Implementing the European Approach for Quality Assurance of Joint Programmes

Background report

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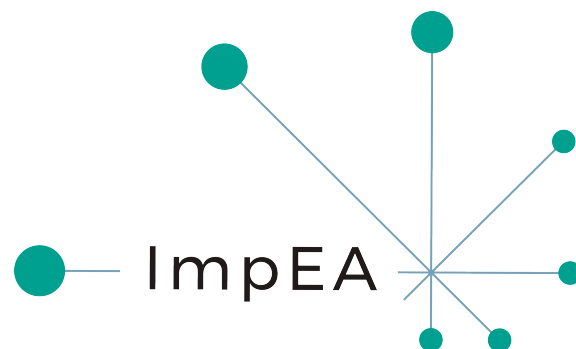Maciej Markowski – PKA

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ImpEA

Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes

Erasmus+

Project leader

Project partners

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e c a
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The European Approach – what is it?

Joint programmes[1] are a hallmark of the European Higher Education Area (EHEA). They are set up to enhance the mobility of students and staff, to facilitate mutual learning and cooperation opportunities and to create programmes of excellence[2]. While there has been a political will in many countries, and interest from institutions to create joint programmes, it is well known that they are complicated and laboursome to manage. Not least because of the complexity in satisfying the different (and potentially incompatible) quality assurance requirements in the different countries of the participating institutions. Additionally, the different national QA procedures applying to a single joint programme have tended to look only at the part of the programme delivered in a given country, failing thus to fully embrace and evaluate the entirety of the programmes, i.e. bringing forth the value of its "jointness".

The European Approach for Quality Assurance of Joint Programmes, approved by the Bologna Follow-Up Group in October 2014 and adopted by the EHEA Ministers in their conference in Yerevan, in May 2015, was set up to address these issues and to provide a common framework for the external quality assurance of such programmes.

The European Approach provides a set of standards based on the agreed tools of the EHEA (the Standards and Guidelines for Quality Assurance in the EHEA (the ESG), the QF-EHEA, and the ECTS) and proposes an ESG compliant review methodology. It facilitates an integrated approach that can genuinely reflect the joint character of the programmes, taking them as a whole, and addressing quality issues typical and often specific for joint programmes (e.g. consortium agreements, student support for mobility etc.).

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[1] "Joint programmes" are understood as an integrated curriculum coordinated and offered jointly by different higher education institutions from EHEA countries, and leading to double/multiple degrees or a joint degree.

[2] The European Approach for Quality Assurance of Joint Programmes, October 2014 - https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf

Consequently, the European Approach is intended to allow a programme consortium to engage in one single quality assurance or accreditation procedure, based on one set of standards, without consideration of additional national standards. When properly implemented and recognised across the EHEA, the use of the European Approach is expected to significantly reduce the administrative burden for external quality assurance of joint programmes making them thus a more interesting and manageable form of international cooperation for European higher education institutions.

More specifically, the European Approach is composed of a set of standards and related guidelines covering the following areas: eligibility; learning outcomes; study programme; admission and recognition; learning, teaching and assessment; student support; resources; transparency and documentation; and quality assurance. The standards are based on and cover all standards of part 1 of the ESG.

The European Approach document also outlines a procedure for the external evaluation of joint programmes. The model follows a typical external quality assurance process, as also described in the ESG, composed of a self-assessment; a peer-review (with a site visit); a report and its publication; and adequate follow-up. It also covers possible decision-making procedures and a system of appeals. This means that the European Approach is in line with the requirements for external quality assurance as described in the ESG Part 2. The programme consortium should be able to choose any available agency (from one of the participating countries or from a third country) registered in the European Quality Assurance Register (EQAR) to carry out the procedure.

At the moment, European countries have different approaches to external quality assurance. As explained in the European Approach description itself, this has consequences on how it can be used depending on the composition of the consortia.

1) If one or more of the cooperating higher education institutions **require external quality assurance at programme level** (e.g. programme accreditation or evaluation is mandatory), then the cooperating institutions should select a suitable quality assurance agency from the list of EQAR-registered agencies to carry out the external QA process for their joint programme according to the European Approach. The agency will use the standards and the procedure contained in the European Approach and the result is to be accepted in all EHEA countries.

2) If **all cooperating higher education institutions** are subject to **external quality assurance at institutional level** only and have "self-accrediting" status, they may use the European Approach for their joint internal approval and monitoring processes for their joint programmes, if they deem it useful. No additional external evaluation or accreditation procedures at the programme level are necessary.

Current national policies and legal frameworks related to the European Approach

The European Approach was adopted by the EHEA Ministerial Conference in Yerevan, in 2015 as a formal EHEA document, with a commitment to enable its use across Europe. However, today, three years after its adoption, data shows that most countries have not yet adapted their systems to enable the full use of the European Approach for the external quality assurance of joint programmes instead of national processes, and without additional criteria or requirements.

According to data from EQAR, to date, thirty countries[3] out of the 48 EHEA countries do not offer higher education institutions the possibility to use the European Approach. Additionally, in Bosnia and Herzegovina the programmes may opt for the European Approach, but they will not be included into the State register of accredited programmes, which results in a de facto "no" response, as the European Approach would need to be complemented by additional national accreditation processes. In Norway, only institutions that are not subject to programme accreditation may use the European Approach, i.e. its use is allowed only when there is no corresponding national EQA requirement.

According to EQAR, in Armenia, Belgium, Bulgaria, Denmark, Kazakhstan, Liechtenstein, Moldova, and the Netherlands higher education institutions can opt for the European Approach, at least in some cases. In Germany, it is allowed for programmes that lead to a joint degree (but not if the joint programme leads to a double or

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[3] Albania, Andorra, Azerbaijan, Belarus, Croatia, Cyprus, Czech Republic, Estonia, France, Georgia, Greece, Holy See, Hungary, Iceland, Italy, Kosovo, Latvia, Lithuania, Montenegro, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Sweden, Macedonia, Turkey and Ukraine. It is important to note that this information may be changing rapidly as countries adapt their regulatory frameworks to enable the use of the European Approach.

multiple degree). In most of these cases the condition is that the agency carrying out the evaluation are EQAR registered.

In many additional countries, where the use of the European Approach is possible, it is because there is no requirement for external quality assurance or accreditation at the programme level. In others, the right to use the European Approach is limited to the self-accrediting institutions. This is the case e.g. in Austria, where public HEIs are self-accrediting and may use the European Approach, whereas universities of applied sciences and private HEIs are not self-accrediting and consequently cannot use the European Approach instead of their obligatory national external quality assurance. Similarly, in Ireland where only institutions with degree awarding powers or with delegation of such powers by the national quality assurance agency QQI (Quality and Qualifications Ireland) can make use of the European Approach, and in Luxembourg where only the University of Luxembourg has self-accrediting powers, while other HEIs in the system cannot use the European Approach. In Finland, Switzerland, and the UK the institutions are free to use the European Approach for their joint programmes as there are no national requirements for programme accreditation. This means that most countries that "allow" for the use of the European Approach have not changed anything in their frameworks to make it possible as these are systems with institutional rather than programme level external quality assurance.

The EQAR data is largely in line with the findings of the Bologna Process implementation report 2018 (draft) according to which a slight majority of countries do not have any legal obstacles for the use of the European Approach (28 systems out of 50)[4]. As explained above, however, most of those systems do not require programme accreditation at all. Therefore, while the figures may look relatively positive, there has been little change in the systems since 2015 when the European Approach was adopted. Indeed, only two countries – Georgia and Slovenia - have changed legislation to allow for the use

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[4] The Europan Higher Education Area in 2018 – Bologna Process Implementation Report, pp. 139-140 - https://publications.europa.eu/en/publication-detail/-/publication/2fe152b6-5efe-11e8-ab9c-01aa75ed71a1/language-en/format-PDF/source-71779208

of the European Approach. As all of the 22 systems which have reported that the use of the European Approach is not allowed as a replacement for obligatory national external QA have a programmatic approach, it is precisely in countries where the use of the European Approach would have the greatest positive impact in terms of facilitating external QA procedures, that it is still not allowed. A report produced as an outcome of the Higher Education Reform project in Spain (the HERE-ES project)[5] in 2016 outlined that the different regulatory frameworks were the main obstacle to the implementation and use of the European Approach and predicted that such restrictions will not "go away" in the short term. The findings of the Implementation Report 2018 seem to confirm that.

