Quality Assurance and Borderless Higher Education: Finding Pathways through the Maze

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Abstract:

Assuring the quality of education provision is a fundamental aspect of gaining and maintaining credibility for programmes, institutions and national systems of higher education worldwide. The increasingly borderless terrain for education brings with it a myriad of issues relating recognition of credit and qualifications, quality assurance of providers and accreditation of provision. A lack of clarity in terminology creates further complexity and confusion. Serious concerns are voiced about disreputable providers and educational misconduct – but where does the authority lie to identify international standards and regulate such standards? This report provides an authoritative overview of the often-overlapping international developments in quality assurance in borderless higher education. The authors provide a mapping of many of the most recent developments in quality assurance and identify and address some of the tensions inherent in applying quality assurance nationally and internationally. Emerging trends and issues are explored in an effort to draw out key lessons for institutions and policy makers.

This report reflects the views of the authors and does not purport to represent the opinion of their respective employers.

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1 Introduction

Through its role as an international strategic information service, the Observatory is tracking specific aspects of borderless higher education to identify the potential impact of these developments for higher education systems, institutions and agencies. In this paper we focus on quality assurance, a policy area that is not only deeply affected by borderless developments, but also heavily implicated in the task of addressing the dilemmas and consequences arising from them.

Quality assurance is an important part of academic professionalism. It is also a key mechanism for building institutional reputation or brand in a competitive local and global arena and a necessary foundation for consumer protection. Across the world, it is part of the armoury used by governments to increase, widen or control participation in the face of rising demand for higher education and it is central to current debates about higher education as a public good or tradable commodity. Quality assurance is also fundamental to the security of qualifications and the mobility of professionals. Without effective and appropriate quality assurance policies and practices, aspirations towards knowledge economies, lifelong learning, community development and social inclusion cannot be fully realised. It is for these reasons that quality assurance is receiving increasing attention at all levels.

In part one of our paper, we highlight the context and some of the ‘problems and issues’ to which borderless developments have given rise. In the second part, we map developments in quality assurance policies and practice, illustrating the ways in which quality assurance is being harnessed to provide ‘solutions’. We draw attention to issues that are being addressed or remain unresolved. In the third part, we summarise trends, speculate on future directions and provide some conclusions about the interplay between borderless developments and quality assurance. In providing this overview of the quality assurance territory, our purpose is to alert readers to ongoing initiatives and concerns that have consequences for institutions, agencies, countries and regions.

1.1 Context

Borderless higher education is driven by factors that reflect wider economic, social and political trends. These include developments in information and communications technologies (ICT), the growth of knowledge-driven economies, globalisation trends and requirements for lifelong learning. Such developments affect all sectors and countries, albeit in different ways. In addition, Newman and Couturier (2002) note four trends that appear to be affecting higher education across the world:

- Expanding enrolments (accompanied by shifts in student needs and expectations);
- The growth of new competitors, virtual education and consortia within the operating spheres of ‘traditional’ higher education providers and provision;
- The global activity of many institutions; and
- The tendency for policy makers to use market forces as levers for change in higher education.
Both the fundamental socio-economic drivers and these specific trends have their consequences for quality assurance, practically and politically. In essence, quality assurance has moved to centre stage for all the actors in higher education. At a national level, for institutions, quality assurance is usually key to accessing public funds and at an international level, it is also key to accessing new markets. For professions and disciplines, it ensures continuing student enrolments and the promise of employment as licensed practitioners. Governments seek to use quality assurance regulations to promote their national agendas or to counteract aspects of globalisation that may interfere with these agendas. As the learning landscape changes and becomes more complex, participants and purchasers of higher education depend on quality assurance arrangements to provide information and guidance about their educational choices. Quality assurance arrangements must also act as insurance, if not a guarantee, of the present and continuing value of educational investments.

1.2 Borderless Higher Education and Quality Assurance Issues

The term ‘borderless education’ was originally coined by an Australian research team (Cunningham et al, 1998). It was subsequently adopted and amplified by British researchers (CVCP, 2000) working in association with the Australians (Cunningham et al, 2000). The researchers describe the territory of borderless education as encompassing educational providers, provision and services that cut across conventional boundaries, both geographical and conceptual. The boundaries include:

- levels and types of education, such as further and higher education, vocational and academic, adult and continuing education; in some cases, this represents a genuine effort to create seamless life-long learning opportunities;
- private and public, for-profit and not-for profit education: combining ‘public good’ and ‘private gain’ organisational structures and forms of provision;
- state and country boundaries as in the many forms of transnational education;
- sector boundaries, for example, between business or the public sectors and higher education, creating new consortia, joint ventures and strategic alliances;
- boundaries of time and space that are crossed in the creation of virtual universities and online learning programmes.

The crossing or blurring of boundaries and borders is producing new educational forms and new educational opportunities, both positive and negative. On the positive side, new opportunities include corporate universities, blended learning, educational brokerage, international consortia, educational partnerships, joint degrees and e-universities (Middlehurst, 2003). On the negative side there is evidence of duplicity and fraud (CHEA, 2003; OBHE, 2003a) in the form of so-called diploma mills, accreditation factories, bogus degrees and fraudulent visa operators. There are also concerns about higher education as a tradable ‘commodity’¹. The net effect of these developments and their perceived impact, individually and collectively, is to increase competition and collaboration in higher education and to multiply existing complexities and concerns.

Borderless developments have other consequences that are less tangible and more profound since they challenge existing conceptual boundaries. The rise of corporate universities and expansion of for-profit education businesses, for example, has prompted questions about the nature and definition of ‘universities’ since the new entities do not always possess the same features as traditional institutions. Developments in work-based learning and the accreditation of experiential learning

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raise issues about the comparability and portability of credit and degrees, and the expansion of international trade in education is sharpening debates about the role and purposes of higher education and its relations with the state. These issues have practical consequences for quality assurance since existing definitions, standards, policies, processes, criteria, evidence and measurements are at one and the same time challenged by new developments and used to defend traditional boundaries.

Some specific examples may help to illustrate the quality assurance issues that can arise from borderless developments (further detail can be found in Middlehurst, 2001):

- Trade in higher education is growing, with different countries involved as exporters and importers of educational provision and services. Regulatory environments differ and institutions have to deal with a range of quality assurance requirements in different countries. From the perspective of governments, some countries are establishing sound regulatory regimes to guide and control local and non-national providers, others lack the resources or the mechanisms to differentiate between legitimate and fraudulent providers and provision;
- ICT developments are making virtual learning a growing reality and have increased the amount of distance learning provision available from a variety of providers. Some countries have quality assurance arrangements for these modes of learning, others do not;
- Collaboration between institutions to create new programmes and degrees requires at least ‘mutual recognition’ of quality and standards, if not directly comparable criteria and assessment practices to allow for credit accumulation and transfer. Guidelines, benchmarks and reference points do not exist in many countries at a national level and are still embryonic at an international level;
- Partnerships (and competition) between sectors and countries has given access to a range of new quality assurance mechanisms (such as industry standards and methodologies) and has increased the market for new accreditation arrangements and kite-marks; this is also increasing levels of competition between ‘accreditors’;
- The ‘unbundling’ of educational processes in ways that allow delivery by different providers, perhaps in different countries, is creating the need for quality assurance arrangements for each process (e.g. for learning centres, learning resources, educational guidance, assessment, teaching etc) as well as a need for quality assurance arrangements for whole new entities to assure the quality and standards of the qualifications awarded;
- New categories of provider, provision and service have given rise to problems of terminology and definition and these in turn affect understandings of criteria and quality assurance arrangements.

The dependence on quality assurance for different reasons by each of the key actors described above can be a source of tension as each player seeks to have their requirements and purposes reflected in regulatory frameworks and quality assurance arrangements. The dimensions of borderless higher education clearly add further layers of complexity and potential for confusion. As a result, the domain of quality assurance is fluid, contested and volatile, with an array of overlapping initiatives in train. Within this domain one can distinguish between ‘doers’ (the institutions and providers, professional associations, agencies and governments), the ‘thinkers’ (researchers and analysts) and the ‘talkers’ (networks of various kinds). Each of these players is making a contribution to the debates about quality assurance arrangements for the future, resulting in a great deal of activity, but also ‘noise’ in the
system. In the end, it is only the ‘doers’ that can decide and implement appropriate arrangements. In mapping the territory we will try to distinguish between the different voices and the varied political stances involved.

1.3 Problems of Terminology: dealing with complexity, confusion and change

Borderless education and quality assurance are both plagued by problems of terminology. For borderless education, the difficulties are associated with convergence of categories, overlaps between categories and the emergence of new categories. Official statistics often lag behind developments, and data that are necessary for quality assurance and other purposes may prove difficult to identify and collect. For example, an institution that is categorised as ‘public’ in one country (De Montfort University in the UK) may be designated as ‘private’ in another jurisdiction (De Montfort University Business School in South Africa). An institution may embrace both public and private entities (Tsinghua University and Tsinghua Tongfang, its private online venture, in China). And a ‘provider of higher education’ may include a bundle of provision and services each supplied by different providers (UNext and Cardean University in the US).

With quality assurance, the issues are different. They include the use of similar terms in different countries to cover rather different processes or the use of technically different terms to mean the same thing (for example, quality assurance, accreditation or recognition). The interrelationship of the two fields – borderless education and quality assurance - merely adds complications. As a consequence, most national agencies and international networks are seeking to create agreed glossaries of terms to facilitate dialogue and mutual understanding. Without a common ‘language’, shared and acceptable judgements and standards are difficult to reach.

In the following section we touch on the four domains that are relevant to this paper: Higher Education; Distance Learning; Quality Assurance and Trade in Educational Services. In each domain, there are few internationally agreed definitions, and where these do exist, ongoing developments are likely to require their amendment.

