

# EQAR Self-Evaluation Report

March 2011

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## 1. Introduction

This is the self-evaluation report submitted to the panel of experts conducting the external evaluation of the European Quality Assurance Register for Higher Education (EQAR).

The present chapter introduces the objectives of the evaluation and the evaluation process. Chapter 2 summarises the historical background and the context in which EQAR works.

Chapters 3, 4 and 5 constitute the main body of the report. Each chapter contains (1) a summary of EQAR's mission, (2) a description of structures and work done, (3) a self-analysis based on internal reflections and the feedback from stakeholders and (4) a conclusion with proposals for action.

### 1.1 Objectives of the Evaluation

The Terms of Reference for the external evaluation (Annex I) specify that the evaluation should analyse the performance of EQAR in fulfilling its mission and objectives within the framework established by the European<sup>1</sup> Standards and Guidelines for Quality Assurance (ESG), the Communiqué of the Bologna Follow-up Conference of Ministers responsible for Higher Education in London 2007, and the Report on a Register of Quality Assurance Agencies, submitted to ministers by the E4 Group<sup>2</sup>:

"[The] external evaluation is expected to address three main questions:

- a. Are the organisational structures and methods of EQAR fit for purpose in the light of the agreed objectives? Have they functioned effectively and efficiently in practice?
- b. What has been the initial impact of EQAR? Is it in line with the desired goals?
- c. What improvements are desirable? How might the organisation develop and act further with a view to best achieving its mission and objectives?

Thus, the ministerial decision to establish a register of quality assurance agencies as an independent, stakeholder-driven organisation and based on the European Standards and Guidelines (ESG), as well as the ESG themselves are not subject to the evaluation."

### 1.2 Coordination of the Evaluation

When mandating the E4 Group to establish EQAR, European ministers asked the E4 organisations "to ensure that after two years of operation, the register is

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<sup>1</sup> Throughout the report, unless specifically indicated otherwise, the term "European" refers to the (currently 47) countries participating in the Bologna Process, see <http://www.ehea.info/members.aspx>, i.e. all Member States of the Council of Europe, except Belarus, but including Kazakhstan.

<sup>2</sup> Comprised of the European Association for Quality Assurance in Higher Education (ENQA), the European Students' Union (ESU), the European University Association (EUA) and the European Association of Institutions in Higher Education (EURASHE).

evaluated externally, taking account of the views of all stakeholders” (London Communiqué 2007).

Consistent with the principles generally accepted for external reviews of quality assurance agencies, the E4 Group considered it most appropriate that EQAR itself would identify a suitable independent coordinator for the evaluation, which, in turn, would appoint the evaluation panel.

The external evaluation was discussed by EQAR members at the General Assemblies of 29 September 2009 (Stockholm) and 19 February 2010 (Madrid). At the latter meeting, members endorsed the proposal that the evaluation be coordinated by a Steering Group working under the auspices and with the support of the Council for Higher Education Accreditation (CHEA).

CHEA accepted the invitation. The EQAR General Assembly agreed that the Steering Group should consist of the President of CHEA, Judith Eaton, as its chair as well as a European quality assurance expert, a higher education policy expert with a European governmental background and a higher education policy expert with a European stakeholder background.

EQAR members were invited to suggest suitable individuals to serve on the Steering Group. The EQAR Executive Board considered the proposals received in relation to the desired profiles and aimed to assure a geographical balance of the Steering Group members. It appointed Jan Levy, Norman Sharp and Martina Vukasović to the Steering Group.

The Terms of Reference (Annex I) were developed by EQAR and the Steering Group on the basis of the initial plans endorsed by the General Assembly.

Following some iterations between EQAR and the Steering Group, the draft was submitted to EQAR members for consultation. The EQAR Executive Board considered the comments received and formally agreed the final Terms of Reference with the Steering Group.

### 1.3 Self-Evaluation Process

In June 2010, members of the Executive Board, the Register Committee and the Appeals Committee gathered for a first Joint Informal Meeting of EQAR committees. The Joint Informal Meeting was the first opportunity for members of the different committees to reflect on EQAR’s activities and exchange their views in an informal setting, outside the committees’ regular official, decision-making meetings. The Joint Informal Meeting served as a kick-off event for the self-evaluation process.

The Self-Evaluation Group (SEG), including members of the EQAR Executive Board, Register Committee and Secretariat, coordinated the self-evaluation process. The composition of the SEG is available in Annex II.

The SEG drafted an outline for the Self-Evaluation Report and submitted the outline for comment to all members of EQAR’s committees.

Based on the proposed outline and incorporating the feedback received from governments and stakeholders (see following section), the SEG prepared a first draft Self-Evaluation Report and consulted all committee members on the draft by email. A second draft was submitted for consultation by committee members on 18 February 2011.

The SEG presented the final draft report to the EQAR General Assembly for comments and reflections. Following the General Assembly of 18 March 2011 the SEG finalised the report with a view to the feedback from the members.

#### 1.4 Data Sources

Many of the reflections, analyses and proposals for future action set out in this report result from the discussions at the above mentioned first Joint Informal Meeting and within the Self-Evaluation Group (SEG). The SEG drew upon the feedback regularly elicited from applicants and on internal reflections of the Register Committee and Executive Board on their work.

The self-evaluation process was further informed by a number of interviews and surveys conducted particularly for that purpose. EQAR commissioned an external expert, Cornelia Racké, to interview a sample of European governments (EQAR members as well as non-members) and stakeholder organisations represented in the Bologna Follow-Up Group (see Annex XIII). The interviews were conducted according to the three main questions agreed for the external evaluation.

Feedback from quality assurance agencies was gathered in a specific survey. Agencies were given the option to reply anonymously. 46 quality assurance agencies took part in the survey (see Annex XV for the results).

A short, general survey of website visitors was conducted in the period from 11 October to 30 November 2010. 70 visitors took part in the survey, of 5 271 unique visitors within this period. The low response rate might be explained by a high number of visits being by internals (Committee members etc.) or by search engines. The latter usually represent about 50% of the total website visits.

In addition, EQAR invited all interested parties to submit more elaborate written comments in response to the three main questions for the evaluation. The Public Call for Comment was announced on 6 October 2010, the deadline for comments was 30 November 2010. One response was submitted by the Ministry of Education, Culture and Science of the Netherlands.

## 2. Background

### 2.1 Historical Brief: From Bergen to London and Sarajevo

At their conference in Bergen (2005), Bologna Process ministers adopted the European Standards and Guidelines for Quality Assurance (ESG) based on a proposal prepared by ENQA in cooperation with ESU (then ESIB), EUA and EURASHE, working together as the “E4 Group”.

Next to standards and guidelines for internal quality assurance (ESG part 1), external quality assurance (part 2) and external quality assurance agencies (part 3), the 2005 report already contained a proposal to establish a register of quality assurance agencies, which would, inter alia, provide information on agencies’ level of compliance with the ESG.

While adopting the standards and guidelines, ministers welcomed “the principle of” a register of agencies and asked the E4 Group to develop the idea further until the next ministerial conference.

A joint Recommendation of the European Parliament and of the Council of the European Union<sup>3</sup>, adopted in 2006, supported the proposal of a European register of agencies.

Between 2005 and 2007, the E4 Group deliberated further on its proposal to establish a register of quality assurance agencies, with a view to presenting an operational model to ministers. The E4 Group considered various options and concluded that an “exclusive register”, i.e. a register listing only those agencies that comply substantially with the ESG, was the most transparent and clear solution.

The E4 Group Report set out the following objectives:

- “ – promote student mobility by providing a basis for the increase of trust among higher education institutions
- reduce opportunities for dubious organisations or ‘accreditation mills’ to gain credibility
- provide a basis for national authorities to authorise higher education institutions to choose any agency from the Register, if that is compatible with national arrangements
- provide a means for higher education institutions to choose between different agencies, if that is compatible with national arrangements
- serve as an instrument to improve the quality of quality assurance agencies and to promote mutual trust amongst them.”

At their London Summit (2007) ministers took note of the E4 Group’s Report on a Register of Quality Assurance Agencies and welcomed “the establishment of a register by the E4 group, working in partnership, based on their proposed operational model”. Ministers set out that:

“The purpose of the register is to allow all stakeholders and the general public open access to objective information about trustworthy quality assurance

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<sup>3</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:064:0060:0062:EN:PDF>

agencies that are working in line with the ESG. It will therefore enhance confidence in higher education in the EHEA and beyond, and facilitate the mutual recognition of quality assurance and accreditation decisions.”

Having further developed their operational model, on 4 March 2008 the E4 Group founded EQAR as an International Non-Profit Association under Belgian law. The Statutes of EQAR set out that:

“[EQAR] pursues the objective of furthering the development of the European Higher Education Area by enhancing confidence in higher education and by facilitating the mutual recognition of quality assurance decisions. [...] In order to achieve its objectives, [EQAR] establishes and manages a list of quality assurance agencies [...] that operate in substantial compliance with the [European] Standards and Guidelines for Quality Assurance [...]”

EQAR’s objectives have been further specified in its Mission Statement, adopted by the first General Assembly (June 2008, Sarajevo, see Annex V).

## 2.2 Context: EQAR and the Bologna Process

Quality assurance has always been one of the main action lines in the Bologna Process. The E4 organisations as well as the Bologna countries have been closely involved in the setting up and the functioning of quality assurance systems in all their aspects and at different levels.

EQAR is one of several organisations and networks exclusively concerned with external quality assurance of higher education at European level, such as ENQA, the membership-based, representative body of quality assurance agencies at European level and the European Consortium for Accreditation (ECA), a group of quality assurance agencies having accreditation as their main methodology.

These all have their own, unique missions. EQAR’s unique function is to manage the Register and thus provide reliable information on quality assurance agencies that comply substantially with the ESG. It is an independent organisation not dominated by the interests of one particular stakeholder group, but co-governed by stakeholders and governments.

The Bologna Process is a process of voluntary collaboration of governments in the field of higher education, in consultation with stakeholders, rather than a formal intergovernmental process. While governments make firm commitments in the Bologna Process, these are not legal instruments.

The European Union should, according to the Treaty of Maastricht, encourage cooperation between its Member States and support and supplement their action, “while fully respecting the responsibility of the Member States for the content of teaching and the organization of education systems”. Thus, in addition to programmes such as ERASMUS for student exchange, the European Union bodies focus on developing (non-binding) recommendations, calling for action at national level.

As a consequence of this framework, being registered on and using EQAR is voluntary. There is no (formal) obligation for any quality assurance agency to apply for registration, unless by national legislation. There is no (formal) obligation for Bologna Process countries to recognise quality assurance results and decisions of registered agencies in one way or another, unless national authorities make specific decisions in this respect.

At the same time, EQAR is the first legally established organisation that has directly emerged from the Bologna Process. Unlike the Bologna Follow-Up Group (BFUG) and Secretariat, which are not separate legal entities in their own right but are working under the auspices of different participating countries on a rotating basis, EQAR is the first Bologna structure that has been formally institutionalised as an independent and permanent organisation.

Given this context, EQAR’s remit is limited to managing a register of quality assurance agencies that comply substantially with the ESG and promoting this register and its use by governments, agencies, higher education institutions, employers and students.

The basis for achieving the wider goals of EQAR, e.g. promoting mobility, however, lies in measures such as the mutual acceptance of quality assurance results. EQAR can support such measures through its work, while these measures themselves are not within EQAR’s power. Figure 1 illustrates how the existence of a Register supports the wider goals and objectives formulated when EQAR was established, and which measures may be facilitated by the Register even though they are not within EQAR’s power.