It is clear that the picture is in constant flux as countries change their frameworks to allow for the European Approach. Closer scrutiny of the data, in particular when comparing the data from EQAR and those provided by countries to the implementation report, confirms that most often the picture is not black or white, yes or no, but composed of various shades of gray and "it depends". Indeed, in many cases the use of the European Approach is possible, but on conditions. This could mean that it can be used by a sub-set of institutions or programmes, or that there is no mechanism for automatically recognising its outcome. In Estonia and France, for example, the approach can be used subject to general conditions for recognising QA results of EQAR registered agencies. In Spain, while the discussions on the use of the European Approach are ongoing, there are not yet concrete changes in regulations allowing it to be used in practice. In Poland, for example, the European Approach cannot directly replace the procedure of the Polish Accreditation Commission (PKA). Within the framework of some mutual recognition agreements such as MULTRA, there are ways to make use of other agencies' decisions (including those based on the European Approach), but for the moment recognition is not automatic, and each case is considered individually by the PKA decision-making body. In Slovenia, according to the provisions in the higher education law, the European Approach

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[5] https://sede.educacion.gob.es/publiventa/higher-education-reforms-in-spain-here-es-project-quality-assurance-of-joint-programmes/educacion-universidad/21350

could be used only for programmes where all partner higher education institutions involved are (institutionally) accredited by EQAR-registered agencies.
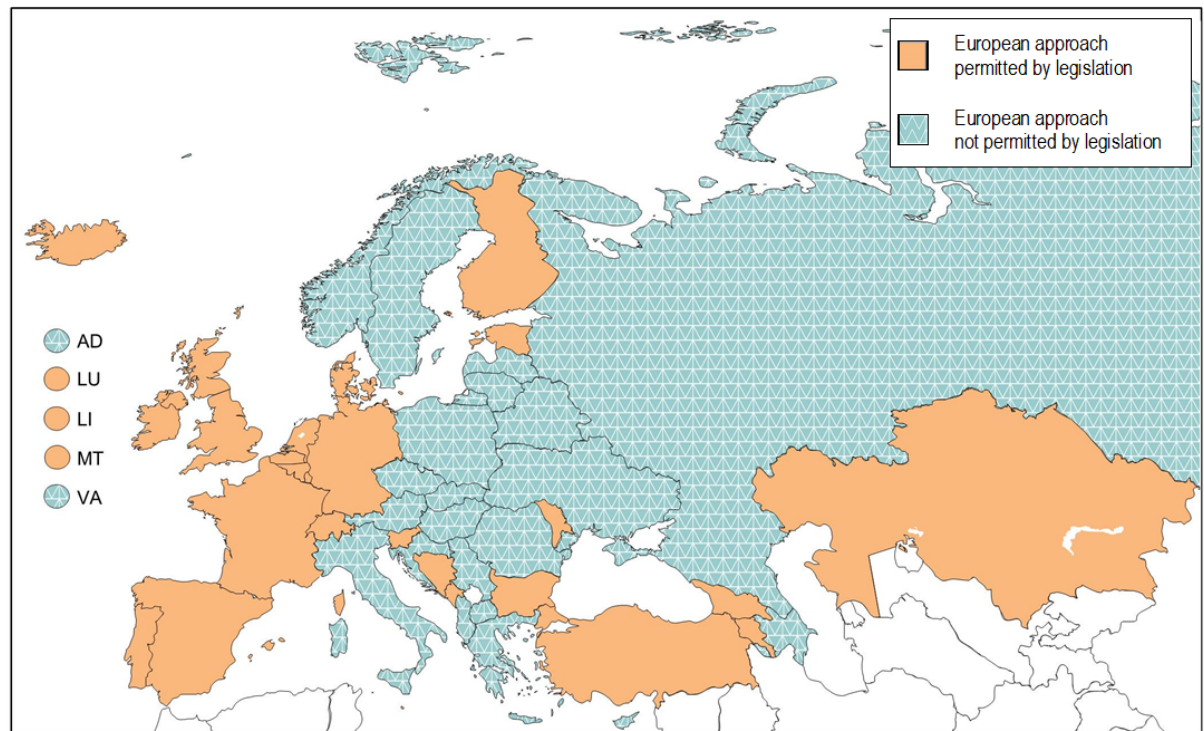
Source: BFUG data collection.

Figure 1 Countries allowing the European Approach for Quality Assurance of Joint Programmes, 2016/17

The current use of the European Approach by agencies and institutions – data from the ImpEA survey

In order to obtain a better view of the situation in relation to the use of the European Approach, including real and perceived main challenges and difficulties in its use, the ImpEA project launched a survey in early 2018, addressing principally higher education institutions (and joint programmes), as well as quality assurance agencies. The survey addressed the following broad categories of questions:

1) How well is the European Approach known to HEIs and QAAs and where can they find information about it?

2) How widely is it used, for either IQA or EQA purposes?

3) What are the main obstacles in using the European Approach?

4) What support is most needed in order to make the European Approach a feasible option for the external quality assurance of joint programmes?

The survey gathered **46 responses from quality assurance agencies and 198 responses from higher education institutions.** Of these latter, around half had coordinated a joint programme and an additional 25% had been a partner in a joint programme. Some respondent institutions had never been involved and were not even considering getting involved in a joint programme (13 responses). Most responses were by institutions in countries with a programmatic approach to external quality assurance.

Most of the participants from the higher education institutions are currently either a coordinator or a partner in at least one joint programme consortium. It is also worth noticing, that almost 20% of

the respondents are not currently providing any joint programmes, but they do consider developing or joining them in the future.

Do you currently have joint programmes in your education offer? Responses
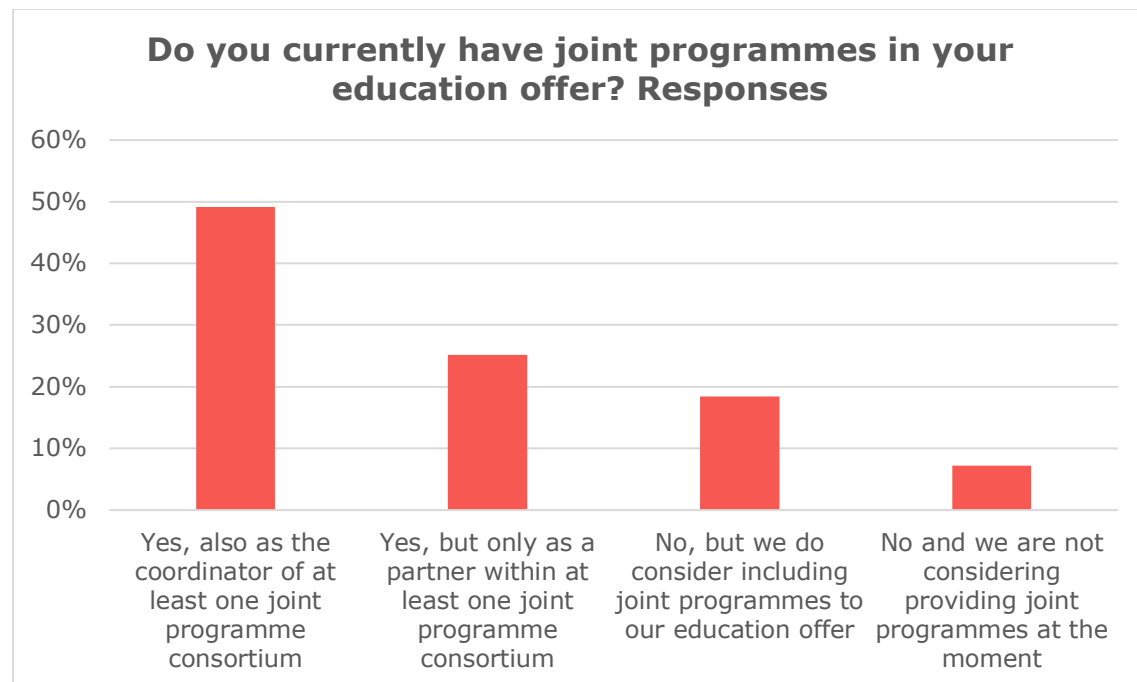
Figure 2 Profile of the survey respondents – higher education institutions

Out of the quality assurance agencies, 80% declared that their system had obligatory programme accreditation but at the same time, 55% had never used the European Approach. Nine agencies declared having completed a procedure with the European Approach, two had ongoing procedures and four had recently initiated a procedure. While these data are already indicating a very low number of completed European Approach procedures across Europe, they may be giving even as such an overly positive picture. Indeed, from the collection of actual case examples, it seems that only a few procedures (by four agencies) have been completed using the European Approach.

