Improving recognition in the European Higher Education Area: an analysis of national action plans

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Improving recognition in the European Higher Education Area: an analysis of national action plans

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Foreword and acknowledgements

In their London Communiqué, ministers asked the Bologna Follow-Up Group (BFUG) "to arrange for the ENIC/NARIC networks to analyse our national action plans and spread good practice".

The European Network of Information Centres (ENIC) and the network of National Academic Recognition Information Centres (NARIC) appointed a working party for this purpose and the Council of Europe Secretariat commissioned Professor Andrejs Rauhvargers and Ms Agnese Rusakova to draft the study.

The working party was provided with administrative support by the Council of Europe Secretariat and had the following composition:

> Ms Carita Blomqvist (Finland, Chair)
> Ms Gayane Harutunyan (Armenia)
> Ms Christoph Demand (Austria)
> Ms Elpida Keravnou-Papaeliou (Cyprus)
> Ms Françoise Profit (France)
> Mr Luca Lantero (Italy)
> Mr Andrejs Rauhvargers (Latvia)
> Ms Frances Kelly (New Zealand)
> Mr Bruno Carapinha (European Student Union)

Mr Ruard Wallis de Vries (European Commission), Ms Venera Ioniţa and Mr Peter Wells (UNESCO/CEPES) also participated in the work of the group.

The Council of Europe Secretariat was represented by Mr Sjur Bergan and Mr Jean-Philippe Restoueix.

In view of the important role of recognition policies in shaping the European Higher Education Area, this study is of interest well beyond the circle of recognition specialists, and this is why the Council of Europe decided to publish it, with some supplementary material, in its Higher Education Series. We would in particular like to thank the European Association for Quality Assurance in Higher Education (ENQA) for its permission to include the Standards and Guidelines for Quality Assurance in the European Higher Education Area among the appendices.

Preface

This volume of the Council of Europe Higher Education Series brings together two key concerns of the Council of Europe in higher education policies: contributing to building the European Higher Education Area (EHEA) and improving the fair recognition of qualifications. More broadly, the Council's concern for fair recognition links to the Organisation's commitment to basic rights as well as to its increasing role in the development of qualifications frameworks and the concept of qualifications.[1]

The Bologna Process[2] was launched in 1999 at a meeting of the ministers responsible for higher education of 29 European countries. The Bologna meeting in June 1999 built on a meeting of four ministers – those of France, Germany, Italy and the United Kingdom – who met on the occasion of the 800th anniversary of the Sorbonne in May 1998. In Bologna, the ministers of the 29 countries adopted the Bologna Declaration and set an ambitious goal: that of creating the EHEA by 2010.

Today, the Bologna Process encompasses 46 countries, all of which are party to the European Cultural Convention. In addition, the competent public authorities of all 46 countries have committed in writing to the goals and policies of the Bologna Process, which has become the framework and the reference point for higher education reform in Europe. It has also attracted great interest from other parts of the world.

Ministerial conferences of the Bologna Process are held every two years, and each successive conference has set important new policies. Nevertheless, most of the policies have focused on structural reform in three areas:

− degree structures and qualifications frameworks;

− quality assurance;

− recognition of qualifications.

This is not to say that other areas are not important and, in particular in the latter part of the Bologna Process, there has been considerable focus on the social dimension of higher education as well as on the EHEA in a global context.[3] Nevertheless, the three areas of structural reform have been particularly important, and most national reform efforts have focused in particular on these three areas.

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1. See Bergan, Sjur (2007), *Qualifications. Introduction to a Concept* (Strasbourg: Council of Europe Publishing – Council of Europe Higher Education Series No. 6).

2. The best single source of information on the Bologna Process is its official website: www.ond. vlaanderen.be/hogeronderwijs/bologna/. The Council of Europe's higher education website also contains a section on the Bologna Process: www.coe.int/t/dg4/highereducation/EHEA2010/Default_en.asp.

3. For an overview of the different areas of the Bologna work programme, see: www.ond.vlaanderen. be/hogeronderwijs/bologna/actionlines/index.htm.

In each of the three areas, there are European standards and guidelines. In two of them, the standards have been developed and adopted within the Bologna Process. In 2005, Ministers adopted the overarching framework of qualifications of the EHEA and committed to developing their national frameworks to be compatible with the overarching framework.[4] They set a target date of 2010 but, at the time of writing, it seems overwhelmingly likely that this deadline will be extended to 2012. In 2005, ministers also adopted the Standards and Guidelines for Quality Assurance in the Europe Higher Education Area,[5] and in 2007 they agreed in principle that a European Quality Assurance Register for Higher Education (EQAR)[6] should be established. The EQAR came into being in 2008.

In the third area, however, the main standards were developed before the Bologna Process was launched and the further development of standards has continued in a framework that is distinct from the Bologna Process even if the links between the two are close. The Council of Europe/UNESCO Convention on the Recognition of Qualifications concerning Higher Education in the Europe Region was adopted at a diplomatic conference in April 1997 and it came into force in February 1999. Since the official title is long and since the diplomatic conference was held in the capital of Portugal, the convention is often referred to as the Lisbon Recognition Convention. The Lisbon Recognition Convention was referred to already in the Sorbonne Declaration and, in 2003 in the Berlin Communiqué, ministers stated that all countries in the Bologna Process should ratify the convention. Indeed, the speed with which this convention has been ratified is quite impressive. As of 23 March 2009, it had been ratified by 48 countries and signed by a further five. Only four countries of the Bologna Process – Belgium, Greece, Italy and Spain – had yet to ratify the convention and, of these, only Greece had not signed it. On the other hand, the Lisbon Recognition Convention has been ratified or signed by a number of countries outside of the EHEA. By 23 March 2009, ratifications included those of Australia, Belarus, Israel, Kazakhstan, Kyrgyzstan and New Zealand, while Canada and the United States have signed but not yet ratified the convention.

The ministerial meeting of the Bologna Process in Berlin in 2003 was important, not only because it made explicit the need for countries of the Bologna Process to ratify the Lisbon Recognition Convention and because it made it possible for European countries that were not party to any of the higher education programmes of the European Union to accede to the Bologna Process, but also because for the first time ministers were not content only to devise plans for future action. In 2003, the Bologna Process had almost arrived at the halfway mark between the adoption of the Bologna Declaration in 1999 and the foreseen date for establishing the EHEA in 2010. That, as well as discussions about criteria for admitting new members, led

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4. See the Bologna website on qualifications frameworks: www.ond.vlaanderen.be/hogeronderwijs/bologna/qf/qf.asp.
5.Available at: www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/Standards-and-Guidelines-for-QA.pdf.
6. See EQAR website: www.eqar.eu/home.html.

the ministers to the conclusion that if the main goals of the Bologna Process were to be reached by 2010, they needed to assess progress well before that date.

Hence the stocktaking process was born and ministers agreed to submit to an assessment as to how far they had progressed in implementing the main policies of the Bologna Process. This was significant not only because the Bologna Process relies on implementation at national and institutional level of goals and policies agreed at European level, but also because ministers accepted a strong element of external assessment as to how successful they had been in implementing these policies. The first stocktaking report was submitted to the ministerial meeting in 2005 and other reports followed in 2007 and 2009. Even if overall progress in implementing the goals and policies of the Bologna Process has been good, it has been less than satisfactory in some policy areas, and some countries have registered low scores in several policy areas.

The national action plans for recognition are another indication of the fact that if the key policy goals of the Bologna Process are to be reached by 2010, we need to take stock of progress and to make plans well before then. The ministerial meeting in Bergen in 2005 recognised that while the main legal framework for recognition was in place through the Lisbon Recognition Convention and its subsidiary texts, the most important challenge is how the legal texts are implemented in practice. The Bergen Communiqué therefore stated:

> We commit ourselves to ensuring the full implementation of its principles, and to incorporating them in national legislation as appropriate. We call on all participating countries to address recognition problems identified by the ENIC/NARIC networks. We will draw up national action plans to improve the quality of the process associated with the recognition of foreign qualifications. These plans will form part of each country's national report for the next Ministerial Conference.

With a few exceptions, countries submitted their national action plans in time for the London ministerial conference in 2007. Put together, the plans run to some 700 pages.[7] The sheer volume of the plans provides a good reason for why a synthesis was desirable, but it was not enough simply to provide an executive summary of each national plan. Not only brevity, but also analysis, was of the essence and the task was confined to the European Network of Information Centres (ENIC) and the network of National Academic Recognition Information Centres (NARIC) (ENIC/NARIC networks). The London Communiqué clearly sets out the rationale for the task:

> There has been progress in the implementation of the Lisbon Recognition Convention (LRC), ECTS and diploma supplements, but the range of national and institutional approaches to recognition needs to be more coherent. To improve recognition practices, we therefore ask the Bologna Follow-up Group (BFUG) to arrange for the ENIC/ NARIC networks to analyse our national action plans and spread good practice.

7. Accessible through: www.dcsf.gov.uk/londonbologna/index.cfm?fuseaction=docs. list&DocCategoryID=17.

The ENIC and NARIC networks appointed a working party, chaired by Carita Blomqvist and for which the Council of Europe provided the secretariat, to oversee the analysis, which was written by Andrejs Rauhvargers and Agnese Rusakova.

The analysis shows only too well why a mere synthesis of the replies was not sufficient. In many ways, the results of the plans were disappointing, starting with the fact that while most reports purported to be plans for the future, they more often than not focused on describing the present state of affairs. Even if many answers provided examples of good practice, there was also no shortage of examples of the opposite. However, this state of affairs did not necessarily lead the country in question to devise a plan to improve practice. The chapters that follow analyse the issues in detail and this brief introduction is not the place in which to summarise the analysis except to say that it documents that improvement is needed in all areas covered by the survey:

−   legislation;
−   recognition practice;
−   information provision;
−   structures.

In this sense, it is important to note that the analysis concludes by providing examples of what has diplomatically been termed "good and not so good practice".

However, it is important to underline why the present state of imperfection and the lack of plans to remedy this state represent a serious challenge to the EHEA, beyond the obvious concern that European countries committed to doing something many of them have failed to do. They should be putting forward plans to improve recognition rather than describing current practice with few indications of how learners may better obtain the fair recognition that is their due.

The EHEA is built on the assumption that mobility of learners and graduates is an important part of what it means to be European and that fair recognition of qualifications is an essential policy element to attain this key goal of the Bologna Process. Mobility does not depend on fair recognition alone and cannot be achieved without financial support, easy granting of visas and, where appropriate, work permits and a range of other measures. Nevertheless, each of these measures, however important each one may be by itself, will be of little avail unless qualifications are recognised fairly across borders.

Fair recognition does not mean that all qualifications must be recognised as the holder of the qualifications might wish, or that "anything goes". The right to recognition, which is a key principle of the Lisbon Recognition Convention, implies that every holder of a qualification has the right to have his or her qualifications assessed on the basis of their true merit, without regard to extraneous factors such as, for example, the nationality or the political and religious convictions of the applicant. It means that the assessment must be conducted with an open mind and

with a view to making recognition possible if the merits of the qualification justify recognition. It also means that if the competent recognition authority reaches the conclusion that the qualification should not be recognised, it is up to the competent authority to demonstrate why this is a fair conclusion. It is not up to the applicants to demonstrate why the qualification should be recognised. The basic assumption of the convention is that foreign qualifications should be recognised and it is up to the competent authorities to demonstrate the validity of their reasons for refusing recognition. If recognition cannot be granted, the first alternative that should be explored is not outright non-recognition but partial recognition. This implies that even if the applicants cannot receive the full recognition they want, their qualifications will be assigned some value in the education system of the country in which they apply for recognition so that they may be able to obtain the recognition they want by completing some additional learning but without having to take all the courses leading to the qualification over again.

A key provision of the convention is that differences between the qualification for which recognition is sought and the similar qualification of the host country must be substantial if they are to constitute a valid reason for non-recognition. Small differences between qualifications are not valid reasons for non-recognition; indeed, the opportunity to learn something different from what one might learn at one's home institution is an important reason why many students wish to take a part of their education abroad in the first place. No legal text can provide a full overview of what might constitute "substantial differences", and one of the main aims of recognition policy at European level over the past few years has been to try to develop a common understanding of this key concept. The ENIC and NARIC networks have explored the concept at three consecutive network meetings – in 2006, 2007 and 2008 – and, at the two latest meetings, they have worked on concrete cases. A publication on "substantial differences" is under way and it is hoped we will be able to publish it in the Council of Europe Higher Education Series in 2010. Nevertheless, both the discussion in the ENIC and NARIC networks and the national action plans on recognition indicate that much remains to be done in this area and that many credentials evaluators tend to take quite narrow views of how different qualifications may be before the differences become "substantial".

In spite of infinite variations, it seems justified to refer to two broad categories of attitudes or "cultures".[8] Some credentials evaluators see it as their main responsibility to "protect" their own education system and institutions from less good foreign qualifications, and they will want to be "110%" certain of the quality of a foreign qualification before they recognise it. They will often take a quite legalistic approach to recognition and they will tend to use legal regulations to find reasons to justify non-recognition. Other credentials evaluators will see it as their main task to assist individual learners in obtaining the best possible recognition for their qualifications. They will tend to recognise qualifications even if they may not fully correspond to

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8. See Bergan, Sjur (2004), "A Tale of Two Cultures in Higher Education Policies: the Rule of Law or an Excess of Legalism?", *Journal of Studies in International Education*, Vol. 8, Issue 2.

the similar qualification in their own country, provided they are convinced that the learner has the potential to succeed in the further study or in the professional career for which he or she needs recognition. These are, of course, "ideal types" and, even if there seem to be systematic differences in attitudes to recognition, these should not hide the fact that there are many cases in which exponents of both broad sets of attitudes will agree either that recognition is warranted or that it would be inappropriate. The two "cultures" describe broad sets of attitudes and not absolute categories. It should also be underlined that they are individual attitudes and not national or institutional stereotypes. A given "culture" may be found more frequently in some countries than in others, but all credentials evaluators in a given country do not necessarily belong to the same "recognition culture".

Nevertheless, these broad sets of attitudes also seem to be reflected in the national action plans. Some countries have quite restrictive recognition practices, often coupled with relatively cumbersome recognition procedures. Only rarely do the national action plans reveal a concern that these attitudes and practices might need revision, and rarer still are the plans for such revision. In some cases, the national action plans even seem to indicate that it is the countries with the most advanced practice in a given recognition area that are also planning to develop that practice further. One of the goals of the ENIC and NARIC networks is to develop a joint understanding of "best practice", and the national action plans indicate that this goal is only partially achieved.

Stimulating academic mobility is one of the main goals of the EHEA and there is justified concern within the Bologna Process that much work remains to be done before this goal can be achieved. The fair recognition of qualifications is not the only factor that could help achieve the goal, but the analysis of the national action plans clearly demonstrates that substantial work remains before the recognition community can be satisfied that it has done its part in promoting academic mobility.

This is not the only reason for concern. That much remains to be done is a clear challenge but the greater challenge may nevertheless be that in too many countries there seems to be little sense of urgency in the matter, nor is there a feeling that each country can make a difference by improving its recognition policy. The Bologna Process has helped move the recognition of qualifications away from being the domain of specialists, tucked away in corner offices where they could build up detailed knowledge of individual education systems relatively unperturbed by broader concerns, to being a key area of higher education policies. Hence, the way in which individual recognition cases are approached must build on broader concerns of principle and must be aligned with the stated purpose of improving mobility as well as with the key principle of the Lisbon Recognition Convention – the only legal text of the Bologna Process – of providing individual learners with fair recognition of their qualifications. The analysis of the national action plan justifies the conclusion that the international legal framework is largely in place but that implementation is still lacking. The analysis also justifies a quite strong concern that many countries of the Bologna Process either have not quite realised the importance

of recognition policies in making the EHEA possible or are unwilling to take the necessary steps needed to make fair recognition of foreign qualifications a characteristic of the EHEA. This will remain a major challenge to "Bologna beyond 2010", and it is one that requires clear policies with some sense of urgency.

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The importance of the analysis of the national action plans for recognition made it natural to aim for a broader circulation and a longer shelf life than what would have been the case had it simply remained a "Bologna document" available on a website and as a traditional document. By publishing this substantial study in the Council of Europe Higher Education Series, we hope to give it the attention it deserves and to help stimulate not only debate on recognition issues but also action at international, national and institutional level to make it easier for learners to obtain fair recognition of their qualifications.

The study was entrusted to two highly qualified authors. Andrejs Rauhvargers, the co-ordinator of the study and the author of chapters 1 and 2 and of the introduction, conclusions and executive summary, is Professor of Education at the University of Latvia and he is probably the most experienced policy maker in the area of recognition in Europe. He started his international career by setting up and running the Latvian national information centre on recognition in the 1990s and rapidly became one of the leading members of the ENIC network. He was President of the ENIC network from 1999 to 2001 and then President of the Lisbon Recognition Convention Committee from 2001 to 2007. He was also a member of the Bureau of the Council of Europe's Steering Committee for Higher Education and Research (CDESR) from 2003 to 2009, and has represented Latvia in the Bologna Follow-Up Group since 2000. Andrejs Rauhvargers is also no stranger to analysing national contributions to the Bologna Process since he has chaired the Bologna Stocktaking Working Group since 2005 and has thus led the work on the two stocktaking reports submitted in 2007 and 2009. Agnese Rusakova is a doctoral student in management at the University of Latvia and is the main author of chapters 3 and 4 of the report. Hence, both authors hail from Rīga, which – along with Lisbon and, I hope, Strasbourg – has become something of a "recognition capital" in Europe.

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Summary

Part I – Legislation

Ratification of the Lisbon Recognition Convention

Out of 46 "Bologna" countries, 38 had ratified the Convention on the Recognition of Qualifications Concerning Higher Education in the European Region (Lisbon Recognition Convention) at the time when the national action plans for recognition were prepared. Andorra, Germany, Turkey and the Netherlands added their ratifications later. Belgium and Italy have signed the Lisbon Recognition Convention but not ratified it and Greece and Spain have not yet signed it.

Legislation review

Quite a number of countries have not provided any timetable or details of the organisation of the review of national legislation. A significant number of countries state that their legislation is already in compliance with the Lisbon Recognition Convention even if it has not been amended after joining the convention. In reality, while there may be no explicit contradiction between national legislation and the *letter* of the legal framework of the convention, a doubt remains as to whether there is also no contradiction with the *spirit* of the Lisbon Recognition Convention and its subsidiary texts.

Some countries use outdated terminology which is linked to concepts that are not compatible with the Lisbon Recognition Convention. Thus, at least five countries still use the term "nostrification", which is linked to a recognition concept seeking full identity of the foreign qualification, or the term "equivalence". Neither of these is used in the Lisbon Recognition Convention or its subsidiary texts because they are linked with the outdated principle where the main focus of assessment was on detailed comparison of curricula and lists of material studied.

Legal and autonomy-related implementation difficulties

In some cases countries report problems in implementing the Lisbon Recognition Convention because the national legislation is in contradiction with the legal framework of the convention. This indicates that the country should either amend its legislation or ensure that the international legislation is given priority.

Some countries report that since the recognition decisions are taken by the higher education institutions and since these institutions are autonomous, the state cannot ensure that the principles of the Lisbon Recognition Convention are followed. This is clearly not acceptable practice and these countries, through their laisser-faire approach, actually do not fulfil the requirements of the convention in that they

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should take all possible steps to apply the Lisbon Recognition Convention provisions in higher education institutions.

One good solution to this issue is to make the recognition of qualifications in higher education institutions part of quality assurance so that compliance with the Lisbon Recognition Convention can be assessed. Another solution is for the state bodies that monitor the observation of national law by higher education institutions to also monitor their observation of the convention principles. A less favourable solution mentioned by some countries is that recognition decisions are made by a central body – the minister or somebody in his/her name – and not by higher education institutions.

Follow-up measures

In most countries the follow-up procedures planned do not involve amendments to legislation but rather information and dissemination measures.

Bilateral agreements

Not all countries have bilateral recognition agreements. The number of bilateral agreements is typically 5-10 per country. Bilateral recognition agreements are often concluded either among countries which are geographically/historically close or with countries which are not part of the European region and are therefore not covered by the Lisbon Recognition Convention.

It is worth considering the proposal not to conclude further bilateral agreements among parties to the Lisbon Recognition Convention in order to support the implementation of the convention in the countries involved in the Bologna Process.

Part 2 – Recognition practice

Nearly all the countries declare that the recognition criteria and procedures they use are in compliance with the Council of Europe/UNESCO Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study.

Procedures

Authenticity and translations

Practice in some countries still seems to be exaggerated. Requesting that all documents presented are officially translated and have "apostille"[9] is burdensome to the applicants while the verbatim official translations may appear misleading from a recognition point of view. A good practice would be not to require translations if the documents are in widely spoken languages. Countries replying to this point mention, for example, English, German, French, Spanish and also Latin.

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9. Legalisation of a public act or document.

Comparing qualifications with the relevant host country's qualification

With few exceptions the recognition procedures include comparing the foreign qualification in question with the relevant qualification in the host country.

Some countries have invented a procedure whereby it is possible to recognise a foreign degree as a general degree or as corresponding to a certain Bologna cycle without comparing it to a particular host country's qualification. It is not clear, however, whether this recognition procedure, which is claimed to be less time-consuming and simpler, gives the holder full rights in acceding to further studies and the labour market or whether it is just a pro forma statement with few or no legal consequences. Some examples of unacceptable practice include instances where some countries tend to assess the foreign institution and programme using quite formal criteria rather than relying on the information on the status of institution and programme provided by the country of origin, something mentioned as an important principle by a number of other countries.

A clearly positive development is the move away from seeking that the foreign qualification could replace the relevant home qualification in all aspects towards comparing only those aspects relevant to the right or function which the holder of the qualification is trying to exercise. In some countries there are separate avenues for different kinds of qualifications, so assessment can be done using different procedures or by different bodies depending on the profile ("academic" or "applied"/"professional") or level ("postgraduate" – doctoral and master – degrees can be treated separately from bachelor degrees, "Bologna" degrees separately from "pre-Bologna") and finally depending on whether the master degree has been obtained in the same field (and institution) which awarded the bachelor degree.

Partial recognition

In many countries partial recognition is possible if there is a substantial difference between the qualification for which recognition is sought and the corresponding qualification in the host country. Looking at the recognition criteria mentioned in the national action plans the question still remains as to whether granting partial recognition in each particular case is a good or a bad practice. Has it been applied because some important learning outcomes of the foreign qualification were missing which would prevent the applicant from being able to pursue the intended learning or professional activities? Or is partial recognition granted more because the content of studies was not identical?

Links between procedures of academic and professional recognition

Many countries report that academic recognition often has consequences for the non-regulated part of the labour market. An alarming finding, however, is that some countries require full academic recognition (including comparison of programmes carried out by higher education institutions) if the applicant intends to enter a

regulated profession. There seems to be a growing number of countries that attempt to assess qualifications even in cases where evidence is incomplete or lacking.

Recognition procedure in two stages

In many cases the first stage ends with the issue of a statement that serves as a recommendation to the competent authority which takes the decision. This often is a higher education institution, but it is not the only possibility. In different countries there are various two-stage procedures that are not compatible with each other. For instance, recognition for further studies and "establishing equivalence" can be the result of the second stage of recognition in some countries, but are the result of the first stage in others. In the latter case it looks as if in some countries the second stage rather resembles the "nostrification" of an earlier age. A discussion is needed at European level to clarify the terminology used and the stages of the recognition procedure with a view to agreeing upon coherent and mutually understandable procedures across Europe.

Criteria

The criteria used and the relative importance of different criteria vary significantly from country to country. Criteria may vary from comparing learning outcomes to attempting to assess the teaching staff of an institution in another country. Approaches indicated in the replies include, for example, taking into account differences in the education systems, counting on quality and trusting quality assurance in other countries, assessing learning outcomes wherever possible, attempting to take into account prior learning and taking into account previous recognition practices in similar cases. Giving consideration also to the purposes for which recognition is sought and study workload seems to constitute an up-to date approach to recognition.

However, a number of countries mention such criteria as the content of the curriculum and the length/duration of the programme instead of, for example, learning outcomes. These seem quite backward-looking approaches.

Attempts to improve recognition criteria and procedures

Not all countries are planning any measures to improve recognition practices as a result of the review of legislation and procedure. The main measures countries are planning for the improvement of procedures and criteria are: ensuring possibilities for applicants to appeal, the dissemination of information on recognition criteria and procedures among all stakeholders, updating of the criteria for recognition according to the latest developments in the Bologna Process, establishing databases of recognition decisions, assisting higher education institutions and monitoring the drawing up and implementation of institutional regulations. It should be noted that the countries that already demonstrate the best recognition practices also plan most measures for improvement.

Time required for recognition

In most cases applications for recognition are processed within a three-month limit and the time needed is even being reduced.

Joint degrees

In the 2005-2007 period a number of countries changed their legislation with regard to joint degrees. Another group of countries states that while the law does not specifically mention joint degrees, there are no legal obstacles for their establishment either. However, the lack of mention of joint degrees in the legislation does not necessarily mean that there are no legal obstacles to awarding them. Obstacles to joint degrees often arise from various regulations that have been prepared without regard to the possibility of offering joint degrees.

A number of countries still have no possibility of awarding state-recognised joint degrees and therefore they use joint programmes as a way out. The graduates would then receive one degree from their "home" institution.

In several countries the ministry, the rectors' conference, the ENIC/NARICs[10] or these organisations in co-operation have prepared guidelines for establishing joint programmes.

Most countries state that their legislation allows recognition of joint degrees (meaning joint degrees from abroad that are submitted for recognition). In the majority of cases, countries mention the criteria listed in the Recommendation on the Recognition of Joint Degrees[11] as the criteria they use for recognition of joint degrees.

Institutional practices

A number of countries either do not answer this part or just state that they do not have any information on institutional practices and just describe the measures that the ENIC/NARIC takes in order to assist institutions. Only a few countries have actually carried out institutional reviews but not all of them describe the results in their national action plans. There are only a couple of countries that can report that the institutions follow common guidelines or use common recognition procedures. The institutional practices seem to be better co-ordinated in cases where recognition of qualifications at higher education institutions is included in the quality assurance system. In some cases the institutional reviews have indicated that higher education

10. For more information on the ENIC and NARIC networks as well as on the national information centres that constitute the two networks, see: www.enic-naric.net/.

11. The recommendation was adopted by the Lisbon Recognition Convention Committee in 2004 as a subsidiary text to the convention. The text of the recommendation may be found at: www.enic-naric. net/documents/recommendation-joint-degrees-2004.en.pdf; while the explanatory memorandum is available at: www.enic-naric.net/documents/recommendation-joint-degrees-2004-expl.en.pdf.

institutions still have difficulties with recognition of study periods/credits and therefore need more information and training.

The institutional procedures in recognition of credits may range from comparing learning outcomes to looking for full compliance with their own curricula.

Diploma Supplement

Many countries made the issuing of the Diploma Supplement[12] compulsory between 2002 and 2005. In 2007, in more than half the countries, all graduates receive this automatically, free of charge and in a widely spoken language. If countries that issue a Diploma Supplement upon request are also included, in 2007 graduates received these in two thirds of the countries. There are, however, several countries that seem to issue the diploma supplements to the graduates of the "new style" bachelor and master degrees but do not issue it to graduates from the "old style" long one-tier study programmes.

It should nevertheless be recalled that, in the Berlin Communiqué (2003), ministers set the objective that every graduating student should receive the Diploma Supplement automatically, free of charge and in a widely spoken language by 2005. The national action plans show that even at the end of 2006, half of the Bologna member states had yet to comply with the ministers' commitment.

Some countries have created national versions of the Diploma Supplement but it is not clear from the national action plans if the "national" diploma supplements fully follow the EU/Council of Europe/UNESCO Diploma Supplement format and to what extent they are customised. Most countries issue the Diploma Supplement in both the national language and a widely spoken European language (most often English), but there are also countries where it is available in a widely spoken European language only on request.

Implementation of ECTS[13]

While the implementation of ECTS as a credit transfer and accumulation system is indeed progressing, there are a number of issues to be noted:

−   in quite a number of countries credit systems are used for both transfer and accumulation;

−   not all countries, however, use ECTS itself; there are a number of cases where an ECTS-compatible national credit system is used;

−   ECTS key features should be further discussed and fine-tuned so that all countries can adhere to the definitions therein;

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12. Details of the Diploma Supplement are available at: www.enic-naric.net/documents/the_Diploma_Supplement.pdf.
13. For further information on the European Credit Transfer and Accumulation System, see: http://ec.europa.eu/education/lifelong-learning-policy/doc48_en.htm.

–   there are some countries where a credit system is implemented but it does not yet apply to all higher education;

–   in most countries implementation of ECTS so far has not concerned linking credits with learning outcomes. There is a growing understanding that linking credits with learning outcomes is an important component of the credit system. However, implementation of this feature of ECTS will still take time;

–   a good practice seems to be using quality assurance as a tool for implementation of ECTS, that is, setting implementation of ECTS as a quality requirement.

Transnational/borderless education

Countries express their good will to give the green light to bona fide transnational/ borderless education, but they also express concern about possibilities to access reliable information on the quality of transnational education, possibilities to check whether transnational e-learning has been properly assessed and whether allocation of credits for work experience has been properly done. These issues have often been discussed but proper solutions have yet to be found.

Part 3 – Information provision

The quality of information provision seems to vary between countries, and the spectrum seems to be quite broad. It ranges from countries that have excellent information for applicants in their national language and in English (or other widely spoken European languages) available online, in printed and possibly in other forms, to countries where only a minimum of information is provided in the national language only and this information may be available at the ENIC/NARIC. An example of good practice is that provision of recognition information is co-ordinated between ENIC/NARICs and the higher education institutions so that the specific information from higher education institutions adds to the general information provided by the ENIC/NARICs.

Information on education systems is well established in some countries, but some countries only provide general information on their education systems that contains too little information of the kind that is actually needed for credential evaluation.

Part 4 – Structures

National information centres

The European Network of Information Centres (ENIC) and the network of National Academic Recognition Information Centres (NARIC) have an important role in academic and professional recognition. The most typical case is that the national information centre (ENIC/NARIC) is an advisory body for both academic and professional recognition, while the decisions are taken:

–   for academic recognition – by higher education institutions;

−   for de facto professional recognition in non-regulated professions – by employers;
−   and for regulated professions (de jure professional recognition) – by the competent authorities of each profession.

There are several other possibilities, including:

−   the ENIC/NARIC is the decision-making body for all cases of recognition;
−   the ENIC/NARIC makes a decision in the name of the minister; or
−   decisions are taken by a minister/vice-minister/ministry based on advice from:

    -   the ENIC/NARIC;

    -   higher education institutions; or

    -   committees of academics/scientists.

In a number of countries the ENIC/NARIC makes recognition decisions with a view to employment in non-regulated professions.

In most cases the de jure professional recognition for employment in regulated professions is carried out by competent authorities (often professional organisations) nominated by the government, but in some countries the specific ministries are in charge.

Capacity development

Competence development is underlined as an important aspect by a number of ENIC/NARICs. The main kinds of capacity-building measures inside the ENIC/NARICs are staff training and regular updating of information and competences, participation in the joint ENIC/NARIC meetings, study visits, organising national or regional training and dissemination events (Nordic and Baltic countries, among others), preparing detailed manuals for staff, recruiting staff with specific knowledge of education and/or language skills relevant to different world regions. Another important aspect of capacity building is organising different dissemination and training events for the recognition staff of higher education institutions and providing guidance to higher education institutions.

Again, many of these important measures seem to be present in a number of the most well-supported and developed national information centres while a number of others mainly mention study visits or have not given any notion of capacity-building measures at all.

Co-operation between recognition and quality assurance bodies

Information on quality assurance is used in the daily work of credentials evaluation. In a number of countries the ENIC/NARICs widely use information on quality assurance when assessing foreign qualifications. They also provide other ENIC/NARICs with information on the quality assurance status of programmes and

institutions in their countries. As the information on quality assurance is often accessible online, the above does not necessarily mean that ENIC/NARICs have intensive daily contact with their own country's quality assurance body.

The most far-reaching agreement between ENIC/NARICs and quality assurance bodies is the joint declaration made by some of the countries participating in the European Consortium for Accreditation in Higher Education.[14] Its final goal – the eventual automatic recognition of qualifications – can, however, only be reached through long-term bilateral work. It has been noted that recognition and quality assurance bodies often discuss the relevant issues and work together at various national working groups or during workshops, especially in those devoted to the establishment of national qualifications frameworks. Quality assurance is a powerful implementation tool in the framework of the Lisbon Recognition Convention in higher education institutions if the assessment of recognition practices becomes part of the quality assurance system of institutions and programmes.

Conclusions and recommendations

Conclusions

1.   Four "Bologna" countries remain that had not ratified the Lisbon Recognition Convention as of 12 May 2008: Belgium and Italy have signed the convention but have not ratified it, and Greece and Spain have not signed it.

2.   The national action plans demonstrate that there are still legal problems in implementing the principles of the Lisbon Recognition Convention and its subsidiary texts in the countries that have not amended their legislation to adopt the principles of the convention.

3.   In some countries there are difficulties in implementing the principles of the Lisbon Recognition Convention and its subsidiary texts due to the interpretation of the autonomy of higher education institutions. The best way to overcome these difficulties is to make the recognition process a part of both internal quality assurance of higher education institutions and external quality assurance.

4.   The national action plans clearly demonstrate that the terminology used in different countries with regard to recognition is too diverse and unclear. The same terms have different meanings in different countries and in other cases different terms are used in different countries. It creates misunderstandings and certainly does not improve mutual understanding.

