Trends and Models in International Quality Assurance in Higher Education in Relation to Trade in Education

Dirk Van Damme

Ghent University, Belgium

ABSTRACT

Trade in higher education in its many diverse forms transcends and challenges the national regulatory frameworks in higher education, including national quality assurance and accreditation systems. New kinds of international quality assurance and accreditation are seen as the crucial elements of regulation in a more and more trade oriented international higher education market. In this paper four models of development of international quality assurance are analysed: 1) Strengthening the capacities of national quality assurance and accreditation systems; 2) Promoting cross-border quality assurance and the mutual recognition of quality assurance and accreditation; 3) Developing meta-accreditation of quality assurance and accreditation agencies on an international and global level; and 4) Establishing international quality assurance and accreditation schemes. Current developments and strategies in international quality assurance are situated within these four models and discussed with reference to the trade in education issue.

INTRODUCTION

Trade in higher education services is a reality today and its future growth is expected to be very significant all over the world. Trade in education services covers a very diverse and complex reality, ranging from the rather familiar international student mobility, over the establishment of branch campuses in foreign countries and the rise of for-profit and corporate institutions, to the emergence of e-learning suppliers. These developments transcend and challenge the national regulatory frameworks in higher education, including national quality assurance

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and accreditation systems. The question we want to address in this paper is what new kinds of international quality assurance and accreditation are developing in an attempt to steer the development of international trade in higher education services. Indeed, quality assurance and accreditation are called for as the crucial elements of regulation in a more and more trade oriented international higher education market. Strong international quality assurance arrangements are seen as necessary not only to safeguard the learners in their basic consumer rights, but also to defend broader academic values and the fundamental characteristics of the academic/scientific system in an environment where national regulatory frameworks are increasingly inadequate.

Four possible models of development of international quality assurance and accreditation are distinguished:

- The first model departs from the existing national quality assurance and accreditation systems and agencies and tries to strengthen them in view of the international challenges generated by the expansion of transnational education and trade in higher education services. This is the dominant model today and many current developments can be situated in it. It is therefore also the most extensively reviewed model. We have made a distinction between a strategy towards more convergence by stimulating international co-operation (1*a*), and a strategy to open up existing national quality assurance and accreditation arrangements towards "borderless" and tradable higher education such as transnational higher education, private providers, distance education and e-learning (1*b*). The first strategy promotes networking and co-operation between national agencies, in the hope that more communication and exchange will lead to a kind of convergence of systems and international benchmarking of trustworthy standards and methodologies; the second aspires to transform existing quality assurance and accreditation frameworks, so that they are capable to cover also new developments which are especially relevant from a trade perspective.

- The second model upgrades networking and exchange towards real co-operation, for example in joint cross-border quality assessment projects, and formal or informal mutual recognition agreements between agencies and countries, often following agreements on the recognition of qualifications or mobility and credit-transfer programmes.

- The third model aims at the development of validation or meta-accreditation of quality assurance systems and agencies, based upon a conceptual framework and a set of methodological standards for trustworthy quality assessment. The meta-evaluation could result in a formal recognition or eventually a "certification" of the agency and, eventually, in the formal international

acceptance of the quality assurance or accreditation activities carried out by that agency.

- Finally, the fourth model concerns the development of real international quality assurance and accreditation arrangements.

We can say that today the first model surely is the dominant one, but there are also developments and experiments going on in the other models. In this paper we will point out the relevant developments and look at some promising evolutions. For each model we will evaluate the relevance and opportunities, but also the shortcomings and weaknesses in the perspective of the trade in higher education services issue.

MODEL 1A – STRENGTHENING THE CAPACITIES OF NATIONAL QUALITY ASSURANCE AND ACCREDITATION SYSTEMS: ENHANCING CONVERGENCE

In this first model, the existing national quality assurance and accreditation systems are seen as constituting the only legitimate form of quality assurance. Despite important differences in the way these national systems operate, they are considered to be capable to deal with new developments while safeguarding the national interests and protecting diversity in quality assurance. With regard to borderless higher education, e-learning and transnational trade, the shortcomings of these national systems are recognised, but in the eyes of the proponents of this model, they can be corrected by strengthening the capacities of quality assurance and accreditation agencies in dealing with these developments. Probably, this model is the dominant one today. Consecutively, we will give an overview of the development of national quality assurance and accreditation systems, analyse the convergence and diversity in these systems, examine the capacity of national systems to contribute to the regulation of trade in higher education services, and look at a number of initiatives to improve the coverage of transnational higher education, distance education and e-learning by national agencies.

Since the creation of the first quality assurance agencies in the eighties, quality assurance has become a central objective of governmental policies and an important steering mechanism in higher education systems worldwide. Undoubtedly, quality has been the central concept and the major focus of institutions and governments in the field of higher education in the nineties. Many countries now have established national quality assurance arrangements or are in a process of doing so. Today, there is no comprehensive worldwide directory or database of existing quality assurance and accreditation agencies, but there are some attempts to develop such an inventory. For example, the Council for Higher Education Accreditation (CHEA) has an "international database" of quality assurance and accreditation agencies and systems in the world. There are various associations and networks that assemble national agencies. The International Network of

Quality Assurance Agencies in Higher Education (INQAAHE) is the most representative association with a worldwide membership. A project has been set up by INQAAHE to collect detailed information on ownership, activities, quality assurance methods, criteria and standards from its members. This information provides an extensive overview of national quality assurance agencies worldwide, their characteristics and their activities. Besides INQAAHE, some regional networks of quality assurance agencies exist, such as the European Network for Quality Assurance in Higher Education (ENQA). These networks are developing various activities in order to improve mutual understanding and exchange of ideas, to develop professionalism in quality assurance and eventually to stimulate common approaches and methodologies.

Convergence and diversity in national quality assurance systems

Transnational copying of quality assurance models and frameworks and the mutual exchange and co-operation activities of networks have led to an increasing international convergence in national quality assurance and accreditation systems. Van Vught and Westerheijden have spoken already in 1994 of the emergence of a "general model of higher education quality assessment". Also El-Khawas (1998) speaks of convergence and an emerging consensus. She sees the current period of experimentation to be superseded by a trend towards stable structures and settled routines. Given the similarity in approaches and methodologies, Woodhouse (1996) also discerns a trend of increasing international convergence. In his view, globalisation of higher education will further stimulate the process of international convergence in quality assurance systems and mechanisms. In the current work of quality assurance and accreditation agencies this trend towards convergence is clearly discernible, for example in the insertion of foreign evaluators in peer review and assessment panels or in the international benchmarking of quality assessment procedures and standards.

As with other consequences of globalisation, this process of convergence and policy transfer has beneficial but also potentially negative effects. There is a lot of concern in the higher education and quality assurance communities for cultural diversity in quality assurance systems; hence, there also is some anxiety that globalisation would result in the imposition of a uniform model of accreditation. Some see potential dangers in exporting quality assurance and accreditation systems from the industrialised world to developing countries and argue for much more simple arrangements in these countries (Vedder, 1994; Lim, 1999). Indeed, it is far from certain that a model that suits one country or region is also fit for accommodating an academic environment in another country. In learning from international experiences on quality assurance it is important to select elements which can be integrated in the national culture and characteristics of the national academic system (Harman, 1998b). The recent rapid spread of the Anglo-Saxon

accreditation model in the developing world and Eastern Europe, for example, carries the risk of being no more than mere imitation without much consideration of the historical-cultural embedding of a model. Importing models because of the perceived overall success of the higher education system of its country of origin may be a risky adventure and a potential source of cultural "imperialism" or "dependency".

The debate about convergence and diversity in national quality assurance systems of course is very relevant for the trade in higher education services issue. National quality assurance and accreditation systems only can contribute significantly to the regulation of transnational higher education trade in as much as they are sufficiently comparable and mutually compatible. Seen from this perspective, the current trend towards convergence is significant but still may not be powerful enough. In order to be able to cope with the regulatory demands in a more trade-oriented international higher education market, there still is too much variation. Even among countries with similar economic, social and political backgrounds, such as the Nordic countries (Smeby and Stensaker, 1999) or Latin America (Kells, 1996), there is very much divergence. When comparing quality assurance regimes, differences rather than convergence seem to dominate the picture (Dill, 2000). The most important dimensions of variation between national quality assurance and accreditation refer to 1) the definition of the concept of quality itself ; 2) the purpose and functions of quality assurance, *i.e.* the balance between internal functions (improvement) and external functions (evaluation, accountability and transparency, steering and funding, accreditation and recognition), and 3) the methodologies used in quality assurance and accreditation. Other important dimensions of international variation include: the responsible agency or unit; issues of ownership and stakeholders, the voluntary or compulsory nature of participation; the focus on research or on teaching and learning, or a combination of both; the focus on the review of programmes or institutions; the reporting (confidential, public, including ranking, etc.); the range of follow-up activities, etc. (Harman, 1998a; Van Vught and Westerheijden, 1994b).

Given the wide range of variety in national quality assurance and accreditation systems, there is a clear need for a process of convergence in order to make these national systems capable of regulating international higher education. Networking, co-operation and mutual exchange already contribute to this, but the convergence thus realised seems not strong enough to keep pace with the growth of transnational trade itself. Therefore, some initiatives have been taken in some parts of the world to accelerate the convergence process in order to improve the comparability and compatibility of national quality assurance systems.

