

# External quality assurance in the EHEA

A report on the activities and perspectives  
of quality assurance agencies



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<sup>1</sup> In some cases, the presented data add up to more or less than 100% due to rounding of percentages.

## Introduction

This paper presents some of the key findings of a recent survey to quality assurance agencies conducted as part of the QA-FIT project (Quality Assurance Fit for the Future). The aim of the project is to map current practices in internal and external quality assurance and explore the perspectives of key stakeholder groups on the fitness for purpose of the European quality assurance framework with a view to informing a revision of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

The survey was open from November 2022 to January 2023 and disseminated to all ENQA member and affiliate quality assurance agencies. Similar surveys were sent to higher education institutions, students and governments by their respective European membership bodies (EUA, EURASHE, ESU and EQAR). This paper is one of a series being published by the project consortium to highlight the key trends within each stakeholder group, explore similarities and differences in perspectives across stakeholders, and set out some of the main questions for further discussion with regards to the future of quality assurance in the European Higher Education Area (EHEA).

It is hoped that this paper will provide data and information of interest to the quality assurance community, while also serving as a solid basis for further consultation on key issues related to the ESG.

It addresses three main topics: a mapping of current activities of quality assurance agencies, an exploration of agencies' responsiveness to current issues in higher education, and a summary of agencies' perspectives on the use and future development of the ESG.

## Profile of responding quality assurance agencies

The survey was answered by 76 quality assurance agencies located in 45 different countries (see Fig.1). Respondents included 51 ENQA members (all based within the EHEA), 18 ENQA affiliates based within the EHEA (of which 11 are actively working towards ENQA membership and one demonstrates ESG compliance through EQAR registration), and two ENQA affiliates based outside the EHEA (from Kosovo and Israel).<sup>2</sup> With responses from 93% of ENQA members, the results can be viewed as very representative of the external quality assurance sector in the EHEA.

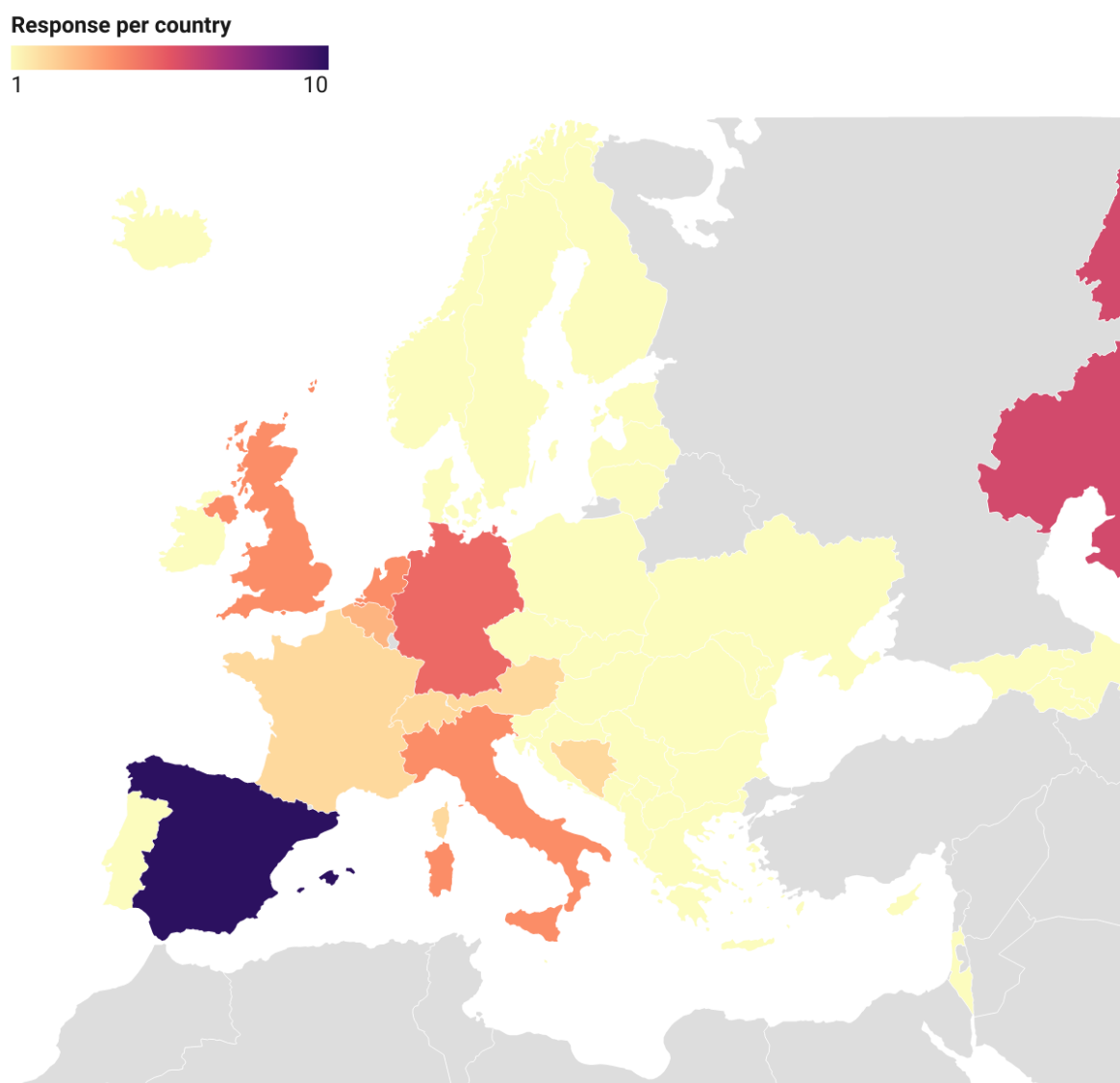


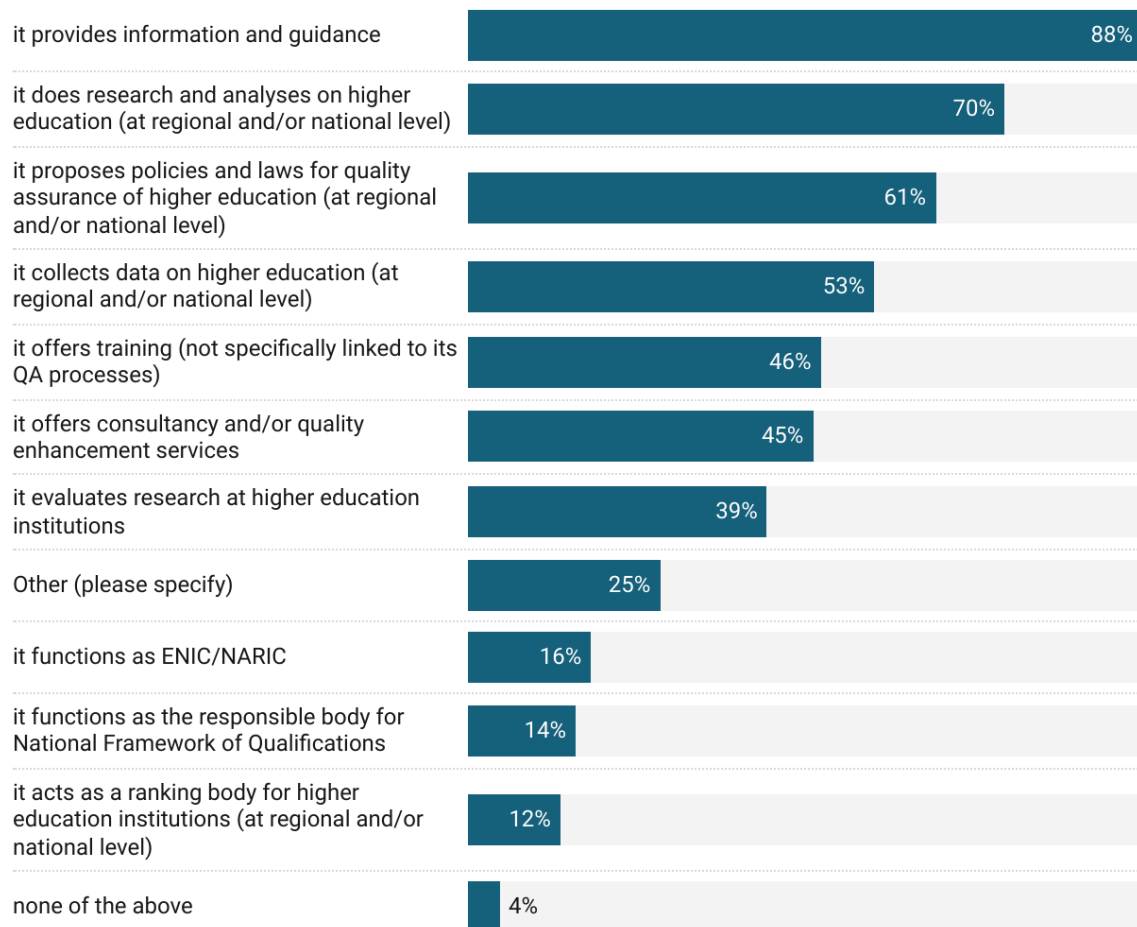
Fig. 1: Countries where responding quality assurance agencies are located

<sup>2</sup> ENQA members are quality assurance agencies based in the EHEA, which have demonstrated their substantial compliance with the ESG through an independent external review. ENQA affiliates are organisations worldwide with an interest in quality assurance, some of whom are quality assurance agencies. The survey was open to ENQA members and to affiliates that are quality assurance agencies (except those based in Russia, whose membership is suspended due to the invasion of Ukraine). ENQA membership status is correct as of the closing date of the survey (January 2023). Some affiliates have in the meantime become ENQA members.

The vast majority of the responding agencies (78%) conduct most of their external quality assurance activities in the EHEA, 20% are active in the EHEA and other regions. Of those that are active outside the EHEA, the regions covered include Asia Pacific, Africa, Latin America and Caribbean and the Middle East. 82% of the agencies operate primarily within a specific national or system-level context (though this does not exclude some cross-border activities), while the others operate across Europe or internationally and are not tied to any specific national legal framework.