FAMILIARITY WITH THE EUROPEAN APPROACH

It is clear from the survey results that the European Approach is not well known within the higher education sector. In addition, even institutions and agencies who have heard about it or know something

about it, indicate a clear need for more information on its use. Of the nearly 200 institutions, around 30 (16%) said they did not know the approach at all, while, on the other hand, less than 10% said they knew it very well.
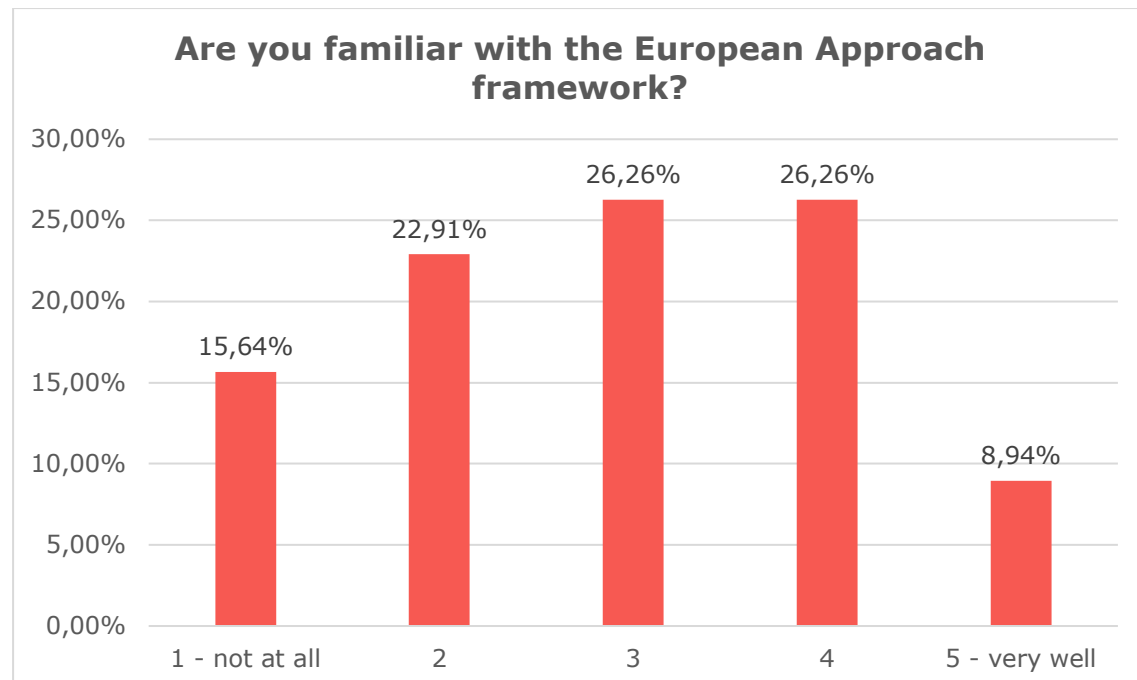

Figure 3 Familiarity with the European Approach - higher education institutions

While the weighted average on the scale of 0 to 5 was 2.9, it is clear that even where known to some extent, the detailed understanding on when and how the Approach can be used and what is its status in the given countries is still very low.

Indeed, more than half of the respondents did not know if the European Approach was allowed in their countries (instead of the usual national external quality assurance processes). Three quarters of responding higher education institutions did not know how they could apply for the European Approach for their joint programmes, while at the same 80% expressed that they would like to be able to apply.
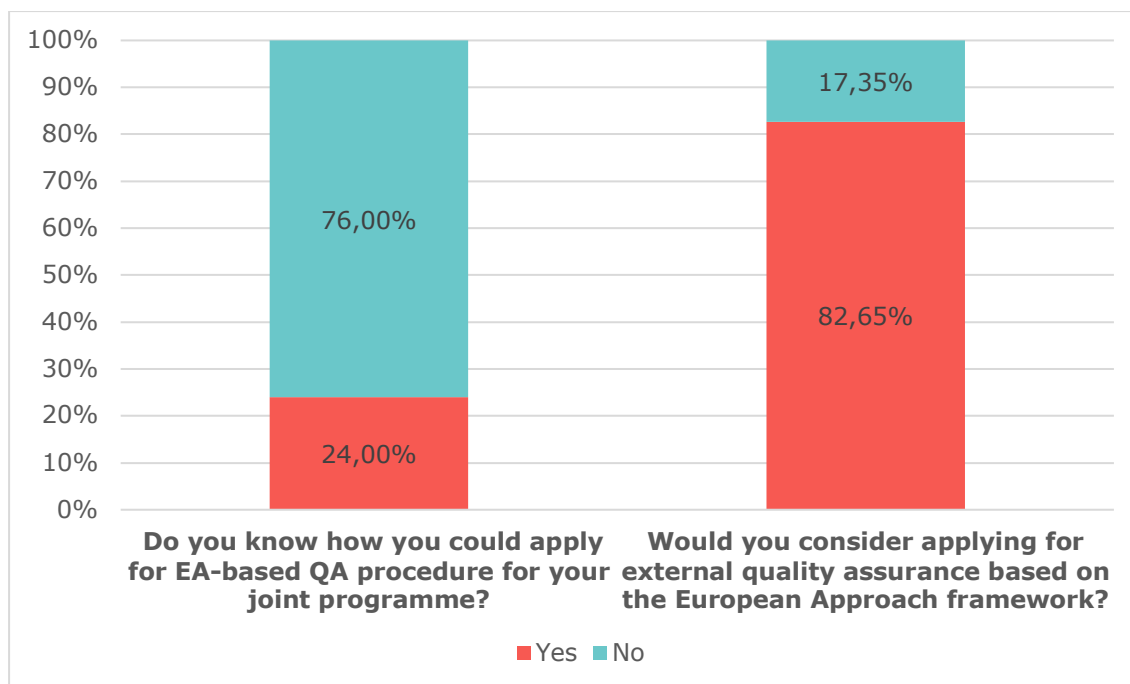
Figure 4 Perception of applying for EA-based external quality assurance procedure - higher education institutions

Those institutions who did not wish to use the European Approach mainly thought that it would not be accepted by their country or their quality assurance agency, or they were not subjected to programme reviews. In both cases the perception is thus that the use of the European Approach would simply create additional work for the programmes and institutions.