The clearest example of this is the process initiated by the Bologna Declaration in June 1999 in Europe. The Bologna Declaration has the goal "to create a European space for higher education in order to enhance the employability and

mobility of citizens and to increase the international competitiveness of European higher education". Besides the introduction of a common framework of degrees and other objectives, this goal has to be realised also by developing "a European dimension in quality assurance, with comparable criteria and methods". Partly, the Bologna Declaration builds further on earlier initiatives to promote co-operation in the field of quality assurance, such as the European pilot project in the mid 1990s and other initiatives within the framework of the SOCRATES programme. The European Union's Council of Ministers formulated a Recommendation in 1998 dealing with co-operation, focusing more specifically on the establishment of the already mentioned European Network of Quality Assurance (ENQA).

The European experience illustrates how difficult convergence in the field of quality assurance and accreditation is, even in a context where national states have a more general commitment towards encouraging convergence in higher education systems in general. The European pilot project resulted more in sharing experiences in external quality assessment than in developing real internationally comparable approaches. Even within the Bologna process, progress is not very substantial, because of strong national sensitivities and a general denunciation of a uniform European approach, but also because of an underlying disagreement on the question whether accreditation is an appropriate and desirable system.

In 2000 the European Universities Association (CRE, then EUA) launched a project on accreditation, supported by the European Commission under the SOCRATES programme. This project resulted in a set of principles in developing European accreditation models and in a list of possible strategies (Sursock, 2000). To the proponents of European accreditation, the international legitimacy and credibility of the new bachelor- and master-degrees, which were introduced in many countries as a result of the implementation of the Bologna Declaration, necessitates the establishment of transnational accreditation systems. This viewpoint proved to be highly controversial. Two important meetings in 2001, the "validation seminar" of the CRE project in Lisbon and the Higher Education Convention in Salamanca, demonstrated a lack of consensus and support for common European approaches in the field of quality assurance and accreditation. The ministerial conference in Prague in May 2001 was very prudent on the issue and called in a rather diplomatic manner for more co-operation in the field of quality assurance.

For many observers, it is clear that quality assurance and accreditation still are on the agenda of the Bologna process and will become one of the central issues in view of the higher education convention in Graz in May 2003 and the Berlin ministerial conference in September 2003. In preparation of this, the European Universities Association launched two important projects, one on "quality culture" within institutions and one on transnational quality assessments within specific disciplines, and succeeded in getting SOCRATES funding for it. Also the European

student union ESIB, which plays a very active role in the Bologna process, continues to stress European quality assurance as an indispensable component of the making of a European higher education area. Thus, there are some signs of progress, but also of continued dispute and even resistance.

The debate about convergence in quality assurance is complicated by the argument on accreditation; some reject international convergence because they do not accept accreditation and *vice versa*. A good example of this can be found in a recent paper supported by the quality assurance agencies from the Nordic countries focusing on the limits and shortcomings of the accreditation model in Europe, concluding that it is not proven that the competitiveness of European higher education in a global education market would be enhanced through a unified system of accreditation (Hämäläinen *et al.*, 2001; Kälvemark, 2001). Nevertheless, some interesting developments towards accreditation are taking place in Europe, but again most of them stay within the boundaries of the national states. The clearest example is Germany, where the introduction of bachelor-master programmes in 1998 has been accompanied by the establishment of an accreditation system. Also in Finland, Norway, Austria, Spain, Italy and other countries national accreditation systems have been set up or are in development. The Netherlands will establish their accreditation agency in late 2002. An interesting example is the Flemish Community of Belgium, which has stated that it considers itself too small to develop an accreditation system on its own and that accreditation should be developed on an international level. Flanders therefore will co-operate with the Netherlands. In order to prepare this, but also to broaden the initiative to other European countries, the Netherlands and Flanders set up the so-called "Joint Quality Initiative" (JQI). Started at a meeting in Maastricht in September 2001, this initiative has the objective to develop intensive co-operation between quality assurance and accreditation agencies in a number of European countries, such as carrying out joint quality assessments, developing common standards for bachelor/master-degrees, etc. in order to stimulate convergence. The JQI has a more powerful drive towards convergence and structural collaboration than the ENQA network. The initiating Dutch and Flemish ministers hope that in the long run this collaboration could result in structural integration of accreditation systems into a common framework in at least a group of the Bologna countries, but with a strong exemplary significance for the whole Bologna process.

It remains to be seen whether these and other developments of international co-operation between quality assurance systems and convergence in quality assurance arrangements in Europe will produce sufficient comparability and mutual compatibility to meet the regulatory demands of an integrated European higher education area and those of a liberalised global higher education market. The review of the progress made regarding the convergence in quality assurance and accreditation in the Bologna process in the Trends II report (Haug and Tauch,

2001) reveals some steps forward, but indicates also continued divergence in national developments. The still highly diversified nature of the European system of national quality assurance agencies is not only a barrier to the further development of the Bologna process itself, but also to the general capacity of the European quality assurance system to act as a regulatory framework for higher education trade.

Though probably not as visible and powerful as the European example, other cases can be mentioned to illustrate the trend towards more convergence in quality assurance and accreditation systems. Regional free trade agreements and other kinds of international economic co-operation and integration seem to shape fruitful environments for the development of co-operation in the field of quality assurance and accreditation in higher education. A clear case of this is the development of quality assurance and accreditation in Mexico under the impact of the North American Free Trade Agreement (NAFTA). The certification of professional qualifications and the free mobility of professions within the NAFTA has stimulated the co-operation between US and Mexican accreditation agencies and the establishment of Mexican agencies to the example of their US counterparts (Figueroa, 1996; Didou Aupetit, 2000). Collaboration and to some extent standardisation of quality assessment procedures was seen necessary to keep up with the professional mobility stimulated by the NAFTA. In Latin America, MERCOSUR seems to serve similar objectives, by stimulating educational co-operation, recognition of qualifications and collaboration in the field of quality assurance and accreditation (Busnelli, 2000; Ascher, 2002a).

Also in Asia, international co-operation and the APEC (Asia-Pacific Economic Co-operation) free trade agreement stimulate policy transfer and collaboration, and hence convergence, in the field of quality assurance and accreditation in higher education. The issues of mutual recognition of professional qualifications such as engineers and architects has brought co-operation in the field of accreditation on the agenda in the third area of co-operation in the field of education within APEC. Co-operation in higher education in general, and the development of the student mobility scheme UMAP and a related credit transfer scheme UCTS in particular, further stimulate the international co-operation in the field of quality assurance in the Asia-Pacific region.

As in Europe, trends towards more convergence in quality assurance and accreditation systems also meet resistance. Countries fear for the loss of national sovereignty in matters which they see as crucial in safeguarding national policy orientations, and quality assurance and accreditation belong to this category without any doubt. For example, Knight and De Wit (1997) point to the strong concerns for uniformity and imposition of Western standards in Asia Pacific countries. Countries in the process of developing national quality assurance or accreditation systems today look at the inspiring examples elsewhere, but there are also

difficulties and challenges connected to policy transfer in this field relating to national and cultural sensitivities, as Billing and Thomas (2000) illustrate for the Turkish case. There certainly is a growing awareness, but no definite acceptance that convergence and harmonisation of quality assurance and accreditation arrangements are necessary in the context of increasing transnational trade in higher education (Knight, 2002).

MODEL 1B – STRENGTHENING THE CAPACITIES OF NATIONAL QUALITY ASSURANCE AND ACCREDITATION SYSTEMS: MAKING THEM MORE "BORDERLESS"

A second strategy, based upon the same model of strengthening existing national quality assurance and accreditation systems, is to "open" up the quality arrangements, so that they not only cover the familiar domestic, public, brick-and-mortar universities delivering face-to-face education, but are applicable also to transnational, private, for-profit education and new delivery modes such as distance education and e-learning.

Quality assurance of international programmes and "collaborative provision"

Most quality assurance and accreditation systems are developed by the state or by the higher education sector with close supervision and under legal frameworks by the state. In most cases, their focus is confined to assuring the quality of programmes delivered in the country itself to domestic students. The development of quality assurance and accreditation systems has not been affected by the various forms of internationalisation that emerged in universities in the same period. It is remarkable that in the emergence of the quality assurance movement in higher education, factors related to internationalisation only had a marginal impact. Increased international competitiveness in higher education, international mobility of professional labour, etc. were not very important issues in national quality debates and policies.

However, the rapid expansion of activities, projects and programmes in the field of internationalisation in recent decades has not been without quality drawbacks. Institutions' marketing initiatives in the eighties, in which recruitment efforts of foreign students were seen as an investment in order to generate additional income compensating for declining governmental funding, have lead in a number of institutions, for example in the United Kingdom, to quality problems and resulted in criticisms from students, staff and outside stakeholders (Bruch and Barty, 1998). Among other factors, this has given way to a concern for the quality of the internationalisation processes and policies themselves and the quality of programmes delivered abroad (Van der Wende, 1999; Van Damme, 2001a). In most quality assurance and accreditation systems internationalisation activities of an

institution are not fully covered. Therefore, specific measures have been taken and quality assessment instruments developed for the field of internationalisation policies and programmes.

An important initiative in this regard is the Internationalisation Quality Review (IQR), jointly developed by the Institutional Management of Higher Education (IMHE) of the OECD, the Academic co-operation Association (ACA) and the CRE/EUA from 1995 onwards (Knight and De Wit, 1999). Based upon the familiar dual quality assessment methodology of self-evaluation and peer review, it is an instrument to assess various quality aspects of the internationalisation activities and policies of the institution. Large-scale implementation of such instruments and procedures could further promote quality assurance in the field of transnational education and develop sound international quality standards for such activities.

In recent years the view has gained weight that the quality assessment of internationalisation policies and practices must not remain a specific activity of separate quality arrangements, but has to be integrated in the general quality assurance mechanisms of institutions and countries. In many cases, quality assurance procedures have been opened to include a review of internationalisation policies and practices in institutions, and a review of programmes delivered in foreign countries, directly or in collaboration with domestic institutions abroad. Most European and US quality assurance and accreditation schemes now include a section on internationalisation.