1.3.1 Higher education

The term ‘higher education’ is often used synonymously with other terms - tertiary education, post-secondary education or universities - but also has specific meaning in different contexts. In different countries:

- Timing (post 16 or 18), level (third stage or foundation), type of learning (education versus training, academic versus vocational), and range of study-fields differ;
- Differentiation may be institutional (polytechnics, community colleges, universities); elsewhere, such distinctions have gone (Australia and the UK, for example, have abolished their ‘binary line’); Alternatively, boundaries exist at the programme and degree level, rather than between institutions (as in the reforms proposed in the Netherlands);
- Functions may be differentiated - research or teaching institutions - or combined, and the qualifications awarded may or may not lead directly into employment (or may give access or not to particular employment sectors);
- Higher education includes study on programmes leading to degrees and a narrower definition linked to the award of a degree or diploma (the London
University External Programme is solely an examination system that leads to a degree; 
- Increasingly, ‘higher education’ includes education provided at recognised 
  universities and colleges that does not lead to a degree (such as adult 
  education and continuing professional development, often labelled ‘lifelong 
  learning’); 
- Higher education also includes education and training offered by other 
  providers (such as educational businesses) that leads to diplomas, degrees 
  and other kinds of qualifications or credit.

The implication of many aspects of borderless developments is that definitions need 
 to be both broader and more clearly articulated. The World Bank’s (2002) and 
 OECD’s (1998) use of the term ‘tertiary education’ is arguably more appropriate and 
 more accurate. Regulatory regimes will also need to create new and broader 
 definitions since these are necessary foundations for quality assurance.

1.3.2 Distance learning, distance education and e-learning

As John Daniel, currently Assistant Secretary General for Education at UNESCO has 
 stated, “distance education has evolved as a function of time, place and technology, 
 so it now means different things in different countries” (Daniel 1996). Across 
 countries, the terminology used to describe ‘distance education’ or ‘distance learning’ 
 often reflects Daniel’s three variables:

- In the US, distance education was often understood as the linking of students 
  in remote classrooms by simultaneous video-conferencing (synchronous 
  communication); in South Africa, distance learning describes educational 
  programmes that provide interactive study materials and de-centralised 
  learning facilities that students can access according to need, (i.e. 
  Daniel, op cit).
- In Australia and New Zealand, terms like ‘external’, ‘extramural’ or ‘off-campus 
  study’ reflect the fact that places of study are ‘at a distance from a formally 
  recognised educational establishment’. In several countries there is now 
  increasing diversity in study locations, from formally accredited learning 
  centres to homes, offices, public libraries, museums, shopping centres and 
  recreational spaces.
- In France, the technology of instruction is reflected in the terminology: distance 
  learning is called ‘tele-enseignement’.

ICT developments are bringing convergence in the two traditions of remote-
classroom and correspondence education and are also breaking down the 
boundaries between distance and on-campus learning. Convergence is happening 
both at the institutional and programme level such that ‘dual mode’ or ‘mixed mode’ 
provision (and providers) are becoming commonplace (Tait and Mills, 1999). The 
term ‘distance learning’ is now often used interchangeably with ‘open’ or ‘flexible 
learning’. The convergence of face-to-face and distance learning modes is also 
reflected in the term ‘blended learning’ which is widely used in the field of corporate 
education. Terms such as ‘virtual learning’ and ‘e-learning’ reflect the interaction of 
the variables of time, place and technology to create innovative educational 
opportunities that can be created and delivered by a wide variety of providers.
Developments in distance learning impact on quality assurance in that understandings of ‘the quality of the student’s experience’ will differ in relation to the context of learning, and the ‘quality of student learning’ itself may differ in relation to number of hours of study and ‘time on task’. Online learning providers seeking accreditation may not conform to standard accreditation criteria such as ‘numbers of PhDs among staff’, ‘residence qualifications for students’ or ‘quantity of books in the library’. In transnational contexts, there may be different understandings of the appropriate levels of attainment for particular awards and the assessment practices that underpin them. The quality assurance initiatives that we discuss in this paper are seeking to address such issues.

1.4 Quality assurance and regulatory frameworks

Quality assurance and accreditation arrangements in different countries need to be understood in the wider context of each country’s legislative and regulatory framework. In conceptual terms, approaches to quality assurance are part of a hierarchy of mechanisms used by the state (or states) both to grant powers to institutions and agencies and to exercise control (or seek accountability) for the ways in which these powers are used to deliver educational products and services and realise social and political objectives. Different arrangements across countries are linked to particular ‘quality policies’ that represent differing levels of devolution of authority from the state (or states) to agencies and institutions and with different histories of voluntarism and compliance to state expectations.

1.4.1 Legal and regulatory frameworks: national and international levels

At the top of the hierarchy, statutes and laws provide a general direction for quality assurance, in terms of legislation on human rights, discrimination, employment practices or health and safety. Legislation will also, in most countries and states, set out the formal powers of institutions and the regulatory framework which guides their governance and operations. Charters are another formal mechanism through which these powers are granted. Academic freedom and institutional autonomy as well as the awarding of degrees are often key aspects of legislation and charters. The legal framework may also establish the role and powers of those agencies charged with monitoring the exercise of institutions’ powers (such as accreditation or quality assurance agencies). The awarding of degrees and diplomas, the use of public funds and increasingly, consumer protection and information, are central concerns in most regulatory frameworks. In many countries, the development of intellectual, economic, social and cultural capital is also formally addressed. The legal position and powers of institutions differ across countries, as do regulatory frameworks.

1.4.2 Recognition and approval: institution and agency levels

There is considerable ambiguity in the terms: ‘recognition’, ‘approval’, ‘licensing’, ‘registration’ and ‘accreditation’ across countries. Formal ‘recognition’ is usually linked both to charters and statutes and to particular regulatory mechanisms such as ‘accreditation’ or to other processes associated with the granting of ‘degree-awarding powers’. In the UK, for example, such processes lead to becoming a formally ‘recognised’ or ‘listed body’ on a list maintained by the relevant government department. The regulatory framework may also provide formal ‘approval’ of those agencies charged with monitoring the framework and delivering its associated regulatory processes. It is clearly important in each country to know the official sources of ‘recognition’ and ‘approval’ and their practical manifestation in authoritative lists, databases and agencies.
Recognition and approval status may apply separately to national and non-national institutions, to institutions of different types (for example public, private and for-profit) and may also, in some countries, be linked to modes of instruction such as distance learning. It may also apply to the awarding of degrees or to the offering of programmes of study.

Other terms that are used - and either confused with or used synonymously with recognition and approval - include 'licensing' or 'registration'. These terms can refer to permission for an institution or organisation to operate as a business in a city or country and need not imply approval of the quality of its degrees. In other cases, licensing is a pre-requisite for accreditation, and is the authority for degree-granting status, but standards and criteria may vary (as is the case in different states in the US). ‘Licensing’ may also be used at degree-level as an outcome of the qualification that grants the graduate a 'license to practice’, as in the field of nursing or midwifery (although arrangements again differ across and within countries).

In the international context, another form of ‘recognition’ is particularly important: the recognition of qualifications earned in one country for use (for academic, professional or employment purposes) in another country. In some countries, there are national centres that provide advice or have the power to decide on the comparability of qualifications. Within the European Union, all countries have National Academic Recognition Centres (NARICs) although the status and competence of the centres vary across member states with some having legal competence to make decisions and others having an advisory capacity only. A wider network, the European National Information Centres (ENICs), operates under the auspices of the Council of Europe and the UNESCO-CEPES Europe region.

1.4.3 Accreditation: institution and professional levels

Accreditation can apply at institutional, programme or degree level. It is typically a formal process of enquiry against a set of agreed criteria (or standards). However, in many countries it is possible to award degrees without accreditation (e.g. through the granting of licenses) while elsewhere, as in many parts of Central & Eastern Europe public institutions may not even offer a programme unless it has been accredited. The process of enquiry is undertaken by a formally constituted body and will lead, if successful, to a formal status (as an accredited institution or accredited programme/degree). There may be different stages en route to full accreditation, for example, provisional or candidate, and the process may be voluntary or compulsory with a fee charged for the process.

Accreditation has a long history at institution and specialised programme level in the US and at programme/degree level in other countries (e.g. the UK, Australia). In the light of developments in borderless education, the concept of accreditation is gaining ground. Recent converts exist in continental Europe and in South Africa where a new accreditation process has been launched for private and for-profit providers. The outcomes of accreditation differ and include permission to run a programme, access to funding for institutions, programmes or students and license to graduates to practise as a professional.

1.4.4 Validation: agency or programme/degree level

Validation has much in common with programme accreditation. Typically, it describes an approval or authorisation process at programme level. In the UK, universities validate their own degrees (i.e. approve the curriculum design and content, learning resources and assessment methods). Another confusion is that in
Australia the term ‘self-accrediting’ is used instead of ‘validation’. In many professional areas such as engineering, law or medicine, validation and accreditation go hand-in-hand at the programme level to ensure appropriate academic and professional standards.

In addition to universities, authorised validating agencies may exist to approve particular types of programmes and awards. The UK’s Open University operates a Validation Service (OUVS) that validates programmes from a variety of providers. Provision often incorporates elements of distance learning and transnational arrangements. A further complication is that the power to validate degrees may also include the power to authorise others to teach all or parts of the programme leading to the award. This ‘authorisation’ leads to arrangements such as twinning or franchising where the educational process is shared between providers in different countries or is delegated to another institution (while the awarding function is typically retained by the home institution).

1.5 Quality assurance policies and arrangements: various levels

The term, ‘quality assurance’ may include:

- All the arrangements made at any of several levels (national, international, supranational, regional) to assure the reliability and quality of institutions, consortia, other providers, programmes, qualifications and other educational services. Thus recognition, accreditation and validation may be parts of a national, regional, or state-level quality assurance system.
- A narrower definition that refers to the monitoring and review of institutional activity from an internal or external perspective (or both) and refers to similar arrangements at the level of disciplines, programmes and awards.

Institutions will (usually) have their own internal quality assurance systems; professional bodies may monitor institutions’ programmes through an external review process and governments may also prescribe an external quality assurance process to review institutions, programmes, disciplines or wider educational activities. ‘Accreditation’ may be the term used to describe an external review process that is undertaken every five years or so. In other cases, an external quality assurance process follows accreditation (i.e. the latter provides initial approval, while the former offers a regular review mechanism). In several countries, the arrangements are different depending on the ownership, governance or economic status of institutions (i.e. public, private, for-profit or not-for-profit).

