



COMPARABILITY STUDY OF ASEAN QUALITY ASSURANCE FRAMEWORK (AQAF) AND EUROPEAN STANDARDS AND GUIDELINES (ESG)





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COMPARABILITY STUDY OF ASEAN QUALITY ASSURANCE FRAMEWORK (AQAF) AND EUROPEAN STANDARDS AND GUIDELINES (ESG)

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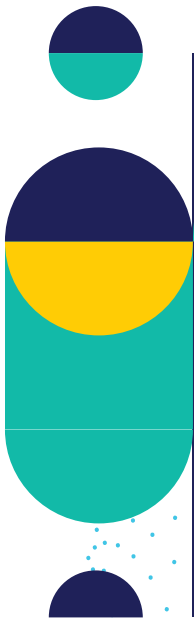
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Abbreviations

AACSB	Association to Advance Collegiate Schools of Business
ACC	Accreditation Committee of Cambodia
APQL	Asia-Pacific Quality Label
APQN	Asia-Pacific Quality Network
APQR	Asia-Pacific Quality Register
AQAF	ASEAN Quality Assurance Framework
AQAN	ASEAN Quality Assurance Network
AQRF	ASEAN Qualifications Reference Framework
ASEAN	Association of Southeast Asian Nations
AUN	ASEAN University Network
AUN-QA	ASEAN University Network-Quality Assurance
BDNAC	Brunei Darussalam National Accreditation Council
BFUG	Bologna Follow-Up Group
CHED	Commission on Higher Education
CHEA-CIQG	Council for Higher Education Accreditation - International Quality Group
DEQA	Division of External Quality Assurance
ECTS	European Credit Transfer and Accumulation System
EHEA	European Higher Education Area
EI	Education International
ENQA	European Association for Quality Assurance in Higher Education
EQA	External Quality Assurance Agency



EQA	External Quality Assurance
EQAA	External Quality Assurance Agency
EQAR	European Register for Quality Assurance
EQF	European Qualifications Framework
EQUIP	Enhancing Quality through Innovative Policy and Practice
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students Union
EU	European Union
EUA	European University Association
EURASHE	European Association for the Applied Sciences in Higher Education
GDETA	General Department of Educational Testing and Accreditation
HE	Higher Education
HEI	Higher Education Institution
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IQA	Internal Quality Assurance
LAM-PTKes	Lembaga Akreditasi Mandiri Perguruan Tinggi - Kesehatan
MQA	Malaysian Qualifications Agency
NAAHE	National Accreditation Agency – Higher Education
NQF	National Qualifications Framework
ONESQA	Office of National Education Standards and Quality Assessment
PAASCU	Philippines Accrediting Association of Schools, Colleges and Universities
QA	Quality Assurance
QF	Qualifications Framework



QF-EHEA	Qualifications Framework of the European Higher Education Area
RIHED	Regional Institute for Higher Education Development
SCOPE-HE	EU-ASEAN Sustainability Connectivity Package – Higher Education Programme
SEA	Southeast Asia
SEAMEO-RIHED	Southeast Asian Ministers of Education Organization - Regional Institute for Higher Education Development
TNE	Transnational Education
UNESCO	United Nations Educational, Scientific and Cultural Organization
WFME	World Federation of Medical Education



Foreword

Quality assurance in higher education is a cornerstone for improving student learning outcomes, enhancing institutional reputation, and ensuring overall accountability. It fosters the trust necessary to facilitate academic mobility and the mutual recognition of qualifications across borders. In this context, understanding how different quality assurance frameworks align is essential for strengthening regional and inter-regional cooperation.

The Comparability Study of the ASEAN Quality Assurance Framework (AQAF) and the European Standards and Guidelines (ESG) represents a significant contribution to this ongoing effort. Developed under the EU-ASEAN Sustainable Connectivity Package for Higher Education (SCOPE-HE)—a European Union-funded initiative implemented by the Netherlands' Organisation for Internationalisation in Education (Nuffic) in collaboration with the German Academic Exchange Service (DAAD)—the study supports continued dialogue between the Association of Southeast Asian Nations (ASEAN) and the European Union (EU), aimed at fostering stronger cooperation and facilitating cross-regional academic mobility.