An important approach in this regard is the establishment of "codes of practice" or "codes of conduct" in the field of international programmes. Bruch and Barty (1998) for example, list the various codes developed in the United Kingdom for dealing with recruitment, marketing activities, information, admission procedures, welfare support, etc. of international students. A number of organisations and associations try to implement and to monitor these recommendations and codes in their member institutions: the Education Counselling Service (ECS) of the British Council or UKCOSA, the UK Council for International Education, for example. Gradually, specific quality assurance procedures and instruments in the field of international education have been developed. For example, in the United Kingdom the then Higher Education Quality Council (HEQC) produced such an instrument (*Code of Practice for Overseas Collaborative Provision in Higher Education*), and the Quality Assurance Agency (QAA) has developed it further (QAA, 1999). Another example is the Netherlands, where in 1994 the Inspectorate for Higher Education reviewed the quality of the internationalisation policies of institutions in higher education (Van Overbeek, 1997). Also the Global Alliance for Transnational Education (GATE) has worked out its "*Principles for transnational education*" in 1997. The main focus of these codes and guidelines is the "consumer protection" of foreign students. When applicable on a wider scale, these codes can fulfil an important role

in the quality assurance of forms of transnational provision and "consumption abroad".

In more recent codes of practice a shift can be discerned from a concern for the protection of the interests and rights of foreign students in domestic institutions towards a guarantee that the academic quality of transnational programmes delivered by an institution in other countries is comparable to the programmes of that institution in the home country. An influential example is the "*Code of Practice for the Assurance of Academic Quality and Standards in Higher Education: collaborative provision*", issued by the Quality Assurance Agency (QAA) in the United Kingdom in 1999. This code made programmes of UK universities delivered elsewhere subject to the same quality assurance procedures and standards as programmes delivered in the United Kingdom. The Australian Vice-Chancellors' Committee has published a similar code in 1998 and also many US accreditors have done so. In 2000, the French rectors' conference has adopted a charter which states that French universities should be responsible for the quality of programmes delivered abroad. Not many similar explicit initiatives or regulatory codes can be found in other European countries, although in practice national quality assurance agencies also look at programmes delivered abroad when assessing the home institution. The Transnational Education Report, commissioned by the Confederation of European Union Rectors Conferences (CEURC) in 2000, recommends the development and use of national codes and the adoption of explicit policies by quality assurance agencies regarding the responsibility for transnational programmes by domestic institutions (Adam, 2001).

A very important, more international initiative has been the recent adoption by the UNESCO and the Council of Europe of a "*Code of Good Practice in the Provision of Transnational Education*" in Riga in June 2001. This code of good practice, building further on the QAA code and others and closely linked to the Lisbon Convention on the recognition of qualifications, puts forward a number of essential principles concerning the quality assurance for transnational arrangements that signatory countries should respect.

These codes in fact signify that quality assurance arrangements should follow transnational provision from the exporting country to the receiving country, a principle which implies that quality assurance systems implicitly are exported to countries in which they don't have a legally recognised status. This runs counter to the prevailing principle that the receiving country remains solely responsible for the degrees delivered on its territory and for the quality assurance arrangements protecting them (Campbell and Van der Wende, 2000). In fact, many importing countries – often without strong quality assurance and accreditation systems themselves – demand that the exporting nations have rigorous and reliable quality assurance systems in place in which they can have faith.

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As a consequence of these and other codes of practice transnational activities of institutions increasingly are being covered by quality assurance agencies in the home country, especially in the main exporting countries, the United Kingdom, Australia and the United States. American regional accreditors, for example, have assessed and accredited American branches and institutions active in other parts of the world. In the United Kingdom, institutions are required by the QAA to provide evidence of the comparability between programmes and student learning outcomes in the home country and the country in which transnational programmes are delivered. The QAA has conducted a large number of quality audits of UK provision in foreign countries. From its audit reports the QAA concluded that the overall quality of "collaborative provision" is trustworthy and that degrees delivered by UK universities in foreign countries more or less have the same value as degrees delivered by the same institution in the home country.

However, it remains a topic of debate whether the quality assurance and accreditation of transnational provision has to be done by the appropriate agencies in the home country of the degree-awarding institution, or that it has to be subject to the accreditation arrangements in the receiving country. The codes discussed in this section take the first option, with the argument that, for example, a British degree should be quality assured by the UK system. However, some experts doubt the validity of this approach. Hodson and Thomas (2001), for example, argue that the principle of comparability does not do justice to the diversity in higher education systems and cultures, and that the criteria, procedures and indicators used in quality assurance of transnational provision may not be appropriate to or well understood by partner institutions or students in host countries. Exporting quality assurance systems can further intensify the risks of cultural intrusion and "imperialism" already inherent in transnational delivery. Institutions willing to adapt their programmes delivered elsewhere to local needs and expectations, can be penalised for this by their home quality assurance mechanisms for not guaranteeing comparability. Again, the issue of diversity and cultural sensitivity is put against the drive towards internationalisation of quality assurance and accreditation.

Quality assurance of non-national, private and for-profit higher education

Another objective in the strategy of broadening the scope of national quality assurance and accreditation systems concerns extending their coverage to include also private and for-profit higher education. Since transnational provision of programmes by public universities coming from another country in most cases is considered to be "private" provision in the receiving country, also the quality assurance of transnational higher education by the receiving country is addressed in this section.

The emergence of other providers than the domestic "public" universities – new private, for-profit institutions, foreign institutions operating in a country under franchising or twinning agreements with local providers, sometimes even separate for-profit subsidiaries of public institutions, etc. – has caused concern in many countries. Especially in developing countries or in countries in transition, governments have felt the need to increase their control over these new providers. National sovereignty over standards, curricula and degree-awarding powers of institutions had to be protected in order to safeguard the inclusion of higher education in national economic, political and cultural policy objectives. Often, these concerns were raised under the umbrella of "quality". Private and foreign provision was seen in many cases as corrupted and not respecting national standards, an idea nurtured by some scandals and a wide-spread panic over the misbehaviour of diploma mills and other rogue providers. While the problem of charlatans, easy money-making enterprises and even criminal activities must not be neglected, the quality concerns often also were driven by an unexpressed, rather protectionist coalition of governments and domestic institutions interested in preserving the *status quo*.

Many countries now have introduced legislation requiring private and foreign providers to be registered by governmental education departments and to undergo procedures to get a licence to teach (Maxwell *et al.*, 2000). Well-known examples of such legislation can be found in Australia, Hong Kong, Malaysia, some Canadian provinces and many Eastern-European countries. An APEC survey concluded in 2000 that nearly all member countries had licensing procedures for dealing with private higher education (APEC, 2000). Other countries take a much more restrictive position towards private education. Countries such as Israel and South-Africa have introduced rather harsh measures to stop the development of private and foreign provision on their territory with the argument that it circumvented or jeopardised national policy objectives and national sovereignty or that it counteracted the principle that education was a public good not tradable on the market. In Europe most countries have no specific policies for dealing with incoming transnational higher education or private providers, but as long as these institutions do not seek to award officially recognised degrees within the national framework, this is not seen as a big problem (Adam, 2001). In fact, this means that private and foreign providers in most cases cannot enter the higher education market, but that they are tolerated merely on the basis of general free market regulations applicable to the service sector. There are other kinds of regulations that hinder the entry of domestic higher education systems by private and foreign providers, such as legal protection of the label "university". The only example of international co-ordination of regulations dealing with this issue is the Council of Europe's Committee of Ministers Recommendation R(97)1, listing a number of criteria for the initial recognition of private institutions of higher education including,

for example, the enactment of statutes to provide for elective governing bodies and officers, for adequate permanent facilities, and for the restriction of the "university" title to institutions covering more than one discipline (Farrington, 2001).

Also absence of specific legislation or regulation can serve protectionist policies, as is the case in many countries where degrees delivered by other than state recognised institutions have no legal value. In fact, this is the case in many Western-European countries. Some countries, such as Greece, have taken a rather extreme position in this by translating the constitutionally guaranteed responsibility of the state for education into a complete dismissal of private and foreign provision. The WTO has noted that in many Western European countries giving access to private providers to enter the market requires a parliamentary decision, which in fact means a new legislative initiative. Of course, absence of provisions regarding registration, licensing and the recognition of degrees – or even the absence of adequate information to apply for such provisions – severly limits the trade opportunities in higher education in these countries, and is therefore mentioned in the CQAIE list of barriers to trade in higher education.

Besides licensing and other regulations concerning market access for private and foreign providers, a second category of policies confer the opportunity for private providers to enter the national market to quality assurance and accreditation bodies. Some countries such as Tanzania, Nigeria, Kenya, Thailand but also some Canadian provinces have instituted quality assurance agencies that carry out institutional evaluations that result in recommendations concerning licensing private or foreign providers to operate on the national market (Maxwell *et al.*, 2000). India has established its accreditation system in 1994 specifically with the intention to provide a system of institutional accreditation for private initiatives (Stella, 2002). The recently established South African quality assurance agency applies separate accreditation procedures and standards for the public and the private sectors. Australia developed a new accreditation agency within a context of debate on globalisation of higher education and the concern how to deal with not very trustworthy foreign providers entering the domestic market (Ryan, 2001; McBurnie, 2001). Also in Western Europe, a few examples can be found of accreditation systems designed to regulate the supply by private institutions; Austria has set up an Accreditation Council for private institutions, for example. The US accreditation system, where private providers are not treated differently as public institutions regarding access to the voluntary accreditation system, is worldwide only followed in some countries, such as the Philippines.