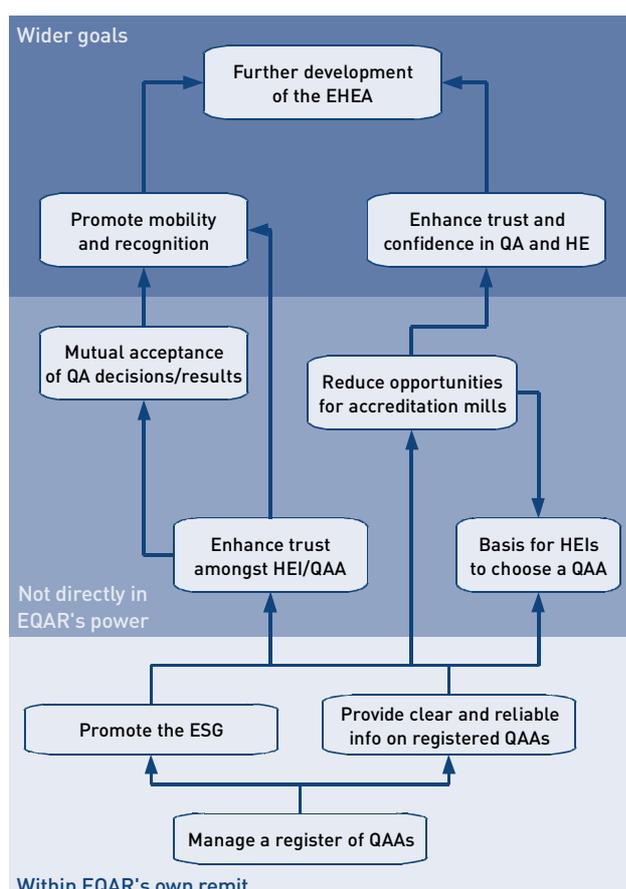


Figure 1: The Register and other measures, goals and objectives

### 3. Organisational Structure

#### 3.1 Mission

In the E4 Group report endorsed by the London Ministerial Summit, the E4 organisations expressed the belief “that a partnership arrangement [for the Register] involving all interested stakeholders is most likely to be successful”. The organisational structure of EQAR was developed with the aim to reflect the E4 Group’s responsibility for managing the register, entrusted by ministers to the E4 Group, on the one hand, and the need for overall accountability to and oversight by governments, on the other hand.

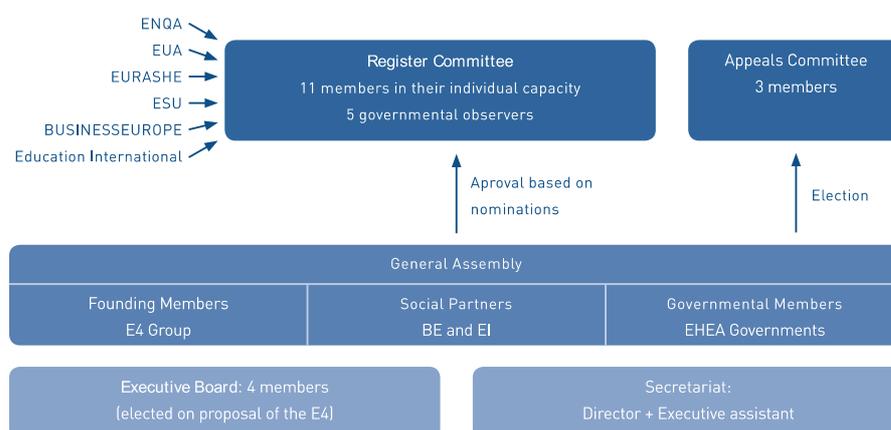
The Mission Statement (adopted by the 1<sup>st</sup> EQAR General Assembly in 2008) sets out some key values for the organisational structures:

**EQAR acts independently from other organisations [...].**

**EQAR will make transparent its mode of operation and its procedures while ensuring necessary confidentiality. EQAR is committed to continuously improving the quality of its work.**

#### 3.2 Description

Building on these premises a structure had to be found that enables independent decision-making by the Register Committee on inclusion of quality assurance agencies on the Register, within an organisation established and managed by the E4 organisations. As a result, a structure of bodies with distinct roles and responsibilities, and checks and balances between them, has been created (Figure 2).



**Figure 2: Organisational structure of EQAR**

EQAR is organised as an International Non-Profit Association<sup>4</sup> under Belgian law. The association’s members are the four Founding Members (ENQA, ESU, EUA and EURASHE), two Social Partner Members (BUSINESSEUROPE and Education International) as well as currently 26 European countries who are

<sup>4</sup> French: *Association Internationale Sans But Lucratif – AISBL*, Dutch: *Internationale Vereniging Zonder Winstoogmerk – IVZW*

Governmental Members<sup>5</sup>. Quality assurance agencies included on the Register do *not* have a status of association member or equivalent.

The composition and functioning of the statutory bodies is explained in the following. Their composition is available in Annex VII.

#### **a) General Assembly**

The General Assembly (GA), comprised of all members, is the supreme decision-making body of EQAR.

The General Assembly decides on the budget, approves the accounts, elects the Executive Board and Appeals Committee, approves the Register Committee, and discusses any matters of major importance for the Association as a whole.

The General Assembly convenes at least once a year. The European Commission, the Bologna Secretariat, the Council of Europe and UNESCO-CEPES participate in its meetings as observers.

The voting system of the General Assembly ensures that most decisions require a majority of both the Governmental Members and the Non-Governmental Members (i.e., Founding and Social Partner Members).

#### **b) Executive Board**

The Executive Board (EB) is in charge of the management of EQAR as an association, including administrative and financial matters and strategic coordination.

The Executive Board comprises five members: one from each Founding Member and the Chair of the Register Committee as an *ex officio* member without voting rights.

The Executive Board is elected by the General Assembly for a two-year mandate. The functions of President, two Vice-Presidents and Treasurer rotate annually amongst the Board's voting members. The Board convenes about four times annually.

#### **c) Register Committee**

The Register Committee has the exclusive responsibility to decide on applications for inclusion on the Register. It exercises this responsibility independently; its decisions do not require approval or ratification by another body. It produces a yearly report to the GA in order to make its work transparent (see also 3.3d).

The Register Committee comprises eleven members. Ten individuals with expertise in quality assurance are nominated by the European stakeholder organisations representing quality assurance agencies (ENQA), students (ESU), universities (EUA) and other higher education institutions (EURASHE, 2 nominees each) as well as the European representative bodies of businesses (BUSINESSEUROPE) and academic staff (Education International, 1 nominee each). The chair is elected by the nominated members and co-opted onto the

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<sup>5</sup> All parties to the Council of Europe's European Cultural Convention (<http://conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=018&CL=ENG>) are eligible for Governmental Membership. This includes the 47 countries forming the European Higher Education Area (EHEA).

Register Committee as its eleventh member. Five governments are nominated by the Bologna Follow-Up Group (BFUG) as observers on the Register Committee.

The General Assembly approves the Register Committee as a whole for a two-year mandate. It can only refuse the block nomination and not single nominations. This safeguards the diversity of stakeholder perspectives on the Register Committee and the right of the organisation to nominate autonomously experts with their stakeholder perspective.

The Register Committee members are nominated as experts acting in their individual capacity, and not as representatives of the nominating organisations. That is, they are expected to contribute from the perspective of their stakeholder *background* without being a representative of a stakeholder *organisation*. Nominees may not currently hold a representative function or be a staff member of the nominating organisation.

The first Register Committee members were approved by EQAR's Founding Assembly on 4/3/2008. The Register Committee's second mandate began on 1/7/2010.

#### **d) Appeals Committee**

The Appeals Committee has the responsibility to consider appeals against decisions of the Register Committee.

The Appeals Committee consists of a chair, two further members, a deputy chair and two deputy members. They are elected by the General Assembly for a mandate of four years and may not serve on any other body of EQAR.

The Appeals Committee convenes as necessary when appeals have to be considered.

#### **e) Secretariat**

The Secretariat is in charge of the daily management and operation of EQAR. It supports all other bodies in their work, ensures the information exchange between different bodies and serves as contact point for external enquiries.

The Secretariat comprises the Director (full-time) and one part-time (0,6 FTE) Executive Officer.

#### **f) Financial Resources**

EQAR has annual operational costs of approximately EUR 250 000.

The three main funding sources are annual membership fees paid by the Association members (26 governments, E4, BUSINESSEUROPE & Education International), application and listing fees from quality assurance agencies as well as start-up funding from the European Commission. Other funding sources are bank interest, cost reimbursements by third parties and donations<sup>6</sup>.

Figure 4 shows the make-up of EQAR's income by the different funding sources. Start-up funding was granted by the European Commission to facilitate the establishment of the organisation, but 2010 was the last financial year for which EQAR received a grant.

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<sup>6</sup> EQAR only received one donation, from the Swiss Confederation, in 2008.

EQAR has accumulated an operational reserve of EUR 20 000 as well as special reserves of EUR 40 000 to cover the costs of the external evaluation and of EUR 20 000 for extraordinary meetings. The General Assembly endorsed the principle that EQAR should establish a permanent operational reserve of approximately the annual operational costs (EUR 250 000).

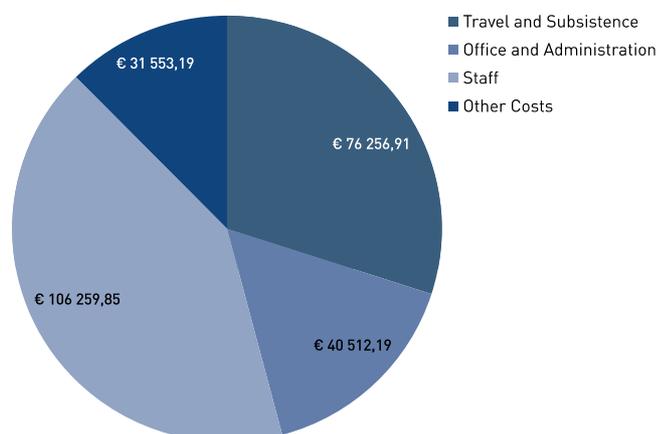


Figure 3: Expenditure of EQAR, 2010

### 3.3 Feedback and Self-Analysis

Ministers agreed in London (2007) that the Register should be managed by an independent, stakeholder-run organisation, founded by the E4 Group. The external evaluation is carried out in order to analyse the performance of EQAR in fulfilling this function. Thus, the present report does not address interviewee comments that question the ministerial decisions, since these are beyond the scope of the evaluation.

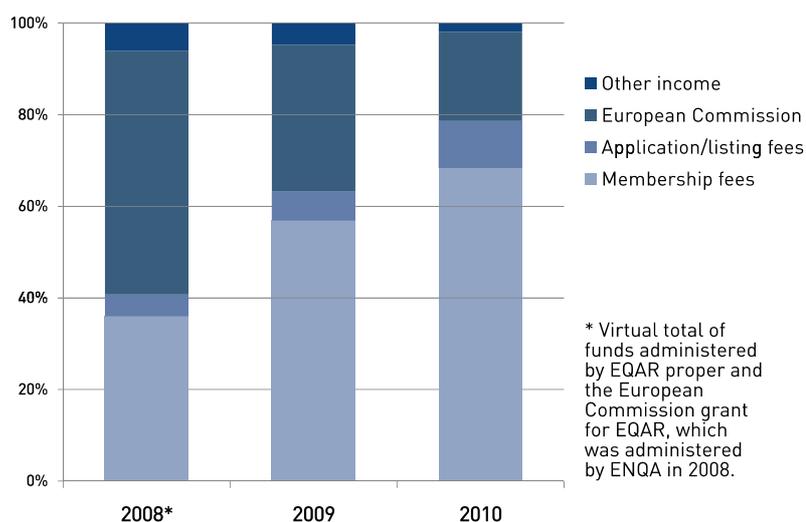


Figure 4: Funding sources, 2008–2010

The key challenge for EQAR’s founders was to develop an organisational structure that reflects the E4 Group’s responsibility for managing the organisation and that defines the Register Committee as an independent expert

body. This led to the chosen organisational form and structure, including a system of checks and balances between the different bodies of the organisation.