INFORMATION SOURCES

When asked about information on the European Approach, more then 50% respondents indicated The European Commission or local Erasmus+ agency. Other sources i.e. EQAR or national / regional quality assurance agency were much less frequently indicated. Only in seven instances the information was received from the national ministry or other relevant higher education authorities.
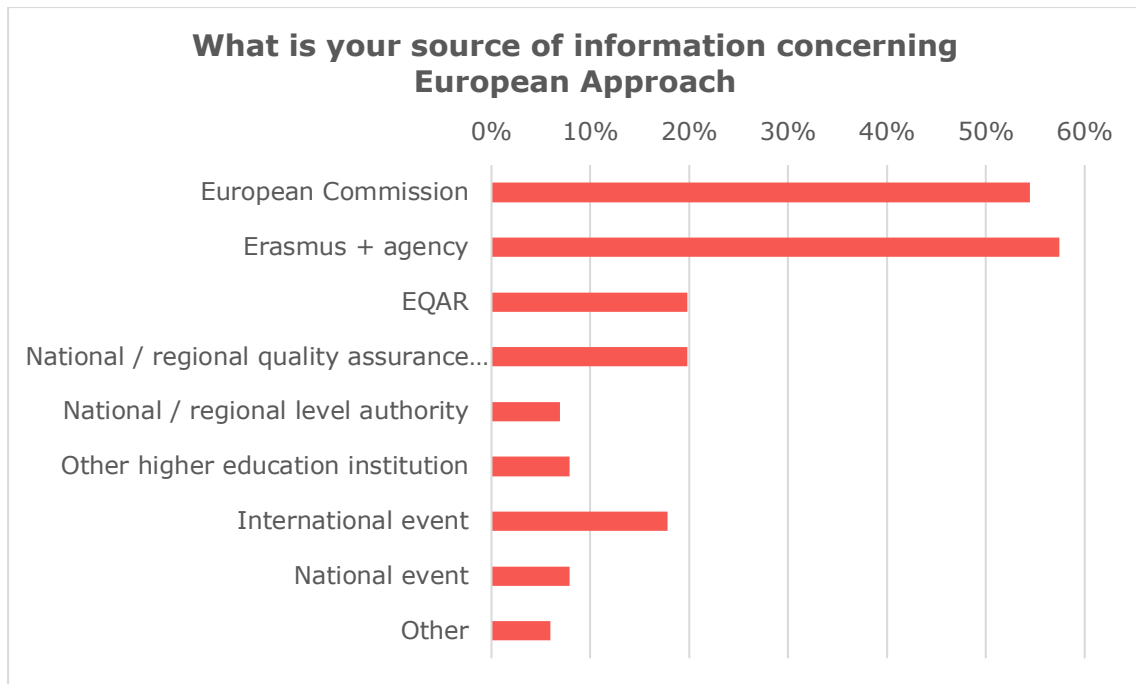
What is your source of information concerning European Approach

Figure 5 Sources of information concerning European Approach - higher education institutions

These data are surprising, in particular as the Erasmus+ support for joint programmes has not thus far listed the European Approach as an option for programmes needing to demonstrate their accreditation status as part of the application process. As natural as it is that for other information their first port of call would be indeed the Erasmus+ agency, rather than their local/national QA agency, it is thus puzzling to see that over half of the institutional respondents indicated the EU Commission or national Erasmus+ agency as their main source of information on the European Approach itself. It is hard to say whether the low information relevance of the QA agencies and EQAR is an indication of the (lack of) availability of information through these channels, or whether, more likely in particular in the case of EQAR, people would not know that these sources could be used.

ISSUES REQUIRING CLARIFICATION

The survey participants were asked which procedural issues needed most clarification from their point of view. The least clear elements were the specificity of the European Approach and – even more so -

the legal validity of the European Approach (in their own system). As one of the key objectives of the European Approach is to replace multiple national procedures that a programme might be subject to, lack of clarity or reassurance of its validity as a replacement of those procedures will have a negative impact on the institutions' interest and willingness to use it.
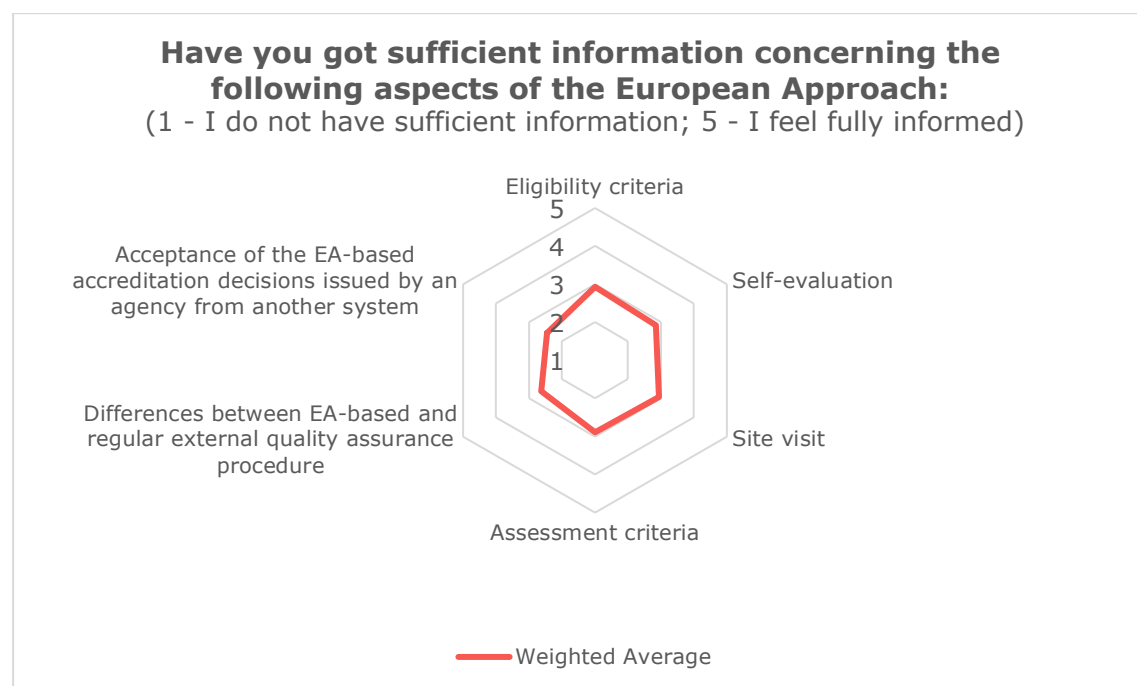

Figure 6 Satisfactory information concerning the European Approach – higher education institutions

In terms of the standards of evaluation for joint programmes in the European Approach, the clearest to the respondents were the standards on learning outcomes and the study programmes, which both scored a weighted average of under 2.5. Transparency and documentation, as well as the set requirements for quality assurance, were considered as the least clear, at around 3 points. This could indicate that the programmes do not struggle so much with the standards related to the actual design and implementation of the programme, but rather with the more procedural elements specific to the external quality assurance requirements.

Quality assurance and accreditation agencies' responses show that the European Approach framework is in general clearer for them,

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comparing to the higher education institutions. At the same time, agencies declare similar need for further clarifications of criteria regarding eligibility issues and admission and recognition.
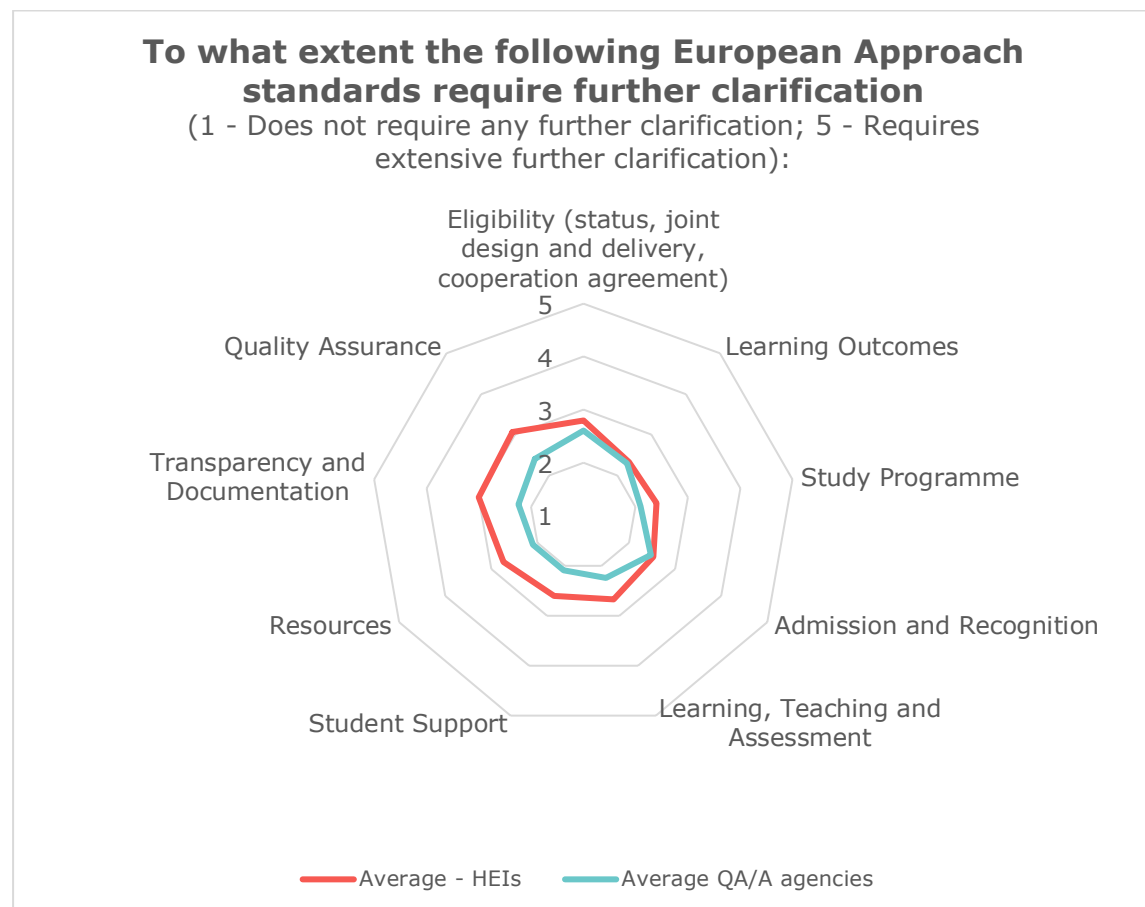
To what extent the following European Approach standards require further clarification

