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QUALITY ASSURANCE IN HIGHER/POST-SECONDARY EDUCATION FROM JAPAN'S VIEWPOINT

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Quality Assurance in Higher/Post-Secondary Education from Japan's Viewpoint

Abstract

This paper aims to clarify the idea of international quality assurance and accreditation in post-secondary education from Japan's perspective. First, the paper discusses the characteristics of quality assurance systems for post-secondary education in Japan, including the legal framework and current reform plan. Secondly, the paper explains the current quality assurance framework for transnational education: how Japanese government defines the realm for governmental quality assurance and authorisation. Thirdly, the paper discusses Japan's response to the internationalisation of quality assurance and its possible contributions to international quality assurance. Lastly, the paper suggests the possibility of building an international framework for quality assurance through guiding principles for international quality assurance and a global information network among education authorities and quality assurance agencies worldwide.

Introduction

Mass higher/post-secondary education is no longer particular to industrial societies. Relative to other nations, Japan realised mass higher/post-secondary education quite early, in the mid 1970s. Writing on the transition from elite to mass higher education, Trow (1974) assessed the Japanese higher/post-secondary education system as being highly diversified and multi-functional. Table 1 shows the current number of institutions and students of post-secondary education in Japan

Contrary to the experiences of the United States and Europe, the private initiative in the realisation of mass higher and post-secondary education has been very strong in Japan, where a majority of graduates of higher/post-secondary education has always come from private institutions. The idea of the education 'market' itself is commonly recognised in society, although this market is regulated and partly supported by the government.

Table 1. Number of Institutions and Students of Post-Secondary Education in Japan

	Total	National	Local Public	Private
Institutions				
Universities and Colleges[1]	686	99	75	512
Junior Colleges[2]	541	16	50	475
Colleges of Technology[3]	62	54	5	3
Specialised Training Colleges[4]	3,467	100	215	3,152
Students				
Universities and Colleges	2,786,078	621,488	116,706	2,047,884
Junior Colleges	267,114	5,800	18,834	242,480
Colleges of Technology	57,349	50,483	4,635	2,231
Specialised Training Colleges	765,703	12,720	32,283	720,700

Source: Ministry of Education, Culture, Sports, Science and Technology (MEXT). 2002.

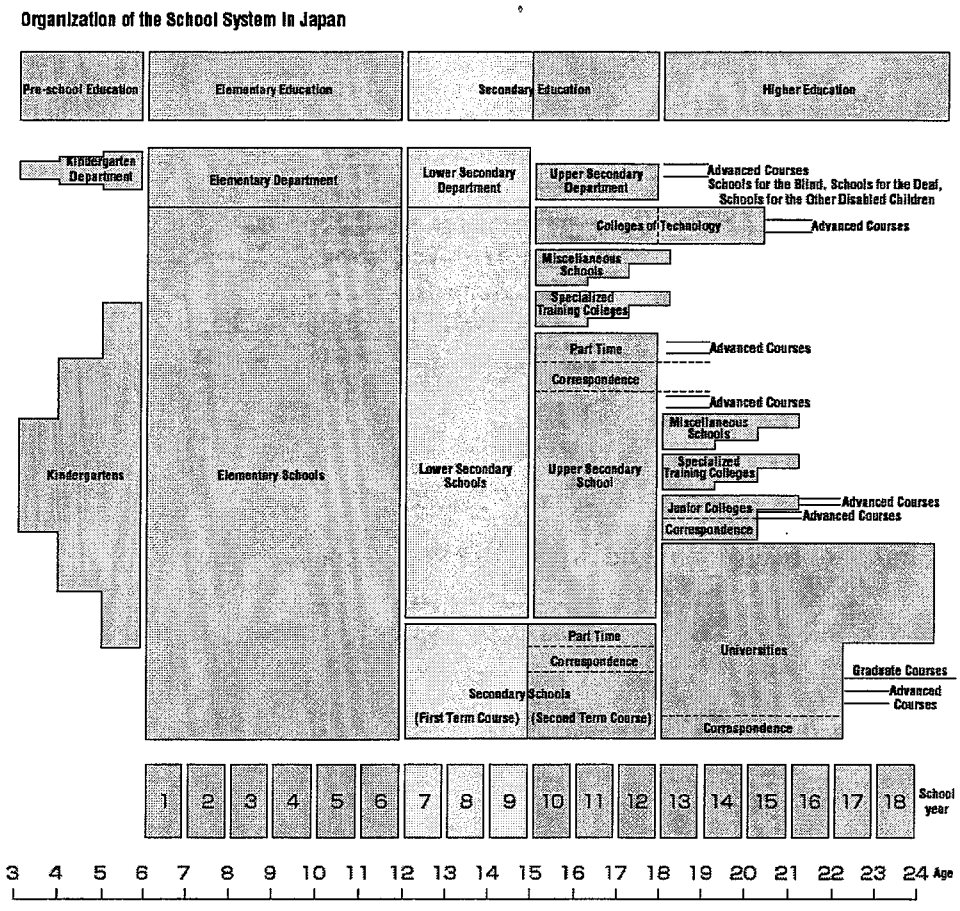
[1] Universities are degree-awarding institutions which provide four year undergraduate and post-graduate programmes.

[2] Junior Colleges provide two year associate degree programmes.

[3] Colleges of Technology provide associate degree programmes of five years (three years of upper secondary education and two years of higher education).

[4] Specialised Training Colleges provide diverse post-secondary education.

Figure 1.School Education System in Japan



Source: Ministry of Education, Culture, Sports, Science and Technology (MEXT) website: (http://www.mext.go.jp/english/org/formal/05a.htm)

The quality of education in Japan has remained a very hot issue since the modern education system was founded in the late 19th century. As Japan experienced a rapid process of catching up with western industrial countries, it has placed great emphasis on systematic endeavours aimed at fostering the development of educated human resources. However, the concept of quality assurance and accreditation is still new even among university academics. Domestic prestige, rather than international reputation, has been important for institutions themselves.

The issue of international recognition of professional qualifications is also receiving increasing attention in some professional fields. The globalisation of the Japanese economy is doubtless contributing to the need for internationally useful qualifications such as the Certified Public Accountant (CPA) of the US. A recent study on the labour market in Japan revealed that experiences abroad are advantageous in advancing individuals' working careers (Matsushige 2002). Engineering and other professional bodies including the Japan Accreditation Board for Engineering Education (JABEE)[5] are making great efforts to provide globally competitive educational programmes and qualifications for students. JABEE is a provisional member of the Washington Accord[6], an international agreement among accreditation bodies of engineering, and is aiming to become a full member subsequent to further consideration and approval by

[5] http://www.jabee.org/english/

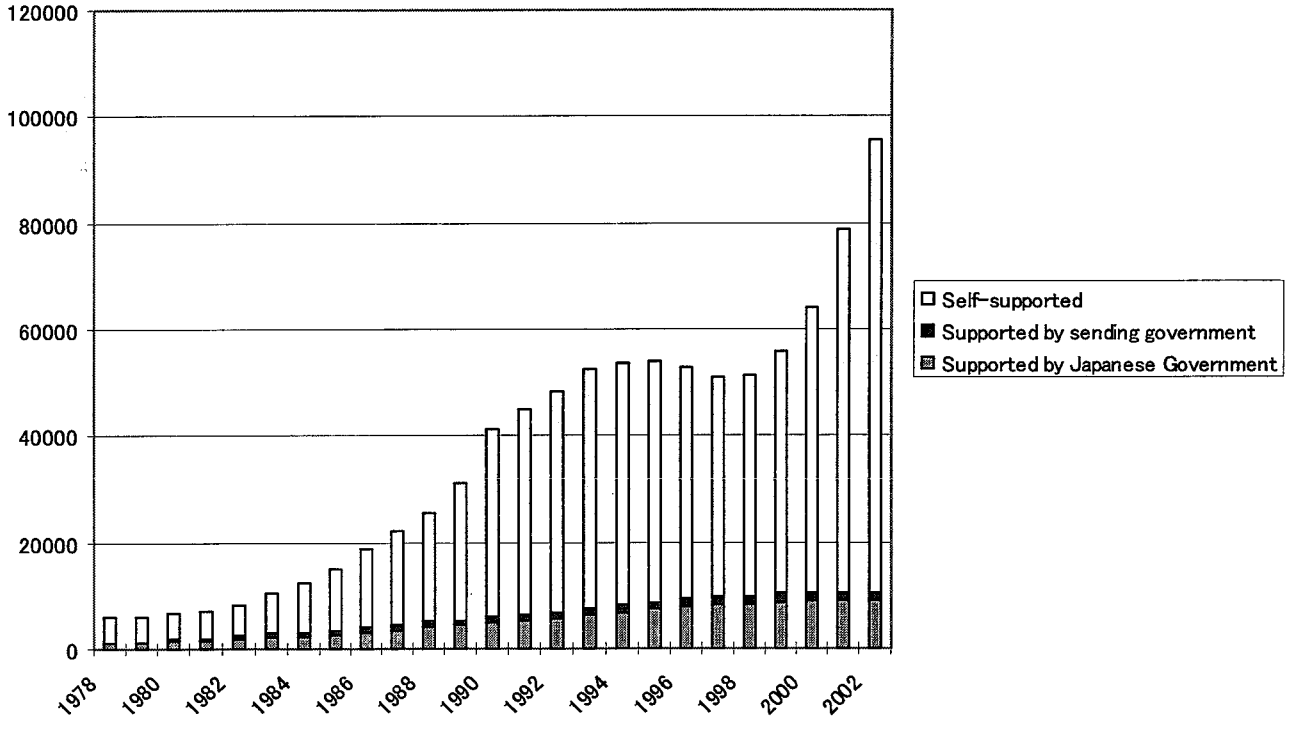
[6] http://www.washingtonaccord.org/default.html

other signatories of the Accord.