The main principle is to separate the general management of the organisation, which is in the hands of the General Assembly and the Executive Board, from the responsibility for deciding on inclusion on the Register, which is the exclusive responsibility of the Register Committee. At the same time, the Chair of the Register Committee is an ex-officio member of the Executive Board in order to ensure sufficient communication.

While some interviewees noted that the organisational structure appeared complex to them at first sight, they acknowledged the clear reasons for the chosen structure, rooted in EQAR's function and responsibility, the context in which it operates and the need for differentiated roles for both governments and stakeholders.

No interviewee suggested a (lighter) alternative to the organisational structure or made any suggestions as to what could be simpler.

Several interviewees underlined that EQAR's structure was not bureaucratic and operated efficiently and responsively.

#### **a) Role of Governments**

In the deliberations of the BFUG and the E4 Group leading up to the establishment of EQAR different views were expressed as to the appropriate role of governments in managing EQAR.

The range of views can be illustrated by comments of two different Governmental Members. One stated that they were "very reluctant about the country membership at the time when it was set up. [...] It was the concept of country membership combined with the wish we had that EQAR should be an independent body, independent from the nation states." Another member called for more governmental involvement and stated that "the final decision [on admission of quality assurance agencies to the Register] should be taken by the General Assembly."

The different views resulted in a compromise on the organisational structure, with an important but limited role of governments. This decision is reflected in the composition of the Executive Board, which includes no governmental representatives, but only Founding Member representatives, as well as the presence of five governmental observers on the Register Committee.

The Bologna Follow-Up Group (BFUG) nominates these observers from amongst all countries participating in the Bologna Process. From EQAR's perspective, this arrangement has some unfortunate consequences. In particular, observer governments may not all be Governmental Members of EQAR. EQAR would normally expect countries to be Governmental Members if they have a close interest in the workings of EQAR. Furthermore, a situation where some observers are also Governmental Members, and thus represented in the General Assembly, while others are not, may not be beneficial for the dynamics of the organisational structure.

Most interviewees expressed satisfaction, however, with the general organisational setup and found that the division of responsibilities between governments, stakeholder organisations and the Register Committee was

generally appropriate. Several governmental representatives stressed the crucial importance of the Register Committee's ability to decide independently and of avoiding any governmental influence on its decisions.

19 governments joined EQAR as Governmental Members when it was founded, exceeding the expectations of the E4 Group. Now, with 26 Governmental Members (25 countries) more than half of the Bologna Process countries are represented.

The interviews, however, show that governments are not fully satisfied with the existing possibilities to engage within EQAR, and sometimes lack a strong sense of ownership. The interviews show that being a Governmental Member of EQAR is not regarded as an opportunity to contribute actively to the building of the European Higher Education Area (EHEA). While there are a few notable exceptions, many members currently do not seem to consider promoting the Register and its use to their constituencies as part of their responsibility to support EQAR's mission.

The most apparent reasons for this lack of ownership appear to be (a) a lack of knowledge about EQAR, including the difference between governmental membership and registration of the national quality assurance agency, and (b) the feeling that the General Assembly does not provide a genuine opportunity for governments to engage in the governance and development of EQAR.

In various interviews it was proposed that the General Assembly should hold general strategic discussions about EQAR's future development. Several interviewees have proposed that EQAR should put more focus on providing a forum for governments to engage in policy discussions on quality assurance and EQAR's role in it. Some have also expressed the wish that EQAR should become more visible in policy debates.

EQAR is a unique platform, complimentary to the BFUG, for governmental representatives as well as stakeholders to discuss the development of quality assurance at European level. In providing a forum for and actively contributing to policy debates EQAR would have to establish a clear link with its core function as a register of agencies and to avoid compromising its values, independence and integrity.

## **b) Role of Stakeholders**

The rationale for the Register Committee's composition is to reflect at European level the joint responsibility for quality assurance of the different stakeholders and thus bringing together experts in quality assurance with different backgrounds, such as quality assurance professionals, academics, staff and students of higher education institutions, and people from the business community.

This concept is wide-spread practice amongst national quality assurance agencies in Europe. In many countries, various national stakeholder organisations (such as rectors' conference and students' unions) nominate the experts who serve on quality assurance agencies' boards or committees. Several interviewees have expressed their support of this model.

Most interviews and survey responses show that there is high confidence in both the professionalism and independence of the Register Committee and its decision-making process. However, there have also been critical comments on

the composition of the Register Committee of stakeholder nominees, questioning whether the current arrangements ensure sufficient expertise of the Register Committee members as well as independence in their decision-making.

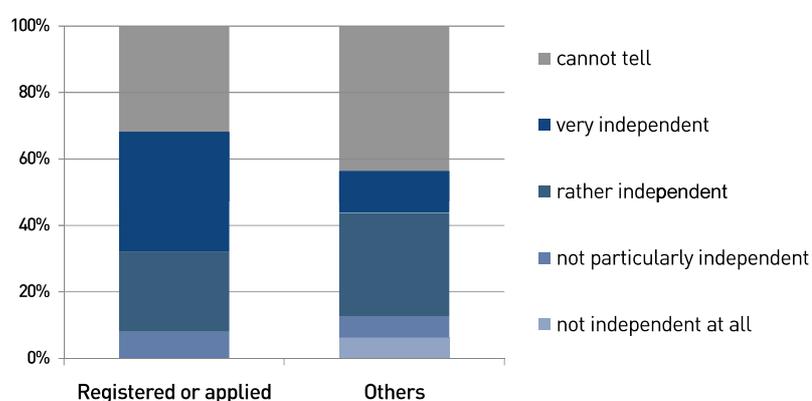
### c) Independence

The need for a European register of quality assurance agencies to be managed independently of individual governments' or stakeholder organisations' influence was underlined by the E4 Group in its report to the London Summit: "To ensure trust and confidence in the decisions it makes, the Register requires its own independent structure and organisation."

EQAR's founders foresaw the Register Committee in particular as the safeguard of independence in decision-making on applications for inclusion on the Register. The interviews confirm that the Register Committee is regarded as an independent body which is able to work without undue influence by external stakeholder or other EQAR bodies.

Even though EQAR has tried to be explicit that Register Committee members are not representatives of their organisation, a few nominating organisations sometimes use the terminology "to have a representative" on the Register Committee, both in the interviews as well as in other contexts.

Most surveyed quality assurance agencies describe the decision-making process as "rather independent" or "very independent" (42% each). However, respondents who were in doubt about the independence did not refer to any clear examples that gave rise to these doubts.



**Figure 5: Perception of the independence of the decision-making process by agencies that are registered or have applied for inclusion and others**

Slightly more than a third of respondents (37%), however, did not see themselves in a position to express a view on the issue of independence. Some of those have commented that they found EQAR's work insufficiently transparent to comment on or that they lack sufficient insight. As shown in Figure 5 those quality assurance agencies that are on the Register or have applied for inclusion find themselves in a better position to comment than others, and rate the independence better than others.

### d) Internal Communication between EQAR Bodies

At the time the Register Committee was considering the first batch of applications for inclusion on the Register, the General Assembly did not find

itself sufficiently informed about the process and principles of the Register Committee's decision making.

At the General Assembly meeting in March 2009 (Prague), following the Register Committee's first decisions of November 2008 the transparency of the Register Committee's decision-making process was subject to intensive discussion.

In considering the first applications, the Register Committee was mindful of ensuring the independence of its deliberations and the confidentiality guaranteed to (unsuccessful) applicants. The Register Committee was thus careful not to identify applicants indirectly by discussing details of the decision-making. While considered necessary to avoid jeopardising the principles of independence and confidentiality, the Register Committee acknowledged that this approach did not satisfy members' demands for transparency.

Following this discussion, the Register Committee set out to strike a better balance between confidentiality, independence and transparency of its decision making. The Committee presented a report to the following General Assembly (September 2009, Stockholm) in order to provide a comprehensive account of its process and application of the criteria and procedures in place. This was highly welcomed by members. Several interviewees reaffirmed that the report appropriately addressed the need for greater transparency.

The distribution of functions between the General Assembly, the Executive Board and the Register Committee, and the internal communication between these bodies, has also been a major issue for discussion at the first Joint Informal Meeting of EQAR bodies (June 2010, Barcelona). While such discussions were considered natural in the evolution of a relatively new organisation it was agreed that the internal communication had to be improved.

In October 2010, as one of the first measures the Secretariat produced a first Internal Newsletter for members of the Executive Board, Register Committee and Appeals Committee. It included the main activities and decisions of the various EQAR bodies.

#### **e) Resources**

For the first 2,5 years EQAR has been able to operate within the estimates drawn up by the E4 Group in its financial planning.

A fair number of governments decided to join EQAR as Governmental Members right at its founding. Thanks to this as well as to the start-up funding received from the European Commission and a donation from the Swiss government, the financial situation has been viable thus far. To remain sustainable in the future EQAR will, however, require a stronger commitment of governments to engage as Governmental Members of EQAR and to contribute financially.

The current financial situation enables EQAR to maintain a Secretariat of two staff members (1,6 full-time equivalent). This has been just sufficient to handle the core tasks within EQAR's current mission and functions: to support the statutory bodies in their work; to serve as a contact point for applicants, partners and other externals; to promote and represent EQAR in meetings and conferences; to deal with administration and finances.

EQAR believes that its present staffing level represents the absolute minimum to carry out the required core functions. This view was shared by some

interviewees. The current resources do not enable EQAR to carry out additional activities, such as:

- an external newsletter
- provision of additional information on the EQAR website, requiring additional regular updating
- more systematic monitoring and tracking of the use and impact of the Register, especially beyond the national level
- increased presence in policy debates
- submission of papers and proposals for relevant conferences

These and other activities were proposed at the Joint Informal Meeting, by EQAR members, interviewees or survey respondents. They would, however, require hiring additional staff, which the current financial situation does not permit.

### 3.4 Conclusion and Proposed Action

By and large, stakeholders and governments consider the organisational structures of EQAR fit for purpose. While experiencing a number of typical challenges of new organisations, such as the internal communication between its bodies, EQAR finds that its structures have worked effectively and efficiently.

EQAR considers ensuring broader support and engagement of governments as well as securing sufficient resources for its work as the main future challenges.

EQAR will give attention to the following actions with a view to improving the fitness for purpose, effectiveness and efficiency of its organisational structure:

- To further encourage its governmental and stakeholder members to promote actively EQAR among their constituencies and beyond.
- To further develop the General Assembly into a forum where government representatives can engage in strategic discussions on and influence the development of EQAR, and where broader policy discussions in relation to quality assurance are held.
- To continue producing regular reports by the Register Committee to the General Assembly and to focus on being as transparent as possible about the Register Committee's decision-making process.
- To improve communication between the EQAR bodies and to continue producing a regular Internal Newsletter.
- To explain more clearly that the nominees on the Register Committee are not *representatives*, but *independent* experts with different stakeholder backgrounds and to clarify this towards the nominating organisations.
- To establish a Code of Conduct for committee members and staff, addressing, for instance, the principle of Register Committee members not acting as representatives of "their" organisations in QA-related matters.
- To specify in greater detail the desired profile for future nominations to the Register Committee. The profile should be adopted by the General

Assembly. Nominating organisations should be asked to motivate their nomination.

- To review the arrangements for the nomination of governmental observers on the Register Committee.
- To organise a Joint Informal Meeting annually or every second year.
- To address at the next Joint Informal Meeting the functions of and relations between EQAR's statutory bodies, and to investigate whether any specific measures are needed and whether there is a need to revise the functions or memberships as defined in the Statutes.
- To explore possibilities to seek additional resources that would allow an expansion of the current Secretariat and to diversify its funding base with a view to avoiding over-dependency on one single funding source.

## 4. The Work of the Register Committee

### 4.1 Mission

The Mission Statement specifies that, in order to achieve its wider mission and objectives, EQAR “manages a register of quality assurance agencies operating in Europe that substantially comply with the European Standards and Guidelines for Quality Assurance (ESG).”