This study complements a previous initiative, the *Comparability Study on the ASEAN Qualifications Reference Framework (AQRF) and the European Qualifications Framework (EQF)*, by providing evidence-based research on the comparability of higher education frameworks between the two regions. Together, these studies offer a more comprehensive understanding of how regional frameworks—both in quality assurance and in qualifications recognition—can align to support shared goals.

Specifically, the current study examines the background, contexts, standards, implementation, and impact of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG, 2015) and the *ASEAN Quality Assurance Framework* (AQAF, 2016). It concludes with a set of recommendations to promote the gradual harmonisation of quality assurance practices between ASEAN and the EU.

The findings have important implications for a wide range of stakeholders—including quality assurance agencies, higher education institutions, policymakers, and regional bodies such as the ASEAN Quality Assurance Network (AQAN) and the European Association for Quality Assurance in Higher Education (ENQA). By deepening mutual understanding of each other's frameworks, this work contributes to more informed decision-making, greater policy coherence, and the development of mechanisms that support recognition and mobility across the two regions.

We hope this study serves as a valuable reference for all those engaged in quality assurance and higher education policy and that it inspires continued cooperation and mutual learning between ASEAN and the EU.

SCOPE-HE

Jakarta, July 2025



Executive Summary

With increased global mobility of students and people across regions, recognition of qualifications has become an important concern to manage. National Qualifications Frameworks (NQFs) and Regional Quality Assurance Frameworks (RQAFs) have emerged to provide transparency of the higher education systems and promote mutual recognition of qualifications. There are now a number of RQAFs covering Europe, Latin America, Africa, Middle East, Southeast Asia, and Asia Pacific.

This comparative study examined the background, contexts, standards, implementation and impact of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereinafter called ESG) and ASEAN Quality Assurance Framework (AQAF). The ESG, established in 2005 (revised in 2015), and AQAF, in 2016, are RQAFs aimed at promoting common standards for external quality assurance agencies (EQAA) and institutional practices.

The ESG and AQAF were developed with the same aspirations of harmonising the QA practices of EQAAs and the institutions so that there is trust in each other's systems, across borders, to assure the quality of the qualifications achieved by students and professionals. The ESG were developed with the involvement of a full spectrum of HE stakeholders and enjoy strong and sustained political support by the ministers of education. AQAF was developed by EQAAs, regional education bodies and ministries of education. It did not have the broad stakeholder involvement and support that the ESG enjoy.

The ESG and AQAF are also similar in their aspiration to promote the enhancement of QA in the region by establishing common standards and principles. The two frameworks have three common domains addressing the functioning of the EQAAs, their external quality assurance (EQA) and accreditation practices and internal institutional quality assurance (IQA) practices. AQAF goes beyond this to also include principles on NQFs. It is clear from the comparative analysis of the standards (ESG) and principles (AQAF) that the two frameworks are highly comparable and, therefore, very much aligned. Some differences can be attributed to regional idiosyncrasies (e.g., the role of students in accreditation panels) and the degree to which some requirements are explicitly stated. There are some redundancies and inconsistencies in AQAF that must be addressed in any future revisions for better clarity and coherence.

In terms of implementation and impact, the ESG is now poised to undergo its second revision (due in 2026) and has wide influence and impact on the EQAAs and the institutions in the European Higher Education Area (EHEA). Full membership in the European Association for Quality Assurance in Higher Education (ENQA) and listing in the European Quality Assurance register (EQAR) requires compliance with the ESG. Over 200 agency reviews have been carried out. Recent surveys have shown that the ESG have benefited the EQAAs, institutions and governments. It is a success story. AQAF suffers from limited political support and lack of awareness among the key stakeholders – EQAAs, higher education institutions (HEIs), staff, students and industries. The ASEAN Quality



Assurance Network (AQAN) has not adequately incentivised EQAAs and national ministries of education to benchmark to the RQAF. It is yet to complete any formal agency reviews and there is very limited evidence of voluntary benchmarking to the QA framework. The aspirations remain largely unfulfilled.

