The European Higher Education Area in 2020

Bologna Process Implementation Report

CHAPTER 3: QUALITY ASSURANCE AND RECOGNITION

Chapter outline

This chapter tells the story of how the related topics of quality assurance and recognition systems have developed throughout the lifetime of the Bologna Process, giving both a historical overview and a picture of the current state of the art.

Section 3.1 provides a historical perspective of developments in quality assurance, showing how the policy thinking developed through the Bologna Process and how reality evolved in the different countries. It discusses and explains the importance of the quality assurance debate to the conception of the European Higher Education Area (EHEA) and highlights the key policy messages that have been formulated in different Communiqués.

Section 3.2 provides an update on the main qualitative indicators that have been developed to assess progress in meeting quality assurance policy objectives.

Section 3.3 provides a historical perspective of the evolution of recognition policy throughout the duration of the Bologna Process.

Section 3.4 provides an update of the main qualitative indicators that have been developed to assess progress in meeting recognition policy objectives.

The 2018 Paris Communiqué

The 2018 Paris Communiqué stresses the key relevance of quality assurance in 'developing mutual trust as well as increasing mobility and fair recognition of qualifications and study periods throughout the EHEA (p. 1). The national governments appreciate the progress that has been made with regards to implementing the ESG and seek to promote joint degrees and therefore also the 'European Approach for Quality Assurance of Joint Programmes' (p. 2). They seek to also promote the development of the 'Database of External Quality Assurance Results' (DEQAR) (p. 2).

Key messages

- The development of higher education quality assurance systems has been one of the most significant features and drivers of change in the EHEA.

- While the conditions for trust throughout the EHEA have been established, reluctance to trust qualifications in some other systems remains.

- Although the overarching legal framework for recognition was established prior to the Bologna Process, some recognition practice today still falls short of requirements.

3.1. History of progress and challenges in Quality Assurance in the European Higher Education Area

3.1.1. Quality Assurance in Europe before the Bologna Process

Many factors and common trends have shaped the development of quality assurance within the Bologna Process. Globalisation, overall expansion in numbers of students and higher education institutions, the changing economic context bringing constraints on government expenditure and demands for more public accountability have been major drivers in the development of external quality assurance mechanisms. The increase in the mobility of individuals, supported by the cooperation and consolidation among European universities and the perceived quality of the 'imported' and 'exported' higher education degree became an issue of interest in sending and receiving countries alike. This has further raised the discussion on external evaluation systems.

The primary aim of introducing quality assurance mechanisms across Europe was to ensure confidence in the quality of educational provision, providing reassurance that standards of awards are being safeguarded and enhanced, and ensuring a valuable return on the public investment in higher education. According to Frazer's survey (1997) of 38 European countries, the most significant response was related to accountability – 'to make higher education institutions more accountable to its stakeholders' followed by enhancement – 'to assist higher education institutions in making improvements' (including teaching, learning, scholarship, research, and service to the community). When it comes to the establishment of national quality assurance agencies, a number of different reasons were mentioned: from a stated purpose of 'international comparability and student mobility' (Bulgaria, Poland, Romania and Slovenia), to the aim of 'increased higher education institution autonomy' (Czechia, Hungary and Romania), 'expansion/diversification/control of private higher education institutions' (Bulgaria and Romania), and 'resource constraints' (Bulgaria and Romania) (Temple, P. and Billing, D., 2003, p. 243).

The accountability expectations of higher education institutions were closely related to the level to which each institution was able to direct its own educational processes. Higher education institutions in most systems operated on the assumption that they enjoyed a large degree of autonomy in their decision-making. Introducing accountability measures through external quality assurance could, however, reduce autonomy from institutions that already benefitted from a high degree of autonomy. At the same time, in systems where institutions had little autonomy quality assurance could lead to increased autonomy.

Development of national approaches to Quality Assurance

Before 1990, only four countries had an external quality assurance model in place (Denmark, France, the Netherlands and the United Kingdom). This consisted of an independent quality assurance agency, working on the basis of a self-assessment report; an on-site peer review visit; and a final report. A few other countries (Finland, Norway and Lithuania) at that time were either contemplating the idea of establishing a quality assurance system of their own or were engaged in setting up processes of establishing policy structures and evaluation criteria and determining the main purpose of their internal and external quality assurance activities (Huisman J., 2019, p. 1).

After 1990, quality assurance systems across Europe started to develop using different models and approaches. In Western European countries, the tendency was towards a more self-regulatory approach, while a more centralised and prescriptive model was used in most Central and Eastern European countries (Van Bruggen et al., 1998, p. 155).

The 1990s were at the same time marked by significant structural reforms, in particular by the transition from a centralised model to a more autonomous open and free higher education system, in particular in the Central and East European countries. The support from the EU's Multi-Country PHARE programme ([24]) was instrumental in these reforms including the introduction and improvement of quality assurance activities in universities e.g. in Hungary ([25]). Most of the implementation related to quality assurance was however in its initial phases and limited mainly to the introduction of some higher education reforms.

In establishing quality assurance evaluation methods, national systems adopted specific approaches reflecting their national strategy for higher education. Some countries preferred accreditation with varying references to evaluation or improvement aspects (e.g. Poland and Spain) while other countries instead opted towards improvement-oriented quality assurance without accreditation (Lithuania). In the United Kingdom, the Further and Higher Education Act 1992 set up the Higher Education Funding Council for England (HEFCE) had amongst its other duties, 'to secure that provision is made for assessing the quality of education'. In Austria, the University Organisation Act of 1993 introduced for the first time a systematic and comprehensive evaluation programme assessing the quality of teaching and instruction. In 1990, Poland already had a number of peer accreditation commissions, set up independently by the academic community to conduct programme evaluations on the basis of applications submitted voluntarily by higher education institutions. However the establishment of a quality assurance agency came a decade later, in 2002. In 1993, Romania also took the first steps to founding its quality assurance system through a law concerning accreditation of higher education institutions and diploma recognition.

Development of a European approach to Quality Assurance

The early developments in external quality assessment within Europe were stimulated and advanced by a number of international programmes usually in the context of a pilot project, as a 'stand-alone' initiative or inter-linked with other reforms. Examples include the European Pilot Project for Evaluating Quality in Higher Education of 1995, the pan-European survey of the processes and policy issues of academic quality assessment and accreditation in 38 countries and other bilateral projects sponsored by the European Union.

The Institutional Evaluation Programme launched in 1993 by the Standing Conference of Rectors, Presidents and Vice Chancellors of the European Universities (CRE) – now the European University Association (EUA) – offered external evaluation mainly to EUA member institutions. The programme, which still operates today, specifically focused on assessing how institutions deliver on their mission.

While national developments were taking place, the initial foundations towards a European dimension of quality assurance were also being laid by the European Commission, which funded a number of pilot evaluation projects in European member states and associated the European Free Trade Association (EFTA) countries in the early 1990s. The results of these pilot projects set out the principles underpinning the key methodological features of today's European guidelines for quality assurance, in particular referring to the introduction of a self-evaluation, peer-review visit, the publication of reports and the independence of quality assurance agencies.

The European pilot projects also lead to an increase in cooperation among European quality assurance systems followed by the adoption of the European Council recommendation of 1998 on the development of European cooperation and networking in quality assurance in higher education (98/561/EC). The discussions on developing a network for cooperation initiated during the pilot

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[24]   The PHARE programme was directed towards the 12 Central and East European countries including Poland, Bulgaria, Hungary, Lithuania, Latvia, Estonia, Czechia, Romania, Slovakia, Slovenia, Albania, Bosnia and Herzegovina, and North Macedonia.

[25]   https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2015/20150806-phare-ex-post-evaluation-final-report.pdf p. 152

projects by different national authorities and quality assurance agencies (including those operating at state and regional level) came to fruition a few years later in March 2000, when quality assurance agencies together with governmental representatives (ministries of education who were responsible for external quality assurance at that time) and other stakeholders formed the European Network for Quality Assurance (ENQA).

3.1.2. Quality Assurance in the Bologna Process

The importance given to quality assurance in the Bologna Process, while not fully defined as a policy objective in its early days, has gained more clarity and prominence throughout the ministerial communiqués.

1999-2004: The early years for Quality Assurance in the Bologna Process

The initial commitment made within the Bologna Declaration (1999) set out the first intentions related to quality assurance, encouraging the cooperation of European countries in quality assurance of higher education with a view of developing comparable criteria and methodologies.

The evolving ministerial communiqués aimed at further strengthening trust between systems, and quality assurance was seen as one of the main tools to achieve this. The Prague Communiqué (2001) not only emphasised the necessity of achieving mutual trust between higher education systems but also underscored the mutual acceptance of evaluation and accreditation mechanisms, and the role of quality assurance in recognition.

One of the grounding principles in the development of European quality assurance is institutional autonomy, which was emphasised by ministers in the Berlin Communiqué (2003), recognising that 'the primary responsibility for quality assurance in higher education lies with each institution itself'.

In order for quality assurance to become a success, sustained support from the key EHEA stakeholders was needed. With the Prague Communiqué (2001), the role of stakeholders was more clearly defined and a further recognition of the role of stakeholders in quality assurance was marked with the Berlin Communiqué (2003), when ministers called upon the E4 stakeholders ([26]) to develop an agreed set of standards, procedures and guidelines on quality assurance.

Reflecting on the early achievements in quality assurance in the Bologna Process, it is worth looking at the initial quality assurance indicators developed for the process. These were intended to measure progress and to stimulate the transformation of the commitments into practice at national level (Stocktaking report, 2005). Based on the first two Communiqués after the Bologna Declaration (Prague 2001, Berlin 2003) the indicators looked at the stage of development of quality assurance systems. They focused on the key elements of the evaluation systems (internal and external quality assurance), the level of participation of students in quality assurance, the level of international participation as well as the level of co-operation and networking in quality assurance.

On the basis of the information countries provided in their national reports, the participation of students in quality assurance processes and international participation in quality assurance were areas that recorded the least progress. The involvement of students in the governance of national bodies for quality assurance, within teams for external review, as part of the consultation or involvement during external reviews, was far from being achieved, with only three countries reporting that this was ensured (Norway, Sweden and the United Kingdom – Scotland) (Stocktaking report, 2005). EUA's

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([26])   E4 was the name given to meetings of the European Network of Quality Assurance in Higher Education (ENQA), the European University Association (EUA), European Association of Institutions in Higher Education (EURASHE) and the National Unions of Students in Europe (currently the European Students' Union – ESU).

Quality Culture Project (2006) ([27]) also found that student participation in decision-making bodies was often relatively low and that higher education institutions did not show any strong resolve to increase participation in a significant way. The most common forms of student involvement included filling out teaching evaluation forms and participating in decision-making bodies. Romania was, however, another early adopter of student involvement, with a 2005 decree focusing on student involvement in internal quality assurance processes.

International participation in quality assurance was also at an early stage of development, with only a few countries in the dark green category (Netherlands, Norway, Switzerland and the United Kingdom). The main criteria for the indicator at that time referred to whether international participation was ensured in the governance of national bodies for quality assurance, in the review teams for quality assurance and whether they were members of ENQA or other international networks (Bologna Process Stocktaking report, 2005).

The picture of a European higher education system with operational quality assurance agencies begins to emerge from 2003. The external quality assurance systems start to witness a widening in the scope of quality assurance, with a greater focus on accountability as an objective of the performed activities, followed by an increasing trend for quality assurance agencies to operate both at institutional and programme level (ENQA, 2003). This meant that the European standards for quality assurance that were in development at that time had to be sufficiently generic and adaptable to the various political, national and cultural contexts, while respecting system level and institutional diversity.