A ‘quality assurance system’ may (and arguably, should) include:

- Definitions and criteria that explain the scope and ‘confidence levels’ that the system is designed to achieve in relation to academic quality and standards. These two terms are often used interchangeably, but this may blur or obscure important distinctions. ‘Academic quality’ typically refers to the educational process, learning experience and resources for learning; ‘academic standards’ refer to outcomes such as student achievements and capabilities that are reflected in the qualifications awarded.
- A range of external reference points such as qualification frameworks and level descriptors, quality standards, benchmarks, codes of practice and guidelines. These reference points are designed to provide greater clarity and transparency about the meaning of ‘academic quality’ and ‘academic standards’ and to act as a basis for judgements. They are also potentially
important components in developing mutual understandings, interpretations and comparisons across countries.

- Review mechanisms such as self-assessment frameworks and review visits (assessments, audits or inspections). Different countries are increasingly using similar mechanisms, but it is still dangerous to assume that such mechanisms alone will provide common understandings of quality and standards and an adequate basis for mutual recognition across countries (as we discuss further below).

- Outputs from the system may include reports, gradings, published statistics, performance indicators, league tables and kite-marks and may lead to different outcomes (e.g. access to funding).

- Independent or integrated arrangements to promote and support quality improvement. These arrangements may produce best practice guidance, or develop support networks for practitioners and other interested parties. An example of the latter is the International Council for Open and Distance Education, officially recognised by the United Nations as the global non-governmental organisation responsible for the field of open and distance learning.

1.5.1 Trade in educational services

The import and export of higher education from one country or region to another is not new. What is changing is the volume of activity across the world and the range of types of ‘trade’ involved, both official and unofficial, linked both to profit-making and non-profit educational activities.

Since the World Trade Organisation decided in 1995 to include education within the scope of its General Agreement on Trade in Services (GATS), importing and exporting issues have entered a new arena. Leaving aside the political impact of these developments (which are covered in detail by Knight, 2002 and 2003), the GATS has provided us with some definitions that can be applied in relation to the import, export and ‘exchange’ of higher education in a variety of forms.

The ‘modes of supply’ within GATS are:

- **Cross-border supply**: where the service and not the individual cross a border (e.g. education and training offered via distance learning)

- **Consumption abroad**: where the individual travels across Member country borders to consume the service (e.g. individual students studying abroad)

- **Commercial presence**: where a service supplier (institution or other provider) establishes a physical presence in a second country to provide services (e.g. franchise or twinning arrangements, off-shore campus)

- **Presence of natural persons**: where an individual from one Member country supplies a service in another Member country (e.g. faculty exchange or visiting lecturers).

While these definitions of modes of supply are useful, the five sub-categories of education services used within the GATS framework are more problematic (i.e. primary, secondary, higher, adult and other). For reasons discussed earlier, definitions of higher education are widening to include adult (lifelong learning) and other forms of education (such as continuing professional development). It is not in practice easy to distinguish between ‘higher, adult and other’ since much convergence is taking place. There are also specific problems related to
transnational distance learning in that many types of provision do not fall neatly into just one category of the GATS terminology.

1.6 Beyond Terminology: quality assurance, reputation and educational misconduct

Beyond terminology, there are some other issues that are relevant to quality assurance and borderless education. They shed further light on the rationale behind current developments at different levels and in different parts of the world.

1.6.1 Quality assurance and reputation: providers and provision

In many cases, the reputation (for quality) of providers and particular forms of provision does not appear to be directly linked to the forms of quality assurance in use. For example, in some countries, degrees gained by distance learning have lower status than those acquired through face-to-face contact, despite the operation of relevant quality assurance; this may be manifested by governments barring access to certain public employment for distance learning graduates (e.g. in Indonesia). In other cases, public higher education providers may enjoy higher status than private or for-profit institutions, despite the latter being subject to stringent quality assurance arrangements while the former are not. In addition, the opposite situation may be true: particular forms of quality assurance (such as accreditation by international agencies) may significantly enhance the reputation of domestic private or public providers. Alternatively, acceptable quality assurance in one country may not be sufficient to assure quality within the regulations of another country.

Perceptions of what counts as ‘quality higher education’ and ‘effective quality assurance’ are often culturally and socially determined and may take a long time to build and change. Innovative developments such as transnational higher education or blended learning may take time to become accepted and valued – or conversely may be valued (for example by governments or students) for the new opportunities they offer beyond or in contrast to traditional forms of higher education. Formal quality assurance processes may be necessary - but not sufficient - to the building of a reputation for quality educational processes and outcomes. In addition, innovative forms of provider and provision may challenge traditional conceptions of ‘quality’ and associated quality assurance arrangements, producing the need for adaptations or totally new arrangements. ICT developments and the growth of transnational higher education are fostering calls for new arrangements at supranational level while at the same time, a wide range of regional, disciplinary and consortia arrangements are emerging.

1.6.2 Stages of development and quality assurance

The variety and complexity of developments in borderless higher education are creating increasing pressure on quality assurance agencies and their mechanisms. In some countries, it is difficult to respond since arrangements are at a rudimentary stage of development or are limited in scope. The present global diversity in quality assurance regimes makes the idea of mutual recognition of agencies and arrangements a formidable proposition to agree and undertake in practice. It also leads to other significant difficulties, for example, with the mutual recognition of qualifications. Many institutional, national and regional initiatives are seeking to build capacity by sharing information, practice and experience. However, given the social and cultural dimensions of ‘quality frameworks and reference points’ there is a danger of exporting or importing inappropriate models. Also, some models are
expensive and may impose economic burdens and other regulatory constraints on
countries or institutions. This is where notions of ‘trade liberalisation’ under the
auspices of GATS intersect with developments in quality assurance.

1.6.3 Quality assurance and educational misconduct

Quality assurance arrangements are designed to ensure that provision and providers
meet certain expectations (often in the form of formal criteria and standards) and that
there are levels of comparability and degrees of consistency in educational
processes. Rules and procedures form part of the system; these may (or should)
aim to control, \textit{inter alia}, forms of misconduct that can occur within the educational
process, for example, plagiarism or patronage, or more seriously, bribery and
corruption in assessment and grading.

The drivers behind borderless developments (such as the expansion in demand for
higher education, the growth in income-generating activities, globalisation and ICT
developments) have created a climate in which there appears to be more – and a
darker side to – educational misconduct. Anecdotally, the situation appears to be
significantly worse in some countries than others (although hard data is not easily
available). ‘Misconduct’ involves misrepresentation and fraud of various kinds, for
example: false promises of enrolment by fraudulent providers, false claims of
accreditation or licensing of providers and provision, the sale of educational materials
to support plagiarism, fake attendance records, and the sale of false degree
certificates, transcripts, diplomas and visas. Individuals use fake certificates and
other documentation to gain access to recognised programmes, financial aid and
employment. These fraudulent activities are supported by supply and demand and
represent a ‘black market’ in educational services and qualifications.

Providers that operate legally are seeking to protect students, their own reputations,
professions and employers from such misconduct. In many cases, they are seeking
‘quality assurance solutions’ to these problems from governments, agencies and
international bodies, for example by creating guidelines, codes of practice or
kitemarks. However, quality assurance arrangements by themselves are unlikely to
solve the problem as they are not strong enough without the force of law and law
enforcement agents to support implementation. Recent examples indicate this to be
the case (Greek, 2003) and we pick up this issue again in our discussion of current
quality assurance initiatives.

2.1 Development and Change in National Quality Assurance Systems

2.1.1 Expanding numbers of evaluation agencies

Recent publications by quality assurance membership organisations – the
International Network of Quality Assurance Agencies in Higher Education
(INQAAHE) and the European Network for Quality Assurance (ENQA) – reveal that
quality assurance is a growing activity. There are more quality assurance agencies
throughout the world than five years ago and the scope and focus of their activities
are being extended. The longest established external quality evaluation system,
which is in essence neither national nor one system, is the accreditation of
institutions and programmes in the US. This initiative was, and still is, controlled by
the higher education community, in contrast with the establishment of national
agencies and external quality evaluation systems elsewhere in recent times where
the initiative has mainly come from governments.
The INQAAHE Directory (2003) lists forty-seven countries from Albania to Vietnam with quality assurance agencies and provides details of more than seventy agencies in membership of the network. The ENQA report (2003), which overlaps significantly with INQAAHE, covers twenty-three countries and describes thirty-four agencies in the European Higher Education Area. But, the picture from these surveys is incomplete. As membership of INQAAHE is voluntary, less than 10% of the ninety or more recognised US accreditation agencies are listed in the INQAAHE Directory. There is no mention of the Central American Accreditation Council (CSUCA), an organisation operating across six countries in the region with a base in Guatemala. There is also little or no mention of existing agencies in the former Soviet republics such as the Ukraine or those in the South East Europe region. Therefore, the directories cannot as yet be relied upon as the definitive source on formal quality assurance arrangements in different countries.

What these publications do usefully demonstrate, however, is that it is not uncommon for there to be more than one agency operating at national level within a country and institutions, other providers and learners need to be aware of this. Further information on the development of quality assurance systems at national and regional level has recently been gathered within the UNESCO regional framework as part of the preparatory work for the ‘World Conference plus 5’ and for the meeting of the Global Forum on International Quality Assurance, Accreditation and the Recognition of Qualifications.

The drivers for the introduction of external evaluation (beyond satisfying the ‘traditional’ purposes of accountability and improvement) vary and depend on local, national and regional circumstances. The impact of borderless developments - as well as localised change - can be seen in these examples:

- a need to control the rapid growth of higher education provision which in many countries has, for lack of public funds, had to come from private providers (e.g. in Jordan, Poland and Malaysia);
- to support or legitimise new types of provision such as polytechnic type institutions and applied higher education studies (e.g. the Fachhochschulen in Austria) or new academic structures and qualifications (e.g. the introduction of two-cycle higher education studies in Germany);
- to contribute to the regulation and management of imported higher education services (e.g. the activities of the Hong Kong Council for Academic Awards in relation to advising on the registration of non-local higher and professional education provision).

It could also be argued that the existence of a national quality assurance agency is being seen as ‘a badge of maturity’ of a higher education system. Every government appears to want one even if there is barely sufficient critical mass in terms of the size of the national higher education sector to support a quality assurance system that is independent of an individual university.

