Abstract:

This paper provides an overview of the outcomes achieved so far by the Quality Assurance of Cross-Border Higher Education (QACHE) project. QACHE is a project granted by the European Commission to the European Association for Quality Assurance in Higher Education (ENQA) to improve the international practice of quality assuring cross-border higher education (CBHE) and to help developing further the European dimension of quality assurance by looking at CBHE. The project is undertaken in partnership with the Asia-Pacific Quality Network (APQN) and the Arab Network for Quality Assurance in Higher Education (ANQAHE), as well as a number of national quality assurance agencies with different experience with CBHE. These include the UK Quality Assurance Agency for Higher Education (QAA), the German Accreditation Council (GAC), the French High Council for the Evaluation of Research and Higher Education (HCERES), and the National Agency for Quality Assessment and Accreditation of Spain (ANECA) in Europe, and the Tertiary Education Quality and Standards Agency (TEQSA) in Australia.

The paper shows how the QACHE project, while responding to the need of developing a common European quality assurance approach to CBHE, can be seen as a response to the call made in the UNESCO/APQN Toolkit Regulating the Quality of Cross-Border Education for ‘additional national initiatives, strengthened international cooperation, and more transparent information on cross-border education and its quality assurance’ (UNESCO/APQN 2009, p.4) to support the implementation of the UNESCO/OECD Guidelines on Quality Provision in Cross-Border Higher Education. The QACHE project complements the UNESCO/APQN Toolkit’s effort by helping to spell out the Guidelines’ intention to ‘provide guidance to key stakeholders on how to share the responsibility of assuring quality provision of cross-border higher education between the sending country and the receiving country’ (OECD 2005. p.41).

The first section of the paper introduces the project, its aims and planned activities; the following two sections provide an overview of the outcomes achieved in the initial phases. The concluding section points to the direction of travel of the project, now in its final phase, outlining the idea of a toolkit for enhanced international cooperation between quality assurance agencies to help promoting mutual understanding, building reciprocal trust, and ultimately facilitating the quality assurance of higher education provision delivered across national borders.

The QACHE project

QACHE is a project funded by the European Commission, through the Erasmus Mundus programme. Running from 1 October 2013 to 31 December 2015, it is led by ENQA and undertaken in partnership with a project consortium. The consortium includes the national agencies of four European countries with different experience of CBHE – HCERES (France), ANECA (Spain), GAC (Germany) and QAA (UK); the national agency of the main CBHE provider country outside Europe, TEQSA (Australia); and two other regional networks, APQN and ANQAHE, representing the national agencies of the two main receiving regions of CBHE.

1 Paula Ranne and Dr Jagannath Patal commented on and provided input into a draft version of this paper.
2 CBHE is defined in the context of the project as ‘education in which the learners are located in a country different from the one where the awarding institution is based’ (UNESCO/Council of Europe 2001: 1)
3 The focus of the UNESCO/APQN Toolkit was on the UNESCO/OECD Guidelines’ recommendation to national level policy makers to support the development of comprehensive quality assurance and accreditation systems for CBHE.
4 Both UNESCO and OECD issued the jointly developed guidelines. References here are made to the OECD publication.
The project’s main aims are to contribute to the enhancement of the quality assurance of CBHE, internationally, and the development of a more specific European approach to the quality assurance of CBHE. On the basis of preliminary literature review and information gathered informally from various stakeholders, the project consortium identified a number of specific needs which the project is seeking to address as priority areas of action. These interrelated needs, as it is shown later in this paper, have been further confirmed by the activities undertaken so far as part of the project.

One such need is to address the lack of information and policy dialogue on national approaches to the quality assurance of CBHE and thus improve the mutual understanding of the different systems adopted in different countries (European Commission 2008, 2013; ENQA 2008). Another need is to develop shared standards and practices for the quality assurance of CBHE, at both European and international level, to support the consistent implementation of existing international guidelines such as the UNESCO/OECD Guidelines and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESGs) (ENQA 2010; OECD 2012). A further need is to find practical ways in which quality assurance agencies (‘agencies’ henceforth) in sending and receiving countries can cooperate with a view to facilitating the quality assurance of CBHE, avoiding duplication of efforts, and ultimately reducing the regulatory burden on higher education providers operating across borders (ENQA 2008; CHEPS 2012).

The project seeks to address these needs through a series of activities aimed at promoting mutual understanding, building trust, and enhancing cooperation between agencies in key sending and receiving countries of CBHE. While responding to the need of developing a common European quality assurance approach to CBHE, the project can be seen as a response to the call made in the UNESCO/APQN Toolkit for ‘additional national initiatives, strengthened international cooperation, and more transparent information on cross-border education and its quality assurance’ (UNESCO/APQN 2009, p.4) to support the implementation of the UNESCO/OECD Guidelines.