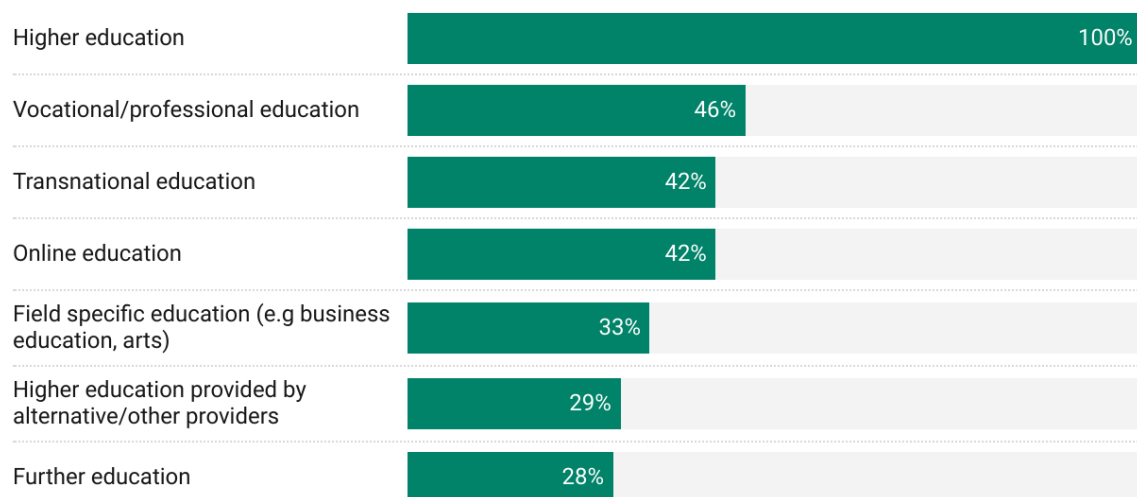
The background data about the responding agencies confirms the diversity of profiles and remits of organisations with responsibility of quality assurance. Besides being an external quality assurance body, 88% of the agencies also have the role of providing information and guidance, 70% conduct research and analyses on higher education (at regional and/or national level) and 61% have a mandate to propose policies and laws for quality assurance of higher education (at regional and/or national level). While these activities are clearly linked to the external quality assurance role, some agencies also have other functions, or are incorporated within a larger organisation with a broader remit, including for example the role of ENIC-NARIC (16%) or the body responsible for the national qualifications framework (14%) (see Fig. 2). In these cases, the degree of integration and cooperation between the different functions may vary considerably.

In terms of educational sectors, all the responding agencies cover the higher education sector, 46% cover vocational/professional education, 42% cover transnational education, and another 42% cover online education providers (see Fig. 3). Only 18% of the agencies focus only on higher education while all the rest cover at least two sectors, though it should be noted that the legal and practical differentiation, if any, between the sectors varies considerably from one country to another.



Besides being an external quality assurance body, what other functions does your agency fulfil?

Fig. 2 Additional functions of organisations serving as quality assurance agencies



In which sector is your agency active?

Fig. 3 Education sectors covered by quality assurance agencies

## Defining and operationalising external quality assurance

### Purposes of quality assurance of higher education

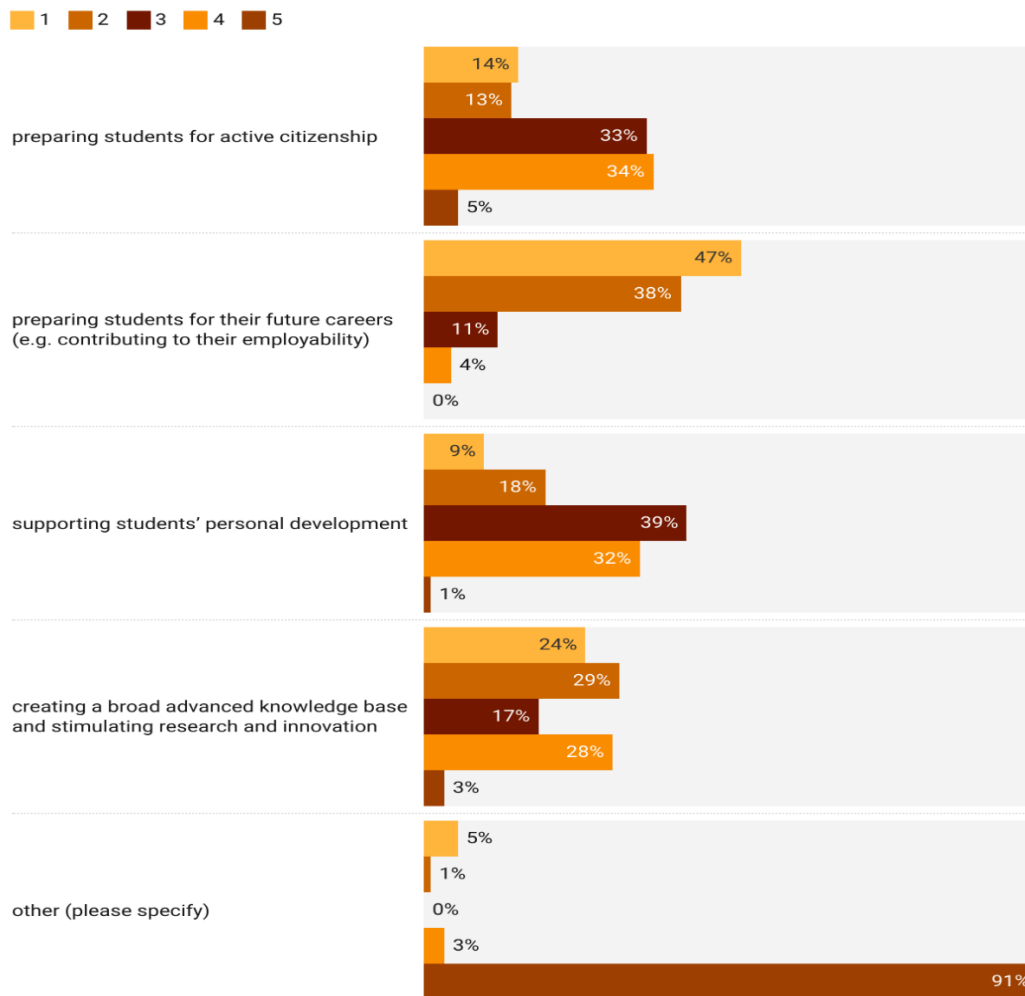
The information collected from the survey highlights the range of dimensions on which agencies may differ in their scope, methodologies and procedures, within the framework provided by the ESG. The ESG is a set of standards for quality assurance and not for quality itself. The framework emphasises a context sensitive approach to quality assurance, in which the key actors define quality in their own setting. Almost three quarters (71%) of the surveyed agencies report that their strategic documents include a definition of quality in higher education. These definitions range from being quite broad and conceptual to relating specifically to the agencies' standards and criteria. Aspects that appear most commonly in the definitions and explanations provided by agencies include (in order of frequency): principles and standards for quality (including the importance of external evaluation); quality culture and continuous enhancement; focus on academic quality; international profile and cooperation (of the higher education sector). However, it should be noted that, as with all answers to the survey, the input is self-reported and may be influenced by different understandings of the term 'definition' and the sometimes unclear distinction between defining quality and defining quality assurance.

Some agencies that reported not having a definition explain that the main reason is that they recognise the difficulty of defining quality of higher education, which is a multidimensional concept varying according to the context and study field and, in line with institutional autonomy, they see higher education institutions (HEIs) as being better placed to define it. Others see no need for a definition because they rely on the national standards, the definition included in the law, or they recognise the definition given in the ESG.

Given the important role of agencies in assuring the quality of higher education, the definitions of quality and quality assurance of higher education are very intertwined and naturally the results of the external quality assurance procedures are seen as an indicator of quality of higher education.

As the concept of quality in higher education relates to the fitness for purpose of the education provision, agencies were asked to rank the four purposes previously defined by the Council of Europe, namely "preparing students for active citizenship, for their future careers (e.g. contributing to their employability), supporting their personal development, creating a broad advanced knowledge base and stimulating research and innovation" (ESG 2015, p. 7). Preparing students for their future careers was ranked as very important and important by 85% of agencies, making it clearly the purpose with most relevance for the work of agencies. Creating a broad advanced knowledge base and stimulating research and innovation came second overall, ranked as very important or important by 53% of agencies (see Fig. 4). It is notable that these two purposes are also the most tangible of the four, which may make them more identifiable in external quality assurance standards and criteria.



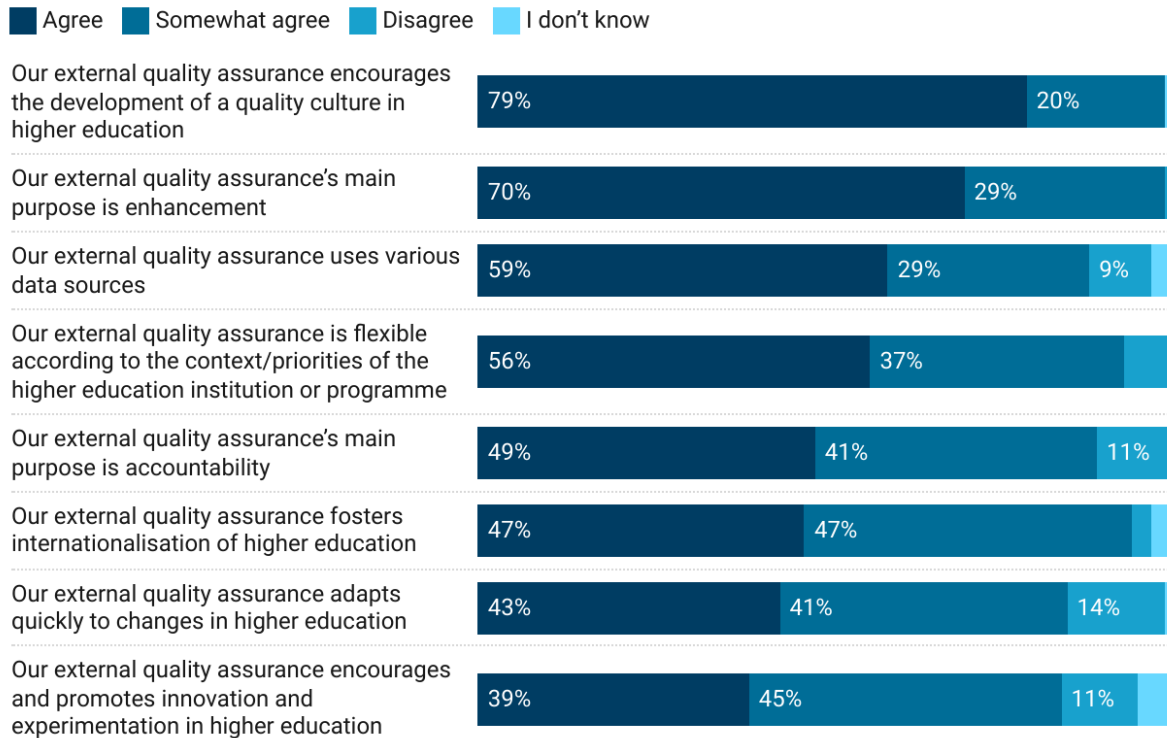


Please rank the following higher education purposes according to their importance for your agency

Fig. 4 Ranking of the purposes of higher education (1 = most important – 5 = least important)

When looking more concretely at the purposes of quality assurance, the dimensions that agencies identify with most are quality culture, enhancement and accountability, with over 90% of agencies agreeing or somewhat agreeing that these aspects were prominent purposes of their procedures (see Fig. 5). This aligns with the focus on these points in the purposes and principles of the ESG and reflects the well-established dual purposes of external quality assurance but with a slight emphasis on enhancement (it should be noted that 11% of agencies explicitly disagree that accountability is their main purpose). That said, results from another question show that 50% of agencies cite finding a balance between accountability and enhancement as being a challenge. Furthermore, the perceptions of other stakeholders regarding the purpose of the procedures may differ from the self-reported perceptions of the agencies.