The current impact of globalisation is significant in Japan. Japan is one of the biggest senders of students among the OECD countries, mainly to English speaking countries[7] (OECD 2002). Domestically, the number of higher/post-secondary education institutions including public ones with courses taught in English is increasing. As a leading economy in East Asia, Japan is attracting approximately 100,000 overseas students to its higher/post-secondary education institutions (MEXT 2001;Yonezawa 2003). A rapid increase in economic and social exchange with neighbouring countries including China, Korea and South East Asian countries has provided post-secondary education in Japan with an international atmosphere. As is discussed later, the potential impact of offshore and distance education programmes on Japan as both an importer and exporter will also be great.

For these and other reasons, the importance attached to international quality assurance in post-secondary education is becoming ever greater. The Japanese government has been encouraging the internationalisation of Japanese post-secondary education, and trying to assure the quality of formal education provided under the Japan's legal framework, while also allowing various types of for-profit and non-profit provision of non-formal or non-school educational services.

Figure 2. Number of Overseas Students of Higher Education in Japan



Source: Ministry of Education, Culture, Sports, Science and Technology (MEXT)

[7] According to OECD (2002), students from Japan represent 4.6% (second largest after China <7.1%>) of foreign students studying in OECD countries.

Characteristics of Quality Assurance Systems for Higher Education in Japan

Requirements for establishing new educational programmes

Quality assurance for higher/post-secondary education in Japan is based on the School Education Law. Under this legal framework, the government sets the standards for degree programmes provided by universities and associate-degree programmes by junior colleges and colleges of technology.

Responsibility for external quality assurance in higher education lies primarily with the national government, especially the *Ministry of Education, Culture, Sports, Science and Technology* (MEXT) (Yonezawa 2003b). The establishment of local public or private institutions requires authorisation by the Minister of Education, Culture, Sports, Science and Technology. Assessment by the *Council for University Establishment*, an advisory body to the Minister, assures the quality of newly established institutions, while national universities are founded and operated by MEXT itself.

Requirements for the establishment of a new institution are stipulated in a ministerial ordinance called the 'Standards for University Establishment'. These standards are based mainly on input criteria, such as the number and qualifications of teachers, preparation of appropriate educational programs, facilities and equipment. Quality assurance following government authorisation is basically regarded as the responsibility of respective institutions, while inspectors of MEXT monitor their activities.

National universities, which are currently directly operated by, and part of, the national government, will be incorporated in April 2004, acquiring the status of 'national university corporations'. In the future, local public universities may also be incorporated based on each local government's decision. Private higher education institutions are operated by 'school juridical persons' under the Private School Law. A school juridical person is a non-profit entity authorised by the Minister. The property of a private institution belongs to the juridical person.

New system of quality assurance

Deregulation of authorisation

The School Education Law was revised in 2002 based on the recommendation of the Central Council for Education (CCE)[8]. Under this revision, the current authorisation system has been partly deregulated, while a continual third-party evaluation system has been introduced. The revised law provides more flexibility for the reorganisation of faculties and departments. In cases of reorganisation whereby there is no change in the kinds and fields of degrees awarded by the university, only notification and not ministerial authorisation is required.

Introduction of a continual third-party evaluation system

As stated above, the revised law includes not only the partly deregulated system of ministerial authorisation but also the newly introduced system of continual third-party evaluation. Third-party evaluation bodies, independent from both government and institutions, will be recognised by the Minister in accordance with published criteria that covers standards, methods, and organisation for evaluating higher education institutions in continual external quality assurance. When the Minister recognises an evaluation body or withdraws the recognition, the Minister must ask for advice from the CCE. From 2004, universities, junior colleges and colleges of technology will be required to ask an evaluation body to conduct an evaluation once every seven years, with results being reported to each institution and the Minister, as well as made available to the general public.

[8] The Central Council for Education is an advisory body to make recommendations on education policies to the Minister of Education, Culture, Sports, Science and Technology.

The National Institution for Academic Degrees and University Evaluation (NIAD-UE)[9] began a pilot scheme of university evaluation for national and local public institutions in 2000[10]. The Japan University Accreditation Association (JUAA) has engaged in the voluntary accreditation of universities for more than a half century, yet only a third of all Japanese universities are accredited by JUAA (Baba and Hayata, 1997; Yonezawa 2002, 2003b).

The Japanese government will authorise a number of third-party evaluation bodies, likely to include NIAD-UE and JUAA, with the chance these organisations may also receive financial support. Both NIAD-UE and JUAA are members of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), illustrating their active interest in international discussion with its 'Principles of Good Practice' (discussed later).

Japan's Legal Framework and Quality Assurance for Transnational Education

Quality assurance system based on the 'territorial principle'

Education within Japan, including offshore programmes by foreign institutions

The legal framework and quality assurance for transnational education in Japan is based on the principle of 'territorial' jurisdiction. All higher education programmes which are provided in Japan and lead to degrees recognised by the Japanese government are subject to the national quality assurance framework. Except national institutions, recognised institutions of higher education can be established only through the authorisation of the Minister of Education, Culture, Sports, Science and Technology. In other words, the establishment of any private or local public institution is subject to ministerial authorisation. Without this authorisation, while other providers can engage in educational service provision, they are not recognised as higher education institutions.

Offshore education programmes inside Japan by foreign institutions are subject to the same 'territorial principle'. Foreign institutions wishing to be recognised as 'universities' in the Japanese education system need authorisation by the Minister in accordance with the Japanese law just as do Japanese institutions. Some private universities and colleges have been financially supported by overseas donors such as religious associations; other private institutions have non-Japanese presidents. Those universities and colleges of foreign origin are authorised by the Japanese government and recognised as a part of the Japanese higher education system, enjoying the same status as other universities and colleges.

However, the Japanese government is not able to assure the quality of offshore branch programmes by foreign institutions unless they are authorised by the Minister. For example, in the 1980s some American, institutions started their off-shore branch campuses, mostly as for-profit enterprises, without applying for government authorisation and are therefore not officially recognised as a part of the Japanese education system. A few of non-profit enterprises have chosen to operate as specialised training colleges which are non-degree awarding post-secondary institutions in the Japanese system.

Education outside Japan

The Japanese government does not authorise any offshore campuses set up by Japanese institutions of higher education. The degrees offered by those campuses are not recognised as Japanese degrees, but can be recognised as foreign degrees if the concerned foreign authority authorises the campuses as higher education institutions. The idea behind this is that those overseas campuses are regarded as 'foreign'

[9] National Institution for Academic Degrees changed its name to National Institution for Academic Degrees and University Evaluation in 2003.

[10] http://www.niad.ac.jp/english/index.htm

institutions[11]. Based on this 'territorial principle', the Japanese government does not assure the quality of offshore education provision outside Japan.

However, the rapid increase in student exchanges and collaborative education programmes between institutions in Japan and those in other countries implies the necessity for developing international aspects of quality assurance in higher education. Currently, most offshore and quasi-offshore programmes are private institutions. However, the incorporation of national universities in 2004 may stimulate institutions to provide education programmes outside Japan in collaboration with local institutions. Particularly in the field of engineering and the natural sciences, Japanese national universities are highly esteemed and have engaged in various collaborative programmes with institutions in other countries through the framework of Official Development Assistance (ODA)[12]. Some private institutions already intend to develop overseas programmes as part of their institutional strategy. On the demand side, some countries such as Malaysia and Thailand have expressed an interest in inviting Japanese institutions of higher/post-secondary education.

Respect for other countries' education systems in recognising qualifications

The Japanese government aims to respect other countries' formal education systems. Accordingly, any person who has completed twelve-years of formal education outside Japan is legally recognised as qualified to apply for higher/post-secondary education in Japan. Similarly, any person who has completed sixteen years of formal education in another country is legally recognised as qualified to apply for post-graduate education[13]. Of course, final decisions of admission are up to the academic judgement of each respective institution. In addition to legal recognition, each university can recognise, through autonomous discretion, those applicants without sixteen years of education as qualified for postgraduate courses, although such recognition remains exceptional.

Japan's Responses to the Internationalisation of Quality Assurance

In the global higher/post-secondary education market, Japan is an interesting case which has characteristics of both exporter and importer of educational services across national borders. The important role played by private institutions and the planned incorporation of national universities from 2004[14] will provide quality assurance with complex characteristics different from those in Western Europe and North America. The introduction of a new system of third-party evaluations in Japan is expected to contribute not only to national but also international quality assurance of Japanese higher education.