The rather restrictive stance of many national authorities *vis-à-vis* private and foreign provision and the state monopoly over quality assurance and accreditation in many countries imply that many quality assurance and accreditation systems are not open to non-public and non-national providers. Japan is a clear case of this restrictive policy. Although most European countries adhere to the principle of

national sovereignty over higher education provision on their territory and therefore prefer transnational providers to be quality controlled by the incoming country's quality assurance agency, most European quality assurance agencies do not cover private or foreign supply (Adam, 2001). In recent initiatives towards accreditation, for example in the Netherlands and Flanders, cautious stipulations are included to give access to private and foreign providers, without however making clear what the consequences of accreditation would be regarding state funding and recognition of degrees. The CEURC Transnational Education Report (Adam, 2001) urges the national quality assurance agencies in Europe to assume a responsibility regarding quality control of imported education, by monitoring the activities of foreign providers, linking with exporting countries, reporting bogus institutions, seeking bilateral solutions for problems rising and providing advice and information to the public on problems associated with imported and private education.

Even in quality assurance and accreditation systems that are accessible also by private and foreign providers, protectionist functions are clearly observable. It is clear, for example, that in Eastern European countries such as Hungary, Poland or Romania, the development of quality assurance and accreditation schemes in the nineties has to be understood as a response from the state to the increasingly complex situation caused by the establishment of many private higher education institutions. The assertion is valid that the introduction of accreditation arrangements in developing countries and Eastern Europe, but perhaps also elsewhere, is motivated by a continued desire for state-control in a increasingly market-oriented environment. Protectionist considerations are very clear also in cases where not the general quality assurance and accreditation arrangements but specifically designed schemes apply to private and foreign providers.

To a rather high degree defensive and protectionist elements and functions are intrinsic to quality assurance schemes. In many instances, the quality concept behind quality assurance is very vague, also including preoccupations other than a concern for academic standards. Quality assurance schemes often depart from a rather traditional idea of quality higher education, originating from familiar face-to-face teaching to young full-time students in campuses. Quality dimensions checked often refer to input- and process-characteristics of conventional teaching and learning modes. While these approaches may be appropriate to common higher education institutions and programmes delivered to the majority of young students within national systems, they are not always easily applicable to innovative and unfamiliar teaching and learning environments often found in transnational and private higher education. The very concept of comparability found in codes of practice for transnational and collaborative provision discussed in the previous section, also exemplifies this idea. Private higher education – often targeted at mature, part-time students, having already acquired experiential knowl-

edge and skills, delivered in innovative teaching and learning environments not easily comparable to the familiar university setting, and often leading to new kinds of qualifications – often is tested with quality assurance norms, criteria and biases derived from traditional university environments. There is need for fair quality assurance concepts and methodologies that depart from a basic understanding of academic standards, that accept that these standards can be achieved in a broad variety of teaching and learning environments, and that leave behind input- and process-criteria that are not intrinsically relevant to the achievement of the learning outcomes desired.

Quality assurance and accreditation for distance education and e-learning

Of course, this debate about the appropriateness of existing quality assurance concepts, criteria and assessment methodologies for new developments in higher education has been fuelled to a great extent by the rapid growth in distance education, open and distance learning (ODL), web-based delivery, e-learning, distributed learning or whatever concept is used. Recently, reports on borderless education have provided a picture of the current developments in the field of distance learning and e-learning and of the challenges ahead for institutions and national policies (Cunningham, 2000; CVCP/HEFCE, 2000; Middlehurst, 2001a; Davies, 2001; OECD, 2001). Although detailed statistical information is not available on border-crossing distance education and e-learning, it goes without doubt that an increasing part of existing trade in higher education services is realised by these educational services. Therefore, it is instructive to look at the quality assurance and accreditation issues raised by distance education and e-learning and the recent initiatives taken in this regard.

Distance learning and especially e-learning challenge conventional wisdom on the nature of the teaching and learning process and the kind of learning experience a learner is supposed to receive in higher education. Even more so than private higher education discussed above, e-learning challenges conventional quality assurance and accreditation systems based on familiar input- and process-related norms and criteria, because of a broad range of features: the learning experience is fundamentally different than on-site face-to-face learning, traditional notions of study-load and time invested in courses are no longer applicable, physical campuses are absent, the roles of faculty members are fundamentally different, there is unbundling of parts of the educational activity (for example, separation of curriculum design from actual delivery which in turn is separated from assessment and evaluation), etc. Questions about responsibility for the educational enterprise and external accountability are affected by changing concepts of "institution" and "degree". Concern for standards and unfamiliarity with new developments thus have initiated a heavy interest in issues of quality assurance and accreditation of distance learning. Much of this is happening in the

United States, the country with the most extensive activity in distance education and e-learning. Both the distance education industry and related supportive organisations as the quality assurance and accreditation community have initiated reflection on the issue and have elaborated various kinds of initiatives, which can be very instructive for the global debate (Loane, 2001; Eaton, 2002; Hope, 2001).

The concern for quality was understood by the distance education sector itself and it developed its own standards of sound quality. Examples of this self-regulatory approach in the United States are codes of practice developed by the Western Co-operative for Educational Telecommunications (WCET) in the early nineties (*Principles of good practice for electronically offered academic degree and certificate programmes*), recently redrafted in co-operation with the Commission of Regional Accrediting Commissions (CRAC) (*Guidelines for the evaluation of electronically offered academic degree and certificate programmes*), by the American Distance Education Consortium (ADEC) (ADEC *Guiding principles for distance learning*), and many others (Twigg, 2001). In 2000 the Institute for Higher Education Policy (IHEP), commissioned by the National Education Association (NEA) and Blackboard Inc., published a comprehensive overview of principles, guidelines and benchmarks for distributed and on-line learning and synthesised them into 45 benchmarks (IHEP, 2000; Twigg, 2001). These documents constitute the most extensive and elaborate quality assurance guidelines for distance education and e-learning available today and have received the supportive commitment of the sector.

Another trend is that also the accreditation community and the US government increasingly are concerned with adapting quality assurance and accreditation standards to new delivery modes. Many in the accreditation sector believe that distance education and e-learning do not need separate quality standards, but that existing standards are flexible enough to accommodate for new developments. This inclusive approach is also reflected in the decision of the US Department of Education taken in 1998 that distance education is considered to be implicitly included in the scope of existing accreditation agencies (Loane, 2001). The decision halted proposals to develop a national standard for distance education programmes and assigned the responsibility for quality assurance and accreditation over distance education to the existing agencies. This meant that the US accrediting agencies had to evaluate the distance education activities of institutions under their supervision. However, at the same time also a new accreditation agency, specifically dealing with distance education, was recognised: the Accrediting Commission of the Distance Education and Training Council (DETC).

The accreditation agencies took their job seriously. In 2001 CHEA reported that 17 of the 19 recognised institutional accreditors (regional and national) are actively engaged in accreditation of distance learning (Eaton, 2002). Most of them have modified their accreditation frameworks in order to address adequately the distinctive features of distance education. A much debated change was the dele-

tion of the traditional quality requirement that a high number of the teaching staff should be full-time PhD qualified staff. Some of the accrediting agencies felt it was necessary to develop consistent standards and procedures. The regional accreditors joined together in the Council of Regional Accrediting Commissions (CRAC) and developed its S*tatement of commitment by the regional accrediting commissions for the evaluation of electronically offered degree and certificate programmes* and *best practices for electronically offered degree and certificate programmes* in 2001. Among the national accreditors the picture is more complex and varied. The result is that there is no common review practice methodology for assuring and assessing quality in distance education and that guidelines differ by the type of accreditor and the type of institution or programme reviewed, but this is the consequence of the voluntary and fragmented nature of the American accreditation system. It is a well-known fact that, for example, the North Central Association of Colleges and Schools is a regional accreditor that is both more active and much more lenient in its procedures than other regional accreditors.

Interesting and much publicised cases of accreditation, which proved to be very stimulating in the public debate and the process of reflection and modification of standards and procedures in the accreditation community, were the accreditation of Jones International University and Phoenix University, both for-profit virtual universities, by North Central in 1999, and the candidacy status for accreditation of Western Governors University (WGU) in 2000. Interesting is that for the accreditation of WGU a consortium was formed by four regional accreditors, the Inter-Regional Accrediting Committee (IRAC) (Berg, 1998). The current accreditation status of WGU is unclear.

The quality assurance and accreditation of distance education and e-learning by national agencies in other parts of the world is not as developed as in the United States. In many countries the issue is closely linked to that of the recognition and accreditation of private and foreign providers in general, although in the case of distance learning the providing institutions are not visible and do not operate on the territory. Outside the United States there are not many examples of quality regulation of distance education provision. An important example is the *Guidelines on the Quality Assurance of Distance Learning*, produced by the UK Quality Assurance Agency in 1999. The QAA guidelines follow rather closely the generic guidelines for quality assurance of higher education programmes in general and the guidelines for collaborative provision discussed above. Another example is the guide to E*xternal quality assurance for the virtual institution*, issued by the New Zealand Universities Academic Audit Unit in 1999. In Australia, many universities are so-called "dual-mode" institutions offering face-to-face as well as distance education programmes and both kinds are subject to the same set of benchmarked quality standards (Hope, 2001).