The range of purposes of external quality assurance can also be viewed through the range of consequences. Agencies reported that a formal external quality assurance decision on institutional and/or programme accreditation (positive or negative) may have an impact on one or more of the following: HEIs' permission to operate, formal degree recognition, the public trust in and reputation of the institution, international cooperation opportunities, and funding. In some cases, a negative result in institutional accreditation leads to returning to programme accreditation.



To what extent do you agree with the following statements about your agency's external quality assurance procedures?

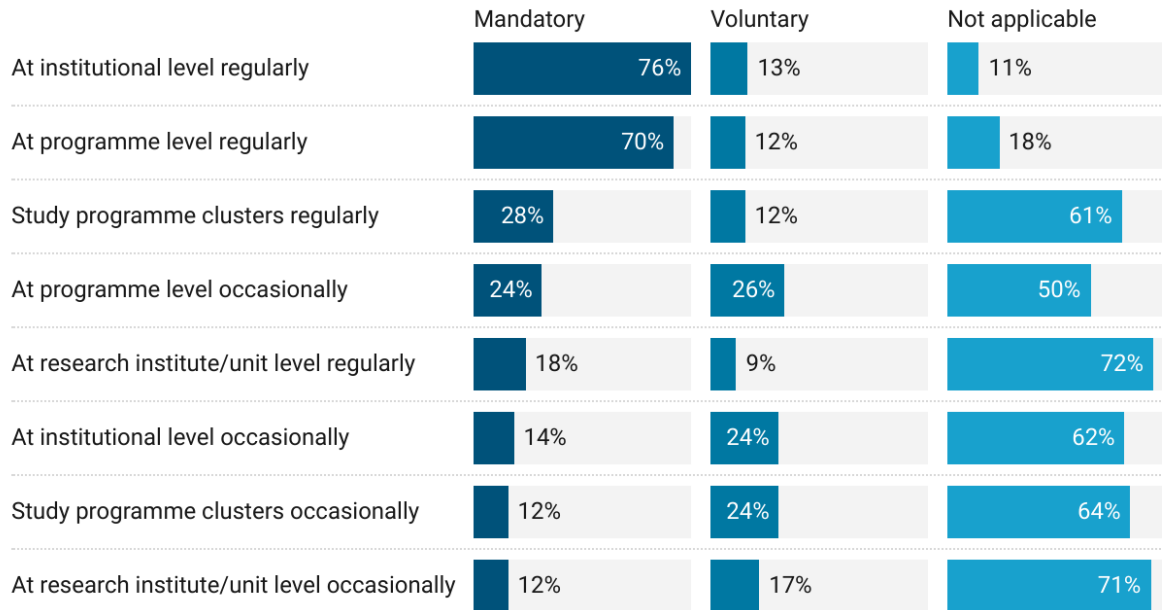
Chart: ENQA • Source: QA-FIT • Created with Datawrapper

Fig. 5 Perspectives on external quality assurance procedures

## Methods and approaches of quality assurance

Most of the responding agencies regularly conduct quality assurance that is mandatory for the HEIs. This is done both at institutional level (76%) and programme level (70%), while 28% of agencies evaluate clusters of study programmes (see Fig. 6). This aligns with other data about national legislative frameworks for quality assurance (e.g. from EQAR), which shows that most countries use a combination of institutional and programme level quality assurance. In some cases, HEIs can choose at which level to have their external quality assurance, while in other systems it is predetermined (e.g. programme and/or programme cluster evaluations are conducted at private HEIs but not at public ones).

Just over a third of agencies offer external quality assurance that is voluntary for the participating institution. In some cases, this means that the HEI may be able to choose which agency they wish to conduct an evaluation that is on top of their required external quality assurance, whereas in other cases it is due to the agency offering additional external quality assurance to fulfil specific needs e.g. subject-specific programme evaluation.

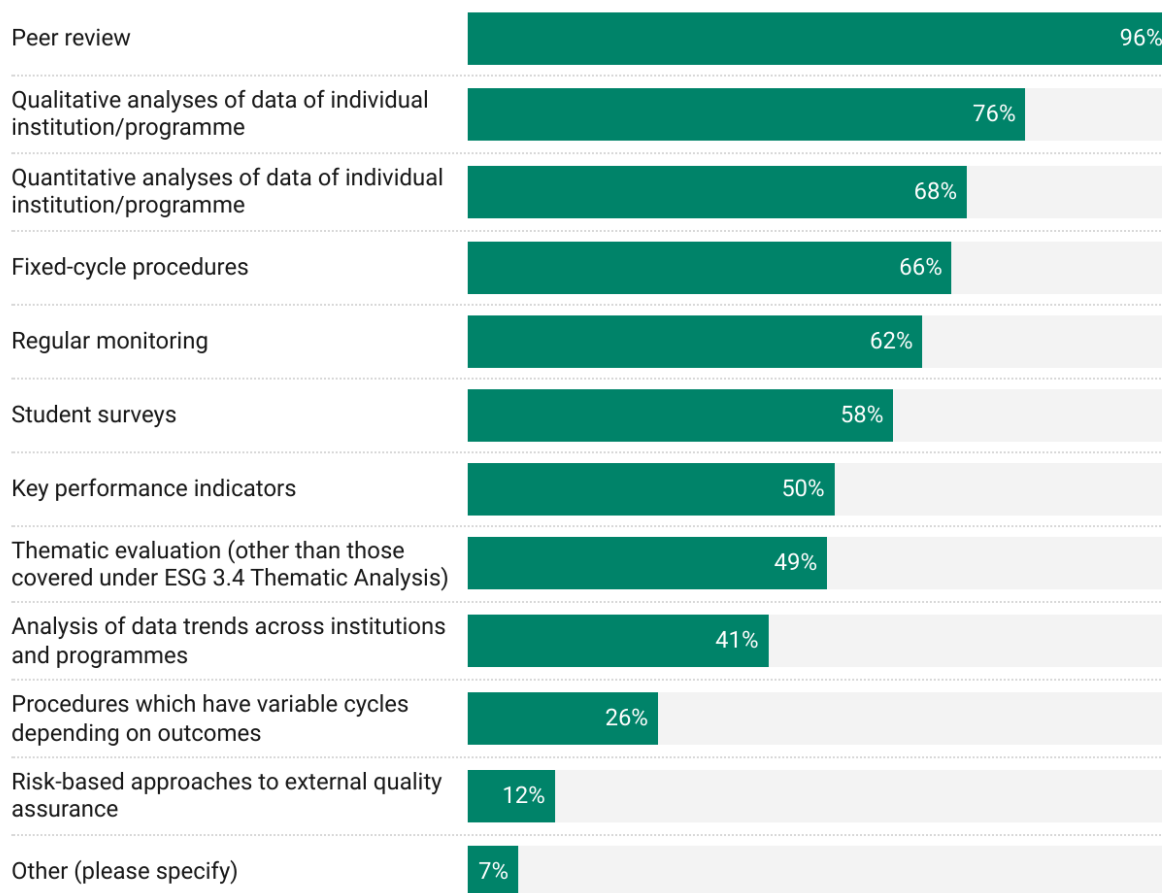


What external quality assurance approach does your agency apply?

Fig. 6 Approaches to quality assurance

The methods used by most of quality assurance agencies as part of their activities are peer review (96%), qualitative and quantitative data analysis (76% and 68% respectively) and fixed cycle procedures (66%). Of the methods listed in Fig. 7, all except five of the responding agencies use a combination of three and more of these. Most of the methods are explicitly or implicitly set out in the ESG as being the main tools for external quality assurance although there is flexibility in how they are applied. Agencies were also asked which other international tools or frameworks had an impact on their work, with the most common being the World Federation for Medical Education (WFME) standards, mentioned by five agencies. Others, mentioned by one or two agencies each, included standards by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and the Sistema Iberoamericano de Aseguramiento de la Calidad de la Educación Superior (SIACES), subject specific standards such as those for engineering and business education, and European tools or guidelines for research assessment.

Risk-based approaches are an emerging tool, with only nine responding agencies reporting that they use it. Of the agencies that provided additional details, two approaches can be identified. It can be a tool that initiates an external review procedure outside the usual cycle, due to a specially identified concern that requires further investigation, or it can be used to determine the format or areas for special attention within the regular cycle or procedures. Most of the responding agencies noted that data monitoring is used to identify and flag risks, while two also noted that complaints from stakeholders (including students and staff) can trigger a specific evaluation (though it is possible that this is done in other agencies but not specifically reported as a risk-based approach as it is not part of the systematic methodology). Justification for risk-based approaches include reducing the evaluation burden and making efficient use of resources. There is similar rationale for the use of variable cycles depending on evaluation outcomes, which can also be considered a form of risk-based approach (though not always named as such) and is used by about a quarter of responding agencies. Here the two main variables are the format and timing of the follow-up procedures and the length of the accreditation validity.



*What instruments/tools and approaches does your agency use as part of its external quality assurance activity?*

*Fig. 7 Tools used in quality assurance activities*

## Online education

The increased focus on online education, which although not caused by the Covid-19 pandemic was certainly intensified by it, means that in recent years many agencies have reflected on how they deal with this through their procedures. Digitalisation of learning and teaching is an aspect that agencies reported had a significant (47%) and some (53%) impact on their external quality assurance activities (see Fig. 13).