It is the conclusion of this report that further efforts to align the two RQAFs so that they look identical should not be the priority. There is already a very high level of alignment between the two frameworks. Rather, the AQAF would benefit from consideration of how it could use the spirit of ESG and its implementation to achieve greater harmonisation of QA practices in the ASEAN region. Stronger political support is imperative to give the AQAF visibility and value. Recognition of the AQAF by competent authorities at the national and regional level is a *sine qua non*. There must be consideration of AQAN membership being dependent on the EQAAs undergoing cyclical AQAF reviews and/or benchmarking national QA practices to AQAF principles as requirements for membership or enhanced membership. Developing broader stakeholder engagement in and ownership of AQAF is vital to its stature as an RQAF to harmonise QA practices among ASEAN Member States. This report contains recommendations and suggestions for action that will strengthen the impact of both frameworks, leading to better mobility and mutual recognition between the two regions.



1

Introduction

- 1.1 Objectives, Scope and Significance of the Study
- 1.2 Methodology

Both ASEAN, the European Union and the wider European Higher Education Area (EHEA) countries share a common goal to foster better understanding of qualifications and higher education systems in the member countries. The Bologna Process, through its numerous ministerial communiqués and the active involvement of many stakeholders – European Association for Quality Assurance in Higher Education (ENQA), European Universities Association (EUA), European Association for the Applied Sciences in Higher Education (EURASHE), European Students Union (ESU) and others – created common reference points, like the Qualifications Framework-EHEA, the European Credit Transfer and Accumulation System (ECTS), and the Standards and the Guidelines for Quality Assurance in the European Higher Education Area (ESG). Together these instruments foster the harmonisation of higher education for more transparency, higher acceptance, and recognition of qualifications from member countries to support mobility of students, graduates and workers within the region.

Similarly, ASEAN leaders have expressed a clear desire for a region that is politically organised and economically integrated despite its diversity in development, history and culture since the establishment of ASEAN in 1967. Clear interest in creating a common space in Southeast Asian higher education was articulated in 2008 and has been reaffirmed through many declarations and initiatives since. The recent Buriram Declaration (2024) continues this commitment. Mutual recognition agreements have been agreed to; a network of selected universities in ASEAN has been developed – ASEAN University Network; a network for quality assurance agencies has been established – ASEAN Quality Assurance Network (AQAN); a common quality assurance reference for the region has been developed – ASEAN Quality Assurance Framework (AQAF); and a regional qualifications reference framework has been set up – ASEAN Qualifications Reference Framework (AQR). These are significant policy developments aimed at creating common reference points for ASEAN Member States in their quest to enhance higher education and create mutual trust in their qualification frameworks and systems.

As ASEAN and European exchanges grow and intensify, comparability studies of key regional quality assurance frameworks like AQAF and ESG can offer valuable insights to enhance ‘... mutual understanding between the two regions to support regional integration, enhance global competitiveness and facilitate more (inter)regional student mobility’ (SCOPE-HE, 2024).

1.1 Objectives, Scope and Significance of the Study

The objective of the study, as set out in Terms of Reference for the SCOPE-HE study, is to carry out a comparative study of the ASEAN Quality Assurance Framework (AQAF) 2016 and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) 2015, using desk-based research and qualitative interviews to understand the reference systems and implementation of frameworks at the regional (European Union [EU] and Association of Southeast Asian Nations [ASEAN]) level.



The scope of the study encompassed:

- A comparison of the principles and processes of the ESG and the AQAF
- A series of stakeholder consultations to identify regional challenges in implementing the AQAF, drawing on European Higher Education Area (EHEA) experiences to suggest solution
- The recommendation of strategies for advancing ESG–AQAF alignment and coordination to improve the international recognition of learner qualifications and facilitate both inter- and intra-regional mobility