The Statutes make basic provisions, primarily stipulating that the ESG shall serve as criteria for inclusion:

Art. 20 - The Register

- (1) Any entity, whether established in the European Higher Education Area or elsewhere, may seek inclusion into the Register.
- (2) The Register Committee evaluates and decides upon the inclusion of the applicant.
- (3) To be included applicants shall demonstrate that they operate in substantial compliance with the European Standards and Guidelines, which will be demonstrated through the submission of appropriate evidence.
- (4) Full membership of ENQA (European Association for Quality Assurance in Higher Education) normally constitutes satisfactory evidence for inclusion in the Register.

The Mission Statement further sets out a number of key values to be respected in managing the Register:

EQAR **recognises the diversity of approaches** to external quality assurance and is therefore **open to all agencies**, whether operating at programme or institutional level, whether providing accreditation, evaluation or audit services.

EQAR is **committed to the principle on which the ESG are based**: external quality assurance should **recognise the central responsibility of higher education institutions for quality development and should be carried out by independent quality assurance agencies in a transparent, objective and responsible manner, involving their stakeholders and leading to substantiated results based on well-defined procedures and criteria.**

EQAR [...] is committed to **taking proportionate, consistent, fair and objective decisions.**

### 4.2 Description

#### a) Rules and Criteria

##### Procedures for Applications

The Statutes stipulate that Procedures for Applications are adopted by the Register Committee “in consultation with the General Assembly” in order to implement the statutory provisions (Art. 16 b and 20) in practice.

In May 2008, the Register Committee developed draft Procedures and consulted the General Assembly on the draft in June 2008. Taking into consideration the proposals and comments by the General Assembly, the Register Committee

adopted final Procedures for Applications on 6 August 2008 (see Annex VI). These include stipulations regarding:

- the criteria for inclusion on the Register (Art. 1 & 2),
- the application process (Art. 3 & 4),
- requirements for external reviews (Art. 5 – 8),
- the decision-making on applications (Art. 9 & 10),
- the validity of inclusion and out-of-sequence action (Art. 11 & 12),
- the publication of decisions (Art. 13) and
- the no-conflict-of-interest policy (Art. 14).

The Procedures for Applications were published on 8 August 2008. As yet, they have not been amended.

### **Guide for Applicants**

In addition to the Procedures for Applications, a Guide for Applicants has been produced by the EQAR Secretariat. The Guide summarises the stipulations of the Procedures for Applications in plain, non-legal language and supplements them with further explanation and information.

The first version of the Guide was published together with the Procedures for Applications on 8 August 2008. Revisions were published on 19 January 2009, 11 June 2009, 18 January 2010 and 13 March 2011 (latest version). These were based on feedback questionnaires sent to applicant quality assurance agencies after the first, second, third and fifth application round (see results in Annex XII).

### **Basis of Decision Making**

The E4 Group's report to the London Summit sets out the principle that "the evidence required for the demonstration of [substantial compliance with the ESG] shall be contained in a report of an independent review of the agency". Hence, agencies are required to undergo an independent external review of their activities prior to making an application for inclusion on the Register.

When the E4 Group developed the operational model for EQAR it was considered important to avoid any duplication of external reviews of quality assurance agencies. It was thus agreed that EQAR should accept reviews carried out at national level as well as those organised for the purpose of ENQA membership.

This requires EQAR to work with reports that were produced for other (additional or different) purposes than registration on EQAR, and that are coordinated outside EQAR's control. In addition, EQAR's founders were committed to avoiding bureaucracy and minimising administration, leading to the explicit stipulation that EQAR *should not* coordinate external reviews itself. Consequently, the Register Committee decides primarily on the basis of external reviews carried out outside its control.

Decisions made by the Register Committee are therefore based on the factors prevailing when the external review was undertaken. Changes implemented after the external review can only be taken into account to a limited extent, since they were not scrutinised by an external panel.

EQAR does not have an improvement-oriented function and cannot decide on the basis of anticipated or planned future developments.

### **Requirements for External Reviews, Two-step Procedure**

In order to ensure that EQAR's decisions are made on a reliable basis the Procedures for Applications contain the following requirements for external reviews to be eligible in support of an application for inclusion on the Register:

- The review must be coordinated by an organisation that is independent of the applicant and has the necessary professional capacity (Art. 5).
- The review panel has to comprise at least four persons who have sufficient knowledge, experience and expertise for that task. It has to include at least one international expert, one academic staff member and one student (Art. 6).
- The self-evaluation report has to reflect on the applicant's compliance with the ESG (Art. 7).
- The external review report has to provide sufficient evidence of the applicant's substantial compliance with the ESG (Art. 8).

The decision-making on applications consequently follows a two-step procedure:

- 1) examination of an application's adherence to the Procedures for Applications, primarily regarding the conduct of the external review process
- 2) consideration of the applicant's substantial compliance with the ESG

While substantial compliance with the ESG is the decisive criterion for inclusion on the Register, the requirements for external reviews are obligatory and a precondition for proceeding to consider the application in relation to the ESG.

### **Duration of Inclusion and Applications for Renewal**

Accepted agencies are included on the Register for five years from the date of their external review report. Thereafter, agencies have to submit an application for renewal of their inclusion, based on a new external review report.

Rejected applicants may only re-apply after three years and based on a new external review report, unless the Register Committee explicitly waives one or both of these conditions.

Agencies that have withdrawn their application can re-apply at any time.

### **Out-of-sequence Action**

The Procedures for Applications foresee that the Register Committee may reconsider an agency's inclusion on the Register in case of doubt whether the agency is still complying substantially with the ESG. An agency might be removed from the Register or be obliged to undergo the next external review earlier than after five years.

All registered agencies are obliged to inform EQAR about significant changes, such as amendments of their statutes or quality assurance methodology, so that EQAR could launch reconsideration if necessary. No reconsideration has been launched thus far.

## b) Interpretations on Questions of Principle

In its decision-making on applications for inclusion on the Register the Register Committee has faced some questions of principle that are not explicitly answered by the ESG or the Procedures for Applications.

### Eligible Activities

The Register Committee faced two questions of principle as to what types of quality-related activities the ESG are applicable to.

Firstly, the Committee came to the conclusion that the ESG are applicable to *direct* quality assurance activities, i.e. reviews of institutions or programmes, and the agencies carrying out those, respectively. It did not consider the ESG applicable to other quality-related activities, such as standard setting or other meta-level functions.

Secondly, the Register Committee only considered those bodies eligible for the Register that conduct periodic, predefined external quality assurance activities under (a) permanent mandate(s) from (a) national (or regional) authority/-ies responsible for higher education.

The latter understanding is subject to the first appeal against a decision to reject an application for inclusion on the Register. This appeal is currently being considered by the Appeals Committee. Thus, this interpretation has not yet been communicated to potential applicants or the public.

### Geographical Scope of Inclusion

Several quality assurance agencies also operate in other countries than their base country. The Register Committee has faced the question which activities are under scrutiny for the purpose of inclusion on the Register.

Users of the Register will assume that all registered quality assurance agencies generally work in substantial compliance with the ESG. The Committee concluded that any limitation of the geographical scope of registration would risk jeopardising clarity and transparency. Furthermore, it might create an additional burden on registered agencies to communicate clearly limitations in scope.

As a rule, applicants are therefore expected to comply substantially with the ESG (in their evaluation, audit and accreditation activities) wherever they operate within or outside the EHEA.

## c) Decision-making Process

Each application is assigned two rapporteurs who have the responsibility to analyse the documentation and prepare recommendations for the deliberations of the Register Committee. The Secretariat assigns the rapporteurs following a fixed protocol, in order of receipt of applications.

Rapporteurs are only appointed to assess applications for which they have not declared any conflict of interest. In order to involve the different backgrounds the rapporteurs for one application are always members nominated to the Register Committee by different organisations.

The rapporteurs' work includes the following steps:

1. Each rapporteur individually reviews the application documents and records his/her comments on the Internal Assessment Sheet

2. The Director then passes the Internal Assessment Sheet to the other rapporteur
3. Rapporteurs discuss their findings in a teleconference facilitated by the Director
4. If necessary, and where a relatively minor issue can reasonably be clarified within about two weeks, clarification is requested from the applicant, the review panel or coordinator
5. Rapporteurs set out their agreed findings on the Internal Assessment Sheet
6. The Internal Assessment Sheet is submitted to the third rapporteur for review and comment.

Figure 6 provides an overview of the process.

### **Third Rapporteur**

The Register Committee has used third rapporteurs since the third application round, in the autumn of 2009, in order to strengthen the assessment process and enhance consistency.

The third rapporteur is assigned in addition to and comments independently of the main rapporteurs. The views of the main rapporteurs and the third rapporteur are not discussed or mediated; possible different perspectives on an application are brought before the entire Register Committee.

### **Possible Decisions**

Following the preparatory analysis by rapporteurs the application is considered by the Register Committee for the first time. Register Committee members do not take part in the deliberations on and do not receive the documentation related to applications for which they declare interest. Three outcomes are possible:

1. The application is approved
2. Further clarification is requested
3. The Committee considers rejecting the application

In the second case, the application is deferred to the following meeting, pending further clarification. Clarification can be requested from the applicant, the review panel or the review coordinator. Only twice has an application had to be deferred pending clarification.

In the third case, the applicant is informed of the grounds for possible rejection and invited to make additional representation on those matters (Art. 10 [2] of the Procedures). The application remains pending until the next meeting of the Register Committee, where it may be either approved or rejected, taking into account the additional representation made.

The applicant can also withdraw the application instead of making additional representation (case 3) or providing further clarification (case 2). In that case no decision is made on the application.

There is no possibility for an applicant's "conditional inclusion".