In East Asian countries, Japan and Singapore are regarded as active participants in the discussion of

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[11] For example, the Teikyo Group (private) (http://www.teikyo-u.ac.jp/indexe.htm) listed Teikyo Loretto Heights University (Colorado) as a member institution. While it is not authorised by the Japanese government, it is accredited in the United States by the Accrediting Council for Independent Colleges and Schools (ACICS).

[12] For example, the University of Tokyo and Chulalongkorn University in Thailand are collaborating in the Thailand-Japan Technology Transfer Project, supported by the Japan Bank for International Cooperation (http://www.tjttp.or.th/). Furthermore, Politeknik Elektronika Negeri Surabaya in Indonesia was founded based on financial support from the Japanese government. Many Japanese academics have been involved in the project of this Indonesian institution through aid programmes of the Japan International Cooperation Agency (JICA) (http://www.geocities.com/CapeCanaveral/Lab/1986/).

[13] The Ministerial Ordinance To Implement the School Education Law

[14] Incorporation of national universities is a process to strengthen the institutional autonomy of university management, whereby each national university will be operated by a national university corporation. National universities will be given their own property, and will be operated under a mid-term plan. For specific details on the incorporation plan, see: *Study Team Concerning the Transformation of National Universities into Independent Administrative Corporations* (2002)

trade in education services (Kim 2002). On 15 March 2002, the Japanese government submitted a negotiating proposal on education services to the World Trade Organisation (WTO), which emphasised the importance of liberalisation and quality assurance to protect consumers/learners from low quality services. Japan further proposed the construction of an information network on higher education which could be supplied across national borders. From Japan's viewpoint, the promotion of trade liberalisation and the assurance of educational quality should go hand in hand in the educational services sector.

In January 2003, MEXT initiated a study to examine possible options for international quality assurance, and aims to publish a final report by the end of March 2004. The issues to be covered in the study are: (1) quality assurance for transnational provision of higher education; (2) quality assurance for e-learning in higher education; (3) the construction of an international network for quality assurance; (4) the international validity and transferability of degrees, diplomas and credits, and (5) national systems of quality assurance in harmony with international trends.

Quality assurance for transnational education

Offshore programmes by Japanese institutions

There are a number of Japanese higher education institutions that wish to set up overseas branches to provide educational services as well as coordinate research cooperation. It is arguable that the government should support these trials to provide quality educational services across national borders. Should the Japanese government authorise offshore programmes by Japanese institutions, the quality assurance of those programmes will be an essential issue. New types of international cooperation can also be envisaged. For example, the government of Malaysia is now planning to establish a new university for engineering and management in Malaysia, with joint quality assurance as a key component of the plan with the assistance of the Japanese government. The Thai government has also proposed offshore branches of Japanese institutions to the Japanese government.

Offshore programmes by foreign institutions in Japan

Japan has a long history of welcoming foreign invested institutions, with some older private institutions having been founded by Christian or other foreign groups. Those private institutions of foreign origin have received subsidies from the Japanese government as other Japanese institutions have, while some of these have also received financial support from those foreign groups. In the 1980s, many American universities started their offshore programmes. As previously mentioned, however, these cases have been outside the scope of quality assurance as they have chosen not to apply for governmental authorisation and have therefore been operating outside the Japanese legal framework for higher education.

From the viewpoint of consumer protection, a more pro-active policy of quality assurance as an importing country may be needed. MEXT may begin considering policy options to seek a positive solution for assuring the quality of offshore education programmes by foreign institutions for the benefit of students and other stakeholders. In so doing, other countries' policies and experiences should be considered, including double accreditation by both sending and hosting countries, which is seen, for example, in the cases of Malaysia and Australia's policies on offshore programmes by foreign institutions.

Counter-measures against 'degree-mills'

Issues of international quality assurance are closely linked with possible further growth of degree-mills across national borders. It is often difficult to confirm the accreditation status of foreign institutions and the validity of the degrees and diplomas they issue. The Japanese government's position on this problem is that governments and quality assurance agencies worldwide should co-operate mutually in order to protect students from degree-mills and education programmes of low quality.

Contributions to building an international framework for quality assurance

In order to assure quality post-secondary/higher education for students worldwide, quality assurance agencies and national governments must co-operate together as an international network. This OECD project should be a good arena for improving mutual understanding among diverse education systems with different social contexts. It is also important to receive input from non-member countries. Developing countries tend to be importing countries in trade in education services. Collaborations among OECD, UNESCO and other organisations should be developed.

In Japan, it is generally believed that the internationalisation of higher/post-secondary education can contribute to improving the quality of higher/post-secondary education in Japan and around the world. Further initiatives should be taken by the Japanese government in cooperation with other countries. This idea is reflected in Japan's proposal to the WTO for enhanced international collaboration for quality assurance.

In addition to governmental efforts, quality assurance agencies worldwide have also been actively collaborating to assure the quality and standard of higher/post-secondary education. Japan's evaluation bodies have been trying to be actively involved in these efforts. The NIAD-UE places great importance on international standards in the process of evaluating research and education. The JUAA is actively working on international networking through the activities of the INQAAHE. The JUAA organised an international conference for quality assurance and published the 'Tokyo Declaration' on the quality assurance of internationally viable higher education[15]. JABEE sets clear standards to assure the quality of Japanese engineers to enabling them to work globally.

Building an International Framework for Quality Assurance

In recent years, not only UNESCO but also INQAAHE and other educational bodies have been discussing the issue of a possible international framework for quality assurance in higher education. In April 2003, the general INQAAHE conference adopted 'Principles of Good Practice' for external quality assurance agencies, while the idea of a Worldwide Quality Register or Quality Label was generally regarded as premature if not unrealistic.

It is obvious that an international framework for the quality assurance of higher/post-secondary education has become necessary. Important questions remain as to the form this should take, how and by whom it should be built, and to what extent such a framework should become normative. These questions need to be carefully discussed based on mutual respect between and among different education systems. Mechanisms for quality assurance vary from country to country, and include systems for governmental 'approval' or 'authorisation' of the establishment and/or operation of educational institutions and/or their programmes as well as for governmental or independent 'review', 'evaluation' and/or 'accreditation' of institutions and/or programmes. Such terms as 'accreditation' and 'approval' can have different meanings and implications in different systems of education.

Keeping in mind the diversity of education systems and the necessity of mutual respect between the systems, efforts at building an international framework for quality assurance should include the following two initiatives:

- To develop 'guiding principles for international quality assurance', including not only regional but also global coverage. These principles should include 'partnership', 'mutual respect', the receiving nation's authority and sending nation's responsibility for 'transnational provision', which is, in many cases, trans-regional as well (Please see Annex I); and

[15] http://www.juaa.or.jp/news/declaration_eng.html

- To build a 'global information network' among education authorities and quality assurance agencies worldwide in order to provide information including lists of bona fide institutions of higher education approved and/or accredited by authorities in each country (Please see Annex II).

Even in trade negotiations under the WTO/GATS framework, high priority should be given to quality assurance, especially for the purpose of protecting students as consumers and other stakeholders of education services including employers, industry and civil society. Detailed and sophisticated aspects of quality assurance should be discussed at more education-oriented forums such as UNESCO. While WTO cannot be in charge of international quality assurance in higher/post-secondary education, perhaps UNESCO can.

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ANNEX I

A Tentative Proposal of 'Guiding Principles' for International Quality Assurance

Part I: Quality and Internationalisation

- What matters is the 'quality' of higher education, whether 'public' or 'private'.
- Internationalisation of higher education should contribute to the quality of education in the world including both developing and developed countries.
- Quality assurance encourages international collaboration, transnational provision, and mobility of people in higher education.

Part II: Mutual Respect and Partnership

- There should be a principle of 'mutual respect' between the diverse systems of higher education in the world with their diverse mechanisms for quality assurance.
- The national systems of higher education should help one another to improve their quality assurance mechanisms, and cooperate with one another to disseminate good practices.

Part III: Transnational Provision

- The education authorities and quality assurance agencies of both sending and receiving nations should take responsibilities respectively for assuring the quality of transnational provision of higher education.

ANNEX II

A Tentative Proposal of a 'Global Information Network' for Quality Assurance

Organisations to participate in the network

- National education authorities
- Quality assurance agencies
- Relevant regional organisations
- UNESCO and other relevant international organisations
- Relevant NGOs such as INQAAHE
- Others

Information to be provided

- Outline of higher education system
- Framework of degrees and other qualifications in higher education
- Quality assurance and accreditation system
- Lists of bona fide institutions of higher education approved and/or accredited by authorities in each country

Note: Particularly developed and exporting countries are expected to contribute to the initiative of building this kind of 'global information network'.