42% of agencies report being active in the online education sector and 94% address online learning and teaching to a large and some extent when evaluating an institution's internal quality assurance system (see Fig. 9). The difference between these figures can be explained by many systems not considering online education as being a separate sector i.e. that it falls under higher education if that is the level of qualification being offered. In comments to the survey, many agencies noted that evaluation of online education uses the same core criteria but with some adaptations to reflect the specificities of online education. Others drew the distinction between online and blended education offered by 'physical' HEIs, and online education offered by entirely online institutions.

## Internationalisation

The topic of internationalisation of higher education and specifically of quality assurance has taken on new dimensions since the approval of the 2015 version of the ESG. While

there are still challenges in the implementation of Bologna Process policy commitments regarding openness to cross-border quality assurance and the use of the European Approach for Quality Assurance of Joint Programmes, the European Universities initiative of the European Union has given added impetus to quality assurance in the international context.

It is clear that agencies perceive their own work as supporting internationalisation of higher education in general (94% agree or somewhat agree) and specifically that their practices for evaluation of internal quality assurance systems address this to a large or some extent (91%). Unsurprisingly however, 42% of agencies are not addressing activities developed as part of European Universities alliances, while 13% report not to know (see Fig. 12).

With regards to cross-border quality assurance, 45% of agencies report that they do this in addition to evaluations in the country where they are based. However, it should be noted that the results do not specify whether this is an occasional or regular activity, and for only a few agencies it is their primary activity. Almost a quarter of agencies noted that they can in theory operate in other countries, however this has only happened in practice a couple of times, or it is only in specific circumstances, e.g. for review of branch campuses. Twelve agencies (16%) reported that their legal basis does not allow them to operate outside their country of establishment.

With regards to joint programmes, 39% agencies reported that they evaluate joint programmes based on the European Approach for Quality Assurance of Joint Programmes. This seems quite a high number when compared with the actual number of procedures that are known to have been carried out (based on EQAR data). The additional comments to the survey explain that several agencies reported using the methodology if it is a legal or theoretic possibility, but it might not have been applied in practice because no request has been received or because they work in a system with institutional level external quality assurance and therefore it is not relevant.

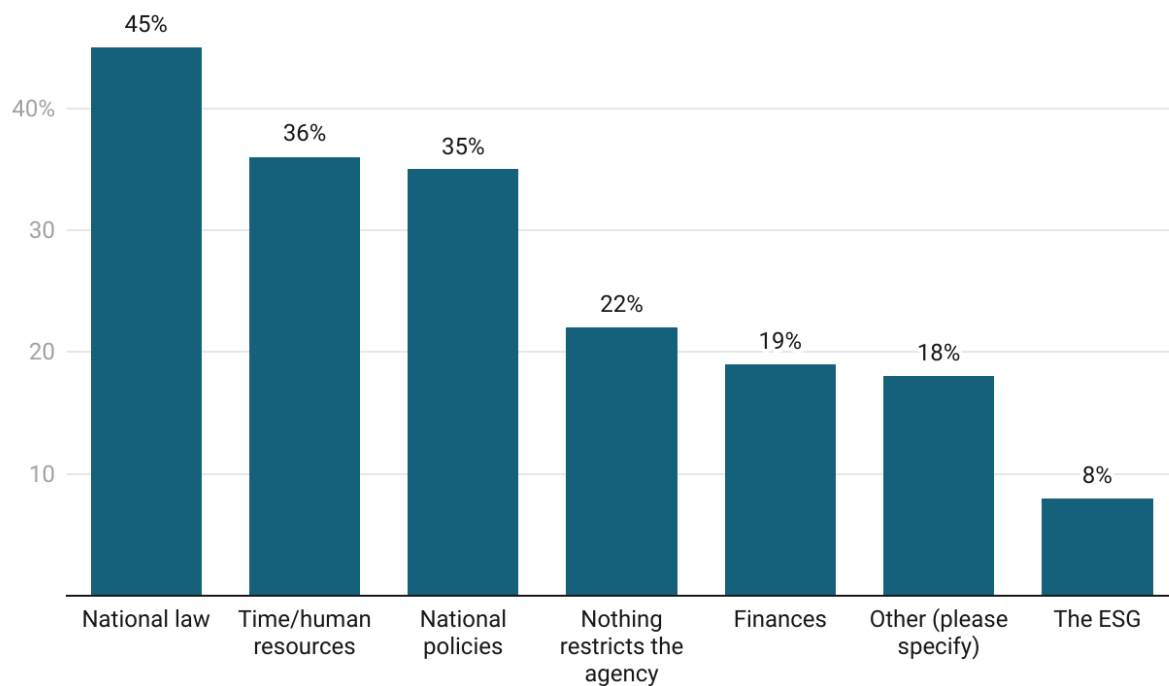
### Ensuring relevance of methodologies

As quality assurance agencies and the institutions that they work with continue to mature, it becomes more challenging to ensure that external quality assurance methodologies remain relevant and give added value. 57% of agencies cited this as a current challenge, making it the second most challenging aspect (see Fig. 14), while the need to respond to the rapidly changing higher education environment was the greatest challenge. To address this, many agencies make changes to their approaches and methodologies, either on an ongoing basis, or between evaluation cycles. The survey asked about initiatives taken by agencies to maintain the relevance and impact of their processes and 59 agencies answered that question. The two most cited initiatives were consultation with stakeholders (to explore future changes) and updating the framework or criteria, each mentioned by 22% of all agencies. Beyond this, 11% of agencies reported adapting their processes to more explicitly support improvement and enhancement at institutions (i.e. going beyond the accountability focus) and 9% of agencies referred more generally to continuous improvement of their own procedures. Other initiatives mentioned, by 5% of agencies each, were simplification of processes and using thematic analysis to identify potential improvements. Promoting institutional accreditation (over programme level external quality assurance) was mentioned by four agencies, suggesting that after transition periods in many countries, the shift from programme level to institutional level external quality assurance may be largely complete, or there is clear guidance on which approach is used in which circumstances (complementary data from EQAR shows that the majority of national quality assurance frameworks now use a combination of both approaches).

While concerns about the added value of their work is clearly a topic of discussion for many agencies, it should be noted that 7% of respondents answered that there were no such changes or discussions. This was usually because the agency is relatively new and currently conducting its first round of evaluations or because the agency offers voluntary evaluations that fall outside national legal requirements.

Looking ahead, the topic of simplification came up frequently in response to the open question of what agencies would like to change about their external quality assurance approach; it was mentioned by 14% of agencies, making it the most common wish of the agencies. Other wishes were to make changes in the legal framework (including to have more autonomy), to put more focus on enhancement, to make better use of data and digitalisation of quality assurance processes, and to increase international activities.

Quite predictably, the top reason given for not being able to make such changes was the national law, which was cited by 45% of agencies (see Fig. 8). Linked to this, national policies were mentioned by 35% of agencies. The other highly cited reason (by 36% of agencies) was time and human resources, which ties in with the fact that 50% of agencies noted heavy workload as being one of the most challenging current issues for their organisation (see Fig. 14). Notably, the ESG was the least selected restricting factor in making changes, putting into perspective some criticisms that the current framework prevents agencies from developing.



*What restricts your agency from doing that?*

*Fig. 8 Restrictions for agencies in implementing changes*

## Scope and responsiveness of external quality assurance

Activities of quality assurance agencies are affected and influenced by a complex web of factors, including the legal frameworks in which they operate, their own missions and strategies, developments within higher education, and more general, societal trends and global issues. This section explores some current key topics and how they are addressed by external quality assurance.

### Going beyond the scope of learning and teaching

The focus of the ESG is on quality assurance related to learning and teaching in higher education, including the learning environment and relevant links to research and innovation (ESG, 2015, p. 7). In this context, agencies very clearly make the link with education as something that prepares students for their future careers, with relevance of qualifications (59%), cooperation with labour market actors (57%) and quality of student internships/work-based learning (51%) being high on the list of areas covered to a large extent when evaluating internal quality assurance systems (see Fig. 9).

However, higher education is much more than the education provision activities, and data shows that when evaluating the internal quality assurance systems, many agencies go beyond learning and teaching. For example, a majority of agencies cover to a large extent broader topics of institutional management (72%) and participation of students and staff in higher education governance (70%), even though these are not explicitly in the ESG.

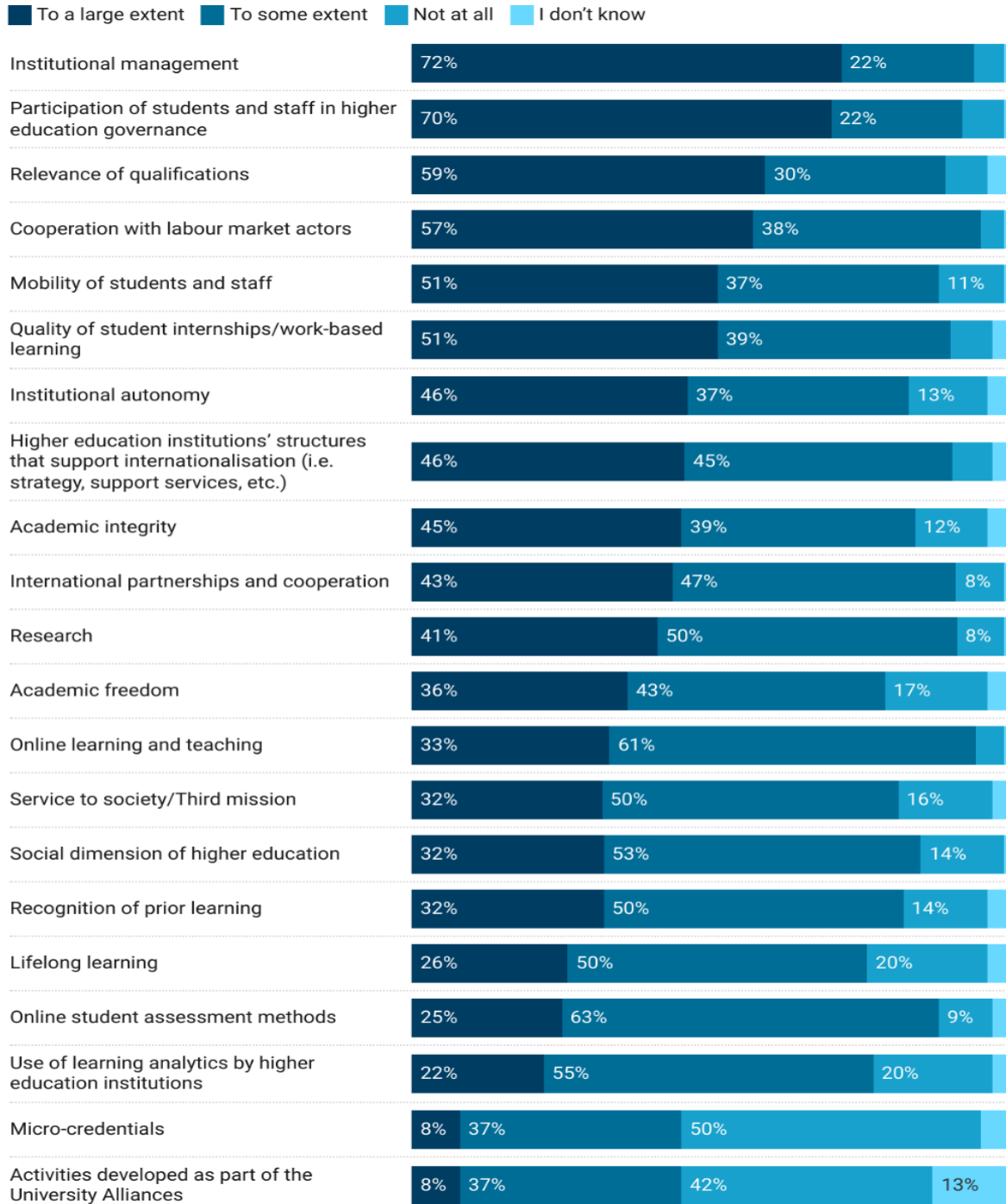
In addition, it depends which areas fall under the remit of the agency. For instance, research may not be evaluated to a large extent because there are other mechanisms or bodies covering it. In this regard, the data shows that for 72% of agencies (in case of regular evaluations) it is not applicable to have an approach for evaluations at research institute/unit level (see Fig. 6) and besides being an external quality assurance body, only 39% of agencies reported evaluating research at HEIs (see Fig. 2). The agencies covering research mainly address quality management and responsible conduct of research, including research ethics.

