The Chair
Bologna Follow-Up Group   Gloucester, 26 March 2007

Dear Chair,

E4 report cover letter to the Chair of the Bologna Follow Up Group

On behalf of ENQA, ESIB, EUA and EURASHE, I am pleased to submit our report on the practicalities of implementation of a European register of quality assurance and accreditation agencies, revised in the light of the discussion at the last BFUG meeting in Berlin on 5 and 6 March.

A summary of the proposals in our report is attached to this letter (Attachment 1). There are a number of matters linked to the proposals, however, on which members of BFUG requested clarification. These relate to the form of the Register; the structure of the Register organisation; the role of EHEA governments; and the financing of the Register.

Form of the Register

The E4 Group recommends that entry to the Register should be restricted to agencies that meet agreed criteria. For this purpose, it proposes that substantial adherence to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be the criterion for inclusion into the Register. It further proposes that the evidence required for the demonstration of the fulfilment of this criterion shall be contained in a report of an independent review of the agency (normally undertaken on a national basis).

Ownership and Structure of the Register

To create legitimacy the E4 believes in a partnership approach based upon the involvement of all stakeholders in higher education. To ensure trust and

confidence in the decisions taken he Register requires its own structure. The E4 thus proposes that the Register should be managed by a non-profit, legally independent entity involving the members of E4, other consultative members of the BFUG, and the governments of the EHEA. The most appropriate location for the Register is Brussels, and the more appropriate form of organisation for the Register would be an *Association Internationale Sans But Lucratif (AISBL),* based in Brussels, Belgium.

Within the AISBL, and in accordance with the requirements attached to such an organisation, there would be a General Assembly, whose voting members would be made up of the organisations that nominate the members of the Register Committee; all the consultative members of the BFUG who were not on the Register Committee; and a number of government members (selected by the Bologna Follow Up Group). The General Assembly might also include additional, non-voting, members ('associate members').

The day to day management of the Register (including consideration of the applications for inclusion into the Register), would be in the hands of the Register Committee, which would serve as the Governing Board required by the regulations for AISBLs. Membership of the Register Committee would comprise, as voting members, eight members nominated by ENQA, ESIB, EUA, and EURASHE (two nominees each); and two members (one member each) nominated by the BFUG consultative members that represent the key social partners (i.e., Education International and BusinessEurope). In addition, five nominees selected by the BFUG would be non-voting observers, receiving all of the Committee's papers. The Register's administrative needs would be met by a small secretariat.

The role of EHEA governments

We have listened carefully to the views of the governments, as represented at the BFUG meetings, in respect of their possible role in the work of the Register. Some have expressed the view that, since the reviews on which inclusion in the Register are to depend are normally to be 'national' (in accordance with the Bergen communiqué), there should be no possibility that an agency denied recognition by its national authorities could gain entry to the Register; and that to ensure this governments should have full membership and voting rights on the Register Committee (where the decisions on inclusion would be made). On the other hand, the view has also been expressed in the BFUG and is held by the E4 Group that the integrity and independence of the Register would be seriously compromised if governments could vote or exercise a veto in respect of their own national agencies.

In acknowledgement of the strength of feeling of both points of view, the E4 Group proposes that the processes and procedures to be used by the Register Committee in respect of applications for inclusion in the Register should be subject to approval by the General Assembly, which will have BFUG representatives as members, but that consideration of individual applications should be undertaken by the Register Committee, which should not include representatives of governments as members. BFUG, or any successor body should, however, have the right to send up to five representatives to attend the Committee and receive its papers, in the capacity of observers, to ensure that it carries out its business in an appropriate and responsible way. The observers would not be members of the Committee or have the right to veto decisions of the Committee in respect of applications of particular agencies for inclusion in the Register.

We believe that this solution should enable the governments to play an important and central part in the organisation and functioning of the Register, but without giving rise to concerns about conflicts of interest or the independence of the decision-making body.