2.1.2 Diversity of scope, focus and authority

Within countries, evaluation agencies operate at national and/or regional level: there are centralised, national systems and decentralised regional agency systems, depending on national political and legal structures. Often the ‘regions’ do not match or cover all political regions.
Some national agencies:

- cover all tertiary education providers (e.g. the QAA in the UK, the AUQA in Australia which also reviews state accreditation agencies);
- deal exclusively with either universities (e.g. ANECA in Spain) or non-university higher education institutions (e.g. HETAC in Ireland);
- deal only with private higher education provision (LAN in Malaysia);
- cover public institutions and programmes (NIAD Japan which works with national and local universities);
- only cover a single discipline or regulated profession, such as teacher training (e.g. INAFOP in Portugal);
- have compulsory external evaluation, often linked to funding and the formal recognition of qualifications for employment in the public sector;
- use accreditation or equivalent processes that are voluntary, but also have links to, or implications for funding. An example is the US recognition system where accreditation brings the possibility of accessing Federal Title IV funds for student loans, but where institutions are licensed by individual states, all of which have different criteria for granting authority to award degrees.

The size of the country and higher education system provides no common rationale for the nature of the quality assurance arrangements. The US has more than ninety autonomous accreditation agencies recognised by the US Department of Education and/or the Council for Higher Education Accreditation (CHEA). The new German system of accreditation appears on the surface to emulate the US model with an overarching body (Akk - the Akkreditierungsgrat) that recognises individual accreditation agencies, but there are significant differences. In Germany, accreditation covers only the new two-cycle undergraduate programmes and is compulsory. In the US, accreditation may cover institutions and/or programmes, (but only a range of programmes such as engineering), and is voluntary. While in many large countries and/or higher education systems, the institution tends to be the main focus for evaluation (e.g. the US, India, UK); in Germany it is currently only the programme of study.

Even when countries have similar social, economic and political backgrounds, such as the Nordic countries, there is little apparent convergence in quality assurance systems (Sm eb y and Stensaker, 1999). A recent project (ENQA 2002) between the agencies of Denmark (EVA) and Finland (FINHEEC) has however, explored the possibility of a mutual recognition process for agencies and set out a series of recommendations for a method of mutual recognition (ENQA, 2003). In other cases such as the Central American Agency, differences have been set aside as countries with a shared language have come together to establish a regional agency (CSUCA).

2.1.3 Responding to borderless developments and wider changes in higher education

Where national agencies have not previously existed, there are many developments in motion. Five years ago, Jordan was the only Arab state with an accreditation body dealing with new private institutions. In 2001, the Association of Arab Universities set up a Regional Committee for Assessment and Accreditation. One of the aims of the Committee was to create a culture in which assessment and evaluation were seen as necessities by higher education institutions. The committee has produced guidelines for the licensing and establishment of private higher education institutions and mechanisms for self-assessment and accreditation (UNESCO Follow-up to the World Conference on Higher education report on Arab region, 2003b).
At national level, countries including Algeria, Egypt, Lebanon, Morocco, Oman, Saudi Arabia, the United Arab Emirates, Yemen and the Palestinian Authority have established or are planning to establish accreditation and quality evaluation systems. What is interesting about some of these developments is that they include in the normal evaluation process aspects that are yet to be captured in many other countries with longer established systems. For example, the new licensing and accreditation guidelines for the United Arab Emirates incorporate a policy statement on, and standards for, distance learning. The draft guidelines for a new quality assurance system in Oman (with processes for both institutional and programme accreditation) incorporate a national qualifications’ framework describing qualifications not only in terms of credit points and years, but also in terms of learning outcomes. Emerging evaluation systems may be quicker than more established ones to address ‘borderless’ developments.

Where national quality assurance systems are not new, there is still change and innovation: new processes, standards and activities. Countries with well developed higher education systems such as Australia, the UK, Korea, India, New Zealand and Malaysia (for private education) continue to make changes or are undertaking major new initiatives, especially in relation to the quality assurance of transnational education. In Australia, the Australian Universities Quality Agency (AUQA) was established as a joint federal-state government initiative to undertake academic audits of universities and also to audit the state agencies that are responsible for the accreditation of private providers. In Thailand, the National Education Act of 1999, set in train an ambitious initiative intended to cover both the public and private higher education sectors with a requirement that all higher education institutions be evaluated every five years through the newly established Office of Education, Standards and Evaluation (UNESCO, 2003a).

No two national agencies are the same in terms of purpose, scope, focus, criteria or standards used. This diversity reflects the different national and regional contexts in which agencies operate and the constituencies they serve. Within the emerging European Higher Education Area, there have been several initiatives to try to negotiate and develop common terminology and criteria as external (and international) reference points for academic quality and academic standards. Outcomes to date include the development of ‘generic’ descriptors for qualifications at Bachelor and Masters’ degree level (the ‘Dublin’ descriptors5) and subject specific competencies at Bachelors’ level for a range of disciplines (the Tuning project6). It appears that the Dublin descriptors, with some customisation, have been incorporated into the standards of some of the agencies in Germany and the Netherlands.

Within the ENQA, there have been several projects to explore the utility of such shared standards and tools (an example of which is the Transnational European Evaluation Project7) and to explore methods for mutual recognition of agencies. A planned initiative for 2004 will be an exploration of the circumstances and context within which agencies operate to explore barriers to convergence. The project will be managed by the Comité National d’Évaluation (France) and the QAA (UK).

2.1.4 Towards criteria and standards: from input to outputs

As discussed earlier, definitions of ‘quality’ in higher education have tended either to be elusive or relative but this position is changing. For example, a survey of quality assurance in Europe suggested that quality was “as a rule interpreted in terms of the
extent to which the individual programmes achieve their own goals and the legal provisions under which they operate" (ENQA, 2003). This contrasted with the accreditation approach that determines whether or not the object of accreditation meets some external criteria and/or standards. In some agencies, there are attempts to shift accreditation criteria and standards from a focus on traditional 'input' standards to a focus on outcomes of student learning and achievement (completion rates, graduate first destinations and employment). A focus on outcomes will make it easier to accredit different kinds of provider and forms of provision, however and wherever delivered.

The development and use of explicit criteria, standards and external reference points is slowly emerging in other types of evaluation activities. The drivers for these changes include a need to address the quality assurance of new modes of learning and delivery such as distance learning, or transnational education and the need to provide clearer information about quality to a wide range of external stakeholders. The internationalisation of higher education is also a driver to move notions of standards and quality from opinions or assessment on an intuitive basis to a more transparent and consistent basis.

2.2 International Developments in Quality Assurance

As noted earlier, one of the trends in higher education is the increasing global activity of many higher education institutions. New kinds of provision also often include transnational elements and through collaborative arrangements, institutions are seeking to create joint degrees and international programmes. Quality assurance arrangements are responding in different ways to these international dimensions of higher education.

2.2.1 International members in governance and review processes

Some quality assurance agencies in smaller countries include members from outside the country on their Executive Board or Committees (e.g. HETAC and HKCAA), or have separate advisory committees with international members (e.g. HAC in Hungary). These members are asked to provide either a sounding board for new ideas or some kind of monitoring of comparability of standards and quality.

Other agencies, not necessarily in small countries, include non-national members in their evaluation or accreditation teams. There are many examples of this practice as a routine activity, for example, AUQA, the agencies in the Nordic region and in the Netherlands. However, these ‘international’ experts are not always included in the Agency’s regular training programmes and often appear to be used on a one off or ad hoc basis rather than being appointed for a fixed period or number of engagements. It is difficult, therefore, to conceive that international members can undertake benchmarking of an explicit nature between one system and another. Rather it increases the ‘pool’ of independent experts and may provide different (individual) perspectives on quality and standards. Other agencies have no specific requirement for ‘international’ experts to be included in their review teams. This tends to be the case in larger higher education systems such as the UK where the QAA publicly invites applications from individuals to participate in the selection, appointment and training process for membership of the pool of auditors and reviewers. There is no bar to international applications, but all reviewers have to undertake the training process.
2.2.2 Common processes and mechanisms?

Much of the interest in examining ‘convergence’ between national QA systems or in creating new international quality assurance systems is focusing on ‘methodology’. A growing (but potentially flawed) consensus seems to be that if the same process is followed, then the quality of higher education systems will also become comparable. Increasingly, the four-stage model of evaluation is promoted as good practice: establishing external criteria, self-evaluation of the object of assessment, a peer or expert review visit to the institution, programme or subject and production of a public report on the outcomes of the review.

Assuming comparability through common processes and mechanisms appears to ignore differences in criteria and standards, in expectations as to appropriate levels of student attainment and learning outcomes, definitions about what is (or is not) higher education, and differences in assessment regulations and practice. Also, a single model of good practice is unlikely to encompass the diversity of requirements and may also constrain necessary change and innovation. More seriously, emphasis is likely to be placed on the inappropriate things: structures rather than outcomes and the mechanics of processes rather than underlying principles for quality assurance practice such as transparency, consistency, fairness, equity and integrity.

2.2.3 The search for international standards

While the definition of standards, criteria and external quality reference points for education and qualifications is becoming a stronger focus at national level, there are also examples of the emergence of ‘international’ standards. This is particularly the case within the professions. National standards are also being used in the international domain. Such standards apply variously to programmes, qualifications, modes of study and to the activities of quality assurance and evaluation agencies themselves. The globalisation of business and industry has been a driving force for international standards such as the International Accounting Standards (IAS) and these standards will in turn have an impact on education and training (or re-training) in that subject area.

The search for international standards (and comparability across national standards) has brought in actors who are new to the higher education sector. These include the International Organisation for Standardisation (ISO) and the European Foundation for Quality Management (EFQM). An interesting aspect of these developments is that higher education institutions themselves have chosen to pursue international certification of their quality management systems such as ISO 9001 certification (e.g. institutions in Turkey and Singapore) and the EFQM excellence model (e.g. institutions in Germany and the UK). They may also choose to look for cross-sector certification in relation to their e-learning operations (OBHE, 2003c).