At the same time, the European Network for Quality Assurance (ENQA) was in the process of reviewing its criteria for membership. It transformed in 2004 into the European Association for Quality Assurance in Higher Education (ENQA), no longer including national governments or stakeholders as part of its new structure. As an association, ENQA went beyond the activities of the former network, which were mainly focused on exchange of experience, and developed as a voice of quality assurance agencies within the European Higher Education Area (EHEA).

2005-2007: The development of a Quality Assurance framework

At their Ministerial conference in Bergen (2005), ministers adopted the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), prepared by the E4 group (ENQA, ESU, EUA and EURASHE). They also welcomed the concept of a European register of quality assurance agencies. Both the ESG authors and European ministers of education saw a need for an official European register that could enforce the European framework for quality assurance. The concept of a register had already been discussed in the original report of the E4 Group on the proposal of the ESG (ENQA, 2005) and included in the European Parliament and Council Recommendation on further European cooperation in quality assurance in higher education (2006/143/EC) ([28]).

Two years after the adoption of the ESG, at the Ministerial summit in London (2007), Ministers welcomed the establishment of a Register as proposed by the E4 Group. The operational model proposed had at its core an independent group of experts – the Register Committee – nominated in their personal capacity. The role of the Register Committee was to jointly decide on the substantial compliance with the ESG of quality assurance agencies accepted on the Register. The European Quality Assurance Register for Higher Education (EQAR) was eventually founded in March 2008 by the E4 Group.

The European governments, the founding members (the E4) and Bologna social partners became the members of the General Assembly. Membership has grown steadily over the last 12 years to include

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[27]   See https://eua.eu/resources/publications/656:quality-culture-in-european-universities-a-bottom-up-approach.html

[28]   See https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex %3A32006H0143

the majority of the EHEA countries (40 countries out of 48 in 2019). The organisational separation of the Register Committee from the members of the EQAR Association allowed the Register to function completely independently.

The establishment of quality assurance agencies operating within the EHEA countries was increasing. 22 countries had national/regional agencies for quality assurance, with half of these being set up between 2005 and 2010 (European Commission/EACEA/Eurydice, 2012, p. 60), and it was expected that they would align their standards and process to the ESG and thus contribute to ESG implementation.

An indicator on the overall implementation of the ESG was first considered as part of the 2007 stocktaking report, before the establishment of the EQAR. Given that the criteria for ENQA membership required compliance with the ESG, the Stocktaking reports at that time looked at national quality assurance agencies that have become members of ENQA, while at the same time recognising that 'in the future it is likely that inclusion of the national quality assurance agency or agencies in EQAR will be the main indicator of the credibility of a QA agency' (Bologna Process Stocktaking Report, 2009, p. 65). The 2007 stocktaking report indicated that 17 countries have reported that they already had a fully operational national quality assurance system in line with the ESG. Four other countries indicated they were in the process of implementing such a system. In many cases, this result might have been more an indication of a country's aspiration than the actual implementation of the ESG, as the Bologna Process Implementation Reports revealed in the following years.

Quality assurance implementation at institutional level was initially slow to emerge, but became more visible, following in particular the adoption of the ESG (Bergen 2005). Slightly over half (52 %) of the EUA surveyed institutions responded that they had started working on a systematic approach to internal quality assurance after 2005, following the adoption of the ESG, and about two thirds of higher education institutions designed their quality assurance framework for teaching and learning specifically following national frameworks and guidelines (Loukkola, T. and Zhang, T. 2010, p. 23).

The introduction of internal quality assurance in some universities was often based on the replication of the model developed by other well-established higher education institutions. As a result this led to higher education internal quality assurance systems being dominated by a similar model. Another issue in the move towards the implementation of internal quality assurance arrangements within higher education institutions was the lack of genuine engagement, as quality assurance processes were at times only deployed during the preparation of their external evaluation and lacking the necessary engagement and support from their higher education community (Matei, L. and Curaj A., 2014, p. 114).

2008-2014: The consolidation phase of the Quality Assurance framework

As the initial communiqués set out the first intentions and clarified the scope and standards of quality assurance, the following communiqués recognised the greater compatibility and comparability across European higher education systems and therefore further emphasised a closer integration and consolidation of the quality assurance framework.

At the Leuven and Louvain-la-Neuve Conference (2009), the ministers asked the E4 Group to continue its cooperation in further developing the European dimension of quality assurance and to ensure that the EQAR is evaluated externally. In the further implementation of the ESG, the ministers asked for particular attention to be paid to the teaching quality of higher education study programmes at all levels. Additionally, the Leuven and Louvain-la-Neuve Communiqué acknowledged the use of multidimensional transparency tools in higher education and asserted that such tools should closely relate to the principles of the Bologna Process and in particular, quality assurance and recognition. However, caution has been called upon transparency tools, such as rankings or classifications, as

they could foil the enhancement-driven aspect of quality assurance in higher education by stifling self-critical reflection ([29]).

A further addition within the Leuven and Louvain-la-Neuve Communiqué concerned transnational education provision, which should also be considered within the scope of the ESG and in line with the UNESCO/OECD Guidelines for Quality Provision in Cross Border Higher Education. These guidelines, which were already developed in 2005, came to emphasise mutual trust and recognition between countries involved in cross-border higher education.

Marking the launch of the European Higher Education Area (EHEA), the Budapest-Vienna Declaration (2010) recognised that while much had been achieved, reforms were implemented to varying degrees. The declaration expressed the need for further consolidation, as Ministers re-committed to the full and proper implementation of the agreed Bologna reforms, including those related to quality assurance.

While there had been progress recorded across the board in quality assurance, the establishment of a genuine quality culture in higher education institutions was still in development in most higher education systems. The ESG (2005) defined the areas which should be covered by institutional quality assurance arrangements in teaching and learning, but the standards did not define how these activities were to be implemented. The formal external quality assurance mechanisms were not sufficient for stimulating significant quality improvement and transformation at the level of higher education institutions and in particular in areas of teaching and learning. The reward for formalism and compliance, trying to accommodate institutional processes to formal external requirements resulted in the transformation, in some cases, of internal quality assurance processes into a bureaucratic exercise (Loukkola and Zhang, 2010, p. 36, 39)

A number of European Commission – funded projects led by stakeholders and higher education institutions, came to support the development of internal quality assurance processes. The EUA 'Examining Quality Culture in Higher Education Institutions (EQC)' projects (2010-2012) revealed the complexity of the framework in which internal quality assurance processes operate and highlighted aspects that should be considered in the development of a quality culture. Notably they drew attention to the consideration of other possible developments in higher education, to reviewing external regulations, financial constraints, and to addressing the potential reluctance from the higher education institution's community itself. The EUA project 'Promoting Quality Culture in Higher Education Institutions – PQC' (2012) ([30]) brought together the higher education institutions to take hold of the quality concept, discuss it, define it and shape the processes that will contribute to institutional improvement and effectiveness. The EUA EUREQA project (2012-2015) ([31]) provided capacity-building activities and supported higher education institutions in the Western Balkans in producing action plans for their internal quality assurance systems.

When it comes to overall student participation in quality assurance processes, the Stocktaking report (2009) indicators showed that while progress was achieved after 2007, a number of gaps still remained. Notably students often participated in reviews only as observers, were not always involved in preparing the self-assessment reports and were seldom involved as stakeholders in external quality assurance bodies. ESU's 2009 Bologna with Students Eyes report further showed that students' participation as equal partners in internal and external quality assurance processes was limited as they often faced reluctance towards their involvement in the decision-making processes. (European Students' Union, 2009, p. 9) Though the ESGs encouraged the participation or involvement of students in different internal and external quality assurance processes, the result was that student

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([29]) See, for example, comments by ENQA President Achim Hopbach, at the 2010 Ministerial Conference, Budapest/Vienna: https://enqa.eu/wp-content/uploads/2013/06/BMAC_ENQA_Achim_Hopbach.pdf

([30]) See https://enqa.eu/index.php/promoting-quality-culture-in-higher-education-institutions-pqc

([31]) See https://eua.eu/101-projects/572-eureqa.html

participation only became relevant and encouraged (when implemented) in those specific areas of quality assurance where it was explicitly mentioned in the ESG (ESU Consultation Report of the MAP-ESG Project, p. 6).

Meeting the criteria for the indicator on international participation in quality assurance (participation in governance bodies, review panels, agencies as members of ENQA or other international networks) became more challenging after 2007 with fewer countries falling into the green and light green categories. While progress was reported in 2009 with 16 countries placing themselves in the dark green category of the indicator, in 2012 this number dropped to only 8 countries. The reason for this decrease can be attributed to a change in the indicator (introducing the requirement of EQAR listing/ ENQA membership, and the requirement of international peers/experts participating in follow-up procedures), as well as to a change in reporting methods – from the national reporting used in the stocktaking reports until 2009 to the BFUG survey used in the Bologna implementation reports after 2010. One notable aspect of the indicator is that countries outside the European Union were faring significantly worse than those within the European Union.

Nonetheless some progress was notable, especially with regard to the participation of international experts in external review teams (as part of the ESG implementation). ENQA's internationalisation study (2015) further confirmed these trends, indicating that the most common practice in internationalisation of quality assurance agencies was their participation in international networks and cooperation with international partners, followed by the inclusion of foreign experts in review panels. The diversity of internationalisation activities undertaken by different agencies indicated that there was not yet a single, shared profile for the internationalisation of quality assurance.

Over time, as new quality assurance agencies have been established across the EHEA, the sophistication and variety of instruments used to measure quality has increased. Many agencies have tried several different types of procedures – single programme evaluations, clustered evaluations, audits of quality systems, departmental reviews and institutional reviews. Two surveys carried out by ENQA four years apart (in 2008 and 2012) showed that quality assurance agencies had been diversifying their approaches, most of them indicating that they had changed their quality assurance approach or that they were planning to introduce major changes in their external quality assurance procedures. These changes mostly concerned whether quality assurance agencies would be opting for an institutional or programme level type of assessments (or both) and which method they would be employing for their quality assurance assessments i.e. evaluation, accreditation or audit. In 2012, the vast majority of quality assurance systems focused on a combination of institutional and programme-level reviews (24) rather than on only programme (7) or institutional (4) assessment (European Commission/EACEA/Eurydice, 2012).

While EQAR was set up to be the EHEA's official register of quality assurance agencies that comply with the ESG, the reference to the Register within the monitoring of ESG implementation only began once the Register had sufficiently grown. In March 2009, EQAR had only listed three quality assurance agencies, but the list grew to 14 quality assurance agencies by the end of that same year. The list of quality assurance agencies accepted on the Register continued to increase, and by January 2012, 28 agencies based in 13 of the EHEA countries were registered, following a keen interest from quality assurance agencies from across the whole EHEA. There were also a few cases of interest from beyond the EHEA, but no applications were successful.