5.   The terminology used in the national legislation of some countries includes the terms "nostrification" and "equivalence", which are outdated concepts of

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14. The Joint Declaration concerning the Automatic Recognition of Qualifications can be accessed through the European Consortium for Accreditation (ECA) website: www.ecaconsortium.net/index. php?section=content&id=1.

recognition and not compatible with the principles of the Lisbon Recognition Convention.

6.   Some countries that have bilateral recognition agreements with other countries have not updated these agreements according to the principles of the Lisbon Recognition Convention.

7.   To support implementation of the Lisbon Recognition Convention new bilateral agreements among parties to the convention should not be concluded. If applicable, bilateral recommendations could be developed by these countries.

8.   In some countries the requirements for translation and legalisation of documents are exaggerated. Countries should look for possibilities to reduce the number of documents that need to be translated.

9.   In most countries the recognition procedure includes comparison of the foreign qualification with the relevant qualification in the host country. Some countries have started an "easier" recognition procedure recognising the general level of the qualification without comparing it to a particular host country's qualification. While the overall development seems positive, it should be clarified what rights that kind of recognition gives to the holder of the qualification in question.

10.   In most countries the recognition procedure involves two steps, but these steps can differ. The first step varies and may be a recognition statement, which is advice to the competent authority making the decision on recognition for further studies, or an "equivalence" statement. The second step in turn varies from a decision on recognition for further studies to "full comparability" with the issuing of the diploma of the host country. The steps of the procedure must be discussed at European level and steps should be taken to make procedures more coherent.

11.   The ENIC/NARIC can have a different role in the diverse national recognition procedures. Its statement on recognition can be advice to higher education institutions or advice to the minister or another central body taking the decision, or the ENIC/NARIC itself may be the competent authority making decisions. This is yet another issue where European practices are different and it should be part of the European discussions to be initiated in order to come up with proposals for more coherent procedures and criteria across the EHEA.

12.   The criteria used and their relative importance vary from country to country. The contemporary approaches use quality assurance status, learning outcomes and level as the main criteria; some others first look at content of the curriculum and the length/duration of studies.

13.   The time used for the recognition procedure seems not to deviate much from the recommended three months and is much shorter in some cases. Therefore, the time required for processing applications for recognition generally does not seem to be an issue.

14.   A number of countries have amended their legislation to allow for the establishment of joint degrees, whereas others state that there are no legal obstacles for establishment of joint degrees, as the law does not specifically mention them. However, the national action plans demonstrate that lack of mention of joint degrees in the legislation does not necessarily mean that there are no legal obstacles to awarding them.

15.   In many countries ENIC/NARICs have a very limited knowledge regarding institutional recognition practices and outcomes of assessment at the higher education institutions. It also means that these countries cannot guarantee the application of internationally approved principles in their higher education institutions. A more intensive co-operation should be established between the national ENIC/NARICs and higher education institutions both for better support and guidance to higher education institutions and for better information on the recognition procedures and decisions at higher education institutions.

16.   The Diploma Supplement is issued automatically, free of charge and in a widely spoken language in many countries. In some countries it is issued in just part of the higher education system. It is not always clear whether the Diploma Supplement is issued to graduates of all levels of qualifications and whether the "national" diploma supplements fully follow the European Diploma Supplement format.

17.   Implementation of ECTS or compatible national credit systems is progressing. However, credits are not yet linked with learning outcomes. In some countries ECTS is implemented only for the "new" bachelor and master programmes. Using quality assurance as a tool for ECTS implementation might help the process.

18.   While there is the good will to respect the bona fide borderless education provision in some countries, in a small number of countries qualifications earned through transnational arrangements are not recognised at all. The main principles for recognition of transnational qualifications quoted in the national action plans are those outlined in the Code of Good Practice in the Provision of Transnational Education.

19.   The quality of information provision both on one's own higher education system and on the recognition procedures and criteria varies greatly between different countries. Providing information being one of the main tasks of the ENIC/NARICs, there is a clear need to improve information provision in some of them.

20.   There is close co-operation between recognition and quality assurance bodies, since the recognition bodies intensively use quality assurance information. Due to the fact that quality assurance information is often available online and that ENIC/NARICs successfully obtain the necessary information from abroad through the ENIC/NARIC channels, the co-operation between the national recognition and quality assurance bodies may not be very visible. The co-operation between the two bodies becomes closer because of work on national qualifications frameworks

and because quality assurance can be used as a tool for the proper implementation of the Lisbon Recognition Convention.

Recommendations

To the ministers

1.   Ministers of those "Bologna" countries that still have not become parties to the Lisbon Recognition Convention are recommended to sign and/or ratify the convention without further delay.

2.   Ministers of those countries that have not amended their legislation to adopt the principles of the Lisbon Recognition Convention and its subsidiary texts are recommended to assist their ministries in preparation of the amendments in line with the principles of the legal framework of the Lisbon Recognition Convention.

3.   Ministers of those countries that have not amended their legislation to allow and encourage establishment and recognition of joint degrees are recommended to do so.

4.   Ministers of all countries are recommended to include the quality of institutional recognition procedures in the internal quality procedures of the higher education institutions and also to include it in the external quality reviews.

To the ENIC and NARIC networks

1.   The ENIC and NARIC networks should work to clarify the differences in terminology used in the recognition legislation and practices of different countries and take steps to move towards a coherent terminology across the EHEA.

2.   The networks should organise discussions between the national ENIC/NARICs to clarify the differences in the recognition criteria and procedures among the countries. On the basis of these discussions, taking into account new developments in the EHEA and the results of the Working Party on Substantial Differences, a revised Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study should be drafted by the bureau of the Lisbon Recognition Convention Committee.

3.   This revised draft recommendation should be submitted to the Lisbon Recognition Convention Committee for adoption in 2010.

To national ENIC/NARICs

1.   ENIC/NARICs of those countries that have not amended their legislation to adopt the principles of the Lisbon Recognition Convention and its subsidiary texts are recommended to assist their ministries in the preparation of the amendments.

2.   With a view to improving mutual recognition with countries outside the EHEA, the ENIC/NARICs are encouraged to apply the principles of the Lisbon Recognition

Convention also to the assessment of qualifications from countries that are not parties to the convention.

3.   ENIC/NARICs should provide information, guidance and counselling to the higher education institutions in order to help them establish and maintain recognition procedures based on the principles of the legal framework of the Lisbon Recognition Convention.

To higher education institutions

1.   Higher education institutions should make the recognition of qualifications a part of their internal quality assurance.

2.   They should draw up institutional guidelines and recommendations for recognition ensuring implementation of the principles of the Lisbon Recognition Convention across the institution.

3.   They should ensure implementation of the Lisbon Recognition Convention at the level of faculties and departments.

4.   They should co-operate with other higher education institutions and the national ENIC/NARIC with a view to ensuring coherent recognition across the country.

Introduction

The mutual recognition of qualifications is a prerequisite for mobility of students, staff and graduates, and thus is also one of the cornerstones of a genuine European Higher Education Area (EHEA).

At their 2005 conference in Bergen the European ministers responsible for higher education[15] committed themselves to ensuring the full implementation of the principles of the Council of Europe/UNESCO Convention on the Recognition of Qualifications concerning Higher Education in the Europe Region (Lisbon Recognition Convention), and to incorporating them in national legislation as appropriate. They called the participating countries to address recognition problems identified by the ENIC[16] and NARIC[17] networks in their Strasbourg Statement of 2004[18] and to draw up national action plans for recognition to improve the quality of the process associated with the recognition of foreign qualifications. The national action plans for recognition had to be prepared according to guidelines[19] adopted by the ENIC and NARIC networks and adopted by the Bologna Follow-Up Group (BFUG). The deadline for submission was 15 December 2006. The guidelines are reproduced in Appendix II.

In their London Communiqué, ministers asked the BFUG "to arrange for the ENIC/NARIC networks to analyse our national action plans and spread good practice". The ENIC and NARIC networks appointed a working party for this purpose and the Council of Europe Secretariat commissioned Professor Andrejs Rauhvargers and Ms Agnese Rusakova to draft the study.

Most countries involved in the Bologna Process submitted their national action plans – although many did so with a substantial delay. The five countries that did not submit national action plans were Azerbaijan, the Holy See, Luxembourg, Moldova and Portugal. Russia submitted a document of a somewhat different character – the "Plan of activities aimed at supporting the development of export

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15. The European Higher Education Area – Achieving the Goals. Communiqué of the Conference of European Ministers Responsible for Higher Education, Bergen, 19-20 May 2005, www.aic.lv/ace/ace_disk/Bologna/Bergen_conf/050520_Bergen_Communique.pdf.
16. ENIC network – Council of Europe and UNESCO European Network of National Information Centres on academic recognition and mobility.
17. NARIC network – the EU Network of National Academic Recognition Information Centres.
18. ENIC and NARIC networks Strasbourg Statement on recognition issues in the European Higher Education Area, adopted at the 11th Joint Meeting of the ENIC and NARIC Networks, Strasbourg, 7-8 June 2004, www.aic.lv/ace/ace_disk/Bologna/Statem/ENICStrasStat.pdf .
19. Guidelines for national action plans for recognition, approved by the Bologna Follow-Up Group, Vienna 7 April 2006, www.aic.lv/ace/ace_disk/2005_07/Nat_actpl/Actionplan_Guidelines_31May2006.pdf.

of educational services for the period up to the year 2008" which included some elements relevant to recognition of qualifications.

The national action plans for recognition are a collection of best practice, not so good practice, and in some cases even unacceptable practice (see Appendix I for a summary of these). The plans should therefore be further analysed and used for making proposals to improve recognition. A number of countries either have amended their legislation with regard to recognition within the last couple of years or are currently analysing the recognition practices with a view to making adjustments in the legislation or procedures. At the same time, far from all the EHEA countries provided answers to all the points of the Guidelines for National Action Plans for Recognition and therefore in several aspects it is not easy to draw conclusions about the EHEA as a whole.

Analysing the national action plans was a difficult exercise because of their diverse quality. It should also be admitted that while the document is called a "plan", most of the national action plans are actually closer to reports on the status quo and in many cases they contain little information on what the countries intend to do to improve recognition. It should also be borne in mind that some important questions were not included in the Guidelines for National Action Plans for Recognition, for instance within the section on joint degrees, in order not to overburden the exercise.

While some countries submitted national action plans whose structure corresponds to the Guidelines for National Action Plans for Recognition and which comprised all the information requested, others prepared their national action plans without answering a number of questions or changing the structure of the document. In particular, quite a number of countries have dealt with the organisational issues of the legislation review, the planned follow-up activities and recognition procedures at national and institutional level together. When doing so countries often did not provide the expected detail on each of these aspects. In the section on the review of national legislation (1.2), instead of information on this, many countries have just provided a list of national laws and regulations concerning recognition without information on how these legislative documents regulate recognition processes.

One general conclusion from the analysis of the national action plans for recognition is that the recognition practices and even the terminology used vary greatly between the countries and this definitely does not help mutual understanding. This issue has to be discussed further in the ENIC and NARIC networks, since mutual and shared understanding is a cornerstone when discussing joint criteria and procedures for recognition. Very few countries have actually provided information on recognition procedures at higher education institutions and just five countries had actually carried out a survey of institutional practices. Not all countries have mentioned issues such as the time that the recognition procedures take until the recognition statement is issued; few report on an applicant's possibilities to appeal against the recognition statement or on the costs the applicant has to pay for the assessment/ recognition of their qualifications.

As regards information provision, most countries have not distinguished between information provision on their own higher education system for recognition of their own qualifications abroad and the information package for applicants seeking recognition of foreign qualifications.

1. Legislation

1.1. Lisbon Recognition Convention

a. Plan and timetable for ratification if not yet accomplished

Ratification of the Lisbon Recognition Convention

Out of 46 "Bologna" countries, 38 had ratified the Lisbon Recognition Convention at the time when the national action plans were prepared. Germany and Turkey ratified the convention later in 2007, the Netherlands at the beginning of 2008 and Andorra later in 2008. As of December 2008, Belgium and Italy had signed the convention and are currently at different stages of internal arrangements in order to ratify it; Greece and Spain had not signed the convention.

Most of the above countries declare in their national action plans that despite not having ratified the convention, their recognition practices are already in line with its main principles. The good will may be there and indeed there is evidence that, at least in some of the "Bologna" countries that are not yet parties to the convention, the recognition procedures applied may be among the examples of good practice. However, while a voluntary application of the convention may at least partly resolve recognition issues for incoming foreign qualifications, this voluntary compliance will only work "until a problem arises" and, if it arises, there will be no legal obligations on the country to follow the convention. At the same time, the "good behaviour" of the country with regard to incoming students would not help outgoing students. In the case of assessment of qualifications from a country that has not ratified the Lisbon Recognition Convention, the convention principles will naturally not be binding on the competent authorities of other countries. It is nevertheless worth underlining that some of the countries that have signed the Lisbon Recognition Convention but have not ratified it actually disseminate the convention principles and practices.

Summary on ratification

Out of 46 "Bologna" countries, 38 had ratified the Lisbon Recognition Convention at the time when the national action plans were prepared, while Andorra, Germany, the Netherlands and Turkey added their ratifications later. Belgium and Italy have signed the convention but not ratified it; Greece and Spain have not signed the convention.

1.2. Review of national legislation relevant to recognition

Should include:

a. The timetable and organisation of the review of national legislation (including secondary legislation);
b. Steps envisaged as a result of the review, e.g. as regards amending national legislation where needed and an indicative timetable for such amendments.

Could also include:

c. When and how the outcomes of this review will be published;
d. How partners in the European Higher Education Area will be informed of the outcomes.

Review of legislation

This part of the national action plans appears to be somewhat confused. Quite a number of countries have not provided any timetable or details of organisation of the review of national legislation. One reason why no plans to review legislation are presented could be that at the time when these countries prepared their national action plans they had already completed a review of their national legislation. However, another possibility remains that those countries that have not indicated a timetable for review of their legislation are actually not planning to do so.

Another group of countries provides a list of legal acts either specifically concerning recognition or dealing with higher education in general in this section of their national action plans, in most cases with little or no explanation of the way in which these legal acts address the principles of the Lisbon Recognition Convention and its subsidiary texts. Thus, the answers are there, they demonstrate that the legislation of these countries addresses recognition but they are not particularly helpful for any further analysis or comparisons with other countries. A third group of countries describe issues that are more related to recognition criteria and procedures and thus do not address legislation review or plans to make legal changes in this section. All in all, not many countries have provided details about their legislation review or about plans to carry it out. In many cases it also remains unclear how the country in question is able to inform other countries and – maybe more importantly – applicants seeking recognition.

A significant number of countries state that their legislation is already in compliance with the Lisbon Recognition Convention and its supplementary documents. Several of those countries, for example Austria, Estonia, Hungary, Finland, Lithuania, Romania and the Slovak Republic, explicitly state that their national legislation has been adopted or amended on the basis of principles laid down in the Lisbon Recognition Convention and its subsidiary texts. Finland, where incorporation of the convention principles into national legislation has also been

done through several laws adopted or amended after the ratification of the Lisbon Recognition Convention, has, in addition, issued a government document explaining the principles of the legal framework of the convention. Several countries, including Italy, Romania, Slovenia and Spain, mention that legislation they have adopted in recent years simplifies recognition procedures.

It should be mentioned as an example of good practice that several countries are applying the Lisbon Recognition Convention principles to all applicants including those whose qualifications originate from countries that have not ratified the convention. Such developments are clearly in line with the Strategy for the External Dimension of the Bologna Process adopted by the ministers at their London conference in 2007.[20.]

In some cases, while it may be true that there is no explicit contradiction between national legislation and the *letter* of the legal framework of the convention, some doubt remains as to whether there is also no contradiction with the *spirit* of the convention and its subsidiary texts. Alas, the descriptions of recognition procedures at national or institutional level sometimes strengthen this doubt.

The terminology issue

One way in which national practices diverge from the spirit of the Lisbon Recognition Convention is in usage of outdated terminology linked to concepts that are not compatible with the principles of the convention. It is not self-evident that a given national legislation is in compliance with the Lisbon Recognition Convention legal framework if the legislation uses term "nostrification", which is the case in at least five Bologna countries, or "equivalence", which is the case in many more countries, especially those that have not made amendments to legislation concerning recognition after they acceded to the convention. Arguments are sometimes heard from the countries which use the terms "equivalence" or "nostrification" that in their national contexts these words mean the same thing as "recognition".

In whatever meaning the terms may be used locally, in the international context the words "nostrification" and "equivalence" have connotations originating from the assessment procedures of the past (or are they rather still alive?) which were relevant under the old international conventions and agreements on recognition and which are not compatible with the Lisbon Recognition Convention. They indicate a much stronger requirement for similarity between qualifications if foreign qualifications are to be recognised than what is understood by "recognition" and is the key provision of the Lisbon Recognition Convention: that foreign qualifications shall be recognised unless the competent recognition authority can demonstrate that there is a substantial difference between the foreign qualification for which recognition is sought and the corresponding qualification of the host country.

20. Available at: www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/WGR2007/Strategy-for-EHEA-in-global-setting.pdf.

For exactly this reason there is no mention of "nostrification" or "equivalence" either in the Lisbon Recognition Convention itself or in the supplementary legal documents adopted within the legal framework of the convention.

"Nostrification" is a term originating from recognition practices that were widely used several decades ago. Nostrification means acknowledgement of full identity of the foreign qualification in all its aspects – and therefore nostrification often leads either to issuing the appropriate host country's qualification or allowing use of the host country's title.

"Equivalence" is a more recent term denoting a somewhat softer procedure than nostrification but it is not the same as "recognition" in the terminology of the Lisbon Recognition Convention. The explanatory report to the convention provides an explanation of why the word "equivalence" is not used in the Lisbon Recognition Convention:[21]

> Practices concerning the recognition of qualifications have developed considerably over the past decades. Whereas an assessment of foreign qualifications often entailed a detailed comparison of curricula and lists of material studied ("equivalence"), the emphasis has now shifted to a broader comparison of the qualifications earned ("recognition"). Likewise, a tendency has become apparent for formal international regulations to emphasize the procedures and criteria applicable to the process of recognition of foreign qualifications rather than to list or define degrees and diplomas that shall be recognized under the regulation.

Thus, as the Lisbon Recognition Convention was adopted in 1997, it is today twelve years too late to assess foreign qualifications by seeking equivalence … but the terminology and, as a result also the practice, are still alive.

This observation is yet another indication that national legislation should be amended after acceding to international treaties or otherwise the application of the new approach may be hindered in practice. Terminology does matter: if terminology is used that actually denotes outdated procedures that do not ensure "fair recognition" in the letter and spirit of the Lisbon Recognition Convention, the terminology should be changed.

It is therefore highly recommended that countries that have not yet done so adapt their terminology to the terms used in the Lisbon Recognition Convention rather than keep the kind of terminology which – at least in its international meaning – contradicts the principles of the convention.

Summary on legislation review

Quite a number of countries did not provide any timetable or details of organisation of the review of national legislation. A significant number of countries state that

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21. Explanatory Report to the Convention on the Recognition of Qualifications concerning Higher Education in the European Region, Lisbon, 11 April 1997, www.aic.lv/ace/ace_disk/Recognition/leg_aca/ Lisb_exp.pdf.

their legislation is already in compliance with the Lisbon Recognition Convention even if this legislation has not been amended after the countries acceded to the convention. In reality, while there may be no explicit contradiction between national legislation and the *letter* of the convention, there may still be contradiction with the *spirit* of the convention and its supplementary legal documents.

Some countries use outdated terminology which is linked to concepts that are not compatible with the principles of the Lisbon Recognition Convention. Thus, at least five countries still use the term "nostrification" which is linked to a recognition concept seeking full identity of the foreign qualification, or the term "equivalence". Neither of these terms is used in the Lisbon Recognition Convention or its subsidiary texts because they are linked with outdated principles and methodology where the main focus of assessment was on a detailed comparison of curricula and even lists of material studied.

Legal and institutional autonomy issues in the implementation of the Lisbon Recognition Convention

It is interesting that this point arises and is being intensively discussed, as theoretically there should be no problems at all. Since the Lisbon Recognition Convention is an international treaty, once a country becomes party to the convention, that is, ratifies it, the convention should take precedence over national legislation. In reality, however, the national action plans for recognition demonstrate something else (and the same is often heard at international meetings where recognition is discussed): the superiority of international over national legislation in practice does not work so smoothly in all countries.

Two kinds of difficulty are mentioned most often. The first one relates to those cases where the national legislation is in contradiction with the legal framework of the Lisbon Recognition Convention. Most typically this may happen if the contradictory clauses already existed in the national legislation before the country in question acceded to the convention. In these cases the natural solution would be to amend the national legislation accordingly in order to bring it into line with the Lisbon Recognition Convention. There is a large group of countries that have done so or are planning to do so. However, there are also examples of the opposite, that is, cases where national legislation has been amended or replaced with new generation legislation without respect to international legislation – in which case the contradictions may become even deeper.

The other type of hindrance to the implementation of the Lisbon Recognition Convention seems to be linked to the interpretation (or rather misinterpretation) of the key principle of institutional autonomy. The autonomy of higher education institutions is a cornerstone of the heritage and practice of higher education in Europe, and it is one of the fundamental principles of the EHEA. It certainly does not mean, however, that higher education institutions have the liberty to ignore the laws or international treaties signed by the state – and the Lisbon Recognition

Convention is one. Still, where this type of interpretation takes place, the various formulations in national action plans have approximately the same overall meaning: since the recognition decisions are taken by the higher education institutions and since these institutions are autonomous, the state cannot ensure that the principles or procedures stipulated in the legal framework of the Lisbon Recognition Convention are followed. This kind of answer shows that countries actually do not fulfil the requirements of the Lisbon Recognition Convention, which obliges the central authorities of the state party to the convention to take all possible steps to encourage the favourable consideration and application of the convention provisions in higher education institutions.[22]

Several different approaches regarding the legal aspects of implementation of the Lisbon Recognition Convention in relation to national legislation and institutional autonomy have been observed.

The most widespread approach seems to be the one where the ENIC/NARIC assesses the foreign qualification and issues a statement which is a recommendation to the autonomous higher education institutions. The universities indeed make their autonomous decisions on recognition but, since they should be aware of the international legislation and often rely on the professionalism of their national ENIC/NARIC,[23] they are expected to follow the principles of the Lisbon Recognition Convention.

A sample of unacceptable practice is the "hands off" approach, where it is considered that due to institutional autonomy it is not possible to request that higher education institutions follow the principles of the Lisbon Recognition Convention in their recognition practices. In a couple of cases this type of interpretation goes even further, claiming that the state has no right even to ask for information about the actual recognition practices inside higher education institutions or that even advising the higher education institutions on recognition can be problematic because of autonomy.

The "centralised" approach is used by some countries and there the actions and responsibilities are reversed. A central body – the ministry, the minister, another senior ministry official personally or a ministry-approved committee – makes decisions on recognition. Recognition decisions may in this case be prepared either by the higher education institutions or the ENIC/NARICs or ad hoc committees. A couple of countries consider this type of approach as a solution to the autonomy issue. As an extreme example of this approach, in one country, higher education institutions have no mandate or say in recognition decisions at all.

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22. Cf. Article II.1 of the Lisbon Recognition Convention available at: http://conventions.coe.int/Treaty/en/Treaties/Html/165.htm.

23. In the EU, EEA and EU candidate countries the recognition centres belong to both ENIC and NARIC networks. The Bologna Process also covers countries outside the EU and the national recognition centres of these countries belong to the ENIC network only. For the sake of simplicity, reference is to ENIC/NARIC centres throughout the text.

There are three interesting variations of the most widespread approach described above. One of them involves some "power play". Autonomous higher education institutions take the decisions but inspectorates, ministries or other bodies that monitor observation of the law in higher education institutions check the implementation of the convention.

In the second variation of the most widespread approach a legal solution is sought: the principles of the Lisbon Recognition Convention are transposed into national legislation. While universities are autonomous, they still have to respect the law; therefore this approach ensures that the recognition decisions should be in line with the convention. This practice, which is followed in several countries, clearly shows that international legislation is not always seen as taking priority over national legislation in practice – hence the described measures.

The third variation of the widespread approach seems to be the best practice. It is related to quality assurance: since fair recognition of qualifications is considered to be part of the overall quality assurance system of the higher education institution, the institutional recognition procedures and implementation of the Lisbon Recognition Convention is assessed at the periodic quality reviews, audits or accreditation.

Summary on legal and autonomy-related implementation difficulties

In some cases countries report problems in implementing the Lisbon Recognition Convention because their national legislation contradicts the legal framework of the convention. This indicates that the country should either amend its legislation or ensure that the precedence of the international legislation is observed.

Some countries report that since the recognition decisions are taken by the higher education institutions and since these institutions are autonomous, the state cannot ensure that the principles of the Lisbon Recognition Convention are followed. Thus, these countries actually do not fulfil the requirements of the convention to take all possible steps to apply the convention provisions in higher education institutions. This is clearly not acceptable practice.

The best solution to this issue is making the recognition of qualifications in higher education institutions part of quality assurance, which will then assess compliance with the Lisbon Recognition Convention. Another solution is that the state bodies that monitor observation of the law in higher education institutions also monitor observation of the Lisbon Recognition Convention principles. A less favourable solution mentioned by some countries is that recognition decisions are made by a central body: the minister or someone in his/her name and not by higher education institutions.

Follow-up measures planned

Not many countries are planning to amend or draft legislation. The following are some examples of countries planning to do so.

In Malta, a process has been initiated to streamline and simplify legislation and this process will address both academic and professional recognition. A working group established in 2006 for the review of legislation in Albania has proposed amendments to two national regulations in order to ensure compliance with the Council of Europe/UNESCO Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study (hereafter the Recommendation on Criteria and Procedures; see Appendices III and IV). Armenia stated that it had no specific legislation on recognition so far and therefore the Lisbon Recognition Convention is being applied directly, but the Armenian Government has prepared amendments to legislation in the course of 2007-08 and has submitted them for adoption. In Latvia the legislation is in line with the principles of the Lisbon Recognition Convention but those principles have so far not been explicitly mentioned. For this reason, the principles of the Lisbon Recognition Convention are listed in the draft law for higher education which has been submitted to the parliament for adoption. Bosnia and Herzegovina states that due to different legislation in the different parts of the country and lack of a state-level higher education law,[24] the procedures and criteria are not fully in compliance with Recommendation on Criteria and Procedures, and therefore the state level recommends following the principles laid down in international legislation.

In most countries the follow-up procedures planned do not involve amendments of legislation but rather information and dissemination measures.

A number of countries, including those known for having the best recognition practices and which therefore often share their experiences with others, indicate that different stakeholders involved in the assessment and recognition of qualifications still need more information on the principles of the Lisbon Recognition Convention. It is specifically underlined in several national action plans that training in the practical application of the convention principles is still needed and the ENIC/NARICs of these countries therefore plan more dissemination and training events for higher education institutions, employers and other parties involved in recognition.

Austria considers that its legislation is in compliance with the Lisbon Recognition Convention legal framework and plans to inform partners in the EHEA by publishing the new amendments and preparing English translations of the relevant legislation, as does Croatia, where the amendments to legislation took effect at the end of 2006.

Summary on follow-up measures

In most countries the follow-up procedures planned do not involve amendments of legislation but rather information and dissemination measures.

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24. A state-level law on higher education was adopted in Bosnia and Herzegovina after its NAP was written.

1.3. Bilateral or regional recognition agreements

Conformity with the principles of the Lisbon Recognition Convention

Regarding the bilateral recognition agreements, the main findings are as follows. Far from all countries have bilateral recognition agreements with other countries. Where a country has such agreements, the number of agreements is usually three to four, although in some cases the number of agreements is greater. Thus, Germany, the Czech Republic and Slovenia have more than 10 bilateral agreements each, Romania has 8, Poland has 7 and the Slovak Republic and Albania have 5 bilateral agreements each.

Bilateral recognition agreements are often concluded between geographically close countries or between countries with a common history. Examples of this phenomenon are the agreements between the Nordic countries, the ones between the Baltic countries and at least some of the agreements concluded by such countries as Austria, Croatia, the Czech Republic, Germany, Hungary, Italy, Liechtenstein, Romania, Slovakia and Switzerland. The Russian Federation sees bilateral agreements as part of its plan to increase the export of its higher education services. In the above cases the bilateral agreements usually go further than the Lisbon Recognition Convention: in some cases the agreements include notions on how particular qualifications of one party of the agreement should be recognised in another party.

Another group of bilateral recognition agreements is those which provide legal grounds for mutual recognition between countries that are not part of the European region and are therefore not covered by the Lisbon Recognition Convention. Several "Bologna" countries have concluded bilateral agreements with China, some Latin American countries, Egypt, Kazakhstan, Kyrgyzstan, Iran, Uzbekistan, Turkmenistan and others.

Conformity of bilateral agreements with the principles
of the Lisbon Recognition Convention

Most countries state that their bilateral recognition agreements are in conformity with the principles of the Lisbon Recognition Convention. Yet, in several cases, countries have indicated that bilateral agreements are becoming outdated and should therefore be revised – which may partly be caused by the rapid changes in qualifications systems within the Bologna Process.

Austria notes that, as its policy is to support the implementation of the Lisbon Recognition Convention in the countries involved in the Bologna Process, it is not planning to conclude further bilateral agreements with states parties to the Lisbon Recognition Convention. Instead, it is more useful to develop bilateral recommendations with these countries, working together with their relevant institutions and using the convention as the only legal basis.

Summary on bilateral agreements

Not all countries have bilateral recognition agreements. The number of bilateral agreements is typically 5-10. Bilateral recognition agreements are often concluded either among geographically/historically close countries or with countries that are not part of the European region and are therefore not covered by the Lisbon Recognition Convention.

It is worth considering the proposal not to conclude further bilateral agreements between states parties to the Lisbon Recognition Convention in order to support implementation of the convention in the countries involved in the Bologna Process.

2. Recognition practice

2.1. Criteria and procedures

a. Overview of the practice of competent recognition authorities in applying the Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study.

b. Measures to improve implementation.

c. Overview of the time required to process applications for recognition and measures to improve this time.

Overview of the practice of competent recognition authorities

Recognition procedures

With few exceptions, all the countries declare that the recognition criteria and procedures they use are in compliance with the Council of Europe/UNESCO Recommendation on Criteria and Procedures. Among the exceptions are Spain, which does not claim compliance with the recommendation, and Bosnia and Herzegovina, which has said that due to different legislation in the different parts of the country, the procedures and criteria are not fully in compliance with recommendation and therefore the state level recommends following the principles laid down in international legislation. Some countries, for example Bulgaria, link their updating of the criteria for recognition with the latest developments within the Bologna Process.

Authenticity and translations of documents

While we do not question the principle that documents presented for recognition should be authentic and that fraud should be eradicated, practices in some countries nevertheless seem to be exaggerated. Requesting that all documents to be presented are officially translated and have an "apostille" is burdensome to the applicants but, on the other hand, a verbatim "official" translation may appear misleading from a recognition point of view. Albania, for instance, therefore states that the confirmation of authenticity can be realised through direct correspondence with the institution of origin. In Hungary, half of the institutions do not require translations if the documents are in English or German, while Italy recommends that institutions accept documents in English, French, Latin and Spanish.

Comparing a foreign qualification with the relevant host country's qualification

With few exceptions, the recognition procedures include comparing the foreign qualification in question with the relevant qualification in the host country. It is not the case, for example, in France, where so far foreign qualifications are not compared with the relevant French qualification. However, France is currently attempting to introduce such practice. Comparing a foreign qualification to the host country's qualification which it is going to substitute is a logical approach. However, it can create problems in cases where there is no host country qualification with which to compare the foreign qualification in question. Thus, one country stated that when a relevant qualification to be used as a prototype cannot be found in the institution to which the application has been addressed or in other institutions of the host country, recognition is refused. The applicant can then appeal and after appeal the Ministry of Education should decide. While such cases might be relatively rare, this does not appear to be good practice because it actually means denying recognition without any assessment of the foreign qualification. This practice thus contradicts one of the main principles of the Lisbon Recognition Convention: applicants' right to a fair assessment of their qualification. Spain has a procedure for recognising foreign higher education qualifications which provides a clear equivalent to Spanish academic degrees. Under the 2004 regulation, it is possible to recognise a foreign degree also as a general degree in the Spanish system without comparing it to a particular Spanish qualification.

Under the new recognition legislation the procedures in Slovenia have moved away from requiring that the foreign qualification is equivalent to the relevant home qualification in all aspects towards comparing only those aspects relevant to the right which the holder of the qualification is trying to exercise in Slovenia.

The most detailed approach to comparison to a qualification in the host country's system is perhaps the United Kingdom case. The UK ENIC/NARIC has prepared a code of practice which advises on the criteria and procedures for the recognition of international qualifications and skills. The detailed procedure called "band framework" leads to location of the foreign qualification in the 17-level UK system comprising academic and vocational qualifications at all levels of education. A rather similar approach is used by Ireland where the foreign qualification is related to the Irish qualifications framework.

In Ukraine the foreign programme is compared to the domestic one in order to establish the level of correspondence according to the Ukrainian state standards and Cabinet regulation.

A very special way of comparison with the host country's qualification is applied in one country where the recognition process involves a two-step assessment of the higher education institution and programme from where the foreign qualification in question originates, as the following quote from the national action plan shows:

1. A review of the foreign higher education institution by a scientific committee of university professors to determine whether it is "essentially equivalent" to that country's higher education institutions.

2. An assessment of the particular Department and the program the student attended is made considering parameters such as admission requirements, number of professors who are PhD holders, teaching and examination procedures and degree titles awarded.

Following these two steps, the academic qualifications are considered either as "equivalent" or as "equivalent and correspondent".