The project’s activities are structured in three phases. The first phase was dedicated to collect information on approaches used to quality assure CBHE by both sending and receiving countries’ agencies, with a particular focus on their views about key challenges and good practice. To this aim the membership of the three regional networks participating in the project (ENQA, APQN, ANQAHE) were surveyed, and the five national agencies (ANECA, GAC, HCRHES, QAA, TEQSA) produced detailed country reports. A survey was also sent to a sample of higher education providers in the four CBHE provider countries represented in the project: France, Germany, Spain and the UK. The second phase was dedicated to discuss the outcomes of the surveys and the country reports, and to inform the third phase of the project. Discussion took place in the context of three regional forums organised in Europe, the Gulf and East Asia with key experts and stakeholders in the region. The third phase, currently in progress, is dedicated to developing the deliverables of the project. These consist in: 1) a toolkit providing practical guidance to agencies, focusing on concrete ways in which inter-agency cooperation in the quality assurance of CBHE can be enhanced; and 2) general principles for the quality assurance of CBHE, with a focus on European agencies.

The following two sections of the paper provide a brief overview of the main outcomes of the first two phases of the project, looking at the direction of travel these have imparted to the development of the toolkit. The paper concludes outlining the practical guidelines that, on the basis of the discussion had at the expert forums, the project partners are currently considering for inclusion in the toolkit. It is yet too early to be able to report on progress related to the second more general deliverable of the QACHE project, the identification of general principles for the quality assurance of European CBHE.

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5 In the paper reference will be made to ‘quality assurance’ in a very broad sense, to include a variety of regulatory activities in which agencies may be involved, including institutional approval and programme accreditation.
Phase 1: findings from regional surveys and country reports

Regional networks surveys

During spring and summer 2014, the member agencies of ENQA, APQN, and ANQAHE were sent a survey to find out about national approaches to CBHE, and views about challenges and ways to facilitate the quality assurance of CBHE from both a sending and receiving country perspective (Al Sindi 2014; Llavori 2014; Patil 2014). In total, the three regional networks administered their surveys to over 100 national agencies obtaining an average of 70 percent response rate. Despite the great diversity of national higher education and regulatory systems, different stages of development and different degrees and ways of involvement with CBHE, the surveys’ responses revealed clear common patterns amongst the three regions and widespread agreement on key challenges and ways to move forward to address them.

CBHE is clearly a widespread and expanding phenomenon in all three regions. Of the 30 agencies responding to the ENQA survey 80 per cent stated that their national higher education providers are currently involved in some form of CBHE overseas; and similarly 80 per cent of the approximately 30 APQN respondents and 65 per cent of the 10 ANQAHE respondents indicated that their countries have different forms of in-bound CBHE. However from the surveys it is apparent that both regulation of CBHE (in-bound or out-bound) and detailed information about CBHE is rather patchy and often lacking across the three regions.

In Europe only a minority of agencies (20 per cent) have a specific quality assurance system for out-bound CBHE (with the exception of joint/double degrees, a primarily European mode of cooperation developed in the context of the Bologna Process, for which 88 per cent of agencies have systems in place.) This situation is reflected in the Gulf region where 86 per cent of respondents said not to have any specific quality assurance system in place for in-bound CBHE. In the Asia-Pacific region the majority of respondents (57 per cent) indicated to have a regulatory framework for the quality assurance of in-bound CBHE, however this still leaves out a significant 32 per cent of respondents without a system in place to oversee the quality of in-bound CBHE.

This general lack of regulation was not considered satisfactory by responding agencies, which widely agreed on the need to develop national regulatory frameworks for in-bound or out-bound CBHE. APQN agencies stressed the need to support the consistent implementation of the UNESCO/OECD Guidelines, which was already affirmed by the UNESCO/APQN Toolkit; while the vast majority of ENQA member agencies (75 per cent) responded to be in favour of developing European wide standards and guidelines to support the implementation of the ESGs to CBHE under ENQA supervision. ANQAHE agencies pointed also to the need to address the fragmentation of national higher education legislation, and to meet the capacity development needs of relatively young agencies, also highlighted by APQN member agencies.