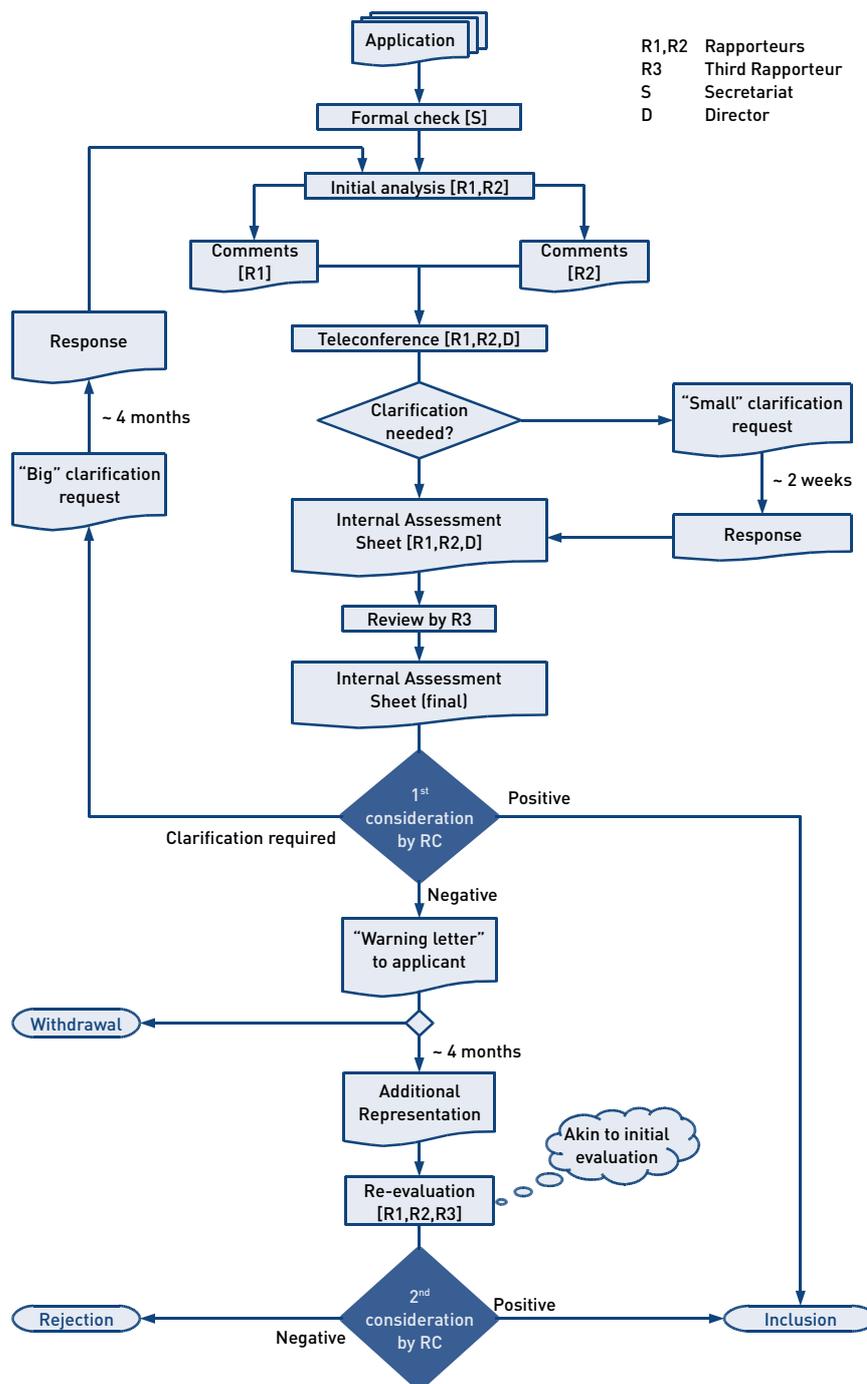


Figure 6: Overview of the application process

### Consistency

The Register Committee draws on a summarised record of previous decisions in order to identify relevant precedents and to ensure consistency in evaluating applications. Once a final decision on an application is made, it is added to an internal record of decisions.

The Secretariat regularly updates the record of decisions. It is reviewed at every Register Committee meeting before any new applications are considered.

It has been decided that in the future the Secretariat will maintain a generalised record of precedents in relation to the criteria for inclusion (requirements for external reviews, ESG) rather than a summary of individual cases. This is because the number of cases considered now allows for an analysis for the applications as a whole rather than for individual applications.

The Secretariat assists the rapporteurs in their preparatory work. Since it facilitates the rapporteurs' work on all applications, the Secretariat can also alert rapporteurs when an application might raise questions of consistency, for instance, in comparison with an earlier case or another application currently being analysed.

### **Flagging for Future Attention**

For almost all successful applicants the Register Committee has identified some areas where substantial compliance with the ESG is less obvious than in others, or which warrant particular attention in the future. The Register Committee has flagged such areas for particular attention when the agency subsequently applies for renewal of its inclusion on the Register.

Applicants are notified of flagged issues in their acceptance letters.

### **d) Publication of Decisions and Communication**

Applicants receive a formal letter by the Chair of the Register Committee as notification about decisions or invitation to make additional representation. Whenever EQAR requests any clarification from the review coordinator or the review panel the applicant receives a copy of the request.

Successful applicants are included on the public Register on the EQAR website shortly after having received their acceptance letter. The Register entry (Annex XI) contains the name and contact details of the agency as well as basic information on its work (provided by the agency itself on a Further Information Sheet).

Currently, EQAR guarantees confidentiality to unsuccessful applicants and does not disclose their identity.

### **Register Committee Reports**

The Register Committee prepared a "Report on the First Two Application Rounds" in 2009. The Report was presented to the General Assembly on 29/9/2009 and published in October 2009.

Concluding its first two-year mandate (ending 30/6/2010) the Register Committee compiled a Summary Report giving a comprehensive account of the Committee's work between 2008 and 2010.

The Summary Report also contains Recommendations for External Reviews. In addition to the formal requirements enshrined in the Procedures for Applications (see above), the Recommendations are a collection of good practices that the Register Committee found helpful in making judgements on the basis of external review reports.

### **e) Appeals System**

Applicants can appeal decisions of the Register Committee "on procedural grounds or in the case of perversity of judgement" (Art. 21 of the Statutes).

Should the Appeal Committee allow the appeal, the Register Committee has to reconsider the application and take due account of the grounds for the successful appeal.

The General Assembly on 25 June 2008 adopted an Appeals Procedure. It specifies what procedural grounds and perversity of judgement mean, respectively, and includes basic stipulations on the process to follow, including deadlines.

### 4.3 Feedback and Self-Analysis

The questionnaire to quality assurance agencies (Annex XV) and the feedback on the Guide for Applicants (Annex XII) suggest that agencies find the EQAR application process largely transparent, clear and efficient.

With few exceptions the EQAR website and the Guide for Applicants have been described as useful and informative. Several applicants noted positively that they were able to obtain clarification and technical assistance from EQAR easily.

Figure 7 shows the satisfaction of quality assurance agencies with different aspects of EQAR’s application and decision-making process. While the overall rating is very positive in all areas, doubts exist concerning the transparency of EQAR’s criteria as well as the proportionality, consistency and fairness of the decision-making. A high number of agencies (11 of 41) were not able to judge the latter, more than in any other aspect.

These two aspects are addressed in more detail below.

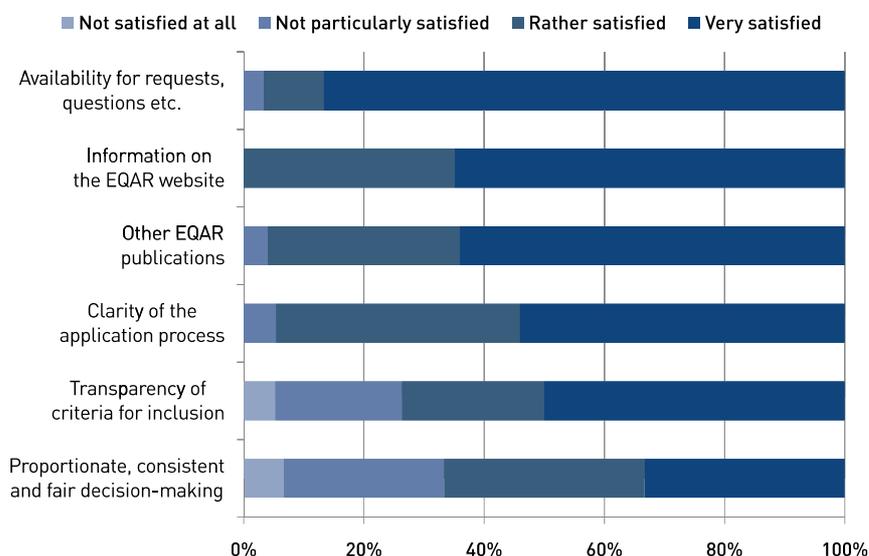


Figure 7: Quality assurance agencies' satisfaction with EQAR

#### a) Transparency of Criteria for Inclusion

The experience from the application rounds and the feedback in questionnaires indicate two areas in which the criteria for inclusion were not fully clear and transparent, (a) the requirements for external reviews and (b) the relation with membership of ENQA.

## Requirements for External Reviews

The Procedures for Applications were discussed and endorsed by the General Assembly, and are unambiguous as to the mandatory nature of the requirements for external reviews.

There have, however, been examples where the mandatory nature of these requirements was not clear to the applicants. There is currently no formal difference between a (possible) rejection on grounds of not meeting the requirements for external reviews and a rejection on substantial grounds, i.e. not complying with the ESG. This might have caused additional confusion to applicants.

Even though it might appear justifiable to make an individual exception, the Register Committee concluded that a strict approach was necessary in order to be fair and consistent, and not to jeopardise the reliability and integrity of its decisions.

Some external reviews were not organised for the purpose of inclusion on the Register. Therefore, not all reviews submitted to EQAR were set out with reference to the Procedures for Applications and the requirements for external reviews contained therein. A number of reviews submitted by the first applicants were actually conducted before the establishment of EQAR. Amongst the reviews submitted more recently there is more clear reference to inclusion on EQAR as a purpose of the external review.

In order to address the need for external review reports to provide sufficient reliable information, the Register Committee has included Recommendations for External Reviews in its Summary Report (see Annex X b).

These address, inter alia, the importance of external review reports to be written with clear reference to the ESG and to cover all (pertinent) activities of the agency under review. EQAR anticipates that the Recommendations will be helpful to external review coordinators and panel.

## ENQA Membership and EQAR Registration

Several agencies have pointed out that the relationship between EQAR's decision-making process and ENQA's membership decisions was not clear to them.

As a register, EQAR makes a public statement that an agency has evidenced its substantial compliance with the ESG and EQAR must be in a position to defend this statement. The Register Committee therefore needs to have full confidence in a decision to include an agency on the Register. Thus, ENQA members are subject to the same process and criteria for inclusion as any other applicant.

Full membership of ENQA is currently also based on substantial compliance with the ESG. Therefore the E4 Group, when founding EQAR, agreed that full membership of ENQA "normally constitutes satisfactory evidence for substantial compliance with the ESG". ENQA membership status is a piece of information in the Register Committee's decision-making: the knowledge that ENQA has already scrutinised the external review report and found, for its own purposes, that the agency substantially complied with the ESG establishes initial confidence.

ENQA and EQAR, however, each use and apply the ESG for their specific purposes and in the context of their unique mission. EQAR registration has the function of a “seal”, allowing agencies to demonstrate their legitimacy and credibility in terms of their compliance with the ESG. ENQA is a membership organisation of quality assurance agencies, representing their interests at European level, providing networking opportunities for agencies and allowing them to develop capacity. European ministers and stakeholders deliberately decided that the function of managing a register of agencies should be vested in a separate and independent organisation.

Both (the interpretation of) the ESG themselves and the notion of “substantial compliance with the ESG” leave considerable room for interpretation and discretion of judgements. Due to the difference between membership of ENQA, being rather developmental, and registration on EQAR, being rather compliance-oriented, it is natural that EQAR and ENQA might come to different conclusions as to whether an agency complies substantially with the ESG. In practice, this, however, only happened in three cases.

EQAR realises that this is not always easy to explain, since some agencies and individuals seem to consider “substantial compliance with the ESG” an entirely unambiguous criterion, even when applied by two different organisations for different purposes.

#### **b) Proportionate, Consistent and Fair Decision-making**

The respondents to the survey of quality assurance agencies that indicated they could not judge EQAR in terms of “proportionate, consistent and fair decision-making” are mostly agencies that have not yet applied for inclusion on the Register.

While the general perception amongst those who expressed an opinion is positive, some agencies do not seem to be fully satisfied that EQAR’s decision-making is consistent, fair and proportionate.

Some applicants were dissatisfied that changes implemented between their external review and the time of their application to EQAR could only be taken into account to a limited extent. This principle is, however, crucial to ensure reliability and integrity of EQAR’s decisions.

The rapporteurs present their analysis and the main reasons for their recommendations to the entire Register Committee, which then discusses the application and makes a decision. Even though all Register Committee members take part in the decision making, it is inevitable that not all Committee members can review and scrutinise all applications at the same level of detail as the rapporteurs. Given a typical load of 5 to 10 applications per application round, another approach would not be feasible. Since the introduction of third rapporteurs all applications have been assessed in depth by one additional Committee member.

At the Joint Informal Meeting it was also suggested that EQAR should establish an introduction and training scheme for new Register Committee members. In order to support new members’ full participation in the decision-making process they should be made sufficiently familiar with the criteria, procedures, working methods and important precedents.

Before the Register Committee meeting of November 2010, a first introductory session was organised for new members and observers, using the Internal Handbook of EQAR.

### **Applying the ESG with the Notion of “Substantial Compliance”**

The ESG were not initially intended as a compliance instrument, but EQAR was given the mission to use them as criteria for a register. This approach has certain inherent constraints and limitations.