Considering the changes in the European quality assurance landscape, the creation of EQAR with its specific mission and use of the ESG as a compliance tool have all brought additional pressure to bear in considering whether the ESG could serve the purpose for which the document had been developed. As a result, an in-depth analysis of the impact of the ESG was carried out by the E4 Group in the context of the 'Mapping the implementation and application of the ESG' project, gathering information

on how the ESG had been implemented and applied in the Bologna signatory countries (ENQA, 2011). The results of the MAP ESG project showed that ESG had an impact on the development of quality assurance processes at institutional and national level across the EHEA and that they facilitated a shared understanding of quality assurance amongst relevant stakeholders and actors in higher education. Nonetheless a number of shortcomings were identified in the clarity, applicability and usefulness of the ESG. In the Bucharest Communiqué (2012), the EHEA Ministers acknowledged the concerns related to the implementation and application of ESG 2005 and mandated the E4 Group, in cooperation with Business Europe, Education International and EQAR, to prepare a revised proposal of the ESG.

EQAR gained further recognition within the EHEA through demonstrating its successful operation – including through an external review in 2011, and by the keen interest of quality assurance agencies applying for registration. At the Bucharest Ministerial conference (2012), ministers therefore agreed to 'allow EQAR-registered agencies to perform their activities across the EHEA, while complying with national requirements' (Bucharest Communiqué, 2012). This meant that countries were committed to trust the reviews carried out by ESG-compliant quality assurance agencies, but that quality assurance agencies may be expected to adapt their procedures when carrying out reviews within specific countries. The intention was that by recognising accreditation, evaluation or audit by a non-national quality assurance agency, based on the same common standards defined in the ESG, this would remove the unproductive duplication of efforts, and fatigue generated when both a national and a foreign agency reviews the same programme or institution, asking sometimes the same questions, even if for a different purpose.

In reviewing the cross-border quality assurance activity of EQAR-registered quality assurance agencies, the RIQAA (2014) project ([32]) revealed that about half of the listed quality assurance agencies at that time had carried out reviews across borders and that this was a growing development. The EUA Trends report (2015) further noted that cross-border external quality assurance had become increasingly popular across the EHEA, a manifestation of higher education institutions' international aspirations and also a recognition of their wish to be evaluated in different ways. These reviews were however mostly voluntary reviews that came in addition to, and as such remained separated from, the national systems of quality assurance. In addition, no real major developments had taken place between 2012 to 2015 in opening up national systems to EQAR-listed quality assurance agencies (with the exception of two countries, Armenia and Austria). The countries that were willing to enable their higher education institutions to undertake evaluations with a foreign agency mostly decided to do so prior to 2012. National responsibility for quality assurance could be perceived to be challenged by cross-border quality assurance, and some countries were therefore hesitant to recognise reviews from non-national agencies, perhaps particularly in systems where the main outcome of quality assurance is a decision granting permission to institutions or programmes to operate.

2015-2019: The further development of the Quality Assurance framework

At the Yerevan Conference (2015), EHEA ministers for higher education adopted the revised version of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and reiterated their earlier commitment to 'enable our higher education institutions to use a suitable EQAR registered agency for their external quality assurance process, respecting the national arrangements for the decision making on QA outcomes'. The Ministers also declared their intention to 'actively involve students as full members of the academic community, as well as other stakeholders, in the curriculum design and in quality assurance'.

([32]) Recognising International Quality Assurance Activity in the European Higher Education Area (RIQAA), project co-financed with help from the European Commission's Lifelong Learning Programme, and implemented by EQAR in 2014.

Through the Yerevan Communiqué (2015), ministers also adopted the European Approach for Quality Assurance of Joint Programmes, that had been developed to create an integrated approach for the quality assurance processes of joint programmes.

With the adoption of ESG 2015, the 'EHEA model' for quality assurance became more consolidated, clear and visible. The 2015 version of the ESG brought a number of 'technical' improvements with significant changes to the standards and guidelines for internal quality assurance outlined in Part 1. These changes have now better equipped the ESG to adapt to new developments in the EHEA including new modes of learning, links between quality assurance and qualification frameworks (QF-EHEA) and learning outcomes (standard 1.2), and a stronger emphasis of the students' active role as co-creators of their learning processes (standard 1.3). The scope of quality assurance has also widened – as ESG 2015 is embracing not only teaching and learning, but also responds to the increased internationalisation of higher education, the spread of digital learning and new forms of delivery and recognition of competencies gained outside formal education.

However, following the Yerevan Communiqué, little progress could be noted in terms of ESG implementation – at least on the basis of evidence provided for the next Bologna Process Implementation Report. This was partly due to the time necessary for quality assurance agencies and higher education institutions to implement the new version of the ESG. Therefore, at the Paris Ministerial meeting (2018), signatories of the Communiqué further pledged to remove the remaining obstacles to the implementation of the ESG in their national legislations and regulations and to enable and promote the use of the European Approach for Quality Assurance of Joint Programmes. With a view to enhanced transparency in quality assurance, ministers further welcomed the Database of External Quality Assurance Results – a tool meant to facilitate the access to reports and decisions on higher education institutions and their programmes externally reviewed against the ESG by an EQAR-registered agency.

While the Bergen, London and Yerevan Communiqués marked the main milestones in terms of the development of the quality assurance infrastructure within the EHEA, the Paris Communiqué has coalesced these pledges into one key commitment of 'quality assurance in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area'. To ensure implementation, a structured peer support approach was created, where governments and stake-holders could meet, discuss their action plan and share practices in enacting this key commitment.

The way quality assurance processes have been implemented in all Bologna signatory countries is reflected in the different approaches towards the design of internal quality assurance systems. The EUA's Trends survey showed that by 2015, the vast majority (87 %) of institutions had a QA policy in place. These results indicated that higher education institutions have undertaken activities to develop their internal quality assurance processes, but the results did now show whether these policies have been made part of the institutions' strategic management, a requirement now part of standard 1.1 of ESG 2015. A focus group result (EQUIP Study, 2018) carried out with higher education institutions showed that while in some cases institutions aligned their internal quality assurance system with strategic management, defining the role of quality assurance to the achievement of institutional goals, in other cases, internal quality assurance was specifically linked to defining and assessing the learning outcomes of programmes and ensuring these are aligned to the national qualification frameworks.

The existing legal frameworks may in some cases make it difficult or impossible for quality assurance agencies to comply with the ESG. In cases where agencies have a limited involvement in determining the criteria they work with, they may have troubles meeting the requirement of ESG 2.2 Designing methodologies fit for purpose, as this is already defined in detail by the legal framework or by the ministry. Compliance with ESG 2.7 Complaints and appeals, is difficult for some agencies as the appeal system is regulated by the ministry and does not fall under the agency's own responsibility. In

some higher education systems, the legal framework implies that reports can only be published (ESG 2.6 Reporting) with the express permission of the institution in question, therefore making it hard for agencies to publish all reports, especially those with a negative outcome. Ministries, signatories of the Bologna Process commitments, were nevertheless expected to ensure that legislation is not a barrier to implementing the ESG and thus ensure that quality assurance agencies can meet the expectations of compliance for EQAR registration.

In parallel to the implementation of the ESG 2015, a number of changes took place within different higher systems as countries were (re)defining their external quality assurance framework e.g. transitioning from institutional accreditation to institutional audit (Germany 2018, Portugal 2017), changing from programme accreditation to institutional accreditation (Denmark 2017, Belgium – Flemish Community 2017) or the opposite, from an institutional evaluation to programme accreditation (Poland 2017). There were not only major changes in the external quality assurance system, but also in the way higher education institutions had to handle their own internal quality processes. The choice of external quality assurance requirements for both programmes and institutions in some countries depends on the type of the higher education institution. For example, in Ireland, independent higher education providers need to have delegated authority to deliver degrees (self-awarding power) otherwise they are required to undergo programme validation, in addition to an institutional review. Similarly universities of applied sciences and private universities in Austria are also required to undergo programme and institutional evaluations while public universities undergo only audit procedure.

The purposes in quality assurance have further diversified with an increased offer in quality assurance approaches by quality assurance agencies, which range from evaluations, accreditations, certification, audits, authorisation, reviews, and the offer of the European Approach of Quality Assurance of Joint Programmes. A look at external quality assurance activities carried out or 'on offer' by the 49 EQAR registered quality assurance agencies indicates that 25 % of quality assurance agencies have between one to three forms of evaluation, while 30 % of registered quality assurance agencies conduct from 9 to 15 types of reviews. There are over 300 external quality assurance activities on offer by agencies registered in EQAR. Overall, this picture suggests that the evaluation instruments of quality assurance agencies and by extension the quality assurance systems where they operate, are more complex and diversified than ever. While progress towards convergence has been made in the basic methods and procedures among quality assurance agencies (self-evaluation, publication of reports and criteria for evaluation), the diversity in the forms and types of activities carried out has become a feature of the European quality assurance framework.

Considering the developments in allowing higher education institutions to choose a suitable EQAR – registered agency the 2018 Bologna Process Implementation Report showed some important developments in the map of countries moving to the dark green category of the scorecard indicator. While by the end of 2017, 26 of the signatory EHEA countries have put in place legislative provisions to allow (all or some) higher education institutions to request accreditation, evaluation or audit from a foreign quality assurance agency, only 16 countries made a specific reference to using a suitable EQAR-registered, ESG-compliant agency and thus make full use of the established European framework for quality assurance. The remaining countries have created their own, specific framework or requirements (EQAR Annual Report, 2018, p. 13-14).

The analysis of responses on the activity of EQAR-registered agencies from 2014 to 2018 shows that the spread of cross border quality assurance activities covered almost all of the EHEA. Two thirds of EQAR-registered quality assurance agencies reported to have carried out at least one form of evaluation or accreditation activity across borders. Within the EHEA, most of such reviews are carried out in countries that recognise the activity of EQAR-registered agencies (i.e. Romania, Kazakhstan, Switzerland, Luxembourg and Germany). The results consistently show that cross-border external quality assurance activities are carried out most often in countries that recognise the activity of EQAR-

registered agencies as part of the regular quality assurance at programme and/or institutional level, although voluntary external quality assurance activities (not recognised as part of the national mandatory external quality assurance system) persist to a considerable extent.

While there is growing interest in cross-border quality assurance, there are still challenges when operating within different higher education contexts i.e. adapting criteria to specific national regulations, selecting a quality assurance agency fit for purpose, preparing the review documentation, meeting the requirement for the formal recognition process, etc. Considering these matters, ENQA, ESU, EUA, EURASHE and EQAR set up in 2016 an ad-hoc working group and developed a set of (non-binding) key considerations for cross-border quality assurance ([33]) to guide stakeholders engaging in cross-border QA.

The possibility for higher education institutions to use one single integrated procedure in accrediting their joint programme procedure and thus remove the burden of multiple accreditation procedures (European Approach for Quality Assurance of Joint Programme, 2015) has also been a quality assurance commitment that has so far shown little progress. The pre-condition for its use is that EHEA countries allow so in their national legislation, i.e. to recognise external quality assurance in line with the European Approach as sufficient to fulfil the external quality assurance obligations. Despite the fact that joint programmes have long been celebrated as a hallmark of the EHEA, quality assurance of these programmes has tended to be a complex and troublesome issue, especially in countries with obligatory programme accreditation (see Ad-Hoc Expert Group, 2014).

Whereas 'self-accrediting' institutions (i.e. those subject to external quality assurance at the institutional level only, e.g. in a regular audit) tend to have fewer difficulties, institutions from countries with obligatory study programme accreditation or evaluation often find themselves confronted with different (and sometimes even conflicting) formal requirements in the countries involved (idem). The European Approach is 'based on the agreed tools of the EHEA' (European Approach, 2015) and should be used 'without applying additional national criteria'.