In continental Western Europe no specific set of standards, criteria or benchmarks used by national quality assurance or accreditation agencies for the assessment of distance learning is known, but that does not mean that agencies have not developed internal procedures for dealing with these activities or that there is no attention to the issue (Adam, 2001). Since distance education and e-learning are invisible to authorities in receiving countries – those countries that limit Internet access for their citizens excepted – they generally expect that the quality assurance and accreditation systems in the sending countries are powerful enough to check the quality standards of programmes delivered electronically elsewhere. In their report for ENQA Campbell and Van der Wende (2000) list a range of implications and questions that have to be answered when applying quality assessment procedures to distance learning and e-learning provision.

A recent small-scale survey of the UNESCO Global Forum indicates that the European situation also is the case in many other parts of the world. In general, outside the United States existing quality assurance and accreditation frameworks seem to be rather strict and not very adaptive to change in dealing with private providers and distance learning provision. As Salmi (2000) asserts, rigid bureaucratic regulation and administrative procedures hamper the capacity of institutions to adapt swiftly and flexibly to changing needs, opportunities and challenges and to new kinds of activities. Not surprisingly, quality assurance and accreditation, precisely designed to safeguard and protect academic standards, together with licensing procedures and regulations concerning recognition of foreign qualification are among the least flexible elements of the national higher education regulatory frameworks.

MODEL 2 – PROMOTING CROSS-BORDER QUALITY ASSURANCE AND THE MUTUAL RECOGNITION OF QUALITY ASSURANCE AND ACCREDITATION

Also the second model departs from the legitimacy of national regulatory frameworks and regulations in the field of quality assurance and accreditation, but situates international co-operation at a higher level, namely that of formal co-operation and mutual recognition by bilateral or multilateral agreements. In contrast to informal networking, aiming at convergence via information exchange and collaboration, this strategy leads to formal networks of mutually recognised quality assurance and accreditation agencies. Under the heading of this strategy, we deal with various developments such as joint and cross-border quality assurance and the quality assurance implications of mutual recognition agreements of qualifications.

Joint and cross-border quality assurance

We have discussed already some cases of international activity of quality assurance and accreditation agencies, for example when national agencies assess

the quality of programmes of an institution delivered abroad. Mostly this is done without much contact with the quality assurance agency in the receiving country. However, there are also cases in which the quality assurance in the home country gets in touch with the agency in the host country, and involves the latter in the assessment of programmes delivered in its country. The QAA of the United Kingdom, for example, has collaborated in this direction with agencies in countries receiving UK transnational education programmes. In such projects, there is not only exchange and communication, but real and formal collaborative work addressing quality standards and assessment methodologies. In fact, the collaborating agencies recognise implicitly the validity of each others' work and resulting statements. Seen from the perspective of trade, formal collaboration and mutual recognition between the quality assurance agencies of the sending and the receiving country could be a fruitful avenue of development.

Quality assurance and accreditation agencies sometimes are active in other countries than their own, not to assess transnationally delivered programmes of institutions under their own realm, but because they are asked to accredit programmes delivered by institutions in the host country. This has been a well-known phenomenon along the US borders, for example, by Mexican universities seeking accreditation from the regional accreditors operating in the Southern states of the United States, but gradually this practice has become more wide-spread. Some US based specialised accreditors such as the Association to Advance Collegiate Schools of Business (AACSB), the specialised accreditor for business education in the United States, and the Accreditation Board for Engineering Technology (ABET), are frequently invited in various other parts of the world to assess and eventually "accredit" foreign institutions or programmes. ABET doesn't offer real American accreditation to engineering programmes in foreign countries, but grants them a kind of "substantial equivalence" to US accredit programmes. ABET has accredited engineering programmes in a broad range of countries in Europe, Latin America and Asia. Partly, institutions ask US accreditors to do this because US accreditation is perceived in other parts of the world as high level and trustworthy quality assurance; partly, they do it for marketing reasons and to use US accreditation as a marketing label on the home market.

The expansion of the export of accreditation services has caused concern and debate in the US accreditation community. In 1999 CHEA concluded from a survey among its member accrediting organisations that 17 of them accredited 178 US institutions operating outside the United States and that 24 of them accredited 175 non-US institutions abroad (Ascher, 2002a). The need was felt to develop quality standards and a code of good practice for this kind of international quality assurance and accreditation activities. In 2001 CHEA approved a document, *Principles for United States accreditors working internationally: accreditation of non-United States institutions and programmes*. Such principles include the assurance of organisational

capacity to engage in such activities, the provision of clear information on the scope and the value of US accreditation, but also consultation and co-operation with quality assurance agencies in the countries where reviews are undertaken.

Real joint quality assessment experiments, executed jointly by several quality assurance and accreditation agencies from different countries, is not a widespread phenomenon, but some interesting examples are worth mentioning. Already in the European pilot project in 1994-95 there were parallel programme reviews in engineering, communication and design in some countries. In 1999 a real cross-border quality assessment project was carried out in physics, in which the Flemish, the Dutch and a German quality assurance agency collaborated structurally. In this project a joint methodology was developed, formally adopted by the three participating agencies, and the peer review panels were the same for all site visits in the participating universities. Under the umbrella of the already mentioned Flemish-Dutch "Joint Quality Initiative" new experiments are planned with cross-border joint quality assessments. In the Nordic countries an experiment of joint quality assessment involving the Danish and Finnish evaluation agencies was set up, leading to the bilateral recognition of both agencies. Also the new European SOCRATES project of ENQA will include joint quality assessments in a broad range of disciplines in a large group of European countries. It is evident that in such projects, there is at least an implicit and often also an explicit formal mutual recognition between the participating agencies. In Europe, mutual acceptance of quality assurance and accreditation outcomes by national agencies is widespread, although not frequently formalised in real recognition agreements.

Recognition of qualifications and the recognition of quality assurance and accreditation

Formal agreements on the recognition of foreign qualifications often imply the implicit or explicit mutual recognition of quality assurance and accreditation systems. Recognition of qualifications is an old and complicated problem in higher education. A distinction has to be made between academic and professional recognition of qualifications. Academic recognition refers to the recognition of foreign degrees or diplomas (or study periods and credits) as education credentials as such and is in most countries a responsibility of governmental bodies; professional recognition has to do with the right to work as a professional, more in particular in nationally or internationally regulated professions.

In many countries, the academic recognition of qualifications still is a matter of verifying equivalence by comparing curricula. Since the late eighties in certain regions the notion of "equivalence" has been exchanged for that of "acceptance", whereby a foreign qualification no longer has to be based on a highly comparable curriculum but can be accepted even if there are differences, on the condition that

the curricular discrepancies can not be defined as "substantial difference". The most impressive development in this has taken place in the European region, in the UNESCO definition. Already in the fifties the Council of Europe has set up conventions and information centre networks, within an overall policy to enhance mobility and mutual acceptance of credentials in Europe. Also UNESCO, via its centre for higher education CEPES in Bucharest, has been very active in this field. Co-operation between the two organisations has resulted in an important convention, replacing the existing ones, namely the *Convention on the recognition of qualifications concerning higher education in the European region*, adopted in Lisbon in April 1997, also called the *Lisbon Convention*. National information centres, the ENIC, serve as centres facilitating recognition procedures at national level. From the side of the European Union, a separate network of centres, the National Academic Recognition Information Centres (NARIC), was set up from 1984 onwards closely related to the ERASMUS programme. Both networks are closely interlinked and meet regularly to exchange information and adopt similar guidelines.

The Lisbon Convention and the ENIC/NARIC network are powerful tools for stimulating the recognition of degrees and diplomas. However, the convergence in national policies and regulations still is not yet optimal, because of variation in the nature and the authority of the centres in the national context (Campbell and Van der Wende, 2000). The implications for quality assurance are not very clear. Only very recently there is more co-operation between the international recognition community and the quality assurance world. Campbell and Van der Wende (2000) state that lack of acquaintance with national quality assurance developments is responsible for rather conservative attitudes towards the assessment of new degrees. To them, more transparency and international convergence in quality assurance processes certainly would foster mutual recognition and acceptance of qualifications, thus decreasing the bureaucracy of recognition. A small survey at the occasion of the fifth anniversary of the Lisbon Convention among the ENIC/NARIC network indicated that difficulties in accessing information on the status and quality of higher education institutions and their programmes constituted one of the major obstacles to the recognition of qualifications. On the other side, there are also indications that decisions taken regarding recognition of academic qualifications in the Lisbon area more and more are influenced positively by trust in the national quality assurance and accreditation systems. Thus, developments in the field of recognition of qualifications could also foster the implicit or explicit recognition of quality assurance systems.

Transnational education and trade in higher education services increasingly affect the European approaches in academic recognition. Although the Lisbon Convention does not deal specifically with the specific recognition issues which are emerging as a result of the rapid development of transnational education, the principles underlying it are seen as powerful enough to remain the normative

framework for dealing with those developments (Wilson and Vlasceanu, 2000). It remains to be seen whether the Lisbon Convention will be able to cope with recognition issues in the context of trade in higher education services, if the issue of recognition of quality assurance and accreditation is not addressed directly.

The European model of recognition of degrees has not been followed by the rest of the world. Most countries, including the United States, still apply very detailed and complicated procedures based on equivalency tests and refuse automatic recognition of foreign degrees. These procedures encompass detailed analyses of course and curriculum structure, contents, examination systems, etc. However, also in this context there are clear links to quality assurance and accreditation. In its equivalency decision-taking processes the US Department of Education takes into account the existence of accreditation systems in foreign countries that are considered to apply standards comparable to those used by US accreditors. In fact, this means a sort of formal recognition of foreign accreditation systems by the United States. However, the lack of comparability between national quality assurance and accreditation systems impedes progress in this field. In 1995 the US "National Committee on Foreign Medical Education and Accreditation" looked at accreditation procedures and standards used for medical schools in a large group of countries and concluded that the standards used in 23 countries were comparable to those used in US accrediting bodies. This decision eased the equivalency procedures for foreign medical doctors in the United States and implied a formal recognition of foreign accreditation systems. But in this process a large number of national quality assurance systems in, for example, European countries were regarded to be essentially different from US accreditation. Medical doctors coming from those countries to work in the United States experienced that this decision put an end to the more or less automatic recognition of their qualifications. Only after insistence from the side of some European countries that their quality assurance mechanisms, although not formally leading to accreditation statements, were to be considered as functionally equivalent in the standards used, the conflict was solved. This case illustrates that formal recognition of national quality assurance and accreditation systems can contribute a lot to make the issue of recognition of foreign qualifications less problematic and bureaucratic, but also that the huge divergence in these systems and the lack of comparability and international standards for quality assurance and accreditation hinder further progress in this domain.