Due to the nature of the ESG, as a set of principles rather than detailed norms, different external review teams cannot be expected to be entirely consistent in their judgements. The Register Committee aims to level out possible different interpretations of ESG compliance in order to ensure consistency in its own decision-making. It is thus possible that the Register Committee, in analysing the findings and conclusions of the external review panel in the light of the evidence at hand, might come to a different conclusion as to compliance with the ESG than the panel.

The Register Committee has decided against using any numerical formula in determining what constitutes “substantial compliance” with the ESG. The ESG were not designed as a checklist. Since some standards and their respective guidelines are broader than others and some aspects are duplicated in the ESG (for instance, publication of reports in ESG 2.5 and 3.7) it was considered not prudent to use the existing ESG as a checklist *de facto*.

The Register Committee found it most appropriate to make holistic judgements after considering (in qualitative terms) how an applicant complies with each of the standards and its guidelines. The Register Committee believes that this approach allows best to judge each applicant on its own merits and taking appropriate account of its context.

In making its judgements the Register Committee also acknowledges that some standards and guidelines include more essential aspects than others, for instance those fundamentals also recited in EQAR’s Statutes and Mission Statement. While there is no formal hierarchy between the standards this consideration feeds into the holistic judgement.

This approach is certainly more complex than a checklist. Considering the ESG and their nature described above, the Register Committee, however, expects the chosen approach to yield best possible results in terms of proportionality, consistency and fairness.

Some quality assurance agencies appear to expect a “checklist-type” consistency in the Register Committee’s decisions. However, falling short of one specific aspect of the ESG might be acceptable if that is the only shortcoming, but in another case might add up to a list of issues that result in an agency not being considered substantially compliant in the end. This is a natural consequence of the chosen approach. Expecting checklist-type judgements or numerical rules would not be compatible with the nature of the ESG.

### **c) Confidentiality of Rejections and Withdrawals**

When developing the Procedures for Applications it was decided to keep rejections and withdrawals confidential. This was in order to avoid misleading information: a relatively new agency, which is not (yet) substantially compliant

with the ESG, but is developing its systems further towards compliance, might be publicly known as “rejected by EQAR”, with all the consequences this might have for its reputation. Due to the voluntary nature of EQAR a dubious establishment would, at the same time, be better off not applying for inclusion at all.

On the other hand, realistically, most people involved in European quality assurance matters know which agencies have applied for inclusion on EQAR, and which were rejected. As this knowledge spreads informally as rumours, the reasons for rejections are often spread inaccurately. Since EQAR has no means to correct inaccuracies this is in virtually all cases to EQAR’s disadvantage.

The question has also been raised how EQAR can expect agencies to publish decisions not to accredit an institution or programme and not make its own rejections public. While the relation between QA agencies and institutions is usually of a different nature (i.e. obligatory review rather than voluntary registration), this is one argument in favour of reviewing the current policy of confidentiality.

#### **d) Additional Representations and Possibility for Withdrawal**

Inviting applicants to make additional representation where rejection is considered has benefited the decision-making process. In some cases, applicants could make representations that clarified the existing information or helped to fulfil all requirements for inclusion. In other cases, applicants made use of the possibility of withdrawal to avoid a rejection decision.

There could be a risk if most agencies withdrew their applications to avoid a possible formal rejection. If that were the case borderline applications might receive less thorough attention than they deserve, since most would be withdrawn without a final decision. In reality, however, the cases at issue do not indicate that agencies use the withdrawal option imprudently.

#### **e) Respecting the Diversity of Quality Assurance Approaches**

The Register includes quality assurance agencies applying a range of different quality assurance processes and methodologies, such as institutional audits, programme accreditation, discipline-focused evaluations or institutional accreditation.

Two out of six unsuccessful applications failed because the applicant was not considered a quality assurance agency in the sense of how the RC considers activities to be applicable to the ESG (see 4.2 b).

#### **f) Follow-up and Out-of-sequence Action**

While the necessary formal provisions to follow up agencies’ activities after registration are in place, they have hardly been used thus far.

No registered agency has informed EQAR about any substantial changes as yet. One reason could be that the obligation to do so might not be sufficiently well known. To address this concern the Register Committee in its meeting in November 2010 decided to send annual letters to the registered agencies, reminding them of this obligation.

The Register Committee has considered one third-party complaint about a registered agency. While that complaint did not lead to consideration of any

action against the agency, the Register Committee concluded that a complaints policy would be helpful in order to handle future complaints more efficiently.

Two main principles would be (1) that EQAR may consider whether an agency's inclusion on the Register is justified but that it cannot second-guess the agency's reviews or decisions, and (2) that any complaint will have to be formulated with reference to the ESG.

#### 4.4 Conclusion and Proposed Action

EQAR and, in particular, its Register Committee have been managing the Register in the complex and challenging circumstances outlined above. Therefore it is worth noting that the external stakeholder feedback does not show major concerns as regards to its decisions being consistent, fair and proportionate.

EQAR will give attention to the following actions with a view to improving its existing processes:

- To revise the Procedures for Applications in order to reflect the two-step procedure (see 4.2 a) and formalise it, thus allowing for a distinction between rejections on the grounds of not meeting the "eligibility standards" (requirements for external reviews) versus not meeting the substantial criteria (ESG).
- To establish a record of precedent decisions structured along the ESG and other relevant rules (e.g. requirements for external reviews).
- To make its understanding and application of "substantial compliance" more transparent and to communicate that the nature of the ESG and the approach of "substantial compliance" cause some inherent difficulties and constraints.
- To explain more clearly the consequences of the differences in purpose and functions between EQAR and ENQA.
- To review its policy of confidentiality of applicants and consider whether full transparency (of successful and unsuccessful applications) would better serve its goal of transparency.
- To further develop an introduction and training scheme for new Register Committee members in order to familiarise them with the criteria, procedures, principles and important precedents.
- To investigate possibilities to further enhance the thorough scrutiny of applications in order to support the Register Committee's decisions.
- To develop a complaints policy in order to streamline the dealing with concerns about registered agencies.

## 5. The Initial Impact on the EHEA

### 5.1 Mission

The Statutes and the Mission Statement of EQAR set out as its broader mission to further the development of the European Higher Education Area (EHEA) by enhancing trust and confidence in higher education and by promoting mobility and recognition.

In particular, EQAR's mission is to provide clear and reliable information on quality assurance in higher education – by managing a register of agencies – in order to:

- Enhance trust amongst quality assurance agencies and higher education institutions
- Facilitate the mutual acceptance of quality assurance decisions and results
- Reduce opportunities for “accreditation mills” to gain credibility
- Provide a basis for national authorities to authorise higher education institutions to choose any agency from the Register, if that is compatible with national arrangements

### 5.2 Description

#### a) Applications for Inclusion on the Register

While there are probably about 60–70 quality assurance agencies in Europe, there are, to EQAR's knowledge, about 40 quality assurance agencies that have undergone an external review of their activities and thus are in a position to make an application for inclusion on EQAR. By 30 March 2011, a total of 34 quality assurance agencies had made applications for inclusion on the Register.

24 applications were approved. The Register Committee has rejected three applications, of which one has filed an appeal. The appeal is currently pending consideration. Three agencies have withdrawn their applications to avoid a possible rejection. One application is currently pending second consideration; three applications have not yet been considered (see Annexes VIII and XIX for details).

#### b) Use of EQAR in National Legislation

There are four countries that have included a reference to registration on EQAR in their national legislation. The following table summarises the examples:

<b>Denmark</b>	<p>Erasmus Mundus joint programmes, offered by Danish and foreign institutions in cooperation, do not require additional accreditation by the Danish national quality assurance agency, if they are accredited by any EQAR-registered agency.</p> <p>Danish institutions may only issue Danish diplomas for programmes offered abroad if they are accredited either by the national Danish agency or an “internationally recognised” agency. If an agency is registered on EQAR, it is automatically considered “internationally recognised”; otherwise, it has to</p>
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	prove this in an individual procedure to the Danish authorities.
<b>Germany</b>	Higher education institutions (HEIs) in Germany have to undergo periodic accreditation of their study programmes or at system level. Normally, HEIs can choose from amongst QA agencies that are accredited by a national regulatory body, the German Accreditation Council. Individual decisions from other agencies can be ratified by the Council, for instance accreditations of a joint programme between a German and foreign institution. This is subject to the agency being registered on EQAR or a full member of ENQA.
<b>Lithuania</b>	Lithuanian HEIs are subject to accreditation at institutional and programme level. While HEIs can opt for an external review undertaken by any EQAR-registered QA agency, the accreditation decision remains responsibility of the national QA agency.
<b>Romania</b>	All HEIs in Romania are subject to (initial) accreditation by the national QA agency, ARACIS. Once the HEI is accredited it is obliged to undergo periodic external evaluations. For these evaluations, HEIs can choose freely from amongst the registered agencies.

In Romania and Denmark, the national quality assurance agencies are obliged by law to seek registration on EQAR.

Two other national governments have made firm proposals (to the responsible parliaments) for a reference to EQAR in their national laws:

<b>Austria</b>	The Austrian government has proposed to re-organise the external quality assurance system in higher education. In the new system, public universities as well as university colleges, after having been accredited for twelve years, would be obliged to undergo regular institutional audits by the Austrian national QA agency or any other agency that is included on EQAR.
<b>Liechtenstein</b>	Being a small country, Liechtenstein has decided not to establish their own national agency for only one institution. Instead, the ministry of higher education will license (foreign) quality assurance agencies to carry out (periodic) accreditation. The ministry has announced that it will adopt a bye-law licensing all EQAR-registered agencies.

Representatives of a few further countries have mentioned general plans or ideas in the interviews: In the Flemish Community of Belgium, there are plans to allow higher education institutions (HEIs) to freely choose an agency for their reviews. Another proposal (from Germany) is to use EQAR as a proxy for ensuring that study programmes abroad are subject to sound quality assurance: “We provide student support (BAföG) also to students studying abroad and would of course like to be sure that the study programmes chosen by the students are of good quality and worth to be supported by tax payers’ money. [...] In future, I would therefore like to have a regulation that student support is granted on

condition e.g. that the programme [...] was accredited by an agency listed on EQAR.”

### c) External Communication

#### EQAR Website

The website (<http://www.eqar.eu>) is EQAR’s main communication tool. As well as the Register of quality assurance agencies, the website includes information on EQAR’s mission and objectives, the history of its establishment, the organisational structure, the criteria for inclusion and the application process.

A preliminary EQAR website was available from November 2007. The current website was launched in April 2008. It is based on the content management system TYPO3.

The Register proper contains the contact details and basic information on the work of all registered quality assurance agencies. The Register includes information on where the registered agencies are based and in which countries they operate. This information is purely informative and does not explain how the agency is embedded in the national regulatory framework(s) and external quality assurance system(s), including the formal implications of its work, if any. A mock-up entry is shown as Annex XI.

#### Publications

The following publications were released by EQAR:

Date	Description	Copies
March 2008	Information document	PDF only
August 2008	Guide for Applicants	PDF only
September 2008	General information leaflet	30 000 copies
April 2009	Annual Report 2008	1 500 copies & PDF
October 2009	Report on the First Two Application Rounds	Web only (PDF)
March 2010	Annual Report 2009	1 500 copies & PDF
November 2010	Summary Report of the 1 <sup>st</sup> Register Committee	PDF & 150 copies

The Annual Reports (2008, 2009) and a small number of leaflets were posted to about 400 contacts, including all EQAR members as well as the national rectors’ conference, students’ unions, quality assurance agencies and trade unions affiliated with EUA, EURASHE, ESU, ENQA or Education International, respectively.

#### Representation at Higher Education Events

EQAR representatives have participated in numerous quality assurance-related workshops, seminars and conferences. EQAR has had active contributions (presentations, keynote speeches, etc.) in about 15 conferences per year.