This kind of practice could perhaps be understandable some 10-15 years ago, when the quality assurance systems in Europe were not yet established. Today, quality assurance systems have been established throughout the EHEA, and countries are increasingly building trust between their educational systems on the basis of national quality assurance and European co-operation in quality assurance through the European Association for Quality Assurance in Higher Education (ENQA), the European Consortium for Accreditation (ECA) and other networks of quality assurance. For the above reasons, attempting to assess the quality of a foreign higher education institution from a distance (and probably using limited information) rather than consulting the national quality assurance results in the country that has issued the qualification does not seem to be acceptable practice within the EHEA.

Different recognition procedures for different types of qualification

In some countries there are separate avenues for different kinds of qualifications, for instance according to profiles or levels.

In some countries there may be different avenues of recognition depending on the *profile* of the qualification. In other words, there can be different competent authorities (and modified procedures) for "academic" and "applied/professional" qualifications.

Some countries have established different avenues of recognition for different *levels* of degrees. First of all, some countries treat doctoral degrees as "scientific" degrees separately from the "academic" bachelor and master degrees. Others treat the "postgraduate" (doctoral and master degrees) separately from bachelor degrees.

Finally, some countries, for example Cyprus, separate "Bologna" degrees from "pre-Bologna" integrated degrees awarded after completion of "long" programmes, and have separate procedures for these two groups. In the French Community of Belgium, for instance, the concept of "level equivalence" with generic academic bachelor and master degrees was introduced in 2004. This type of recognition is applied in cases where the studies undertaken abroad have been at the bachelor or master level but their contents do not correspond to any programme in the French Community of Belgium.

An example of quite diverse procedures is Albania where, in addition to treating doctoral degrees separately from other qualifications, there are different competent

authorities looking at cases where the master degree has been obtained in the same field (and institution) which awarded bachelor degree, and cases where the master degree is in a different field or has been awarded by a different institution.

Partial recognition

In many countries in cases where full recognition cannot be granted because there are substantial differences, it is possible to have partial recognition. As an alternative to partial recognition some countries suggest compensatory measures that would enable applicants to meet requirements for recognition at the desired level. It is believed that granting partial recognition is very common practice in most countries, and therefore countries probably did not consider it necessary to specifically mention it in their national action plans. The possibilities of partial recognition/compensatory measures are specifically mentioned by, for example, Belgium (French Community), the Czech Republic and Latvia.

Is granting partial recognition good or bad practice? It is impossible to judge without seeing examples of cases. Of course, for the applicant, partial recognition or imposing compensatory measures is better than non-recognition. However, unlike the recognition of professional qualifications in the EU, where the EU Directive 2005/36/EC sets out some regulations on the application of compensatory measures, there are no international regulations for this academic recognition issue. So the question that should be asked when compensatory measures or partial recognition are applied is this: are those measures applied because some important learning outcomes of the foreign qualification are missing and these prevent the applicant from pursuing the intended learning or professional activities, or are they applied to make the content of studies that the foreign applicant has taken identical to the ones contained in the relevant local qualification?

Links between procedures for academic and professional recognition

While not all countries mention it explicitly, there is a feeling that, as underlined, for example, by Estonia, Georgia, Greece and Sweden, academic recognition often has consequences in de facto professional recognition, that is, the recognition for the non-regulated part of the labour market. Spain in turn reports that academic recognition is easier if the applicant already has professional recognition.

A rather strange finding is that some countries require full academic recognition (including comparison of programmes carried out by higher education institutions) when the applicant intends to enter a regulated profession. While the issue is outside the scope of the present report, it should be underlined that such developments are not in line with one of the general principles of the EU directive on the recognition of professional qualifications. The directive states that a professional who had the full right to practise in the member state of origin should also be given the same rights in the host member state rather than go into detailed comparison of the academic content of training.

It is important to note that as far as possible the procedures for recognition for academic and professional purposes for the non-regulated part of the labour market should be coherent – first of all, for the sake of applicants. Having two sets of incompatible procedures also looks strange given that the majority of ENIC/NARICs also have functions in professional recognition. In the EU countries they usually serve as contact points for professional recognition, and in other countries they may have various functions in professional recognition – from advisory bodies to competent authorities.

Recognition in cases where evidence is incomplete or lacking

In cases where evidence is lacking, the assessment of an applicant's qualifications is difficult and requires good will. Nevertheless, there seems to be a growing number of countries that attempt to assess qualifications even in these cases. Denmark is one example of the countries where the ENIC/NARIC will assess applications from people lacking documentation of their qualification. If the applicant cannot provide a transcript, but only has the diploma, the foreign qualification will only be compared with a general level of the Danish education system.

Recognition procedure in two stages – but which stages?

It has become quite common that the overall procedure from the moment the holder of a foreign qualification submits his/her application to the moment a decision on recognition is taken includes two main stages. The national action plans demonstrate that these two stages can be quite different.

Recommendation followed by a decision on recognition

In many cases, the first stage ends with the issuing of a statement on recognition which is not yet a decision and is therefore not binding. The recognition statement then serves as a recommendation to the competent authority which takes the decision. In quite a number of countries the recommendation is issued by the ENIC/NARIC and the final recognition decision is taken by the higher education institution (for further studies) or by the employer (for employment in non-regulated professions).

There can be variations to the recommendation–decision two-stage procedure: in some countries it is an ad hoc committee of experts (and a higher education institution in one country) and not the ENIC/NARIC that prepares the recommendation. The decision in some countries may be taken by the minister (vice-minister, ministry), in other countries by an ad hoc committee of experts and in some by the ENIC/NARIC.

As can be seen from the national action plans, the two-stage procedure can involve stages other than those of recommendation and decision and these can vary substantially between countries. The various first and second stages of the two-stage procedure are summarised in Table 1.

Table 1. Two-stage recognition procedure as described in the national action plans for recognition submitted by different countries[25]

	Stage I	Stage II
A	Recommendation on recognition	Recognition decision
B	Formal recognition	Recognition for continuation of studies
C	Recognition of level	Recognition of comparability
D	Recognition positioning in the home system	Recognition statement establishing equivalence
E	Recognition for further studies	Establishing equivalence with issuing host country's degree
F	Establishing equivalence	Establishing comparability (with all legal rights)

Some differences from the "typical" recommendation–decision procedure in case A seem to be obvious.

In case B the first stage ends with "formal recognition". Thus, the result of the first stage is already a decision. This decision probably gives some rights to the holder and is not a recommendatory statement as in the "typical" procedure.

In case C there are also two recognition decisions. The first acknowledges the level of the foreign qualification without comparison to a particular qualification of the host country and may also give some rights to the holder. With the introduction of the Bologna three-cycle system, "level recognition" without a detailed comparison to a particular qualification of the host country seems to have become more widespread. In the second stage the foreign qualification may be recognised as comparable to a particular qualification of the host system. In principle the "formal" or "level" recognition may fit some of the needs of the qualification holder. However, taking into account that in some countries there is still a tendency to seek full identity of the foreign qualification to the relevant home qualification, the first stages in cases B and C may also be used to say "not recognised" in a polite manner. It would therefore be important with regard to cases B and C to clarify what is actually the function of the two different levels of recognition, what rights the first stage of recognition actually gives to the holder and how similar the qualification must be to the relevant host country's qualification to reach the kind of recognition foreseen in stage II.

In cases D, E and F countries in their national action plans use the term "equivalence", which has already been discussed in the section 1.2 on the review of national legislation relevant to recognition.

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25. The names of the stages have been taken from the national plans submitted by countries.

In cases E and F the result of the first stage seems to correspond to the result of stage II of cases A, B, C and D. Stage II of cases E and F apparently is something even more. In case E, the second stage of recognition leads to issuing the host country's qualification.

Regarding case F, "equivalence" is already established in stage I but only in stage II does the holder of a foreign qualification gain the full legal rights. In any case, the fact that "equivalence" in different countries may appear either as a result of the first or the second stage of the recognition procedures clearly demonstrates that the discussion should continue at European level to clarify the terminology used and the philosophy followed.

Summary on recognition procedures

A conclusion from the above is that there should be a discussion at European level to clarify the terminology used and the stages of the recognition procedure with a view to agreeing upon coherent and mutually understandable procedures. Besides the representatives of the ENIC/NARIC the discussion should also involve policy makers and representatives of higher education institutions, as the national recognition procedures are often regulated in legislation and as the higher education institutions are often involved in the last stage of recognition.

Recognition criteria

The criteria used and the relative importance of different criteria vary significantly from country to country. Criteria may vary from comparing learning outcomes to attempting to assess the teaching staff of an institution in another country.

Some examples of contemporary approaches will be described first.

Taking into account differences in the educational systems

The Flemish Community of Belgium, "the former Yugoslav Republic of Macedonia" and several other countries state that they acknowledge differences between education systems and take them into account in their assessment of foreign qualifications.

Relying on quality and trusting quality assurance in other countries

It can be seen that one of the common tendencies is using quality as a criterion and trusting the quality assurance in the country of origin. It becomes a norm that quality assurance (resulting in national recognition) of the programme and/or institution from which the qualification originates is a necessary precondition for the recognition of individual qualifications. This approach leads to the principle stated clearly by Austria: "rely on the recognition in the country of origin".

Assessing learning outcomes wherever possible

Several countries, for example Croatia, Denmark, Latvia, Malta and Norway, emphasise that, whenever possible, recognition is based upon a comparison of learning outcomes or competences. Even more, one country has stated that recognition can only be denied if there is clear evidence of substantial differences in learning outcomes. Some countries emphasise other elements of qualifications frameworks, such as profile.

Attempting to take into account prior learning

Several countries, for example Denmark, France and Norway, state that they attempt where possible to evaluate and take into account prior learning or any learning for which the applicants lack documentary evidence.

Taking into account the previous recognition practice of similar qualifications

This is explicitly mentioned by, for example, the Czech Republic, Italy, Lithuania and "the former Yugoslav Republic of Macedonia". Countries like Denmark, the Netherlands, Norway, Ireland, Malta, Sweden and the United Kingdom have established databases on previous recognition decisions, and more are planning to do so.

The following criteria for recognition are most often mentioned:

− the recognition or quality assurance/accreditation status of the institution/ qualification in the country of origin;
− the level of the qualification;
− the learning outcomes/stipulated aims of the programme;
− the content of the curriculum;
− the rights of the qualification holder in the home country;
− the conditions for access to the programme;
− the length/duration/volume of the programme;
− the purposes for which recognition is sought.

There are also other criteria that are mentioned less frequently:

− the level of the institution;
− the profile of the institution;
− the number of study hours covered by the programme;
− the traineeships, practical exercises, dissertations and theses;
− the examination results obtained;
− the accreditation or recognition by the foreign authorities;
− the professional recognition of the study programme in the home country;

−   the relevant professional experience.

Some of these criteria raise further questions. It is not absolutely clear what the "level of the institution" means. It may be just an issue of wording, but it also might be related to putting a professional higher education institution at a different "level" compared to a university – while in fact both may award qualifications at the same level. Using the number of study hours covered by the programme as a recognition criterion is an old-fashioned approach from the times when every detail of the programmes was compared.

Summary on recognition criteria

The criteria used and the relative importance of different criteria vary significantly from country to country. Criteria may vary from comparing learning outcomes to attempting to assess teaching staff of an institution in another country. The contemporary approaches include, for example, taking into account differences in the educational systems, counting on quality and trusting quality assurance in other countries, assessing learning outcomes wherever possible, attempting to take into account prior learning and taking into account the previous recognition practices in similar cases. Adding the purposes for which recognition is sought and study workload seems to be an up-to-date approach to recognition.

However, a number of other countries start by mentioning such criteria as content of the curriculum and length/duration of the programme instead, which seem to represent quite backward-looking approaches.

Measures to improve implementation

Not all countries plan any measures to improve recognition practices as a result of the legislation and procedures' review.

The country that is planning the greatest number of activities is Albania. It plans to reduce the number of the documents to be legalised, to ensure possibilities for applicants to appeal against recognition decisions and to improve the procedures for appeal, to reduce by half the fees for recognition and to further reduce the time needed to process applications for recognition (even if the time is in line with the convention already). Poland states that it will prepare new rules for nostrification.

Many countries, including a number of those who are known for the best recognition practices, plan to continue to disseminate information on recognition criteria and procedures among all stakeholders and to provide advice and training to the relevant staff of the higher education institutions, as well as to employers, namely, to those who in most cases are actually the competent recognition authorities. Some countries state that it is especially necessary for private institutions; others have so far provided such information to universities only and are now planning also to include other higher education institutions.

Bulgaria, Croatia and others plan to update the criteria for recognition according to the latest developments in the Bologna Process and in the education field in general. Croatia also plans to eliminate requirements leading to undue complications in the procedure.

Several countries plan to establish databases of recognition decisions with a view to simplifying procedures in the future, while Ireland, Malta and some others will develop databases on qualifications systems abroad and further strengthen the ENIC/NARIC.

Some countries, for example Italy and Norway, plan to monitor the drawing up and implementation of institutional regulations with special reference to academic recognition and the application of the Lisbon Recognition Convention. Norway will also make it compulsory to include recognition procedures in the formal quality assurance system of all higher education institutions. Italy, which has stressed the importance of discussing the substantial differences issue internationally,[26] also plans an intensive national discussion on cases of substantial differences.

Summary on measures to improve implementation

Not all countries plan any measures to improve recognition practices as a result of the review of legislation and procedures. The main measures countries plan in order to improve procedures and criteria are: ensuring possibilities for applicants to appeal, dissemination of information on recognition criteria and procedures among all stakeholders, updating the criteria for recognition according to the latest developments in the Bologna Process, establishing databases of recognition decisions, assisting higher education institutions and monitoring the drawing up and implementation of institutional regulations. It should be underlined that the same countries that already demonstrate the best recognition practices also plan most measures for improvement.

Overview of the time required to process applications

The time required for recognition generally does not seem to be worrying. Quite a number of respondents, among them Albania, the Flemish Community of Belgium, France, Italy and Poland mention the three-month time limit.

There are also a number of countries that do it in a substantially shorter time: Georgia in 15-30 days, Malta in not more than 15 working days, Iceland in 15 days (but that concerns procedures up to receiving ENIC/NARIC advice), Denmark in 26 days (and the time is still decreasing) and Estonia in 30 days. Latvia, in most cases, aims for 15 days but in more complicated cases this may take up to three months (in theory, the law allows for six months). The Czech Republic, Lithuania, Liechtenstein

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26. An ENIC/NARIC working party, with administrative support from the Council of Europe, was appointed in early 2006 at the suggestion of Italy. The issue of substantial differences was a major topic at the annual ENIC/NARIC meetings in 2006, 2007 and 2008, and a book on substantial differences is forthcoming in the Council of Europe Higher Education Series.

and Switzerland usually do not require more than one month with an extension up to three months if necessary. Norway needs 2.6 months on average and Hungary and "the former Yugoslav Republic of Macedonia" normally take up to two months. In Hungary extension is possible up to three months.

In Slovenia and Bosnia and Herzegovina the desired time for recognition theoretically is two months; however, the recognition decision is not issued in this time in all cases (half of cases in Slovenia). Cyprus and Sweden aim at three months, but in Sweden 90% of cases are already completed within this time. The procedure still takes four months in Armenia.

Summary on the time required for processing applications for recognition

Overall, it seems that in most cases the time required for processing applications for recognition is within a three-month limit and that the time is still being reduced. It should, however, be noted that not all countries have answered the question regarding the duration of recognition procedures.

2.2. Joint degrees

a. Overview of the legal provisions concerning the recognition of joint degrees.

b. Amendments to remove legal obstacles or to establish legal provision favouring the recognition of joint degrees.

c. Beyond legal provision, suggestion of policy measures to ensure the recognition of joint degrees.

d. Overview of double and multiple degrees and policy measures to encourage the recognition of such degrees.

Legislation relating to joint degrees

It is evident from the national action plans for recognition that within the past couple of years legislation has been reviewed in a number of countries with regard to the awarding and recognition of joint degrees. Since 2005 there has been progress in establishing joint programmes and awarding joint degrees. In the two-year period between the Bergen and London ministerial conferences a number of countries changed their legislation with regard to joint degrees. Laws explicitly address joint degrees in, for example, Austria, Belgium, the Czech Republic, Finland, France, Greece, Iceland, Ireland, Italy, Norway, Poland, Romania, Serbia and Spain, making it possible to award and recognise joint degrees.

Another group of countries, such as Croatia, Cyprus, Denmark, Georgia, Germany, Liechtenstein and Switzerland, state that while the law does not specifically mention joint degrees, there are no legal obstacles for their establishment either. Previous

experience with joint degrees, however,[27] shows that no mention of joint degrees in the legislation does not necessarily mean that there are no legal obstacles to awarding them. Obstacles to joint degrees often arise from regulations that have been prepared without regard to joint degrees and are not directed against joint degrees specifically. They probably date from a time when joint degrees were not yet an issue. For instance, these can be regulations on the minimum part of the programme to be studied at the home institution a requirement that the final thesis has to be written at the "home" institution and regulations on issuing state recognised diplomas (can foreign rectors/deans put their signature on the diploma?). In some countries even the officially approved layout of the state-recognised diplomas and many other seemingly simple formal issues may become obstacles to joint degrees.

Thus, for example in Latvia and the Slovak Republic, there are, in principle, no legal obstacles, yet the law restricts the text that may be written in the certificate. In Estonia, joint programmes and the award of joint diplomas are allowed, but the joint degrees awarded are not officially recognised by the state. In Latvia and Sweden it is legally possible to establish joint programmes but joint degrees are still impossible to award.

Some other countries, for example Bulgaria, Cyprus, Malta and Slovenia, report that their legislation allows the recognition of joint degrees but do not mention any legal possibilities to award joint degrees. Bulgaria and Malta underline that universities are working hard to establish joint degree co-operation.

It seems that, similar to several years ago, some countries that have no possibility of awarding joint degrees use joint programmes as the way out. The programmes are established and carried out jointly but upon completion of studies each higher education institution awards its own degree to its "own" students. It should also be underlined that in their national action plans countries often do not distinguish between co-operation on joint programmes and awarding degrees jointly. This is probably one of the reasons for optimism when stating that while the legislation does not mention joint degrees, they are still possible.

In several countries, for example Austria, Denmark, Finland, Germany, Norway and Spain, the ministry, the rectors' conference, the ENIC/NARIC, or these organisations in co-operation have prepared guidelines for establishing joint programmes. Ireland and Norway have established procedures for joint quality assurance of the joint programmes.

It is specifically mentioned in several national action plans that higher education institutions are encouraged to establish joint degrees. This is the case in Austria, the Czech Republic, Denmark, Finland, France, Iceland, Italy, Norway, Poland, Sweden and Switzerland. Some of these countries also mention financial incentives:

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27. Tauch, C. and Rauhvargers, A. (2002), "Survey on master degrees and joint degrees in Europe". European University Association, Geneva/Brussels, 45 pp., available at: www.eua.be/eua/jsp/en/upload/ Survey_Master_Joint_degrees_en.1068806054837.pdf.

the Czech Republic, France and Italy for joint degrees in general whereas Switzerland specifically mentions incentives for joint doctoral programmes. The answers from countries on encouraging the establishment of joint degrees or financial incentives for joint degree co-operation, however, do not allow the drawing of any overall conclusions on these issues because no questions were asked in the template for the national action plans concerning encouraging or providing financial incentives for joint degrees.

There is also a group of countries that are preparing changes to legislation with a view to addressing joint degrees, among them Bosnia and Herzegovina, Denmark, Liechtenstein, Latvia and "the former Yugoslav Republic of Macedonia".

Obstacles

The most frequently mentioned obstacles to the award and recognition of joint degrees are not new. They are:

− lack of national legal regulations on joint degrees;
− the text on the diploma is regulated by legislation and it excludes the possibility of awarding degrees jointly.

Germany and several other countries underline the need for more international co-operation in the quality assurance of joint programmes.

Typical conditions for recognition

The conditions for recognition of foreign joint degrees most often applied by the countries are actually those included in the Council of Europe/UNESCO Recommendation on the Recognition of Joint Degrees:[28]

− all parts of joint degree must have been subject to transparent quality assessment;
− all participating higher education institutions should be recognised institutions;
− all parts of the joint degree must belong to a national educational system.

Some countries also require that a similar programme exist in their country.

Summary on joint degrees

There has been progress in the area of establishing joint programmes and awarding joint degrees since 2005. In the two-year period between the Bergen and London ministerial conferences a number of countries have changed their legislation with regard to joint degrees; others have started joint programmes in practice. The resulting situation is that in most countries either the award and recognition of joint degrees is explicitly allowed and encouraged by national legislation or there is no

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28. Recommendation on the recognition of joint degrees, 2004, www.enic-naric.net/documents/recommendation-joint-degrees-2004.en.pdf.

explicit mention of joint degrees in the legislation but the legislation does not hinder the establishment of at least joint programmes, though the actual award of joint degrees may be more problematic.

2.3. Overview of institutional practice

Consider what measures have been or should be taken to allow national authorities to know:

a. whether higher education institutions and other competent recognition authorities comply with the Lisbon Recognition Convention and with national laws;

b. what measures could be taken if given institutions or authorities were shown consistently not to apply the Convention and/or relevant national laws.

Institutional practices

This section of the national action plans is one of the least informative: several countries just report that they do not have any information on institutional practices, sometimes mentioning institutional autonomy as a reason (e.g. Albania). On the other hand, in Slovenia the ENIC/NARIC keeps records of all the recognition statements. In the French and Flemish communities of Belgium as well as in France no information on institutional practices is available yet.

Many countries only describe the measures that the ENIC/NARIC takes in order to assist institutions (websites, databases, seminars, hotlines, etc.). Austria relies on counselling the institutions and authorities and not on influencing institutional action through legal remedies. Turkey has no information on this point because higher education institutions have no mandate or competence for the recognition of foreign higher education qualifications. Ukraine gives no information because institutions are only involved in cases where the ministry considers that institutional level involvement is needed. In some countries, for example Romania and Spain, institutions only deal with recognition of credits. In Bulgaria, higher education institutions do not decide on recognition either, and the same is true for Croatia, but in the latter country the ENIC/NARIC will in the future no longer be responsible for final decisions.

Just a few countries, for example the Czech Republic, Denmark, Hungary, Latvia, Norway and Poland, have actually carried out institutional reviews. However, even the countries that have completed surveys do not always disclose the findings but rather state that there will be action taken to improve the situation or to assist the institutions on the basis of the results (e.g. Hungary, Poland).

In the Czech Republic, according to its statement, higher education institutions act in line with the basic steps proposed in the recommendation. In Denmark, Estonia, Malta, the Slovak Republic and Sweden, where the Lisbon Recognition Convention and its subsidiary texts are embedded into the national legislation, the appropriate

bodies can and do check whether the higher education institutions stick to the legal regulations – including the Lisbon Recognition Convention and its supplementary texts. For instance, in Estonia it is done by the ministry and in Sweden by the National Agency of Higher Education. In Iceland the cases of non-compliance with the Lisbon Recognition Convention legal framework would be mentioned in the accreditation report and the higher education institution in question would be given a certain time limit to correct its procedures.

Ireland has experienced a large growth in immigration, and therefore the issue of recognition of foreign qualifications has become a much more prominent and pressing one for higher education institutions. Recognition procedures in institutions have become quite formalised, standardised and well documented, with institutions applying common procedures and processes in recognising foreign qualifications.

In Switzerland, with its positioning of the ENIC/NARIC within the rectors' conference, higher education institutions and recognition authorities collaborate very closely. The recognition bodies meet regularly to discuss their recognition practices. Together with the Swiss ENIC/NARIC, the Swiss rectors' conference (CRUS) commission for admission and equivalence supports and monitors the implementation of the convention and discusses any problems arising.

The United Kingdom states that there is no evidence to suggest that individual institutions are in breach of convention requirements. Under the Lisbon Recognition Convention, responsibility for demonstrating that an application to an institution does not meet the requirements for further higher education study lies with the institution.

In Latvia the survey has demonstrated that in most cases there are no problems in recognising foreign qualifications on the basis of the current legislation. According to the views of higher education institutions, recognition is in line with the Lisbon Recognition Convention and national legislation. At the same time only some of the higher education institutions have adopted internal documents on recognition practices based upon national legislation. Higher education institutions also stressed the problem of a lack of information and skills for credit transfer, i.e. the actual replacement of the courses in their own curricula with the ones studied abroad.

In Denmark the survey demonstrated that higher education institutions follow CIRIUS (the Danish ENIC/NARIC) guidelines, that many institutions have common standards and that they use the CIRIUS hotline. The survey has also yielded a number of suggestions for further improvements.

In Norway all phases of the recognition procedure at higher education institutions are described in detail and are a part of the internal quality assurance system. The Norwegian survey has demonstrated that most of the higher education institutions have written procedures; only a minority have routines to detect possible mistakes or routinely send acknowledgements to confirm receipt of applications; a few routinely inform applicants about the expected time needed to process them and

some are actively working on measures to reduce the time. In the survey, the higher education institutions were also asked to estimate their own degree of implementation of the Lisbon Recognition Convention on a scale from 1 (low) to 5 (high). Half of the higher education institutions which responded gave themselves the score 4, 15% reported full implementation (score 5), six scored 3 and one claimed to score 1. Norway sees as the most effective measure the inclusion of the use of the criteria and procedures in the higher education institutions' system for quality assurance.

Recognition of credits/study periods

Very few countries have mentioned the recognition of credits in their national action plans. In most cases the section on institutional practices just generally describes the implementation of the national and international legislation or organisation of recognition at higher education institutions but the section on ECTS in turn is devoted to implementation of ECTS credits in their own programmes.

The limited number of answers shows that the decision on recognition of credits/ study periods is usually taken by the higher education institutions (e.g. in the Czech Republic, Hungary, Iceland, Latvia, Lithuania, Romania and, since 2002, France) or higher education institutions on the advice of the ENIC/NARIC (e.g. Denmark, Estonia and Sweden). A more peculiar situation arises in Spain where universities are entitled to recognise periods of university study abroad while periods of foreign non-university study are recognised by the Ministry of Education, and in Germany where in cases where a programme concludes with "state examinations", credits are recognised by the examination authorities of the *Land.*

The procedures for recognition of study periods/credits vary. Sweden claims that, in recent years, recognition of study periods is based on the existence or non-existence of substantial differences in learning outcomes rather than on differences in detailed content. Denmark admits that it could not be clarified whether the institutions look for full compliance with their own curricula and Germany reports that laws on higher education stipulate that equivalence must be determined in order to recognise course credits earned abroad and that detailed information on equivalency determination is given in the framework examination regulations. In Latvia, higher education institutions admit that they have too little experience and should have more information in order to provide fair recognition of credits earned abroad. Denmark and Romania report that, in the case of an exchange agreement with a foreign institution, the recognition of study periods can be automatic and with full credit. Denmark underlines the importance of the existence of appeals procedures and states that it has also amended legislation so that Danish students are given the same opportunities of appealing against credit transfer decisions as has been possible for people with foreign degrees or study periods.

Credit recognition and recognition of prior learning

The template for national action plans did not explicitly request a description of practices for recognition of prior learning and for this reason no overall conclusions

can be drawn. Just three countries – Denmark, Italy and Slovenia – have mentioned recognition of prior learning but there are definitely more countries that allocate credits for prior learning. The three above countries have mentioned very interesting and important issues and therefore it is worth mentioning the practices of each of them.

Denmark has a policy on recognition of foreign degrees where, if a part of the credits towards a degree has been allocated in the country of origin on the basis of recognition of prior learning, the Danish ENIC/NARIC does not question the credit transfer decisions of a publicly recognised/accredited foreign institution.

In Italy, recognition of prior learning has been possible since 1999 and it is used to recognise language and computer skills acquired in alternative ways, credits or certificates from postsecondary educational activities and, based on agreements between universities and professional associations, certificates issued by these associations upon the completion of education and training activities. It is not evident, however, that the same is possible with regard to recognition of prior learning acquired outside Italy.

The response from Slovenia addresses a particular case related to transnational education: it mentions that in cases where the institution or programme operating transnationally as a whole is not recognised, credits could be recognised for the purpose of further education at a Slovenian higher education institution through the mechanisms of recognition of prior or informal learning.

Summary on institutional practices

Even from the limited number of responses it can be seen that while some countries tend to compare learning outcomes of the foreign and home study periods, others may apply detailed comparison of content/equivalence procedures to study periods thus reducing the chances of credit transfer. As the automatic recognition of study periods in those cases where there was a mobility agreement with the foreign institution is mentioned by just a couple of countries, there is no evidence that such practice is widespread.

2.4. Transparency tools for recognition

a. Plans and timetable for the implementation of the European Credit Transfer and Accumulation System (ECTS)
b. Plans and timetable for the implementation of the Diploma Supplement
c. Plans and timetable for the implementation of possible other transparency tools.

Implementation of the European Credit Transfer and Accumulation System

More than half of the countries report that they have implemented the European Credit Transfer and Accumulation System (ECTS) for both credit transfer and

accumulation. While quantifying student workload and linking all courses of the programme with a certain number of credits is already an important tool for curriculum development, the full effect of implementing a credit system is yet to be achieved through formulating learning outcomes, both for the programme as a whole and for each course, as well as a consequent linking of credits with learning outcomes. This will facilitate adequate recognition of study periods, credit allocation for lifelong learning, as well as provide a basis for dialogue among higher education institutions, employers and students on curricular matters.

It is quite difficult to spell out what it actually means if a country claims to have "implemented ECTS". The learning outcomes aspect appeared relatively recently and there are only a few countries that have actually reworked their study programmes linking each course with learning outcomes. Also, "implementation of ECTS" does not always mean national implementation of the ECTS grading scale.

Thus, the feeling is that a statement that a country has implemented ECTS currently means limited implementation where:

−   the country has implemented a workload-based credit system used for both transfer and accumulation; and
−   the workload is measured on the basis of assumption that yearly workload of a full-time student is calculated as 60 credits.

Thus, using the above understanding of what "full implementation" of ECTS currently means, countries could be divided into the following groups:

−   countries that have implemented ECTS as a transfer and accumulation system in the whole higher education system;
−   countries that have implemented workload based ECTS-compatible national credit systems across the whole higher education system;
−   countries that are implementing ECTS but so far have done so only in part of higher education system;
−   countries that are preparing for implementation of ECTS;
−   countries that have credit systems not compatible with ECTS.

ECTS as a transfer and accumulation system introduced in the whole higher education system

According to the national action plans, ECTS has been fully or nearly fully implemented in a number of countries. Albania, Austria, Belgium, Croatia, Denmark, Iceland, Hungary, Liechtenstein, Malta, Poland, Romania, Serbia, Slovenia, "the former Yugoslav Republic of Macedonia" and possibly more countries have started implementation. Denmark and Iceland state that they focus on the proper use of ECTS, meaning that credits are linked to learning outcomes, and plan to ensure it through quality assurance procedures, and the same seems to be the case in Finland. Some of these countries, for example Iceland and Malta, have had workload-based credit systems for decades, whereas others started implementation of ECTS as a

transfer system in the 1990s and changed it to an accumulation system recently. Yet others, for example Albania, Croatia, Poland and Serbia, started just a couple of years ago. Several countries of this group indicate that there are some particular types of institution that are not obliged to use ECTS (Denmark) or that there are still implementation difficulties (Albania and "the former Yugoslav Republic of Macedonia"). The French Community of Belgium reports that while a credit system has been fully introduced, the study year still remains the main benchmark.

ECTS-compatible national credit system implemented in the whole higher education system

The countries mentioned below have fully implemented credit systems and some of them did so a decade or even several decades ago. These countries include Estonia, Finland, Italy, Latvia, Lithuania, Norway, Sweden and Slovakia.

Some of the above countries, for example Finland, Italy and Norway, even apply 60 credits as the measure of yearly workload but, because of other differences in their national action plan, still regard their own credit systems as "compatible" and do not claim to be using the ECTS itself.

Others, such as Estonia, Latvia and Lithuania, are planning to switch their national credit systems to the ECTS. Estonia, where an ECTS-compatible credit system has been used for about a decade, states openly that it will have implemented ECTS properly in the academic year 2009/2010 because rearranging of programmes linking them with learning outcomes takes time. Lithuania and Sweden planned to use ECTS as of 2007, whereas in Latvia the draft law stipulates a switch to ECTS but there are delays in adoption of the law.

Ireland and the United Kingdom might also have ECTS-compatible credit systems but the relevant information is missing in the national action plans. The UK also states that it has reservations about ECTS and is negotiating with the EU Commission about amendments to the ECTS itself. It seems that the reasons for using national ECTS-compatible systems are sometimes in the ECTS itself. Some countries wanted a somewhat clearer definition of what one ECTS credit means, considering the 25-30 student workload hours a somewhat blurred definition; others wanted to keep a national grading scale rather than to apply the ECTS scale.

ECTS is implemented but only in part of the higher education system

A number of countries are implementing ECTS but not yet for all higher education. This may have different reasons: in Cyprus, the Czech Republic (where other credit systems may also be applied) and France the use of ECTS is recommended but not required by legislation, so higher education institutions apply it voluntarily and not yet everywhere. Some countries have made implementation of ECTS compulsory only for the Bologna two-cycle programmes but not for the remaining long single-stage study programmes. This is certainly the case in Germany and might also be the reason why the ECTS applies to 48% of the total student population at the

universities and 30% of the student population at the universities of applied sciences in Switzerland.

Just preparing to implement ECTS

Some countries, for example Armenia, Georgia and Spain, note that they are preparing to implement ECTS and list different measures of preparation. Armenia planned to have guidelines for ECTS in 2007, Georgia in 2008 and Spain in the 2008/2009 academic year.

National systems not compatible with ECTS

There are two countries – Spain and Turkey – where the national credit systems are based on contact hours. Spain plans to introduce ECTS in the whole higher education system in the 2008/2009 academic year and both use ECTS credits for international student exchange.