Professional recognition of qualifications is a still more complicated matter than academic recognition by public authorities, because national differences in the organisation of the professions have to be taken into account. In most continental European countries academic degrees also serve as professional qualifications, giving access to professional careers without additional examinations or training. In many countries however, this automatic recognition of academic

degrees as professional qualifications is under heavy pressure. Several professions, in the field of law, accountancy, medicine, etc., impose additional requirements to holders of academic degrees for entry into the profession. This evolution is seen as very problematic by the universities, since they consider it as an erosion of the professional value of their degrees. In the United Kingdom, Ireland, Australia and the United States there is already a great gap between academic qualification and professional qualification, gained after specific training or examinations by professional bodies. Professional associations often have developed their own "accreditation" procedures for recognising academic programmes and degrees as eligible for professional qualifications. Thus, for example, in the United Kingdom, there is a myriad of accrediting bodies linked to professional associations that assess whether a programme – and thus the students graduating from that programme – meets the standards and other requirements imposed by the profession.

Increasing professional mobility, the internationalisation of the professions developing their own international associations, and especially free trade agreements dealing with mobility and trade in professional services, have brought the issue of professional recognition to the international level (Mallea, 1998). There is now a clear tendency towards mutual and multilateral recognition agreements to solve issues of professional recognition and equivalency of standards and procedures. Free trade agreements have stimulated this development powerfully: EU, NAFTA, ASEAN, APEC, MERCOSUR, etc. all have regulations dealing with professional services leading to professional recognition. Besides, also bilateral agreements exist dealing with the mutual recognition of professional qualifications. The GATS, as the first worldwide multilateral free trade agreement on trade in services, also has contributed to progress in this domain. Both WTO and OECD have devoted papers and meetings to this issue in the late nineties (Mallea, 1998), and the issue again is on the agenda for the current GATS negotiations. Even without inclusion of higher education services in the GATS, the regulations dealing with trade in professional services and the recognition of professional qualifications in the GATS will deeply affect higher education. There certainly is need for a complete inventory of mutual recognition agreements dealing with professional recognition in a broad range of professions.

An early and very influential example of mutual recognition of professional qualifications is the "Washington Accord" for the engineering profession, reached in 1997 between engineering organisations of Australia, Canada, Ireland, New Zealand, United Kingdom, and the United States. South Africa and Hong Kong have joined the accord recently and also Japan is now candidate for membership. The accord recognises the "substantial equivalence" of each other's programmes in satisfying the academic requirements for the practice of engineering, while not yet formally mutually recognising professional qualifications. Interesting is that

the Washington Accord also has included criteria, policies and procedures for the accreditation of academic engineering programmes. It agrees that the signators accept accreditation decisions among each other and thus recognises formally the equivalency of national accreditation mechanisms in each country. The already mentioned American accreditor ABET has played a leading role in this development.

The example of the Washington Accord is seen as very promising and inspiring in other countries and by other professions. European engineering associations tried to get an agreement with ABET for the mutual recognition of each other's engineers, but this attempt has failed unfortunately. Agreements with a similar scope and content have not yet been reached in other professions, but there are numerous less far-reaching mutual recognition agreements in other professions, mostly within the context of free trade agreements. International professional associations are developing guidelines on recognising standards of professional programmes, mostly respecting national sovereignty and denouncing uniformity. Progress is discernable in the architecture, legal and accounting professions. These guidelines often deal implicitly with quality assurance and accreditation standards. However, few of them deal explicitly with mutual recognition of accreditation or quality assurance mechanisms. Precisely this makes the Washington Accord such an interesting model.

Recognition of quality assurance in mobility and credit-transfer programmes

Another example of mutual recognition of quality assurance and accreditation systems can be found in the domain of mobility programmes and credit-transfer programmes. Organised student mobility programmes are a well-known feature of internationalisation policies of regional organisations, national governments and institutions. The ERASMUS/SOCRATES programme in Europe and the UMAP in the Asia-Pacific region are specifically designed to promote regional student mobility. Of regional nature is also the NORDPLUS-programme of student exchange in the Nordic countries. Other examples of regional student mobility programmes can be found.

Alongside these mobility programmes, sometimes also credit-transfer schemes have been developed. The best known is the European Credit Transfer System (ECTS), an institutional framework for credit recognition and transfer for students studying abroad in the ERASMUS/SOCRATES programme. Started in 1989 as an experiment in a restricted number of disciplines and institutions, it was fully integrated in ERASMUS/SOCRATES from 1995/96 onwards. ECTS is not intended as a solution to problems of equivalence of courses and credits as far as contents or quality are concerned. It is rather a framework within which participating institutions agree to recognise quite automatically delineated components of study and

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thus facilitate the transferability of credits. Also within UMAP a credit-transfer system is under construction.

Student mobility between programmes in different institutions and the implied procedures of recognition of study periods abroad and the transfer of credits or study-points to the home institution presuppose mutual trust in the quality of the partners involved. In ERASMUS-projects this trust is not explicitly expressed, but a number of instruments such as a uniform mechanism for calculating study-load, an extensive "information package" and the so-called "transcript of records" must give the home institution sufficient confidence in the quality of the learning experience a student has received elsewhere. The presupposition is that first of all universities engage in internal quality assurance mechanisms and that they are externally quality assured by their respective national agencies; state recognition of institutions and programmes is seen as a guarantee for sufficient quality. Even if the standards and methodologies of national quality assurance and accreditation arrangements are not addressed directly by the ERASMUS-programme, there is a kind of implicit recognition of the validity and strengths of the national systems in the whole European region.

However, some questions can be raised concerning the lack of formal quality checks in the ERASMUS-programme (Van Damme, 2001a). ERASMUS and ECTS are based on a maximalist reading of the concept of "acceptance" or "recognition" by asking an *a priori* acceptance of foreign credits by the home institution, without any prior check of contents, teaching methods, workload, student assessment procedures, etc., in short without any reference to quality. In its pragmatic and voluntaristic approach and with its reliance on a great deal of optimistic (some would say "naive") trust and confidence, it has chosen to bypass questions of content comparability, educational culture and, of crucial importance, comparability and compatibility of quality assurance arrangements. In order to realise a policy of mobility, European internationalisation policy in higher education has left the quality issue almost completely aside. Only recently, under the impulse of the Bologna process, quality assurance questions have been taken up within the European programmes.

In the UMAP programme the quality issues involved in student mobility are explicitly addressed. The first principle in the UMAP Constitution goes as follows: "UMAP programmes operate between individual accredited higher education institutions, or consortia of institutions, on the basis of mutual acceptance of the appropriateness of national accreditation determinations. All public or private higher education institutions located in countries or territories participating in UMAP, and recognised in the participating home country as nationally accredited, or as reputable of higher education courses, are eligible to participate in UMAP programmes". This phrase implies a formal mutual recognition of national accreditation systems and their accreditation decisions within the whole UMAP region.

MODEL 3 – DEVELOPING META-ACCREDITATION OF QUALITY ASSURANCE
AND ACCREDITATION AGENCIES ON AN INTERNATIONAL AND GLOBAL LEVEL

Networking between national quality assurance and accreditation agencies
and mutual recognition among them are described in Models 1 and 2. Networking,
exchange of information and collaboration can be done in full respect of each oth-
ers' autonomy and sovereignty. Differences in standards and assessment method-
ologies are perhaps addressed as matters for dialogue and mutual understanding,
but are accepted as belonging to the individual autonomy of each agency. In the
second strategy mutual recognition is based on the acceptance of non-substantial
differences within a basic agreement on the validity of each others' standards
and methods. In the third model again a higher degree of integration is aspired.
Here, quality assurance and accreditation systems are evaluated on the basis
of an agreed set of standards for sound and trustworthy quality assurance. In
other words, professional standards are developed for the international quality
assurance and accreditation sector and put into practice in various forms of meta-
accreditation.

**Assessing membership criteria for quality assurance and accreditation
associations**

Quality assurance and accreditation agencies have developed their own
national and international associations. INQAAHE is already mentioned as the
worldwide association of national agencies. For the moment, INQAAHE has very
few standards to check membership applications. Full membership is open to
bona fide agencies and there are procedures to ensure that applicants satisfy this
criterion before admission (Woodhouse, 2001). This is a paper exercise without
any real examination of the seriousness of the applicants' quality assurance stan-
dards and procedures. membership of INQAAHE therefore is not to be seen as a
positive sanction on the validity of the members' quality assurance and accredita-
tion procedures. The same applies for regional quality assurance networks, such
as ENQA. These associations do not feel this to be a problem, since their primary
objective is to provide mutual support and exchange of information among their
members. The lack of explicit professional standards, compared with those devel-
oped in international associations in other professional fields, is not seen as a
problem by the outside world neither, although – in the case of ENQA in the
context of the Bologna process, for example – international authorities put a great
deal of confidence in these associations.