However, this doesn't mean that agencies do not consider research as an important area. Many address it in relation to the education provision ensuring that it is part of staff development, that the latest research and scientific developments are considered in the study programmes curricula and that academics guarantee and strengthen this link through their research competences and involvement of students in research activities.

53% of agencies consider the purpose of the higher education to create a broad advanced knowledge base and stimulate research and innovation to be very important or important. Moreover, if the scope of the ESG Part 1 were to be expanded, 72% of agencies would want research to be covered to a large (39%) or some extent (33%) (see Fig. 16).

Some agencies also make use of international standards or labels when reviewing quality assurance of research. Among these are the European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers, the San Francisco Declaration on Research Assessment (DORA) and the Coalition for Advancing Research Assessment Agreement on Reforming Research Assessment.





Considering the scope of your agency's external quality assurance approach(es), to what extent does it evaluate whether the internal quality assurance system addresses the following areas?

Fig. 9 Areas covered by quality assurance agencies when evaluating internal quality assurance systems

Other areas that are addressed to a large and some extent by the scope of external quality assurance by a significant number of agencies are service to society/third mission (82%) and lifelong learning (76%) (see Fig. 9).

The aspects related to service to society/third mission that are most covered by quality assurance agencies are engagement with industry (79%) and engagement with society (79%). Similar to the research area, many agencies address service to society to the extent



to which it is a priority for the institution and it relates to learning and teaching. For instance, the following aspects may be in focus: quality management of societal engagement and impact, participation of external stakeholders in quality management, engagement with external stakeholders and partners and how they are represented in institutional advisory boards, and alumni cooperation. Some agencies have a representative of the labour market or society at large as a member of the panel of experts conducting external evaluations, thus making sure that this area is properly explored.

Related to service to society is lifelong learning provision and its evaluation. Lifelong learning is addressed to a large or some extent by 76% of the agencies when evaluating internal quality assurance systems (see Fig. 9). The increased importance of lifelong learning has been identified as an aspect that has had a significant or some impact on quality assurance activities by 81% of responding agencies (see Fig. 13). However, 50% of agencies do not cover at all the area of micro-credentials, which can be offered as part of the lifelong learning provision. This may be because the topic is quite recent and it is either currently under discussion at national/regional level or the piloting of a quality assurance approach is underway with the results to feed into an agreed methodology in the near future.

### Social dimension and fundamental values

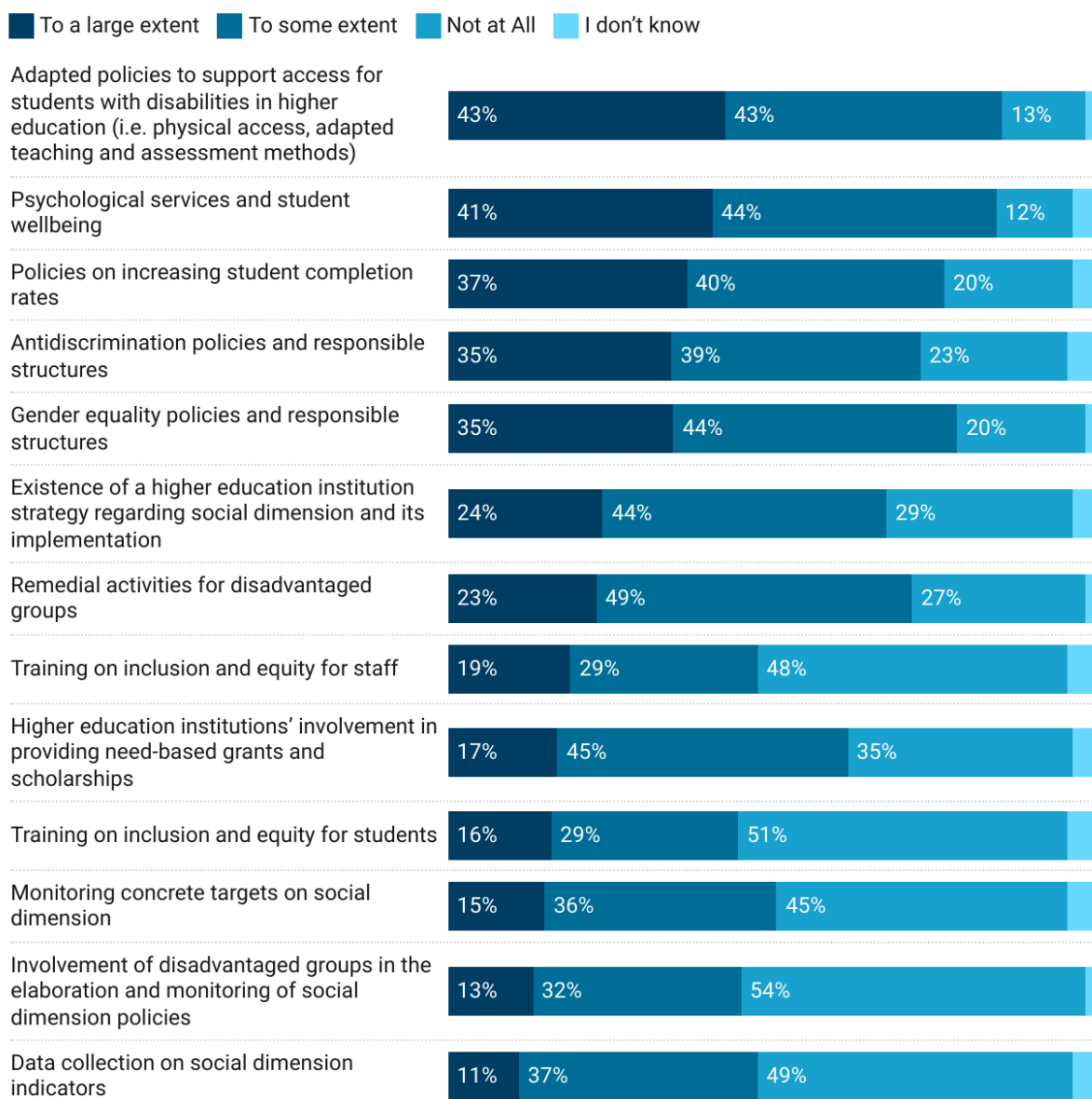
At the policy level of the EHEA, the topics of social dimension of higher education and fundamental values in higher education are being explored in more detail by the Bologna Process Follow-Up Group. Among the discussions is a debate around the role of quality assurance in evaluating and upholding these two issues. As such, there are calls for them to be more explicitly covered by external quality assurance. It is therefore important to reflect on the extent to which this is already being done by agencies as part of their existing processes.

#### Social dimension

Social dimension is an area covered by 85% of agencies to a large or some extent when evaluating internal quality assurance systems, while 14% agencies do not cover this area (see Fig. 9).

The most frequently addressed topics in this area were reported as: adapted policies to support access for students with disabilities, psychological services and student wellbeing, and policies on increasing student completion rates. The topics least addressed are: involvement of disadvantaged groups in the elaboration and monitoring of social dimension policies, training on inclusion and equity for students and staff, and data collection on social dimension indicators (see Fig. 10).

When asked about other bodies in their education system that evaluate the social dimension, responses can be roughly grouped as: ministry or other government body, HEIs themselves, do not know, and no other body is doing it. Several agencies noted that the question was not applicable for them as they were not tied to any specific national system.