A commonly perceived obstacle to the development of regulatory frameworks for CBHE (out-bound or in-bound) is the lack of detailed information about CBHE. There was a difference in emphasis in this regard between agencies in the sending countries of Europe and agencies in the receiving countries of the Gulf and Asian-Pacific regions. The lack of information lamented by ENQA respondents was primarily about the extent and nature of out-bound provision, with 75 per cent reporting that there is no comprehensive and up-to-date register or list of outbound CBHE in their country. APQN and ANQAHE respondents were instead unanimous in calling for more information on overseas providers operating in their jurisdiction, such as their status with the home countries agencies, and how they are quality assured by them. However sending countries agencies also pointed out the need to better understand the regulatory frameworks of receiving countries; and receiving countries agencies pointed to the need to provide better information to students and other stakeholders about the foreign provision offered in their jurisdiction.
All surveyed agencies in the three regions saw strengthening cooperation as the best way to enhance the quality assurance of CBHE, by promoting mutual understanding of the respective approaches to CBHE in their countries, and the sharing of good practice. In particular, agencies pointed out how enhancing current information sharing about national approaches to CBHE is key to addressing current regulatory gaps, conflicts, or duplication, and improve the recognition of qualifications obtained through CBHE programmes, two of the main obstacles identified by the agencies surveyed. Absence of coordination between the systems of sending and receiving countries’ agencies was indeed reported as the main challenge to the quality assurance of CBHE across the three regions. In this context regional networks such as ENQA, APQN and ANQAHE were seen as potentially playing an important role in promoting policy dialogue and cooperation between their constituent agencies, and thus supporting the implementation of the UNESCO/OECD Guidelines.

**European providers’ survey**

A survey was also addressed to providers in the four European countries represented in the project: France, Germany, Spain and the UK (Kelo 2014; Ranne 2014). A sample was selected with the support of the European project partner agencies, and, in proportion to the number of providers engaged in CBHE in each country. The survey was sent to a total of 47 providers and 21 responses were recorded.6

The survey of providers confirmed the main findings from the surveys of agencies. Regulation of CBHE (in-bound or out-bound) and information about CBHE is found by most respondents to be patchy and often lacking. CBHE does not seem to be a well-known phenomenon by providers in most of the surveyed countries. In particular most respondents have expressed a lack of familiarity with the terminology used to refer to CBHE, and were not able to put their own CBHE initiatives into a broader national or international context. In most cases, providers seemed to be unable or not used to analyse CBHE provision into its different types and models, and national and international strategies, policies, and guidelines were not well known.

Respondents pointed to the role to be played by agencies in addressing this information deficit. Most respondents expressed a clear view that they would appreciate more dissemination of information and guidance by their national agency about both the regulatory frameworks of different CBHE host countries and best practices in quality assuring CBHE. Providers also agreed that national agencies should strengthen cooperation with their counterpart agencies in host countries so as to facilitate the quality assurance of CBHE and the recognition for CBHE qualifications. In particular agencies were recommended to better share information about their respective higher education and quality assurance systems, benchmark each other requirements and procedures, and adopt more flexible approaches to the quality assurance of CBHE to suit different types of CBHE provision (such as branch campuses and joint programmes).

**National country reports**

The findings from the surveys were substantially confirmed by the country reports produced by the five national agencies, ANECA, GAC, HCERES, TEQSA and QAA (Duclos 2014; Mayer-Lantermann 2014; Pisarz 2014; Trifiro 2014.) The reports highlighted the absence of a common approach to CBHE and its quality assurance in Europe, and the absence of well developed and tested systems for the quality assurance of out-bound CBHE, with the exception of the UK and Australia.7 All agencies identified the absence of comprehensive information about out-bound CBHE as a challenge, although this was more important in some countries, such as France and Spain, than in others. Lack of

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6 Although the response rate can be considered satisfactory, it should be noted that most of the responses were completed by less than a half of the respondents.

7 For instance, the 2013 European Commission’s report Delivering Education across Borders in the European Union, while noting that there is ‘on the whole, very little regulation by Member States of their higher education institutions’ activities beyond their own borders’, pointed out that ‘the UK’s QAA approach to auditing the exports of UK providers is a good practice (European Commission 2013, p.15).
reciprocal understanding or knowledge by sending and receiving countries’ agencies of the regulatory frameworks in place in the respective jurisdictions was similarly identified as a key obstacle, especially by those agencies with most experience in quality assuring CBHE, such as QAA and TEQSA.