(1 - Does not require any further clarification; 5 - Requires extensive further clarification):

Figure 7 Standards requiring further clarification - higher education institutions and quality assurance agencies

Institutions were also asked what factors were or would be important when selecting an external quality assurance agency for an eventual future evaluation of a joint programme using the European Approach. The following graph shows clearly that the reputation of an agency is rated the highest at over four out of a maximum of five. Experience in carrying out QA procedures with the European Approach was also considered very important, without forgetting the costs of the procedure as an important factor in the equation.
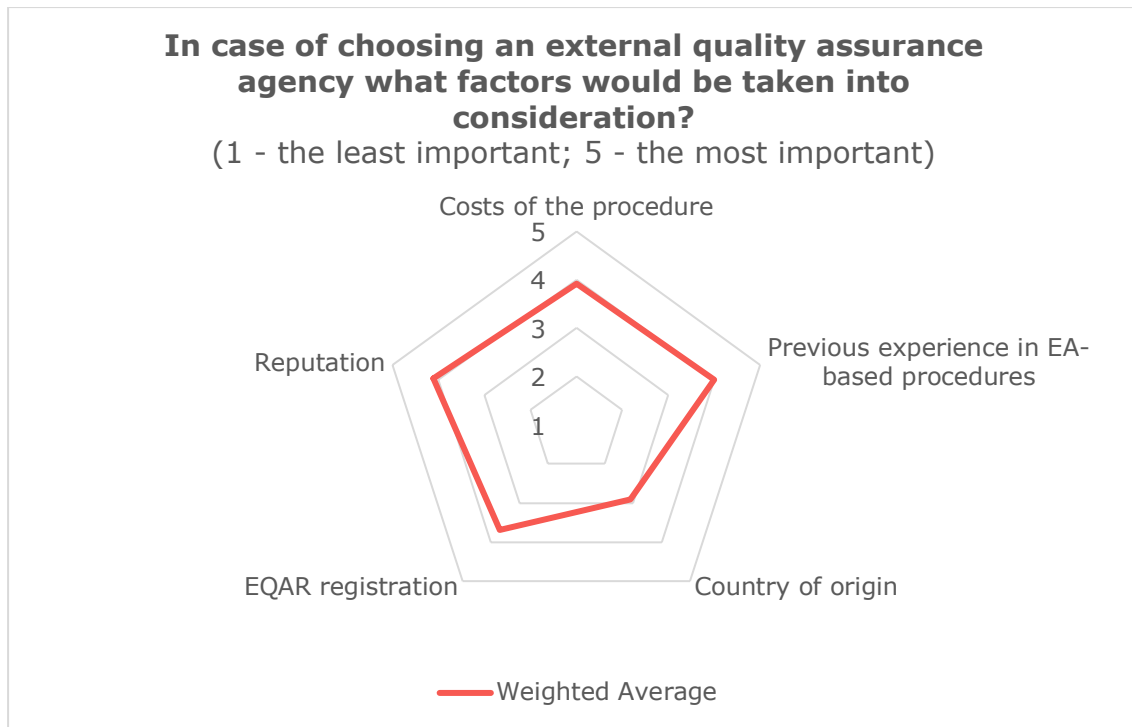
Figure 8 Factors determining selection of an external quality assurance agency

ADDED VALUE OF THE EUROPEAN APPROACH

The European Approach was adopted based on a number of benefits it was expected to bring. Among these, specifically the ability of the Approach to evaluate the "jointness" of the programme and thus its specific character and added value; and to facilitate and rationalise the quality assurance processes making them less laboursome for higher education institutions. This latter was expected to encourage institutions to engage in more joint programmes by reducing the "red tape" attached.

To get a better understanding whether these expectations have been realised in practice, the survey asked the respondents to indicate what they saw as the main benefits of the European Approach. The most important ones are:

- The European Approach facilitates integrated approaches to QA of joint programmes

- External QA of joint programmes according to the European Approach reflects their joint character

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- The European Approach eases development of joint programmes by setting agreed standards and tools

- The European Approach is useful for internal QA of joint programmes (respondents from HEIs only)
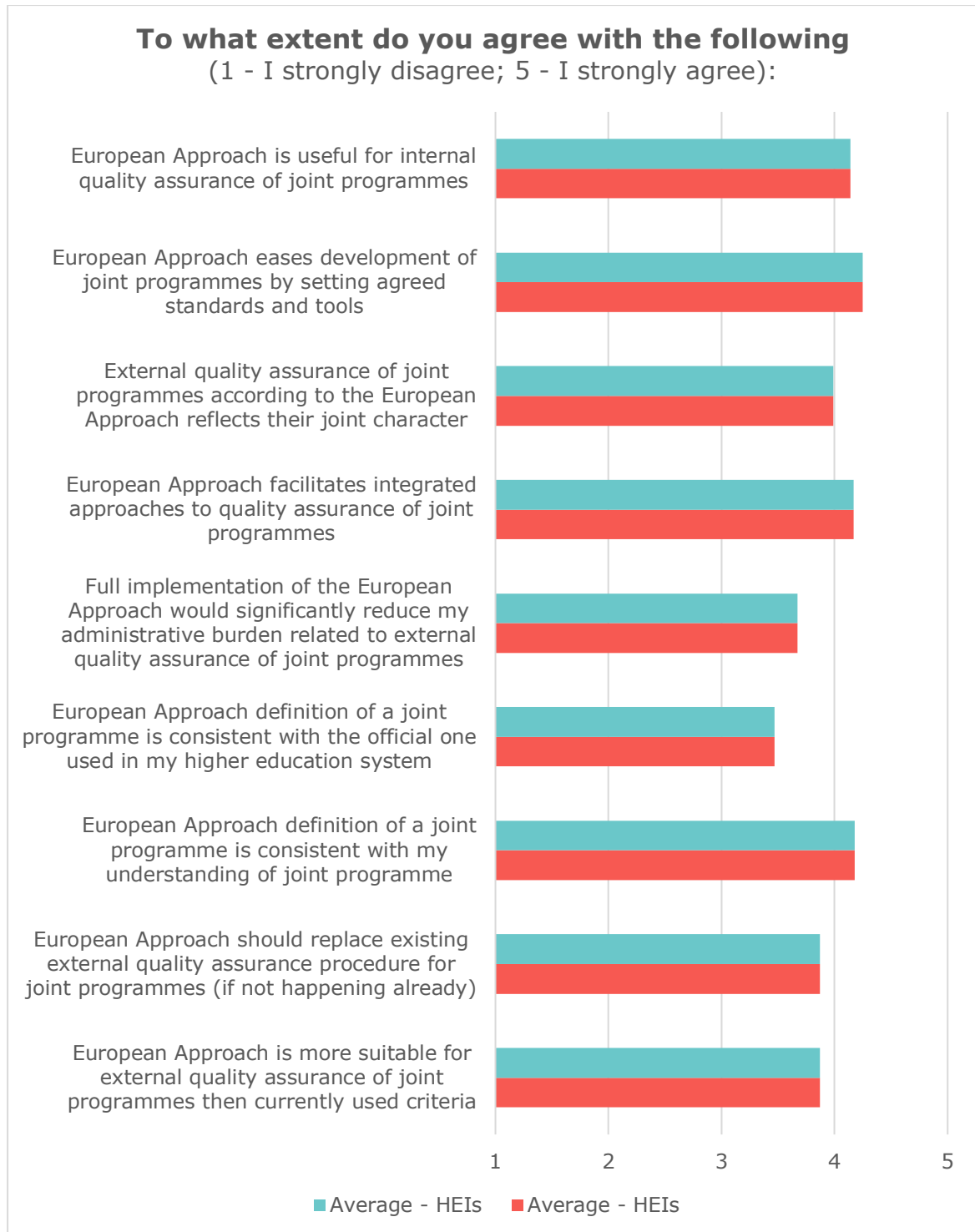
To what extent do you agree with the following
(1 - I strongly disagree; 5 - I strongly agree):

Figure 9 Perception of added value of the Europea Approach - higher education institutions and quality assurance agencies

There was a significant level of convergence in responses from higher education institutions and agencies, both groups agreeing on the first three statements as the priority, with institutions naturally giving greater importance to the usefulness of the European Approach for purposes of internal quality assurance.