Summary on implementation of ECTS

While the implementation of ECTS as a credit transfer and accumulation system is indeed progressing, there are a number of issues to be noted:

− in quite a number of countries credit systems are used for both transfer and accumulation;
− not all countries, however, use the ECTS itself; there are still a number of cases where an ECTS-compatible national credit system is used;
− ECTS key features should be further discussed and fine-tuned so that all countries can adhere to the definitions therein;
− there are some countries where a credit system is implemented but it does not yet apply to all higher education;
− in most countries implementation of ECTS so far has not concerned linking credits with learning outcomes. There is a growing understanding that linking credits with learning outcomes is an important component of the credit system; however, implementation of this feature of ECTS will still take time;
− a good practice seems to be using quality assurance as a tool for implementation of ECTS, that is, setting implementation of ECTS as a quality requirement.

The joint European Diploma Supplement

The national action plans show that there has been substantial progress in the implementation of the joint European Diploma Supplement: in 2007 in more than half the countries, all graduates received the Diploma Supplement automatically, free of charge and in a widely spoken language. If countries that issue it upon request are also included, in 2007 graduates received diploma supplements in two thirds of the countries. It should nevertheless be recalled that in the Berlin Communiqué (2003), ministers set the objective that every graduating student receive the Diploma

Supplement automatically, free of charge and in a widely spoken language by 2005. The national action plans show that even at the end of 2006, half of the Bologna member states had yet to comply with the ministers' commitment.

One further observation is that while some countries consider it natural to issue diploma supplements to graduates of doctoral programmes, others seem not to consider doctoral students.

A less positive observation is that a couple of countries issue a Diploma Supplement to graduates with a bachelor degree only upon request. This practice seems to reflect the national understanding of a bachelor degree as just an intermediate qualification rather than as a higher education qualification in its own right.

Most countries have made issuing of diploma supplements compulsory, and in many of them this compulsory issuing started between 2002 and 2005. In Spain the legislation on diploma supplements was adopted in 2003 but, as it is very recent, a statistically significant number of them have not yet been issued.

The Flemish Community of Belgium, the Czech Republic, Latvia and others started implementation immediately after the EU/Council of Europe/UNESCO Diploma Supplement format was adopted but issuing of diploma supplements has been officially made compulsory at a later stage (e.g. 2002 in Latvia and 2005 in the Czech Republic).

There are several countries that seem to issue diploma supplements to the graduates of the "new style" bachelor and master degrees but do not issue it to graduates from the "old style" long one-tier study programmes. Thus, in Germany in 2006 the Diploma Supplement was awarded in 63% of bachelor degree courses and in 55% of master degree courses; in Switzerland it was 100% of bachelor and master degree holders but only some Swiss higher education institutions issued diploma supplements to graduates of long programmes. The compulsory issuing of them also only concerns bachelor and master graduates in Hungary.

However, in some other countries, for example Austria, Cyprus and the United Kingdom, higher education institutions do not have an official obligation to issue diploma supplements.

While the guidelines for implementation of diploma supplements strongly recommend not producing customised versions, some countries mention that they have created national versions of the Diploma Supplement. As there is no further information given in the national action plans of those countries, it is not clear if the "national" diploma supplements fully follow the EU/Council of Europe/UNESCO Diploma Supplement format. Is it just that the relevant national information is added in, for example, points 6 and 8 of the Diploma Supplement (i.e. additional information

and description of the national higher education system) or has the "national" Diploma Supplement been further customised?

The languages of the diploma supplements

Most of the countries that have mentioned the language aspect report that the diploma supplements are issued in the national language and in a widely spoken European language. Some issue them in the national language and in one of the official languages of the European Union. In another group of countries the other language of the Diploma Supplement is always English. There are, however, a couple of countries that offer diploma supplements in the native language while in a widely spoken European language they are offered only on request. In Hungary, where appropriate, the Diploma Supplement is also available in minority languages upon request.

Plans to introduce diploma supplements after the time when national action plans were compiled

In Armenia it was planned to introduce the Diploma Supplement in 2007; in Italy it was to become legally binding as of 2007. In "the former Yugoslav Republic of Macedonia" the first students will receive the Diploma Supplement in the academic year 2008/2009. In the United Kingdom, following a recommendation by the Measuring and Recording Student Achievement Steering Group in October 2007 a Higher Education Achievement Report will be developed which will incorporate and build on the Diploma Supplement.

Summary on Diploma Supplement

Many countries have made the issuing of diploma supplements compulsory between 2002 and 2005. In 2007, in more than half the countries, all graduates received the Diploma Supplement automatically, free of charge and in a widely spoken language. If countries that issue diploma supplements upon request are also included, in 2007 graduates received these in two thirds of the countries. There are, however, several countries that seem to issue the Diploma Supplement to the graduates of the "new style" bachelor and master degrees but do not issue them to graduates from the "old style" long one-tier study programmes.

Some countries have created national versions of the Diploma Supplement but it is not clear from the national action plans if the "national" diploma supplements fully follow the EU/Council of Europe/UNESCO Diploma Supplement format and to what extent they are customised.

Most countries issue the Diploma Supplement in both the national language and a widely spoken European language (most often English), but there are also countries where it is available in a widely spoken European language only on request.

2.5. Borderless/transnational education

**National and/or institutional policies concerning the assessment
of borderless/transnational education**

Cross-border and transnational education

The answers regarding cross-border/transnational education demonstrate that the attitude towards cross-border education has changed. While they are aware of the difficulties that borderless education may also bring, countries tend to ensure that the procedures and requirements applied do not exclude borderless education. Thus, the Czech Republic and the Slovak Republic state in their national action plans that the aim should be to avoid discrimination by high-quality institutions and that recognition of transnational education should not be rejected for formal reasons.

A number of countries, for example Croatia, Estonia and Iceland, underline the importance of the UNESCO/Council of Europe Code of Good Practice in the Provision of Transnational Education[29] and the UNESCO/OECD Guidelines for Quality Provision in Cross-border Education.[30] Some respondents, for example Belgium (Flemish Community), Hungary, Italy, Norway, Slovenia and Ukraine, have adopted the principles in their national legislation (or ENIC/NARIC guidelines in the case of the United Kingdom). The code of good practice was consulted when drafting legislation in Serbia. However, some other countries report that their procedures for accreditation and recognition of qualifications are still not geared to addressing cross-border provision. In, for example, Austria, the French Community of Belgium, Georgia and Denmark (where legislation was in the drafting stage at the time of submitting the national action plan), there is no specific legislation concerning transnational/borderless education, while Bosnia and Herzegovina and Iceland state that they do not have a specific policy on transnational/borderless education.

Most countries link recognition of cross-border education to compliance of the provider with the national legislation of both the sending and receiving country, information provision and quality assurance. Several countries, for instance Belgium (French Community), Denmark, Italy, Latvia, Liechtenstein, Lithuania, Malta, the Slovak Republic and Switzerland, link recognition of cross-border qualifications to accreditation or official recognition of the institution/programme in the receiving country. Finland reports that while in the case of academic recognition and de facto professional recognition the decision on the recognition of transnational qualification is for higher education institutions or employers, respectively, to make, in the case of de jure professional recognition in regulated professions the qualification has to be officially recognised in the country of origin.

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29. Adopted by the Lisbon Recognition Convention Committee in Riga 2001, revised version adopted by the Lisbon Recognition Convention Committee at its 4th Session (Bucharest, 2007), www.aic.lv/ace/ace_disk/Recognition/leg_aca/Code_TE_rev2007.pdf.
30. Available at: http://unesdoc.unesco.org/images/0014/001433/143349e.pdf.

The following kinds of requirements for recognition of cross-border qualifications are mentioned in national action plans for recognition of different countries:

− the awarding institution[31] and/or the programme is recognised/accredited in the sending country. In Denmark, for instance, accreditation in the sending country may imply the right to establish Danish-accredited cross-border education.

− the cross-border institution or programme is accredited/recognised in the receiving country, for example Italy, provided that there have been adequate quality assurance arrangements in place in the home country, for example, Ireland.

− some countries apply both of the above requirements; for example Belgium (French Community), Latvia, Liechtenstein, Sweden and some others stress that a condition for recognition of cross-border qualifications is that the programme provided transnationally should be accredited/recognised separately from the ones offered by the awarding institution in the sending country.

− cross-border education should comply with the legislation of the receiving country; for example, in the Czech Republic compliance with the legislation may result in accreditation of the cross-border education in the receiving country.

− the same or essentially similar programme should be provided by the awarding institution in the sending country, for example Sweden.

As regards the international higher education institutions that do not belong to any national education system, some countries report in their national action plans for recognition that degrees awarded by such cross-border providers are considered for recognition if they are recognised in the country where the programme is provided. In Slovenia, in the cases where the transnationally earned qualification as a whole is not recognised, credits could be recognised for the purpose of further education through the mechanisms of recognition of prior or informal learning.

Denmark has indicated an issue that may well be relevant to more countries: in Denmark the borderless education providers are treated like other private higher education institutions that exist outside the public system, which means that they cannot offer Danish national degrees. As regards Danish higher education institutions, they do not have the possibility of delivering nationally recognised degrees outside Denmark.

In Russia, the export of Russian education is considered a very important issue and therefore the Gosudarstvennaya Duma has adopted a plan of measures to stimulate it.

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31. The definitions used here and later are from the Revised Code of Good Practice in the Provision of Transnational Education.

In Turkey, transnational qualifications are not recognised. In Bulgaria, transnational institutions are allowed but not recognised. Since the accession of Bulgaria to the EU, higher education institutions officially recognised by the EU member states, the European Economic Area and Switzerland can open affiliates in Bulgaria on condition that they adhere to the regulations of the Higher Education Act.

While Georgia says there is no transnational education on its territory yet and Slovenia says it has little, Malta has a considerable number of licensed private providers of courses leading to foreign qualifications. Cyprus reports serious difficulties in connection with transnational degrees, because the qualifications earned transnationally often include a high number of credits based on work experience or where large parts, if not all, of the education has taken place through e-learning. According to the Cyprus national action plan, the assessment of transnational qualifications may therefore take more time than recommended in the Lisbon Recognition Convention, especially in the case of transnational distance learning qualifications.

Summary on borderless/transnational education

While some countries express their good will to give the green light to bona fide transnational/borderless education, countries also express concern about possibilities to access information on the quality of transnational education or to check whether the transnational e-learning has been properly assessed and whether allocation of credits for work experience has been properly done. These issues have often been discussed but proper solutions have yet to be found.

3. Information provision

3.1. Provision of information on recognition

a.	Measures taken or envisaged to improve the provision of information on recognition criteria and procedures and on the national education system;
b.	The timetable envisaged for such measures;
c.	The bodies or institutions responsible for the measures;
d.	The state of electronic provision of information on recognition;
e.	Whether the national information centres establish and maintain their own web pages, linked to the ENIC-NARIC website.

3.2. Information package for applicants

a.	The extent to which information packages are provided for applicants by higher education institutions and other competent recognition authorities and,
b.	If needed, how practice could be improved.

It is important to note that most countries have not distinguished between points 3.1 and 3.2 in their national action plans. The answers are often unclear and represent a mix of descriptions as to how countries provide information on their own educational systems and how they provide information to holders of foreign qualifications applying for recognition.

Most countries have mentioned their ENIC/NARICs as the main disseminator of information packages for applicants. Some countries have mentioned the respective Ministry of Education, its division responsible for academic recognition or the higher education institution itself.

The level of support to applicants for recognition differs from country to country. There are countries with a high level of service that, as well as an information package, provide applicants with feedback on the status of their applications. The French Community in Belgium offers the possibility of an online status check on their website.[32] In Denmark the applicants are notified if the processing of their application has been prolonged. Denmark is planning a user survey to gather information on how the existing system can be improved while Sweden has stressed the need for more active information measures at higher education institutions in their

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32. See: www.equivalences.cfwb.be/dossier.asp, site in French only.

follow-up study of 2004. Germany is currently developing standards of assistance in recognition procedures.

The service level in some countries is more passive. Some of the respondents declare that they provide the very basic information needed for starting the application process – just the list of documents necessary for the recognition of qualifications and the special application form. This is less applicant-friendly and efficient if the applicant needs more standardised information. There are cases where information is provided only by putting notices up in the building of the recognition authority, which makes the information rather inaccessible to applicants. The applicants can be better assisted, not only through face-to-face or telephone counselling, but also by being able to carry out research on the Internet (where the information should also be organised in an accessible manner), and to request the necessary documents by email or standard mail. Provision of information in paper form only (Armenia) may mean longer processing times altogether.

Most often the criteria and procedures for the assessment and recognition of foreign qualifications are regulated at national level, prepared in the majority of cases by the ENIC/NARIC or the respective ministry. The recognition authorities have to follow standard criteria and procedures, but usually there is no regulation at national level on standardised information packages.

Denmark, Estonia, Iceland and others state that a standardised information package or a list of documents based on experience has been drawn up and at best contains information on:

− who may apply;
− guidelines on how to fill in the application;
− the purpose(s) of recognition;
− documents required;
− assessment procedure, including the role of the recognition authority, other assessment agencies and higher education institutions (who takes the decision, how binding this decision is);
− object and criteria of the assessment;
− processing fees;
− time normally required for processing;
− outcome of the assessment;
− status of assessment;
− conditions and procedures for appealing against a recognition decision, according to national legislation, rights regarding recognition;
− final clauses;
− contact data;

– additional information (government decrees on recognition – full text, reference to the national laws and international conventions and agreements which may be relevant to the assessment of foreign qualifications).

Such standardised information is available on the website and as printed material (brochure) in the national language.

In some countries not all information on recognition is yet available online. Albania plans to link the recognition authorities responsible for recognising foreign master degrees and foreign doctorates to the ENIC/NARIC website by the end of 2007. While responsibility for the recognition of different levels of diplomas in Albania is dispersed among different recognition authorities, the French Community of Belgium plans to create a one-stop office dealing with all requests for the recognition of qualifications from secondary and higher education, believing that this would allow applicants to be guided more efficiently. Several countries have a single e-mail address to which questions concerning recognition can be sent.

In the good examples, the information is available in both electronic and printed form in a number of locations, for instance on the website and in the programme prospectus of the higher education institution and on the websites of various state bodies and agencies (stakeholders). Higher education institutions are usually the first stop for applicants. Therefore Albania is planning to link the website of the recognition authority to the higher education institution websites.

Even if the information is provided, one has to make it accessible to the audience: both local and foreign. Denmark and Hungary not only provide information to the local audience, but also take a step further by ensuring that the information available is understandable and does not contain terms that are not easily understood by non-specialists.

It can be seen that in several countries the recognition information is provided in the national language only. Without information available in widely spoken European languages the content of the websites is not easily accessible to speakers of other languages.

Some countries report that if the main information on recognition is available and accessible (easy to find, no language barrier) on the website of the ENIC/NARIC, higher education institutions might only need to provide information in their programme prospectus on the entry requirements for each programme alongside information on the ENIC/NARIC. In Poland the higher education institutions provide all information on their own. Each body responsible for publishing the information is usually in charge of updating that information. In Germany the information is provided by many stakeholders and a review could be carried out as to whether the requirements and process of assessment and recognition could be presented more concisely.

In Hungary the recognition application form and relevant information on recognition is available on the ENIC/NARIC website but, due to the great variation in

foreign applicant numbers at the higher education institutions, the level of support varies from standard information already accessible on the website of the higher education institution to answers given by phone upon request. It is recommended that higher education institutions with a significant number of applications also provide essential information on their academic recognition procedure on their websites. Armenia is even planning to introduce the possibility of applying for recognition online.

Several countries, for example Belgium and Sweden, are currently conducting research into how to improve the recognition process in the country. Ireland is reorganising the website in a more user-friendly manner.

In "the former Yugoslav Republic of Macedonia", the ENIC/NARIC is highly involved in creating and improving the legislative framework, while the assessment of foreign qualifications itself is delegated to the higher education institutions, whose recognition decisions are then monitored, examined and approved by the information centre.

An interesting observation is that, as with some other issues, the countries that already provide good information are also the ones planning further improvements.

Just a few countries mention information provision on their education systems at all. This is symptomatic and links to fulfilling the obligations that parties have undertaken when they ratified the Lisbon Recognition Convention. Provision of information regarding one's own educational system is of high importance for credentials evaluators in other countries. It is very helpful on condition that it is specifically targeted at credentials evaluators and contains concentrated information, for instance, on the types of institution, programme and qualification, quality assurance and also recently the qualifications frameworks. Some countries in their national action plans have mentioned that the function of information provision on their education systems abroad is delegated to other bodies. At best, those bodies are specific education information agencies that might also be able to provide recognition-related information, but this arrangement is highly questionable if the information provision is left to the general representations of countries abroad (for example overall national promotion agencies, embassies), as mentioned in several national action plans. The problem here is that the information at the level of those providers is usually too general and too much targeted at the general public or at young people who are considering going to study abroad. Lack of recognition-specific information leads to the need to send large numbers of questions to other countries' ENICs to receive information that could otherwise have been found on the Web.

Summary on information provision

The quality of information provision seems to vary considerably in different countries, and the spectrum is quite broad. It ranges from countries that have excellent information for applicants in their national language and in English (or another

widely spoken European language) available online, in printed and possibly in other forms, to countries where only minimum information is provided in the national language only and this information may be available only at the ENIC/NARIC.

An example of good practice is that provision of recognition information is co-ordinated between the ENIC/NARIC and the higher education institutions so that the specific information from higher education institutions adds to the general information provided by the ENIC/NARIC.

Information on education systems relating specifically to the recognition of quali-fications is well established in some countries but other countries only provide general information on their educational systems that contains too little of the information actually needed for credentials evaluation.

4. Structures

4.1. *National information centre*

Outline the functioning of the national information centre (ENIC/NARIC), e.g. with regard to:

a. The formal status of the centre;

b. Legal competence (e.g. advisory or decision making; academic, de jure professional, de facto professional recognition);

c. Staff and budget;

d. Capacity building in terms of expertise and service to the public;

e. Networking and co-operation at national level and internationally.

The formal status of the national information centre

The different options for the setting up of the national recognition centre (ENIC/NARIC) may vary greatly across the EHEA. The main ways in which the national ENIC/NARIC can be established are:

− as a part of the ministry responsible for higher education:

− as an organisation subordinated to the ministry (e.g. the Flemish Community of Belgium, Denmark, Turkey);

− as an independent agency established either by the government/ministry or ministry together with higher education institutions (e.g. Italy, Norway, Sweden);

− as a part of the national rectors' conference (e.g. Switzerland);

− as a private body operating on a government mandate (e.g. the United Kingdom).

In most countries the national information centre is not formally separated from the ministry responsible for higher education. In such cases the ENIC/NARIC activities are fulfilled by a separate department, for example Albania, Hungary, Romania, Serbia and Slovenia; or a division of the corresponding ministry (Greece). In Ukraine it is a board (Licensing, Accreditation and Nostrification Board) of the Ministry of Education and Science.

In some countries, for instance Greece, it is planned to increase the autonomy of the national information centre by establishing it separately from the ministry as an authority dealing with ENIC/NARIC issues.

There are countries where the national information centre enjoys a formal status of independence. For example, the Danish ENIC/NARIC is part of the national

authority CIRIUS, which in its turn is under the supervision of the Danish Ministry of Education. The Bureau for Academic Recognition and International Exchange in Poland is a state institution informing the minister of higher education about its activities. In Norway the NOKUT[33] is an independent government agency. In Sweden the national information centre is a part of the Swedish National Agency for Higher Education. It is independent, but it gets its mandate and funding from the government. In France the International Centre for Education Studies[34] is a public institution of the Ministry of National Education.

In most cases the national information centre is financially dependent on the respective ministry. In some countries special funding for this function has been allocated, for example in Armenia and Latvia, which makes financial management easier. In a few cases the ENIC/NARIC is a structural unit of a foundation, for example the Estonian ENIC/NARIC is a structural unit of the Archimedes Foundation.

In the Czech Republic, the Centre for Equivalence of Documents about Education is one of the sections of the state-funded Centre for Higher Education Studies. In Italy the role of the national information centre is entrusted to CIMEA, a section of the Fondazione Rui, a private entity legally recognised as a non-profit body.

There are countries where the tasks of the ENIC/NARIC centre are fulfilled by higher education institutions. For example, the Icelandic Ministry of Education, Science and Culture entrusted the University of Iceland with the supervision of Iceland's ENIC/NARIC centre. In Switzerland, in its turn, the ENIC/NARIC centre is a department of the Rectors' Conference of the Swiss Universities (CRUS). In these cases, the bodies designated by the ministry have a national mandate.

There are countries where the national information centre has not been founded by the respective national ministry of education. In Germany the Central Office for Foreign Education (ZAB) is a department of the Secretariat of the Conference of Ministers of Education and Cultural Affairs of the federal states.

The UK ENIC/NARIC is managed by a private company on behalf of the UK Government's Department for Education and Skills. It is thus a private body operating under a public mandate. The National Qualifications Authority of Ireland is an agency of the Department of Education and Science and the Department of Enterprise, Trade and Employment.

The competences of the ENIC/NARICs are usually regulated by national law or secondary legislation. Serbia considers adopting a separate recognition law.

In most cases the ENIC/NARIC's main function is to inform and support the decisions made by the competent authorities for recognition.

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33. Nasjonalt organ for kvalitet i utdanningen – the Norwegian Agency for Quality Assurance in Education.
34. CIEP – Centre international d'études pédagogiques.

Role of national information centre in academic and professional recognition

The area of recognition (professional and academic) and sometimes even the extent of the qualification level affected by the decision vary among the different countries. Thus, for example, Albania states that "there is no actual difference between the academic and the professional recognition". In Denmark, to create a better synergy, one single national entry point (namely CIRIUS) in relation to recognition of all kinds of qualifications, both professional and academic, has been created. The ENIC/NARICs of EU and European Economic Area (EEA) countries are often also the contact points for recognition of professional qualifications covered by EU Directive 2005/36/EC. The ENIC/NARIC in Iceland, however, deals with academic recognition issues only, while professional recognition is handled by the appropriate ministries.

In cases where the ENIC/NARIC is not responsible for professional recognition in the relevant professional area, it refers applicants to the appropriate competent authority, acting as the contact point on professional recognition. Some ENICs give de jure professional recognition of teacher qualifications for the purpose of practising the profession (e.g. Denmark, Hungary). In other cases, at the request of the applicant, the Hungarian ENIC/NARIC assesses the foreign qualification and give de facto recognition.

In Sweden the decisions by the ENIC/NARIC on teaching certificates have formal legal status, whereas other regulated professions in Sweden are evaluated by the competent authority appointed by the government.

In most cases the ENIC/NARIC has an advisory role and the decision on recognition is taken by a different competent authority. The recognition statement delivered by the ENIC/NARIC is essentially a recommendation and thus not legally binding. It usually describes the level and status of the given credential in the country of its origin and often the possible level of recognition in the host country in question. The final decision in countries such as Cyprus, Ireland, Italy, Latvia, the Netherlands, Norway, Poland, Serbia, Spain, Sweden, Turkey and the UK lies with the higher education institution, employer or professional body concerned. However, it is usual that the position taken by the national information centre is trusted and endorsed by the bodies concerned. In order to ensure the quality of decision making on the basis of the recommendations issued, the Swiss ENIC/NARIC participates in the CRUS Commission for Admission and Equivalence, which oversees the recognition practices of the universities.

In some cases it is planned to change the competence of the ENIC/NARIC so that they can make the decisions (e.g. Latvia), but other countries (e.g. Estonia) do not plan to change anything in the status of the national information centre.

The decisions taken by the national information centre in the French Community of Belgium have the form of decrees in the name of the government and therefore have legal status: "a favourable decision on the equivalence of a foreign diploma

… provides the same legal effects as the diploma awarded in the French Community to which it is considered equivalent". France in its turn states that "a legal principle of equivalency between foreign qualifications and French qualifications awarded by the ministry of national education, higher education and research does not exist". Therefore the admission of foreign students to French higher education institutions requires a decision on exemption, issued by the rector (Président de l'Université in the French terminology) or the director of the institution concerned.

There are countries in which the ENIC/NARIC has both advisory and decision-making functions by having an advisory role in academic recognition and a decision-making role in professional recognition. Thus, for example, the Hungarian ENIC/NARIC operates as an advisory body on issues of academic recognition but it makes legally binding decisions in cases concerning recognition for employment purposes. The situation is similar in Armenia. The Slovak Centre for Recognition of Diplomas decides on the recognition of qualifications of citizens of the Slovak Republic and EU member countries wishing to perform regulated professions and issues a certificate for automatic recognition of third cycle higher education qualifications obtained abroad and for educational competence obtained on the territory of the Slovak Republic. In Albania, the Department of Higher Education and Recognition of Diplomas researches the cases and provides a draft decision, which is then signed by the deputy minister and thus becomes valid.

Legal competence

The most typical case is that the national information centre is an advisory body for both academic and professional recognition while the decisions are taken:

− for academic recognition – by higher education institutions;
− for de facto professional recognition in non-regulated professions – by employers; and
− for regulated professions – by the competent authorities of each profession.

There are several other possibilities:

− the ENIC/NARIC is the decision-making body for all cases of recognition;
− the ENIC/NARIC makes the decision in the name of a minister;
− decisions are taken by a minister/deputy minister/ministry upon the advice of:

  - the ENIC/NARIC;
  - higher education institutions; or
  - committees of academics/scientists.

In a number of countries the ENIC/NARIC makes recognition decisions with a view to employment in non-regulated professions, while in most cases the de jure professional recognition for employment in regulated professions is carried out by

the competent authorities (often professional organisations) nominated by the government (in Malta and Iceland the relevant specialised ministries are in charge).

Summary: who actually makes recognition decisions?

In a substantial number of countries, for example the Czech Republic, Estonia, France, Georgia, Germany, Latvia, Liechtenstein, the Netherlands, Poland, Switzerland and the United Kingdom, the national information centre is an advisory body while the decisions are taken: by higher education institutions for academic recognition; by employers for de facto professional recognition in non-regulated professions; and by competent authorities nominated for each profession for de jure professional recognition for access to regulated professions.

However, this is not the only possibility. In some cases, for example Armenia, the French Community of Belgium and Croatia, the ENIC/NARIC is the decision-making body for all cases of recognition.

Recognition decisions can also be taken (at least nominally) by the minister/deputy minister/ministry, as, for example, in Albania, Denmark, Lithuania, Romania and Ukraine (by the nostrification board of the ministry) or Bulgaria (commission for recognition established by the ministers). The case of "the former Yugoslav Republic of Macedonia" is interesting, as recognition seems to be done in a reverse order compared to the "typical" case: the higher education institutions prepare recognition decisions; these decisions are examined by the ENIC/NARIC and then officially signed by the minister. In Turkey the recognition decisions are made by the Council of Higher Education (YÖK, in which the ENIC/NARIC is located) and higher education institutions have no function in recognition at all. In Spain, while higher education institutions can decide on recognition of master and doctoral degrees, for all other degrees the decisions are no longer taken by the ministry. Instead, technical committees created within the University Co-ordination Council will issue statements on recognition of a particular foreign qualification or parts of it.

In a number of countries the ENIC/NARIC makes recognition decisions with a view to employment in non-regulated professions, for example in Greece (here the academic and de facto recognition are considered the same), Hungary, Slovenia and Sweden.

While in most cases de jure professional recognition for employment in regulated professions is carried out by competent authorities (often professional organisations) nominated by government, in Malta and Iceland the specific ministries are in charge.

Staff and budget

The number of people employed by the ENIC/NARIC ranges from 40 (administrative personnel included) in the United Kingdom, closely followed by 36 staff members in Germany down to one person responsible for recognition issues in Albania (though it is planned to increase this to three staff members in 2007). In

some countries, for example Slovakia and Turkey, the employees are civil servants even if the ENIC/NARIC is not part of a ministry.

Staff members are not always employed full time. For example, in Iceland of the five people dealing with recognition, none is employed full time for this task. Staff members are sometimes supported by senior policy experts in the respective organisations who are not dealing with the processing of recognition applications as their primary job (e.g. in Ireland). In France, "*réctorats*" – that is, state administrations depending on the Ministry of Education (MENESR) and set up in each local education area ("*académie*") – are competent to provide recognition attestations indicating the level of studies to holders of foreign credentials living in their region. In Denmark, CIRIUS occasionally buys consultant services. In Ireland, experts and internship students from foreign ENIC/NARICs and higher education institutions in, for example, Germany, Italy and Poland, have worked for short periods with the recognition of qualifications.

In somewhat larger units, alongside the (professional, academic) evaluation experts there may be a head of office, secretary and information officer. The Estonian ENIC/NARIC shares the services of the general secretariat, the accounting department and the IT manager with the other departments and offices of the Archimedes Foundation. Latvia plans to employ a lawyer, Iceland already does. CIRIUS in Denmark considers the inclusion of juridical competences "both necessary and a clear advantage in connection with CIRIUS' efforts to establish itself as an authority making authoritative decisions and standard setting and to proactively influence the legal framework and frame of competence of CIRIUS".

The budget (see Table 2) ranges from €25 000 (Latvia) up to €1 175 000 (Denmark, excluding 25% of indirect costs). In a number of countries, for example Albania, Belgium (French Community), Hungary, Serbia and Spain, where the national information centre is part of a bigger organisation, the budget of the national information centre is not separated from the overall budget.

Table 2. Staff and budget of national ENIC/NARICs

Country	Staff	Comments	Budget
Albania	1		No separate budget
Armenia	6		US$50 000
Belgium (French Community)	5		No separate budget
Czech Republic	3	Full-time	

Country	Staff	Comments	Budget
Denmark	14	Head of office, 7 credential evaluators, 1 information officer, 2 employees dealing with professional de jure recognition, 1 secretary and 2 part-time student employees	€1 175 000 to recognition of foreign qualifications (direct costs) with the addition of approximately 25% of this amount for indirect costs (administration, support, etc.)
Estonia	3.75	Full-time equivalent staff positions	
France	5	Full-time	€150 000, all charges included
Georgia	5	Head of the division, 2 senior specialists and 2 specialists	The budget of the division is part of the budget of the Ministry of Education and Science. The annual salary fund of the division is about 29 400 Gel (€13 320; 1Gel= €0.45)
Germany	36	Full-time equivalent of 28.5 positions	Central Office does not have a separate budget
Greece	21	Permanent staff, there are also academic advisers (temporary staff)	
Hungary	13		No separate budget
Iceland	5	Part-time	The Ministry does not pay for the day-to-day operations of the centre, but has paid for variable costs. Decisions on the payment of these expenses are taken on an ad hoc basis. Apart from this, the unit is financed from the budget of the University of Iceland
Ireland	4	4 full-time, and 3 part-time	
Italy	2	2 full-time and 2 part-time	€230 000
Latvia	2	2 full time and 1 half time	2006: €25 000 per year, 2007: est. €50 000 per year

Country	Staff	Comments	Budget
The Netherlands	25	Not all full-time	
Norway	10.5	Full-time equivalents	ENIC/NARIC function within NOKUT has approx. €606 000
Romania	15		The NCRED is doubly financed, from the state budget and from external sources (its own funds)
Serbia			No separate budget
Slovakia	9	Civil servants	
Slovenia	8		
Spain			No separate budget
Sweden	22	The information centre is part of the Department for Evaluation of Foreign Higher Education, within the National Agency. The Department has a staff of 22 of whom 16 are credential evaluators.	The budget for the Department is about 11.5 million SEK (of which 10.5 are costs for staff), plus overhead costs.
Switzerland	4	2 scientific collaborators and 2 secretaries	CHF 405 000
Turkey	5	Civil servants	
Ukraine	9		
UK	40	There are 15 members of staff employed on activity concerned directly with the recognition and evaluation service. This function operates and is supported by a wider infrastructure with a total of 40 staff.	The UK NARIC service is provided on a self-funding basis.

Capacity building in terms of expertise and service to the public

The United Kingdom operates a structured and continuous staff development policy, including induction training and continuous professional development.

CIRIUS in Denmark:

> employs internal as well as external Quality Assurance mechanisms. An employee manual (*personalehåndbog*) collects the accumulated knowledge and best practice. The manual functions as a starting point for staff training and is a guarantee that cases are handled in a professionally consistent way. The assessment procedures for the various recognition modes are described step by step. Other internal mechanisms are recurring evaluation seminars, checklists supporting the evaluation procedure and double-checking of all statements. The filing of all incoming and outgoing mails is introduced to support the sharing of knowledge and information and consistency in assessments. An annual "contract" between the Director and the Permanent Secretary of the Ministry of Education forms the basis of the external quality assurance mechanisms. CIRIUS is responsible for preparing annual report on the state of recognition work in Denmark. This report is transferred to the Ministry of Education and presented to the Parliament (Folketinget) by the minister.

In Albania no special qualifications are formally stipulated for the ENIC/NARIC staff. In some cases, for instance in Sweden, credentials evaluators should have at least a first (bachelor) degree. Except for the secretary and the student employees all employees hold a second (master) degree in Denmark. All staff members of the Estonian ENIC/NARIC hold at least master-level qualifications and the same is true in the United Kingdom. Many countries emphasise that staff members should have skills in the assessment of foreign qualifications and should be familiar with the international and national legal framework for recognition. This can be acquired either by recruiting the new staff members preferentially from related fields of activities or, ideally, by maintaining staff loyalty and accumulating staff experience. Thus, for example in Iceland, both of the specialists have been involved in academic recognition for more than twenty years. In Sweden half of the staff have been working with credentials evaluations for more than ten years; several others have about five years' experience.

Knowledge of languages is essential. Apart from commonly spoken languages such as English, French and German and the other Nordic languages, including Finnish, the office in Sweden handles documents in Spanish, Russian, Polish, Turkish, Chinese, Japanese and Arabic. In Denmark, apart from Danish, Norwegian, Swedish, English, French and German, CIRIUS is currently able to deal with files in Finnish, Spanish, Greek, Russian, Ukrainian, Turkish and Arabic. Five nationalities are represented in the CIRIUS staff. In addition to language competences, candidates for employment at the Latvian ENIC/NARIC have to be computer literate and have skills in using information and communication technologies.