Financial arrangements

We have given much thought to possible sources of funding for the Register, and this topic has also been raised within the BFUG. Our estimates of the annual running costs of the organisation suggest that these are likely to be of the order of €185,000 to €245,000. The European Commission has generously offered to make a substantial contribution to the start-up costs, but funding arrangements in the longer term remain uncertain. Arguments have been made at the BFUG that would exclude funding by the E4 members (on the grounds of a shortage of funds); applicant agencies (on the grounds of conflict of interest, a shortage of funds, and double charging if they were also members of ENQA); and governments (on the grounds of the need for the Register's functioning to be independent of governments).

A compromise on funding will have to be struck, possibly through seeking a combination of sources, including, for example, application fees, annual subscriptions from General Assembly members, funding from any EHEA governments willing to assist, and from other appropriate European organisations. The E4 organisations will contribute non-financial resources to help with the establishment and maintenance of the Register. We believe that a combination of funding will ensure the independence of the Register and urge the BFUG to gives further thought to possible solutions.

The E4 Group believes that its report on the Register fulfils the ministers' wishes in the Bergen communiqué and trusts that the report will commend itself to them. We look forward to implementing the proposals and reporting back to the Bologna Follow Up Group in due course.

In addition to the report on the Register, we attach a report on the first European Quality Assurance Forum held in Munich in November 2006 (Attachment 2), which was also endorsed in Bergen. E4 considers the Forum to have been a very successful and important event. It has paved the way for a continuing and productive engagement between all the key stakeholder groups in higher education in Europe, thereby furthering the European dimension of quality assurance in the EHEA.

Yours sincerely,

Peter Williams
President
The European Association for Quality Assurance in Higher Education (ENQA)

Attachment 1: Summary of proposals

1. Entry to the Register should be restricted to agencies that meet agreed criteria.

2. Substantial compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be the criterion for inclusion in to the Register.

3. The evidence required for the demonstration of the fulfilment of this criterion shall be contained in a report of an independent review of the agency (normally undertaken on a national basis).

4. The Register should be managed by a non-profit, legally independent entity involving the members of E4, consultative members of the BFUG representing social partners and the governments of the EHEA.

5. The appropriate form of organisation for the Register would be an *Association Internationale Sans But Lucratif (AISBL),* based in Brussels, Belgium.

6. Draft statutes for the AISBL should be prepared only when the roles and responsibilities of the different members and membership categories have been agreed.

7. The processes and procedures to be used by the Register Committee in respect of applications for inclusion in the Register should be subject to approval by the General Assembly, which will have BFUG representatives as members.

8. Consideration of individual applications should be undertaken by the Register Committee, which would include representatives of governments as observers. Observers would ensure that the Register carries out its business in an appropriate and responsible way.

9. The Administration of the Register should be undertaken by a small, independent secretariat (about 1.5 FTE) accountable to, and appointed by, the Committee.

10. The Register should make use of evaluations of agencies carried out nationally or by ENQA, provided that they meet the criteria laid down in the ESG and that they provide sufficient information to allow a judgement to be made. To this end, Full membership of ENQA, for which the entry

criterion is also compliance with the ESG, attested through an independent review, would normally constitute *prima facie* evidence for inclusion in the Register.

11. The Register should be called the Register of European Higher Education Quality Assurance and Accreditation Agencies (REHEQA).

12. A compromise on funding will have to be struck, possibly through seeking a combination of sources, including, for example, application fees, annual subscriptions from General Assembly members, funding from any EHEA governments willing to assist, and from other appropriate European organisations.

13. The Register would be voluntary, that is to say, no agency would be required to apply for inclusion within it in order to continue to operate. Thus, the Register would have no legal consequences for governments.

14. The Register should consist of a database of agencies publicly available on its own website.

15. The operational description and associated regulations and procedures for the Register should be left to the Register Committee to draft and the General Assembly to discuss and approve, once they have been established.

16. The Register Committee should include an appeals procedure in its regulations.

17. Responsibility for commissioning revisions to the ESG should rest with the BFUG or any successor body; the BFUG should request E4 to recommend revisions when E4 considers it appropriate to do so.