OECD CERI

OECD Secretariat

ENHANCING CONSUMER PROTECTION IN CROSS-BORDER HIGHER EDUCATION: KEY ISSUES RELATED TO QUALITY ASSURANCE, ACCREDITATION AND RECOGNITION OF QUALIFICATIONS

OECD/Norway Forum on
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This document provides a summary of the progress on OECD/CERI work on mapping trends in international quality assurance, accreditation and recognition of qualifications. In particular, it describes the work on developing guidelines on consumer protection in cross-border higher education. Countries have recently agreed that the OECD, in co-operation with the UNESCO, would work to develop this non-binding instrument. The attached paper was prepared as an outcome of the OECD/CERI Experts' meetings and presents a catalogue of preliminary ideas to the types of initiatives which might be taken by key stake-holders.

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Enhancing Consumer Protection in Cross-Border Higher Education Activities

The purpose of this paper is to provide a summary of the ongoing OECD work on mapping international quality assurance, accreditation and recognition of qualifications and in particular, of a OECD/UNESCO co-operation on enhancing consumer protection in cross-border higher education.

1. Introduction

The internationalisation of higher education systems increases the possibilities for improving the skills of individual students and to increase the quality of the national higher education systems. Cross-border education activities through student, programme or institution/provider mobility have therefore grown considerably over the last decades, following a collaborative effort of national and international policies encouraging such activities and a high demand by students to study abroad.

In addition to the traditional form of cross-border education - students travelling abroad to study - new developments in cross-border education, such as the emergence of e-learning, for-profit providers, joint campuses, branch campuses, transnational consortia, are increasing. These new developments are challenging existing national quality assurance and accreditation frameworks and agencies, thus increasing the pressure to make new efforts for consumer protection both at national as well as international levels. At the same time, increasing student and professional mobility across borders has put the issue of mutual recognition of academic and professional qualifications higher up on the agenda.

2. Ongoing work on "International quality assurance, accreditation and recognition of qualifications"

The Centre for Educational Research and Innovation at the OECD has conducted a comprehensive study of existing frameworks and trends in international quality assurance and accreditation in post-secondary education and recognition of qualifications. For this purpose, CERI convened meetings of experts[1] on "International quality assurance, accreditation and recognition of qualifications in post-secondary education".

A key conclusion from the meeting of the experts is that existing national frameworks of quality assurance, accreditation and recognition of qualifications in higher education are, in many cases, as yet insufficiently geared towards addressing cross-border and private provision. Consequently, the growing cross-border and private provision of post-secondary education is increasing the risks that learners are victims of rogue providers (degree mills), offering low quality educational experiences and qualifications of limited validity. The existence of degree mills can also have repercussions for the reputation of well-established

[1] Carolyn Campbell, Quality Assurance Agency for Higher Education, UK; Judith Eaton, Council for Higher Education Accreditation, US; Eric Froment, European University Association; Matthew James, Australian Permanent Delegation to the OECD; Tsutomu Kimura, National Institution for Academic Degrees, Japan; Jane Knight, Ontario Institute for Studies in Education, Canada; Richard Lewis, Centre for Higher Education Research and Information, UK; Mark Protherough, Association of Chartered Certified Accountants; Sverre Rustad, Ministry of Education and Research, Norway; Yasuyuki Shimotsuma, Permanent Delegation of Japan to the OECD; Andree Sursock, European University Association; Christian Thune, The Danish Evaluation Institute; Stamenka Uvalic-Trumbic, UNESCO; Dirk Van Damme, Flemish Interuniversity Council, Belgium; Peter Van Der Hijden, European Commission.

national higher education systems. Additionally, in the context of an increasingly internationalised job market, employers need to have reliable information on the value of particular higher education degrees.

The attached document, as an outcome of the experts' meeting, presents preliminary consideration by the experts to the types of initiatives which might be taken by key stake-holders – institutions, quality assurance and accreditation agencies, and governments – to address these issues and to enhance consumer protection in cross-border education.

A number of other documents[2] from the Experts' meetings are also available at the web-page for the OECD/Norway Forum[3], including a series of reports on how national and regional quality assurance and accreditation agencies in Australia, Canada, Europe, Japan, and the United States, as well as non-OECD countries are dealing with cross-border quality assurance, accreditation and recognition issues.

In addition, the documents illustrate the existing international frameworks on recognition of qualifications (UNESCO regional conventions) and the Action Plan adopted by the UNESCO Global Forum on International Quality Assurance, Accreditation and the Recognition of Qualifications as well as many other initiatives strengthening the international cooperation in these areas, as for example international networks of national quality assurance and accreditation agencies and networks of universities across borders. Launched in October 2002, the UNESCO Global Forum on International Quality Assurance, Accreditation and the Recognition of Quality Assurance in Higher Education brought together different stakeholders in higher education from Africa, the Arab States, Asia and the Pacific, Europe and North America, Latin America and the Caribbean as well as the Mediterranean and used the mechanisms linked to the UNESCO regional conventions on the recognition of qualifications. Recognising that the existing international frameworks need to be reinforced, it has recommended in its Action Plan that the Regional Conventions on the Recognition of Qualifications (in Africa, the Arab States, Asia and the Pacific, Europe, Latin America and the Caribbean and the Mediterranean) respond to the challenges of cross-border higher education provision, including consumer protection.

Finally, there is a report that analyses the impact of a range of trade agreements on recognition of professional qualifications. The paper begins by looking at the World Trade Organisation General Agreement on Trade in Services (GATS), a multilateral framework that sets out rules for the conduct of international trade in services, including education services. The GATS includes both general rules—for example, related to transparency of trade-related regulations—and a framework for specific commitments under which countries choose whether, and under what conditions, to allow access to their markets for foreign suppliers. The paper examines both the provisions in the GATS directly related to recognition, and the possible impact of other provisions in the agreement on the recognition of professional qualifications. The paper also examines to what extent progress has been made in concluding mutual recognition agreements pursuant to a range of regional trade agreements.

3. OECD/UNESCO cooperation to enhance consumer protection in cross-border higher education

However, there is a broad understanding that the existing initiatives on international quality assurance, accreditation and recognition of qualifications have to be further strengthened and implemented. Indeed, in the context of increasing and new forms of cross-border provision of higher education, and in order to complement efforts developed at the national and regional level, there is a need for new international

[2] The documents are a brief history of national and international quality assurance systems; country/regional reports from Australia, Canada, Europe, Japan, the US and non-OECD countries; report on UNESCO's Conventions on the Recognition of Qualifications: Regional Frameworks; and on the Trade Agreements and Recognition.

[3] http://www.flyspesialisten.no/vfs_trd/ufd/

initiatives to enhance consumer protection at a global level, while respecting individual countries' authority to regulate the quality assurance and accreditation of their own higher education system. Such an initiative would most appropriately be pursued by the education sector itself, via international educational guidelines. The effort needs to be a collaborative one involving both sending and receiving countries of education services and it needs to have global range.

Countries have thus, recently agree that the OECD, in close collaboration with the UNESCO, develops guidelines in order to strengthen the consumer protection in cross-border higher education. The OECD guidelines on enhancing consumer protection would be a non-binding instrument for OECD members that will list suggested actions by the governments, higher education providers, as well as quality assurance and accreditation agencies that would be based on the assumption that countries prefer to have national authority over quality assurance and accreditation issues in their own higher education system. The guidelines would thus be based on mutual trust and respect between the diverse stakeholders involved in national quality assurance and accreditation across countries. The guidelines would also, in particular, take into account the needs of developing countries. The main objective is to promote the design of quality assurance and accreditation mechanisms at the national level that ensure consumer protection in the context of internationalisation- for students, both in terms of protection from degree mills and fair recognition of foreign degrees, and for employers, as further consumers of the qualifications.

The 32nd session of the General Conference of the UNESCO invited its Director General to "develop practices and principles to guide cross-border provision of education, drawing on the competence of the UNESCO and other international agencies, in co-operation with quality assurance agencies and educational providers"(Resolution DR C/COM.II/DR.1—Higher Education and Globalisation: Assuring Quality of Global Higher Education and Promoting Access to the Knowledge Society as a Means for Sustainable Development).

The guidelines would be drafted by experts from OECD Member countries as well as UNESCO Member States following the invitation recently made by the 32nd session of the UNESCO General Conference to other inter-governmental organisations to cooperate with the UNESCO in attainment of these objectives. The experts will include representatives of the different stakeholders - education policy makers, quality assurance and accreditation agencies, professional associations, public and private providers, and students. The attached paper on ways of enhancing consumer protection in cross-border education provides a catalogue of ideas which could usefully be drawn upon in the development of the guidelines. The drafting of the guidelines would need to be carefully co-ordinated, taking into account all national and international initiatives in the field, including ongoing activities of the Action Plan of the UNESCO Global Forum on International Quality Assurance, Accreditation and the Recognition of Qualifications.