The expertise of the staff is built up through on-the-job training, and processing of case files is the most common method (Armenia, Latvia). Other forms of training include communication with other members of diverse networks, regular training and participation in international meetings both as speakers, trainers and simple participants, study visits and international projects and co-operation. The Latvian ENIC/NARIC organises internal staff training in order to present and implement the latest developments in the field of recognition.

The ENIC/NARIC often acts as an information resource for the national higher education institutions and other competent recognition authorities. As a result, these external bodies should be able to improve their services to the public. Georgia shows forged documents they have discovered on the website of the ministry. The Estonian ENIC/NARIC in co-operation with partners from other countries or under the auspices of some international organisations, organises at least one international training course per year on recognition issues, the Bologna Process or assessment of foreign qualifications. It is planned to run such training courses at national level regularly one to three times a year. Poland also invites foreign experts to conferences and workshops organised for higher education institutions. It is quite common for staff members to be invited to participate in working groups established by the respective Ministry of Education and other legislative bodies.

An information database is essential for the work on academic recognition. The ENIC/NARIC in the Czech Republic maintains two databases on higher education institutions, their accredited study programmes and fields of study – in Czech and English. Ireland is currently developing an online database which will provide advice regarding the comparability of foreign qualifications in Ireland as well as information regarding education and training systems abroad.

Summary on capacity development

Competence development is underlined as an important aspect by a number of ENIC/NARICs. The main kinds of capacity-building measures inside ENIC/NARICs are staff training and regular updating, participation in the joint ENIC/NARIC network meetings, study visits, organising national or regional training and dissemination events (Nordic, Baltic countries and others), preparing detailed manuals for staff, recruiting staff with specific knowledge of education and/or language skills relevant to different world regions.

Another important part of capacity building is organising different dissemination and training events for the recognition staff of higher education institutions and providing guidance to higher education institutions..

Again, many of these important measures seem to be present in a number of the most well-supported and well-developed national information centres while a number of others mainly mention study visits or have not given any information on capacity-building measures at all.

Networking and co-operation at national and international levels

The range of co-operation partners is directly dependent on the range of activities of the office. Thus, for example, in Germany the Central Office for Foreign Education works very closely with the German Federal Foreign Office, the German University Rectors' Conference and the German Academic Exchange Service (DAAD), as it is "involved in the preparation of government agreements on equivalency in the higher education area as well as in equivalency arrangements of another sort".

CIRIUS' assessments are seen as part of the integration process of foreigners in Denmark. In this respect CIRIUS has close relations with guidance counsellors, job centres, social partners and other parties engaged in integration.

The partners depend on the role the recognition office plays. The Danish Integration Ministry is another important partner of CIRIUS, since its assessments form part of the integration process by clarifying foreigners as to their possibility of seeking employment or further education in Denmark. A collaboration worth mentioning has developed in Italy "with professional councils, and such organisations as chambers of commerce, trade unions, etc., regional authorities competent for education and training, CRUI, higher education institutions, and other public authorities in charge with finalised academic recognition".

Staff members also define the scope of collaboration and networking. Due to the part-time nature of their work, the office employees in Iceland participate in the work of the NUAS Ekvivaleringsgruppen,[35] the NUS (the Association of Nordic Universities) and the EUA (European University Association). The head of staff in Iceland is the Secretary General of the Icelandic rectors' conference. Staff members in the Netherlands are active in various national and international networks, for example KBS, a network of international student counsellors.

At national level the ENIC/NARICs collaborate with different ministries, and national education institutions, student unions, rectors' conferences, national accreditation services, quality assurance agencies and similar bodies.

Other co-operation partners are mentioned including transparency and information centres (e.g. Europass, Euroguidance, Eurydice and Eures) and mobility agencies (e.g. Socrates). Ireland, for co-operation at national level, has even established a consultative group "to advise it on its approach to performing its recognition co-ordination function and to working with stakeholders, in general, and awarding bodies, in particular, in this regard".

The Nordic ENIC/NARICs have formed an umbrella organisation called NORRIC. There is also strong co-operation between the Baltic ENIC/NARICs. The Austrian ENIC/NARIC has organised a close co-operation with the ENICs of the neighbouring countries and beyond.

At international level ENIC/NARICs, first of all, are members of the ENIC and, within the EU/EEA, also of the NARIC networks. Apart from that, they most often mention collaboration with foreign higher education institutions. There are evidently centres that are very internationally active; for example CIMEA (the Italian ENIC/ NARIC) is a member of the ENIC, NARIC and MERIC[36] networks, but it also co-operates with the AEC (European Association of Conservatoires), the EAIE (European Association for International Education), EURES (the European Job

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35. Recognition group of the Nordic co-operation association for university administrators.
36. Mediterranean recognition information centres, a UNESCO network established in 2006 and made up of national centres from the southern as well as the northern shores of the Mediterranean.

Mobility Portal), FEDORA (European Forum for Student Guidance), ECSTA (European Council for Student Affairs) and FEANI (the European Federation of National Engineering Associations), as well as with foreign organisations, such as Education International, NAFSA (the Association of International Educators), NIAF (the National Italian American Foundation) and WES (the World Educational Services Foundation) in the USA, BBT (the Federal Office for Professional Education and Technology) in Switzerland, DAAD in Germany, the British Council as well as foreign embassies and consulates.

4.2. Co-operation recognition/quality assurance bodies

a. Information exchange between the bodies responsible for recognition and quality assurance;

b. Discussion of an agreement on working methods between these bodies;

c. Use of information on the outcomes of quality assessments in the recognition of qualifications;

d. Use of membership of international networks and associations in recognition (e.g. ENIC and NARIC Networks) and quality assurance (e.g. ENQA) for the mutual benefits of both bodies.

The section on co-operation between recognition and quality assurance bodies seems to be one of the least developed in many national action plans. The answers to the questions in this section, if provided at all, are inconsistent and do not allow us to draw many conclusions. One reason for this might be that the information on quality assurance that the ENIC/NARICs need in their everyday work is nowadays available on the websites of the quality assurance bodies and so the ENIC/NARICs can use them without direct contact with the staff of national quality assurance agencies. With regard to information on the quality assurance status of programmes or institutions in other countries, ENIC/NARICs can easily get information through the close and well-established co-operation within the ENIC and NARIC networks.

Information exchange between the bodies responsible for recognition and quality assurance

In a number of countries, for example Armenia, France, Ireland and the United Kingdom, there is close co-operation between the bodies responsible for recognition and quality assurance, and others, for example Serbia, plan to establish such co-operation. There are countries, such as Belgium (French Community) Estonia, Denmark, Ireland and Norway, where the quality assurance body is a part of the body responsible for recognition or vice versa, or where both bodies are part of some umbrella organisation.

Others, such as the Czech Republic, Germany, Latvia and the Slovak Republic, do not have institutionalised co-operation between recognition and quality assurance bodies, but these bodies have frequent contact in everyday work and use each

other's information base. Some of these countries admit that informal information exchange also takes place when representatives of both bodies participate in seminars on quality evaluation and recognition or when both bodies are represented in working groups concerning development of higher education, including in creating a national qualifications framework. This might also be the case in other countries.

Finally, some of the countries, for example Georgia, did not yet have a quality assurance agency.

Discussion of and agreement on working methods between these bodies

The most far-reaching agreement on working methods between ENIC/NARICs and quality assurance bodies is the joint declaration made by some of the countries participating in the European Consortium for Accreditation in Higher Education (ECA). This declaration aims at establishing mutual recognition of accreditation decisions that might in the future also lead to automatic recognition of qualifications. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (see Appendix V) are also important in this respect.

Other countries state that they have a clear structure of competences in both bodies and therefore believe that there is no need to have a specific agreement on working methods between these bodies. France is currently studying the activities of the two institutions, while Germany plans to do so. In Denmark both organisations already have descriptions of their working methods in the fields of recognition and quality assurance. These have been published on their respective websites. A proposal for setting up new structures for accreditation and quality assurance in Denmark is being discussed.

Norway has put forward an important point concerning co-operation between quality assurance and recognition bodies: quality assurance is a powerful implementation tool in the framework of the Lisbon Recognition Convention in higher education institutions if the assessment of recognition practices becomes part of the quality assurance of institutions and programmes.

Use of information on the outcomes of quality assessment in the recognition of qualifications

In most countries the ENIC/NARIC disseminates information on the outcomes of quality assurance to other ENIC/NARICs so that the latter can use this information when assessing qualifications. They seek similar information from sister ENIC/NARICs but also consult national and international quality assurance bodies regarding quality assessments which have been undertaken abroad.

The United Kingdom takes into account a range of factors, including any available information on the outcomes of quality assessments. France seeks to improve its current procedures, which could evolve towards the inclusion of competences in the recognition process. The French Community of Belgium states that "information about the quality of foreign institutes that award diplomas for which recognition is

requested is not taken into account in the criteria for awarding equivalence". Estonia states that "all outcomes of quality assessment are available to the Estonian ENIC/NARIC". Germany reports that German legislation does not allow accreditation of degree courses in which a degree is awarded exclusively according to foreign law. The Swiss ENIC/NARIC recognises accreditation decisions taken by the respective quality assurance body.

Use of membership of international networks

Most of the countries simply state that the respective bodies are active members of the ENIC and NARIC networks and of ENQA (Norway, United Kingdom). The participation of different countries in current international debates on quality assurance varies in its involvement and strength, if applicable. France and Poland are "observers" in ENQA. Both Ireland and the United Kingdom report very close co-operation with ENQA based on the close involvement of the representatives of their relevant bodies in the board of the association. Estonia reports that "there are no direct contacts between the Estonian ENIC/NARIC and ENQA." In Iceland the recognising bodies are the universities, which makes it difficult and costly for them to be members of international networks and associations. The French Community of Belgium plans, in the future, to be more "active in events related to mobility and the recognition of diplomas and qualifications (NAFSA, EAIE, student exhibitions…)". Thus for example AEQES (Agency for the Evaluation of the Quality of Higher Education) is a candidate member of the ENQA network, and so is the respective institution in Serbia.

Summary on co-operation with quality assurance

Information on quality assurance is used in the daily work of credentials evaluation. In a number of countries the ENIC/NARICs widely use the information on quality assurance when assessing foreign qualifications. They also provide the sister ENIC/NARICs with information on the quality assurance status of programmes and institutions in their countries. As the information on quality assurance is often accessible online, the above does not necessarily mean that ENIC/NARICs have intensive daily contact with their own country's quality assurance body.

The most far-reaching agreement between ENIC/NARICs and quality assurance bodies is the joint declaration made by some of the countries participating in the European Consortium for Accreditation in Higher Education. Its final goal – eventual automatic recognition of qualifications – can, however, only be reached through long-term bilateral work.

It has been noted that recognition and quality assurance bodies often discuss the relevant issues and work together in various national working groups or during workshops, especially in those devoted to the establishment of national qualifications frameworks.

Quality assurance is a powerful implementation tool in the framework of the Lisbon Recognition Convention in higher education institutions if the assessment of recognition practices becomes part of the quality assurance of institutions and programmes.

National action plans as a collection of best practices

The National Action Plans for recognition can also serve as collection of best practice within the European Higher Education Area. The section below shows examples of best practices in various aspects related to recognition.

A number of countries have found suitable solutions in the "triangle" of Lisbon Recognition Convention legal framework as international legislation, national laws and regulations concerning recognition and the issue of institutional autonomy. The solution usually has been found either through transposing the principles of the Lisbon Recognition Convention into national legislation or through making fair recognition of foreign qualifications a criterion for quality assurance of higher education institutions. Some countries have clearly demonstrated in their National Action Plans for Recognition that they apply the legal framework of the Lisbon Recognition Convention according to the spirit of the documents and do not just seek formal compliance with the letter of these documents.

In some countries the principles of the Lisbon Recognition Convention legal framework are also applied to the recognition of qualifications from countries that are not parties to the Convention. At least in some countries there is a clear emphasis on identifying and comparing learning outcomes and not programme details – and the learning outcomes approach is also applied to the recognition of study periods.

A number of ENIC/NARIC centres supply higher education institutions and employers with information on foreign education systems and recommendations for recognition of the qualifications appearing most frequently, make recommendations on recognition of qualifications from particular countries or create collections/databases of previous experiences.

The Flemish Community of Belgium and France are already advanced in RPL (recognition of prior learning). In Finland, a working group has made recommendations for common national principles for the recognition of prior learning to be applied in all higher education institutions. In Denmark, the ENIC/NARIC centre will assess applications from persons lacking or partly lacking documentation of their qualification.

A number of countries can firmly state that their higher education institutions trust and rely on and intensively co-operate with their national ENIC/NARIC centre. In several cases the co-operation includes providing feedback on the recognition decisions the higher education institutions make. Several countries have established mechanisms to identify mistakes in the recognition practices.

There are examples where clear procedures for appeal against a recognition decision have been established.

Quite many ENIC/NARIC centres provide information on the home country's qualifications framework/system for use by credential evaluators abroad and on the quality assurance status of the institutions/programmes in the home country. There is also an information package for the applicants, including application forms, information on criteria and procedures applied, information on possibilities for appeal. The information is available either on the website or upon request or in printed versions

Joint applications. Finland has created joint application system for bachelor degree programmes conducted in English in the Finnish polytechnics, applying the same admission criteria.

Dissemination of good practice is another task to be taken up in the next Bologna period – as fulfilling the tasks for recognition actually means that all of the above should become a reality throughout the whole EHEA.

5. Final remarks

The national action plans show that countries are striving to implement the principles of the Lisbon Recognition Convention. At the same time the national action plans also demonstrate that the real practices of assessment of foreign qualifications are very different in different countries – and that means that the outcome of the assessment of the same qualification could also differ in different countries.

The Lisbon Recognition Convention and its subsidiary texts are indeed setting standards for recognition. These standards are and should be flexible to accommodate the whole variety of different qualifications in the European region and of the national settings. But, as a side-effect, this flexibility unfortunately also opens doors to different understanding of the most important principles of the convention in different countries:

− applicants should have the right to a fair assessment of their previous qualifications or study periods, but how is "fair assessment" understood and how far does the "right" go in the eyes of different countries?

− a qualification should be recognised if there are no substantial differences with the relevant host country qualification, but how does each country interpret the "substantial differences"?

To reach the final goal – to ensure more coherent recognition across the EHEA – we need to:

− find an appropriate solution to the "triangle" of the Lisbon Recognition Convention legal framework as international legislation, national laws and regulations concerning recognition, and the issue of institutional autonomy in all countries;

− conduct an international discussion of the variety of national recognition practices (including stages therein) and terminology;

− continue the discussion and reach consensus on the understanding of "substantial differences"; and

− follow up by fine-tuning national approaches to recognition, recognition practices and terminology.

The final measure of our success will be greater coherence in the outcome of the assessment, namely that assessment of one given qualification in different countries leads to a relatively similar result.

Appendix I – Collection of good and not so good practices

Good practice	Not so good practice or unacceptable practice
Legislation	
National legislation has been adopted or amended on the basis of the principles laid down in the Lisbon Recognition Convention and its supplementary legal texts.	National legislation is not amended after ratification of the Lisbon Recognition Convention. National legislation uses outdated terminology linked to such concepts and approaches in recognition which the Lisbon Recognition Convention aims to abolish ("nostrification", "equivalence")
The principles of the Lisbon Recognition Convention are transposed into national legislation. Higher education institutions observe the national law and hence follow the convention principles.	National legislation contradicts the legal framework of the Lisbon Recognition Convention. Observing national law, the institutions actually ignore the convention principles.
Institutional recognition procedures are related to quality assurance: since fair recognition of qualifications is a part of quality, the institutional recognition procedures and implementation of the Lisbon Recognition Convention are included in the institutional internal quality assurance and assessed at the periodic quality reviews, audits or accreditation.	It is considered impossible to implement the principles of the Lisbon Recognition Convention at institutional level: it is considered as a breach of institutional autonomy.
Databases of recognition cases exist which can be used to make recognition procedures simpler in similar cases.	For autonomy reasons it is considered that state authorities cannot request information from higher education institutions regarding recognition cases.

Good practice	Not so good practice or unacceptable practice
Authenticity and translations of documents	
If necessary, the authenticity of documents is verified through correspondence with the country of origin.	It is requested that all documents have an "apostille".
Translations are not required if the documents are in widely spoken languages.	All documents to be presented must be officially translated.
Lisbon Recognition Convention principles are applied to all applicants including those whose qualifications originate from countries that have not ratified the convention.	
Bilateral agreements	
Further conclusion of bilateral agreements with states parties to the Lisbon Recognition Convention is discontinued but bilateral recommendations are developed with these countries or regionally, using the convention as the only legal basis instead.	
Recognition criteria and procedures	
Differences between education systems are acknowledged and taken into account in the assessment of foreign qualifications.	
There is a move away from seeking full comparability of the foreign qualification to the relevant home qualification towards comparing only those aspects relevant to the rights and functions which the holder seeks to exercise in the host country.	Full comparability of programme contents is sought.
Quality is used as a criterion and the quality assurance in the country of origin is accepted.	Attempts are made to review the foreign higher education institution, department and the programme instead of checking the quality assurance status with the issuing country's quality assurance body.

Good practice	Not so good practice or unacceptable practice
Whenever possible, recognition is based on comparison of learning outcomes and competences.	Programme duration and content details are used as the main criteria for recognition.
An attempt is made to assess qualifications even in those cases where evidence is incomplete or lacking.	Recognition is refused when a relevant qualification to compare the foreign qualification to cannot be found in the higher education system of the host country.
Partial recognition is granted or compensatory measures are set when differences of the foreign qualification compared to the relevant home qualification are substantial in the light of the purpose for which recognition is sought.	Partial recognition is allowed or compensatory measures set when the differences of the foreign qualification are solely in the course content and are not important for the purpose for which recognition is sought.
	A two-stage recognition procedure is applied in which the second stage involves detailed comparison of curricula and the material studied, and is at the same time necessary to gain full rights in the host country.
	Different recognition procedures are applied to different kinds of degree.
	Higher education institutions are excluded from the recognition procedure.
Academic recognition has consequences in de facto professional recognition, i.e. the recognition for the non-regulated part of the labour market.	Full academic recognition is required (including comparison of programmes carried out by higher education institutions) if the applicant intends to enter a regulated profession.
Measures to improve practices	
Information on recognition criteria and procedures should be disseminated among all stakeholders and advice and training provided to the relevant staff of the higher education institutions and to employers.	

Good practice	Not so good practice or unacceptable practice
Institutional practices	
Institutions apply common procedures/ follow common guidelines/use common standards in recognition of qualifications. Recognition procedures are part of the internal quality assurance of the higher education institution.	Institutions have not developed guidelines for recognition and the practice is case-by-case and may differ within the same institution.
Countries monitor how the principles of the Lisbon Recognition Convention and its subsidiary texts are followed by higher education institutions (through observing legislation, monitoring preparation of institutional guidelines, encouraging institutions to prepare common procedures for recognition or by including recognition procedures in internal quality assurance of higher education institutions).	Countries consider that the state cannot influence or monitor recognition procedures at higher education institutions due to institutional autonomy.
Prior learning	
In cases where a foreign qualification contains credits allocated through recognition of prior learning, the decision of the awarding institution is accepted provided that the institution is recognised in the country of origin.	
Transparency tools – Diploma Supplement	
The Diploma Supplement is issued to all graduates of all programmes, free of charge and in a widely used European language.	The Diploma Supplement is issued to graduates of the (new) bachelor/master programmes only and thus leaves many graduates without diploma supplements.
The Diploma Supplement is also issued in the languages of national minorities where appropriate.	The Diploma Supplement is issued in the national language only.
The official format of the Diploma Supplement and the revised explanatory notes are used.	The Diploma Supplement is customised in local versions.

Good practice	Not so good practice or unacceptable practice
Transparency tools – ECTS	
Quality assurance is used as a tool for the implementation of ECTS, i.e. setting the implementation of ECTS as a quality requirement.	ECTS implementation is completely voluntary, including the choice of the credit system to be applied by each higher education institution.
Credits are linked with learning outcomes, including learning outcomes of informal and non-formal education and work experience.	Credit systems based on contact-hours are maintained.
Borderless/transnational education	
Regulations are set in such a way that bona fide transnational education can be legally established and recognised.	Transnational providers in the home country are completely ignored (and refused recognition) without giving them a chance to demonstrate the quality of the education provided.
In cases where the transnationally provided education qualification is not recognised, the methodology for recognition of prior learning is used to check whether some parts of the education in question could be recognised and some credits allocated to the qualification holder.	
Information provision	
Applicants are provided with a full set of the necessary information on recognition: criteria and procedures, how to apply, what documents should be provided. This is done using different means of provision: printed, electronic and by telephone.	Fragmented information on recognition is provided. Information is provided only by putting notices on the wall at the ENIC/NARIC or only in paper format.
Applicants are given opportunities to monitor the progress of the application online or given feedback.	Recognition information in given in the national language only.
There is a hotline for higher education institutions to quickly consult on recognition issues.	

Good practice	Not so good practice or unacceptable practice
Information provision between the ENIC/NARIC and higher education institutions is co-ordinated, covering both the general and institution-specific information.	
Information on the higher education system is available electronically in widely spoken European languages and the content is specifically prepared to be useful in assessment of a country's qualifications in other countries.	Information on a country's education system is: – only available in the national language; – is not focused on issues important in the recognition of qualifications; – is being disseminated through non-specialist channels with no experience in education (e.g. embassies, representations, etc.).
National information centre	
The ENIC/NARIC acts as one single entrance point for both academic and professional qualifications.	Decisions upon recognition are made by bodies outside the ENIC/NARIC and outside higher education institutions such as "nostrification boards" or "equivalence boards".
The ENIC/NARIC co-operates with higher education institutions or other organisations with a view to ensuring the quality of decision making on the basis of ENIC/NARIC recommendations.	Higher education institutions do not participate in decision making on recognition at all.
The ENIC/NARIC has established an internal quality assurance system and is also being assessed externally.	
The ENIC/NARIC has prepared internal manuals for staff containing step-by-step description of recognition procedures.	
The ENIC/NARIC organises regular study visits and training of its own staff and training events for credentials evaluation staff of higher education institutions and competent authorities.	

Appendix II – Guidelines for National Action Plans for Recognition

Elaborated by the ENIC Bureau, the NARIC Advisory Board and the Bureau of the Lisbon Recognition Convention Committee

Approved by the Bologna Follow Up Group, Vienna 7 April 2006

Introduction

In the Bergen Communiqué, Ministers committed themselves to

> draw up national action plans to improve the quality of the process associated with the recognition of foreign qualifications. These plans will form part of each country's national report for the next Ministerial Conference.

On this background, the ENIC Bureau, the NARIC Advisory Board and the Bureau of the Lisbon Recognition Convention Committee have drawn up draft guidelines for the national reports and hereby submit the draft to the Bologna Follow Up Group.

The Guidelines were approved by the Bologna Follow Up Group (BFUG) at its meeting in Vienna on 7 April 2006. The present version reproduces the Guidelines as adopted by the BFUG.

The Guidelines will be found in Appendix 1.

An explanatory note will be found in Appendix 2. This note also provides a number of useful references.

Appendix 1 – National Action Plans for Recognition

Guidelines for national action plans to be elaborated under the Bologna Process, proposed by the ENIC Bureau, the NARIC Advisory Board and the Bureau of the Lisbon Recognition Convention Committee.

1. Legislation

1.1. Lisbon Recognition Convention

Plan and timetable for ratification if not yet accomplished.

1.2. Review of national legislation relevant to recognition

Should include:

a.   The timetable and organisation of the review of national legislation (including secondary legislation);

b.   Steps envisaged as a result of the review, e.g. as regards amending national legislation where needed and an indicative timetable for such amendments.

Could also include:

c.   When and how the outcomes of this review will be published;

d.   How partners in the European Higher Education Area will be informed of the outcomes.

1.3. Bilateral or regional recognition agreements

a.   Conformity with the principles of the Lisbon Recognition Convention.

2. Recognition practice

2.1. Criteria and procedures

a.   Overview of the practice of competent recognition authorities in applying the Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study.

b.   Measures to improve implementation.

c.   Overview of the time required to process applications for recognition and measures to improve this time.

2.2. Joint degrees

a.   Overview of the legal provisions concerning the recognition of joint degrees.

b.   Amendments to remove legal obstacles or to establish legal provision favouring the recognition of joint degrees.

c.   Beyond legal provision, suggestion of policy measures to ensure the recognition of joint degrees.

d.   Overview of double and multiple degrees and policy measures to encourage the recognition of such degrees.

2.3. Overview of institutional practice

Consider what measures have been or should be taken to allow national authorities to know:

a.   whether higher education institutions and other competent recognition authorities comply with the Lisbon Recognition Convention and with national laws;

b.   what measures could be taken if given institutions or authorities were shown consistently not to apply the Convention and/or relevant national laws.

2.4. Transparency tools for recognition

a.   Plans and timetable for the implementation of the European Credit Transfer and Accumulation System (ECTS).

b.   Plans and timetable for the implementation of the Diploma Supplement.

c.   Plans and timetable for the implementation of possible other transparency tools.

2.5. Borderless/transnational education

a.   National and/or institutional policies concerning the assessment of borderless/transnational education.

3. Information provision

3.1. Provision of information on recognition

a.   Measures taken or envisaged to improve the provision of information on recognition criteria and procedures and on the national education system.

b.   The timetable envisaged for such measures.

c.   The bodies or institutions responsible for the measures.

d.   The state of electronic provision of information on recognition.

e.   Whether the national information centres establish and maintain their own web pages, linked to the ENIC-NARIC website.

3.2. Information package for applicants

a.   The extent to which information packages are provided for applicants by higher education institutions and other competent recognition authorities and,

b.   If needed, how practice could be improved.

4. Structures

4.1. National information centre

a.   Outline the functioning of the national information centre (ENIC/NARIC), e.g. with regard to:

b.   The formal status of the centre;

c.   Legal competence (e.g. advisory or decision making; academic, de jure professional, de facto professional recognition);

d.   Staff and budget;

e.   Capacity building in terms of expertise and service to the public;

f.   Networking and co-operation at national level and internationally.

4.2. Co-operation recognition/quality assurance bodies

a.   Information exchange between the bodies responsible for recognition and quality assurance.

b.   Discussion of and agreement on working methods between these bodies.

c.   Use of information on the outcomes of quality assessments in the recognition of qualifications.

d.   Use of membership of international networks and associations in recognition (e.g. ENIC and NARIC Networks) and quality assurance (e.g. ENQA) for the mutual benefits of both bodies.

Appendix 2 – Explanatory note to the guidelines

Introduction

In their Bergen Communiqué, adopted on 20 May 2005, the ministers responsible for higher education of the Bologna Process reviewed progress and objectives with regard to the recognition of qualifications and committed to elaborating national action plans for recognition to improve the recognition of qualifications.

The part of the Bergen Communiqué related to recognition reads:

> We note that 36 of the 45 participating countries have now ratified the Lisbon Recognition Convention. We urge those that have not already done so to ratify the Convention without delay. We commit ourselves to ensuring the full implementation of its principles, and to incorporating them in national legislation as appropriate. We call on all participating countries to address recognition problems identified by the ENIC/NARIC networks. We will draw up national action plans to improve the quality of the process associated with the recognition of foreign qualifications. These plans will form part of each country's national report for the next Ministerial Conference. We express support for the subsidiary texts to the Lisbon Recognition Convention and call upon all national authorities and other stakeholders to recognise joint degrees awarded in two or more countries in the EHEA.

> We see the development of national and European frameworks for qualifications as an opportunity to further embed lifelong learning in higher education. We will work with higher education institutions and others to improve recognition of prior learning including, where possible, non-formal and informal learning for access to, and as elements in, higher education programmes.

The Bergen Communiqué further underlines the importance of recognition policy in establishing the European Higher Education Area, and Ministers have undertaken further commitments in this area. Due reference is also made to the Council of Europe/UNESCO Convention and to the role of the ENIC and NARIC Networks.

In this context, the Bologna Follow Up Group has expressed the desire – and indeed the expectations – that the ENIC and NARIC Networks put forward a proposal for guidelines for the national action plans for recognition that should be elaborated in time for the London Conference of "Bologna Ministers" in May 2007. With the present proposal, the ENIC Bureau and the NARIC Advisory Board, acting on behalf of both Networks, as well as the Bureau of the Lisbon Recognition Convention Committee, put forward suggested guidelines for the National Plans.

Purpose and scope

As stated in the Bergen Communiqué, the national action plans should improve the quality of the recognition process. This should be interpreted to mean that recognition practice should facilitate the fair recognition of learners' qualifications, so that learners can move between higher education systems as easily and flexibly as possible without losing the real value of their qualifications through unreasonable procedures and practice. This again relates to recognition practice, which in the

worst case may discourage learners from applying for recognition or from completing their application procedure, and to content, where unreasonable assessments could grant learners with foreign qualifications less than the real value of their foreign qualifications as expressed in terms of the education system of their host country.[37]

The Bologna Process acknowledges a number of texts that provide guidance with respect to recognition practice, and that also entail obligations for parties. Thus is above all true with regard to the Council of Europe/UNESCO Recognition Convention, which was adopted in 1997 and which entered into force in 1999. As of 24 February 2006, 37 of the 45 members of the Bologna Process had ratified this Convention, while a further 5 members of the Bologna Process[38] had signed but not ratified the Convention and 3[39] had neither signed nor ratified.

In addition, the four subsidiary texts to the Convention, adopted by the Convention Committee, offer guidance. These are:

− Recommendation on International Access Qualifications (1999);
− Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study (2001);
− Code of Good Practice in the provision of Transnational Education (2001);
− Recommendation on the Recognition of Joint Degrees (2004).

All the above texts, as well as the Joint ENIC/NARIC Charter of Activities and Services, are available in a joint publication[40] and on the web. Web references will be given in the relevant parts of this explanatory note.

The National Action Plans should identify what, in the view of the minister responsible for higher education, needs to be done in each country in order to ensure fair recognition. The precise actions and measures will of course depend on the situation of each country, but it is entirely possible to offer guidelines as to what major areas of policy and practice might be considered in elaborating the national action plans and what kind of measures might be envisaged.

It should be noted that since ministers committed to issuing the Diploma Supplement automatically, free of charge and in a widely spoken European language by the end of 2005, and since the implementation of this commitment will be a part of the stocktaking report for 2007, the Diploma Supplement is not included in the outline for the National Action Plans.

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37. Which can be the learners' home country if they have obtained their qualifications abroad and then return to their country of origin.
38. Belgium, Germany, Italy, Netherlands and Turkey.
39. Andorra, Greece and Spain.
40. *Standards for Recognition: the Lisbon Recognition Convention and its Subsidiary Texts* (Strasbourg 2005: Council of Europe Publishing – Council of Europe Higher Education Series No. 3).

Outline of an action plan

The components of an action plan are outlined below, organised around four major categories:

1. Legislation,

2. Recognition practice,

3. Information provision,

4. Structures.

1. Legislation

1.1. Council of Europe/UNESCO Convention

The action plan should

−   Specify whether the Convention has been ratified and,

−   If it has not, what the plans for ratification are.

It should be borne in mind that for the purposes of the Convention, "ratification" means that the instrument of ratification has been deposited with one of the depositories of the Convention, i.e. the Secretary General of the Council of Europe or the Director-General of UNESCO. This follows after completion of the ratification procedures at national level.[41]

1.2. Review of national legislation relevant to recognition

In the Bergen Communiqué, Ministers committed themselves to "ensuring the full implementation of its principles [i.e. the principles of the Lisbon Recognition Convention], and to incorporating them in national legislation as appropriate". This cannot be ensured without a review of national legislation to verify that it is fully compatible with and promotes the implementation of the Convention and its subsidiary texts.

The action plan *should* outline

−   The timetable and organisation of the review of national legislation (including secondary legislation);

−   What steps are envisaged as a result of the review, e.g. as regards amending national legislation where needed and an indicative timetable for such amendments.

In addition, the action plan *could* outline

−   When and how the outcomes of this review will be published;

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41. An updated overview of ratifications and signatures may be found at http://conventions.coe.int; search for ETS No. 165.

−   How partners in the European Higher Education Area will be informed of the outcomes.

It should be underlined that even countries that consider that their legislation in general complies with the Lisbon Recognition Convention and takes on board the subsidiary texts may wish to review its legislation since legislation may still contain clauses that – perhaps unexpectedly – hinder recognition.

Reference documents:
The Lisbon Recognition Convention,
Subsidiary texts, cf. above.

1.3. Bilateral or regional recognition agreements

Many countries are party to bilateral and/or regional recognition agreements. The national action plan could assess whether these are in conformity with the principles of the Lisbon Recognition Convention and, to the extent they are not, consider what measures could be taken to bring them to conformity.

2. Recognition practice

2.1. Criteria and procedures

The Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study, adopted in 2001, outlines the main steps involved in processing an application for recognition as well as the main considerations of substance and form.

The Action Plans should consider

−   To what extent the practice of competent recognition authorities in the country implements the Recommendation;
−   What measures could be taken to improve implementation;
−   The time required to process applications for recognition and measures to improve this time.

It is recalled that the time a competent recognition authority requires to process an application is of key importance to the applicant. Parties to the Lisbon Recognition Convention undertake to make decisions on recognition within a reasonable time limit specified beforehand by the competent recognition authority.

Reference document:
Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study.[42]

For the obligation to make decisions within a reasonable time limit, see also Article III.5 of the Convention and the Explanatory Report to this Article.

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42. Available in the publication referred to and at: www.coe.int/T/DG4/HigherEducation/Recognition/Criteria%20and%20procedures_EN.asp#TopOfPage.