Attachment 2

Report on the first European Quality Assurance Forum
23 – 25 November 2006, Technical University of Munich

1. The Berlin meeting of Ministers in 2003 placed quality assurance at the centre of the Bologna process. The Berlin Communiqué emphasised the primary role and responsibility of higher education institutions in ensuring quality. The Berlin Communiqué also invited ENQA, ESIB, EUA and EURASHE to develop European standards and guidelines for quality assurance in higher education. These were adopted in the Bergen meeting. This text, which was developed by the four organisations, also proposed the organisation of an annual European forum on quality – a proposal that was also adopted by the Ministers in Bergen.

2. The European QA Forum (EQAF) proposal grew from the observation that the dialogue among QA agencies, higher education institutions and students was occurring at national level but not at European level. When QA agencies meet at European level, these meetings tend to be benchmarking opportunities to discuss and compare methods and philosophy of QA practices. Similarly, when higher education institutions meet at European level, they tend to discuss how to adapt to their changing environment. Finally, when students meet at European level, their discussions are focused on comparisons of difficulties in their respective countries and identification of proposals for improvement. It seemed important, therefore, to create an opportunity for all actors to meet from across Europe to discuss quality issues in the context of the changing higher education landscape and to link more closely quality culture and external accountability processes.

3. That this forum was needed has been demonstrated by the high number of registrations and papers submitted following a call for papers for the Forum and a post-conference publication. Registration had to be closed early when the number of participants reached 350 because there was no capacity to deal with a higher number. Similarly, the organisers received nearly 80 papers for the various track sessions. Participants included representatives from 39 European countries and 6 non-European ones. These represented institutions of higher education, students, quality assurance agencies, researchers in higher education, governments and intergovernmental organisations.

4. The EQAF 2006 was focused on internal quality procedures. This topic was examined through case-studies and based on conceptual keynote presentations. The participants engaged actively in discussions and the following report summarises the main issues discussed.

5. The discussions about possible definitions of quality reinforced the approach of the European Standards and Guidelines (ESG), that quality is situational and that a single definition of quality is neither desirable nor feasible for both internal external quality assurance processes. The ESG presents the common purposes and common ideas about quality in Europe and should lead to a common European understanding of quality rather than a set of prescriptive of rules that would prevent the promotion of innovative higher education institutions.

6. Quality depends on context, particularly because the success of any system of quality is contingent on how the actors use it. Therefore, it is more effective and pragmatic to build upon the varied and common views of quality that are held by the multiple actors within a system. A fitness for purpose approach to quality will contribute to the development and strengthening of higher education institutions by taking into account their specific missions and profiles. When there is an alignment between the philosophy of quality and the tools and processes used, the impact of quality has been positive in improving quality. Similarly, it is important to link the internal quality and the external accountability processes.

7. Currently, however, quality assurance systems are threatened by other approaches (such as ranking or indicators) that promote quality as excellence defined on the basis of a few isolated, insufficient and traditional parameters, without due regards to the different missions and profiles of institutions. These approaches can lead to concealment of problems and a public relations approach to higher education and can be detrimental to raising quality levels. It is important, therefore, to develop reliable information tools for students and society.

8. Institutions are committed to developing internal quality processes and much progress has been made since the Berlin ministerial meeting, as evidenced by the numerous institutional case-studies presented at the Forum. There was wide agreement that internal quality processes can be effective in raising quality level and that the self-evaluation process that is part of both the internal and external quality processes is fundamental to this. Quality culture and external quality must be able to both accommodate diversity and to promote creativity in research and innovative teaching.

9. There was wide agreement that students and academics are central to quality culture as both contributors and the beneficiaries of the process and that these processes are beneficial to European society as a whole.

10. Programme evaluations facilitate student mobility and inter-institutional partnerships. These evaluations should be organised by the higher education institutions, with the contribution of external experts.   External institutional audits that review the robustness of internal quality processes are the way forward. It would be important to continue the evaluation or accreditation of programmes leading to the regulated professions.

11. The Forum was informed of progress in the E4 Group on the development of the practicalities of the Register of European quality assurance agencies. There was general recognition that the Register could be a useful tool, provided it is created with minimal bureaucracy and costs and that – like the Bologna process - it includes students and higher education institutions, because such a partnership has greatly contributed to its success.