Some commentators may question the appropriateness of ‘industry’ standards for higher education. However, the certifying organisations have themselves demonstrated an interest in accommodating their standards for the public sector (as in the case of the EFQM communities of practice) or extending them to encompass new modes of learning. To date, no government or national agency has required higher education institutions to seek this type of external certification. However, growing interest from governments and institutions prompted ISO to convene an international workshop in Mexico in 2002 to begin the process of formulating ‘guidelines for the application of ISO 9001 to education’ (OBHEc, 2003, op cit).

Quality assurance agencies have shown some interest in external certification for their own activities with the AQU of Catalunya having achieved ISO 9001 certification,
and others such as the QAA in the UK and HAC in Hungary exploring the applicability of aspects of the EFQM model. As e-learning and blended learning become more prevalent we are also likely to see an increase in the demands from providers of qualifications that suppliers of associated services such as student support, admissions, etc are ‘industry certified’ as is common in industry supply chains. The British Association of Open Learning (BAOL) already supplies some such services to a small number of accredited institutions (OBHE, 2003c, op cit).

Meanwhile, the debate as to the quality assurance of the quality assurance agencies themselves has grown. Concerns that agencies are not accountable for their actions or activities and not subject to scrutiny has led to initiatives promoting the ‘meta-accreditation’ of quality assurance and accreditation agencies. The idea of ‘World Quality Labels and Registers’ has been floated, for example, by the International Association of University Presidents (IAUP, 2002). The most recent initiative comes from INQAAHE where a working party is developing ‘Principles for Quality Assurance Agencies’ along the lines of a code of good practice. These principles are currently subject to public comment.

2.3 Networking and benchmarking

There are a variety of examples of international co-operation in cross-border networks. Some of these are formalised and have been in existence for many years, for example, the ICDE, mentioned above, which publishes extensive guidelines for the quality assurance of distance and e-learning, and has recently established an International Standards Agency. Another, the European University Association’s (formerly the Conference of European Rectors) Institutional Evaluation Programme provides a training programme for reviewers and undertakes institutional reviews for a number of European institutions, on the invitation of the Rector. An independent evaluation of this programme has recently been undertaken. These networks are designed to share good practice and, in the words of the EUA, to ‘develop and spread a quality culture’ among institutions. Some recent examples go further still, for example, Universitas21 Global, a consortium of 16 universities from 10 countries has set up an independently operated body, U21 Pedagogica to ‘accredit’ all U21 global awards and may also market its quality assurance services more widely (OBHE, 2003c).

While the trend appears to be towards more and more varied forms of networks, we lack data on the impact of these arrangements on the quality of programmes and how they do, or do not, affect student choice. The extent of external stakeholder involvement is also unclear; and tensions may exist between the requirements of national systems and such international arrangements. Nonetheless, institutions are likely to reap benefits from staff mobility and the building of shared understandings of quality and standards.

2.3.1 National systems go international: following cross-border developments

As the delivery of national education across international borders becomes more common through distance learning, the establishment of branch campuses and partnerships, national quality assurance agencies using either standard or adapted processes have started to follow the trails of their domestic providers to destinations around the world. The major visible ‘exporters’ of education are the US, the UK and Australia. In the case of the two former countries, the quality assurance of several forms of transnational provision has for some time been subsumed within the
processes of the regular quality assurance and accreditation agencies (rather than being part of a separate agency).

In the case of the US, CHEA carried out a survey of the 78 CHEA and USDE recognised institutional and programmatic accreditors to establish the extent of their international activity (CHEA, 2002). Of the 53 responding organisations, some 29 indicated that they were operating internationally, accrediting 461 institutions and programs in 65 countries outside the US. Most of this activity by regional accreditors involved the review of US institutions operating abroad, whereas the specialised accreditors were more active in accrediting non-US programmes (see below for examples). The regional accreditation commissions tackle the quality review of international branch campus activity by their members in different ways. While all of them include such activity in their accreditation processes and standards, some visit all branch campus operations overseas as part of the re-accreditation of the ‘mother’ campus, others do not visit all overseas operations. In 2001, CHEA developed International Principles as a framework for US accreditors working internationally which invite accrediting organisations, amongst other matters, to communicate with the quality assurance agencies in countries in which they are working.

The Quality Assurance Agency for Higher Education in the UK has continued the practice of predecessor organisations of carrying out the quality audit of the overseas partnership links of UK higher education institutions through which UK degrees are awarded. The expectations concerning the standards of these qualifications are no different from national ones and the academic infrastructure of UK qualifications’ frameworks, subject benchmark statements and the Code of Practice for Quality Assurance apply equally to provision delivered outside the UK. More than 100 such audit visits have been made since 1997, and the reports of all of them are published. Section 2: Collaborative Provision, of the Agency’s Code of Practice (QAA, 1999b) focuses specifically on collaborative links, whether national or international and institutions’ adherence to the precepts in the Code is a focus of the overseas audit activity. It is a measure of how fast the international environment is changing that this section of the Code (approved in 1999) is currently under review and that this review is being carried out in parallel with that of the Guidelines for the Quality Assurance of Distance Learning.

Australia, the third major provider of ‘offshore’ education, is now moving towards introducing external quality assurance processes for its exported education through audits of provision on a country basis. These processes will be managed by the AUQA. Australia is the first of the major exporting nations to include ‘off-shore’ students in the number of registered international students, and recent figures (IDP Education Australia, 2003) indicate that a significant number of its international students are studying outside Australia (AVCC, 2001).

Information on the quality assurance of exported education from other countries such as Russia, Spain, Portugal and India in terms of standards, processes and outcomes, is less accessible at present. However, the pressure from international agencies, regional networks and governments for greater transparency, information and consumer protection in transnational education may encourage all exporting nations to monitor this type of provision.
2.4 Responses to importing transnational provision

The quality assurance of transnational provision is not simply an issue for exporting nations and institutions; it is also of interest and importance to importing countries. Transnational provision is therefore increasingly being regulated at the point of delivery by national authorities. Attitudes to the import of transnational education vary from cautious welcome for an increase in capacity, innovation and quality enhancement, to serious concerns about the undermining of national strategies and imperatives for higher education and about the quality of imported provision.

Many states have found that it is impossible to stop transnational education provision even where the qualifications are unrecognised by the legal authorities and where the students are well aware of this situation before undertaking the degree. For example, in Greece - for more than twenty years - there has been substantial imported education provision from other European countries and beyond. This is delivered mainly through partnerships with local private providers that cannot be recognised as part of the higher education community (as they charge fees). There are, however, countries (such as Malaysia) which have developed national strategies to use local private and imported higher education to increase the size of the local higher education sector and expand access to higher education within the context of constrained public funding. This has been matched by the introduction of enabling legislation and procedures for the licensing and accreditation of private providers by the National Accreditation Board (LAN).

In Singapore, there is a mixture of entrepreneurial and individual initiatives (either local or foreign) and some specific import invited by the Government. The government’s strategy is to encourage prestigious universities from the United States and Europe to establish branch campuses and create partnership links with local universities (Observatory Breaking News 2003b). Within the last year, both China and India have announced decisions to encourage more private and imported transnational provision, in part to enhance national capacity (Observatory Breaking News 2003b). It is interesting to note that while the largest, ‘public’ market for transnational education is Asia Pacific, the strongest critics of transnational education are elsewhere, for example, in Europe and Latin America.

Transnational education in Europe has been the focus of three recent studies funded by the European Commission looking at provision in Western Europe, Central and Eastern Europe and in lifelong learning (Adam, 2001, 2003; ACA, 2002). The results of the first two studies produced an interesting contrast in attitudes and findings in relation to transnational education. Western European institutions in France, Spain, Portugal and the UK were more likely to be exporters than their counterparts in Central and Eastern Europe where the import of education, primarily, though not exclusively, from the UK and US was common. However, in many of the countries in Central and Eastern Europe there was less ‘fear’ of transnational education than is evidenced in Western Europe where there is, as yet, less ‘visible’ import.

Other major importing countries include SAR Hong Kong where there are Ordinances for the registration of non-local provision. Different standards of recognition can apply: where foreign programmes are registered the qualification must be comparable in standards to the country of origin; for accreditation, the standards of non-local provision must be comparable to those of SAR Hong Kong qualifications. This process is managed by the local quality assurance agency, the HKCAA, and lists of recognised and exempted programmes (those which are offered in partnership with a local provider) are published by the Ministry11. HKCAA publishes
list of accredited postsecondary courses\textsuperscript{12}. This approach illustrates a solution to one of the dilemmas about transnational education – is it a part of the local higher education provision or should it be recognised as something foreign and different and offering an opportunity for a different kind of experience? However, the approach does not address the apparent contradiction about valuing the standards of foreign qualifications gained abroad over foreign ones gained at home, particularly where they are meant to be comparable.

2.4.1 Concerns and complaints

Serious concerns have been expressed about the nature and impact of transnational education in several countries and regions, notably parts of Africa and Central and Eastern Europe (CEE) (HEQC, 2000; Adam, 2003). The reasons underlying expressed concerns differ, for example:

- There is a lack of capacity and resources in many countries for strategic planning and the implementation of legislation to regulate imported educational provision.
- There has been an explosive growth of indigenous private provision and this may be associated or confused with foreign provision (Adam, 2003).
- Fragmented national regulatory frameworks may inhibit local capacity to regulate transnational provision.
- Bureaucratic, state-led programme accreditation systems may not be capable of adapting to more flexible delivery methods in either national or transnational education (Adam 2003).
- Quality and standards are often perceived to be lower in transnational or for-profit provision than in public, national provision.
- Imported transnational education provision may focus on a relatively narrow range of subject areas which are ‘cheap’ and profitable to offer such as information sciences and technologies or business and management; this may lead to over-provision in certain fields at the expense of others. In South Africa, this prompted the Minister of Education to request the national quality assurance agency, the HEQC, to undertake an exercise to accredit all MBA programmes operating in the country, foreign and local, public and private.
- The subject material delivered in transnational education programmes is not always pertinent to national needs or contexts.