2.2. Joint degrees

Joint degrees are an important instrument for developing student mobility as well as the Europe dimension of higher education. In some contexts, they are still referred to as "double degrees", even if there is a clear difference between joint and double degrees.[43] A part of the discussions within the Bologna Process have focused on how to develop further joint degree programmes, but the recognition of qualifications granted within such arrangements is also a key policy measure.

The National Action Plans should

− Provide an overview of the legal provisions concerning the recognition of joint degrees;

− Suggest amendments to remove legal obstacles or to establish legal provision favouring the recognition of joint degrees;

− Beyond legal provision, suggest policy measures to ensure the recognition of joint degrees;

− Provide an overview of double and multiple degrees and suggest policy; measures to ensure the recognition of such double and multiple degrees.

Reference document:
Recommendation on the Recognition of Joint Degrees.[44]

2.3 Overview of institutional practice

In most countries, many recognition decisions are made by higher education institutions or other competent authorities that are not part of ministries or agencies of the government. The principle of institutional autonomy is also one of the basic principles of the European Higher Education Area. The Convention, in Section II, recognises that the legal framework of parties varies in this regard. Nevertheless, even if national authorities may have limited legal competence in recognition cases, they would have an interest in obtaining and providing information on the practice of competent recognition authorities and to encourage these to follow international best practice. They will of course also need to follow national laws, where applicable. Possibly, national Bologna groups made up of both ministry and academic representatives may play a role in this regard.

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43. A joint degree is a higher education qualification issued jointly by at least two or more higher education institutions or jointly by one or more higher education institutions and other awarding bodies, on the basis of a study programme developed and/or provided jointly by the higher education institutions, possibly also in co-operation with other institutions. A joint degree may be issued as *a.* a joint diploma in addition to one or more national diplomas, *b.* a joint diploma issued by the institutions offering the study programme in question without being accompanied by any national diploma, *c.* one or more national diplomas issued officially as the only attestation of the joint qualification in question.
44. Available in the publication referred to and at: www.enic-naric.net/documents/Recommendation-joint-degrees-2004.en.pdf.

The National Action Plans may wish to consider what measures have been or should be taken to allow national authorities to know:

−   whether higher education institutions and other competent recognition authorities comply with the Lisbon Recognition Convention and with national laws;

−   what measures could be taken if given institutions or authorities were shown consistently not to apply the Convention and/or relevant national laws.

2.4. Transparency tools for recognition

The transparent recognition of qualifications is one of the main objectives of the Bologna Process, as a key means of improving mobility within the European Higher Education Area. At European level, the European Credit Transfer and Accumulation System (ECTS) and the Diploma Supplement are key transparency tools. While the Prague Communiqué refers to "a credit system such as the ECTS or one that is ECTS-compatible", no alternative system has been developed at European level. In the Berlin Communiqué, ministers renewed their support for ECTS. However, some countries have developed national credit systems. Countries may therefore implement the ECTS either by adopting and implementing the ECTS in their national context or by specifying how their national system, provided it be based on student workload and applicable for both transfer and accumulation, articulates with the ECTS so that national credits may easily be translated into ECTS credits for mobility purposes. Other transparency tools such as the Language Portfolio are listed in the EUROPASS initiative.[45]

The National Action Plans should include

−   Plans and timetable for the implementation of the European Credit Transfer and Accumulation System (ECTS);

−   Plans and timetable for the implementation of the Diploma Supplement;

−   Plans and timetable for the implementation of possible other transparency tools.

Reference documents:
ECTS User's Guide,[46]
Diploma Supplement,[47]
Europass.[48]

2.5. Borderless/transnational education

The emergence of higher education provision not linked to national systems and often also without a clear geographical location is an important development over

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45. The web link to Europass is http://europass.cedefop.eu.int/.
46. Available at: http://europa.eu.int/comm/education/programmes/socrates/usersg_en.html.
47. Available at: www.aic.lv/ace/ace_disk/Dipl_Sup/index.htm.
48. http://europa.eu.int/comm/education/programmes/europass/index_en.html.

the past decade. The Lisbon Recognition Convention applies to programmes and institutions that are a part of the national education systems of parties, yet its provisions can be adapted to other provision, whether from the national systems of non-parties or to provision not linked to national systems. A major concern with borderless or transnational provision is that it is often difficult to assess its quality, and that opportunities for providers to undergo quality assessment may be lacking.

The national action plans could outline

- Whether there are national and/or institutional policies concerning the assessment and recognition of qualifications awarded under borderless/transnational education provision;

- What the main points of such policies are or, alternatively;

- Whether such qualifications are turned down for formal reasons, without further consideration of their content;

- Whether any action has been taking to implement the UNESCO/OECD[49] guidelines for quality provision of cross border higher education.

Reference document:
Code of Good Practice in the Provision of Transnational Education.[50]

3. Information provision

3.1. Provision of information on recognition

Provision of information on the procedures and criteria for recognition and on the education system of the country are of key importance to the mobility of students, staff and holders of qualifications. Information will often need to be adapted to specific target groups and be provided through a variety of means, including electronic means. The ENIC and NARIC Networks have established a joint website,[51] which is currently managed by the Canadian ENIC and an ENIC/NARIC Working Party. Links to the web sites of national information centres as well as other relevant pages are provided from this site.

The National Action Plans could describe

- What measures have been taken or are envisaged to improve the provision of information on recognition criteria and procedures and on the national education system;

- What timetable is envisaged for such measure;

- What bodies or institutions are responsible for the measures;

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49. www.oecd.org/dataoecd/27/51/35779480.pdf or www.unesco.org/education/guidelines_E.indd.pdf.
50. Available in the publication referred to and at: www.coe.int/T/DG4/HigherEducation/Recognition/Code%20of%20good%20practice_EN.asp#TopOfPage.
51. www.enic-naric.net/.

−   The state of electronic provision of information on recognition;
−   Whether the national information centres establish and maintain their own web pages, linked to the ENIC-NARIC website.

Reference document:
ENIC/NARIC Code of Good Practice on Information Provision.[52]

3.2. Information package for applicants

A particular point in the Recommendation on Criteria and Procedures concerns the provision of information on the rights of applicants and the criteria and procedures for recognition to all applicants, where the recommendation suggests applicants should be provided with an information package at the same time that receipt of the application is acknowledged.

The National Action Plans could consider

−   To what extent information packages are provided and;
−   If needed, how practice could be improved.

Reference document:
Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study, paragraphs 13-16, and the Explanatory Memorandum

4. Structures

4.1. National information centre

The action plan should outline the functioning of the national information centre (ENIC/NARIC) and set goals for improving the functioning of the centre. This could comprise considerations of:

−   The formal status of the centre;
−   Legal competence (e.g. advisory or decision making; academic, de jure professional, de facto professional recognition);
−   Staff and budget;
−   Capacity building in terms of expertise and service to the public;
−   Networking and co-operation at national level and internationally.

Reference document:
Joint ENIC/NARIC Charter of Activities and Services.[53]

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52. Available at: www.coe.int/T/DG4/HigherEducation/Recognition/ENIC%20NARIC%20Code%20 information%20provision_EN.asp#TopOfPage.
53. Available at: http://wcd.coe.int/com.instranet.InstraServlet?Command=com.instranet.CmdBlobGe t&DocId=822012&SecMode=1&Admin=0&Usage=4&InstranetImage=43867 as well as in the publication mentioned in above.

4.2. Co-operation recognition/quality assurance bodies

The action plan should outline how the national information centre co-operates with the body responsible for quality assurance and, if required, how this co-operation could be improved. Regardless of whether the national information centre and the QA body are located within the same organisation or in different organisations, this could comprise considerations of how

− Information is exchanged between these bodies;

− Working methods are discussed and agreed;

− Information on the outcomes of quality assessments are used in the recognition of qualifications;

− Membership of international networks and associations in recognition (e.g. ENIC and NARIC Networks) and quality assurance (e.g. ENQA) are used for the mutual benefits of both bodies.

Reference documents:
Lisbon Recognition Convention, Section VIII,
Joint ENIC/NARIC Charter of Activities and Services,
European Quality Assurance Standards.[54]

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54. Available at: www.bologna-bergen2005.no/EN/BASIC/050520_European_Quality_Assurance_ Standards.pdf.

Appendix III – Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study

Adopted by the Lisbon Recognition Convention Committee
at its second meeting, Rīga, 6 June 2001

Preamble

The Committee of the Convention on the Recognition of Qualifications concerning Higher Education in the European Region,

Considering that the aim of the Council of Europe and UNESCO is to achieve greater unity between their members, and that this aim can be pursued notably by common action in cultural matters;

Having regard to the Council of Europe/UNESCO Convention on the Recognition of Qualifications concerning Higher Education in the European Region;

Having regard to the European Cultural Convention;

Having regard to European Conventions Nos. 15 on the Equivalence of Diplomas leading to Admission to Universities, 21 on the Equivalence of Periods of University Study, 32 on the Academic Recognition of University Qualifications, 49 Protocol to the European Convention on the Equivalence of Diplomas leading to Admission to Universities and 138 on the General Equivalence of Periods of University Study as well as European Agreement No. 69 on the portability of student grants;

Having regard to the UNESCO Convention on the Recognition of Studies, Diplomas and Degrees concerning Higher Education in the States belonging to the Europe Region;

Having regard to the two declarations on the application of European Convention No. 15 and to the General Declaration on the European Equivalence Conventions;

Having regard to the Declaration of the European Ministers of Education in Bologna on 19 June 1999;

Having regard to the Diploma Supplement elaborated jointly by the European Commission, the Council of Europe and UNESCO, to the UNESCO/Council of Europe Code of Good Practice in the provision of transnational education and to the European Credit Transfer System (ECTS);

Having regard to the practical action in favour of improving the recognition of qualifications concerning higher education carried out by the Council of Europe/ UNESCO European Network of national information centres on academic recognition and mobility ("the ENIC Network");

Considering that the Council of Europe and UNESCO have always encouraged academic mobility as a means for better understanding of the various cultures and languages, and without any form of racial, religious, political or sexual discrimination;

Considering that studying or working in a foreign country is likely to contribute to an individual's cultural and academic enrichment, as well as to improve the individual's career prospects;

Considering that the recognition of qualifications is an essential precondition for both academic and professional mobility;

Recommends the governments of States party to the Convention on the Recognition of Qualifications concerning Higher Education in the European Region:[55]

i.   to take into account, in the establishment of their recognition policies, the principles set out in the appendix hereto;

ii.   to draw these principles to the attention of the competent bodies concerned, so that they can be considered and taken into account;

iii. to promote implementation of these principles by government agencies and local and regional authorities, and by higher education institutions within the limits imposed by the autonomy of higher education institutions;

iv.   to ensure that this Recommendation is distributed as widely as possible among all persons and bodies concerned with the recognition of qualifications concerning higher education;

Invites the Secretary General of the Council of Europe and the Director-General of UNESCO, as appropriate, to transmit this Recommendation to the governments of those States which have been invited to the Diplomatic Conference entrusted with the adoption of the Lisbon Recognition Convention but which have not become parties to that Convention.

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55. In this Recommendation, this Convention will be referred to as "the Lisbon Recognition Convention".

Appendix to the Recommendation on Procedures and Criteria for the Assessment of Foreign Qualifications and Periods of Study

I. General considerations

1.   The present Recommendation is adopted within the framework of the Lisbon Recognition Convention and applies to the Parties of this Convention. The principles and practices described in this Recommendation can, however, also equally well be applied to the recognition of qualifications issued in other countries under transnational education arrangements or to the recognition of qualifications in countries other than those party to the Lisbon Recognition Convention.

2.   The Recommendation codifies established best practice among credential evaluators and builds on this practice in suggesting further improvements. The provisions of the Recommendation are in particular directed at recognition cases where a complex assessment is required. It is realised that cases involving well-known qualifications may be treated in a simpler way.

II. Definitions

3.   Terms defined in the Lisbon Recognition Convention are used in the same sense in the present Recommendation, and reference is made to the definition of these terms in Section I of the Convention. Terms that specifically refer to the provision of transnational education are defined in the UNESCO/Council of Europe Code of Good Practice in the Provision of Transnational Education.

III. General principles

Holders of foreign qualifications shall have adequate access, upon request, to an assessment of their qualifications.

The provisions referring to the assessment of foreign qualifications shall apply, *mutatis mutandis*, to the assessment of periods of study.

6.   Procedures and criteria for the assessment of foreign qualifications should be transparent, coherent and reliable, and they should periodically be reviewed with a view to increasing transparency, taking account of developments in the education field and eliminating requirements leading to undue complications in the procedure.

7.   In the assessment of foreign qualifications concerning higher education, the international and national legal frameworks should be applied in a flexible way with a view to making recognition possible. In cases where existing national laws conflict with the present Recommendation, States are encouraged carefully to consider whether national laws may be amended.

8.   Where, after thorough consideration of the case, the competent recognition authority reaches the conclusion that recognition cannot be granted in accordance with the applicant's request, alternative or partial recognition should be considered.

9.   In all cases where the decision is different from the recognition requested by the applicant, including in cases where no form of recognition is possible, the competent recognition authority should inform the applicant of the reasons for the decision reached and his or her possibilities for appealing against it.

10.   The assessment criteria contained in this Recommendation have been drawn up with a view to increasing the consistency of the procedures and use of criteria for the assessment of foreign qualifications, thus assuring that similar recognition cases will be considered in reasonably similar ways throughout the European region. It is nevertheless realised that a margin of flexibility in making recognition decisions is essential, and that decisions will to some extent vary according to national systems of education.

11.   The procedural recommendations contained in the present document aim at making assessment procedures more consistent and transparent and at assuring all applicants a fair consideration of their application. The recommendations on procedures and criteria to be followed are equally valid regardless of whether the outcome of the assessment procedure is:

(i)   a recognition decision;

(ii)   advice to the competent recognition authority making the decision;

(iii) a statement addressed to individual(s), institution(s), potential employer(s) or others.

It is recommended that applicants have access to an assessment relevant to the case.

12. While the aim of assessments should be to assess applicants' foreign qualifications in qualitative terms, it is realised that quantitative criteria will have to be used to a certain extent. Their use should, however, be limited to cases where quantitative criteria are relevant to quality and may supplement qualitative criteria.

IV. Assessment procedures

Information to applicants

13.   The competent recognition authority should give all applicants an acknowledgement of the receipt of their application.

14.   National information centres, competent recognition authorities and other assessment agencies should publish standardised information on the procedures and criteria for the assessment of foreign qualifications concerning higher education. This information should automatically be given to all applicants as well as to persons making preliminary inquiries about the assessment of their foreign qualifications.

15.   The time normally required to process recognition applications, counted from such time as all relevant information has been provided by applicants and/or higher education institutions, should be specified to applicants. Applications should be

processed as promptly as possible, and the time of processing should not exceed four months.

16. National information centres, competent recognition authorities and other assessment agencies should provide advice to individuals enquiring about the possibilities and procedures for submitting formal applications for the recognition or assessment of their foreign qualifications. As appropriate, in the best interests of the individual, informal advice should also be provided in the course of, as well as after, the formal assessment of the applicants' qualifications, if required.

17. National information centres and competent recognition authorities should draw up an inventory of typical recognition cases and/or a comparative overview of other education systems or qualifications in relation to that of their own country as an aid in making recognition decisions consistent. They should consider whether this information could be made available to applicants with the proviso that this information serve only as an indicative guide, and that each application will be assessed on an individual basis.

Information on the qualification for which recognition is sought

18. The responsibility for providing information on the qualification for which recognition is sought is shared by applicants, higher education institutions at which the qualifications in question were awarded and the competent recognition authority undertaking the assessment as specified in the Lisbon Recognition Convention, in particular in its Articles III.3 and III.4. Higher education institutions are strongly encouraged to issue a Diploma Supplement in order to facilitate the evaluation of the qualifications concerned, in particular by credential evaluators and potential employers.

19. In cases where refugees, persons in a refugee-like situation or others for good reason cannot document the qualifications they claim, credential evaluators are encouraged to create and use a Background Paper giving an overview of the qualifications or periods of study claimed with all available documents and supporting evidence.

Fees

20. The competent recognition authorities and other assessment agencies should consider whether it is possible to provide for assessment of foreign qualifications as a public service free of charge. Where this is not feasible, fees should be kept as low as possible and should not be so high as to constitute a barrier to the assessment of foreign qualifications.

21. In deciding the size of any fees charged, due account should be taken of the cost of living and the level of salaries and student support in the country concerned. Special measures aimed at low income groups, refugees and displaced persons and other disadvantaged groups should be considered in order to ensure that no applicant

is prevented from seeking recognition of his or her foreign qualifications because of the costs involved.

22. Any fees charged for the assessment of foreign qualifications should, without exception, be payable in the currency of the country in which the assessment is undertaken.

Translation

23. Requirements for the translation of documents should be carefully weighed and clearly specified, especially as concerns the need for authorised translations by sworn translators. It should be considered whether requirements for translation could be limited to key documents, and whether documents in certain foreign languages, to be specified by the competent recognition authority, could be accepted without translation. The countries concerned are encouraged to revise any current laws preventing the acceptance of documents in non-national languages without translation. Attention is drawn to the fact that the use of the Diploma Supplement may help reduce the need for translation of other key documents.

24. As a rule, titles of foreign qualifications should be provided in the original language, without translation.

Verification of the authenticity of documents

25. In view of the increasing occurrence of falsified diplomas and other documents, verification of the authenticity of documents is becoming increasingly important. Such verification seeks to establish:

(i) whether the documents in question are genuine, i.e. whether they have been issued by the institution indicated in the document and whether they have not subsequently been unlawfully altered by the applicant or others; and

(ii) whether the documents in question have in fact been rightfully issued to the applicant.

26. While the need to establish the authenticity of documents as a part of the assessment procedure is therefore very real, this need should nonetheless be balanced against the burdens placed upon applicants. The basic rules of procedure should assume that most applicants are honest, but they should give the competent recognition authorities the opportunity to require stronger evidence of authenticity whenever they suspect that documents may be forged. While certified photocopies of documents will be sufficient in most cases, the competent recognition authorities should be in a position to require original documents where this is considered necessary for the purpose of detecting or preventing the use of forged documents.

27. States are encouraged to review any national laws requiring overly complicated and costly authentification procedures, such as full legalisation of all documents. Modern communications make it easier to verify the authenticity of documents in less cumbersome ways, and competent recognition authorities and higher education

institutions of home countries are encouraged to react swiftly and positively to requests for direct information on documents claimed to have been issued by them.

28. In the case of refugees, displaced persons and others who for good reasons, and in spite of their best persistent efforts, are unable to document their claimed qualifications, it should be considered whether alternative ways of recognising these qualifications may be found. Such measures should be adapted to the circumstances of their recognition application and could include ordinary or specially arranged examinations, interviews with staff of higher education institutions and/or the competent recognition authority and sworn statements before a legally competent authority.

V. Assessment criteria

Status of the institution

29. In view of the wide diversity of higher education institutions and of the developments in transnational education, the status of a qualification cannot be established without taking into account the status of the institution and/or programme through which the qualification was awarded.

30. The credential evaluator should seek to establish whether the higher education institution belongs to the higher education system of a State party to the Lisbon Recognition Convention and/or belonging to the European Region. In the case of qualifications awarded by higher education institutions established through transnational arrangements, the credential evaluator should analyse these arrangements on the basis of the principles stipulated in the UNESCO/Council of Europe Code of Good Practice in the provision of transnational education.

31. Some countries have established a system of formal assessment of their higher education institutions and programmes. When evaluating qualifications from such systems, credential evaluators should take due account of the results of the formal assessment process.

Assessment of individual qualifications

32. Recognition of foreign qualifications may be sought for a variety of purposes. The assessment should take due account of the purpose(s) for which recognition is sought, and the recognition statement should make clear the purpose(s) for which the statement is valid.

33. Before undertaking the assessment, the competent recognition authority should establish which national and international legal texts are relevant to the case, and whether these require any specific decision to be reached or procedure to be followed.

34. The assessment should also take into account past practice in similar recognition cases, in order to ensure consistency in recognition practice. Past practice should be a guide, and any substantial change of practice should be justified.

35. The assessment of a foreign qualification should identify the qualification in the system of the country in which recognition is sought which is most comparable to the foreign qualification, taking into account the purpose for which recognition is sought. In the case of a qualification belonging to a foreign system of education, the assessment should take into account its relative place and function compared to other qualifications in the same system.

36. Qualifications of approximately equal level may show considerable differences in terms of content, profile and learning outcomes. In the assessment of foreign qualifications, these differences should be considered in a flexible way, and only substantial differences in view of the purpose for which recognition is sought (e.g. academic or de facto professional recognition) should lead to partial recognition or non-recognition of the foreign qualifications.

37. Recognition of foreign qualifications should be granted unless a substantial difference can be demonstrated between the qualification for which recognition is requested and the relevant qualification of the State in which recognition is sought. In applying this principle, the assessment should seek to establish whether:

(a) the differences in learning outcomes between the foreign qualification and the relevant qualification of the country in which recognition is sought are too substantial to allow the recognition of the foreign qualification as requested by the applicant. If so, the assessment should seek to establish whether alternative, partial and/or conditional recognition may be granted;

(b) the differences in access to further activities (such as further study, research activities, the exercise of gainful employment) between the foreign qualification and the relevant qualification of the country in which recognition is sought are too substantial to allow the recognition of the foreign qualification as requested by the applicant. If so, the assessment should seek to establish whether alternative, partial and/or conditional recognition may be granted;

(c) the differences in key elements of the programme(s) leading to the qualification in comparison to the programme(s) leading to the relevant qualification of the country in which recognition is sought are too substantial to allow the recognition of the foreign qualification as requested by the applicant. If so, the assessment should seek to establish whether alternative, partial and/or conditional recognition may be granted. The comparability of programme elements should, however, be analysed only with a view to the comparability of outcomes and access to further activities, and not as a necessary condition for recognition in their own right;

(d) a credential evaluator can document that the differences in the quality of the programme and/or institution at which the qualification was awarded in relation

to the quality of the programmes and/or institutions granting the similar qualification in terms of which recognition is sought are too substantial to allow the recognition of the foreign qualification as requested by the applicant. If so, the assessment should seek to establish whether alternative, partial and/or conditional recognition may be granted.

38.   Where formal rights attach to a certain foreign qualification in the home country, the qualification should be evaluated with a view to giving the holder comparable formal rights in the host country, in so far as these exist and they arise from the knowledge and skills certified by the qualification.

39.   The recognition of qualifications issued several years ago may be more problematic than the recognition of recent qualifications. To what extent a qualification is outdated will depend on the field concerned as well as the activities undertaken by the applicant since the qualification was issued. In general terms, older qualifications should be recognised along the same lines as similar qualifications issued in the country in which recognition is sought. It may be considered whether relevant work experience may compensate for updated qualifications.

40.   Competent recognition authorities and other assessment agencies should be encouraged to focus on the learning outcomes and competencies, as well as the quality of the delivery of an educational programme and to consider its duration as merely one indication of the level of achievement reached at the end of the programme. The assessment process should acknowledge that recognition of prior learning, credit transfer, different forms of access to higher education, double degrees and life-long learning will all shorten the duration of some academic qualifications without diminishing the learning outcomes and a decision not to grant recognition should not be motivated by duration alone.

41.   The assessment of a foreign qualification should focus on the qualification for which recognition is sought. Previous levels of education should be considered only where these levels have a serious bearing on the outcome of the assessment and should, as far as possible, be limited to qualifications of a level immediately preceding the qualification for which recognition is sought.

42.   In undertaking the assessment, the competent recognition authorities and other assessment agencies should apply their know-how and best professional skills and take note of all relevant published information. Where adequate information on the learning outcomes embodied in the qualification is available, this should take precedence in the assessment over consideration of the education programme which has led to the qualification.

VI. The outcome of the assessment

43.   Depending on national law and practice, the outcome of the assessment of a foreign qualification may take the form of:

(a)   a recognition decision;

(b) advice to another institution, which will then make the recognition decision;

(c) a statement to the applicant or to whom it may concern (e.g. current or prospective employers, higher education institutions etc.) providing a comparison of the foreign qualification with similar qualifications in the country in which recognition is sought, without being a formal recognition decision.

44. The ENIC Network as well as competent authorities should elaborate models for standardised assessment statements at European and/or national level. To facilitate international recognition, assessment agencies should use these standardised statements as far as possible.

45. Where recognition cannot be granted according to an applicant's request, the competent recognition authority or assessment agency should, as far and as precisely as possible, assist the applicant in identifying remedial measures the applicants may undertake in order to obtain recognition at a later stage.

Appendix IV – Explanatory memorandum to the Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study

Preamble

The Preamble builds on the existing legal framework for the recognition of qualifications concerning higher education, as elaborated within the frameworks of the Council of Europe and of UNESCO (as far as the latter applies to the Europe Region). Specific attention is drawn to the Convention on the Recognition of Qualifications concerning Higher Education in the European Region, elaborated jointly by both Organisations and adopted on 11 April 1997. This Convention entered into force on 1 February 1999. The Preamble also builds on the most important developments in the international recognition of qualifications over the past years, including the outcomes of the Conference on Recognition of Higher Education Qualifications: Challenges for the Next Decade, organised by the Higher Education and Research Committee of the Council of Europe (CC-HER) (Malta, 26-28 October 1994) and the seminars on the methodology of credentials evaluation organised by the European Association for International Education (EAIE) and NAFSA: Association of International Educators in 1994-95. In the case of qualifications issued through transnational arrangements, the Preamble builds on the provisions of the UNESCO/ Council of Europe Code of Good Practice in the Provision of Transnational Education.

I. General principles

Paragraphs 4-11

The Recommendation clearly underlines the right of applicants to having their foreign qualifications assessed according to transparent, coherent and reliable procedures and criteria.

As far as possible, competent recognition authorities should strive to recognise applicants' foreign qualifications. Where this is not possible, the Recommendation urges the competent recognition authorities to consider alternative forms of recognition. Such alternative recognition may include:

(i)   recognition of the foreign qualification as comparable to a qualification of the host country, but not to that indicated by the applicant;

(ii) partial recognition of the foreign qualification;

(iii) full or partial recognition of the foreign qualification subject to the applicant successfully taking additional examinations or aptitude tests;

(iv) full or partial recognition of the foreign qualification at the end of a probationary period, possibly subject to specified conditions.

The grant of partial recognition or recognition subject to the fulfilment of specific conditions does not, however, imply an automatic right to admission to any courses designed to help applicants remedy deficiencies with a view to obtaining recognition.

Only when the competent recognition authority finds it impossible to grant even an alternative form of recognition should an application be rejected outright. It should be kept in mind that in some cases, the absence of recognition may be "fair recognition" on the evidence of the case.

Where the recognition decision is different from the decision requested by the applicant, the competent recognition authority has a special obligation to state the reasons for its decision and to inform applicants of their possibilities for making an appeal against the decision. This is important both to allow applicants to make an appeal against the decisions and to enable applicants to undertake remedial measures with a view to obtaining recognition at a later stage. This should in no way prevent competent recognition authorities from stating their reasons for granting recognition.

Paragraph 12

There is an inherent dilemma in specifying criteria for the assessment of foreign qualifications. While the aim of an assessment is to assess the foreign qualification in qualitative terms, the assessment cannot be undertaken without to some extent relying on both qualitative and quantitative criteria. It is, however, important that the criteria used be chosen because of their suitability in indicating the quality of the qualification in question and the applicant's ability to undertake the activity for which recognition is sought (e.g. further study, research, gainful employment). For example, students who have obtained good study results (grades) may be considered to have considerable potential for learning and personal development, even if the qualifications for which they seek recognition have been earned in an education system or at an institution which is considered to be of substantially lower quality than the education system of the host country. In this case, the result of the assessment may depend on whether recognition is sought for the purpose of further study or for the purpose of entry into the labour market. In the former case, it may be easier to recognise the qualifications, since the applicants may be expected to improve their qualifications and reach their true potential in the course of further study. In the latter case, it may be more difficult to grant recognition, since the qualifications will be the basis for an activity which may have a direct impact on other citizens, and since there is no guarantee that the qualifications will be improved in the course of the exercise of this activity in the labour market. For the latter form of recognition, the duration and content of practice periods may also be of importance.

The main difficulty, to which there is no obvious answer, consists in reconciling the desire for an assessment of quality with the requirement for transparency and accountability, which implies the use of "objective" criteria. In no case should a recognition decision be based on only a limited number of quantitative criteria, such as length of study, without some attempt being made to assess the quality of applicants' qualifications. To an extent, substantial differences according to quantitative criteria may, however, be taken as an indication of a difference in quality.

II. Assessment procedures

Paragraph 14

The paragraph concerns the information which should be provided to applicants by national information centres and competent recognition authorities upon receipt of the application. The standardised information should deal with at least the following elements:

(i)   the documentation required, including requirements as to the authentication and translation of documents;

(ii) a description of the assessment process, including the role of the national information centre, other assessment agencies and higher education institutions;

(iii) a description of the assessment criteria;

(iv) the status of recognition statements;

(v)   the approximate time needed to process an application;

(vi) any fees charged;

(vii) a reference to the national laws and international conventions and agreements which may be relevant to the assessment of foreign qualifications;

(viii) the conditions and procedures for appealing against a recognition decision, according to national legislation.

In principle, recognition decisions should be open to appeal, and it is the duty of the competent recognition authority to inform applicants of the modalities of such appeals, including its formal aspects, such as deadlines. It is recommended that this information be provided already at the receipt of the application, partly to provide as complete a set of information as possible to applicants, and partly to avoid a direct linkage between the information on the outcome of the application and the possibilities for appeal which may be taken as an implicit encouragement to appeal even in cases where an appeal would have little chance of being upheld. Assessment agencies may consider whether to require applicants to sign an acknowledgement confirming that the information has been received, and that the applicant has acquainted himself or herself with the possibilities and procedures of appeal.

Paragraph 15

This paragraph underlines the duty of the competent recognition authority to specify its normal time limits for processing recognition applications, keeping to these limits and informing applicants in case of delay. It also specifies the "starting point" for counting the time limits, i.e. from the time all relevant information has been received by the competent recognition authority. While all assessment should be undertaken and completed as promptly as possible, it should be pointed out that any assessment taking more than four months could seriously delay applicants' further study, or their gainful employment, or oblige them to undertake additional studies to meet requirements which the assessment may subsequently find that they have already satisfied through their foreign qualifications. Four months should therefore be considered as the maximum time limit for processing recognition applications; uncomplicated cases should, as a rule, be evaluated faster.

Paragraph 17

The consistency of recognition decisions is an important element in assuring transparent and coherent treatment of applications for the recognition of foreign qualifications. It would be unfortunate if similar recognition cases were handled in substantially different ways and substantially different decisions were reached. An overview of typical recognition cases may help in assuring the required consistency.

The question of whether to make information available to applicants is somewhat complicated. On the one hand, such information may give applicants an indication of what they can realistically expect and help them formulate their application. It may also be of help to applicants in considering whether to make an appeal against a decision. On the other hand, applicants may wrongly understand the typical cases to provide a legal precedent for "automatic" recognition of their own qualifications. It is therefore essential that information on typical recognition cases provided to applicants be accompanied by a clear explanation of the function of this information, underlining that in all cases an individual assessment of the application is undertaken.

Paragraph 18

Responsibility for providing information on the qualification for which recognition is sought is shared:

(a) the applicants bear the main responsibility for providing the information required by the competent recognition authority;

(b) higher education institutions at which the qualifications were earned have a duty to provide applicants and/or the competent recognition authority with information about their qualifications as well as other relevant information (such as information on the qualifications structure, course content, etc.).

Higher education institutions should be encouraged to make use of instruments devised to explain the content of foreign qualifications, such as the UNESCO/ Council of Europe Diploma Supplement and information on credit accumulation and transfer systems, such as the ECTS.[56] The duty of higher education institutions may be limited to responding to requests by applicants and/or the competent recognition authority undertaking the assessment;

(c) the competent recognition authority is responsible for maintaining a system of information on foreign education systems and qualifications in the area of its competence.

It should be underlined that the competent recognition authorities should provide applicants with a complete overview of the pieces of information needed to undertake the assessment. Only in exceptional cases should the competent recognition authority ask for information in addition to what is specified in this overview, and in no case should requests for additional information be used as a means of prolonging or delaying the assessment concerned. Applicants as well as higher education institutions have a duty to provide all information requested within a reasonable deadline specified by the competent recognition authority.

Paragraph 19

The Background Paper is intended to be a tool:

− for the credential evaluator to reconstruct the educational background of the refugee in order to facilitate the (future) assessment;

− for the refugee to affirm his or her academic achievements towards other evaluating bodies, like universities and employers, in order to gain access to further studies or appropriate employment.

Applications from persons in a refugee-like situation or others who for good reason cannot document their qualifications should be treated in the same way.

The Background Paper itself is not an evaluation, but an authoritative description or reconstruction of the academic achievements linked to the available documents and supporting evidence.

The Background Paper is:

1. an overview of the claimed educational background with the available documents and supporting evidence;

2. a checklist, based upon the model of the Diploma Supplement, used by the credential evaluator to add more relevant information.

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56. European Credit Transfer System.

Example of overview

Educational Background	
Qualification	Evidence
Secondary education	Diploma
Higher education – first degree	Student ID + transcript of 1st year
Higher education – second degree	No educational documents, but teacher statement + employment contract

Paragraphs 20-22

Fees may constitute an impediment to recognition. If the assessment of foreign qualifications cannot be provided free of charge, fees should therefore be kept as low as possible. It is recalled that any fees charged by the competent recognition authority will be additional to any costs of translating and/or certifying documents. The provisions of the present Recommendation are especially important in view of the increasing tendency for public bodies to charge user fees.