Outcome of OECD/CERI experts' group meetings

Enhancing Consumer Protection in Cross-border Higher Education: Key Issues related to Quality Assurance, Accreditation and Recognition of Qualifications

1. INTRODUCTION

1.1. Changes and Challenges

At the beginning of the 21st century, the worlds of education and learning are changing rapidly. Higher education in a more globalised world brings new realities and challenges. The knowledge economy/society, innovations in ICTs, emphasis on market economy and trade liberalisation have important implications for higher education and lifelong learning. Massification of education provision and participation continues to challenge existing institutions, policies, funding arrangements and regulatory frameworks in many countries. New opportunities and possibilities such as electronic and virtual delivery of educational services, cross-border delivery and consumption of educational services, skills development outside formal learning arrangements, new types of qualifications, and even commercial provision of teaching and learning challenge and stimulate the reform of existing educational values. These developments also pose new questions for the regulatory capacities and boundaries of existing national or regional policy frameworks. Furthermore, new rules in other sectors, such as those related to trade in educational services in the General Agreement on Trade in Services (GATS), are seen by many stakeholders in education as only partially helpful or even harmful.

This paper focuses on the issues and challenges associated with the growth and diversity of cross-border education provision as a response to the increasing demand for higher and lifelong education. Key issues are discussed in terms of how institutions, agencies and policy makers in the fields of quality assurance, accreditation and recognition of qualifications can enhance protection for consumers of higher education. A broad interpretation of the term consumer is used in the paper. While students are at the centre of the discussion, other consumers such as employers and the education community itself, as well as the general public are included as important players and stakeholders.

1.2. New Opportunities and Potential Risks

The changes outlined above challenge existing policy frameworks and their consequences may be perceived by many as threatening, but it is very important to also see the new potential opportunities and benefits lying behind them. Under the right conditions, cross-border provision, commercial education services and non-traditional delivery modes can open up learning opportunities and enlarge educational participation. In the global growth of knowledge-based economies, higher qualifications can improve the opportunities of individuals and the prosperity of communities and nations. The movement of skilled labour across national borders and new competencies produced by student mobility and internationally oriented qualifications can produce huge benefits for the internationalising professional labour market. Cross-border education and the diversification of teaching and learning modes may contribute to the improvement and innovations in tertiary education systems. Commercial provision of educational services in itself creates new economic activity as well. These economic opportunities and benefits are testimony to the growing economic importance of tertiary education in the global knowledge society and can provide added value to the more familiar but still relevant advantages of academic cooperation, intercultural exchange and international understanding. New policy frameworks should try to create conditions under which these potential benefits can be maximised and the risks minimised.

Of course, risks do exist. The national and regional case studies of quality assurance, accreditation and recognition of qualifications and other recent expert papers point to a number of risks associated with cross-border educational delivery and commercial provision:

- National systems for the recognition of qualifications may have limited experience to deal with commercial and cross-border providers so that graduates of those institutions and programmes – even when they are of good quality – are faced with qualifications of limited validity and usefulness.

- The increasing need to get national recognition of foreign or private qualifications may put a great pressure on the existing systems leading to unnecessary bureaucratic problems and personal difficulties for the individuals and families concerned.

- The high probability that cross-border and commercial provision is not being covered by national systems for approval, quality assurance, accreditation and recognition of qualifications may increase the risk that learners are victim of rogue providers ('degree mills'), offering low quality educational experiences and qualifications of limited validity.

- An additional 'second order' risk is the emergence of non-trustworthy accreditation systems ('accreditation mills'), which can provide misleading approval to educational providers, students, employers and the public.

- The professions and the skilled segments of the economy largely depend on trustworthy and high quality qualifications. Consumers of professional services want to have full confidence in the knowledge and skills of qualified professionals. Increasing opportunities to earn low-quality credentials in the long run may affect the trust put in professional qualifications and in the quality of professional labour as such.

- As education is still largely a cultural process embedded in diverse national, ethnic, religious, linguistic settings, there are risks that cross-border provision does not acknowledge and respect cultural sensitivities.

- Finally, the growing divide between the new realities and the scope of existing national policies and frameworks, may lead to the growing importance of other regulatory systems that are outside the educational system. Some trade agreements and ISO standards for industry are seen by many in education as examples of this. Another trend is the assessment of skills and competencies by professions and employers.

1.3. Policy Objectives

This review of new opportunities and potential risks often associated with cross-border and commercial delivery of education services raises a number of policy objectives:

- Learners need to be protected from the risks of misinformation, low-quality provision and qualifications of limited validity. Although some students object to being identified as 'customers', the term *'consumer protection'* can be used as an appropriate label for this policy objective. Strong approval, quality assurance and accreditation systems which extend their coverage to cross-border and commercial provision and non-traditional delivery modes, should guarantee that learners are safeguarded from rogue providers and are acquiring qualifications that are meaningful and valid.

- In an increasingly international professional labour market, qualifications should be recognised internationally with as few difficulties as possible. Given the national and cultural embedding of education, national control over qualifications will remain necessary, making systems of recognition of foreign qualifications indispensable. Recognition procedures should be transparent, coherent, fair and reliable and impose as little burden as possible to mobile professionals.

- Qualifications should be readable and transparent in order to increase their international validity and portability and to ease the work of recognition arrangements and credential evaluators. Reliable and user-friendly information sources on national education systems and qualification frameworks should enhance the transparency of qualifications and inform their holders of their academic and professional validity in the various national systems.

- National quality assurance and accreditation agencies need to intensify their international cooperation in order to increase their mutual understanding. By developing principles of good practice and their own standards of professional quality, agencies should guarantee that they themselves are trustworthy, that rogue accreditors can be identified and that in doing so, an international network of quality assurance can be constructed to safeguard academic standards of provision and qualifications.

Of course, all this is not new and during the past decades, several measures, policies and regulatory frameworks have been developed to cope with these issues and policy objectives. Most of these measures have been taken at the national level, but also at the international level, principles have been adopted and binding conventions have been approved. In some areas, the legal and administrative frameworks are largely in place; in other fields, more action is needed to realise the above mentioned objectives.

1.4. Policy Constraints

In any case, future policies and actions will have to take into account some constraints, including the following:

- Most countries, if not all, attach a high importance to the national sovereignty over education. Education is strongly linked to national history, linguistic identity, cultural specificities, national economic development and social cohesion, and is therefore seen as a field of national policy-making. International policies will thus have to be based on international consensus among sovereign states.

- Policy-making and regulation in education in most countries are largely the responsibility of national and regional governments and the systems vary from country to country. Institutional autonomy, decentralisation, deregulation, and the increasing involvement of external stakeholders are features of contemporary changes in policy environments in many countries. But seldom do these trends affect the governmental authority over education in a fundamental way. The impact of globalisation on tertiary education is stimulating many governments to seek international debate and cooperation to converge their own policies with international trends and thus to increase the regulative capacity of their own policies.

- This being said, it is also important to acknowledge the role of non-governmental organisations (NGOs) at the international level. These NGOs include university associations, institutional networks, students' organisations, professional associations, and networks of quality assurance and recognition agencies. These groups not only act as representative

bodies of their constituencies, but also provide valuable professional expertise and knowledge that can support policy-making processes and therefore have an important role in policy development.

- Because of national sovereignty, cultural diversity and the prevalence of governmental authority, international regulation in education has to be based on cooperation and confidence-building initiatives. Standard-setting regulations are an important policy instrument, as is shown by the UNESCO conventions on the recognition of qualifications. Normative standard-setting in quality assurance of higher education by external bodies to which national governments or agencies have to comply is not a realistic policy option. Non-binding guidelines for policy development, principles of good practice and policy benchmarking, based on trust and free commitment of all stakeholders involved, are far more realistic options for international policy development. These approaches can be supported by information networks and databases, hosted by respected and recognised bodies acting as clearing-houses.

The next sections of the paper address issues and trends and introduce some existing initiatives related to quality assurance, accreditation and recognition of qualifications that could facilitate achieving the policy objectives listed above, while taking into account the policy constraints. Given that the focus of this paper is on enhancing consumer protection these sections are oriented to 1) institutions and programmes, 2) quality assurance and accreditation agencies and 3) actions and issues related to the recognition of qualifications.

2. INSTITUTIONS AND PROGRAMMES

2.1. Approval and licensure of institutions and programmes

The national and regional case studies show that systems for the approval, registration, accreditation, authorisation or licensure – the terms vary and have divergent meanings in different national systems – of institutions and/or programmes are in place in many countries. In most cases, the national or sub-national authority grants approval to institutions or programmes, thus authorising them to operate within their territorial jurisdiction and to award qualifications that are recognised by the national or sub-national authority. These arrangements are often based on a priori decisions, allowing operation under a certain number of conditions. The case studies show that very different systems exist regarding the approval, authorisation or licensure of private, non-public, non-national or for-profit providers. In many countries the system is state-controlled, leading to a legally defined list of 'publicly recognised' institutions. In such systems, access by private or foreign institutions to the system can be difficult. In other systems, such as the US, opportunities to operate non-profit and for-profit private institutions have been in place for a long time.

It can be argued that it is in the national educational interest to establish systems of registration, licensure or accreditation of such educational providers, even if a country is not inclined to recognise their qualifications or to provide public resources. Registration can be a base-line requirement, and provide no other rights regarding recognition of qualifications or access to public subsidies. Providers wishing to be registered as educational entities in a country where they are active should have the opportunity to do so and should be treated in a fair manner without being subjected to unnecessary administrative or financial burdens.