As will be explained more in detail in Chapter 3.1, regional quality assurance frameworks (RQAFs) such as AQAF and ESG reflect the aspirations of the regions to contribute to harmonising the diverse higher education systems and practices to promote mutual recognition of qualifications and mobility of students and graduates. Although these RQAFs are founded upon well-established practices and norms, each also reflects the region’s culture, history, values and challenges. As mobility of students and graduates increases across regions, RQAFs have become a main driving force for the development or alignment of internal and external quality assurance in the countries of the respective regions; they form the basis of a common understanding and support trust. Furthermore, this development can establish the region as a relevant and powerful level for policymaking. Because mobility of students and collaboration between HEIs in the EHEA and ASEAN is growing, the two frameworks can play an important role to inform stakeholders in both regions about quality and quality assurance and, through their alignment, create mutual trust, thus facilitating collaboration. It is, therefore, important to carry out comparative studies of the RQAFs to establish the extent of comparability of practices and to learn from each other to further strengthen the frameworks.

The ESG, as a two-decade old framework now poised to undergo its second review, can be seen as a success story. In contrast, AQAF is still a developing framework with many challenges. The comparability study offers a timely opportunity to examine the similarities and differences between the two and consider the lessons the ESG’s implementation holds for the AQAF in ASEAN. This study provides a fresh set of ideas for all competent authorities in the region to recommit to AQAF in the quest to further enhance QA practices amongst EQAAs and HEIs in the region.

1.2 Methodology

This study employed three key methods to conduct the comparative analysis of AQAF and ESG:

- 1** A critical desktop review of literature and other documents related to quality assurance and quality assurance principles, and guidelines. This review was global in nature and provided a critical and compact review of the origins, development, implementation and impacts of regional frameworks, including the aims and objectives of the standards. All documents are referenced in Chapter 5 of this report.
- 2** A detailed technical comparison of the relevant groups of AQAF (2016) and ESG (2015) standards and principles. This analysis establishes areas of similarities and dissimilarities between AQAF and ESG and how these differences reflect unique regional differences and/or provide opportunities for further alignment and improvements between the two frameworks.
- 3** The focus group discussions with selected AQAF and ESG stakeholders i.e. EQAAs, HEIs, students, ministries, chambers of business, staff and IQA representatives (see Annexe 2 for list of the stakeholders interviewed) on their perceptions, experiences and expectations around implementation, changes and the need to align with other frameworks. This method helped to tease out the knowledge, understanding, perspectives and experiences of the different stakeholders in respect of the regional frameworks. Participants were invited and selected according to criteria that would allow the researchers to speak to all the main stakeholders from as diverse a set of backgrounds as possible (e.g. different countries/established or newer EQAAs etc). The researchers developed an overarching thematic grid from which they developed their specific questions (attached in Annexe 1) and all meetings were recorded with the permission of the participants, with a Zoom generated transcript and summary provided.

At the end of the study, the outcomes of all three aspects were considered in order to agree on conclusions and key recommendations/suggestions for the future.



2

AQAF and ESG: Contexts, Implementation and Impact: A Literature Review

- 2.1 Background: Regional Frameworks for Quality Assurance in Higher Education
- 2.2 The ESG: Context, Initial implementation and Intended impact
- 2.3 The AQAF: Context, Planned Implementation and Impact
- 2.4 Conclusion



2.1 Background: Regional Frameworks for Quality Assurance in Higher Education

The evolution of national systems of quality assurance in higher education since the 1980s is without doubt a significant development with a huge impact on the national higher education systems. As a particular feature of the evolution of quality assurance, the regional level gained importance in higher education and quality assurance by developing and implementing regional approaches. Since the turn of the century, regional harmonisation has become a powerful feature of quality assurance which takes mainly two forms at different levels of harmonisation.