Fee practices vary considerably throughout the European region. It is hardly possible to give precise indication of acceptable fee levels, as local conditions such as the cost of living and the level of salaries and student support must be taken into account. Nevertheless, in some cases the fees charged must be considered as excessive. It is, for example, unreasonable that the assessment of a foreign qualification should cost a substantial part of an average monthly salary in the public sector.

Paragraph 23

The requirements for complete information should be carefully weighed against the burdens the fulfilment of this need places upon applicants, specifically as concerns requirements for authentication and translation of documents, which tend to be time-consuming and costly. A consideration of requirements for authentication should weigh the necessity of minimising the risk of fraud against the need to reduce the burden on honest applicants. It is suggested that it may, in most cases, be sufficient to require authentication of key documents, such as diplomas, transcripts and birth certificates. It should also be considered whether certified photocopies, rather than originals, may be required. It is important that all requirements be clearly specified to applicants.

In the case of translation requirements, it should also be considered whether these may be limited to key documents. It may, for example, not be necessary for the applicant to provide detailed translation of curricula. It should also be considered whether it is strictly necessary to require translations to be carried out by certified translators. Where this requirement is maintained, the competent recognition authority should provide applicants with lists of accepted translators. It should

further be considered whether certain documents could be accepted without translation. This could apply to documents issued in widely spoken languages, in languages which are linguistically close to the language(s) of the host country, languages widely understood in the host country, and/or languages in which staff members of the competent recognition authority have sufficient competence.

Paragraph 24

The reason why titles of foreign qualifications should not be translated is that a translation in this case implies an assessment, and this assessment should only be undertaken by qualified recognition experts. The Diploma Supplement revised jointly by the European Commission, the Council of Europe and UNESCO as well as credit accumulation and transfer systems have been devised to explain the content of qualifications without translating or evaluating them. Attention is drawn to the fact that transliteration is distinct from translation. Transliteration implies reproducing the sounds rendered by one alphabet or writing system in another alphabet or writing system, such as rendering a word written in the Cyrillic alphabet or in Japanese characters in the Latin alphabet. Transliteration enables readers unfamiliar with the alphabet or writing system of the original language to identify words or expressions from that language and should be undertaken using standard systems of transliteration where they exist.

Verification of the authenticity of documents

Paragraphs 25-28

The problem of falsified documents is becoming increasingly serious. It is therefore necessary to underline the need to verify the authenticity of documents submitted by applicants, as well as the identity of the applicants themselves. At the same time, however, it is necessary to maintain a balance between the need for verification and the need to avoid placing undue burdens on the majority of applicants, who submit authentic documents, and who should be treated according to the basic judicial rule of being "innocent until proven guilty". It is therefore necessary to give competent recognition authorities the possibility to require particularly severe proofs of authenticity, such as the submission of original documents, in cases where forgery is suspected. Another possibility in such cases is to require copies certified by an original signature and/or stamp of the institution having issued the qualifications. Higher education institutions should reply promptly to requests for such certification, which should be issued without fees, if possible, or at any rate at moderate fees.

At the same time, some laws on the verification of documents, such as those which require full legalisation of all documents, date from a time when international communication was much more difficult than today. While they may have been justified at the time, today there are better and more efficient ways of verifying the authenticity of documents through direct contact with competent recognition authorities and higher education institutions from which the documents are claimed to originate.

States are therefore encouraged to review their national laws with a view to simplifying and modernising their rules on the verification of the authenticity of documents.

III. Assessment criteria

Paragraphs 29-31

In view of the increasing diversification of higher education systems, and of higher education institutions through transnational arrangements, including the establishment of a large number of private higher education institutions, qualifications cannot be properly evaluated without taking into account the institution which has issued the qualifications. At the same time, national laws and practices for the assessment of higher education institutions vary very widely. Consequently, the kind of information which may be obtained on higher education institutions also varies. Section VIII of the Lisbon Recognition Convention outlines the kind of information which should be provided by Parties which have established a system of formal assessment of higher education institutions and programmes, as well as the kind of information which should be provided by Parties which have not established such a system. The UNESCO/Council of Europe Code of Good Practice in the Provision of Transnational Education outlines the principles which should be respected by institutions and organisations involved in the provision of educational services through transnational arrangements and they should be applied in the assessment of academic qualifications.

Paragraph 32

There is a direct connection between the assessment of foreign qualifications and the purpose(s) for which recognition is sought. For example, a given qualification may be adequate for the purpose of further study, but not for the purpose of employment at a given level. Conversely, a given qualification may be adequate for the purpose of employment, but not for further study, e.g. at doctoral level. This could, for example, be the case if a research component, the writing of an independent thesis or another form of substantial independent work were totally lacking in the foreign qualification, and such a component were a requirement for access to doctoral studies in the home country. This implies that a recognition statement should make it clear for which purpose(s) it is valid, and a renewed assessment should be undertaken if recognition is sought for other purpose(s) than those (that) covered by a previous statement.

Qualifications may serve a wide range of purposes, some examples of which are:

(a)   general access to higher education;

(b)   restricted access to higher education (i.e. access restricted to certain parts of the higher education system, such as certain technical studies);

(c)   general access to further studies at a given level (such as doctoral studies or second degree studies);

(d)   restricted access to further studies (e.g. access to further technical studies);

(e)   access to professional training;

(f)   general access to the labour market (i.e. as a qualification for a wide range of positions at a given level);

(g)   access to a specialised area of the labour market;

(h)   access to a regulated profession.

Paragraph 33

Some examples of national or international legal texts which may apply to applications for the recognition of foreign qualifications are:

(a)   national laws and regulations on qualifications concerning higher education;

(b)   national laws and regulations concerning the exercise of gainful employment, including laws and regulations on regulated professions;

(c)   Council of Europe and UNESCO Conventions;

(d)   Council of Europe and UNESCO Recommendations and codes of good practice;

(e)   European Union directives, including those on professional recognition;

(f)   other European Union rules and regulations, e.g. those governing the recognition of qualifications earned in the framework of EU mobility programmes such as SOCRATES and, previously, ERASMUS;

(g)   international agreements established in the framework of other international Organisations, such as the Nordic Council of Ministers;

(h)   bilateral or multilateral agreements between States;

(i)   bilateral or multilateral agreements between higher education institutions.

Not all such texts have the same legal value; their relative legal status must therefore also be taken into account.

Paragraph 36

Differences in the content and profile of qualifications may concern e.g. the degree of specialisation or general education, requirements for independent written work (including theses), the inclusion of practice periods, laboratory experience or similar requirements (e.g. in medical or natural sciences), or the inclusion of non-academic elements (such as sports or vocational training) in the qualification.

What may be defined as "substantial differences", which may lead to partial recognition or to non-recognition, will to a large extent depend on the purpose(s) for which recognition is sought, for example recognition for the purpose of pursuing further studies or for access to a non-regulated professional activity. In some contexts, a broadly based education may be desirable, whereas, in other contexts, a considerable degree of specialisation may be required. In another example, a thesis may be an essential requirement for a given qualification. Applicants whose foreign qualification satisfies the teaching requirements for the qualification in the host country, but do not include a thesis, may be required to submit a thesis before full recognition can be granted.

Examples of learning outcomes may be one or more of the following:

(a) broad knowledge of a specific subject;

(b) understanding of research results in a specific subject;

(c) ability to analyse and solve problems;

(d) ability to communicate effectively – orally and in writing – with diverse groups on complex issues;

(e) ability to apply research results with routine skills and in a fixed domain;

(f) ability to apply research results and to adapt routine skills to new domains;

(g) ability to conduct research;

(h) ability to discern conflicting theories or paradigms;

(i) ability to pursue a specific occupation or profession at operational, management or technology development level.

Paragraph 37

The paragraph underlines that if a competent recognition authority wishes to withhold recognition – entirely or partially – of a foreign qualification, it is the duty of the competent recognition authority to demonstrate that this decision is justified. This is in accordance with the principles of the Lisbon Recognition Convention as well as the European Union Directives on professional recognition. The "relevant qualification of the country in which recognition is sought" may be indicated by the applicant requesting recognition or, if the applicant has given no indication, by the competent recognition authority, taking into account the purpose for which recognition is sought.

Paragraph 38

Formal rights are not totally distinct from, but also not totally identical to, the purpose for which recognition is sought. Formal rights obtained through a qualification may, for example, be the right to access to higher education (i.e. the right to be considered for participation in higher education), the right to access to doctoral

studies, the right to use a given title or the right to apply for professional recognition. The latter will in many, perhaps most, cases also be subject to non-educational requirements, such as practice periods (where these are considered as distinct from, rather than as a part of, the education programme leading to the qualification) or nationality, residence or language requirements. The assessment of foreign qualifications for professional purposes is covered by this recommendation only in so far as the assessment concerns the knowledge and skills certified by the qualification concerned for the purpose of professional recognition.

The Recommendation suggests that where a qualification gives its holder certain formal rights in the home country, the assessment should seek to assess whether the qualification can give the holder comparable formal rights in the host country. It is, however, realised that national practices with regard to granting formal rights through educational qualifications may vary. This provision is applicable only to the extent that these formal rights may be obtained through a qualification issued in the home country.

Paragraph 39

A qualification certifies a certain competence obtained at a certain time. The value of a qualification may diminish over time, or be entirely lost, either because the holder of the qualification has not kept up the competence acquired by undertaking activities relevant to the field, or because significant new knowledge has been gained in the field, and the holder is not adequately acquainted with these developments. To what extent a qualification becomes outdated may depend on the field of knowledge concerned.

The recognition of older qualifications can therefore be problematic, and there is no standard solution to the problem. However, the problem is not limited to foreign qualifications. If older qualifications from the country in which recognition is sought are still recognised, similar foreign qualifications of similar age should also be recognised for the same purpose. If, however, qualifications from the country in which recognition is sought are considered outdated and are no longer recognised, similar foreign qualifications should be considered in the same way.

Paragraph 40

Length of study is one of the most frequently used assessment criteria, and experience shows that it is also among the criteria most easily accepted by applicants whose qualifications are recognised only partially or not at all. The concept of "length of study" is somewhat problematical because, while generally expressed in terms of years or semesters of study, there may be differences, between countries and between individual institutions, in the number of weeks which make up a semester or a year of study and in the number of working hours in a week of study as well as in the distribution of those hours in terms of teaching, self study and other learning activities (practice periods, laboratory work, etc.). Substantial differences in this respect could reduce the difference between two qualifications of seemingly

different "length", or they could increase the difference between qualifications of seemingly similar "length". "Length of study" should therefore not be considered a uniform concept, and it should not be used as the sole criterion in the assessment of foreign qualifications.

In general terms, however, length of study may be taken to give an indication of the level of a qualification. The wider the difference in the length of study normally required to obtain various qualifications, the more likely it would seem that these qualifications are not of the same level. The question of what constitutes a substantial difference in the length of study must also be seen in relation to the stipulated length of study for the qualification in question. A difference of one year is a clearer indication with regard to a study programme the stipulated length of which is, say, four years, than with regard to an entire primary and secondary education programme the stipulated length of which is, say, twelve years. Therefore, it is suggested that a difference of one year or more may be considered substantial in the case of most higher education programmes, while the difference in the length of programmes leading to access qualifications should be two years or more in order to be considered substantial. It should also be underlined that while the differences indicated may be considered substantial, they must not necessarily be so considered, nor should other factors necessarily be excluded from the assessment. In cases where the differences in length of study are less than indicated here, these differences should not be considered sufficient by themselves to justify a decision not to recognise the qualification.

It should also be noted that "level" and "quality" are different concepts. A given secondary-school leaving certificate may be of excellent quality for the purpose of general access to higher education at starting level, which is one of its main purposes, and a student holding that qualification with good grades may be assumed to have an excellent potential for academic studies. The student will, nonetheless, not have acquired the academic level necessary for access to advanced studies.

Paragraph 41

The paragraph underlines the need to focus any assessment of a foreign qualification on that qualification. Taking account of previous levels of education should be an exception rather than a rule. For example, in the case of someone applying for recognition of a doctoral degree, the applicant's school-leaving qualifications should not be a part of the assessment. Previous levels of qualifications should only be considered in exceptional cases, and the assessment should as far as possible be limited to the level immediately preceding the qualification for which recognition is sought. The most pertinent example is perhaps that deficiencies in an applicant's secondary school leaving qualifications may affect his or her first degree qualifications, or partial qualifications at first degree level, to such an extent that full recognition at first degree level cannot be granted. However, it should be emphasised that this would be an exceptional situation.

Paragraph 42

The paragraph concerns the efforts which competent recognition authorities and other assessment agencies can reasonably be expected to undertake in the assessment of individual cases. They should apply all their professional skills and take account of the relevant literature, but they are not required to conduct in-depth research on the comparability of learning outcomes and/or fitness for further activities. In evaluating a foreign qualification, more emphasis should be given to the outcome of the education process (i.e. the knowledge and skills certified by the qualification and the ability to undertake further activities) than to the process itself (i.e. the education programme through which the qualification was earned).

IV. The outcome of the assessment

Paragraph 45

The indications referred to in this paragraph concern additional education applicants may take in order to improve their chances of obtaining recognition at a later stage. The competent recognition authorities should assist these applicants by obtaining as precise indications as possible on measures to be taken or, as appropriate, refer applicants to relevant written information or contact persons at higher education institutions or other relevant bodies.

Schematic outline of the recommended procedure for the assessment of foreign qualifications

In the following, a schematic outline will be given of the recommended procedure for the assessment of foreign qualifications or periods of study. This is intended as a summary checklist. In practice, the sequence of the steps outlined may vary, or several steps may be taken simultaneously.

Step 1

Receipt of the inquiry or application by the competent recognition authority.

Acknowledgement of receipt; information to the applicant about procedures and criteria.

Proceed to step 2.

Step 2

Verification of whether all necessary information is supplied.

If no: gather further information from the applicant or higher education institution(s)
If yes: proceed to step 3

Step 3

Verification of whether the applicant's qualification is authentic, and whether the documents submitted have in fact been rightfully issued to the applicant. [In this the competent authority may seek the assistance of the national information centre]

If no: (i.e. the qualification is false): recognition refused.
If yes: proceed to step 4.

Step 4

Verification of whether the institution and/or programme having issued the qualification is recognised as belonging to a system of higher education. In the case of transnational education, verification of whether the awarding institution complies with the principles stipulated in the UNESCO/Council of Europe Code of Good Practice in the Provision of Transnational Education.

If no: recognition would normally not be granted.
If yes: proceed to step 5.

Step 5

Assessment of the foreign qualification, taking into account:

(i)   the purpose for which recognition is sought;

(ii) formal regulations:

    (a) national laws;

    (b) international Conventions, directives, Recommendations, good practice, etc.;

(iii) past practice in similar cases;

the content of the qualification, to the extent that this completes items (i) to (iii);

information and advice from other ENICs, higher education institutions or other sources.

The assessment should seek to answer questions such as:

(a)   are the differences in (targeted or achieved) learning outcomes so substantial that the foreign qualification cannot be fully recognised? If so, is it possible to grant alternative or partial recognition?

(b)   are the differences in the further activities for which the foreign and the home country qualifications prepare so substantial that full recognition is not possible? If so, is alternative or partial recognition possible?

(c)   are the differences in key elements of the programme leading to the qualification so substantial in relation to similar programmes in the host country that full recognition cannot be granted in view of the purpose for which recognition is sought? If so, is alternative or partial recognition possible?

(d) is the quality of the programme or the institution at which the qualification was earned so different from similar programmes or institutions in the host country that full recognition is not possible? If so, is alternative or partial recognition possible?

Step 6

The assessment statement on the foreign qualification is issued (the outcome of the assessment). Depending on national laws and practice, this may take the form of:

(i)　advice to another institution, which will then make the decision;

(ii)　a decision;

(iii)　a statement to the applicant or to whom it may concern (e.g. current or prospective employers, higher education institutions, etc.).

If positive decision by (i) or (ii): recognition granted, applicant satisfied.

If negative decision: the reason(s) for the decision should be clearly stated and the applicant informed of his or her possibilities for appeal.

The applicant may:

(a) accept the verdict;

(b) appeal the verdict.

Appendix V – Standards and Guidelines for Quality Assurance in the European Higher Education Area

Note*: the Standards and Guidelines for Quality Assurance in the European Higher Education Area were developed by the so-called "E-4 group" made up of ENQA – the European Association for Quality Assurance in Higher Education – the European University Association (EUA), the European Student Union (now ESU; then ESIB – National Unions of Students in Europe) and EURASHE – the European Association of Institutions in Higher Education. The Standards and guidelines were adopted by the ministerial meeting of the Bologna Process held in Bergen on 18-19 May 2005.*

Executive summary

This report has been drafted by the European Association for Quality Assurance in Higher Education (ENQA),[57] through its members, in consultation and co-operation with the EUA, ESIB and EURASHE and in discussion with various relevant networks. It forms the response to the twin mandates given to ENQA in the Berlin communiqué of September 2003 to develop "an agreed set of standards, procedures and guidelines on quality assurance" and "to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies".

The report consists of four chapters. After the introductory chapter on context, aims and principles, there follow chapters on standards and guidelines for quality assurance;[58] a peer review system for quality assurance agencies; and future perspectives and challenges.

The main results and recommendations of the report are:

−   there will be European standards for internal and external quality assurance, and for external quality assurance agencies;

−   European quality assurance agencies will be expected to submit themselves to a cyclical review within five years;

−   there will be an emphasis on subsidiarity, with reviews being undertaken nationally where possible;

−   a European register of quality assurance agencies will be produced;

−   a European Register Committee will act as a gatekeeper for the inclusion of agencies in the register;

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57. ENQA's General Assembly confirmed on 4 November 2004 the change of the former European Network into the European Association.
58. The term "quality assurance" in this report includes processes such as evaluation, accreditation and audit.

−   a European Consultative Forum for Quality Assurance in Higher Education will be established.

When the recommendations are implemented:

−   the consistency of quality assurance across the European Higher Education Area (EHEA) will be improved by the use of agreed standards and guidelines;

−   higher education institutions and quality assurance agencies across the EHEA will be able to use common reference points for quality assurance;

−   the register will make it easier to identify professional and credible agencies;

−   procedures for the recognition of qualifications will be strengthened;

−   the credibility of the work of quality assurance agencies will be enhanced;

−   the exchange of viewpoints and experiences amongst agencies and other key stakeholders (including higher education institutions, students and labour market representatives) will be enhanced through the work of the European Consultative Forum for Quality Assurance in Higher Education;

−   the mutual trust among institutions and agencies will grow;

−   the move toward mutual recognition will be assisted.

Summary list of European standards for quality assurance

This summary list of European standards for quality assurance in higher education is drawn from Chapter 2 of the report and is placed here for ease of reference. It omits the accompanying guidelines. The standards are in three parts covering internal quality assurance of higher education institutions, external quality assurance of higher education, and quality assurance of external quality assurance agencies.

Part 1: European standards and guidelines for internal quality assurance within higher education institutions

1.1. Policy and procedures for quality assurance

Institutions should have a policy and associated procedures for the assurance of the quality and standards of their programmes and awards. They should also commit themselves explicitly to the development of a culture which recognises the importance of quality, and quality assurance, in their work. To achieve this, institutions should develop and implement a strategy for the continuous enhancement of quality. The strategy, policy and procedures should have a formal status and be publicly available. They should also include a role for students and other stakeholders.

1.2. Approval, monitoring and periodic review of programmes and awards

Institutions should have formal mechanisms for the approval, periodic review and monitoring of their programmes and awards.

1.3. Assessment of students

Students should be assessed using published criteria, regulations and procedures which are applied consistently.

1.4. Quality assurance of teaching staff

Institutions should have ways of satisfying themselves that staff involved with the teaching of students are qualified and competent to do so. They should be available to those undertaking external reviews, and commented upon in reports.

1.5. Learning resources and student support

Institutions should ensure that the resources available for the support of student learning are adequate and appropriate for each programme offered.

1.6. Information systems

Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes of study and other activities.

1.7. Public information

Institutions should regularly publish up-to-date, impartial and objective information, both quantitative and qualitative, about the programmes and awards they are offering.

Part 2: European standards for the external quality assurance of higher education

2.1. Use of internal quality assurance procedures

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

2.2. Development of external quality assurance processes

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

2.3. Criteria for decisions

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

2.4. Processes fit for purpose

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

2.5. Reporting

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

2.6. Follow-up procedures

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

2.7. Periodic reviews

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

2.8. System-wide analyses

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Part 3: European standards for external quality assurance agencies

3.1. Use of external quality assurance procedures for higher education

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

3.2. Official status

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

3.3. Activities

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

3.4. Resources

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

3.5. Mission statement

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

3.6. Independence

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

3.7. External quality assurance criteria and processes used by the agencies

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

− a self-assessment or equivalent procedure by the subject of the quality assurance process;

− an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;

− publication of a report, including any decisions, recommendations or other formal outcomes;

− a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

3.8. Accountability procedures

Agencies should have in place procedures for their own accountability.

1. Context, aims and principles

In the Berlin communiqué of 19 September 2003 the Ministers of the Bologna Process signatory states invited ENQA "through its members, in co-operation with the EUA, EURASHE, and ESIB", to develop "an agreed set of standards, procedures and guidelines on quality assurance" and to "explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies, and to report back through the Bologna Follow-Up Group to Ministers in 2005". The Ministers also asked ENQA to take due account "of the expertise of other quality assurance associations and networks".

ENQA welcomed this opportunity to make a major contribution to the development of the European dimension in quality assurance and, thereby, to further the aims of the Bologna Process.

The work has involved many different organisations and interest groups. First, ENQA members have been extensively involved in the process. Members have participated in working groups, and draft reports have been important elements in the agenda of the ENQA General Assemblies in June and November 2004. Secondly, the European University Association (EUA), the European Association of Institutions in Higher Education (EURASHE), the National Unions of Students in Europe (ESIB) and the European Commission have participated through regular meetings in the "E4 Group". Thirdly, the contacts with and contributions from other networks, such as the European Consortium for Accreditation (ECA) and the Central and Eastern European Network of Quality Assurance Agencies (CEE Network), have been particularly valuable in the drafting process. Finally, ENQA and its partners have made good use of their individual international contacts and experiences and in this way ensured that relevant international perspectives were brought into the process.

Quality assurance in higher education is by no means only a European concern. All over the world there is an increasing interest in quality and standards, reflecting both the rapid growth of higher education and its cost to the public and the private purse. Accordingly, if Europe is to achieve its aspiration to be the most dynamic and knowledge-based economy in the world (Lisbon Strategy), then European higher education will need to demonstrate that it takes the quality of its programmes and awards seriously and is willing to put into place the means of assuring and demonstrating that quality. The initiatives and demands, which are springing up both inside and outside Europe in the face of this internationalisation of higher education, demand a response. The commitment of all those involved in the production of these proposals augurs well for the fulfilment of a truly European dimension to quality assurance with which to reinforce the attractiveness of the EHEA's higher education offering.

The proposals contained in this report are underpinned by a number of principles which are described in more detail in the two chapters which cover the two parts of the Berlin mandate. However, some fundamental principles should permeate the whole work:

- the interests of students as well as employers and the society more generally in good quality higher education;

- the central importance of institutional autonomy, tempered by a recognition that this brings with it heavy responsibilities;

- the need for external quality assurance to be fit for its purpose and to place only an appropriate and necessary burden on institutions for the achievement of its objectives.

The EHEA with its 40 states is characterised by its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations. This makes a single monolithic approach to quality, standards and quality assurance in higher education inappropriate. In the light of this diversity and variety, generally acknowledged as being one of the glories of Europe, the report sets its face against a narrow, prescriptive and highly formulated approach to standards. In both the standards and the guidelines, the report prefers the generic principle to the specific requirement. It does this because it believes that this approach is more likely to lead to broad acceptance in the first instance and because it will provide a more robust basis for the coming together of the different higher education communities across the EHEA. The generic standards ought to find a general resonance at the national[59] level of most signatory states. However, one consequence of the generic principle is that the standards and guidelines focus more on what should be done than how they should be achieved. Thus, the report does include procedural matters, but it has given a priority to standards and guidelines, especially in Chapter 2.

Finally, it must be emphasised that reaching agreement for this report is not the same thing as fulfilling the Bologna goal of a quality assurance dimension for the EHEA. Ahead lies more work to implement the recommendations of the report and secure the implied quality culture among both the higher education institutions and the external quality assurance agencies.

2. European standards and guidelines

The ministers' mandate to develop "an agreed set of standards, procedures and guidelines on quality assurance" raised a number of important questions. "Quality assurance" is a generic term in higher education which lends itself to many interpretations: It is not possible to use one definition to cover all circumstances. Similarly, the word "standards" is employed in a variety of ways across Europe, ranging from statements of narrowly defined regulatory requirements to more generalised descriptions of good practice. The words also have very different meanings in the local contexts of national higher education systems.

Moreover, the drafting process itself has made evident that, within the quality assurance community itself, there are some quite fundamental differences of view of the appropriate relationship that should be established between higher education institutions and their external evaluators. Some, mainly from agencies which accredit programmes or institutions, take the view that external quality assurance is essentially a matter of "consumer protection", requiring a clear distance to be established between the quality assurance agency and the higher education institutions whose work they assess, while other agencies see the principal purpose of external quality assurance to be the provision of advice and guidance in pursuit of improvements

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59. Throughout the report, the term "national" also includes the regional context with regard to quality assurance agencies, national contexts and authorities, etc.

in the standards and quality of programmes of study and associated qualifications. In the latter case a close relationship between the evaluators and the evaluated is a requirement. Yet others wish to adopt a position somewhere between the two, seeking to balance accountability and improvement.

Nor is it just the quality assurance agencies that have different views on these matters. The interests of the higher education institutions and student representative bodies are not always the same, the former seeking a high level of autonomy with a minimum of external regulation or evaluation (and that at the level of the whole institution), the latter wanting institutions to be publicly accountable through frequent inspection at the level of the programme or qualification.

Finally, the standards and guidelines relate only to the three cycles of higher education described in the Bologna Declaration and are not intended to cover the area of research or general institutional management.

Background of the standards and guidelines

This section of the report contains a set of proposed standards and guidelines for quality assurance in the EHEA. The standards and guidelines are designed to be applicable to all higher education institutions and quality assurance agencies in Europe, irrespective of their structure, function and size, and the national system in which they are located. As mentioned earlier, it has not been considered appropriate to include detailed "procedures" in the recommendations of this chapter of the report, since institutional and agency procedures are an important part of their autonomy. It will be for the institutions and agencies themselves, co-operating within their individual contexts, to decide the procedural consequences of adopting the standards contained in this report.

As their starting point, the standards and guidelines endorse the spirit of the "July 2003 Graz Declaration" of the European University Association (EUA) which states that "the purpose of a European dimension to quality assurance is to promote mutual trust and improve transparency while respecting the diversity of national contexts and subject areas". Consonant with the Graz declaration, the standards and guidelines contained in this report recognise the primacy of national systems of higher education, the importance of institutional and agency autonomy within those national systems, and the particular requirements of different academic subjects. In addition, the standards and guidelines owe much to the experience gained during the ENQA-coordinated pilot project "Transnational European Evaluation Project" (TEEP), which investigated, in three disciplines, the operational implications of a European transnational quality evaluation process.

The standards and guidelines also take into account the quality convergence study published by ENQA in March 2005, which examined the reasons for differences between different national approaches to external quality assurance and constraints on their convergence. Further, they reflect the statement of ministers in the Berlin communiqué that "consistent with the principle of institutional autonomy, the

primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework". In these standards and guidelines, therefore, an appropriate balance has been sought between the creation and development of internal quality cultures, and the role which external quality assurance procedures may play.

In addition, the standards and guidelines have also benefited particularly from the "Code of Good Practice" published in December 2004 by the European Consortium for Accreditation (ECA) and other perspectives included in ESIB's "Statement on agreed set of standards, procedures and guidelines at a European level" (April 2004) and "Statement on peer review of quality assurance and accreditation agencies" (April 2004), EUA's "QA policy position in the context of the Berlin Communiqué" (April 2004) and the EURASHE "Policy Statement on the Bologna Process" (June 2004). Finally, an international perspective has been included by comparing the standards on external quality assurance with the "Guidelines for good practice" being implemented by the international network INQAAHE.

Introduction to Parts 1 and 2: European standards and guidelines for internal and external quality assurance of higher education

The standards and guidelines for internal and external quality assurance, which follow, have been developed for the use of higher education institutions and quality assurance agencies working in the EHEA, covering key areas relating to quality and standards.

The purpose of these standards and guidelines is to provide a source of assistance and guidance to both higher education institutions in developing their own quality assurance systems and agencies undertaking external quality assurance, as well as to contribute to a common frame of reference, which can be used by institutions and agencies alike. It is not the intention that these standards and guidelines should dictate practice or be interpreted as prescriptive or unchangeable.

In some countries of the EHEA the ministry of education or an equivalent organisation has the responsibility for some of the areas covered by the standards and guidelines. Where this is the case, that ministry or organisation should ensure that appropriate quality assurance mechanisms are in place and subject to independent reviews.

Basic principles

The standards and guidelines are based on a number of basic principles about quality assurance, both internal in and external to higher education in the EHEA. These include:

− providers of higher education have the primary responsibility for the quality of their provision and its assurance;

− the interests of society in the quality and standards of higher education need to be safeguarded;

− the quality of academic programmes need to be developed and improved for students and other beneficiaries of higher education across the EHEA;

− there need to be efficient and effective organisational structures within which those academic programmes can be provided and supported;

− transparency and the use of external expertise in quality assurance processes are important;

− there should be encouragement of a culture of quality within higher education institutions;

− processes should be developed through which higher education institutions can demonstrate their accountability, including accountability for the investment of public and private money;

− quality assurance for accountability purposes is fully compatible with quality assurance for enhancement purposes;

− institutions should be able to demonstrate their quality at home and internationally;

− processes used should not stifle diversity and innovation.

Purposes of the standards and guidelines

The purposes of the standards and guidelines are:

− to improve the education available to students in higher education institutions in the EHEA;

− to assist higher education institutions in managing and enhancing their quality and, thereby, to help to justify their institutional autonomy;

− to form a background for quality assurance agencies in their work;

− to make external quality assurance more transparent and simpler to understand for everybody involved.

Objectives of the standards and guidelines

The objectives of the standards and guidelines are:

− to encourage the development of higher education institutions which foster vibrant intellectual and educational achievement;

− to provide a source of assistance and guidance to higher education institutions and other relevant agencies in developing their own culture of quality assurance;

− to inform and raise the expectations of higher education institutions, students, employers and other stakeholders about the processes and outcomes of higher education;

–   to contribute to a common frame of reference for the provision of higher education and the assurance of quality within the EHEA.

External quality assurance

The standards and guidelines proposed in this report envisage an important role for external quality assurance. The form of this varies from system to system and can include institutional evaluations of different types; subject or programme evaluations; accreditation at subject, programme and institutional levels; and combinations of these. Such external evaluations largely depend for their full effectiveness on there being an explicit internal quality assurance strategy, with specific objectives, and on the use, within institutions, of mechanisms and methods aimed at achieving those objectives.

Quality assurance can be undertaken by external agencies for a number of purposes, including:

–   safeguarding of national academic standards for higher education;

–   accreditation of programmes and/or institutions;

–   user protection;

–   public provision of independently verified information (quantitative and qualitative) about programmes or institutions;

–   improvement and enhancement of quality.

The activities of European quality assurance agencies will reflect the legal, social and cultural requirements of the jurisdictions and environments in which they operate. European standards relating to the quality assurance of quality assurance agencies themselves are contained in Part 3 of this chapter.

The processes carried out by quality assurance agencies will properly depend upon their purposes and the outcomes they are intended to achieve. The procedures adopted by those agencies that are concerned to emphasise principally the enhancement of quality may be quite different from those whose function is first to provide strong "consumer protection". The standards that follow reflect basic good practice across Europe in external quality assurance, but do not attempt to provide detailed guidance about what should be examined or how quality assurance activities should be conducted. Those are matters of national autonomy, although the exchange of information amongst agencies and authorities is already leading to the emergence of convergent elements.

There are, however, already some general principles of good practice in external quality assurance processes:

–   institutional autonomy should be respected;

–   the interests of students and other stakeholders such as labour market representatives should be at the forefront of external quality assurance processes;

−   use should be made, wherever possible, of the results of institutions' own internal quality assurance activities.

The "guidelines" provide additional information about good practice and in some cases explain in more detail the meaning and importance of the standards. Although the guidelines are not part of the standards themselves, the standards should be considered in conjunction with them.

Part 1: European standards and guidelines for internal quality assurance within higher education institutions

1.1. Policy and procedures for quality assurance

Standard

Institutions should have a policy and associated procedures for the assurance of the quality and standards of their programmes and awards. They should also commit themselves explicitly to the development of a culture which recognises the importance of quality, and quality assurance, in their work. To achieve this, institutions should develop and implement a strategy for the continuous enhancement of quality.

The strategy, policy and procedures should have a formal status and be publicly available. They should also include a role for students and other stakeholders.

Guidelines

Formal policies and procedures provide a framework within which higher education institutions can develop and monitor the effectiveness of their quality assurance systems. They also help to provide public confidence in institutional autonomy. Policies contain the statements of intentions and the principal means by which these will be achieved. Procedural guidance can give more detailed information about the ways in which the policy is implemented and provides a useful reference point for those who need to know about the practical aspects of carrying out the procedures.

The policy statement is expected to include:

−   the relationship between teaching and research in the institution;
−   the institution's strategy for quality and standards;
−   the organisation of the quality assurance system;
−   the responsibilities of departments, schools, faculties and other organisational units and individuals for the assurance of quality;
−   the involvement of students in quality assurance;
−   the ways in which the policy is implemented, monitored and revised.