The respondents did not however think that the full implementation of the European Approach across the EHEA would in the long term significantly reduce the administrative burden related to external quality assurance. This may be due to the national regulatory frameworks, which do not yet allow for smooth recognition of the European Approach meaning that it is often considered as a useful but additional layer of quality assurance.

Most respondents indicated that the definition of joint programmes is not common across different systems, and that the definition used in the European Approach itself is not consistent with the official one used in their own higher education system.

ACCEPTANCE OF THE EUROPEAN APPROACH AS VIEWED BY THE AGENCIES

Agencies were asked whether they accept evaluations by other agencies when carried out using the European Approach. As the below graph shows, a quarter of respondent agencies accept fully all accreditation procedures according to the European Approach if carried out by EQAR registered agencies. Another 23% accept them with some additional conditions and about 10% do not accept any such processes. This is often due to restrictions in the national legal framework, which does not foresee a procedure for such recognition, rather than due to unwillingness from the side of the agencies themselves.

The collected comments indicated, however, that this question was difficult to respond to, and consequently the results hard to interpret. Indeed, several agencies play no role in accepting accreditations decisions by other agencies, either because they do not take any accreditation decisions or because they do not deal with programme

accreditation. Therefore, the picture provided by the graph may be overly pessimistic, as several of the agencies responding "other" indicate that in their systems there is no need for acceptance of the outcomes at all.
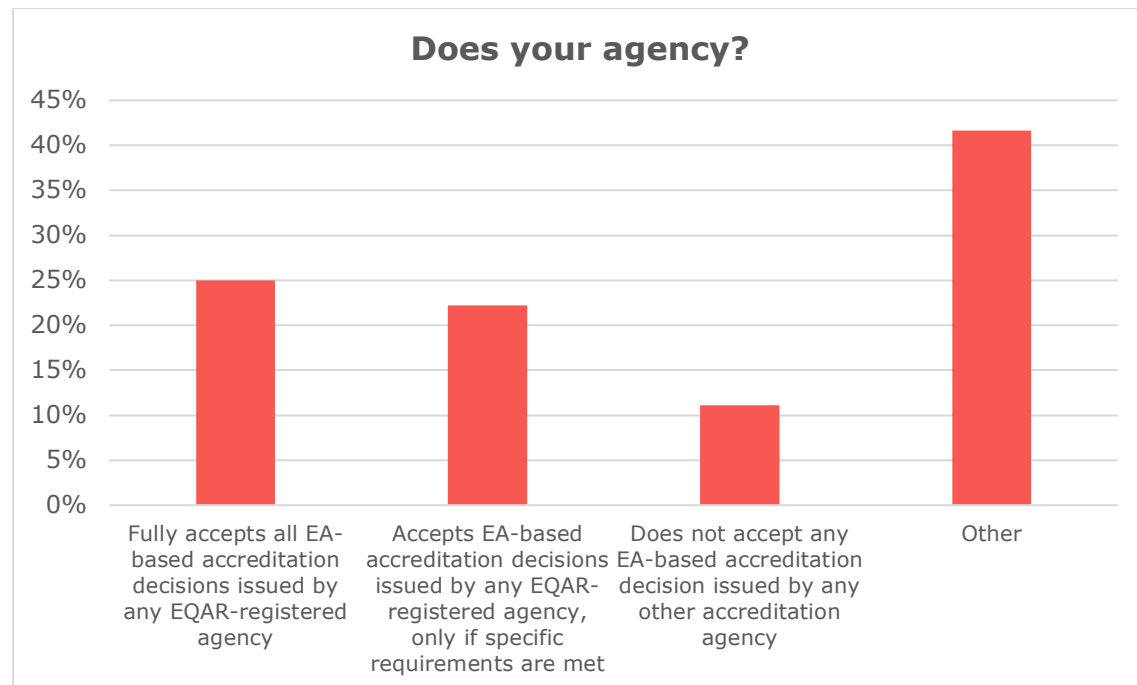
Figure 10 Acceptance of the EA-based accreditation decisions - quality assurance agencies

Above results can also explain the general confusion among higher education institutions concerning possibility of using European Approach as a replacement of the regular, mandatory external quality assurance procedures. More than 50% of the respondents from this group indicated that they do not know if such option is possible in their higher education system.

Figure 11 European Approach in national legistlations - higher education institutions

Main challenges in implementing the European Approach and how to address them

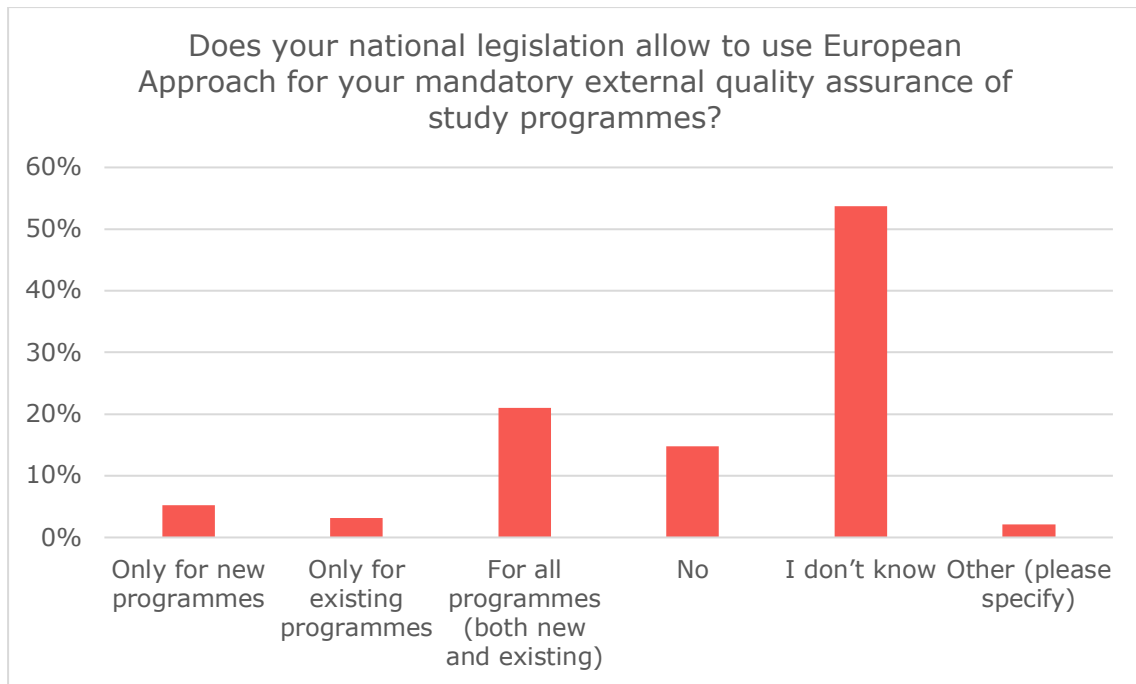In addition to the legal frameworks, which constitute the most significant challenge to the implementation of the European Approach, numerous others can be identified at different levels: national, agency, higher education institution, and consortium level. During the ImpEA project conference (1-2 March 2018 in Brussels) the participants spent some time collecting and enlisting the challenges faced in the quality assurance of joint programmes and – where available – with the use of the European Approach.