At the first level, national actors in quality assurance in a region, mainly EQAAs,¹ collaborate to exchange experience and expertise and to support each other. Since the turn of the century regional networks or associations in the field of quality assurance have emerged, a development that began in Europe and became a global phenomenon. The INQAAHE website lists 18 regional networks among which the following are the biggest:

- Europe: ENQA ([European Association for Quality Assurance in Higher Education](#)), established in 2000
- Central America: RIACES ([Red Iberoamericana para el Aseguramiento de la Calidad de la Educación Superior](#)), established in 2003
- Asia-Pacific: APQN ([Asia-Pacific Quality Network](#)), established in 2003.
- Arab states: ANQAHE ([Arab Network for Quality Assurance in Higher Education](#)), established in 2007
- Africa: AfriQAN ([Quality Assurance Network for African Higher Education](#)), established in 2009

This development was preceded by the establishment of the global association INQAAHE ([International Network for Quality Assurance Agencies in Higher Education](#)) in 1991 which proactively supported the establishment of regional networks. In addition, sub-regional networks

1 In this article 'EQAA/agency' are used as generic terms that refer to all types of organisations that implement external quality assurance procedures in higher education; these may be public authorities, (semi-) autonomous organisations or private organisations, with or without a national legal mandate, with a national or regional/global focus.



such as the CEENQA (Central and Eastern European Network of Quality Assurance Agencies in Higher Education, est. 2001), SAQAN (Southern African Quality Assurance Network, est. 2015), CANQATE (Caribbean Area Network for Quality Assurance in Tertiary Education, est. 2004), AQAN (ASEAN Quality Assurance Network, est. 2008) and EAQAN (East African Higher Education Quality Assurance Network, est. 2011) were established (Wells, 2014). In the United States, the CHEA ([Council for Higher Education Accreditation](#), est. 1996) plays a similar role.

One important difference between such networks is related to membership criteria, notably whether agencies must fulfil certain agreed standards or whether all agencies in a given region are eligible. Although the missions of these networks and associations differ in detail, exchange of expertise and experience, mutual support, capacity building, and development of (good) practices are common features. Examples include the multilingual quality assurance [glossary of the Ibero-American Network for Quality Accreditation in Higher Education](#) in Latin America which complements the [glossary by the INQAAHE](#) and is a powerful tool in terms of creating a common understanding of terminology (Uvalić-Trumbić & Martin, 2021, p. 24). Another example would be guidelines for good practice such as [The Good Practices in Quality Assurance Systems](#) by SIACES.

Higher education institutions (HEIs) also use their regional associations to play an active role in the development of policies and approaches to quality assurance, such as the European University Association (EUA) with its [Institutional Evaluation Programme](#) (IEP) and the ASEAN University Network (AUN) with the [AUN Quality Assurance](#) (AUN-QA).

The second level can be characterised by a substantially higher degree of harmonisation through common approaches to quality assurance and a certain commitment to abide by those common approaches. The development started in Europe and spread across the globe:

- Europe (EHEA): adoption of the ESG ([Standards and Guidelines for Quality Assurance in the European Higher Education Area](#)), by the ministers of Bologna Process signatory countries in 2005
- Central America and the Caribbean (Spain, Portugal and Andorra): approval of SIACES ([the Ibero-American System for Quality Assurance in Higher Education](#)) by the ministers of the participating countries in 2018
- South America: approval of ARQU-SUR (University Degree Accreditation System for the Regional Recognition of the Academic Quality of University Degrees in the Mercosur and Associate States) by the Common Market Council in 2008
- Southeast Asia: approval of AQAF ([ASEAN Quality Assurance Framework](#)) by AQAN in 2016



- East Africa: approval of the [Principles and Guidelines for Quality Assurance in Higher Education](#) by the ministers of the East African Community in 2014
- Africa: the endorsement of the [Pan-African Quality Assurance and Accreditation Framework](#) (PAQAF) consisting of the African Standards and Guidelines for Quality Assurance (ASG-QA), the African Continental Qualifications Framework (AQTF), the African Quality Rating Mechanism (AQRM), Addis Convention for Recognition of Qualifications, African Credit Accumulation and Transfer System (not yet endorsed), and the Continental Register for Quality Assurance agencies and quality assured higher education institutions (in creation) by the Council of the African Union in 2016
- Pacific: [Pacific Quality Assurance Framework](#) (PQAF)
- Southern Africa: approval of the [Southern African Development Community Qualifications Framework](#) (SADCQF) including a regional quality assurance framework by the Southern African Development Community Technical Committee on Certification and Accreditation in 2016

In this context, INQAAHE's global framework should also be mentioned, which started with the Guidelines of Good Practice (GGP) adopted in 2003 and which were replaced by the [International Standards and Guidelines for Quality Assurance in Tertiary Education](#) (ISG) in 2022.