Within INQAAHE there have been proposals to develop such professional
standards for trustworthy quality assurance and accreditation. The former presi-
dent David Woodhouse is a promoter of this strategy. He believes INQAAHE
should tighten membership criteria by testing the applicants' assessment stan-

dards and procedures against those professional standards. INQAAHE would then become a professional organisation comparable to its equivalents in other fields of professional services. It also would be able to function as a vehicle for mutual recognition of qualifications assessed by its members, thereby guaranteeing that these assessments are executed according to the standards accepted by the profession (Woodhouse, 2001).

The only association of accrediting agencies that has developed professional standards for recognition and membership is the American association CHEA. The organisation assembles all kinds of accrediting agencies in the United States – regional, specialised, national and professional. membership is based on the fulfilment of criteria by which the agency is "recognised". "Recognition by CHEA affirms that standards and processes of accrediting organisations are consistent with quality, improvement, and accountability expectations that CHEA has established." Also the federal Government in the United States recognises accreditors from its own criteria and standards in order to assure that the standards of accrediting organisations meet expectations for institutional and programme participation in federal initiatives, such as student aid. The CHEA recognition procedure is based on three fundamental principles: 1) that an accrediting agency is committed to advance academic standards in higher education ; 2) that accrediting organisations have standards that ensure accountability through consistent, clear, and coherent communication to the public and the higher education community, and 3) that the organisations apply standards that encourage higher education institutions to plan, where needed, for purposeful change and improvement. Furthermore, CHEA has a detailed set of eligibility criteria and recognition standards, including on top of the three mentioned above also the guarantee that agencies employ fair and appropriate procedures and continually reassess accreditation procedures. The CHEA standards deserve wider diffusion and can function as the basis for the development of internationally agreed standards for the "recognition" and "meta-accreditation" of quality assurance and accreditation agencies worldwide.

Developing a worldwide quality register based on a meta-accreditation of agencies

Building further on the work done by these and other associations, proposals have been developed recently to introduce a worldwide register of trustworthy agencies based upon a kind of meta-evaluation or meta-accreditation of agencies by an independent organism. In this idea the basic principles of quality assurance and accreditation are applied to the sector itself.

Meta-accreditation is not completely unfamiliar in the field of quality assurance. The German accreditation system, introduced in 1998, for example, is based

upon this principle. Meta-accreditation can be a very powerful tool at the international level. A kind of recognition procedure, based on the evaluation of quality assurance and accreditation agencies on agreed standards in the professional community, would produce a multilateral recognition of agencies. In turn, this would give programmes, institutions, students, employers and the general public the reassurance that assessment by such an agency is done on the basis of internationally recognised standards. Trust in the quality of quality assurance and accreditation systems would also give a very powerful incentive for significant progress in the field of recognition of qualifications. International meta-accreditation was one of the promising strategies identified by the European Accreditation project carried out by the European association of universities (CRE, now EUA) in 2000 with support from the SOCRATES programme (Sursock, 2000; Van der Wende and Westerheijden, 2001). This option would respect national sovereignty and diversity, while providing transparency and comparability of quality assurance standards and procedures. The project called for the establishment of a European platform to further explore and develop this idea. Unfortunately, as already mentioned, this proposal was not fully embraced by the European academic community at the subsequent Lisbon and Salamanca meetings in the spring 2001, mainly because of resistance against the concept of accreditation but also because of high sensitivity *vis-à-vis* any proposal that would erode the autonomy of national agencies.

Recently a proposal has been introduced for discussion to establish a directory or register of quality assurance and accreditation agencies. The Worldwide Quality Register (WQR) would be developed under the auspices of a consortium of organisations representing the international higher education community, the international quality assurance community and the general international community. For the moment the International Association of University Presidents (IAUP), the INQAAHE and UNESCO, among others, are discussing the proposal. The WQR would include agencies that have been evaluated by a group of independent experts as responding to mutually agreed quality assurance standards and benchmarks. Inclusion of an agency in the WQR guarantees that this agency meets agreed standards for trustworthy quality assurance, such as a clear commitment to develop academic quality in the institutions and programmes evaluated by it, fair and appropriate quality assessment procedures, well developed and publicly available protocols, etc. The initiative would also have a strong developmental approach, by assisting quality assurance and accreditation agencies in development in building up their professional expertise. Proponents of this and similar initiatives emphasise that it is important that the international quality assurance and accreditation community develops its own standards of professional quality and its own accreditation procedures. Without such quality standards, external evaluation and labelling mechanisms, for example of the ISO type, over which the

quality assurance community has little influence, will step in to meet the demand. However, such proposals find themselves confronted with a lot of resistance (Woodhouse, 2001).

MODEL 4 – ESTABLISHING INTERNATIONAL QUALITY ASSURANCE AND ACCREDITATION SCHEMES

The idea of an international agency that would engage in quality assurance and accreditation worldwide or even regionally, may seem strange to many people, but this strategy must not be overlooked when listing the various possible models and trends. This model leaves behind the traditional focus on national quality assurance and accreditation agencies central to the models 1, 2 and 3, and opts radically for arrangements on the international level. The need for quality assurance and accreditation that is internationally visible, together with the slow progress made in convergence, mutual recognition and meta-accreditation of national quality assurance agencies, may well stimulate the idea of developing international accrediting agencies. To many observers, the previous models may not be powerful enough in a context of further growth in transnational and borderless education and of liberalised trade in higher education services. Certainly, establishing a ground for the legitimacy of international quality assurance and accreditation agencies is a sensitive enterprise in an environment without strong international organisations. But it may be possible that the further increase in transnational education and trade in higher education creates the conditions for a development of international quality assurance and accreditation schemes that are considered legitimate by the institutions and their international associations. For the moment, only a few examples of such schemes can be mentioned.

Evaluation mechanisms at the regional level

Some interesting examples of quality evaluation mechanisms operating on a regional level can be found in Europe. We already mentioned the Internationalisation Quality Review (IQR), an audit function, organised jointly by the IMHE programme of the OECD, the EUA and ACA, of the internationalisation policies and practices of an institution. This audit doesn't result in a kind of accreditation statement, but is aimed at improving and strengthening the internationalisation capacity of the institution under review by the familiar dual methodology of self-assessment and peer-review (Knight and De Wit, 1999).

A similar project is the Institutional Evaluation Programme of the EUA. This programme developed in the early 1990s aimed at the institutional evaluation of European universities. After a pilot phase the programme was offered as a service of the European universities association to its members from the mid-1990s onwards. It aims at strengthening the institutional capacities of universities and to

induce them to improve their internal management. There was also a demand coming from the Eastern European higher education systems in transition for getting "recognised" as real European universities (Van der Wende and Westerheijden, 2001). Although universities and university leaders looked at the programme as a kind of institutional accreditation initiative, it did not function as an accreditation scheme. Developments in that direction were aborted in the course of development of the programme. Instead, it extended its developmental functions without a clear evaluative and discriminatory component. An inclusive approach of a membership based association, trying to unite all institutions in Europe, could not be combined with a selective quality assurance or accreditation system. However, in some European countries, the national government stimulates the use of the EUA institutional evaluation programme. In Finland, for instance, the Finnish Higher Education Evaluation Council requires higher education institutions to engage in some kind of external evaluation, without prescribing a single agent or model (Campbell and Van der Wende, 2000). By its "consumers" the EUA institutional evaluation programme thus is used as a kind of external quality assurance or even accreditation scheme.

As already mentioned in our account of the Bologna process, programme or institutional accreditation on a European level is a hotly debated issue, but without much progress achieved. Many countries and national quality assurance agencies resist the development of a regional accreditation system in Europe. What seems not possible in Europe, however, is under consideration in other regions of the world. Interesting is the experiment with regional accreditation in the MERCOSUR region. The educational sector became involved in MERCOSUR activities in 1992 and harmonisation of educational systems was one of its objectives. In higher education a "Memorandum of agreement on the implementation, of an experimental mechanism for the accreditation of undergraduate programmes and recognition of degrees" was signed. A working group investigates the possibilities of establishing a MERCOSUR accreditation scheme of programmes in engineering, medicine and agricultural engineering. The scheme would be a voluntary accreditation system, on top or supplementing existing national accreditation systems, leading to the recognition of degrees in the countries involved. Regional accreditation procedures would start in August 2002.

Networks of universities developing quality assurance and accreditation

There are also some interesting examples of networks of universities developing their own quality assurance and even accreditation mechanisms. Campbell and Van der Wende refer to networks of universities in Europe developing out of ERASMUS and SOCRATES projects, that felt the need for benchmarking its members' activities and thus gradually developed their own internal quality assurance systems. Some did this in order to cope with the mentioned shortcomings of

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ERASMUS and ECTS in the quality dimension. Some of these networks became rather prestigious ones, in which membership could boost the institution's profile in the national and international arena. There, quality assurance and a certain kind of accreditation procedures were used to check the quality level of applying institutions. A good example of this is the Coimbra network, assembling the old, prestigious comprehensive European universities. This network is developing internal quality assurance schemes and is considering to develop an international accreditation system with rather high standards and benchmarks.

A clear example of a network developing its own quality assurance activity is Universitas 21, a network of research universities in North America, United Kingdom, Sweden, Germany, Australia and South East Asia. "U21pedagogica", the quality assurance branch of Universitas 21, is an international provider of independent quality assurance services for higher education programmes and associated activities. Its stated aims are : 1) providing quality assurance of programmes subjects as a basis for their accreditation; 2) developing quality assurance and monitoring processes to ensure that the selection of students into courses and subjects of the network is merit-based, fair and transparent; 3) initiating processes to ensure and monitor the integrity of student assessment and examination for courses and subjects; and 4) providing rigorous and highly credible quality assurance for any e-education venture in which Universitas 21 is engaged. U21pedagogica is going to be the exclusive provider of quality assurance services to "U21global", the joint venture established by Universitas 21 and Thomson Learning. This clearly is an example of a university network that is developing into a potentially important international quality assurance and accreditation system.