All country reports stressed the importance and need for strengthening cooperation between sending and receiving countries as way to enhance mutual understanding, build mutual trust, and ultimately facilitate the quality assurance of CBHE avoiding duplication of efforts and reducing the regulatory burden on providers. In this context, the reports placed particular emphasis on the need to facilitate the mutual recognition of quality assurance processes and decisions. This was perceived by the European agencies to be less of an issue within Europe, where the presence of a common set of standards in the form of the ESGs helps in creating trust about the compatibility and comparability of quality assurance processes and outcomes. Again, there is variability in the extent and ways in which the reporting agencies liaise with host countries counter-part agencies, the QAA providing for instance examples of good practice of inter-agency cooperation in the quality assurance of CBHE. However all agencies agreed that strengthened cooperation and increased reliance on each other quality assurance oversight should be the way forward to deal with the challenges posed by the expansion of provision across borders, and in particular the associated resource challenges.

**Phase 2: outcomes of regional expert forums**

Three regional expert forums have been organised to discuss the outcomes from the surveys and to inform the next phase of the project. A European forum took place in London, hosted by the QAA (5/6 November 2014), followed by a Gulf regional forum hosted in Bahrain by ANHQAE (20/21 November 2014), and by an East-Asian forum held in Macau and hosted by APQN (23/24 January 2015). The three regional forums in themselves helped addressing the information needs highlighted by the regional surveys and country reports by facilitating policy dialogues amongst agencies in sending and receiving countries, involving other key stakeholders as well, such as sector bodies and higher education providers. The forums have been pivotal in shaping the final phase of the project, directing the development of the planned toolkit in a direction that could helpfully improve the practice of quality assuring CBHE.

The challenge facing the development of such a toolkit was to build on the international guidelines and documents already out there, such as the UNESCO/OECD Guidelines, the UNESCO/APQN Toolkit, and the ESGs, as well as the existing national reference points\(^8\), in a way which would help progressing international practice without duplicating existing work. The discussions held in London, Bahrain and Macau pointed to a clear direction of travel for a toolkit capable to bring a new contribution to the field: this is to develop guidance to help agencies in sending and receiving countries building mutual trust about the quality of CBHE and its quality assurance. The discussions held at the forums brought in fact to the fore what can be referred to as a ‘trust gap’ between sending and receiving countries about the quality and comparability of CBHE provision. A gap perhaps most clearly manifested by the different approach to the recognition of CBHE qualifications adopted by sending and receiving countries. Sending countries would normally recognise the qualifications obtained by studying on programmes delivered overseas as being equivalent to those obtained by studying on programmes delivered at a provider’s home campus, for all purposes, pursuing further studies and employment in private and public sectors (with the exception of some regulated professions.) This is not always the case in CBHE host countries, especially for certain types of CBHE provision, such as distance-learning and collaborative partnership with local private institutions. Providing practical guidance on how sending and receiving countries’ agencies can

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\(^8\) See for example: the QAA’s UK Quality Code: Chapter B10: managing higher education provision with others (QAA 2012); the Australian Higher Education Standards Framework (Threshold Standards), overseen by TEQSA (Australian Government 2013), and the GAC’s Rules for the Accreditation of Study Programmes and for System Accreditation (GAC 2013).
address this ‘trust gap’ was seen by the participants in the forums and by the project consortium as a useful, timely and new contribution.

**Phase 3: a toolkit for cross-border cooperation**

The QACHE toolkit aims to complement the UNESCO/APQN Toolkit’s effort to support the implementation of the UNESCO/OECD Guidelines with a specific focus on providing practical guidance on how sending and receiving country agencies could ‘share the responsibility of assuring quality provision of cross-border higher education’ (OECD 2005, p.41).

The toolkit is being conceived as a brief document offering general principles supported by explanatory text setting out their rationale, and examples of how they could be implemented in practice. The toolkit, respecting the autonomy of different national systems, does not wish to make recommendations on which regulatory approach to adopt or how to quality assure CBHE, but aims to offer guidance on how agencies can realise that mutual understanding, trust and cooperation required to ‘facilitate the process of assuring the quality of programmes delivered across borders and institutions operating across borders while respecting the quality assurance and accreditation systems of the receiving countries’ (OECD 2005 p.17.). This conclusive section, drawing on the discussion held in the context of the regional forums, and the findings from the surveys and country reports, outlines the guiding principles that are being considered for inclusion in the toolkit.

A first step to promote and facilitate reciprocal understanding should be for agencies to have easily accessible clear and explicit policies outlining their approach to CBHE. This will help agencies articulating the way they deal with CBHE and start addressing the information needs of agencies from both receiving and sending country. However, the information needs of these agencies typically extend beyond obtaining a clear and comprehensive account of the regulatory framework within which the CBHE providers they are overseeing operate, whether in the sending country or in the country hosting their provision. Agencies would also benefit from regularly keeping themselves abreast of regulatory developments in sending or receiving countries of CBHE provision under their oversight, and from being able to receive information about particular CBHE providers, such outcomes of quality assurance reviews. This extent of information sharing requires more regular and pro-active engagement between agencies than simply making their policies and approaches publicly available. As a further step, agencies should therefore seek to establish regular channels of communication between themselves to share developments in their national higher education and quality assurance systems, information about providers operating in both jurisdictions, and getting to understand and map their respective approaches to quality assurance, including of CBHE. Establishing formal Memoranda of Understanding is generally seen as an effective way to facilitate regular communication and information and intelligence sharing, and thus start building trust and strengthening relations.