The realisation of the EHEA depends crucially on a commitment at all levels of an institution to ensuring that its programmes have clear and explicit intended outcomes; that its staff are ready, willing and able to provide teaching and learner support that will help its students achieve those outcomes; and that there is full,

timely and tangible recognition of the contribution to its work by those of its staff who demonstrate particular excellence, expertise and dedication. All higher education institutions should aspire to improve and enhance the education they offer their students.

1.2. Approval, monitoring and periodic review of programmes and awards

Standard

Institutions should have formal mechanisms for the approval, periodic review and monitoring of their programmes and awards.

Guidelines

The confidence of students and other stakeholders in higher education is more likely to be established and maintained through effective quality assurance activities which ensure that programmes are well-designed, regularly monitored and periodically reviewed, thereby securing their continuing relevance and currency.

The quality assurance of programmes and awards are expected to include:

- development and publication of explicit intended learning outcomes;
- careful attention to curriculum and programme design and content;
- specific needs of different modes of delivery (e.g. full-time, part-time, distance learning, e-learning) and types of higher education (e.g. academic, vocational, professional);
- availability of appropriate learning resources;
- formal programme approval procedures by a body other than that teaching the programme;
- monitoring of the progress and achievements of students;
- regular periodic reviews of programmes (including external panel members);
- regular feedback from employers, labour market representatives and other relevant organisations;
- participation of students in quality assurance activities.

1.3. Assessment of students

Standard

Students should be assessed using published criteria, regulations and procedures which are applied consistently.

Guidelines

The assessment of students is one of the most important elements of higher education. The outcomes of assessment have a profound effect on students' future careers.

It is therefore important that assessment is carried out professionally at all times and that it takes into account the extensive knowledge which exists about testing and examination processes. Assessment also provides valuable information for institutions about the effectiveness of teaching and learners' support.

Student assessment procedures are expected to:

−   be designed to measure the achievement of the intended learning outcomes and other programme objectives;

−   be appropriate for their purpose, whether diagnostic, formative or summative;

−   have clear and published criteria for marking;

−   be undertaken by people who understand the role of assessment in the progression of students towards the achievement of the knowledge and skills associated with their intended qualification;

−   where possible, not rely on the judgements of single examiners;

−   take account of all the possible consequences of examination regulations;

−   have clear regulations covering student absence, illness and other mitigating circumstances;

−   ensure that assessments are conducted securely in accordance with the institution's stated procedures;

−   be subject to administrative verification checks to ensure the accuracy of the procedures.

In addition, students should be clearly informed about the assessment strategy being used for their programme, what examinations or other assessment methods they will be subject to, what will be expected of them, and the criteria that will be applied to the assessment of their performance.

1.4. Quality assurance of teaching staff

Standard

Institutions should have ways of satisfying themselves that staff involved with the teaching of students are qualified and competent to do so. They should be available to those undertaking external reviews, and commented upon in reports.

Guidelines

Teachers are the single most important learning resource available to most students. It is important that those who teach have a full knowledge and understanding of the subject they are teaching, have the necessary skills and experience to transmit their knowledge and understanding effectively to students in a range of teaching contexts, and can access feedback on their own performance. Institutions should ensure that their staff recruitment and appointment procedures include a means of making certain that all new staff have at least the minimum necessary level of competence. Teaching staff should be given opportunities to develop and extend

their teaching capacity and should be encouraged to value their skills. Institutions should provide poor teachers with opportunities to improve their skills to an acceptable level and should have the means to remove them from their teaching duties if they continue to be demonstrably ineffective.

1.5. Learning resources and student support

Standard

Institutions should ensure that the resources available for the support of student learning are adequate and appropriate for each programme offered.

Guidelines

In addition to their teachers, students rely on a range of resources to assist their learning. These vary from physical resources such as libraries or computing facilities to human support in the form of tutors, counsellors, and other advisers. Learning resources and other support mechanisms should be readily accessible to students, designed with their needs in mind and responsive to feedback from those who use the services provided. Institutions should routinely monitor, review and improve the effectiveness of the support services available to their students.

1.6. Information systems

Standard

Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes of study and other activities.

Guidelines

Institutional self-knowledge is the starting point for effective quality assurance. It is important that institutions have the means of collecting and analysing information about their own activities. Without this they will not know what is working well and what needs attention, or the results of innovatory practices.

The quality-related information systems required by individual institutions will depend to some extent on local circumstances, but are at least expected to cover:

- student progression and success rates;
- employability of graduates;
- students' satisfaction with their programmes;
- effectiveness of teachers;
- profile of the student population;
- learning resources available and their costs;
- the institution's own key performance indicators.

There is also value in institutions comparing themselves with other similar organisations within the EHEA and beyond. This allows them to extend the range of their self-knowledge and to access possible ways of improving their own performance.

1.7. Public information

Standard

Institutions should regularly publish up-to-date, impartial and objective information, both quantitative and qualitative, about the programmes and awards they are offering.

Guidelines

In fulfilment of their public role, higher education institutions have a responsibility to provide information about the programmes they are offering, the intended learning outcomes of these, the qualifications they award, the teaching, learning and assessment procedures used, and the learning opportunities available to their students. Published information might also include the views and employment destinations of past students and the profile of the current student population. This information should be accurate, impartial, objective and readily accessible and should not be used simply as a marketing opportunity. The institution should verify that it meets its own expectations in respect of impartiality and objectivity.

Part 2: European standards and guidelines for the external quality assurance of higher education

2.1. Use of internal quality assurance procedures

Standard

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guidelines

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

2.2. Development of external quality assurance processes

Standard

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Guidelines

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

2.3. Criteria for decisions

Standard

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Guidelines

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner.

Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

2.4. Processes fit for purpose

Standard

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Guidelines

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

2.5. Reporting

Standard

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Guidelines

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

2.6. Follow-up procedures

Standard

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Guidelines

Quality assurance is not principally about individual external scrutiny events. It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

2.7. Periodic reviews

Standard

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Guidelines

Quality assurance is not a static but a dynamic process. It should be continuous and not "once in a lifetime". It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

2.8. System-wide analyses

Standard

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Guidelines

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

Introduction to Part 3: European standards and guidelines for external quality assurance agencies

The growth of European external quality assurance agencies has been expansive since the early 1990s. At the same time co-operation and sharing of best practices among agencies have been an integrated element in this development. Already in 1994/95 the so-called European Pilot Projects initiated by the European Commission resulted in the mutual recognition by agencies of the basic methodology of quality assurance: independent agencies, self-evaluations, external site visits and public reporting, laid down in the 1998 EU Council Recommendation on quality assurance in higher education. The creation of ENQA in 2000 was therefore a natural formalisation of this development in co-operation, and ENQA has been able to build on the state-of-the-art consensus arrived at during the 1990s.

The European standards for external quality assurance agencies, which follow, have been developed on the premises of this development in the young history of European external quality assurance. Moreover it is the conscious ambition that the standards should be neither too detailed nor too prescriptive. They must not reduce the freedom of European quality assurance agencies to reflect in their organisations and processes the experiences and expectations of their nation or region. The standards must, though, ensure that the professionalism, credibility and integrity of the agencies are visible and transparent to their stakeholders and must permit comparability to be observable among the agencies and allow the necessary European dimension.

It should be added that in this way the standards do also contribute naturally to the work being done towards mutual recognition of agencies and the results of agency evaluations or accreditations. This work has been explored in the Nordic Quality Assurance Network in Higher Education (NOQA) and is part of the "Code of Good Practice" by the European Consortium for Accreditation (ECA).

Several "guidelines" have been added to provide additional information about good practice and in some cases explain in more detail the meaning and importance of the standards. Although the guidelines are not part of the standards themselves, the standards should be considered in conjunction with them.

Part 3: European standards and guidelines for external quality assurance agencies

3.1. Use of external quality assurance procedures for higher education

Standard

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

Guidelines

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions.

The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

3.2. Official status

Standard

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

3.3. Activities

Standard

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Guidelines

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

3.4. Resources

Standard

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

3.5. Mission statement

Standard

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Guidelines

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

3.6. Independence

Standard

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines

An agency will need to demonstrate its independence through measures, such as:

−   its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);

−   the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;

- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

3.7. External quality assurance criteria and processes used by the agencies

Standard

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Guidelines

Agencies may develop and use other processes and procedures for particular purposes.

Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

3.8. Accountability procedures

Standard

Agencies should have in place procedures for their own accountability.

Guidelines

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;

2. Documentation which demonstrates that:

- the agency's processes and results reflect its mission and goals of quality assurance;

− the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;

− the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;

− the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

3. A mandatory cyclical external review of the agency's activities at least once every five years.

3. Peer review system for quality assurance agencies

In Berlin the Ministers called "upon ENQA, through its members, in co-operation with the EUA, EURASHE, and ESIB, to … explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies".

ENQA and its partners have met this call by building on the interpretation of the mandate that a system of peer review of agencies must include not only the peer review process itself, but also a careful consideration of the quality standards on which a review could be built. Further, there has been agreement in the process that peer review of agencies should be interpreted as basically the means to achieve the goal of transparency, visibility and comparability of quality of agencies.

Therefore, this report has as a major proposal the creation of a register of recognised external quality assurance agencies operating in higher education within Europe. This proposal is in essence a response to expectations that there is likely soon to be an increase of quality assurance bodies keen to make a profit from the value of a recognition or accreditation label. Experience elsewhere has shown that it is difficult to control such enterprises, but Europe has a possibly unique opportunity to exercise practical management of this new market, not in order to protect the interests of already established agencies, but to make sure that the benefits of quality assurance are not diminished by the activities of disreputable practitioners.

The work on these proposals has principally taken into consideration the European context and demands. At the same time there has been awareness in the process that similar experiences and processes are developing internationally. This chapter therefore opens with a brief analysis of the international experiences and initiatives relevant for the drafting of this part of the report. It then outlines the proposed peer review system based on the subsidiarity principle and the European standards for external quality assurance agencies. This outline leads to a presentation of the

recommended register of external quality assurance agencies operating in Europe. The peer reviews and the agencies' compliance with the European standards play a crucial role in the composition of the register. Finally, a European Consultative Forum for Quality Assurance in Higher Education is proposed.

International context

Europe is not the only area where dynamic developments in the field of higher education quality assurance are currently taking place. This section describes some of the experiences and initiatives of organisations such as the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), the International Association of University Presidents (IAUP), the Council for Higher Education Accreditation in the United States (CHEA), OECD and UNESCO. The work of these organisations in relation to quality assurance have been found useful during the drafting of this report. Even though these international experiences have not been directly included in the specific recommendations, some key international elements are presented below in a manner that relates to the recommendations in this chapter.

The identification of good quality and good practices of external quality assurance agencies has also been on the international agenda for several years. INQAAHE discussed in 1999 and onwards a quality label for external quality assurance agencies, an idea originally initiated by the IAUP, in order to meet the need for higher education institutions to identify which agencies are qualified to fulfil the external quality assurance role. The quality label met widespread opposition and instead INQAAHE has focused on formulating good practice criteria for agencies. The result is a set of principles that presents common denominators of good practice while at the same time recognising the international diversity of agencies in terms of purposes and historical cultural contexts.

In terms of the recommendations on peer review of agencies, the work done by CHEA is relevant. CHEA is a non-governmental organisation functioning as an umbrella body for the US regional, specialised, national and professional accreditation agencies. Accrediting organisations that seek recognition by CHEA must demonstrate that they meet CHEA recognition standards. Accrediting organisations will be expected to advance academic quality, demonstrate accountability, encourage improvement, employ appropriate procedures, continually reassess accreditation practices and possess sufficient resources. CHEA will demand that members undergo so-called recognition reviews every six years. There are basic similarities and compatibility between the CHEA approach and the proposals of this report, for instance in terms of cyclical reviews. However, this report has given a priority to a distinct focus on the quality assurance of agencies.

A separate initiative has been taken jointly by OECD and UNESCO to elaborate guidelines for quality provision in cross-border higher education. The OECD-UNESCO guidelines will be finalised in 2005, but the drafting process has identified

the contrast between the need to regulate the internationalisation of higher education and the fact that existing national quality assurance capacity often focuses exclusively on domestic delivery by domestic institutions. Therefore, it is posed as a challenge for the current quality assurance systems to develop appropriate methodologies and mechanisms to cover foreign providers and programmes in addition to national providers and programmes in order to maximise the benefits and limit the potential disadvantages of the internationalisation of higher education.

The proposed OECD-UNESCO guidelines recommend that external quality assurance agencies ensure that their quality assurance arrangements include foreign and for-profit institutions/providers as well as distance education delivery and other non-traditional modes of educational delivery. However, the drafting process of the guidelines also recognises that the inclusion of foreign providers in the remit of national agencies will in most cases require changes in national legislation and administrative procedures.

This report recognises the importance and implications of internationalisation for the quality assurance of higher education institutions. Although it has been considered too early to include a reference to this in the proposed European standards for external quality assurance, the proposal for a European register does explicitly include agencies from outside Europe operating here as well as European agencies with cross-border operations.

It should also be recognised that the continuing European process fully meets the OECD-UNESCO recommendation that agencies should sustain and strengthen the existing regional and international networks.

Cyclical reviews of agencies

The field of external quality assurance of higher education in Europe is relatively young. However, it may be considered an element of growing maturity among agencies that recent years have evidenced an interest in enhancing credibility of agency work by focusing on internal and external quality assurance of agencies themselves. An ENQA workshop in February 2003 in Sitges, Spain, had quality assurance of agencies as its theme. The participants discussed existing experiences of external evaluation of agencies and one conclusion of the workshop was a recommendation that ENQA should work towards making cyclical external reviews of member agencies. Accordingly, ENQA received the Berlin mandate at a time when discussion of external reviews of agencies had already begun in ENQA and been an element in E4 meetings.

This report recommends that any European agency should at no more than five-year intervals conduct or be submitted to a cyclical external review of its processes and activities. The results should be documented in a report which states the extent to which the agency is in compliance with the European standards for external quality assurance agencies (see Chapter 2, Part 3).

In the EHEA the map of providers and operators in external quality assurance of higher education will no doubt be more complicated in the future. Therefore, it is important that non-ENQA members are included in considerations on quality assurance of agencies. And it is even more important that agencies from outside Europe have an open opportunity, if they want it, to measure themselves against the recommended European standards. Therefore, the report does not wish to confine the focus of this recommendation to nationally recognised European agencies and thus by implication only actual or potential ENQA members. On the contrary, agencies from outside Europe, but operating in Europe, or European agencies that are not nationally recognised, must also be allowed to opt for a review that assesses their compliance with the European standards.

The general principles for cyclical reviews are proposed to be as follows:

−   External quality assurance agencies established and officially recognised as national agencies by a Bologna signatory state should normally be reviewed on a national basis, thus respecting the subsidiarity principle – even if they also operate beyond national borders. These European national agencies may on the other hand also opt for reviews organised by ENQA rather than internal nationally based reviews. The reviews of agencies should include an assessment of whether the agencies are in compliance with the European standards for external quality assurance agencies.

−   Agencies not established and officially recognised in a Bologna signatory state may on their own initiative opt to be reviewed against the European standards for external quality assurance agencies.

−   The reviews should follow the process comprising a self-evaluation, an independent panel of experts and a published report.

An external review will typically be initiated at the national or agency level. It is therefore expected that reviews of agencies will usually follow from national regulations or from the internal quality assurance processes in place in the agency. This report wishes strongly to emphasise the importance of respecting the subsidiarity principle, and it is therefore proposed that ENQA, in respect of its own members, takes the initiative toward an agency only in the case where after five years no initiative has been taken nationally or by the agency itself. Where the agency is a non-ENQA member and after five years no initiative has been taken nationally or by the agency itself, the European Register Committee is responsible for initiating the review.

When national authorities initiate reviews, the purpose could obviously be quite broad and include the agency's fulfilment of the national mandate, for example. However, it is a core element in this proposal that reviews – regardless of whether they are initiated at a national, agency or ENQA level – must always explicitly consider the extent to which the agency conforms with the European standards for external quality assurance agencies. The ENQA General Assembly decided at its meeting in November 2004 that the membership criteria of ENQA should conform

with the proposed European standards for external quality assurance agencies. Accordingly, the review of an agency will not only make evident the level of conformity with the European standards, but also at the same time indicate the level of compliance with ENQA membership criteria.

Finally, the report stresses that the involvement of international experts with appropriate expertise and experience will provide substantial benefit to the review process.

The follow-up of a cyclical review will first and foremost be the responsibility of the national authorities or owners of the agency and, of course, of the agency itself. ENQA will have a role in the follow-up only in the case of member agencies where ENQA must certify the degree to which the member agency meets the European standards for external quality assurance agencies according to the review. ENQA regulations will specify the consequences if this is not the case.

An illustrative outline of an exemplary process of an external review of an agency is shown in the annex to this report.

Proposed register structure		**Reviewed**		**Not reviewed**
		Compliance with European standards	**Non-compliance with European standards**	
European national agencies	National operators			
	Cross-border operators			
European non-national agencies				
Extra-European agencies operating in Europe				

Register of external quality assurance agencies operating in Europe

ENQA committed itself before the Berlin Ministerial meeting of 2003 to develop in co-operation with the relevant stakeholders a European register of quality assurance agencies, covering public, private, and thematic agencies, operating or planning to operate in Europe.

The register would meet the interest of higher education institutions and governments in being able to identify professional and credible quality assurance agencies operating in Europe. This interest has firstly its basis in the complicated area of recognition of non-national degrees. Recognition procedures would be strengthened if it were transparent to what extent providers were themselves quality assured by

recognised agencies. Secondly, it is increasingly possible for higher education institutions to seek quality assurance from agencies across national borders. Higher education institutions would of course be helped in this process by being able to identify professional agencies from a reliable register.

The most valuable asset of the register would thus be its informative value to institutions and other stakeholders, and the register could in itself become a very useful instrument for achieving transparency and comparability of external quality assurance of higher education institutions.

The register must make evident the level of compliance of entrants with the European standards for external quality assurance agencies. However, it is important to stress that this report does not aim at proposing the register as a ranking instrument.

The register should be open for applications from all agencies providing services within Europe, including those operating from countries outside Europe or those with a transnational or international basis. The agencies will be placed into different sections of the register depending on whether they are peer reviewed or not, whether they comply with the European standards for external quality assurance agencies or not, and whether they operate strictly nationally or across borders.

A possible structure for the register is therefore:

Section 1. Peer reviewed agencies, divided into the following categories:

−   European national agencies that have been reviewed and fulfil all the European standards for external quality assurance agencies;

−   European national agencies that have been reviewed, but do not fulfil all the European standards for external quality assurance agencies;

−   non-national and extra-European agencies that operate in Europe, have been reviewed and fulfil all the European standards for external quality assurance agencies;

−   non-national and extra-European agencies that operate in Europe and have been reviewed, but do not fulfil all the European standards for external quality assurance agencies.

Section 2. Non-reviewed agencies

−   European national agencies, non-national agencies and extra-European agencies that have not been reviewed and are therefore listed according to information gained from their application for inclusion in the register.

Presented in a grid, the structure of the register is this:

A European Register Committee will decide on admissions to the European register. The committee will use agency compliance with the European standards for external quality assurance agencies as identified in the cyclical review as one criterion for placement in the register. Other criteria should be developed which will take account of the diversity of the higher education systems.

The committee will be a light, non-bureaucratic construction with nine members nominated by EURASHE, ESIB, EUA, ENQA and organisations representing European employers, unions and professional organisations plus government representatives. These members will act in an individual capacity and not as mandated representatives of the nominating organisations. ENQA will perform the secretarial duties for the committee which will meet at least on a semi-annual basis.

The European Register Committee will as one of its first implementation tasks formalise the ownership of the register.

Another immediate task for the European Register Committee must be to establish an independent and credible appeals system to secure the rights of those that have been refused or that cannot accept their placement in the register. This appeals system should be an element in the protocol to be drafted by the committee soon after it has become operational.

European Consultative Forum for Quality Assurance in Higher Education

Since the Prague meeting in 2001 the E4 group, consisting of ENQA, EUA, ESIB and EURASHE, has met on a regular basis to discuss respective views on the Bologna Process and European quality in higher education. Since the Berlin meeting in 2003 the E4 meetings have had as their major focus the implementation of the mandate of the Ministers on quality assurance in higher education.

This co-operation at the European level has proved constructive. The four organisations have therefore agreed that a European Consultative Forum for Quality Assurance in Higher Education will continue to exist building from the E4 group. The foundation of such a forum would in practical terms establish the current co-operation between ENQA, EUA, EURASHE and ESIB on a more permanent basis. The forum would function primarily as a consultative and advisory forum for the major European stakeholders and it would resemble the current arrangements where the four respective organisations finance their own expenses and participation without the creation of a new administrative structure. In the longer term the forum should also include labour-market representatives.

4. Future perspectives and challenges

This report contains proposals and recommendations that have been developed and endorsed by the key European players in the world of quality assurance in higher education. The very existence of the report is a testimony to the achievement of a joint understanding in a field where such an understanding might be thought inherently unlikely, given the different interests in play. The proposals offer increased transparency, security and information about higher education for students and society more generally. They equally offer higher education institutions recognition and credibility and opportunities to demonstrate their dedication to high quality in an increasingly competitive and sceptical environment. For the quality assurance

agencies the proposals enhance their own quality and credibility and connect them more productively to their wider European professional fraternity.

The proposals will remain no more than proposals, however, if they are not accompanied by an effective implementation strategy. If approved by the ministers in Bergen, immediate steps will be taken to begin to introduce some of the key elements of this report. The register of quality assurance agencies should be envisaged as being started during the latter half of 2005 and to be ready to go on-line in 2006. The ENQA secretariat has made provision for the extra resources that will be necessary for this purpose. Following the ministerial meeting, ENQA will take the necessary concrete initiatives towards establishing the European Register Committee. The committee will begin its work with formalising the ownership of the register and drafting a protocol based on the preliminary work done by ENQA in the spring of 2005. The first of the cyclical reviews should be expected to take place during 2005.

The European Consultative Forum for Quality Assurance in Higher Education will also be an early initiative. Thus, the outcomes of the Bergen ministerial meeting, and the establishment of the forum will be the main theme of the next meeting between ENQA and its E4 partners in June 2005. In addition, the future co-operation with other key stakeholders such as labour-market representatives will be subject to discussions. ENQA has also arranged a meeting with the other European quality assurance networks prior to the next ENQA General Assembly in September 2005.

The possibility of rapid implementation of certain of the proposals of this report should not be taken to mean that the task of embedding the rest of them will be easy. It will take longer for the internal and external quality assurance standards to be widely adopted by institutions and agencies, because their acceptance will depend on a willingness to change and develop on the part of signatory states with long-established and powerful higher education systems. What is proposed in the internal quality assurance standards will be challenging for some higher education institutions, especially where there is a new and developing tradition of quality assurance or where the focus on students' needs and their preparation to enter the employment market is not embedded in the institutional culture. Similarly, the standards for external quality assurance and for quality assurance agencies themselves will require all participants, and especially the agencies, to look very carefully at themselves and to measure their practices against the European expectation. The new cyclical review procedure will provide a timely focus for this purpose. It will only be when the benefits of adoption of the standards are seen that there is likely to be general acceptance of them.

The EHEA operates on the basis of individual national responsibility for higher education and this implies autonomy in matters of external quality assurance. Because of this the report is not and cannot be regulatory but makes its recommendations and proposals in a spirit of mutual respect among professionals; experts drawn from higher education institutions including students; ministries; and quality

assurance agencies. Some signatory states may want to enshrine the standards and review process in their legislative or administrative frameworks. Others may wish to take a longer view of the appropriateness of doing so, weighing the advantages of change against the strengths of the status quo. The proposed European Consultative Forum for Quality Assurance in Higher Education should prove a useful place in which to discuss, debate and learn about new thinking, the experiences of other systems and the similarities and dissimilarities of national experiences.

All in all, there will be a considerable and challenging workload for ENQA, its E4 partners and other key stakeholders to get to grips with in the coming years. The report therefore makes it clear that completion of this report is not the same thing as fulfilling the Bologna goal of a quality assurance dimension for the EHEA. Ahead lies more work to implement the recommendations of the report and secure the implied quality culture among both the higher education institutions and the external quality assurance agencies. What has been set in motion by the Berlin mandate will need continuing maintenance and coaxing if it is to provide the fully functioning European dimension of quality assurance for the EHEA.

A European higher education area with strong, autonomous and effective higher education institutions, a keen sense of the importance of quality and standards, good peer reviews, credible quality assurance agencies, an effective register and increased co-operation with other stakeholders, such as employers, is now possible and the proposals contained in this report will go a long way towards making that vision a reality.

Annex: Cyclical review of quality assurance agencies[60] – a theoretical model

The model presented below is a proposed indicative outline for a process of external review of an external quality assurance agency. It is presented as an example of a credible process suited to identify compliance with the European standards for external quality assurance agencies. However, note must be taken that the purpose is instructive and illustrative. Therefore, the level of detail is high and most likely higher than what will be perceived as needed in individual peer reviews of agencies. It follows from this that in no way must the process presented here be considered as a standard in itself. Further, it should be noted that in the presented example the term "evaluation" is applied to cover objectives and processes. Terms, such as "accreditation" or "audit", might as well be applied.

The process covers the following elements:

− formulating terms of reference and protocol for the review;

− nomination and appointment of panel of experts;

− self-evaluation by the agency;

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60. The structure of the annex approximates the one documented recently in a manual of a project on mutual recognition of quality assurance agencies in the Nordic countries.

−   site visit;

−   reporting.

1. Terms of reference

The terms of reference must identify the goals of the review in terms of the perspectives and interests of authorities, stakeholders and the agency itself. All the main tasks and operations of the agency must be covered and in such a manner that it is evident that no hidden agendas are present.

2. Self-evaluation

2.1. Background information required from agency as basis of review

Relevant background information is necessary to understand the context in which the agency is working. The section is expected to include:

2.1.1. A brief outline of the national higher education system, including:

−   degree structure;

−   institutional structure;

−   procedures and involved parties in establishing new subjects, programmes and institutions;

−   other quality assurance procedures;

−   status of higher education institutions in relation to the government.

2.1.2. A brief account of the history of the particular agency and of the evaluation of higher education in general:

−   mission statement;

−   establishment of the agency (government, higher education institutions, others);

−   description of the legal framework and other formal regulations concerning the agency (e.g. parliamentary laws, ministerial orders or decrees);

−   the financing of the agency;

−   placement of the right to initiate evaluations;

−   internal organisation of the agency, including procedures for appointment and composition of board/council;

−   other responsibilities of the agency than the evaluation of higher education;

−   international activities of the agency, including formal agreements as well as other activities, e.g. participation in conferences, working groups and staff exchange;

−   role of the agency in follow-up on evaluations: consequences and sanctions.

2.2. External quality assurance undertaken by the agency

Evidence should be produced indicating that the agency undertakes on a regular basis external quality assurance of higher education institutions or programmes. This quality assurance should involve either evaluation, accreditation, review, audit or assessment, and these are part of the core functions of the agency.

By "regular" it is understood that evaluations are planned on the basis of a systematic procedure and that several quality assessments have been conducted over the last two years. This evidence should include:

− a description of the methodological scope of the agency;
− an account of the number of quality assessments conducted and the number of units evaluated.

2.3. Evaluation method applied by the agency

2.3.1. Background information

An account of the overall planning of an evaluation and other fundamental issues is needed to be able to determine if the agency is working on the basis of transparent methodological procedures.

This account should include:

− the procedures for briefing of and communication with the evaluated institutions;
− the agency strategy for student participation;
− the procedures related to establishing the terms of reference/project plan of the individual assessment;
− the reference(s) for evaluation (predefined criteria, legal documents, subject benchmarks, professional standards, the stated goals of the evaluated institution);
− the extent to which the methodological elements are modified to specific reviews.

2.3.2. Elements of methodology

An account giving evidence that the methodology the agency is working on is predefined and public and that review results are public.

The methodology includes:

− self-evaluation or equivalent procedure of the given object of evaluation;
− external evaluation by a group of experts and site visits as decided by the agency;
− publication of a report with public results.

The agency can also work out and apply other methodologies fit for special purposes.

The agency's decisions and reports are consistent in terms of principles and requirements, even if different groups form the judgements.

If the agency makes evaluation decisions, there is an appeals system. This methodology is applied to the needs of the agencies.

If the agency is to make recommendations and/or conditional resolutions, it has a follow-up procedure to check on the results.

2.3.3. An account of the role of the external expert group

The account on the role of the external expert group should include:

−   procedures for nomination and appointment of experts, including criteria for the use of international experts, and representatives of stakeholders such as employers and students;
−   methods of briefing and training of experts;
−   meetings between experts: number, scope and time schedule in relation to the overall evaluation process;
−   division of labour between agency and experts;
−   role of the agency's staff in the evaluations;
−   identification and appointment of the member(s) of staff at the agency to be responsible for the evaluation.

2.3.4. Documentation

Several accounts of the agency's procedures for collecting documentation are needed to determine the procedures related to the self-evaluation of the agency and site visits:

2.3.4.1. An account of the procedures related to self-evaluation

This account should include:

−   specification of content in the guidelines provided by the agency;
−   procedural advice provided by the agency;
−   requirements for composition of self-evaluation teams, including the role of students;
−   training/information of self-evaluation teams;
−   time available for conducting the self-evaluation.

2.3.4.2. An account of the procedures related to the site visit

This account should include:

−   questionnaires/interviewing protocols;

- principles for selection of participants/informants (categories and specific participants);
- principles for the length of the visit;
- number of meetings and average length;
- documentation of the meetings (internal/external, minutes, transcriptions, etc.);
- working methods of the external expert group.

2.3.4.3. The reports

The documentation should include the following information on the reports:

- purpose of the report;
- drafting of the report (agency staff or experts);
- format of report (design and length);
- content of report (documentation or only analysis/recommendations);
- principles for feedback from the evaluated parties on the draft report;
- publication procedures and policy (e.g. handling of the media);
- immediate follow-up (e.g. seminars and conferences);
- long-term follow-up activities (e.g. follow-up evaluation or visit).

2.3.5. System of appeal

The agency documents a method for appeals against its decisions and how this methodology is applied to the needs of the agency. It must be evident from the documentation to what extent the appeals system is based on a hearing process through which the agency can provide those under evaluation a means to comment on and question the outcomes of the evaluation.

Basically, the agency must provide evidence that the appeals system provides for those under evaluation an opportunity to express opinions about evaluation outcomes.

2.4. Additional documentation

This additional documentation should provide an account of the use of surveys, statistical material or other kinds of documentation not mentioned elsewhere. This material should be public.

2.5. Procedures for a quality system for agencies

The agency must document that it has in place internal quality assurance mechanisms that conform to those stipulated in the European standards for external quality assurance agencies.

2.6. Final reflections

An analysis of the agency's strengths, weaknesses, opportunities and threats is needed in order to give an account of the capacity of the agency to adapt to new demands and trends and to permanently improve its actions while maintaining a solid and credible methodological framework and governance model.

3. Guidelines for the external review panel

These guidelines describe the expectations to the external review panel. They comprise guidance on:

− appointment and general organisation;
− site visit;
− drafting of the report.

As described above, the agency under review should provide a self-evaluation report according to the provided guidelines. The self-study should be sent to the external review panel no later than a month before the visit.

3.1. Appointment of the external review panel

This section concerns the appointment of the experts that should conduct the review. The external expert group should consist of the following experts:

− one or two quality assurance experts (international);
− representative of higher education institutions (national);
− student member (national);
− stakeholder member (for instance an employer, national).

One of these experts should be elected Chair of the external review panel.

It is also recommended that the panel should be supplemented with a person who, in an independent capacity from the agency, would act as a secretary.

Nominations of the experts may come from the agencies, stakeholders or local authorities but in order to ensure that the review is credible and trustworthy, it is essential that the task of appointing the experts be given to a third party outside the agency involved. This third party could for instance be ENQA or an agency not involved in the process. The basis for the recognition of the experts should be declarations of their independence. However, the agency under review should have the possibility to comment on the final composition of the panel.

3.2. Site visit

A protocol must be available for the site visit along lines such as the following:

The visit is recommended to have a duration of two to three days, including preparation and follow-up, depending on the external review panel's prior knowledge

of the agency under review and its context. The day before the visit the panel will meet and agree on relevant themes for the visit. The purpose of the site visit is to validate the self-study. Interview guides should be drafted with this perspective in mind.

The visit could include separate meetings with members from the agency board, management, staff, experts, owners/key stakeholders and representatives from evaluated institutions at management level as well as members from the internal self-evaluation committees.

3.3. Preparation of the report

Apart from fulfilling the general terms of reference the report must focus in a precise manner on compliance with the European standards for external quality assurance agencies as specified in the self-study protocol, as well as with possibilities for and recommendations on future improvements.

After the visit the external review panel assisted by the secretary will draft a report. The final version should be sent to the agency under review for comments on factual errors.

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In 2007, ministers responsible for the implementation of the Bologna Process submitted national action plans for improving the recognition of qualifications, which is one of the priorities of this process. While the international legal framework for recognition is largely in place, there is still much to be done to improve the framework's implementation.
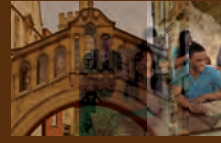
The authors analyse the national action plans, demonstrating that there is great variety in practice among European countries. While some national action plans, provide a clear agenda for further improvement, others merely describe the current state of affairs, offering little indication for further action. This book will be of interest to policy makers and practitioners, and it is hoped that the analysis it provides will encourage further discussion and, above all, improved practice.

The Council of Europe has 47 member states, covering virtually the entire continent of Europe. It seeks to develop common democratic and legal principles based on the European Convention on Human Rights and other reference texts on the protection of individuals. Ever since it was founded in 1949, in the aftermath of the Second World War, the Council of Europe has symbolised reconciliation.