Challenges were identified in a number of areas, including the following:
- *definition of terminology;*
- *eligibility to use the European Approach;*
- *administrative burden related to joint programmes;*
- *quality assurance;*
- *legislative frameworks;*
- *adequate information and relevant information sources.*

The list resonates strongly the findings of the survey results. Each of the identified areas attracted some ideas from the participants representing both HEIs and QA agencies (as well as governmental bodies). A number of issues raised were similar and conveyed related problems, anxieties and fears in relation to the European Approach.

The very **definition** of joint programmes and joint degrees, and their difference from double/multiple degrees caused confusion. The way the European Approach should and could be applied and interpreted, and when it can replace the existing external QA processes and criteria was unclear to most participants. It seems that clarifying definitions in the different national contexts, starting from the basic

assumptions, is needed in order to support further debate on, and implementation of, the European Approach. National definitions will naturally continue to vary across Europe, but it is important that those definitions are aligned with European definitions and that no new definitions that could undermine support for the European Approach are created.

Along with definition challenges, eligibility and legislative frameworks were brought up as significant challenges. Apparently, eligibility criteria are not as self-explanatory and obvious to the different stakeholder groups, either. The link between the **eligibility** for the European Approach, and compatibility with national procedures, was not univocally understood by the participants. Another problematic issue, as became clear already from the survey results, was related to the existing **legislative frameworks**. National regulations and criteria, institutions' own parameters and rules, and criteria set by the **quality assurance** agencies seem to remain a hindrance to the introduction of the European Approach. The participants agreed that it would be hard to fully implement the European Approach unless other existing requirements were adjusted accordingly.

The **administrative burden** perceived to be related to the European Approach, on the other hand, can stem from poor **information**. Participants were worried about the extra workload associated with the European Approach, while still having a strong sense of low level of information and awareness about it. Indeed, the European Approach is intended to reduce, not to increase, the administrative burden of external quality assurance on the programmes. It seems obvious, thus, that in addition to the persisting restrictions posed by the existing national frameworks, the perceived additional burden can be explained by a lack of adequate information on the use of the approach, knowledge on how to use it and when, and the still scarce number of good practice cases available. The participants agreed that without the right instructions and guidance, and reliable resources and tools, it would be hard for both the HEIs and the QA agencies to make use of the European Approach.

On the second conference day, group work sessions addressed those challenges and considered possible ways to address them to ensure better and easier use of the European Approach across Europe focusing on three specific challenges as the most relevant to the stakeholder groups present:

- *level of awareness about the Approach,*
- *administrative burden,*
- *information sources and provision.*

The participants were split into two groups: institutional and agency representatives. Each was tasked to elaborate more specific challenges within the wider areas identified, and to suggest ways in which those challenges could be addressed and overcome by the different stakeholder groups.

LOW LEVEL OF AWARENESS ON THE EUROPEAN APPROACH

In terms of national ministries and public higher education authorities, the participants identified as the most significant challenges the differences between the QA systems and regulations between countries and in relation to the European Approach; a lack of knowledge about the European Approach; and the difficulty to transfer national powers related to accreditation of programmes to other bodies, or to accept that different criteria from the national ones could be used.

There is also a lack of awareness about the European Approach at the higher education institutions. It is apparently not easy for the institutions to see what is the added value of the European Approach and what benefits it could bring to the faculties. The lack of cases of good practice makes it harder for institutions to see what the Approach means in practice and why they should engage with it. Particularly, it seems that the level of awareness about the European Approach may be particularly low in institutions that are not usually subject to programme accreditation and thus may fail to see its relevance for the joint programmes they are involved in. The

awareness may be low also because the European Approach concerns only a very small number of programmes. It is perhaps thus not a key concern or priority to institutions, and thus not necessarily integrated into the overarching institutional policies.

The most natural solution to lack of awareness is – of course –better information on the European Approach. Proposed practical ways to address this include the creation of a **general platform** where all information, including case examples, could be found and consulted. The platform could also contain a toolkit for the implementation of the Approach; a link to EQAR for the **list of registered agencies** who could carry out the procedures; as well as a **section with FAQ**. The national quality assurance agencies may also offer themselves as fora to share knowledge and experience on the quality assurance of joint programmes in general and the use of the European Approach in particular.

A two-way information flow was proposed for the higher education institutions: "top-down" from the QA agencies to HEI management and "bottom-up" from quality assurance experts to peers. It would also be important to look for, collect, and share concrete examples of the identified benefits of the Approach and communicate those appropriately, both internally within the programme, faculty and institution, as well as externally. It became very clear that having more **case examples** to work with would be very important. It would be thus highly beneficial to find consortia willing to apply for accreditation using the European Approach.

ADMINISTRATIVE BURDEN

In terms of the administrative burden involved, it became fast apparent that the perceived problem is not specific to the use of the European Approach, but rather a generic issue related to the creation, management and running of joint programmes in general. The European Approach is intended to reduce the QA-related administrative burden, but joint programmes remain highly complex projects and require substantial amounts of human resources. There

is a perception that the additional workload inherent in the creation of joint programmes is not always recognised and adequately supported.

When considering the administrative burden related specifically to the use of the European Approach, **language requirements** came up as a key issue: some institutions pledged that the consortium language (or the local language of one of the institutions) should be accepted by the agency carrying out the procedure in order to avoid the need to translate substantial amounts of documentation. At the same time, in order to enable acceptance and understanding of the outcomes across Europe (and even simply within the consortium, or the society at large), the European Approach advocates the use of English, with the minimum expectation that a summary of the outcomes and the decision be made available in English. Should this not be possible, timing and budgeting of the review process should take translation requirements adequately into account.

The European Approach is seen as a way to ease the administrative burden on joint programmes. However, for this to happen, people need more and clearer information on its use and validity and the legal frameworks need to be clear about the recognition of the European Approach without additional steps and criteria. It was proposed that institutions might need to engage in a dialogue with the national authorities, and lobby for the full adoption of the European Approach. In the Paris Communique' of May 2018 the EHEA Ministers made a renewed commitment to the European Approach: "In order to encourage the development of more joint programmes and joint degrees, we will also enable and promote the use of the "European Approach for Quality Assurance of Joint Programmes" in our higher education systems."[6] This gives new momentum to create pressure for the full implementation of the Approach across Europe. It is clear that unless the regulatory frameworks are adequately adjusted, there is a real - or perceived risk – that the national

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[6] Paris Communique', May 2018 -
http://www.ehea.info/media.ehea.info/file/2018_Paris/77/1/EHEAParis2018_Communique_final_9527
71.pdf

legislations could limit or stop the creation of a new joint programme, or terminate an existing one, or the quality assurance processes related to them, in cases where the European Approach has been used.

COMMUNICATION AND SOURCES OF INFORMATION

Information on the European Approach and its use is clearly lacking, or institutions do not know where to get such information. Firstly, there is a need to have a clear access point to information on the legal frameworks for joint programmes in each country, including the conditions related to the use and/or recognition of the European Approach. As described above, in many cases there is no simple "yes-no" answer to whether the European Approach may be used, the "yes" potentially hiding some additional conditions or administrative steps prior to recognition, or the "no" actually applying only to certain types of programmes or institution. It is clear that institutions do not only need such information on their partner institutions' countries, but also on their own national context, as such information is not always easily available. Thus, **more and clearer details on the frameworks** are needed. This information could be contained in the platform proposed above, so that there is one clear entry point to all relevant information on the European Approach.

Second area of information that needs to be better compiled and disseminated relates to the **practical use of the European Approach**, such as how to start a QA procedure using the European Approach; what elements will need to be taken into consideration; and which steps (and timelines) have to be planned for. The HEI representatives agreed that such basic information should be available at their national QA agencies. The common information platform should thus include guidelines on the use of the Approach, to-do lists with clear indication of the related actors involved, details of the procedures and steps to be taken, and some examples of good practice (with contact details for further information).

CONFLICTING CRITERIA AND MISMATCHED TIMELINES

The main challenges identified and discussed at the ImpEA seminar in March 2018 do not provide an exhaustive list of possible challenges. The HERE-ES-project (in 2016) on Quality Assurance of Joint Programmes[7] highlighted as an additional challenge the lack of alignment of the criteria and timelines between countries.