Another interesting example is the European Consortium of Innovative Universities (ECIU), a European network of relatively young, innovative and entrepreneurial universities. This network developed its own external quality review process to "accredit" international master's programmes to be delivered transnationally, but because of their innovative character felt outside the scope of traditional US accreditors operating in the receiving countries. Out of the need for a rigorous, yet flexible and transparent form of accreditation, the network set out to build a modest programme within the consortium that would support evaluation or formal accreditation, that would operate with minimal bureaucracy and cost, and that would be scalable, and permit co-operation with other organisations (Phillips, 2000).

A similar initiative, strictly speaking not originating from a university network, but from a network of stakeholders in business education, the European Foundation for Management Development (EFMD), is the EQUIS (European Quality Improvement System) accreditation scheme. This scheme started in 1997 in order to induce quality improvement among the members of the association. Addressing the need for common standards and benchmarks it developed into a real

accreditation system which has acquired a high status in the business school sector in Europe. EQUIS now is the dominant accreditor for undergraduate and post-graduate management institutions in Europe. EQUIS accreditation is even used by some governments as an alternative for national quality assurance or accreditation; in Flanders, for example, EQUIS accreditation was required by the government for a public business school in order to continue its funding. The purpose of the accreditation scheme is real accreditation using rather high standards and benchmarks, but alongside a developmental programme EQUIP was developed for members not yet accredited (Conraths, 2000).

Probably, there are still other examples of university networks establishing their own accreditation schemes. Some national quality assurance and accreditation agencies developed out of networks of universities engaging in quality assurance. Also the US accreditation system developed in such a way. Now taken on to the international level, international university networks may be a very fruitful environment for the development of international quality assurance and accreditation schemes. They illustrate that quality assurance and accreditation no longer are the monopoly of national, governmental agencies, but that the need for international schemes working with mutually agreed quality standards is clearly there. To some degree university networks are filling the gaps left on the international level by national quality assurance agencies reluctant to engage in international activities. Examples such as ECIU show that membership is not necessarily an impediment for the creation of sound quality assurance and accreditation. The trustworthiness of a quality assurance or accreditation scheme depends not only from the instituting authority, but is earned by the use of reliable standards and benchmarks (Van Damme, 1999). Both international professional associations and international university networks constitute probably the most productive milieus in which international quality assurance and accreditation schemes may originate.

A global accreditor

Thus far, there has been only one attempt to build up a global accreditation enterprise. In the mid 1990s the absence of any real global accreditation system for dealing with transnational education was sharply felt by some actors. They didn't expect much from the side of national public quality assurance and accreditation agencies. A key role in this was played by the "Centre for Quality Assurance in International Education" (CQAIE) in Washington, DC This very dynamic and innovative organisation, founded in 1995 by representatives from business, higher education and public authority sectors, organised meetings on transnational education and trade in educational and professional services. From the same environment, the "Global Alliance for Transnational Education" (GATE) was established, an alliance of institutions, quality assurance bodies, governmental organisations and companies with the objective of developing accreditation procedures for pro-

viders of transnational higher education programmes. With a radical change in its governance and a take-over by the corporate interests of Jones International, the stakeholders with an academic background left the initiative. Since then GATE no longer is in a position to play a legitimate role in the field of international accreditation, nor to meet the demands of institutions.

Since then, the development of a real international accreditation agency is considered by many observers to be rather unrealistic, given the resistance of national states (and often also the national quality assurance agencies), but also because many fear that this will lead to a very bureaucratic, costly apparatus escaping any kind of control from governments and higher education institutions. Nevertheless, this strategy should not be put aside too easily. As also Woodhouse (2001) asserts, there certainly is room for an agency that would offer a service of its academic status, legitimacy, credibility, and reputation, such an international accreditor would be able to realise an important position in the global higher education field in short time.

Initiatives to put international quality assurance on the agenda

The issue of international quality assurance has drawn the attention of a number of international organisations and associations. Although not at all considering to become global accreditors themselves, it is worth mentioning them here since they are stimulating debate and development of good practice in this domain. Besides the international quality assurance associations – such as INQAAHE and ENQA – which we have already mentioned, we can also see some interesting initiatives and partnerships developing in university associations and general international organisations.

One of the first initiatives in this domain was the creation of the Commission on Global Accreditation of the International Association of University Presidents (IAUP) at its Triennial Conference in Brussels in 1999. This commission has developed into a fruitful platform for debate on the issues involved and was also the environment in which the idea for a Worldwide Quality Register saw the light. The Commission has members from all over the world and meets regularly.

A more ambitious endeavour involving more constituencies is the "Global Forum on international quality assurance, accreditation and the recognition of qualifications", created by UNESCO in 2002. The initiative was taken following an expert meeting on September 10 and 11 2001 in Paris. A mission statement on the issues to be tackled and the possible strategies to be explored was published. The Task Force of the UNESCO Global Forum met in Lisbon in Spring 2002 and a meeting of the entire Global Forum is scheduled for October 2002.

CHEA has already convened some three expert seminars on international quality assurance, inviting experts from all over the world to discuss issues in this

domain. As a result of these meetings, an International Commission was installed in 2001. The International Commission gathered for a seminar in San Francisco in January 2002 and discussed a number of possible lines of action.

The Washington-based Centre for Quality Assurance in International Education (CQAIE) is already mentioned as a meeting point for the issue of quality assurance in international higher education. The last years it serves more as a lobbyist on the issue of barriers to transnational education, trade in higher education and the inclusion of higher education in free trade agreements such as the GATS. The CQAIE is said to be a main lobbying force behind the US proposals in the GATS negotiations and has co-hosted the Forum on Trade in Higher Education Services in May 2002.

CONCLUSIONS

The overview of trends and models in international quality assurance and accreditation in higher education had not the intention to propose a single solution or to suggest a one-way development from the first to the last model. There are interesting trends, promising evolutions and good practices in each of the models presented. In particular, from the perspective of an international quality assurance and accreditation environment that would be capable to have a regulatory impact on trade in higher education services, some developments deserve special attention and might be stimulated further. We list them here and formulate them as recommendations to be considered by the international higher education community and relevant stakeholders:

- Stimulate further international and regional networking, exchange and co-operation between national quality assurance and accreditation agencies.

- Foster convergence, comparability and compatibility in national quality assurance and accreditation systems by promoting international composition of peer review panels, international benchmarking of standards and assessment procedures, joint assessment projects, etc.

- Improve the quality assurance by agencies in exporting countries of transnationally delivered higher education by promoting the acceptance of codes of practice – more specifically the UNESCO/Council of Europe Code – for the transnational provision of higher education, including provision via distance education and e-learning, and the "consumption abroad" by foreign students.

- Open national quality assurance and accreditation systems of importing countries to private and foreign providers.

- Adjust quality assurance and accreditation standards, benchmarks and procedures so that they can be made applicable in a fair way to distance education, e-learning and other new delivery modes, partly by eliminating unnecessary references to input- and process-aspects.

- Encourage formal co-operation and mutual recognition of quality assurance and accreditation agencies between exporting and importing countries.

- Identify and make explicit the mutual recognition of quality assurance and accreditation agencies and systems implied in recognition of qualifications, student mobility and credit-transfer arrangements.

- Register mutual recognition agreements dealing with professional recognition of programmes in the framework of free trade agreements.

- Advocate the Washington Accord model for mutual recognition of quality assurance and accreditation systems in other professions.

- Encourage the international quality assurance and accreditation community to further develop its own standards of professional quality on the basis of already existing criteria and to advance their acceptance by the entire profession.

- Introduce a worldwide register of quality assurance and accreditation agencies meeting the quality standards of the profession by a legitimate body that has the support of the higher education community, the quality assurance profession and the general international community.

- Stimulate international university networks and associations as well as international professional associations to further develop their own quality assurance and accreditation schemes.

- Create favourable conditions for the establishment of international quality assurance and accreditation schemes.

- Support platforms and initiatives where international aspects of quality assurance and accreditation can be discussed further.

Thus, a strategy supporting good practices at the various levels of the models distinguished in this paper seems to be the most realistic and promising way to move ahead. In the longer run however, some of the models and strategies may prove to be more successful than others. The development of trade in higher education services in itself will put some pressure on some of the models of quality assurance, for example when national accreditation systems would appear to pose too great a burden on foreign providers or act in a rather protectionist manner. Personally, we expect that the strategies relying exclusively on sovereign national quality assurance and accreditation systems more and more will prove to be unable to address adequately the challenges situated at the international level. Informal exchange and co-operation (model 1) gradually will have to be replaced

by more formal mutual recognition agreements (model 2) and an international system of meta-accreditation (model 3). Networks of quality assurance and accreditation agencies working in comparable and mutually compatible ways and converging in quality assurance concepts and methodologies seem to be the most probable arrangement in the future. Real international or even global accreditors (model 4), for the moment the least developed model, may become much more important in the more distant future. Institutions eager to acquire international accreditation will push the development of this model, but for the moment the national quality assurance and accreditation agencies appear somehow to resist this evolution. In the field of professional recognition and accreditation, less determined by national legislation than academic quality assurance and accreditation, gradual moves ahead in this direction can be expected. In any case, stronger international co-operation in quality assurance and accreditation will be necessary to cope with the regulatory demands produced by the growth of transnational and borderless education and the development of trade in higher education services.

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