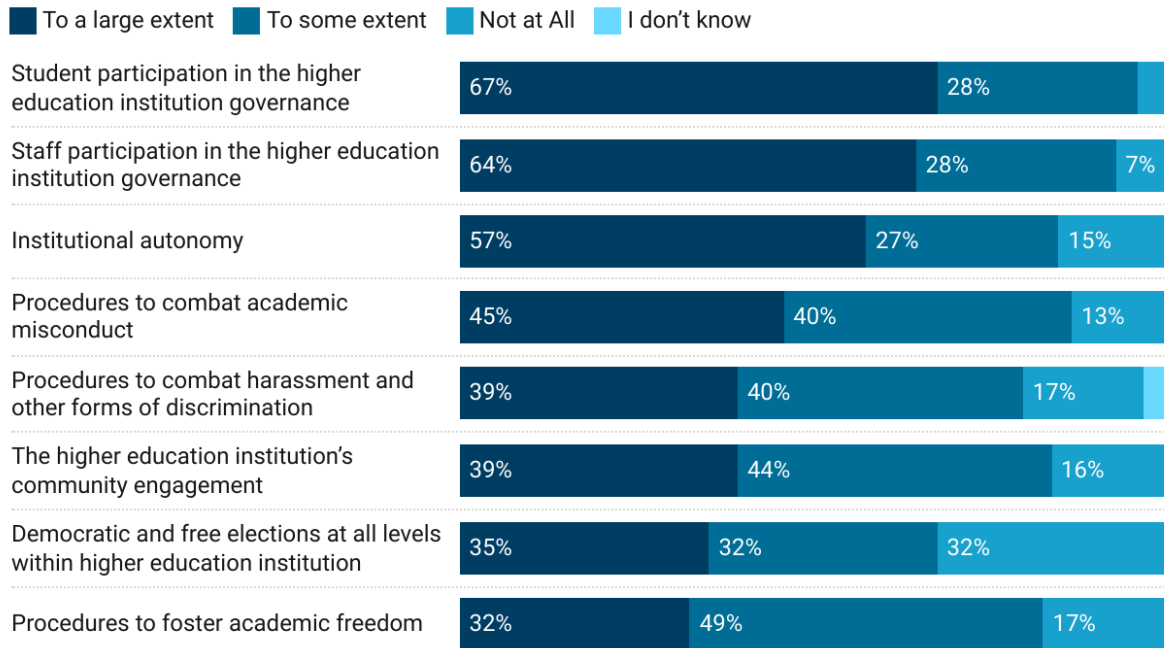


*To what extent are the following aspects of social dimension covered by the external quality assurance procedures of your agency?*

**Fig. 10 Aspects of social dimension covered by external quality assurance**

### Fundamental values

The aspects of fundamental values that are addressed by agencies to a large extent are student participation in governance (67%), staff participation in governance (64%) and institutional autonomy (57%) (see Fig. 11). This roughly corresponds with the responses to another survey question, which asked about the aspects of internal quality assurance that were covered by the agency's criteria. Other aspects that were well covered included academic freedom and academic integrity. The aspect of fundamental values that is least addressed (not at all) by agencies is democratic and free elections (32%).



To what extent are the following aspects of fundamental values addressed through your agency's external quality assurance processes?

Chart: ENQA • Source: QA-FIT • Created with Datawrapper

Fig. 11 Aspects of fundamental values covered by external quality assurance

Around half of the additional comments provided by agencies referred to these issues being addressed in some way through the legal framework (mostly in higher education legislation but in one instance under work environment law). As such it was not deemed in the scope of the quality assurance agency to address these issue as they were guaranteed by other mechanisms.

63% of agencies stated that they believe external quality assurance should directly evaluate whether fundamental values are respected in higher education (21% said no; 16% said don't know). The additional comments to this question demonstrate that it is a highly nuanced issue, and the points raised include: the difficulty to operationalise values into criteria for evaluation, the need to consider what is within the control of an HEI (rather than the broader system or society), the different types of agencies and remits, and differentiation between evaluating fundamental values and otherwise upholding or safeguarding them.

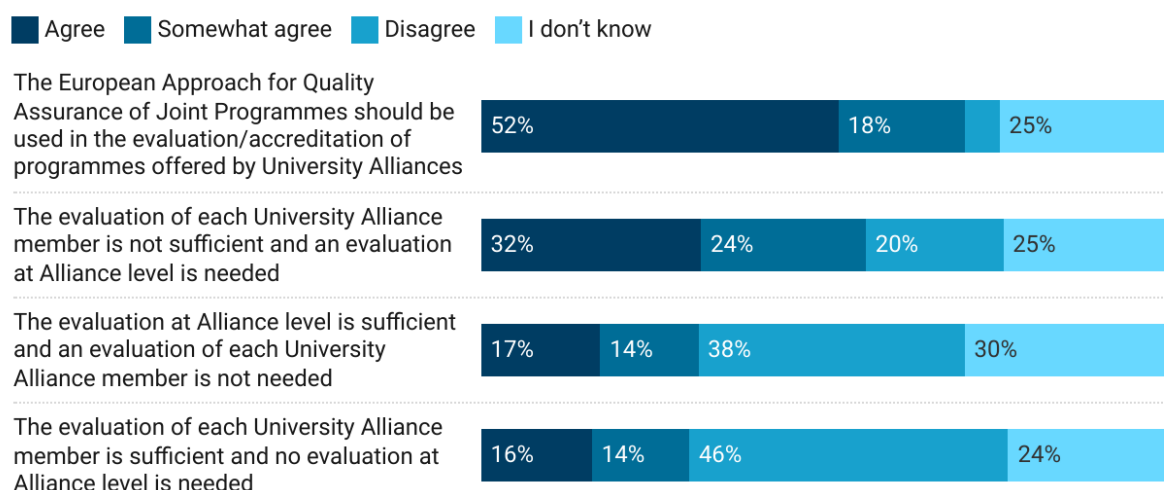
### European Universities initiative

Probably the most significant structural development in higher education in recent years is the European Union's European Universities initiative. The long-term sustainability and direction of the initiative is still unclear, but it has already raised questions regarding the quality assurance of joint activities undertaken by the alliances. 43% of agencies say that they do not take any action in this area. Perhaps more surprising is that 14% (11 agencies) report that they do evaluate alliances. However, it is not clear from the data whether this refers to a concrete activity that has already taken place, or a plan or theoretic possibility. Unsurprisingly, given the still relatively recent nature of the alliances, 42% selected the answer option 'other' to describe their activities in this area. In elaborating on the answer, some referred to concrete plans, while for others it is under discussion, or they have an interest in exploring this further. Four agencies specifically mentioned their involvement in the EUniQ pilot exercise, a project which tested a framework for external quality

assurance of alliances in 2020-2021. Several agencies indicated that they were waiting to see how the European Universities initiative developed before taking any specific action.

The views of agencies on the future quality assurance requirements for alliances demonstrate some trends but also a lot of uncertainty. Interestingly, with reference to the concrete tools already in place, 51% agree that the European Approach for Quality Assurance of Joint Programmes should be used in the accreditation of joint programmes offered by alliances. This figure appears quite low, but might be explained by the significant number of agencies coming from systems in which programme accreditation is not required and therefore use of this tool is not relevant.

The results show a general convergence of opinion that an evaluation at alliance level is needed in addition to the evaluation of individual alliance members, and that one or the other is not sufficient. However, the results also show a significant amount of uncertainty, with around a quarter of agencies selecting 'I don't know' for each statement about how alliances should be quality assured (see Fig. 12). The level of uncertainty reflects not just the novelty of the initiative but also the huge diversity of cooperation arrangements across the alliances, which vary considerably in both depth and breadth. The fitness for purpose of an alliance-wide evaluation procedure is strongly impacted by the scope and scale of the strategic integration of the alliance members, the nature of their joint activities, and particularly by whether or not those activities result in a formal qualification.

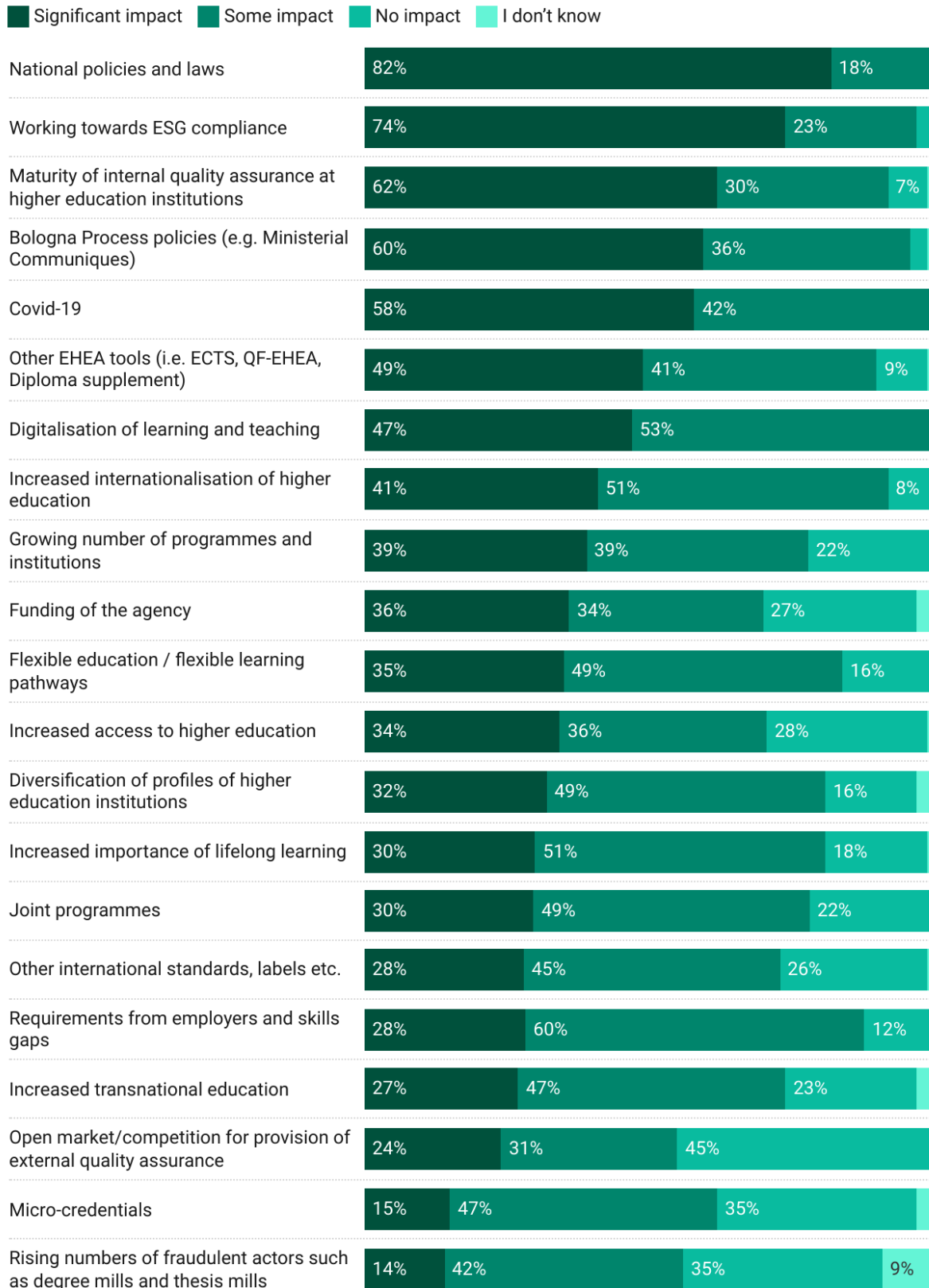


*What is your agency's view on the following statements related to quality assurance of University Alliances?*

*Fig 12 Perspectives on the quality assurance of European Universities alliances*

