is needed to explore interplay with other factors that affect the status quo (e.g., fee policy, same work language used by the institutions and the foreign agencies (EQAR, 2020), cultural understandings on the CBQA, system openness to internationalisation, etc.).

The conditions for CBQA imposed by EHEA governments also impact the work of the QA agencies. An overview of the CBQA activities of the EQAR-registered agencies (presented in Table 3) shows that they mainly operate in contexts where the legislation enlists the EQAR registration as a main condition for performing mandatory EQA, or in which EQAR registration is not an explicit condition but used in practice in the decision-making processes (e.g., France, Spain).

Agency (Location)	Country <sup>17</sup>
ASIIN (DE)	France, Kazakhstan, Spain/Finland
AQAS (DE)	France
FIBAA (DE)	Austria, Kazakhstan
HCERES (FR)	Armenia
AQ Austria (AT)	Germany, Croatia, Slovenia
AHPGS (DE)	Switzerland, Austria/Romania/Slovenia

*Table 5. EHEA member countries in which the QA agency has performed the most reviews of mandatory nature (by no. of institutions)*

### 3. Conclusions

The analysis illustrates that cross-border recognition of external QA results is possible in an increasing number of jurisdictions, but there are strings attached in many cases that can make it burdensome and complicated in practice. The agreed framework established by the European Approach for joint programmes has certainly facilitated single external QA procedures and eased their cross-border recognition somewhat. Yet, even those are often only recognised subject to additional conditions or approval processes to be followed afterwards.

Nevertheless, the European Approach seems to emerge as preferred choice for quality assurance of international joint programmes and has gained more traction recently. Even though the total number of European Approach procedures remains small with 17, some countries have gained significant exposure with 5 or more HEIs having experienced a European Approach review. These could share their valuable insights with others.

<sup>17</sup> For the agencies that have less than 3 systems enlisted, the sample had larger number of countries with the same number of reports. Hence, the table only shows the list in cases there a ranking was possible to be made

## List of abbreviations

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AAQ	Swiss Agency of Accreditation and Quality Assurance
AEQES	Agence pour l'Evaluation de la Qualité de l'Enseignement Supérieur
AHPGS	Accreditation Agency in Health and Social Sciences
AQAS	Agency for Quality Assurance through Accreditation of Study Programmes
AQ Austria	Agency for Quality Assurance and Accreditation Austria
ASIIN	ASIIN e.V.
A3ES	Agency for Evaluation and Accreditation of Higher Education
CBQA	Cross-border QA
DEQAR	Database of External Quality Assurance Results
ECTS	European Credit Transfer System
EA	European Approach for the QA of Joint Programmes
EHEA	European Higher Education Area
EQA	External Quality Assurance
EQAR	European Quality Assurance Register
ESG	The Standards and guidelines for quality assurance in the European Higher Education Area
FIBAA	Foundation for International Business Administration Accreditation
HAKA	Estonian Quality Agency for Education
HCERES	High Council for Evaluation of Research and Higher Education
HEI	Higher education institution
NVAO	Accreditation Organisation of the Netherlands and Flanders
PLA	Peer Learning Activity
QA	Quality Assurance
QF-EHEA	Qualifications Framework of the European Higher Education Area
SKVC	Centre for Quality Assessment in Higher Education

## Literature

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EQAR Policy Brief: External Quality Assurance Activities within and beyond the EHEA, 2020

EQAR Policy Brief. ESG Coverage of Higher Education Systems in Europe, 2021

EUNIQ Resonance Group Paper: European Universities, legal frameworks and the ESG. Developing a European Approach for Comprehensive QA of (European) University Networks, 2021

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