At the UNESCO World Conference on Higher Education (July 2009, Paris) EQAR was represented with a forum stand in collaboration with EUA and ENQA. At the

Fifth European Quality Assurance Forum (Lyon 2010) EQAR organised a stand at the Forum Café.

EQAR was invited by the European Commission to participate in a meeting together with the E4 organisations and ECA to discuss the follow-up to the European Commission's progress report on quality assurance (2009).

### **Communication with Partners and the BFUG**

EQAR maintains a database of almost 300 relevant contacts from European and national higher education organisations as well as the media. These are informed punctually about important news, such as the admission of agencies, new and updated publications.

For its Brussels-based partners EQAR organised combined office-opening and new-year receptions in 2009 and 2010. About 35 people working in different higher education organisations in Brussels attended each event.

EQAR has been reporting regularly to the Bologna Follow-Up Group (BFUG) on its work. At the BFUG meetings in Brdo (March 2008), Stockholm (September 2009) and Alden Biesen (August 2010), EQAR was also invited to report orally and answered BFUG representatives' questions.

## **5.3 Feedback and Self-Analysis**

Several governmental and stakeholder representatives have noted in their interviews that the establishment of EQAR has led to quality assurance of higher education (re-)gaining a prominent position in discussions on higher education at both the European and national levels. EQAR is regarded as a main tool in the development of quality assurance at European level, and the majority of quality assurance agencies that took part in the survey aim to be registered on EQAR.

In using the ESG and acting as a driving force for agencies to embrace the ESG in their work, EQAR has contributed indirectly to promoting the ESG across the EHEA. In particular, EQAR has strongly promoted a quality assurance approach based on stakeholder cooperation. Not only is the principle of stakeholder involvement enshrined in the ESG, but EQAR also reflects it as an obligatory feature in its requirements for external reviews.

It has to be borne in mind that EQAR's ability to systematically monitor and track its use and impact is currently limited. While EQAR is able to maintain a good overview of how the Register is used at European and national level it does not have the means to analyse the impact at, for instance, institutional level in detail. This is relatively normal for a young organisation, but also due to EQAR's limited resources.

### **a) Motivations of Quality Assurance Agencies to be Registered**

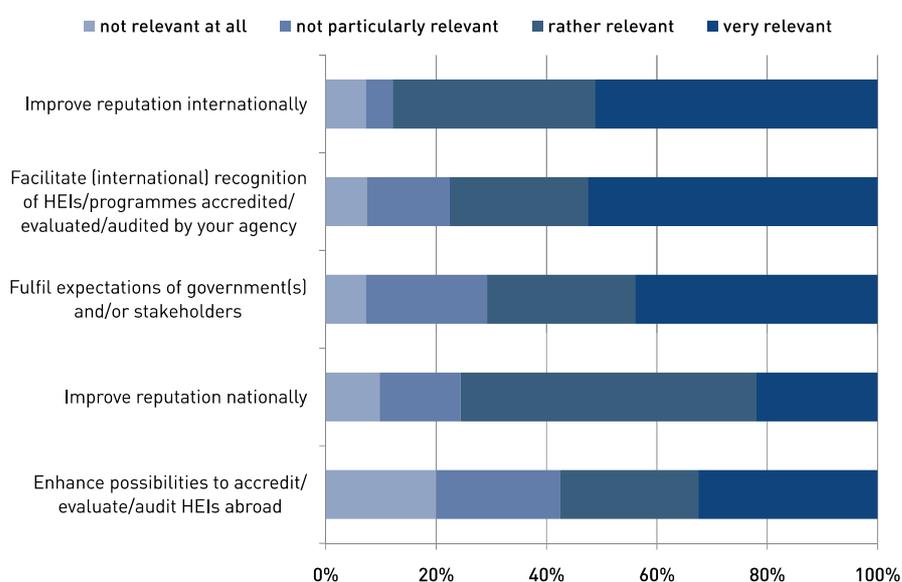
Half of the surveyed quality assurance agencies that have not yet applied for inclusion on the Register confirm that they plan to do so. Only 15% stated that they do not plan to apply, while the rest was not sure yet.

A few agencies expressed the wish for EQAR to organise seminars or training events for quality assurance agencies. These comments show a lack of clarity of EQAR's function. EQAR deliberately does not aim at being a forum for agencies, in order not to jeopardise its independent and neutral position.

The most often quoted reason for quality assurance agencies to be registered or apply for registration (Figure 8), respectively, is to improve their international reputation, i.e. to gain a better standing in relation with its international partners through demonstrating (publicly) that they have proven their substantial compliance with the ESG in a robust and reliable process.

This is followed by the desire to improve their reputation nationally, to fulfil the expectations of governments or stakeholders, and to facilitate the recognition of institutions or programmes reviewed by the agency. These three are considered, virtually equally, “rather relevant” on average. The figure shows the relevance attributed to different possible motivations.

Whether or not the latter expectation – improved (international) recognition of institutions and programmes that have been audited, evaluated or accredited by the agency – can be fulfilled also depends on a more formal, official recognition attached to registration on EQAR in different European countries. Quality assurance agencies seem to expect that to gain ground.



**Figure 8: Motivations for quality assurance agencies to be registered**

In the survey agencies were also asked how registration on EQAR has influenced and benefited their activities or how they anticipate it would, respectively. A few agencies stated that EQAR registration reinforced the need to align their systems and activities with the principles enshrined in the ESG. Most agencies again referred to improved recognition of their activities, at either national or European level, and to a better standing of the agency due to registration on EQAR.

### Non-European Quality Assurance Agencies

Thus far, EQAR had only one application from a non-European quality assurance agency, which was not successful. It, however, had contact with several non-European agencies that have expressed great interest in preparing for an application at a later stage.

From these contacts it appears that the existence and broad European mandate of EQAR is seen as the key reason for many non-European agencies to align their activities with the ESG.

In their contacts with EQAR non-European quality assurance agencies have mentioned two primary motivations for seeking registration on EQAR: firstly, to improve their opportunities of working with European higher education institutions by achieving a better recognition of their activities in Europe, at either formal or reputational level; and, secondly, to improve the recognition of higher education institutions and/or programmes from their home country in the European Higher Education Area, using their quality assurance activities and EQAR as a proxy.

In being attractive to non-European agencies EQAR is able to promote some of the more “typical” (but not exclusively) European principles in quality assurance, such as stakeholder involvement and publication of review reports, outside European borders. This is at the same time a challenge, since certain principles might be less common in other parts of the world.

Agencies might thus have significant difficulties in incorporating these in their work. Also the organisational and legislative contexts in which external quality assurance is embedded can differ significantly in other regions.

#### **b) Motivations of Governments for EQAR Membership**

A number of governmental interviewees have expressed their appreciation of being able to exercise an important function in the overall governance of EQAR as a Governmental Member. As regards governments that have not become members of the EQAR association, the interviews suggest two main rationales for that:

- Certain governments do not support the idea of governmental membership, but would prefer for EQAR to work without any relationship to governments.
- Certain governments are unable to commit financially, or they experience legal/administrative obstacles in joining a foreign, private-law association.

Currently, 67% of all European Union countries are Governmental Members of EQAR, whereas only 35% of the non-EU countries participating in the Bologna Process have become members. In their interviews, stakeholders and international organisations made clear their feeling that EQAR should strive for buy-in from all countries participating in the Bologna Process in the long run.

#### **c) EQAR as a Reference for National Legislation**

Several interviewees underlined the importance of governments using the Register, by, for instance, accepting the listing of an agency on the Register as a kind of state recognition of the agency, for EQAR to have the desired impact.

Given that EQAR has been operational for little more than two years it is satisfying that there are already six countries that use the Register as a reference point in their national legislation or have concrete plans to do so.

It can be assumed that countries would only take such a step after having observed how EQAR operates for a period of time and having satisfied

themselves of its reliability and integrity. The amount of time required for an initial idea to be developed into draft legislation and for a proposal to pass the parliamentary procedure also has to be borne in mind.

The existing examples and further ideas for using the Register indicate that there are three main ways for national governments to use EQAR as a reference tool:

- To allow the HEIs in their jurisdiction to choose a quality assurance agency that best fits their mission and profile. This might be to satisfy all or some of the external quality assurance requirements the institutions are subject to.

Such freedom for institutions to choose a quality assurance agency has been called for by the EUA as well as the national rectors' conferences of Austria, Germany and Switzerland

- To render the external quality assurance of joint programmes simpler by recognising quality assurance decisions or results of foreign, EQAR-registered agencies
- To recognise automatically study programmes that are offered by institutions that have been subject to external quality review by a registered agency.

The existing examples are, however, not sufficiently well known. Two interviewees who otherwise demonstrated very thorough knowledge of EQAR and awareness of its work did not know about the examples.

Efforts by EQAR to promote the existing good practice more effectively could encourage national governments to propose the necessary formal or legislative steps required for improving cross-border recognition of external quality assurance. Ultimately, however, governments in the EHEA have to commit themselves to such steps in order to support the emergence of a genuine European quality assurance space.

#### **d) Impact as Regards the Wider Goals of EQAR's Mission Statement**

Evidence gathered from interviews, the quality assurance agencies surveyed, and from interaction with the European higher education community suggests that EQAR has established itself as the authoritative information source about reliable quality assurance agencies in Europe.

#### **EQAR as an Information Tool**

Several interviewees indicated that EQAR is currently not sufficiently visible for it to be used as an information source by a large number of students or higher education institutions.

The information offered by EQAR is limited to basic information on the registered agencies and their types of activities. Many potential users (especially students) might, however, be more interested in information about whether (and with what result) a particular programme or institution has been subject to a trustworthy external quality assurance procedure, that is, the actual results of the agencies' activities.

This information is currently only offered indirectly, i.e. users have to proceed to the registered agencies' websites and acquire this information from there.

Especially for occasional or lay users, e.g. individual students or employers, this information is not easily accessible, due also to the language(s) in which information is offered.

Some interviewees have suggested that EQAR should provide information on national quality assurance systems, including the place of registered agencies within them and information on the formal recognition of registered agencies in the countries within which they operate.

However, keeping up-to-date information on the review activities and results of the registered agencies regarding institutions or programmes or on national quality assurance systems would cause a significant additional workload and could not be handled with the resources currently available.

Within the current resources the only feasible way to provide information on national systems would be if Governmental Members were able to provide that information. While this would be an avenue for greater involvement of Governmental Members, EQAR would have to establish processes to ensure that the information is of comparable quality and depth.

### **Impact on Quality Assurance of Joint Programmes**

Depending on the national legislative framework, the external quality assurance of programmes offered jointly by institutions in different countries might be less burdensome if accreditation/evaluation/audit by one EQAR-registered agency were to be accepted by national governments as sufficient. This would be of major impact on higher education institutions. Several interviewees mentioned legislative changes to this effect as an example of how to use the Register.

### **Recognition of Quality Assurance Results and Qualifications**

Several governments and stakeholders have expressed their wish that EQAR should become more widely used as a tool to support acceptance of external quality assurance processes and thus recognition of qualifications. The feedback by ESU suggests that benefits related to the recognition of qualifications and, through this, the enhancement of mobility would be necessary to turn EQAR into a tool of genuine value to (individual) students.

Currently, there is little evidence of institutions (or other competent bodies) using the Register as an information source in making recognition decisions. Using EQAR as a proxy, institutions can satisfy themselves that a programme – or the institution awarding a qualification, respectively – was subject to external quality review under a system in line with the ESG. The link to programme quality is only indirect and EQAR could thus hardly guarantee the quality of programmes and qualifications. Nevertheless, EQAR could reasonably be used as a tool to acquire relevant prima facie information.

EQAR assumes that currently only few institutions have any detailed knowledge about EQAR and its functions, since the immediate relevance for institutions is rather limited, except for those countries where agencies included on the Register enjoy some sort of formal recognition. It might not be feasible for EQAR to address higher education institutions directly. Most institutions would turn to their national rectors' conference or national information centre for academic recognition (ENIC/NARIC) for advice as to what information to consult in

recognition decisions. Therefore, these organisations should be considered as important target groups to be informed about EQAR’s work.