In relation to many of these concerns and complaints, there is an urgent need for empirical data to understand more fully the nature of the concerns, to explore the reality on the ground in different countries and to examine the issue from the perspective of different stakeholders. For example, the popularity of certain subjects (such as business studies) is not unique to imported transnational education. Such popularity is reflected in similar patterns of demand in many exporting countries since learners are deciding for themselves what is relevant in terms of subjects and qualifications for their personal development and career. Also, the lack of tailoring of subject material to the local context may indeed reflect cultural insensitivity on the part of the provider or a lack of attention to curriculum relevance. However, it may also reflect a deliberate aim to offer an international programme, or a deliberate choice on the part of students (or parents or employers) to choose an international programme that is more market-oriented, with a potential for enhanced employment opportunities. In particular, we need to examine the motives and experience of learners who are engaged with a variety of borderless provision so that we can understand better the value and quality of such provision. At present, these ‘new learners’ have no unified voice or representation, in comparison with traditional
students and their unions, and although some individual providers are tracking alumni, there do not appear to be many comprehensive studies available.

Finally, a new but increasing dimension to the import of education is ‘import for export’. For example, countries such as Singapore and Malaysia import education and encourage the recruitment of international students to such provision. This leads to interesting challenges around responsibility for, and ownership of, standards and quality and a need to revise understandings about who are the exporters, who are the importers, who are the students and what does ‘relevance’ of studies mean in such contexts?

2.4.2 Status and recognition of transnational education

Accessing reliable and easily understood information about the recognition and status of transnational education providers and the qualifications they offer is a growing problem. This is both a case of needing more information and better access to existing information. The major exporters have lists of their recognised higher education institutions available either through government websites (DfES, UK and CRICOS, Australia) or in the case of the US of accredited institutions and programmes through the directories of members of USDE and CHEA recognised accreditation commissions. These lists are in the public domain, but it is not clear that the public necessarily knows how to access them or can understand the consequences and implications of ‘recognition and approval’ (or lack of either).

In many importing countries, the regulations for licensing and recognition are complex, subject to interpretation and change, and although some lists of approved transnational education providers are available, they are not always easily accessible. At present, because of the complexities involved, quality assurance arrangements by themselves offer insufficient insight and protection and because of this, interested parties also fall back on ‘reputation’ or other familiar sign-posting. In practice, ‘assurance of quality’ often rests on a mix of formal and informal processes. One may either be ‘a reputable foreign provider with internationally recognised (marketable) degrees and qualifications’ or a provider of degrees that are recognised or accredited as part of the national host system. There are providers, legitimate and otherwise, that do not fall into these categories and this remains a challenge for the quality assurance of transnational education.

Attempts have been made to develop international codes for assuring the quality of transnational education. An example is the Code of Good Practice in the Provision of Transnational Education, developed by the Council of Europe and UNESCO-CEPES, and approved within the framework of the Lisbon Convention on the recognition of qualifications13. However, as with many international initiatives, without any monitoring of its implementation and use, it remains a series of good intentions and exhortations with no indication as to its effectiveness - as was found in the recent survey of transnational education in Central and Eastern Europe (Adam, 2003). Also, the pace of change and the blurring between imported and exported education in some systems makes it more challenging to define import and export and potentially reduces the ‘shelf-life’ of codes unless they are regularly reviewed and updated.

Other initiatives to secure good practice and exchange information on matters of mutual interest in transnational education include the emergence of bilateral co-operation agreements between quality assurance agencies. Examples include an agreement between the QAA (UK) and the LAN (Malaysia) and emerging co-
operation between quality assurance agencies and authorities with responsibilities for
the recognition of foreign qualifications.

2.4.3 At a distance – old challenges and new applications

The activities of national quality assurance agencies also increasingly cover distance
learning, the delivery of which may cross national borders. National debates on the
extent to which this activity requires specialist quality assurance agencies and
separate standards and criteria remain unresolved. This may in part reflect the
degree of integration – or not – of distance learning activity in traditional institutions
and quality assurance processes and the changing nature of distance learning itself.
In some countries, separate distance learning universities were never created since
traditional institutions offered their programmes in dual-mode (e.g. Australia, Sweden
and Finland). In other countries separate (often very large) open or distance learning
universities were created as an integrated part of the national higher education sector
(e.g. Open University in the UK, UNED in Spain). These institutions are subject to
the same quality assurance processes as ‘traditional’ institutions. However, this fact
has often not been enough to convince authorities abroad, where distance learning
was either non-existent or at a low level, to recognise qualifications gained through
distance learning, whether within their territories or not.

A recent report on the implications of transnational education in Central and Eastern
Europe observed that, ‘there is evidence that some CEE states maintain a strong
distrust of open and distance education as a matter of principle’ (Adam, 2003). This
has also been the case in other regions of the world such as the Arab states where
until recently there has been no indigenous distance learning provision. As the use
of flexible patterns of learning in transnational education has become more common,
particularly where such provision is targeted at working adults and professionals,
these attitudes create problems and concerns about quality and standards which are
difficult to resolve through reassurances about quality assurance processes.
However, the development of indigenous distance learning provision (such as the
establishment of the Arab Open University) may do more to foster a climate of
confidence in open and distance learning in general by offering concrete standards
and criteria against which the quality of imported transnational provision can be
compared, rather than being rejected out of hand.

Distance education is a mode of provision where there appears to be increasing
competition between quality assurance providers, national, international and industry-
based, to develop standards and processes. This may reflect expansion in this kind
of provision across sectors and countries. The US, for example, has over the past
three years seen huge growth in the number of distance learning programmes and
student enrolments on them. The recent report of the National Centre for Education
Statistics (2000/01) noted that there had been a 110% increase in the number of
students enrolled on US distance learning programmes and distance education
students in the US now represent 19% of all enrolled students.

The growth of distance learning has had an impact on domestic quality assurance
standards and criteria and has in some instances been a catalyst for co-operation
between agencies. For example, in 2001 the regional accrediting commissions in the
US published a ‘Statement of Commitment for the Evaluation of Electronically
Offered Degree and Certificate Programs’ and ‘Best Practices for Electronically
Offered Degree and Certificate Programs’. They were seeking to adopt a common
platform for the review of distance learning (CHEA 2002a). Despite such moves
towards consistency of principles and practice, the nine national US accreditors have
independently developed standards for distance learning which in some cases make additional requirements. Some of these standards are new, others are supplemental. Other accreditors use the same standards for review of distance learning as for site-based education.

In the UK, a range of organisations have emerged to promulgate standards and criteria in respect of Open and Distance Learning, but none has to date had statutory recognition or regulatory authority. This may change in the future; for example, the British Standards Institute has recently published a British Standard for the use of information technology in the delivery of assessments (BS7988) and has released for comment a draft code of practice for e support in e-learning systems (BS8426)\(^1\). In higher education, the Quality Assurance Agency has reviewed distance learning provision by UK higher education institutions within the UK at institutional and subject level as part of its regular activities. It has also undertaken a specific overseas audit to look at UK distance learning provision in Hong Kong. In 1999, the QAA issued Guidelines on the Quality Assurance of Distance Learning. These are now under review with the intention that they become incorporated into the Code of Practice on Quality Assurance.

As we have seen above, it is often the case that novel forms of provision (such as e-learning) are initially deemed to be specialist, requiring separate standards, criteria and regulators. Subsequently, as they become subsumed within traditional higher education provision, they are included in ‘normal’ quality assurance processes whose standards and criteria are adapted accordingly. Additionally, where common ground is found across sectors, institutions may choose to ‘double badge’ or there may be convergence between ‘industry-based’ and ‘higher education-based’ standards. We remain at the stage where there is a diversity of approaches and agencies.

2.4.4 International accreditation by national agencies

As mentioned above, some of the regional US accreditation commissions operate outside the US and accredit non-US institutions. Most of these institutions are ‘international’ or effectively stateless as they are not part of the higher education system where they are located (e.g. Deree College in Greece or the American University in Bulgaria). Such institutions often, but not always, recruit a majority of international rather than local students. For many of these institutions this is the only opportunity available to them for recognition. Some could not be accredited or recognised locally because they are private, or because they wish to offer different educational experiences from the local pattern. Others consider themselves international, so local accreditation would not be appropriate. These institutions have few opportunities open to them for international benchmarking and potentially wider recognition.

To date only three of the six regional commissions in the US undertake such transnational activities. Activities are demand-led and there has been debate amongst the regional commissions as to whether individual commissions should be thus engaged, or whether there should be a joint initiative in the international review of institutions whereby the regional commissions would work together to review ‘American-style’ institutions outside the US (CHEA, 2002). The aim would be to achieve a consistency of approach and to remove the possibility of commissions being played off against each other.
The Department for Education and Skills in the UK does not give advice on overseas institutions operating outside the UK and states that overseas higher education institutions operating in the UK are subject to the quality assurance mechanisms of their own country as well as the provisions of the Education Reform Act (1988) concerning UK university title and degree awarding powers. The Further and Higher Education Act (1992) established four funding bodies in England, Scotland, Wales and Northern Ireland. These Funding Councils have statutory responsibility for ensuring the quality of education is assessed in the institutions they fund. Since 1997, the QAA (UK) has through contracts with the Funding Councils carried out the external evaluation of this funded provision and also of other institutions with UK degree awarding powers. The Agency is constrained by its current Articles from operating outside the UK except for carrying out the audit of UK higher education institutions’ overseas links and partnerships through which UK higher education qualifications are awarded. However, many UK professional and regulatory bodies are very active in validating and accrediting programmes around the world.

At programme level there is extensive cross-border accreditation and recognition, carried out mainly by US specialist accreditors and by UK professional and regulatory bodies such as the Royal Institute of British Architects and the Royal Institute of Chartered Surveyors. This international activity represents a significant proportion of the work of some of these organisations as they may be recognising more programmes outside their national border than within. Typically, they are invited to accredit programmes in countries where local provision in the subject/profession is relatively limited, thus creating difficulties for independent external evaluation or benchmarking. Several of the programmes recognised by the UK organisations are in Latin America.

2.5 Co-operation and competition in internationalising professional accreditation

At professional or subject level, international co-operation (particularly in research) is long standing. Emerging co-operation in the accreditation and quality assurance of higher education programmes in subjects such as engineering has supported the mobility of students and qualified professionals and offered opportunities for the benchmarking of programmes and institutions. But professions or disciplines appear to be taking different approaches to the internationalisation of quality assurance.