### Key issues for quality assurance agencies

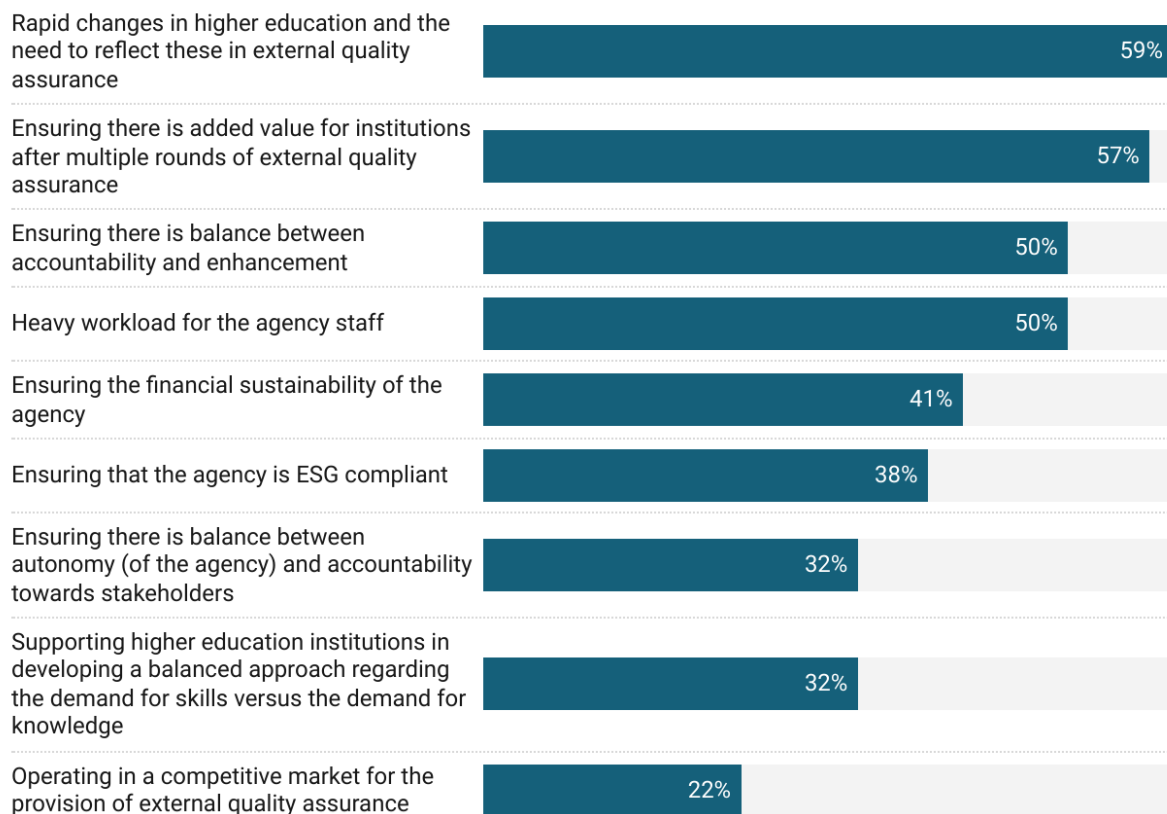
The majority of quality assurance agencies are highly dependent on the national or regional context in which they operate. National policies and laws were the most commonly cited aspect that had an impact on agency activities since 2015. All agencies that answered the question selected it as having significant or some impact (see Fig. 13). However, the broader European quality assurance framework has also had significant impact, with the next most selected answers being working towards ESG compliance (74%) and Bologna Process policies (59%). The two other answers noted by over half of responding agencies as having significant impact were the maturity of internal quality assurance at institutions (62%) and Covid-19 (58%). It is also worth noting that, in addition to national policies and laws, all responding agencies selected Covid-19 and digitalisation of learning and teaching as having significant or some impact on their activities.



Since 2015, what level of impact have the following aspects had on your agency's external quality assurance activities?

Fig. 13 Aspects that had impact on external quality assurance

In terms of current challenges, it is clear that the fast pace of change in higher education is high on the agenda for quality assurance agencies. It was the most cited currently challenging aspect for agencies (selected by 59% of respondents), followed by ensuring added value after multiple rounds of external quality assurance, ensuring balance between accountability and enhancement, and heavy workload for staff (see Fig. 14). It should also be noted that for 38% of responding agencies ensuring ESG compliance is a challenge. This appears to stem from two separate factors: on the one hand some agencies that answered the survey are actively working towards ESG compliance with the intention of achieving ENQA membership and EQAR listing. On the other hand, for agencies that are already compliant with the ESG and are exploring changes to their methodologies, they consider it important that any changes do not put their ESG compliance at risk. Reflections on other current challenges have been made in earlier sections of this report.



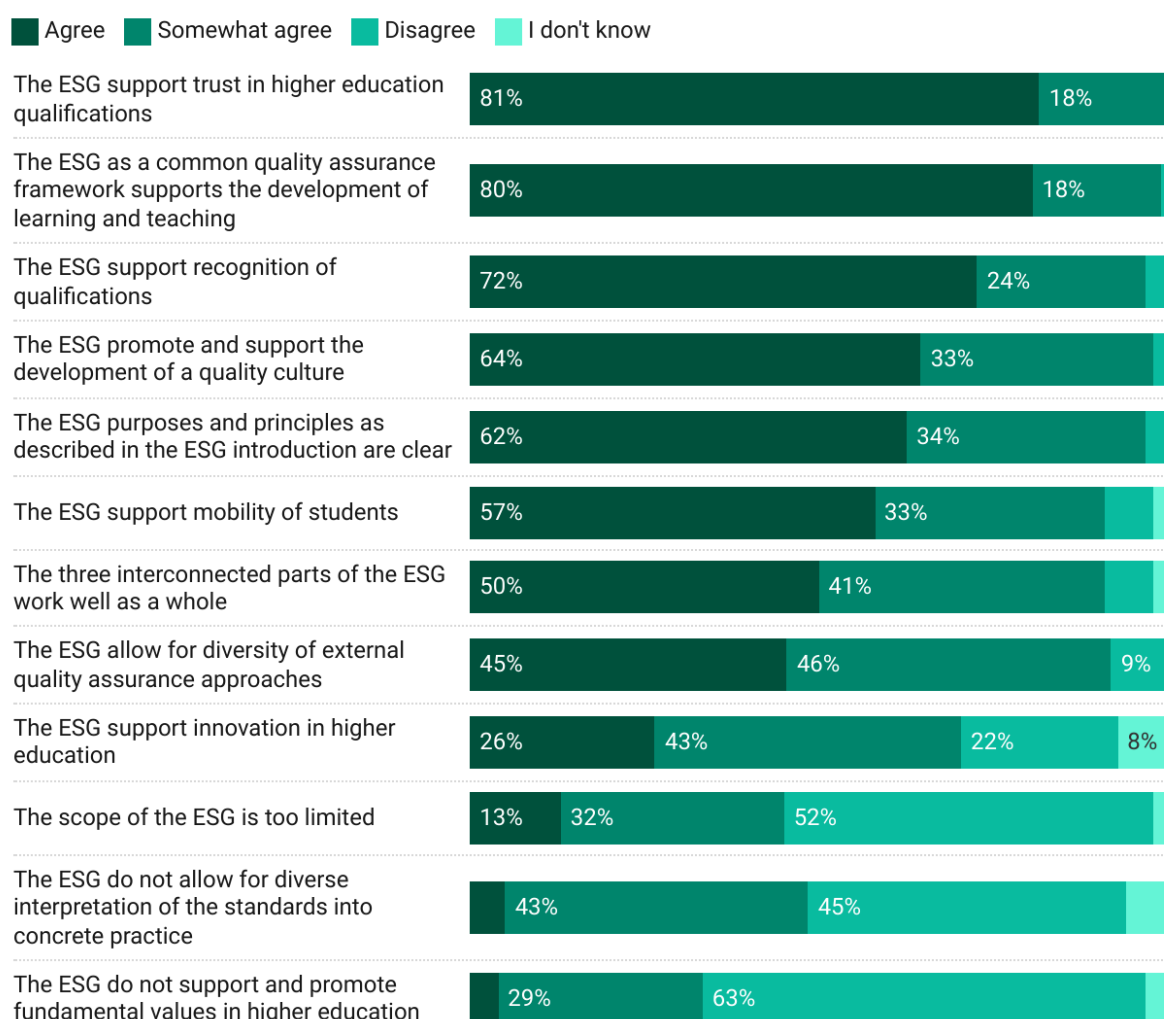
*From the list below please select up to 3-5 most challenging aspects for your agency*

**Fig. 14 Most challenging aspects for quality assurance agencies**

## Future of external quality assurance

Following the mapping of current policies and activities of quality assurance agencies, the question remains: what are their views on the future development of quality assurance within the EHEA? One of several reasons for launching a review of the ESG was the criticism from some agencies that the current framework is inflexible and stifles innovation.

The good news is that the survey responses show an overwhelmingly positive perception of the role of the European quality assurance framework in principle, with particular consensus around the high importance of the ESG in facilitating trust in and recognition of qualifications (see Fig. 15). This also highlights the role of the ESG in supporting other key commitments of the Bologna Process, related to degree structures and recognition.



*Please indicate your agency's level of agreement with the following statements about the ESG?*

**Fig. 15 Perceptions of the ESG**

The success, importance and acceptance of the ESG should therefore not be underestimated and is highlighted by the fact that 91% of respondents believe that the ESG are still needed. The responses also show mixed views regarding the extent to which the ESG limits freedom to explore different approaches to external quality assurance, which has anecdotally been a recent criticism among some agencies. 91% of respondents agreed or somewhat agreed that the ESG allow for diversity of external quality assurance approaches, while almost half (48%) expressed the view that to some extent the ESG do

not allow for diverse interpretation of the standards into concrete practice. The additional comments received explain some of the ambiguity behind these responses. Several comments note that there is a distinction between the ESG on the one hand as a text and framework in itself, and on the other hand its use as a set of criteria against which compliance is assessed (for ENQA membership and EQAR listing). Others also highlight the lingering misconceptions around the difference between standards and guidelines, with compliance required for the former and not the latter. This contributes to a situation where some agencies have found it difficult to explain or introduce an approach that falls outside the common practice but that might still be in line with the principles and standards of the ESG. However, when asked about changes that they would like to implement in their quality assurance approach but cannot, only 8% of respondents cited the ESG as being the primary restriction (see Fig. 8). The most cited reason was national laws (45%), demonstrating that the national frameworks are generally more detailed, and potentially restrictive, than the European framework.