At the moment, there is no authoritative list of institutions/providers at the international level that in one way or another have been accredited by competent authorities to operate in their territory. Such a listing

would be a useful resource and consumer protection tool for education actors, stakeholders and consumers including students, credential evaluators, employers, professional bodies, educational institutions and the general public. The need to list 'bona fide' institutions has increased due to the emergence of less trustworthy, fraudulent and corrupt providers of educational services.

The establishment of an international database based on a clear set of definitions and a typology of regulatory systems, listing all institutions that are recognised, registered, authorised, licensed, accredited, etc. to operate within each country would be useful step forward. On a voluntary basis, each country could provide a list of 'bona fide' institutions, according to their national arrangements and criteria. The list would not aim to establish general international criteria; each country would provide information about which institutions are on the list and on what basis accreditation is granted under its system. In order to ensure that the database gets a high level of trust and an authoritative status, it is very important that the database is implemented and run by an international organisation with a high integrity and which is well known. UNESCO is well placed to collect these data from governments of member countries and make them publicly accessible and available.

2.2. *The commitment of institutions to deliver quality service and to award recognised qualifications*

Any system of quality control or consumer protection in tertiary education will fall short if it is not backed up by the commitment of institutions to deliver educational services of the highest quality possible within the given context. Approaches and definitions of quality may differ among institutions and between contexts, but the institutional responsibility towards quality in itself is fundamental. While external quality assurance and accreditation will be an important feature of international and national regulation, the institutions' public responsibility, accountability and internalised 'quality culture' will always need to be the basis of any effective system of quality control. The rationales, motives and sanctions for quality or quality deficit may differ between public and for-profit institutions. However, both types of institutions should demonstrate an institutional commitment to quality and develop effective internal quality management systems, delivering educational services up to the standards that consumers including students, employers, the general public and society at large expect.

Sector organisations and inter-institutional networks play a critical role in fostering their member's commitment to quality as part of the self-regulatory capacity of their sector. It is important for new cross-border commercial providers and for-profit institutions to be part of and/or develop organisations and self-regulatory incentives at the sector level.

Codes of good practice for the delivery of education across national borders are being developed by individual and groups of countries. One example is the UNESCO-CEPES/Council of Europe 'Code of good practice in the provision of transnational education' which was adopted in 2001 by the Lisbon Recognition Convention Committee. It includes a number of principles regarding transnational education provision, where the learner is situated in a different country than the provider issuing the award. The principles are sound and serve as good examples for institutions that provide this type of cross-border education.

Of particular interest to students is whether the qualifications delivered by institutions are recognised or have validity in the outside world. There are several gradations of academic and professional, 'de jure' and 'de facto' recognition of qualifications. It is an important element of consumer protection and an institution's commitment to quality to give full transparency on the level and extent of validity and recognition of any of its qualifications.

In some countries, institutional awareness of the issues and systems of recognition of foreign qualifications is generally low. National information and credential evaluation systems are less effective, if they are not backed up by institutions that deliver qualifications which gain the widest recognition possible. There are also cases where institutions, especially in the private, commercial, cross-border fields of educational activity, give little or even misleading information on the scale to which its qualifications are recognised. It can be argued that it is part of the institution's obligation to quality assurance to guarantee that its qualifications have the widest validity possible and to inform the students as completely as possible on the status of recognition of its qualifications. These are important elements of consumer protection.

2.3. External quality assurance and accreditation of institutions and programmes

During the last quarter of a century, external quality assurance and accreditation systems have been established in all regions of the world. The national and regional case studies show that almost every OECD country now has arrangements for the external evaluation of institutions and/or programmes, sometimes leading to formal accreditation or recognition systems which give approval to institutions or programmes to operate on the basis of quality assessments. A more recent trend demonstrates that the field of quality assurance itself is being liberalised, allowing several quality assessment agencies to enter the system, as the examples of Japan and Germany illustrate. Public regulation in these cases, involves procedures for the 'recognition' of quality assurance or accreditation agencies. In many countries, the government has a very strong position in the field of quality assurance, either by directly establishing agencies and arrangements or in a more indirect way by being the main source of legitimacy of quality assurance and accreditation agencies. In other countries, such as the US, the accreditation system is, in principle, voluntary and organised outside the state purview, but with strong links to the public regulatory system and in a partnership with state and federal governments. It is desirable that each country establishes a comprehensive system of quality assurance in tertiary education at the national level.

Thus, external quality assurance and accreditation arrangements now have become full features of modern regulation systems in higher education. Besides the national state, also inter-institutional networks and associations, professional bodies and specialised agencies have been active in establishing external quality assurance and accreditation systems. A system of 'multiple accreditation', where there are several accreditation procedures for different purposes that some experts see as the probable and desirable outcome of development, has become reality in only a limited number of countries, but elements of it are expanding at a rapid pace.

The movement of students, programs and providers across national borders and the emergence of new delivery modes such as distance education and e-learning pose specific challenges for quality assurance and accreditation procedures. The quality assurance and accreditation arrangements are commonly restricted to the state recognised (functionally) 'public' institutions thereby often leaving private, non-national and for-profit forms of provision not covered by these schemes. The challenge for the current quality assurance and accreditation systems is how these non-national programmes and providers can be covered by enlarging the scope of existing systems, or by establishing specific systems for them.

Regarding external quality assurance and accreditation of cross-border activities and new delivery modes of education, both the arrangements in the sending and in the receiving country have a role to play. There are some very good examples of codes of practice that address this issue especially the UK, US and Australian codes. These codes put emphasis on the role of the quality assurance arrangements of the sending country and try to guarantee that the institution assures the quality of programmes delivered across borders is at the same level as those delivered in the home country. A criticism of this approach is that it has a homogenising impact and thus could contribute to a kind of 'educational imperialism' by not taking into account specific cultural sensitivities and particular needs and possibilities of students in the receiving

countries. The authority of the receiving country over the quality of the education needs to be maintained. The key issue is to promote closer cooperation between quality assurance agencies of both sending and receiving countries. This could involve mixed assessment teams, thereby ensuring that the different perspectives are taken into account or enquiries from receiving countries to sending ones regarding the quality status of transnational providers.

The growth of new delivery and learning modes such as distance education, web-based delivery, e-learning, virtual universities, etc. has raised challenges for conventional educational approaches and practices, and thus also quality assurance and accreditation arrangements. During the last years, several initiatives have been taken to adapt existing quality assurance and accreditation arrangements to new delivery modes or to develop new quality assurance systems. These developments are not only relevant for new delivery modes in particular, but they are also leading to arguments questioning traditional input-oriented approaches to quality assurance in general and placing more attention to outcomes-oriented and competency-based approaches to quality assurance and accreditation. .

The dominant attitude of governments and quality assurance agencies today is that new delivery modes should be quality assured and accredited by the same procedures and agencies as more traditional teaching and learning modes. In 1998, the US Department of Education took the decision that distance education is considered to be included in the scope of existing accreditation agencies.

This inclusive approach seems to be appropriate, given the fact that new delivery modes rarely do exist in their purest form. In most cases mixed delivery modes are practiced. There is no clear divide between old and new delivery modes, but only a continuum with face-to-face, brick-and-mortar type of institutions on the one hand and full 'virtual' universities on the other. Therefore, it is desirable that quality assurance and accreditation arrangements, which are established for more conventional teaching and learning modes, cover also distance education and new delivery modes. Furthermore, it is preferable that existing codes of practice are further elaborated and adopted by providers and quality assurance and accreditation agencies.

Nevertheless, web-based delivery of programmes and qualifications implies a specific challenge regarding the transnational nature of their activities. The Internet has no physical borders and geographical control of electronic communication is very difficult. This means that the 'territorial principle' that governs many of the existing regulation systems, including quality assurance and accreditation arrangements, becomes irrelevant with regards to web-based delivery. Students anywhere in the world can register, follow courses and get qualifications from virtual institutions operating with no fixed place of 'production'.

This makes these kinds of programmes and delivery modes particularly vulnerable to fraudulent activity. In order to avoid the fraudulent activity, two things would be required. First, it is the responsibility of the provider itself to guarantee that these programmes are quality assured by a trustworthy quality assurance or accreditation agency. In order to safeguard the seriousness of their own business, these providers need to be fully aware of, and responsible for, meeting the demand for quality assurance at the highest possible level of scrutiny. The providing institution, wherever its legal or operational base is located, also needs to be completely open and transparent to consumers about the way in which, and by whom, its operations are subject to external quality assurance and accreditation. Secondly, the recognition by any government or professional body of qualifications delivered through virtual provision should be addressed in the review of the programme by a trustworthy external quality assurance and accreditation agency. To assist in this, quality assurance and accreditation standards, criteria and protocols should be adapted to cope with the specific characteristics and demands of electronic delivery and with innovative approaches in general, including by focusing more on outcomes-oriented and competency-based assessment techniques.

3. QUALITY ASSURANCE AND ACCREDITATION AGENCIES

3.1. International cooperation, networking and convergence in quality assurance

It is recognised that quality assurance and accreditation agencies need to have greater capacity to cope with the demands and challenges of increased cross-border mobility of students, programs and providers. A first step is to help these agencies exchange experiences and good practice and contribute to the professional development of their staff members through international cooperation and professional networks. This is happening on an international level through organisations such as the International Network of Quality Assurance Agencies in Higher Education (INQAAAHE) and through the gradual establishment of regional networks.