2.5.1 The cooperative engineers?

An oft-quoted example of co-operation in international quality assurance and the mutual recognition of qualifications is the Washington Accord. The Accord was established in 1989 and is an agreement between the engineering quality assurance organisations of several nations. It recognises the substantial equivalency of programmes accredited by those organisations and recommends that the graduates of accredited (undergraduate) programmes in any of the signatory countries be recognised by the other countries as having met the academic requirements for entry into the practice of engineering. The current signatories are from Australia, Canada, Hong Kong, Ireland, New Zealand, South Africa, the United Kingdom and the US, with Japan as a provisional member. The agreement applies only to accreditation conducted by the signatories within their respective national or territorial boundaries. The signatories are not bound to recognise programmes accredited or recognised as substantially equivalent by other signatories outside their national boundaries, so some types of transnational education appear to be excluded from the process. While individual universities are not signatories to the Accord, their graduates may benefit from it.
A provisional member of the Accord must demonstrate that the accreditation system for which it has responsibility 'appears to be conceptually similar to those of the other signatories’. By conferring provisional status, the signatories indicate that they consider the provisional signatory has the potential capability to reach a full signatory status, but there is no guarantee that this will be granted. All members have to undergo a review process. In June 2003, provisional membership status was granted to Germany, Malaysia and Singapore through three organisations: the Accreditation Agency for Study Programs in Engineering, Informatics, Natural Sciences and Mathematics, Germany; the Engineering Accreditation Council of Malaysia; and the Institution of Engineers, Singapore.

The Accord does not appear to prevent signatory organisations from offering separate 'benchmarking' type activities such as 'substantial equivalency' by ABET and programme accreditation by the Engineering Council in the UK. These opportunities are most frequently taken up either by institutions in small countries with few or no national comparators and no national external quality assurance or occasionally, it would appear, by institutions seeking an 'international' label for their programmes.

2.6 The competitive (and overlapping) world of accreditation in Business and Management

In contrast to the engineers, the accreditation activity in the domain of business and management appears to be a more competitive phenomenon with AACSB International, AMBA, FIBAA (which competes in Germany with three regional agencies) and EQUIS (EFMD) emerging as contenders for the title 'international accreditors'.

- **AACSB International** – the Association to Advance Collegiate Schools of Business17 - is a US-based accrediting agency for bachelors, masters and doctoral degree programs in business administration and accounting which is recognised by the USDE and CHEA. The Association accredits 406 institutions in the United States. Since 2001 it has ‘eagerly sought outreach activities to globalise the Association and its services’ and now accredits more than forty institutions in 19 countries outside the US.

- **AMBA** – the Association of MBAs - is an independent accreditation body based in the UK that assesses the quality of MBA programmes. It is also a membership organisation for students and graduates of accredited programmes around the world. The Association currently accredits programmes in 18 countries outside the UK.

- **FIBAA** – the Foundation for International Business Administration Accreditation - is based in Germany and is accredited by the AKK. It accredits programmes delivered in institutions in Austria, Germany and Switzerland. In common with the other accreditors, it has tackled the accreditation of new providers such as international institutions. It is not competing in the wider market place, but has ‘competition’ within Germany as some of the regional German agencies (ZevA, ACQUAS, AQUIN) are also accrediting MBA programmes. This may account for the small representation of German institutions in the lists of the other international accreditors.

- **EQUIS** – the European Quality Improvement System - was launched in 1997 by the European Foundation for Management Development (EFMD), based in
Brussels. EQUIS accredits globally, with 65 Business Schools now accredited in five continents. It has no ‘national’ base, does not seek to replace national quality assurance systems and is not based on any particular educational model. It could be argued that this is the most international of all these organisations.

The origins of the organisations are different and indeed they have different focuses, some accrediting institutions and others programmes. In addition, some have formal recognition within national systems of higher education whereas others have ‘practitioner’ recognition within their community. All appear to be comfortable with accrediting and recognising new modes of provision, distance learning, transnational delivery, branch campuses and partnership arrangements, and new providers. EFMD has recently established a pilot project, ‘CLIP’, to evaluate the provision offered by ‘corporate’ universities with Allianz being the first to undergo the process, which closely mirrors the EQUIS procedures. In this subject area, innovation and difference appear not to be feared as threats to quality and standards.

While these approaches to internationalisation have obvious benefits, there are also some potential concerns. Is such an approach becoming a club for the wealthy? In 2002, AACSB International and EFMD signed a Strategic Relations agreement, but this did not appear to have any bearing on the ‘competition’ - real or unintended - between the organisations. The phenomenon of ‘multiple accreditation’ is becoming a reality in this world, with several institutions either double or triple ‘badged’. Canadian, Dutch, French, Spanish and UK Business Schools are the most prevalent holders of multiple accreditation. In some countries this would be in addition to the usual national quality assurance and recognition processes.

The cost of undertaking such international accreditation is beyond the reach of institutions in many parts of the world, thus excluding them from the perceived competitive advantage of international labels. In addition, other institutions who see their mission as being more to serve local, regional or national communities may miss out on the ‘perceived’ excellence attributed to the possession of an international label because the focus of their activities may not meet the requirements and criteria of these international accreditors. And finally, there is a potential for confusion as incorrect inferences are drawn from the labels. Accreditation by the AACSB International, for example, gives an assurance of having met a ‘threshold standard’ as defined in the US context (CHEA, 2002) but in the international market the label appears to be taken as a badge of excellence.

2.7 Quality assurance information and sources: ranking and labels

The introduction of performance indicators in many national systems of education throughout the world has provided opportunities for new commentators to enter the arena, notably the media. They provide additional information for consumers in the form of increasing numbers of surveys, rankings and ‘guides’ to higher education and qualifications. These commentators include local and national press, such as The Times in the UK, Die Stern in Germany and McLean’s Magazine in Canada. Such commentaries and rankings have in some cases gone international, especially in relation to business schools, with The Economist, Business Week and the Financial Times all publishing their rankings of ‘the 100 best’. These rankings appear to be taken very seriously by institutions and students alike and often feature in recruitment literature along with accreditation and other quality assurance findings. As observed in the report of an UNESCO-CEPES roundtable, “the proliferation of ranking systems is not surprising. With the massification of higher education round the
globe, there is an increasing appetite for this kind of independent information. The private sector has responded to this demand appetite, with apparent commercial success, since, without a consumer market, the rankings could not be published" (UNESCO-CEPES, 2002).

In Germany, a variation on the hard copy publications is a web-based ‘ranking’ based on the experiences of students which is intended to inform the decisions of students intending to study in Germany. It covers 242 German higher education institutions and the 34 most popular subject areas and represents a co-operation between the DAAD/CHE and Stern.

There is also a proliferation of ‘directories’ and international guides (e.g. DICES 2003) which provide information variously on international study, distance learning etc. It is sometimes necessary to be cautious about the information contained in these publications since their independence is not always apparent. Some are financed by the institutions featured in them – so are in fact ‘promotional’ – and several appear not to be very clear as to the criteria for inclusion of material.

2.7.1 Trade in Education Services

The current debate on trade in education services within the current (Doha) round of negotiations in the WTO’s General Agreement on Trade in Services (GATS) is contentious and polarised. But one issue common to all parties, whether for or against liberalising trade in education services, is interest in and concern about the quality of education. A consequence of this has been to bring even more actors into the already crowded arena of quality assurance in higher education. A range of inter-governmental and non-governmental organisations, some of which have no legal competence in, or experience of, managing quality assurance in higher education have entered the field. Their activities range from commenting on quality assurance to potentially regulating aspects of it through international conventions and codes of practice.

Different organisations play different roles:

- UNESCO, through its Global Forum on International Quality Assurance, Accreditation and the Recognition of Qualifications, is promoting the development of principles of good practice in cross-border education, national capacity building in quality assurance and the modernising of regional conventions on the recognition of qualifications. UNESCO has therefore both a formal, quasi-regulatory role (through its international scope and its governmental membership) and a less formal, guidance, capacity-building and information role.
- The OECD is aiming to be the ‘bridge’ between the world of trade and education, improving communication and understanding and providing data about trends in trade in education and new forms of learning.
- The WTO has an interest in the role of quality assurance as a support or an impediment to trade in educational services.

None of these organisations actually has responsibility for or carries out quality assurance activities. Nonetheless they provide international forums for the variety of stakeholders to raise and debate concerns about trade in educational services, the impact of new forms of provision and the activities of providers, legitimate or fraudulent. While the debates and the sharing of information and practice are valuable, there is also considerable potential for duplication of activities and for the promulgation of contradictory findings by the ‘talkers’ and ‘thinkers’ as to the right
direction to take in international quality assurance. Establishing appropriate action for the future requires parallel and linked co-operation between the players and must ensure that the ‘doers’ are firmly on-board.

Within the separate arena of regional and bilateral free trade agreements, arrangements are increasingly being made concerning the mutual recognition of qualifications and for co-operation in accreditation. An example of this is within MERCOSUR, created by the Treaty of Asuncion in 1991, a grouping comprising Argentina, Brazil, Paraguay, Chile and Uruguay. A regional technical committee is to be created to serve as a forum to resolve differences between member states about accreditation and recognition and to establish equivalence of degrees and certificates between educational systems (CHEA 2002b). Given such developments, it is increasingly important for close co-operation to occur between quality assurance agencies and those with a remit to recognise qualifications. It is also essential to ensure the exchange of information between Ministries of trade and education. In due course, just as ‘borderless education’ is witness to convergence across educational boundaries, so these same developments may drive convergence across agencies and government departments.

2.8 Tackling deception and fraud in higher education – whose responsibility is it?

There are many calls for the international regulation of higher education - especially transnational education - by a supra-national body. But no matter what quality assurance systems are introduced at national or international level, they alone cannot tackle issues of fraud, corruption and deception which are becoming an increasing problem, especially in relation to the proliferation of Internet based institutions and accreditation bodies. The difficulty of tackling these issues is compounded by the fact that it is not always the case that ‘consumers’ (learners) are the victims of such diploma and accreditation mills. For example, earlier this year, the BBC reported on the culmination of four years co-operation between trade officials in the UK and the US that led to the demise of a chain of diploma mills operating on the Internet with activities from Israel to Romania to the UK and the US. It was observed that “the people sending out the e-mails were not conning anyone. These people who bought the degrees knew exactly what they were doing. The complaints received were actually from colleagues of those who got jobs by lying”19. By moving from jurisdiction to jurisdiction, obeying the letter of the law but denying the spirit of the law, clever operators can, as in the reported case, make millions of dollars and by all accounts have ‘satisfied’ customers. The ‘trade in qualifications’ as opposed to education is a booming one as is the emergence of the academic flags of convenience in the form of governments who are apparently willing to lend credibility to sundry dubious diploma mills. (Contreras, 2003).

