

EUROPEAN ECONOMIC AREA
STANDING COMMITTEE
OF THE EFTA STATES

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SUBCOMMITTEE IV ON FLANKING AND HORIZONTAL POLICIES

**EEA EFTA COMMENTS ON THE PROPOSAL FOR A RECOMMENDATION
OF THE COUNCIL AND OF THE EUROPEAN PARLIAMENT ON FURTHER
EUROPEAN CO-OPERATION IN QUALITY ASSURANCE IN HIGHER
EDUCATION (COM (2004) 642)**

I INTRODUCTION

1. The EEA EFTA states have received the report from the European Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions regarding the implementation of Council Recommendation 98/561/EC of 24 September 1998 on European co-operation in quality assurance in higher education, as well as the proposal for a Recommendation of the Council on the issue.

II GENERAL REMARKS

2. The EEA EFTA States welcome and appreciate the European Commission's intensified engagement in co-operation in quality assurance in higher education. Like the European Commission, the EEA EFTA States are concerned with securing quality in higher education, as well as facilitating and enhancing co-operation in quality assurance.

3. In the proposal, 5 steps to achieve mutual recognition of quality assurance systems and assessment across Europe have been proposed. The EEA EFTA States appreciate a few of the proposed steps in the recommendation proposal, but would like to comment on certain elements which we find more controversial.

4. As a general comment, the EEA EFTA States would like to stress the work on co-operation in quality assurance being carried out within the Bologna Process, especially the project carried out by ENQA (the European Association of Quality Assurance Agencies) in co-operation with the European University Association (EUA), the National Union of Students in Europe (ESIB) and the European Association of Institutions in Higher Education (EURASHE) in developing mutually shared standards and guidelines for quality assurance across the European Higher Education Area (EHEA). These standards and guidelines were adopted by the Ministers for higher education at their

meeting in Bergen 19 – 20 May, and will encompass all the 40 member states of the Bologna Process, including the 25 EU Member States and the three EEA EFTA States. Several of the proposed steps of the recommendation are in line with the adopted standards and guidelines of the ENQA project. The EEA EFTA States ask the European Commission to take into consideration the work being carried out within the Bologna Process on the proposed Recommendation.

III SPECIFIC ISSUES

5. The proposed Recommendation consists of 5 steps (A-E) to achieve mutual recognition. The EEA EFTA States fully support the suggested internal quality assurance mechanisms (step A) which “*require all higher education institutions active within their territory to introduce or develop rigorous internal quality assurance mechanisms.*”

6. The suggested common set of standards, procedures and guidelines (step B) is closely linked to the work undertaken by ENQA within the Bologna Process. The EEA EFTA States welcome and support a common set of standards and guidelines for all quality assurance agencies in Europe.

7. The EEA EFTA States welcome in principle a European Register of Quality Assurance and Accreditation Agencies (step C), and fully support the external evaluation of quality assurance agencies. A European Register of Quality Assurance Agencies would, when operational, contribute to the furthering of mutual acceptance of methods of quality assurance. The Register will, according to the Annex, be composed of representatives of quality assurance agencies active in the member states, representatives of the higher education sector and social partners. How these representatives are elected and by whom, as well as the operational responsibility of the Register is unclear, as is also the legal status of the Register. The EEA EFTA States call for a further clarification of these issues. As a similar proposal has been put forward by ENQA and its partners in the Bologna Process, the EEA EFTA States call upon the Commission to take this point into consideration and to align it with the outcome of the Bergen Ministerial meeting and the wording of the Bergen Communiqué.

8. University Autonomy in choice of agency (step D): The Commission refers in the Recommendation to the fact that a few countries have opened up the possibility of recognising accreditation decisions from foreign agencies as equivalents to accreditation decisions by a national agency. The Commission advocates that such a system would be beneficial for co-operation in quality assurance between all Member States, and proposes that higher education institutions be free to pursue accreditation from any quality assurance agency provided it is in the European Register. The EEA EFTA States cannot at this stage support such a proposal. The responsibility for higher education and consequently quality assurance rests with the national authorities. The establishment of national quality assurance agencies with national quality assurance systems is an important development within quality assurance and it should be the responsibility and the right of the national authorities to decide whether accreditation given by foreign

quality assurance agencies be recognised as equivalent to accreditation given by the national agency or not.

9. Member State competence to accept assessments and draw consequences (step E): Referring to the comments made under (D) regarding the national authorities' responsibility for quality assurance, the EEA EFTA States cannot support this proposal. The national authorities have the overall responsibility for higher education within their country, including the financing of higher education. Thus it should be the responsibility of the national authorities to decide whether a foreign quality assurance agency meets the requirements set by the authorities as prerequisites for financing, or whether accreditation or other quality assurance decisions made by the national agency is an absolute prerequisite for financing by the national authorities. The EEA EFTA States would like to stress the importance of this decision and that it rests in the hands of the national authorities.

10. The alternative given by the European Commission is to retain institutional evaluation and accreditation in the national's hands and to allow higher education institutions to seek programme accreditation from a foreign agency. The EEA EFTA States support such a proposal provided that the programme accreditation is an *additional* accreditation to that which the higher education institution chooses to pursue for reasons of e.g. marketing, branding etc, and that this accreditation could not be a substitute for *national* programme accreditation if such accreditation is required within the national system of quality assurance. This type of additional accreditation would be the type of accreditation given already today by specialised quality assurance agencies within the fields of business studies, engineering etc. We underline that this type of accreditation should in no way replace the national programme accreditation (where required) unless the national authorities have explicitly opened up for this.

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