Naturally, the European Approach, if fully implemented, is intended to solve the issue of conflicting criteria by providing a commonly agreed set of standards that can be applied across the EHEA, without the addition of any national requirements.

In terms of timing of the QA processes, the issue is more complex and not easily resolved by the European Approach alone. Not only is the six-year cycle of the European Approach different from programme accreditation cycles in some of the EHEA countries (these would typically vary from five to 10 years). Additionally, joint programmes that are composed of parts of existing national programmes may face hypothetically situations where in the middle of the European Approach cycle one of the partner institutions loses the (national) accreditation of the (national) programme that forms a part of the joint programme. This could lead to a situation where the accreditation through the European Approach is still valid, but potentially one of the partners becomes unable to deliver their share of the programme if the original programme is no longer accredited nationally. In a less grave scenario, a programme may be trapped in being evaluated at short intervals if the evaluation of the joint programmes is done in year 1, for example, and the evaluation of the national programme in year 3. Instead of a six-year cycle, the programme or parts of it end up being evaluated every 3 years. This defeats the purpose of the European Approach to reduce the EQA burden on the institutions. For the moment, there is no easy solution to this issue, as long as national regulations do not make it possible

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[7] https://sede.educacion.gob.es/publiventa/higher-education-reforms-in-spain-here-es-project-quality-assurance-of-joint-programmes/educacion-universidad/21350

to follow the six-year cycle in the European Approach, including joint programmes that are composites of already existing national programmes at the different partner institutions.

Why bother - the added value of the European Approach (outcomes from ImpEA conference working groups)

The use and implementation of the European Approach is complex at all levels, and the amount of challenges seems at moments insurmountable. Why should we bother? As described also above, the European Approach, when adequately implemented and used properly, is expected to bring a number of benefits. The topic of the added value of the European Approach was picked up by the ImpEA conference working groups, which were able to identify a number of additional benefits to those identified by the Approach itself.

For **institutions and programmes**, the European Approach is expected to reduce quality assurance related administrative burden and cost, as only one procedure, rather than several, need to be taken. The integrated evaluation also ensures a focus on the programme and its content, rather than on procedural elements. The European Approach provides further international exposure to the institution and may support the attraction of more international students and contribute to the raising profile of the institution. It is seen as a potentially powerful instrument to take forward institutional internationalisation strategies. It is also believed that the use of the European Approach may enhance the internal QA processes as it pushes institutions to look at their joint programmes "as a whole". By using the European Approach the institution can choose an agency it considers as most appropriate for its needs (from among the EQAR registered agencies), giving them more freedom in respect to the external quality assurance processes. A possible side-benefit identified by the participants was the potential for internal capacity building and benchmarking.

The European Approach can be a "wake-up call" for the **national authorities** and alert them to the challenges related to accreditation

and quality assurance of joint programmes. At the same time, the ministries do not need to create a system to address those challenges, but simply implement what has already been created (and agreed on). The Approach might also be used to develop a "European brand" in the national context. Standardisation of QA processes could also facilitate mutual understanding about the similarities and differences in the various systems and thus provide a platform for exchanges between the countries. Facilitating accreditation is expected to make it more interesting and less burdensome and risky for institutions to get involved in joint programmes, which can support student mobility, international visibility and attractiveness of the higher education system more widely. This could have a positive knock-on effect also on research cooperation internationally. Joint programmes bring in international students and help to create a more international environment "at home", which can bring added value to the local students, too. In short, the European Approach can be used as a strategic tool for internationalisation and competitiveness. The European Approach could be used as a "quality label" for joint programmes. Finally, an effective incentive for the countries to implement the European Approach may also simply be to "look good" in the next Bologna Process Implementation report.

The **quality assurance agencies** could expect to benefit from the European Approach, too. The participants identified the following possible advantages:

1. *Improvement of the **visibility and credibility of the agencies** who carry out quality assurance activities using the European Approach;*
2. *Contribute to **building trust** among the agencies, as they learn from each other and share information on the processes;*
3. *Mutual sharing of experiences could support **internal learning and staff development** within the agencies;*
4. ***Reduced administrative burden** as a single procedure and one set of standards is used for all joint programmes. The assessment is simplified as only one agency is running each*

procedure and there is less work for those agencies who are not in charge of the evaluation. There is no need to create joint procedures for each programme separately;

5. **Competition between agencies** *may also be good for the quality of the services offered by the agencies.*

At the European level, the use of the European Approach is expected to raise the profile and visibility of the ESG themselves.

Conclusions

It is clear that while the European Approach is still little used, and national regulatory frameworks slow to adjust to enable and facilitate the use of it, the situation is constantly evolving. More attention is given to the topic at national and European levels, not least as the Paris Communique' of the EHEA Ministerial Conference in May 2018 in Paris renewed the commitment to enable and promote the use of the European Approach. We can thus reasonably expect more changes in national systems and a larger number of case examples in the coming years.

Some priority areas of action already highlighted by the FaBaToII project coordinated by Nuffic (2017) include:

- *Need to engage national authorities to take a step forward to enable the efficient use of the European Approach across the EHEA*

- *Creating new case examples of quality assurance processes using the European Approach.*

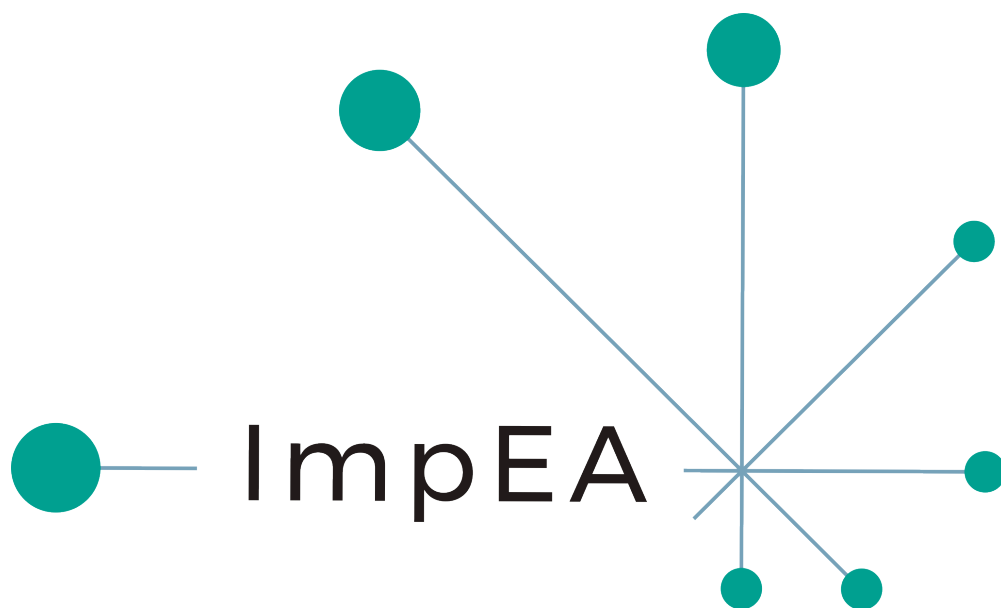- *Need to improve information on and understanding of the European Approach and its use*

The ImpEA project will address all three areas, with a specific focus on the latter two. Proposed practical ways to address the need for more and better information include the creation of a **general platform** where all information, including case examples, could be found and consulted. The result of the online survey and the discussions during the ImpEA project seminar clearly indicate that such source of information is needed and expected. As indicated by the participants of the project event, the platform should contain a toolkit for the implementation of the European Approach, including practical guidelines such as how to start a QA procedure using the European Approach; what elements take into consideration; how to plan the procedure. Furthermore, it should also contain a link to EQAR

for the list of **registered agencies** who could carry out the procedures; as well as a **section with FAQ**.

The online toolkit should also provide clarification in the following areas:
- *the added value and reductions of the administrative burden*
- *the definition of a joint programme*
- *some standards: eligibility, transparency and documentation, internal QA*
- *the six-year cycle in the European Approach in view of national legislation*
- *the acceptance of decisions based on the European Approach in EHEA countries and beyond.*

Finally, the results of the online survey show that there is also room for the national quality assurance agencies to offer themselves as fora to share knowledge and experience on the quality assurance of joint programmes in general and the use of the European Approach in particular.

ImpEA

Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes

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