According to the Bologna Process Implementation Report (2018), only two countries (Georgia and Slovenia) changed legislation to enable the European Approach to be used. Meanwhile, EQAR reported that the European Approach was only made available to all higher education institutions in 12 higher education systems, while in 13 other countries the procedure was available for some higher education institutions under specific conditions.

3.2. Qualitative indicators on state of play of Quality Assurance in the European Higher Education Area

3.2.1. Stage of development of external Quality Assurance

The development of quality assurance systems has been a striking phenomenon throughout the Bologna Process. Not only have systems developed rapidly, demonstrating consensus that quality assurance is necessary to ensure accountability and to support enhancement, but they have also followed Standards and Guidelines for Quality Assurance in the EHEA (ESG). Moreover, a European body – the European Quality Assurance Register (EQAR) – has been established to guarantee that the standards and guidelines are respected and implemented.

Scorecard indicator n°4 is designed to show how far quality assurance systems have developed in alignment with these agreed Bologna commitments. Systems in the dark green category are working
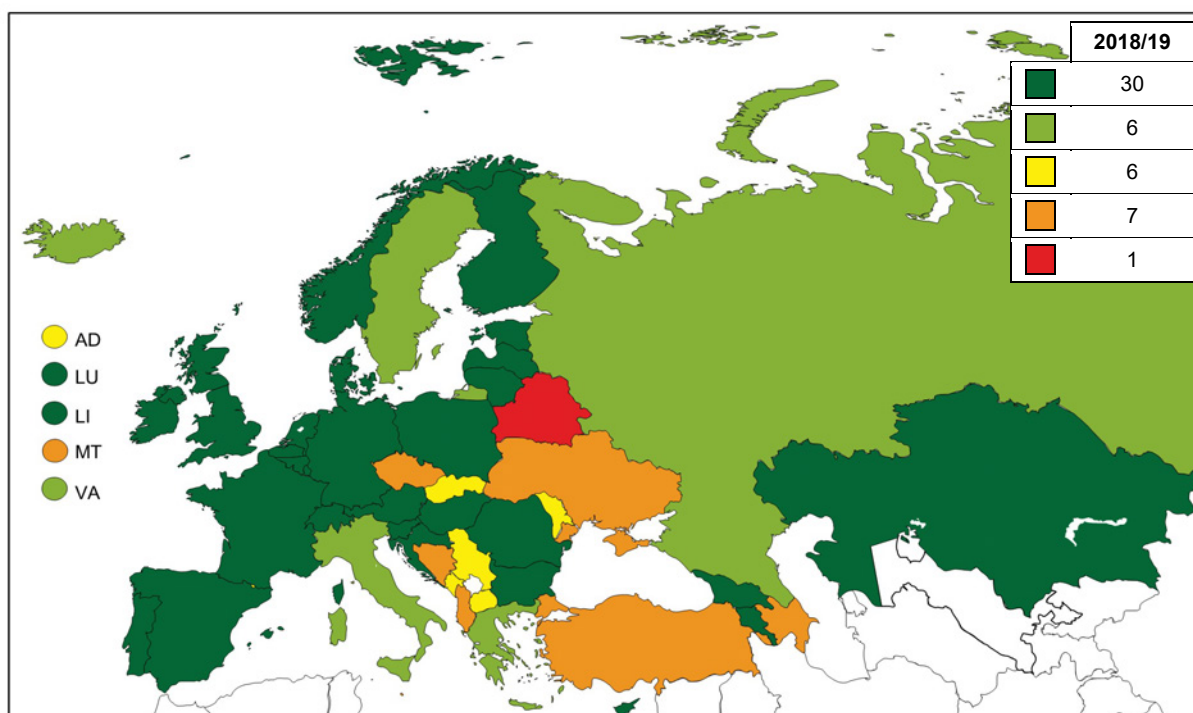

([33])   https://www.eqar.eu/kb/cross-border-qa/key-considerations/

with quality assurance agencies that have been evaluated to show that they are working in accordance with ESG, and this is demonstrably proven through registration on the EQAR. Countries in the light green category also operate a system with quality assurance agencies evaluated to ensure that they comply with the ESG, or declaring that they are fully aligned with the ESG. However, in this case they have not registered on the EQAR. The countries in yellow have only some higher education institutions or programmes required to undertake regular quality assurance procedures with an agency that works in compliance with the ESG. For those countries shown in orange, the quality assurance system has undergone no external evaluation to ensure compliance with the ESG. Countries in red have produced no evidence of having established a reliable quality assurance system.

Figure 3.1: Scorecard indicator n°4:
Stage of development of external Quality Assurance system, 2018/19

Source: BFUG data collection.

S c o r e c a r d   c a t e g o r i e s

![dark green]	A fully functioning Quality Assurance system is in operation nationwide, in which all higher education institutions are subject to regular external Quality Assurance by an agency that has successfully demonstrated compliance with the Standards and Guidelines for Quality Assurance in the EHEA (ESG) through registration on EQAR.
![light green]	A Quality Assurance system is in operation nationwide and is aligned to the ESG, but the agency/ies performing external Quality Assurance are not registered in EQAR.
![yellow]	A fully functioning Quality Assurance system is in operation nationwide, but only some higher education institutions are subject to regular external Quality Assurance by an agency that has successfully demonstrated compliance with the ESG through registration on EQAR.
![orange]	A Quality Assurance system is in operation nationwide, but has not (yet) been fully aligned to the ESG.
![red]	No Quality Assurance system is in operation.

The findings for this indicator confirm the trend to strengthen external quality assurance that has continued throughout the Bologna Process. 36 systems now find themselves in the dark or light green categories. Bulgaria, Hungary and Latvia have all recently had their national quality assurance agencies accepted into the EQAR.

A number of countries whose quality assurance systems have not fully aligned to the ESG are nevertheless making strong advances in this direction.

With regard to the 2018/19 reference year, Belarus provided no evidence of a quality assurance system. However, there is work in progress to develop an external quality assurance agency, and a 2020 work plan of the Ministry of Education (approved by the Minister of Education on 28 December 2019) indicates the task of drafting legal acts on the functioning of the new independent national quality assurance agency.
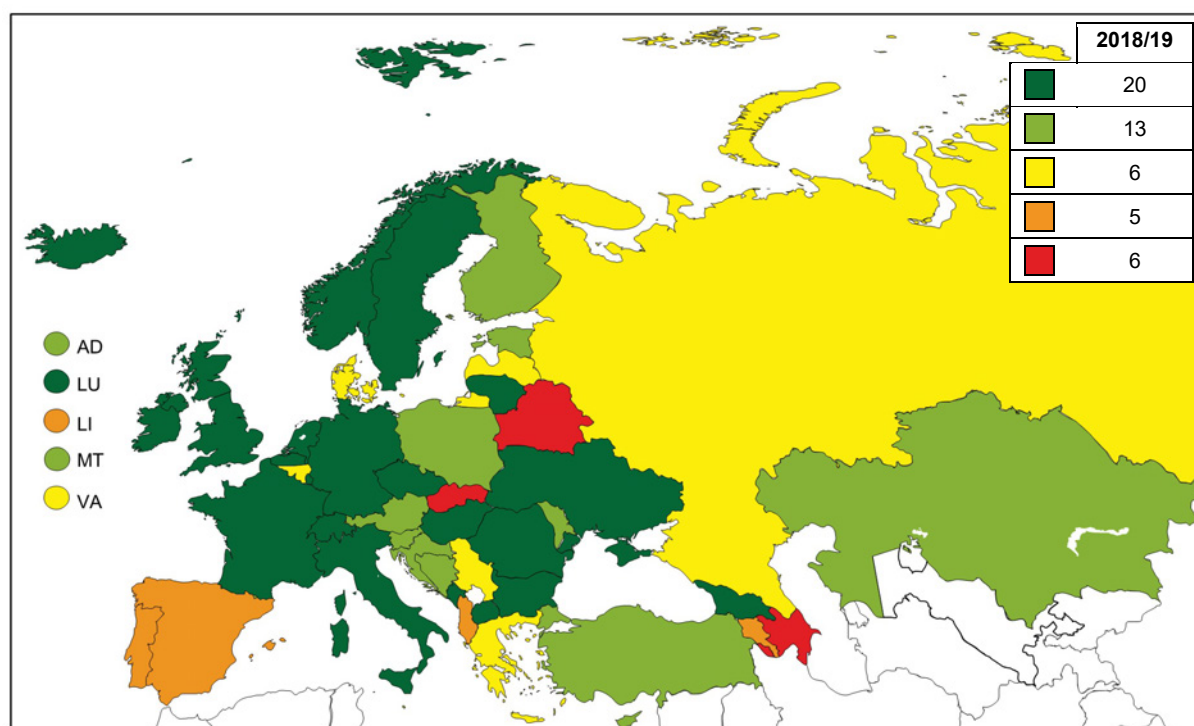
3.2.2. Student participation in external Quality Assurance

Participation of students in higher education governance is one of the fundamental values of the European Higher Education Area. Students should neither be, nor be perceived, as passive consumers of higher education programmes. Rather they should be actively engaged in all aspects of the learning process. This includes quality assurance, where the Bologna process has helped to establish a shared vision of students being involved in all key aspects.

Scorecard indicator n°5 gives an overview of the situation regarding student participation in external quality assurance.

Figure 3.2: Scorecard indicator n°5:
Level of student participation in the external Quality Assurance system, 2018/19

Source: BFUG data collection.

S c o r e c a r d   c a t e g o r i e s

■ (dark green)	In all quality assurance reviews, students participate as full members at five levels: ○ in governance structures of national Quality Assurance agencies; ○ in external review teams; ○ in the preparation of self-evaluation reports; ○ in the decision making process for external reviews; ○ in follow-up procedures.
■ (green)	Students participate at four of the five levels mentioned above.
■ (yellow)	Students participate at three of the five levels mentioned above.
■ (orange)	Students participate at two of the five levels mentioned above.
■ (red)	Students cannot participate or participate at only one level mentioned above.
□	Not available

The source of the information is ministries rather than students themselves. The indicator is built on the criteria of assessing student participation in external quality assurance reviews as full members at five levels – governance structures of national quality assurance agencies; in external review teams; in the preparation of self-evaluation reports; in the decision making process for external reviews and in follow-up procedures. These criteria are considered to be met only when student participation is compulsory, which in most systems is ensured through being specified in legislation.

Dark green signifies that student participation is ensured in all of these activities, while at the other end of the spectrum, red means that no student participation is guaranteed, or that it is ensured in only one area of activity.