National authorities and quality assurance and accreditation agencies can contribute to consumer protection by publishing easily accessible lists of recognised institutions and/or programmes and by providing advice to would-be learners. Examples include the CHEA Facts sheets containing ‘12 Important Questions About External Quality Review’ and ‘Important Questions about ‘Diploma Mills and Accreditation Mills’. Another example, recently published by OECD, is the ‘Guidelines for Protecting Consumers from Fraudulent and Deceptive Commercial Practices Across Borders’. Such guidance is useful and necessary, but there is a limit to what can be achieved through information alone or through the awarding of ‘quality labels’ for quality assurance and accreditation agencies, as advocated in some circles. Legal instruments and legal powers to implement them are required, with common interpretations of the law. It may be that the WTO will in due course provide a route
to stronger consumer and stakeholder confidence and protection, if supported by revised national regulatory frameworks, new quality assurance arrangements and international agreements and conventions.

3.1 Trends and Issues

It is not straightforward to establish clear trends in a field where much is changing or under development and where developments vary by country, region and sector. Nonetheless, we offer a provisional summary of trends and issues, based on the overview of debate and activity described above.

At national level, there is growth in the number of agencies, networks and initiatives focused on quality assurance and much of this growth is linked to developments in borderless higher education. The scope and focus of the work undertaken by evaluation agencies are expanding and diversifying, albeit at different paces in different countries and regions. In relation to new agencies, it is noteworthy that some have been established with a comprehensive range of functions in relation to quality assurance and the recognition of qualifications (e.g. Sweden's Högskoleverket and the Centre for Quality Assessment in Higher Education Lithuania). Others are comprehensive in dealing with the evaluation of all levels of education from kindergarten to university (e.g. the EVA in Denmark) or all types of provider and provision. In addition, as examples from the Arab region illustrate, new agencies may be quicker or better able to respond to new developments than existing agencies.

The purposes and agendas of existing national agencies are also evolving from traditional emphases on quality improvement and accountability to wider responsibilities for the provision and dissemination of information on programmes and institutions to the wider public and to government. The provision of expert opinions and advice to governments and institutions is increasingly significant; in some cases this also involves investigating and even deciding on legal matters relating to higher education institutions (e.g. ENQA and INQAAHE publications). Given some of the concerns raised in relation to transnational and for-profit education and the growing problem of fraud and deception, one can expect this trend to continue. National agencies are also, of course, refining their quality assurance approaches in the light of their experiences of evaluation and as a result of the sharing of practice across agencies, as well as in response to wider changes in higher education and society. The growth in popularity of ‘accreditation’, especially in Europe, may be part of such evolutionary change.

There is increasing pressure (in countries and regions) for ‘convergence’ of quality assurance systems, criteria and approaches. A number of different types of initiatives are in train to promote convergence, mutual co-operation and understanding. These include the development of similar or common external reference points such as qualification frameworks; work on glossaries and typologies that address problems of terminology; attempts at convergence of methodologies and efforts to bring quality assurance and the recognition of qualifications closer together, at national and international levels. Several of these initiatives are visible in the emerging European Higher Education Area.

Two common approaches to the fostering of mutual understanding and exchange of information that provide a potential for convergence are networking and benchmarking, both of which are much in evidence.
3.2 Networking

There is an apparent increase in networking and co-operation in quality assurance and enhancement activities:

- between governments through free trade agreements and agreements on the mutual recognition of qualifications;
- between quality assurance agencies at international level (INQAAHE) and through bilateral mutual recognition and co-operation agreements;
- between universities through associations such as EUA and its institutional review process and other thematic networks;
- by the professions (e.g. the Washington Accord);
- by agencies such as UNESCO that aim to create a forum for dialogue both across countries and between the variety of stakeholders concerned with quality in education.

3.3 Benchmarking

Benchmarking is increasingly referred to as a purpose of evaluation, and some agencies in smaller countries or regions in Europe have tended to mention this as a core activity (e.g. FINHEEC). It is being used as a tool for self-evaluation and improvement, helping institutions and/or systems to monitor performance on a range of dimensions, and to compare performance either with the past or with that of others with similar characteristics. An example of benchmarking in a large system is its use by the NAAC in India where a five-stage process has been developed at institutional level. This involves: setting the platform; choosing the appropriate benchmarking activity; identifying the aspects to be benchmarked; fixing the norms and indicators; and, applying the benchmarks (Stella, 2001). Consortia of institutions such as Universitas21 are also using benchmarking as an instrument for quality assurance, and individual institutions, particularly from smaller countries or those with less mature national quality assurance systems, are using accreditation and validation services from other countries to benchmark their quality and standards.

It is clear that the international dimensions of higher education are creating a need for international initiatives and action. Once again, a diversity of approaches is in train. For example:

- National agencies are going international and 'international' agencies are emerging in accreditation, if only, as yet, in certain fields;
- The development of regional and international subject or profession-based quality assurance and accreditation organisations;
- The use of international industry standards;
- Exporting and importing countries are both developing regulations and quality assurance arrangements;
- Some regions are actively seeking mutual co-operation or convergence in quality assurance arrangements.

The growth of new forms of learning and the emergence of new providers are prompting a range of work on developing instruments to assure and evaluate the quality of different modes of provision such as 'e-learning' and 'blended learning' and to monitor the activities of new providers. But what is 'new' varies from country to country and over time. Novelty and innovation also provoke a range of reactions – initially a call for increased and new regulation – and over time, often, the absorption of innovative practice into existing regulations and quality assurance practice. As discussed, there are also a variety of concerns being raised about borderless
developments. There is a potential here for both legitimate and fraudulent developments to be tarred by the same brush. In order to take appropriate action, national and international agencies and governments require good data on which to base their decisions and target their actions.

Expansion and change in higher education and the associated complexities involved (including those associated with the quality assurance world) are prompting calls for more and better information for all stakeholders. There appears to be growth in the range and sources of information about quality and standards (such as the media) and the use of such data as well as other ‘labels’ for promotional and branding purposes by institutions. Also, the provision of more and better information about judgements made by agencies is prompting debates about changes to the nature of judgements, questions about rankings, pressure for routine publication of evaluation reports and efforts to improve the language of quality.

4 Conclusion

Our review of the domain of quality assurance in this increasingly borderless terrain leads us to some conclusions both about future directions and some unresolved issues.

First, there is no apparent steady state in quality assurance at national level. This may mitigate against any comprehensive international agreement on quality and standards beyond necessary agreements on general principles or values and standards that should be applied to the activity of quality assurance. The focus on convergence of methodology or processes as an indicator of comparability of quality and standards can be misleading.

Second, both the frameworks and outcomes from quality assurance appear to be strengthening through the development of new performance indicators, benchmarking processes and agreed reference points for quality and standards such as frameworks of qualifications, output standards and criteria that focus on students’ learning attainments. Progress is very uneven, but such instruments may provide greater transparency at national level which in turn may facilitate international understanding, mobility and the recognition of qualifications.

Third, the development of ‘international accreditation’ has brought about a new ‘access’ issue. The cost of seeking recognition by non-national accreditation and ‘international quality labels’ may exclude institutions in developing countries from achieving international recognition. Also, a lack of national accreditation agencies especially at subject level may preclude involvement in international systems such as the Washington Accord. International agreement on quality and standards may be easier to achieve when the focus is narrower, the constituents fewer, and the common interest greater (e.g. in certain professions where mobility is common). This is potentially more likely to lead to co-operation and collaboration. However, where there is no shared professional corpus, the incentive for co-operation may be less and the scope for competition greater.

Fourth, inter-institutional benchmarking and quality assurance arrangements may be valuable for the institutions involved, but it is unclear how the wider interests of students, potential students and external stakeholders are met. Given the ever-increasing demand for information about quality and standards, such arrangements are not likely to be regarded as sufficient to meet requirements for accessible public information.
Fifth, universities and other individual providers of transnational education do not and cannot know what is the cumulative or aggregated impact of their individual actions and presence in another higher education system. This does not, of course, exonerate them from doing their own ‘triple bottom-line’ impact assessment and reporting in relation to the social, economic and environmental impact of their actions wherever they operate. However, it is only the importing country that can make an overall assessment and judgement on the impact and relevance of transnational provision for meeting national needs. Where regulations for imported education are being developed, there needs to be clearer information as to what these are, how they apply, what the outcomes are and what levels of confidence can be assumed by their enactment.

Sixth, the quality assurance of transnational education may in certain circumstances be less of a pressing issue than the control of indigenous private provision. Indeed the two are often confused, especially where local institutions are operating with foreign sounding names. There are promising signs that some of the providers of transnational education are increasingly aware of their responsibilities and that competition between them and indigenous providers will increase, not diminish, their national quality assurance efforts in relation to exported education. While international codes have their place, without some kind of monitoring of adherence and implementation, they will not be as effective instruments of quality assurance as the review and evaluation activities carried out by national agencies.

Seventh, quality assurance agencies and recognition authorities cannot be the ‘Academic Interpol’ when it comes to matters of international fraud, corruption and deception. There are two aspects to this. As discussed earlier, ‘quality and standards’ are at least in part, socially and culturally constructed and politically framed. Through regulatory arrangements, the activities of formal agencies and the actions of institutions, they tend to reflect the presence or absence of wider standards of integrity and probity in public life. Quality assurance arrangements can therefore be weak or strong, depending on context and more or less able to cope with fraud, deception or corruption. The second point is that new forms of fraud and deception go beyond the academic quality and standards remit of most agencies and institutions into arenas of trade, crime, immigration and employment. These are not areas that academic quality assurance alone can address or resolve, whether national, regional or international.
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End Notes

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