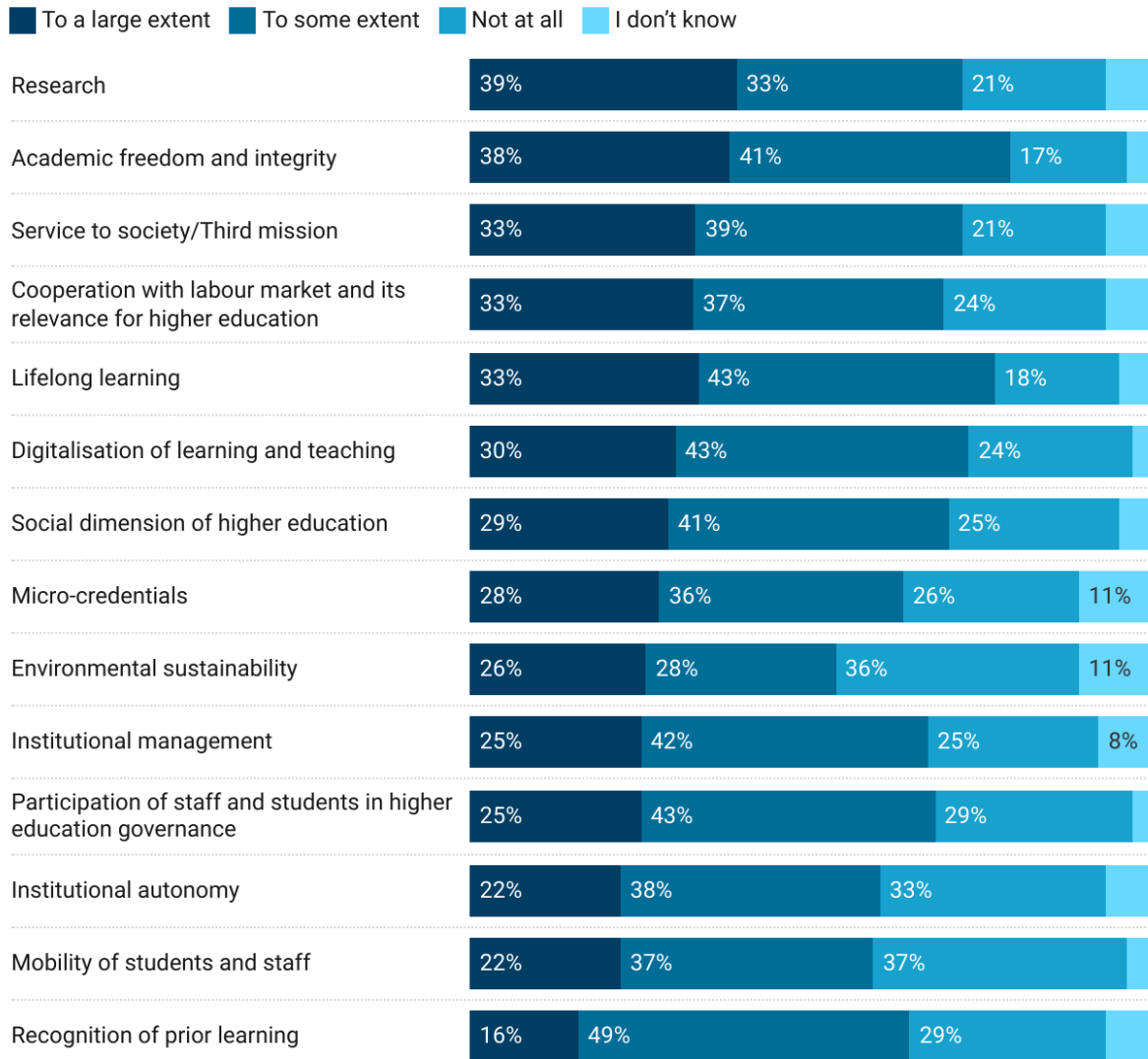
In light of diversity of higher education systems and quality assurance agencies, it is perhaps no surprise that there is no clear consensus about what, if anything, needs to change about the ESG. Indeed, respondents were split almost evenly when asked whether the ESG needed to change: 49% agreed or somewhat agreed that there is no need to change the ESG, while 51% disagreed.

Much of the discussion around changes to the ESG has been linked to the scope of Part 1, which applies to internal quality assurance. Around 80% of respondents indicated that, if this were to be expanded, academic freedom and integrity, lifelong learning, digitalisation of learning and teaching, research, and service to society/third mission should be covered to a large or some extent.

At the other end of the spectrum, the three areas most selected as not needing to be covered were mobility of students and staff (37%), environmental sustainability (36%) and institutional autonomy (33%) (see Fig. 16).

However, the responses to this question are made on the specific premise of an expansion of the ESG. Many of the additional comments to both this question and other questions throughout the survey noted that a revision does not necessarily mean expansion, and concerns were raised by respondents that packing too many issues into the ESG risks diluting its overall purpose. Concerns were also raised by some agencies about the risk of duplicating or contradicting work done by other bodies within their operating context if the scope of the ESG were to be expanded (particularly e.g. for quality assurance of research).

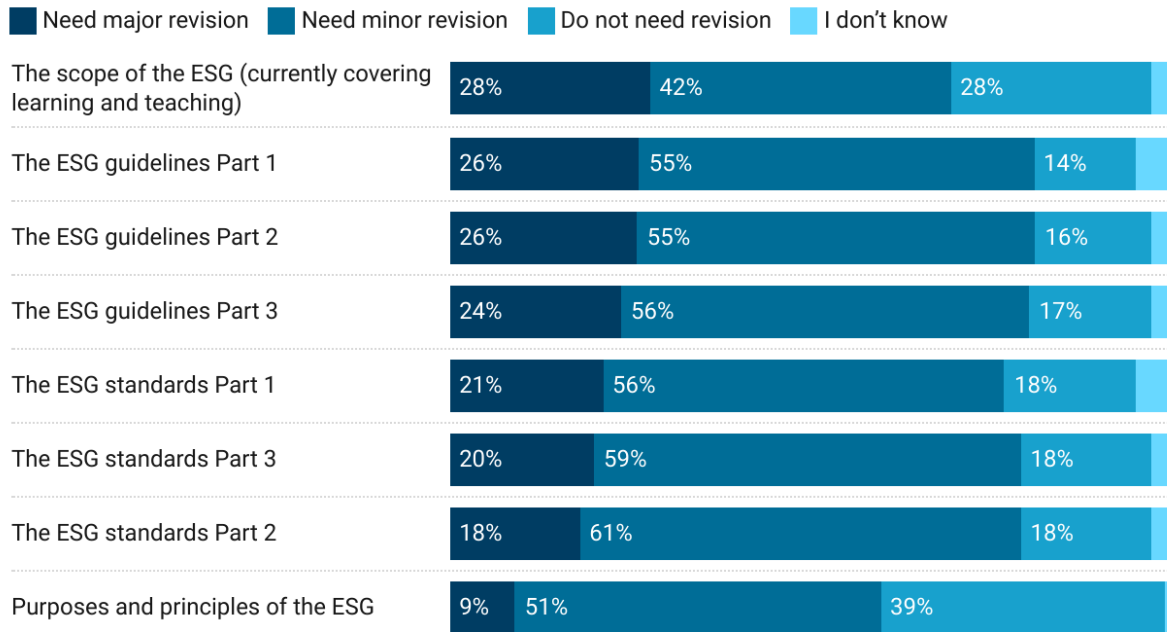




*If the scope of the ESG Part 1 were to be expanded, what should it cover in more detail?*

*Fig. 16 Areas to be covered in more detail by the ESG Part 1*

This evidence, together with many of the comments received, suggest that the criticisms about the ESG may relate in part to its use and application rather than to the actual content. This points to the need for further discussion around the purpose of the ESG, as any revision to the overall approach or inclusion of additional topics outside those directly related to quality assurance of learning and teaching would reflect a change in direction for the fundamentals of the ESG. Interestingly, 39% of respondents stated that the purpose and principles of the ESG do not need revision and only 9% responded that they needed major revision, while 51% gave preference for a minor revision (see Fig. 17). It is often noted that the introduction to the ESG gets neglected, but is just as important as the standards and guidelines as it frames the whole document and puts the rest of it into context.



*Which general aspects of the ESG should undergo changes and to what extent?*

*Fig. 17 Perceptions on the revision of the ESG*

Finally, some of the comments in the survey responses, as well as discussions with stakeholders on the results, have highlighted the need for reflection on which aspects of quality assurance concretely benefit from common standards at EHEA level. While it is clear that higher education needs to pay attention to a wide range of issues, not all of these are best served by creating additional standards for internal and external quality assurance. This may reduce the wide applicability to the diversity of remits of agencies and legal frameworks in which they operate (including across borders), and risk narrowing the options for how certain matters are addressed within national systems. This reflection may help to address the contradiction that many responses speak in favour of expanding the scope of the ESG, while at the same time calling for it to remain simple, flexible and context-sensitive.

## Conclusions

The results of the survey provide a comprehensive picture of external quality assurance activities in the EHEA and confirms the rich diversity of quality assurance agencies that operate under the common framework of the ESG. The value and importance placed on the ESG and its existing principles are clear. However, there is more ambiguity around the perspectives for the future. There is an overall trend of calling for more flexibility, responsiveness and simplicity in external quality assurance, while at the same time wanting the ESG to cover more topics than it currently does. For the authors of the ESG, it will be challenging to chart a course between these two wishes, which, on the face of it seem contradictory. The key is likely to be in the level of detail and level of prescriptiveness of the ESG. There may be ways to (further) highlight the relevance of topics such as fundamental values, social dimension of higher education, links to research, etc. while leaving open the manner in which these are addressed by institutions and agencies. In this regard it will be important to reflect on the synergies and complementarity between the ESG and other tools and frameworks.

Furthermore, further consultation will be needed to ensure that any revision of the ESG and future application of the standards leaves sufficient room for flexibility in designing external quality assurance methodologies. This flexibility would allow agencies to meet the needs of the institutions that they serve while being robust enough to ensure trust in the quality of the education and qualifications that they deliver, so as not to undermine the core purposes of a common framework. In parallel there is a call to national and regional authorities not to set legal frameworks that leave little room for manoeuvre, so that agencies can become quicker to respond to the changing higher education environment.

The next stage of the QA-FIT project will explore some of these issues in more detail, gathering more qualitative input from all key stakeholders in order to further develop the evidence base for a future revision of the ESG.

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The QA-FIT project aims to map the state of play of quality assurance in the EHEA and to critically evaluate the fitness for purpose of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

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



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