The indicator shows that there remains room for improvement in the EHEA as a whole. Although there are now 20 systems in dark green and a further 13 in light green, this means that 17 systems are located in the yellow, orange or red zones. There is therefore still improvement to be made to meet the Bologna Process commitment to full student engagement.
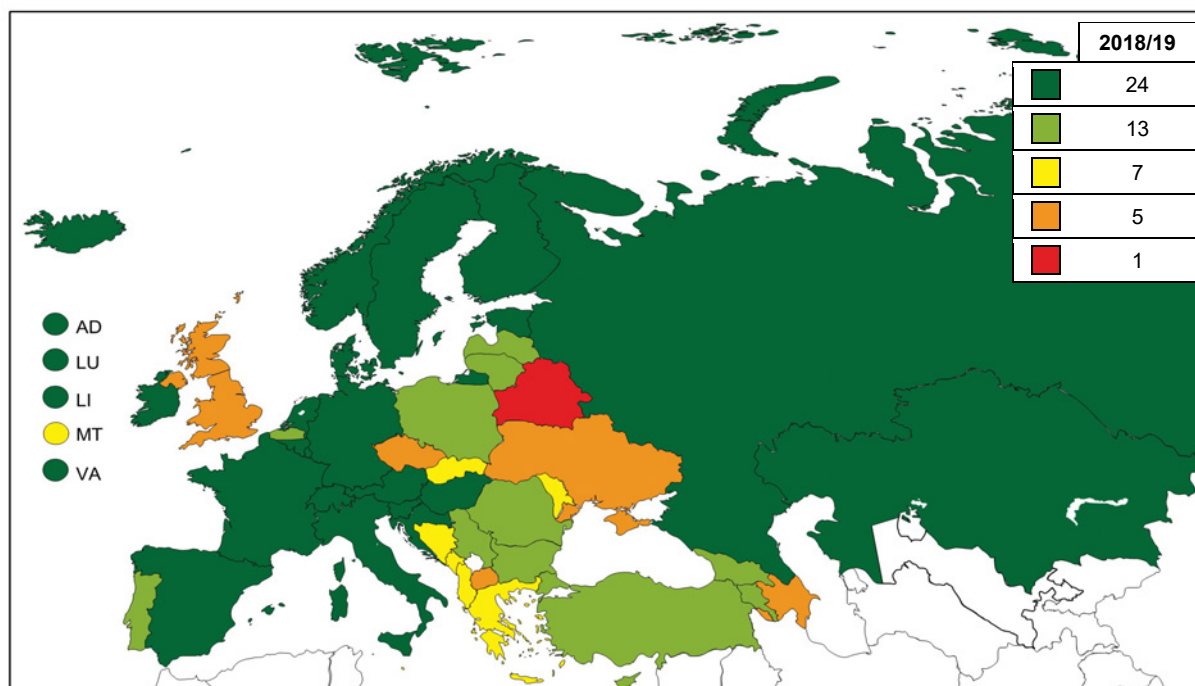
A number of countries report that student participation takes place even if it is not an official requirement. This is the case for Andorra and Switzerland, while Liechtenstein reports that the process follows ESG guidelines on student involvement and leaves quality assurance agencies to take responsibility for this themselves. Thus even if not specified as requirements in official documents or laws, student participation has evolved through the choices made by the quality assurance agencies and higher education institutions. Other countries are preparing legislative reform that will ensure student participation. Montenegro reports that, while current legislation does not require student participation in all aspects of external quality assurance processes, this is set to change in a future law.

3.2.3. International participation in national Quality Assurance systems

The impact of internationalisation can be perceived in a number of developments related to quality assurance, including cooperation between countries and quality assurance agencies in developing an overarching framework. Quality assurance systems can be designed to ensure that they draw maximum benefit from internationalisation, and one of the indicators that is most sensitive to these developments is Scorecard indicator n°6 on the level of international participation in external quality assurance.

This indicator considers four criteria. The first is that quality assurance agencies are members or affiliates of the European Association of Quality Assurance Agencies in Europe (ENQA). As section 3.1 outlines, ENQA is the major organisation representing quality assurance agencies in Europe, promoting exchange of information and good practice, carrying out ESG reviews and implementing projects to drive innovation in quality assurance and to take forward European cooperation. As such, participation in ENQA is a pre-requisite for engagement of European quality assurance agencies beyond national boundaries. Other criteria considered for this indicator are that international peers/experts participate in the governance of national quality assurance bodies, as members or observers in evaluation teams and in follow-up procedures. The condition for these criteria to be satisfied are that such participation is a required aspect of the system.

Source: BFUG data collection.

S c o r e c a r d   c a t e g o r i e s

	In all cases the following four aspects are met:
	o agencies are members or affiliates of ENQA;
	o international peers/experts participate in governance of national quality assurance bodies;
	o international peers/experts participate as members/observers in evaluation teams;
	o international peers/experts participate in follow-up procedures.
	Three of the four aspects are met.
	Two of the four aspects are met.
	One of the four aspects is met.
	No international participation

The number of countries that have reached the dark green zone has more than doubled from 11 systems in 2015 to the 24 systems now. This signifies the continuous trend towards embedding internationalisation requirements in national quality assurance systems. In addition 13 countries are now in the light green category. Meanwhile, seven systems are in yellow with two of the four criteria being met. Clearly internationalisation in quality assurance continues to grow quickly, including in countries where international engagement was previously not significant. Indeed, the number of countries shown in red or orange has dropped from 13 in 2015 to the current number of six.

3.2.4. Level of openness to cross border Quality Assurance of EQAR-registered agencies, 2018/19

One of the main benefits of quality assurance systems developing on the basis of common standards and guidelines is the strengthening of trust. An important measure of how far this trust extends is whether governments enable higher education institutions to be evaluated by a quality assurance agency from another country that works in compliance with the ESG. The European Quality Assurance Register (EQAR) exists as a clear mechanism to guarantee compliance with the ESG. Enabling cross border quality assurance in this way is thus a clear demonstration of commitment to European cooperation in quality assurance.

Scorecard n°7 shows whether, and to what extent, countries have taken action to facilitate cross border quality assurance by an EQAR-registered agency.

Figure 3.4: Scorecard indicator n°7:
Level of openness to cross border Quality Assurance of EQAR registered agencies, 2018/19

Source: BFUG data collection.

S c o r e c a r d   c a t e g o r i e s

🟩	**All institutions and programmes** can choose to be evaluated by a suitable quality assurance agency from outside the country to fulfil their obligations for external quality assurance, while complying with national requirements. EQAR registration always serves as a criterion for agencies to be allowed to carry out cross-border evaluation/accreditation/audit.
🟩	**All institutions and programmes** can choose to be evaluated by a suitable quality assurance agency from outside the country to fulfil their obligations for external quality assurance, while complying with national requirements. EQAR registration does not always serve as a criterion for agencies to be allowed to carry out cross-border evaluation/accreditation/audit.
🟨	**In some cases, institutions and/or programmes** can choose to be evaluated by a quality assurance agency from outside the country to fulfil their obligations for external quality assurance, while complying with national requirements. EQAR registration always serves as a criterion for agencies to be allowed to carry out cross-border evaluation/accreditation/audit.
🟧	Discussions are on-going or plans have been made to establish a legal framework allowing EQAR-registered agencies to operate in the country.
🟥	Institutions and programmes cannot be evaluated by quality assurance agencies from outside the country to fulfil their obligations for external quality assurance, and no plans are being discussed.

In the most positive situation (dark green), all higher education institutions and programmes can choose to be evaluated by an EQAR-registered agency outside the country to fulfil their obligations for external quality assurance. While at the opposite extreme (red), there is no possibility for any institution or programme to be evaluated by a quality assurance agency from outside the country as

part of the mandatory external quality assurance process. The other categories move from a planning phase (orange) to situations where some higher education institutions or programmes may be evaluated by an EQAR-registered agency from outside the country (yellow), and then for some or all cases but without EQAR registration being a criterion (light green).

The findings show that this remains an issue where country action is divided. 21 systems currently ensure that the commitment to cross border quality assurance is fully realised, and this reflects considerable progress. Indeed, it is more than twice as many systems as reported this situation in 2013/14. The countries that report recent steps to enable higher education institutions to be evaluated by an agency from outside the country are Azerbaijan, Bulgaria, Germany, Hungary, Latvia, Poland, Slovakia and Ukraine.

Another eight systems also enable their higher education institutions to choose to be evaluated by a quality assurance agency from outside the country, but these systems neglect the requirement that foreign agencies should be listed on the EQAR. Despite their commitment to using the EQAR to guarantee compliance with the ESG, national authorities consider that other criteria are sufficient for the choice of a foreign agency. This practice could undermine the commitment that other countries have made to the EQAR, and therefore to the functioning of the EHEA.

14 systems nevertheless are in the situation where their higher education institutions cannot choose to be evaluated by a quality assurance agency of their choice that works in line with the ESG (other than the national one). The three systems shown in yellow permit only some higher education institutions or programmes to be evaluated by an EQAR-registered quality assurance agency from outside the country, while the four systems depicted in orange are in the process of discussing measures to reform this aspect of their quality assurance system.

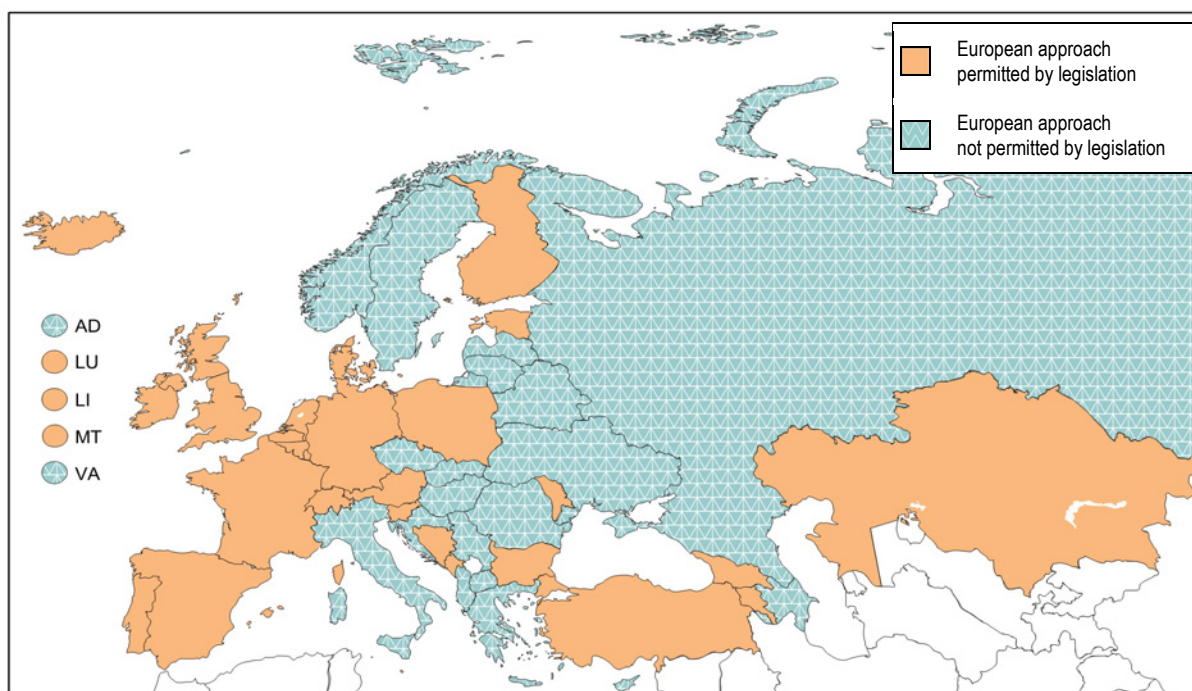### 3.2.5. The European Approach to the Quality Assurance of Joint Programmes in the EHEA

The European Approach to the Quality Assurance of Joint Programmes in the EHEA was adopted by ministers at the Yerevan Conference. This adoption marks a significant step in the construction of the framework enabling an open and inclusive EHEA to operate. In theory, ministers recognised that the European approach will supersede national quality assurance procedures for joint programmes. The European approach is designed to recognise the particular value of cooperation across national borders in joint programmes, and also to rationalise the process of quality assurance for these programmes. Indeed the myriad of similar but different requirements for different parts of programmes in the partner countries is replaced by a single process examining the whole programme. In order for this single European process to be possible, governments have accepted that national requirements for programme level quality assurance or accreditation be waived for joint programmes.