Recent surveys have shown that while there still is a huge variety in fundamental principles, types of evaluation, focus and scope of evaluation, methodological approaches, etc. there are also processes of coordination at work. Relatively simple measures such as improving the international composition of review teams, exchanging qualified personnel among agencies, engage in cross-border joint assessment projects help to share good practice and promote collaboration.

Among national agencies, there are shared principles and methodological approaches in quality assurance or accreditation. For instance, most quality assurance and accreditation agencies organise their evaluation activities on the basis of the following four principles: 1) they stress the crucial importance of autonomy and independence of quality assessments both from governments and institutions and make use of external experts, 2) they start with the self-evaluation by institutions or programmes, 3) they do an external assessment by a peer-review group and site-visits, and 4) they publish the reports. On this basis, bottom-up consensus building and voluntary acceptance of shared principles could be the best, and seems to be the preferred, way to proceed among national quality assurance and accreditation agencies. Of course, any move towards the development of such shared international principles would be a very sensitive step and would require acknowledgement and respect for differences in contexts, cultures and regulatory systems.

3.2. Recognition, evaluation and registration of agencies

In many countries, procedures exist for the validation or recognition of quality assurance and accreditation agencies by governments or governmental agencies, especially in those systems where the state is not directly involved in the ownership of such agencies. The US Department of Education has established a system of recognition of accreditors whose accredited institutions or programmes seek eligibility for federal student aid funds. In Japan, the deregulation of governmental authorisation of institutions and programmes and the introduction of the 'third party evaluation system' are accompanied by a system of governmental recognition of such evaluation agencies. Similar developments of deregulating the quality assurance and accreditation field and establishing systems of recognition are also observable in other countries.

The quality assurance and accreditation communities have also set up procedures for the recognition of agencies. 'Soft' types of recognition can be identified in the membership criteria applied by professional networks such as the European Network of Quality Assurance Agencies (ENQA). National quality assurance and accreditation agencies more and more engage in forms of mutual recognition. An interesting experiment by the quality assurance network in the Nordic countries showed that mutual recognition involves rather detailed discussion of evaluation protocols, standards and criteria and other methodological issues. Another example is the 'Western Hemisphere Initiative' of the US Accreditation Board for Engineering and Technology (ABET) which is working towards mutual recognition of quality assurance and accreditation in US, Canada and Mexico. As in the domain of recognition of qualifications, it does not

seem to be very fruitful to try to reach consensus on the strict equivalence of evaluation standards and procedures. Instead a more appropriate approach is to build mutual recognition agreements on the basis of confidence in each other's approaches even if they are varying, on condition that differences are not 'substantial'.

Besides mutual recognition, there is also the model of recognition by an umbrella organisation in the quality assurance field. An interesting model is that of the Council for Higher Education Accreditation (CHEA) in the US, in which recognition is given to accrediting organisations on the basis of their evidenced acceptance of a set of recognition standards. An even stronger model is the German one in which quality assurance and accreditation agencies can be set up freely, but have to be recognised by a central body, the 'Akkreditierungsrat', that gives a kind of 'meta-accreditation' on the basis of an assessment whether these agencies meet predefined standards.

There is a growing consensus in the field that also quality assurance and accreditation agencies have to be subject to external evaluation in which their performance is assessed against the agreed standards and principles of professional practice in the field. Still, for many agencies in the field, an international scheme of standards-based external evaluation or 'meta-accreditation' is not yet acceptable. The idea of a Worldwide Quality Register (WQR) proposed by the International Association of University Presidents (IAUP), met resistance among quality assurance and accreditation agencies. The objections include that it would interfere with nationally based legitimacy of agencies, that it is not yet possible to define an universal set of professional quality standards, that it would impose one dominant model upon a still highly diversified field of practice, that the potential negative outcomes are counter-productive in a field still in development -especially in vulnerable tertiary education systems, and that it would involve a big bureaucracy in order to be operational at a global level. These are clearly valid arguments, but they do not disclaim the necessity of external evaluation of quality assurance and accreditation agencies against agreed professional standards and the need for international public reporting on this. Experiments in voluntary standards-based international evaluation and 'meta-accreditation' could indicate whether this would be a fruitful and acceptable scenario for the future.

Unfortunately, the growing international importance of quality assurance and accreditation and the internationalisation of such systems have opened up opportunities for not very trustworthy organisations. In the same way as cross-border education has given way to rogue providers and 'diploma mills', there is the risk that 'accreditation mills' are entering the field, offering sub-standard accreditation services to educational providers. Such rogue accreditors easily can mislead the consumers including the public at large, given the assumption that accreditation stands for official recognition of institutions, programmes and qualifications. It therefore is very important that accreditation mills should be detected. Fairly simple measures and actions can be of great help here. Governments, agencies and their professional networks need to increase their awareness on the issue of accreditation mills and seek to develop monitoring and reporting systems that can lead to the identification of misleading quality assurance and accreditation agencies. CHEA has produced an information sheet on the subject, containing some very basic questions that help to determine whether an agency might be an accreditation mill. Furthermore, agencies and their networks could inform each other about organisations of disputable quality. Through the networks, quality assurance and accreditation agencies could publicly demonstrate their trustworthiness by participating in professional networks, compliance to good practices, regular external evaluation and recognition or registration by legitimate bodies.

3.3. Internationalisation of quality assurance and accreditation

As the tertiary education landscape itself is diversifying, also the quality assurance and accreditation systems are in a process of increasing diversity. National quality assurance and accreditation agencies still

occupy an important place in the system, but subject-specific evaluation and accreditation schemes, such as in business education, veterinary sciences, engineering or accounting, are being undertaken by institutions and programmes. Specialised accreditors such as the US based Association to Advance Collegiate Schools of Business (AACSB) or Accreditation Board for Engineering and Technology (ABET) and the European Quality Improvement System (EQUIS) are becoming active in other regions of the world. As already mentioned, cross-border delivery of programmes of course is an important area in which international evaluation and accreditation schemes are active, but institutions are also interested in international accreditation for domestically provided programmes and qualifications.

4. QUALIFICATIONS

4.1. Diversity of national qualification systems

As a rule, approved, authorised, accredited or recognised institutions and programmes can award qualifications to successful students that almost automatically are recognised by the national state. However there are many exceptions to this rule. In some countries, the state legally prescribes the degree structures institutions have to adopt. There are other cases where institutions have full degree-awarding powers, but are following in practice the basic guidelines of national qualification structures. These scenarios illustrate the diversity of national systems to award qualifications and the national character of these qualifications. One of the most important implications is that when a student or employee is moving to another country, these qualifications have to be recognised again in new host country. The internationalisation of skilled labour markets and growing professional mobility has therefore resulted in a significant increase in the demand for academic and professional recognition of foreign qualifications. The complexity of national qualifications and credentials and their lack of comparability increase the difficulties for qualified professionals and for credential evaluators in the recognition process. This leads to the importance for each institution to assume responsibility to award easily readable and transparent qualifications.

4.2. Academic recognition of qualifications and equivalence arrangements

There are different systems in the countries reviewed for the academic recognition of foreign qualifications. In the US, Australia, Canada and the UK there is no legal authority for the credential evaluation and formal recognition of foreign credentials and such recognition decisions are taken by individual institutions. In countries, where qualifications are based on law and recognition by the state, governments have set up or mandated agencies and procedures for the recognition of foreign qualifications and/or have decentralised decisions to the institutional level. In many countries, especially European based, advisory and information agencies have been established to assist credential evaluators and recognition officers and to provide information to students and foreign graduates. The European ENIC/NARIC network of recognition and information agencies is a well-known example, but similar bodies exist in other countries as well.

The establishment of procedures and agencies to recognise foreign qualifications has been stimulated and facilitated by the work of UNESCO. The UNESCO Conventions on recognition are the most significant instruments for the international tertiary education community and governments to cope with the issues of recognition resulting from international mobility of students and skilled labour. These conventions have shifted the focus of the recognition process in favour of the applicant and have laid the burden of proof upon the host country, thus facilitating recognition decisions. With the UNESCO conventions, the international legal framework for recognition of academic foreign qualifications is largely in place.

UNESCO has furthermore started a comprehensive process to update many of the Regional Conventions to take into account the new developments in cross-border higher education.

The UNESCO regional recognition conventions are being ratified by an increasing number of countries. However, there are still a rather high number of countries that have not yet ratified it or that are still in the process of doing so. Ratification by these countries of the "appropriate" UNESCO regional Convention could yield real benefits in terms of recognition. The UNESCO regional conventions are important tools to deal with the challenges of transnational education and internationalisation of labour markets and professions.