At one point it was proposed to the Lisbon Recognition Convention Committee adding a reference to EQAR in the “Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications”. This proposal met the opposition of non-European representatives. This underlines the need to promote further EQAR and its possible use amongst those involved in policy-making on recognition.

### e) Use of the EQAR Website

As of December 2010, the EQAR website had attracted about 6 000 visits per month. Since April 2008, when the number of visitors was about 1 000 visitors per month, this number has increased steadily (Figure 9).

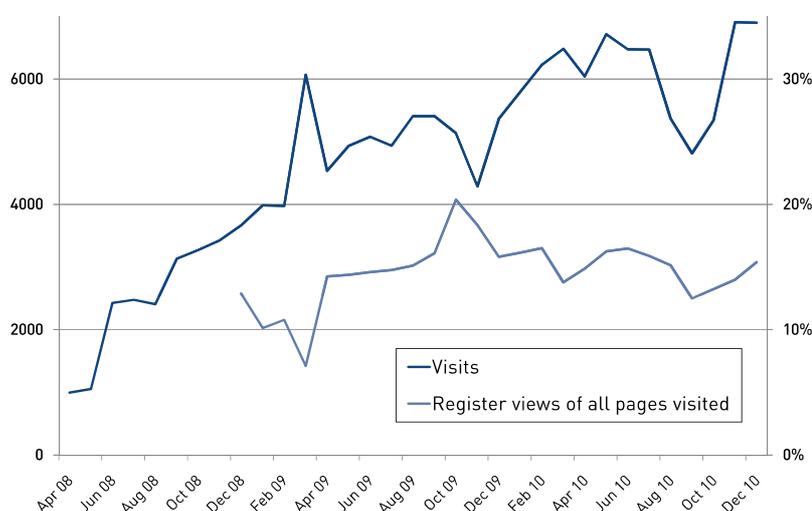


Figure 9: Website visits, Apr 2008 – Dec 2010

Next to the homepage (or start page), the Register of agencies is the most frequently visited section of the EQAR website. About 15% of all pages viewed were the Register overview or detail pages.

One respondent to the website visitors’ survey, however, indicated that they had difficulties finding the actual Register on the website. Following this comment, an additional box with a link to the Register was placed on the homepage.

The website statistics indicate that about 50% of requests to the EQAR website are by search engines etc.

### Visitor Profile

Even though the website users’ survey did not yield a very high response, it gives a good indication as to who visits the EQAR website. Most visitors are carrying out research on higher education or quality assurance and want to find out about agencies listed on the Register or learn about EQAR’s activities in general. A number of visitors mentioned the Summary Report by the Register Committee, which was published while the survey was open.

The shares of visitors finding out about EQAR’s website through (a) a search engine, (b) a colleague/friend or (c) a link from a registered agency are almost equal. One fourth of respondents indicated that they visit the EQAR website

approximately once a month. Only 4% of respondents visit the website more often; other respondents visit it less often or did so for the first time.

The biggest groups of visitors (see Figure 10) are staff and representatives of QA agencies, academic staff and students, followed by European institutions and NGOs. Some visitors, however, might easily fit into several categories (for instance, representatives of national rectors' conferences or students' unions). Most respondents were between 26 and 44 years old.

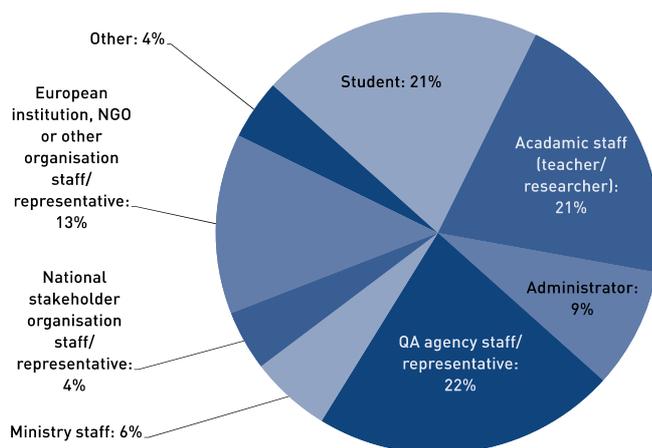


Figure 10: Profile of website visitors

About two thirds of respondents are well-informed about quality assurance of higher education in Europe (i.e. having had more than vague previous knowledge about EQAR and the ESG before visiting the website).

### Feedback

77% of respondents indicated that they found all or some of the information they were looking for. Only 6% did not find the information they needed; the remaining respondents found the question not applicable.

Figure 11 shows the respondents' impression about the EQAR website in various dimensions. The average rating is high in all dimensions.

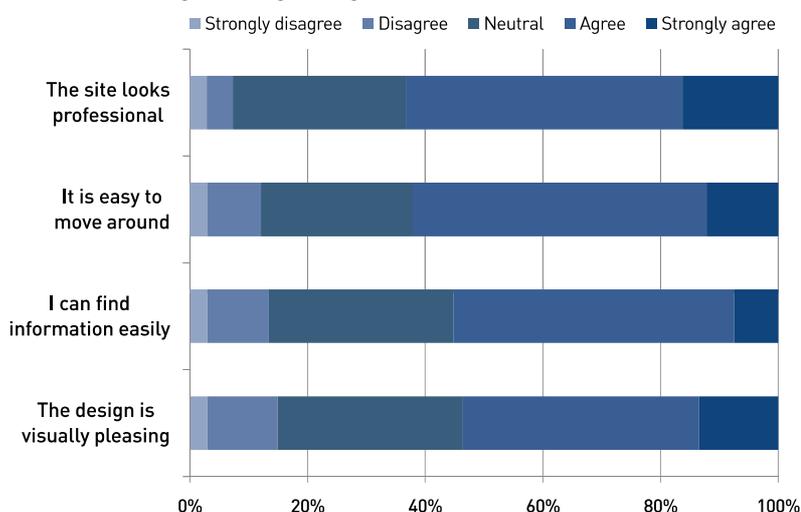


Figure 11: Website visitors' impressions

Generally, staff and representatives of QA agencies gave a better rating in all dimensions, while uninformed visitors (as regards EQAR and ESG) gave less favourable responses. Students visiting the website were more critical about the design than others.

The feedback indicates that the website in its current form is more accessible to an informed audience from the sector and less accessible to the occasional visitor.

#### 5.4 Conclusion and Proposed Action

EQAR had a significant impact on “soft” factors and is considered important by quality assurance agencies in order to demonstrate credibility in terms of alignment to European standards. The impact on “hard” factors, such as official recognition of the registered agencies’ activities in other countries, has begun to develop.

Given that the Register has been in place for little more than two years, EQAR is very satisfied that the idea of official recognition of registered agencies (along the lines mentioned under 5.3 c) has already gained ground in a few countries.

EQAR itself can only promote examples of good practice and support countries in their efforts, while (legislative or other formal) action ultimately has to be taken at national level.

EQAR will give attention to the following actions with a view to enhancing the use of the Register and achieving a greater impact:

- To further promote governmental membership of EQAR to the non-member Bologna Process countries, to address existing misgivings and misunderstandings, and to explain the advantages of being a Governmental Member. These efforts should address non-EU countries in particular and present information in an easily accessible manner.
- To promote better the examples of countries using the Register as reference in their national legislation. This may include an easily accessible overview on the website or a presentations of examples and a discussion at one future General Assembly
- To explain and promote more effectively how the Register can be used by institutions and students through more targeted and accessible information.
- To promote further the Register and the ESG outside the European Higher Education Area with appropriate cultural sensitivity while being firm on the ESG as standards for inclusion on the Register.
- To consider which additional information on registered agencies and their activities in reviewing programmes and/or institutions would be meaningful to institutions and students, and to evaluate what would be feasible with the current resources and what would require additional resources.
- To explore ways of Governmental Members contributing information for publication on the website on external quality assurance at system level.

- To develop a communication strategy including various measures to enhance the information it provides and to gain increased visibility among its target audiences.
- To develop a special seal, label or stamp (in addition to the normal EQAR logo) that registered agencies could use in their promotion.
- To focus the General Assembly's deliberations on strategic discussions on EQAR's development and policy matters related to EQAR.

## 6. Conclusions

The self-evaluation process has been a fruitful exercise for EQAR and enabled it to reflect systematically on its structures and activities, and what impact they have made on quality assurance of higher education in Europe.

EQAR also used the self-evaluation process as an opportunity to analyse the context in which it operates and to define more clearly what is within its own remit and what its limitations are. Based on the proposed actions in this report and the external evaluation panel's report, EQAR will be developing a Follow-Up and Implementation Plan, involving its members and all statutory bodies.

The first formal institution emerging from the Bologna Process, EQAR has successfully implemented a system of co-governance by governments and stakeholders, with the stakeholder organisations bearing the main responsibility for EQAR and the Register.

Within the first two years of its work EQAR has introduced the necessary systems to manage the Register of quality assurance agencies independently, with these systems by and large seen as fit for purpose, efficient and fair by its stakeholders.

Registration with EQAR, and thus ensuring substantial compliance with the ESG, has become a major goal that quality assurance agencies across Europe are striving for in order to enhance their international reputation and to improve the recognition of their activities abroad. There is a small, but given the short timeframe very satisfying, list of examples how national authorities have used the Register in practice.

Developing further its model of co-governance and the role of governments within this structure has been identified as one key future challenge for EQAR in order to ensure continuous support and to achieve greater ownership. EQAR will consider how to develop its General Assembly into a more relevant forum for governments to engage in policy discussions.

Following up the regular reports by the Register Committee introduced after the first application rounds EQAR will give further attention to enhancing the transparency of the Register Committee's processes and decision-making practice in order to increase trust and confidence in its work. EQAR will also review its current practice of confidentiality of applications and will consider whether a fully public approach would better serve its goals.

EQAR will develop strategies to enhance its external communication and to make the Register better known amongst the higher education community. In particular, EQAR will give attention to promoting more actively the existing examples of how the Register is being used. At the same time, EQAR will explore ways to monitor and track its impact more systematically and beyond the national system level.

The self-evaluation process supported EQAR in identifying areas for improvement and to consider actions addressing those.

Various additional expectations and suggestions have been raised, such as providing additional information on registered quality assurance agencies or on national quality assurance systems. EQAR will be considering these with a view to what is feasible and realistic within the current framework, using the resources and staff currently at EQAR's disposal.

In the long term, EQAR should continue to reflect on its mission and the framework within which it was established, and also consider whether any adjustments might be necessary to make the Register a more meaningful tool for quality assurance agencies, higher education institutions, students, governments and other stakeholders.

## List of Annexes

See EQAR Internal Website: <http://www.eqar.eu/publications/reports.html>

- I. Terms of Reference for the External Evaluation
- II. Members and Meetings of the SEG
- III. Ministerial Communiqués, E4 Report (extracts)
- IV. EQAR Statutes
- V. EQAR Mission Statement
- VI. EQAR Procedures for Applications
- VII. Composition of EQAR Committees
- VIII. Overview of Applications for Inclusion on the Register
- IX. Annual Reports 2008 2009
- X. Register Committee Reports
  - a. Report to the Third General Assembly, October 2009
  - b. Summary Report 2008-2010, October 2010
- XI. Mock-up Register Entry
- XII. Feedback on the Guide for Applicants
- XIII. Summary of interviews of governments and stakeholders
- XIV. Website visitor survey – raw summary of results
- XV. Quality assurance agency survey – raw summary of results

## Confidential Part (was available to the External Evaluation Panel)

- XVI. EQAR Internal Handbook
- XVII. Interviews of governments and stakeholders - full transcripts
- XVIII. Responses to the Public Call for Comment
- XIX. Applications for inclusion on the Register and decisions
- XX. Non-applicant quality assurance agencies