This is an important step particularly for those countries that require programme accreditation. In contrast, for those countries whose system is based on institutional level quality assurance processes, there are no particular requirements for joint programmes to be evaluated – and therefore problems are less likely to arise.

Figure 3.5 focuses on whether the European Approach for quality assurance of joint programmes is permitted by national legislation. Although permitting the use of the European Approach does not imply that practice in respect to quality assurance of joint programmes has changed, it nevertheless gives a clear indication of whether such change is currently possible, and shows whether countries have followed up on the commitment taken in Yerevan.

Figure 3.5: Countries allowing the European Approach for Quality Assurance of Joint Programmes, 2018/19

Source: BFUG data collection.

The commitment to implement the European Approach has not been treated as a high priority in many national systems. There is a slight majority of countries where there is no legal obstacle to using the European Approach for quality assurance of joint programmes. 30 systems now permit the European Approach for quality assurance of joint programmes to be used. These include the countries where quality assurance is primarily undertaken at institutional level, and therefore the European Approach would have a less significant impact.

Since the Yerevan Communiqué, only Georgia, Malta, Moldova, Poland and Slovenia have amended legislation to permit the European Approach. This action is also foreseen in Azerbaijan. The majority of the 20 systems that reported that the European Approach to quality assurance of joint programmes is not permitted by their legislative framework have a quality assurance system that is based on programme-level accreditation. This means that these are countries where the European approach could be particularly beneficial to quality assurance of joint programmes.

3.3. History of progress and challenges in Recognition in the European Higher Education Area

3.3.1. The Lisbon Recognition Convention (LRC)

In some respects, the story of recognition policy in the Bologna Process and the European Higher Education Area makes for a rather straightforward narrative. At the start of the Bologna Process, the Council of Europe/UNESCO Convention on the Recognition of Qualifications concerning Higher Education in the European Region, commonly known as the Lisbon Recognition Convention (LRC) provided a clear legal framework for national recognition policy and institutional practice to develop. After 21 years of the Bologna Process, it still provides the clear legal framework under which recognition policy operates at national and institutional level. This is, however, not quite the whole story.

The Lisbon Recognition Convention (LRC) came into existence in 1997, and hence pre-dates the launch of the Bologna process. Prior to the LRC, recognition was not a widely-used concept. Indeed as mobility between systems was rather unusual, the legal mechanisms in operation had been designed mainly to deal with exceptional situations. Rather than recognition, the notion of equivalence was the dominant concept in the Council of Europe and UNESCO conventions covering academic recognition in Europe. This concept implied assessment of content in one country in order to determine equivalence to similar content in another country. As an example, Article IV of the European Convention on the Equivalence of Periods of University Study Paris, which had been in operation since 1956, specifies that contracting parties, 'shall endeavour to determine...the conditions under which an examination passed or a course taken by a student during a period of study in a university of another member country of the Council of Europe may be considered as equivalent to a similar examination passed or a course taken by a student in his home university'.

The LRC was developed as the reality of higher education student and staff mobility was evolving. The Erasmus programme had been launched a decade prior to the adoption of the LRC, and higher education was opening up to early steps in internationalisation (see Chapter 5, section 1). Despite these early steps in internationalisation and structured student mobility, the 1990s was still a period when each country had developed and operated its own concept of higher education degree programmes, without any great consideration to the higher education world outside national boundaries. In this context, the principles established in the LRC – in particular, establishing recognition as a right unless the competent authorities could demonstrate substantial difference – were very forward thinking. Thus, rather than making small steps to accommodate a changing reality of greater mobility and internationalisation, the LRC instead codified a very radical conceptual innovation.

The LRC also gave legitimacy to what would emerge as today's Diploma Supplement. Indeed, article IX.3 of the LRC states that the Parties shall promote the use of the Unesco/Council of Europe Diploma Supplement or any other comparable document the higher education institutions of the Parties.

With hindsight, the LRC can be seen as a visionary document that conceptually was well in advance of contemporary reality. While its importance was acknowledged in the years following its coming into force, the nature of its conceptual framework was perhaps under-estimated. Thus the 1998 Sorbonne Declaration states:

> 'A convention, recognising higher education qualifications in the academic field within Europe, was agreed on last year in Lisbon. The convention set a number of basic requirements and acknowledged that individual countries could engage in an even more constructive scheme'.

The language of setting 'basic requirements' and suggesting that 'countries could engage in an even more constructive scheme' implies that there was perhaps not a full awareness that a major paradigm shift had taken place in the legal framework governing recognition. This lack of awareness of the implications of the text is part of the reason why it has taken many national higher education systems a number of years to evolve towards the kind of practice that the LRC envisaged.

The LRC sets out principles for recognition as well as implementation mechanisms. Its scope is not only higher education qualifications but also qualifications giving access to higher education. It stipulates that the holders of foreign qualifications have a right to assessment of their qualifications and that no discrimination may take place on the basis of gender, race, colour, disability, language, religion, political opinion, national ethnic or social origin (LRC art. III.1).

Most importantly, the LRC introduces the principle that a foreign qualification should be recognised unless there are substantial differences that can be demonstrated with similar, corresponding

qualifications in the host country. Moreover the onus is on the recognition body in the host country to demonstrate such substantial difference.

The LRC also provides the applicant with the right to appeal (LRC art. III.5). This is of course a reasonable requirement that may seem unworthy of particular comment. Nevertheless, it has significant impact, as it requires countries to ensure that a procedure for appeal must be established, and that the assessing body should provide the applicant with all information on appeal procedures.

As an international treaty, the LRC supersedes national legislation. Therefore when countries ratify the LRC they have an obligation to review and amend their own national legislation to remove any contradictions. Yet since the LRC was established evidence, including the texts of Bologna Ministerial Communiqués, suggests that either national legislation has never been thoroughly amended in line with the LRC, or that amended national legislation is not implemented by the higher education institutions with competence for recognition decisions.

Indeed throughout the Bologna Process there have been various calls to member states to review their legislation and implement the LRC correctly. In the Berlin Communiqué (2003), Ministers set themselves the short term objective 'to improve the recognition system of degrees and periods of studies'. They also 'underline the importance of the Lisbon Recognition Convention, which should be ratified by all countries participating in the Bologna Process, and call on the ENIC and NARIC networks along with the competent National Authorities to further the implementation of the Convention'.

Two year later in Bergan (2005), 36 of the then 45 participating countries had ratified the Lisbon Recognition Convention. Ministers urged those that had not already done so to ratify without delay. They also agreed to draw up national action plans to improve the quality of the process associated with the recognition of foreign qualifications and to include these in national reports at the following Ministerial conference.

By London (2007), the number of signatory countries had risen to 38, and countries had submitted their national reports. However, there was still a concern that 'the range of national and institutional approaches to recognition needs to be more coherent'. Ministers therefore requested the ENIC/NARIC networks to analyse the national action plans and to spread good practice.

This work of analysis was duly done, and in 2009 (Leuven/Louvain-la-Neuve), Ministers asked the BFUG 'to follow-up on the recommendations of analysis of the national action plans on recognition'.

3.3.2. Towards Automatic Recognition

In the second decade of the Bologna Process, the narrative on recognition began to shift. The 2012 Bucharest Communiqué first introduced the notion of 'automatic recognition' which was set as a long term objective of the EHEA. Thus Ministers made a commitment to 'work together towards the automatic recognition of comparable academic degrees, building on the tools of the Bologna framework, as a long-term goal of the EHEA'. Again, the step of reviewing national legislation to comply with the Lisbon Recognition Convention was mentioned, indicating that there was not complete confidence that this had been done by all the countries that had ratified the LRC.

2012 also saw the publication of the European Area of Recognition (EAR) Manual which outlined a set of guidelines for recognition of foreign qualifications and a compendium of good practices. The text also encouraged both higher education institutions and Quality Assurance agencies to assess institutional recognition procedures in internal and external Quality Assurance.

The 2012 Bucharest Communiqué is probably most notable, however, for having called for the establishment of a 'pathfinder group of countries exploring ways to achieve the automatic academic

recognition of comparable degrees'. This was the act which set in motion the ambition in the recognition field to go beyond the implementation of fair recognition as prescribed by the LRC and towards the notion of 'automatic recognition'. Although the notion of automatic recognition has been discussed and its meaning contested ever since this objective was set, the pathfinder group came up with rather clear findings – in particular that automatic recognition was possible for countries to achieve.

Automatic recognition was understood by the Pathfinder Group as 'the automatic right of an applicant holding a qualification of a certain level to be considered for entry to a programme of further study in the next level in any other EHEA-country' (EHEA Pathfinder Group on Automatic Recognition, 2014).

In the 2015 Yerevan Communiqué, automatic recognition was the first pillar of a vision for the EHEA in 2020: 'By 2020 we are determined to achieve an EHEA where our common goals are implemented in all member countries to ensure trust in each other's higher education systems; where automatic recognition of qualifications has become a reality so that students and graduates can move easily throughout it'.

Not for the first time, Ministers also committed in Yerevan 'to review national legislations with a view to fully complying with the Lisbon Recognition Convention'. The fact that this call had been repeated so many times in different Communiqués shows that fair, systematic and effective recognition had become a tougher goal to achieve than anticipated.

Progress towards widespread automatic recognition was also given a boost when, within the European Union, a Council Recommendation of 26 November 2018 was adopted that seeks to promote the automatic mutual recognition of qualifications as well as the recognition of learning outcomes during study periods abroad ([34]). The Recommendation envisages achieving the automatic recognition of qualifications by 2025 throughout the EU, providing further impetus to all the countries in the Bologna Process.

The understanding of automatic recognition is fully in line with agreements in the Bologna Process. Automatic mutual recognition of a qualification is the right for the holder of a qualification of a certain level issued by one country to be considered for entry to a higher education programme at the next level in another, without having to go through any separate recognition procedure. This does not prejudice the right of a higher education institution or the competent authorities to set specific evaluation and admission criteria for a specific programme. Neither does it prejudice the right to check if the qualification is authentic, or if it meets the requirements for accessing a specific higher education programme in the receiving country ([35]).

This definition makes it quite clear that automatic recognition does not imply automatic admission to any specific programme, but rather that the holders of a qualification giving a right of access to a programme of study at the next level should be considered for entry. In addition, one important clarification that follows from the legitimate right to verify the authenticity of a qualification is that automatic recognition does not imply an instantaneous outcome. Rather it means that the same process would apply to holders of national qualifications as well as to those holding qualifications from other countries.

([34]) Council Recommendation of 26 November 2018 on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad, OJ C444/01, 10.12.2018.

([35]) Ibid.

3.3.3. ENIC-NARIC European Recognition Networks

Throughout the Bologna process, an important role has been played by the national information centres on recognition that are grouped in the ENIC-NARIC network. The status and mandate of the national information centres is determined by the respective national competent authority. However, the LRC specifies some requirements of a national information centre, and each centre should therefore abide by provisions set out in the Convention text, as well as the 2004 Joint ENIC/NARIC Charter of Activities and Services, and the 2019 Guidelines for National Online Information Systems.