Besides the formal conventions, other international tools have been developed to facilitate the work of recognition centres and to inform students and graduates. Another important international instrument is the UNESCO/Council of Europe 'Recommendation on criteria and procedures for the assessment of foreign qualifications'. Together with the above mentioned 'Code of practice for the provision of transnational education', this document supplements the Lisbon Recognition Convention and provides additional guidelines on the implementation of the recognition conventions. Some individual countries, such as Canada, have elaborated their own complementary codes of practice for the assessment of foreign credentials. These instruments should be disseminated and applied as widely as possible in order to stimulate the accurate and convergent implementation of the conventions. Through this, the confidence will increase for applicants of recognition procedures for a fair and consistent processing of their request.

Mutual recognition agreements facilitating the acceptance or legal recognition between countries could be another tool for progress in the field of recognition of academic qualifications. Also international networks could be a vehicle for inter-institutional agreements on the mutual recognition of qualifications and credits.

In several countries around the world, joint degrees are emerging as a method for institutions to agree on curricula and learning outcomes. However, recent surveys indicate that national regulations on qualifications and their recognition still hamper swift procedures for recognition of such degrees in the respective countries. Joint degrees can be an interesting tool in the field of recognition of academic qualifications, if the swift recognition of those degrees in each of the participating countries can be guaranteed. The establishment of joint quality assurance systems or multinational accreditation can also help to facilitate such equivalence agreements of qualifications among countries. Multilateral initiatives by professional bodies to work towards agreed international standards for the profession, such as that undertaken by the International Union of Architects, can be a useful step. Professional mutual recognition agreements such as the Washington Accord for engineers, pursued via professional networks—including as part of regional trade agreements—can be equally important instruments. Professional mutual recognition agreements are especially interesting as they represent a focal point where academic and professional recognition issues meet.

4.3. Professional recognition of qualifications

Professional recognition of qualifications includes a number of different professional associations, regulatory bodies and employers' organisations and can therefore be a very complicated matter. The situation may be more or less clear in a number of regulated professions, due to national and international laws. But in the non-regulated economic or professional activity areas, which are far more numerous, the de facto decision on the validity of a certain qualification is at the discretion of an individual employer. This can lead to 'market values' of qualifications that can differ from context to context and from country to country.

In many countries, such as the US, the UK, Australia and Canada, autonomous professional regulatory bodies exist for a growing number of professions. These bodies set entry requirements and standards to which qualifications and credentials must comply. Because of the decentralised and deregulated nature of such arrangements, professional recognition can be very different in various constituencies. In continental European countries, there is a stronger tradition that state recognition of qualifications also implies professional recognition. This therefore, guarantees access to professional practice and may make matters more straightforward. However, professions are becoming more organised and increasingly impose additional requirements to holders of academic degrees for entry into the profession.

Graduates or professionals who want to enter professional practice in another country need accurate and timely information. They need information on regulations, the professional or labour-market value of their qualifications, and how to have their foreign qualifications assessed in order to get them professionally recognised. Employers also face an increasingly international reality in terms of qualifications validity and assessment and, as consumers, are also demanding clear information on the value of foreign credentials. In light of these new realities and complexities the employers are asking for recognition statements from competent authorities.

There is a need for information systems that include detailed documentation on the procedures and criteria used by the various professional bodies and the specific requirements set for holders of particular qualifications. Existing information centres at institutional or national level for academic recognition need to devote more attention to the professional recognition of qualifications in both the regulated and non-regulated sectors of the professional labour market. Furthermore, communication between institutions and recognition information centres on the one hand and employers, professional bodies and labour market observatories on the other, is required in order to improve the information and qualification assessment methodologies.

Increasing professional mobility, the development of international professional associations, and free trade agreements dealing with trade in professional services have brought the issue of professional recognition to the international level. There are now a number of initiatives to develop mutual recognition agreements to address issues of professional recognition and equivalency of standards and procedures. Free trade agreements have contributed to this development by encouraging the development of mutual recognition agreements between the parties to such agreements to facilitate trade in professional services. In general, regional trade agreements including provisions on recognition specify priority professions (e.g., accountants) and delegate the negotiation of such agreements to the relevant professional bodies. At the multilateral level, the GATS permits WTO Members to enter into recognition agreements with some Members but not others, as an exception to the Most Favoured Nation requirement which normally requires countries to give to all other WTO Members whatever they give to one Member. The GATS neither requires, nor sets standards for, recognition, but encourages, in appropriate cases, Members to work with relevant intergovernmental and non-governmental organisations towards the development of common international standards and criteria for recognition and common international standards for the practice of relevant services trades and professions.

An early and very influential example of mutual recognition of professional qualifications is the 'Washington Accord' for the engineering profession. It was developed in 1989 and the current signatories are engineering organisations of Australia, Canada, Hong Kong, Ireland, New Zealand, South Africa, United Kingdom, and the United States. In 2001, Japan was accepted as a provisional member of the Accord. Furthermore, Germany, Malaysia and Singapore have been given provisional membership status in June 2003. 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.

The Washington Accord example could inspire other countries and other professions to develop similar types of far reaching agreements. But to date, this has not been the case. More limited mutual recognition agreements and memoranda of understanding are being developed in other professions, mostly but not necessarily linked to free trade agreements. Some international professional associations are also developing guidelines on recognising standards of professional programmes, usually respecting national sovereignty and denouncing uniformity.

It is also important to ensure maximum information about existing agreements. WTO Members are also required to notify any recognition agreements of which they are a part, providing a relatively useful source of information about existing agreements. However, these notifications are subject to some limitations, including in relation to industry-only agreements and agreements concluded as part of regional trade agreements, and there is a need for improvements to ensure continuously updated and accessible international information on mutual recognition agreements.

4.4. Convergence in qualifications and competence-based learning outcomes

Contemporary tertiary education systems are affected by apparently two conflicting trends. On the one hand there is increasing diversification in institutions, programmes, qualifications, delivery modes, teaching and learning settings. On the other hand, there is also a process of convergence and standardisation going on in the same aspects of educational systems. The issue of recognition, acknowledges the diversity of programmes and qualifications, but is trying to arrive at some common understanding of the academic or professional functions of qualifications. This will allow the holder of qualifications to maximise the academic or professional benefits across social and cultural settings and, especially, across countries.

Several developments have the ambition to go even further and to enhance the convergence of programmes and qualifications themselves. The Bologna Process in Europe is a good example of this, with its ambition to arrive at comparable and compatible degree structures in the participating countries. Professional recognition arrangements, especially in the regulated professions, can have an important harmonising impact on curricula, learning outcomes and qualifications. There is increased understanding among international experts and policy-makers that it is of limited value to try to achieve convergence in the formal input and process characteristics of programmes. The way programmes are organised, the delivery mode, the specific teaching and learning setting, even the exact amount of time and workload invested in them, are increasingly diverging, but this divergence does not intrinsically affect the comparability of outcomes. It is of much more use to try to enhance the comparability on the level of learning outcomes, especially if these are described as competencies that are relevant for academic or professional practice. Description of programmes and qualifications in terms of the learning outcomes and competencies may help to determine their commonality and, hence, contribute to their recognition across countries. Accordingly, recognition agencies, credential evaluators, employers would need to re-examine their assessment criteria and procedures for comparing programmes and qualifications in order to accommodate learning outcomes and competencies and not focus only on input and process characteristics.

Focusing on learning outcomes and competencies has another important advantage, namely that it allows taking into account competencies and qualifications obtained in non-formal, non-traditional and non-tertiary education settings, and even those competencies acquired in informal learning outside any educational setting. The multiplication of sites and settings of learning in contemporary society, ranging on a continuum from formal to non-formal, including for example the workplace, the media and the Internet, leads to the infinite diversification of learning opportunities All this in turn challenges conventional notions on how learning is achieved and how qualifications are earned and recognised. The 'recognition' or 'accreditation' of prior and experiential learning is becoming a very interesting feature of modern

tertiary education systems whereby recognition is given and credits are awarded for competencies learned in other than formal learning environments. However, the traditional methodology of credential evaluation is not always fit for assessing competencies and there is still a large gap between the worlds of credential evaluation and the assessment of competencies. This represents a major challenge and conceptual shift for both qualification providers and for recognition agencies and credential evaluators.

4.5. The link between recognition and quality assurance

In the field of recognition of qualifications, it becomes more and more difficult to determine exactly what the value of a foreign qualification is. Diversification of programmes, qualifications, delivery modes, etc. and the acknowledgment of the relevance of non- and informal learning have devaluated the confidence put in traditional assessment criteria, such as curriculum, length of study and workload. Assessing the value of a particular qualification has become much more complicated. At the same time, evaluators, employers, professional bodies, etc. become more and more interested in determining the 'quality' of an institution, programme or qualification. Many of the problems encountered in recognition and credential evaluation practices basically have to do with determining whether a programme or an institution delivering a certain qualification meets the standards of basic quality. Therefore, recognition and credential evaluation agencies increasingly appeal to quality assurance agencies to inform them of the quality status of an institution or programme. Thus, cross-border cooperation between quality assurance agencies and recognition and credential evaluation centres becomes a pressing need. International networks of both communities are encouraged to establish joint working groups to determine common challenges, exchange experiences and develop areas of mutual interest. Furthermore, a dialogue with the professional associations is encouraged.