These first two steps are about getting to know each other, and cooperate through information sharing. To take cooperation further, with a specific focus on the quality assurance of CBHE, agencies should consider liaising with their counterpart agencies, in either the sending or receiving country or countries, whenever they are about to look at specific instances of CBHE provision. For instance, before looking at a provider’s CBHE provision a sending country agency should liaise with the relevant receiving country agency, or vice versa, to notify them of their planned review activity, and check whether the provider in question and its provision have already been subject to recent oversight, or it is planned to undergo oversight by the other agency. In this way sending and receiving countries’ agencies will be able to use each other information and reports to inform their planned CBHE review activity, and eventually coordinate any forthcoming oversight activity, for example with regard to scheduling of reviews, or even considering undertaking forms of joint-review.

Discussions held at the regional expert forums showed wide agreement on the principle that agencies of sending and receiving countries should seek to explore ways to undertake joint reviews of CBHE. The toolkit, in the respect of agencies’ autonomy, cannot recommend specific ways in which they should cooperate in the review of CBHE. Considering the different approaches adopted to the quality
assurance of in-bound or out-bound CBHE, and that each agency have different degrees of autonomy to modify and adapt their approach and processes, many having to resort to government’s endorsement or consultation with the sector for example, the particular way in which receiving and sending countries’ agencies may decide to cooperate in joint reviews activity will need to be established by the cooperating agencies on a case by case basis. However the toolkit can provide concrete examples of how agencies have already cooperated in practice in undertaking review of CBHE.

Finally, a key role in addressing the information and cooperation needs of agencies outlined above should also be played by regional networks. Networks such as ENQA, APQN, and ANQAHE are ideally placed to function as central repositories of information on national higher education systems, quality assurance approaches and higher education providers, and as facilitators of international policy dialogue and the cooperation between agencies, such as through projects just like QACHE. Regional networks can indeed play an important role in supporting and monitoring the implementation of the above principles, and other existing international guidelines.

Conclusions

The regional networks’ surveys, the survey of European providers and the national country reports undertaken as part of the QACHE project have highlighted the need to enhance the national and international oversight of CBHE, currently very patchy, and to address the lack of information about CBHE and different national regulatory approaches to CBHE. Strengthening cooperation between agencies, especially from sending and receiving countries, has unanimously been seen as the way forward to facilitate and enhance information exchange, policy dialogue and the regulation of CBHE.

The discussions held at the three regional forums have not only helped in bringing these findings to the fore, but also to inform the development of one of the deliverables of the project, the planned toolkit to facilitate the quality assurance of CBHE. Focusing the toolkit on providing practical guidance on how agencies can engage in different types of cooperation is a way to build on previously developed documents, such as the UNESCO/OECD Guidelines and the UNESCO/APQN Toolkit, while contributing in an innovative way to the development and improvement of the practice of quality assuring CBHE.

The principles emerging from the discussions held at the regional experts’ forums, and between the members of the project consortium, can be seen as pointing to different, although interdependent, stages of cooperation. The first principle is about making information about national approaches to CBHE easily accessible. The second principle is about pro-actively engaging in information sharing activities with counter-part agencies sharing CBHE provision. The third principle is about seeking to liaise with them whenever intending to quality assure CBHE provision. The fourth principle is about seeking ways in which to cooperate in the actual quality assurance of CBHE provision. The fifth principle is directed to regional networks of agencies, calling for them to play an enhanced role in the facilitation of information sharing and inter-agency cooperation.

The project consortium and participants in the forums shared the view that CBHE does not only pose challenges, but also create great opportunities for our societies, in particular for widening access to higher education, addressing skills gaps, and furthering global citizenship. They agreed that what brought them together is to explore ways in which it is possible to work together to fully harness the opportunities posed by CBHE while avoiding its possible challenges and shortcomings, and in particular sub-standard education provision. The shared goal of all those who have contributed to the QACHE project is to facilitate the provision of quality CBHE, avoiding as much as possible regulatory gaps, and unnecessary discrepancies and duplication, in the ultimate interest of higher education providers and students.
References:


European Commission 2008: http://www.aca-secretariat.be/?id=188