In accordance with Article IX.2 (2) of the LRC, a National information centre should:

- facilitate access to authoritative and accurate information on the higher education system and qualifications of the country in which it is located;

- facilitate access to information on the higher education systems and qualifications of the other Parties;

- give advice or information on recognition matters and assessment of qualifications, in accordance with national laws and regulations.

Depending on the implementation structure, some Parties may also mandate their National information centre to evaluate qualifications held by individuals, and thus issue recognition advice/recommendation or legally-binding recognition decisions.

It is clear that intensified cooperation among the members of the ENIC/NARIC network will play a key role to further advances in improving recognition processes.

3.4. Qualitative indicators on Recognition in the European Higher Education Area

3.4.1. Principles of the Lisbon Recognition Convention in national legislation, 2018/19
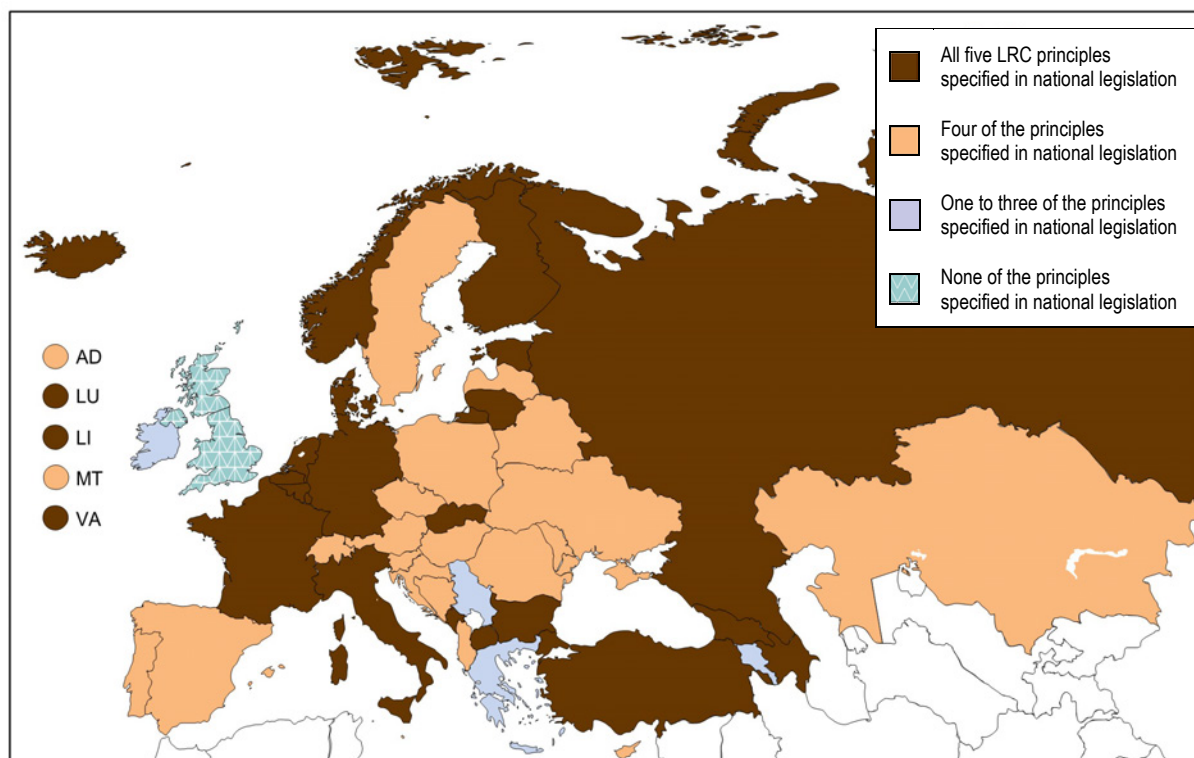
Figure 3.6 shows the extent to which the main principles of the LRC are specified in national legislation. The principles highlighted in the indicator are that:

1) applicants have right to fair assessment; 2) there is recognition if no substantial differences can be proven; 3) legislation or guidelines encourage comparing of learning outcomes rather than programme contents; 4) in cases of negative decisions the competent recognition authority demonstrates the existence of substantial difference; 5) applicant's right to appeal of the recognition decision. Implementation of these principles was identified by the Pathfinder Group as an important step towards automatic recognition.

As the ratification of the Lisbon Recognition Convention has long been completed by all EHEA countries except Greece, it may be expected that all countries would have embedded all principles into national legislation. This is not the case.

Source: BFUG data collection.

The number of systems where all of these main principles are specified in national legislation has now risen to 23. Improvement appears to have been made in most cases with regard to the requirement of the competent recognition authority to demonstrate the existence of substantial difference in the case of negative decisions. The number of systems where four of the principles are embedded in legislation is now 21. A further four systems specify one to three principles. The United Kingdom and the United Kingdom (Scotland) do not legislate in this area as institutions within the UK have full autonomy over their admissions, and this is considered as invalidating the requirement for principles to be specified in national legislation. Nevertheless, the UK's governments and its higher education institutions are strongly committed to open, fair and transparent admissions processes.

3.4.2. Implementation of Article VII of the Lisbon Recognition Convention

In recent years, large numbers of individuals of all ages have been fleeing conflict zones, and relocating in other countries. Forced to interrupt studies or professional activity, many bring with them competences and skills acquired in their country of origin that can be further developed in the host country through further studies, sometimes in higher education. In the future, as well as conflicts and natural disasters, it is certain that there will be enormous numbers of people obliged to leave their home countries as a result of climate-related events.

However, institutions responsible for the recognition of foreign qualifications may face particular challenges in the evaluation and recognition process. These are often associated with the lack of established recognition procedures and policy for undocumented qualifications, as well as a lack of information on legal obligations. In such cases, article VII of the LRC serves as a framework for developing good practice. It states simply:

> 'Each Party shall take all feasible and reasonable steps within the framework of its education system and in conformity with its constitutional, legal, and regulatory provisions to develop procedures designed to assess fairly and expeditiously whether refugees, displaced persons

and persons in a refugee-like situation fulfil the relevant requirements for access to higher education, to further higher education programmes or to employment activities, even in cases in which the qualifications obtained in one of the Parties cannot be proven through documentary evidence'.

Not only did the Yerevan Communiqué call for action on refugee qualifications, but in 2016 at the meeting of the Committee of the Convention of the Recognition of Qualifications in the European Region, national government representatives adopted a statement on the recognition of qualifications held by refugees, displaced persons and persons in a refugee like situation (36) inviting parties to the convention to implement fully Article VII. Figure 4.18 shows where this has, and has not, been followed up.

Figure 3.7: Implementation of Article VII of the LRC at national level, 2018/19
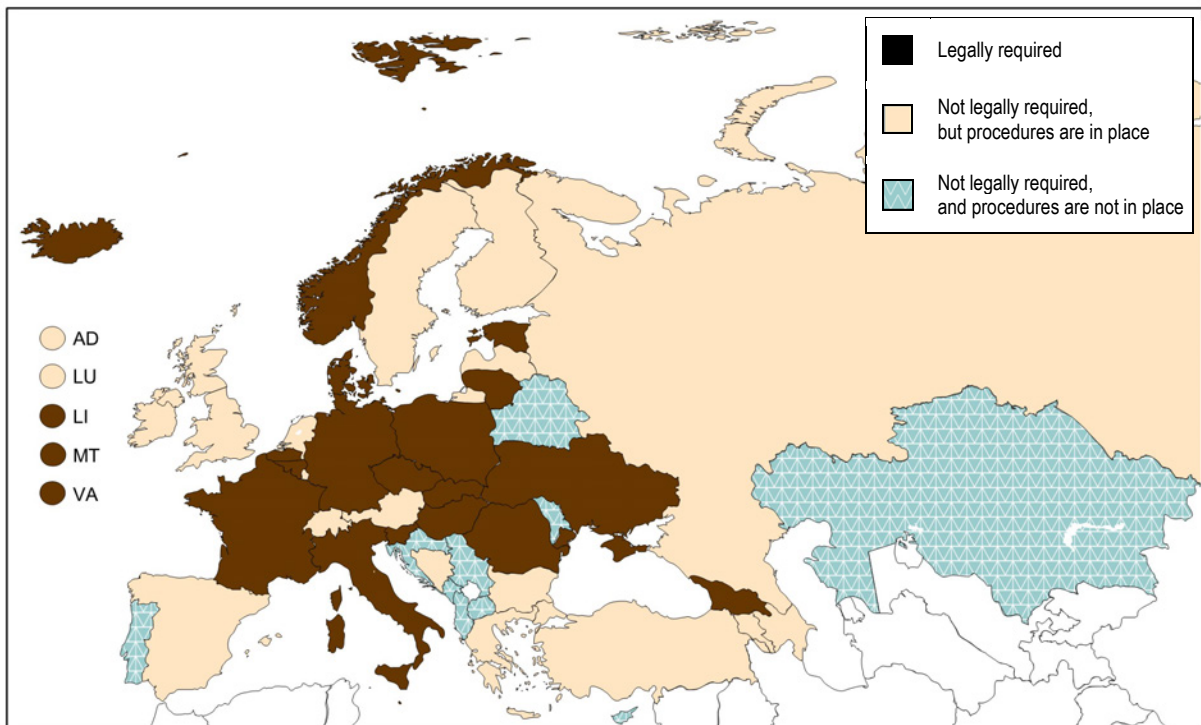
Source: BFUG data collection.

The overall picture is that the implementation of Article VII has been patchy at best. Despite the widespread ratification of the LRC, it appears that countries have not necessarily followed up in national implementation with regard to Article VII.

In 21 systems there is a clear legal requirement for procedures to be followed. These systems include two – Italy and Malta – that are an important entry point for refugees to Europe. Both countries have clear legislation and procedures for refugees and displaced persons with qualifications to follow.

19 other systems have not outlined any legal procedures for the recognition of refugee qualifications. However, these countries claim that procedures are in place even if there is no legal requirement for them.

10 systems have no requirement for specific recognition procedures to be in place for refugees, displaced persons and persons in a refugee-like situation.

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(36)   http://www.enic-naric.net/fileusers/LRCC_Statement_on_the_recognition_of_qualifications_held_by_refugees.pdf

3.4.3. Automatic Recognition

As outlined in section 3.3, after the launch of the European Higher Education Area in 2010, the EHEA ministers of higher education recognised that procedures for the academic recognition of qualifications continued to be often lengthy and burdensome. This is the reason why, in 2012 in Bucharest, the Ministers of higher education across the EHEA committed themselves to the long-term objective of 'automatic recognition' of comparable academic degrees.

While there has been much discussion and confusion about the notion of automatic recognition, a clear understanding has been outlined for the EHEA: 'Automatic recognition of a degree leads to the automatic right of an applicant holding a qualification of a certain level to be considered for entry to a programme of further study in the next level in any other EHEA-country (access)' (EHEA Pathfinder Group on Automatic Recognition, 2014).

This definition makes it clear that automatic recognition does not imply automatic admission to any specific programme, but rather that holders of a qualification giving access to a programme of study at the next level have the right to be considered for entry. The Pathfinder Group reached the conclusion that automatic recognition is a necessary pre-condition for large-scale academic mobility, and proposed a number of recommendations to improve the situation. Meanwhile, in the Yerevan Communiqué ([37]) in May 2015, ministers made the commitment 'to ensure that qualifications from other EHEA countries are automatically recognised at the same level as relevant domestic qualifications'.

Although this commitment to automatic recognition is clearly stated, there remain some grey areas about its meaning. The Pathfinder Group recommended that a qualification based on the EHEA three-cycle structure from one EHEA country should be recognised at the same level anywhere else in the EHEA. So the first aspect is that it concerns automatic recognition of the qualification level. The principle under examination is whether students who hold qualifications from other EHEA countries have the level of their qualification recognised in the same way as holders of qualifications issued within the country. As the Pathfinder Group specified, the objective is that a bachelor is a bachelor across the EHEA.

Scoreboard indicator 8 monitors progress towards the automatic recognition of qualifications. Firstly, a distinction is made between the higher education systems based on whether they have implemented system-level automatic recognition of qualifications, and if they have, whether such automatic recognition covers all EHEA countries. Secondly, in the absence of automatic recognition with all EHEA countries, the indicator takes into account the conditions under which recognition procedures operate and the number of steps taken on the path towards automatic recognition.

In the first three categories, there is some automatic recognition of qualifications but there are differences either between the EHEA countries covered or the number of implemented policy measures steering the countries towards automatic recognition. The last two categories (orange and red) have no automatic recognition of qualifications but again they each differ in the number of steps taken towards this goal.
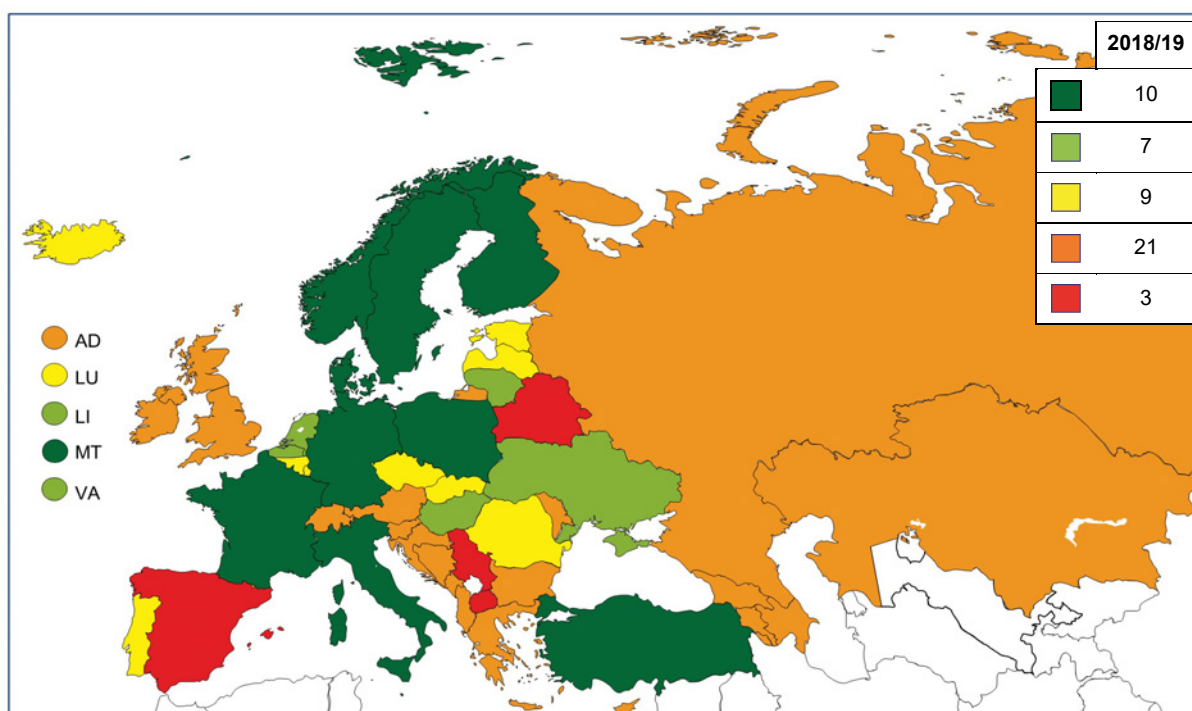
Thus for the dark green category, all higher education qualifications issued in other EHEA countries are recognised on an equal level with qualifications in the home country without any additional procedures in higher education institutions. This could be achieved in several different ways. For example, there could be a legally binding document outlining degree qualifications from other EHEA countries which are recognised. Alternatively, there could be multilateral agreements in place which cover all countries in the EHEA. Automatic recognition may also be achieved in reality through non

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([37]) Communiqué of the Conference of European Ministers responsible for Higher Education, Yerevan, 14-15 May 2015, p. 3

legally binding bilateral and multilateral agreements to recognise qualifications, or through following procedures that are coherent with de facto automatic recognition – for example checking only that a qualification is legitimate, and not examining the details of course or programme contents.

Figure 3.8: Scorecard indicator n°8:
System level (automatic) Recognition for academic purposes, 2018/19

Source: BFUG data collection.

S c o r e c a r d   c a t e g o r i e s

🟩	Automatic recognition is in place, meaning that all higher education qualifications issued in other EHEA countries are recognised at system level on an equal level with comparable (38) academic qualifications in the home country and give the right to be considered for entry to a programme of further study at the next level.
🟨	Automatic recognition is in place for a subset of EHEA countries, meaning that all higher education qualifications issued in these countries are recognised at system level on an equal level with comparable academic qualifications in the home country and give the right to be considered for entry to a programme of further study at the next level. All of the following conditions apply to recognition practice: • National legislation has been reviewed and, if necessary, modified to ensure that the principles of the Lisbon Recognition Convention (LRC) are respected. • Higher education institutions or recognition bodies receive clear guidance on properly implementing the principles of the LRC. • Recognition decisions are taken within a four month limit. • Appeals procedures are in place, and decided within a clear and reasonable time limit. • Recognition practice in HEIs is monitored by external quality assurance in line with the European Standards and Guidelines 2015.
🟨	Automatic recognition at system level takes place with a subset of European countries. For qualifications from other countries, some but not all of the conditions apply to recognition practice.
🟧	There is no automatic recognition. At least two of the conditions apply to recognition practice.
🟥	There is no automatic recognition. Less than two of the conditions apply to recognition practice.

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(38)   The term 'comparable' implies that foreign qualifications are treated in the same way as national degrees (e.g. a first-cycle degree from an EHEA country vs. a national first-cycle degree) for the purpose of further study at the next level without additional recognition procedures.

87

The same approach to automatic recognition is used to determine countries in the light green category, with the difference that here the notion of automatic recognition applies only to a subset of EHEA countries. Where there is not a process of automatically recognising all EHEA degrees, the indicator looks at five measures specified by the Pathfinder Group as steps towards automatic recognition. These measures are:

- national legislation will have been reviewed and, if necessary, modified to ensure that the principles of the Lisbon Recognition Convention (LRC) are respected;

- higher education institutions (HEIs) or other recognition bodies receive clear guidance on properly implementing the principles of the LRC;

- recognition decisions are taken within a four month limit;

- appeals procedures are in place, and decided within a clear and reasonable time limit and;

- recognition practice in higher education institutions is monitored by external Quality Assurance (QA).

The number of these measures that have been implemented enables countries to be differentiated on the path towards automatic recognition. Thus the distinction between education systems in the categories 'light green' or 'yellow' is based on how extensively they have implemented the five measures outlined by the Pathfinder Group. Countries in both the light green and yellow categories have automatic recognition established with one or more countries – either through bilateral agreements or through regional agreements. Those education systems in the 'light green' category have implemented all of the conditions, while countries in the 'yellow' category have so far implemented only some of them.

Countries where there are additional recognition procedures for all EHEA countries inevitably find themselves in either the orange or the red categories. If they have implemented fewer than two of the steps towards automatic recognition they are in the lowest category.

The indicator depicted in Figure 3.8 reveals that the European Higher Education Area is still far from achieving widespread automatic recognition, though progress has been made. The distribution of education systems along the main categories is as follows:

There are 10 systems (Denmark, Germany, France, Italy, Malta, Poland, Finland, Sweden, Norway and Turkey) that practice automatic recognition for all EHEA countries, and that now are shown in dark green. The number of systems in this category has increased from five in the 2018 edition of the Bologna Process Implementation Report for the reference year 2016/17.

In a further 16 systems, automatic recognition applies to some EHEA countries. Here, the number of education systems in this category increased due to the Baltic intergovernmental agreement which entered into force this academic year.

24 systems are still in the orange and red zones indicating that recognition is not (fully) automatic in their system. More positively, of the countries not operating automatic recognition, the vast majority (21) have implemented at least two of the key measures of good practice in recognition. This also means that fewer education systems (3) are in the red category compared to 2016/17.

3.5. Conclusions

3.5.1. Quality Assurance

The rise of quality assurance in higher education is one of the most remarkable developments within the sector in the last two decades. The first wave of Communiqués (1999-2007) defined the main quality assurance agenda in the EHEA. A second wave came to consolidate the initial pledges (2007-2012). A third wave has been notable for the development of the overall quality assurance framework and a closer integration of quality assurance with other related issues – including automatic recognition, a closer link to the EHEA qualifications frameworks, and the adoption of the European Approach for Quality assurance of Joint Programmes.

Quality assurance systems have become a key driver of change in European higher education institutions. After two decades of Bologna reform, almost all countries now have internal and external quality assurance systems in place on a system-wide scale. The multi-level, multi-actor governance process of the Bologna Process is also reflected in quality assurance systems, and the trend continues towards embedding internationalisation within the structures of national external quality assurance systems.

With the adoption of ESG 2015, the 'EHEA model' for quality assurance became more consolidated, clear and visible. The European Quality Assurance Register (EQAR) exists as a clear mechanism to guarantee compliance with the ESG, and it has now become an established feature of the EHEA. One of the main benefits of quality assurance systems developing along the lines outlined by common standards and guidelines has been the strengthening of trust.

Surveying the extent of developments of quality assurance system, it would be difficult to argue that EHEA systems do not provide a sound, reliable and systematic basis for trust and recognition. Yet, despite this, not all EHEA countries are ready to put trust on a systematic basis and enable all higher education institutions to be evaluated by a quality assurance agency from another country that has been proven to work in line with the ESG.

While the conditions for trust have been realised, the practice of trust is still to be improved. While the EHEA has grown closer together over last 20 years, there are risks of concentrating trust only in a few regions and/or with those countries that have more similar systems. The challenge to ensure that trust extends to the whole EHEA remains as we enter a new decade.

3.5.2. Recognition

EHEA cooperation has focused for many years on improving and simplifying recognition practices. European higher education policy has worked towards easier and fairer recognition on the basis of the Lisbon Recognition Convention – protecting the value of learning outcomes and ensuring that qualifications are easily understood and communicated. However, despite the overarching legal framework established by the Lisbon Recognition Convention (LRC), as well as the structures and ongoing policy and expert dialogues, there are still obstacles to overcome. Further action is therefore required.

With regard to implementation of the LRC, there is no doubt that many countries have not taken action to ensure that all aspects of the convention are properly implemented in national legislation. The fact that in a majority of EHEA countries article VII is not legally required is ample evidence that the convention has not been fully and systematically implemented.

Countries have been keen to stress that they are making improvements towards the long-term priority objective of achieving system level or 'automatic recognition'. Slightly less than half of the EHEA systems currently recognise qualifications of some other EHEA countries automatically, and ten do so for all EHEA countries. While it is encouraging to note that several countries report recent policy developments extending automatic recognition, in the majority of systems improvements are still needed to allow qualitied learners automatic access to higher education in other countries.

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