An important common characteristic of these frameworks is their embedding in a wider regional economic and/or political integration which includes higher education and aims at harmonising higher education systems and policies. This applies to Europe with the integration process starting in the 1950s and resulting in the establishment of the EU in 1993. However, (higher) education is not part of the responsibilities of the EU, and Member States used the 'open method of cooperation' in their efforts to collaborate and harmonise policies. With the inception of the Bologna Process, the wider area of the signatory countries of the European Cultural Convention became the most relevant regional framework for harmonising and even integrating policies. In South America, a similar process to create a common market began in the 1990s and led to the establishment of the Mechanism for the Accreditation of University Degree Programs of the MERCOSUR, Bolivia and Chile Southern Common Market (MEXA). This is also true for Southeast Asia with the development of the ASEAN since its foundation in 1967 and especially the Southeast Asian Ministers of Education Organization (SEAMEO) Regional Centre's (SEAMEO-RIHED) 2008 paper and the [Kuala Lumpur Declaration in 2015](#) that expanded cooperation to the field of higher education. In addition, the case of East Africa, moving towards the Common Higher Education Area (CHEA), is based on economic integration (Robertson et al., (eds.), 2016; Zapp & Ramirez, 2019).



Purpose

In general, the purposes are similar: to complement regional harmonisation of higher education with a common approach to quality assurance to create mutual trust and to support recognition of qualifications in the region and, consequently, support mobility of students and graduates.

Legal nature

A common feature is that the regional frameworks are not legally binding and thus are not intended to replace national systems, although in some cases they were adopted by relevant national authorities.

Content

The most obvious similarity is the focus on quality assurance of degree programmes and qualifications which is not surprising considering the embedding in economic integration and the policies to develop highly skilled labour forces.

Common features include the focus on both internal and external quality assurance. All regional frameworks include sections for internal quality assurance of teaching and learning at the HEIs and sections for EQA that regulate external reviews of HEIs and of their programmes. In addition, the quality assurance of the responsible EQAA is a common feature and one which is a new phenomenon introduced by the regional frameworks (Karakhanyan & Stensaker, 2020, p. 30).

Another common feature is the close link to qualifications frameworks, albeit in different forms. AQAF has the qualification framework as one of its four sections, whereas the ESG refers to the Qualifications Framework for the European Higher Education Area (QF-EHEA) as another Bologna commitment to be taken into account. PAQAF is the most comprehensive framework that integrates the various instruments explicitly into one framework while others only refer to related instruments. SADCQF takes the regional qualification frameworks as a starting point and relates quality assurance to their implementation.

Despite the general similarities, the regional frameworks demonstrate specifics such as coverage of institutional activities (i.e. research, innovation, community engagement and institutional management) by ASG-QA, specific references to distance and e-learning by ASG-QA, guidance for assuring the quality of qualification frameworks by AQAF and emphasis on student participation in quality assurance processes and requirements to publish external review reports in full by the ESG.

Nevertheless, one can conclude that at the core, these frameworks include similar approaches to quality assurance in teaching and learning as regards IQA, EQA and quality assurance of EQAAs. 'These fundamentals include the institutional responsibility for the quality of



education and the importance placed on quality culture; respect for institutional autonomy and independence of external quality assurance; reliance on self-evaluation combined with peer review and site visits as a basis for external quality assurance' (Loukkola, 2019).

Impact

Important aspects of the impact of regional quality assurance frameworks include:

- Regional frameworks have become 'a main driving force' (Hopbach, 2022, p. 15) for the development or alignment of internal and external quality assurance in the countries of the respective regions; they form the basis of a common understanding and support trust.
- Alignment with the frameworks 'supported credibility of their members through regional/international recognition at national level' (Karakhanyan & Stensaker, 2020, p. 21).

One development worthy of mention that is substantially supported by the regional frameworks is the establishment of the regional level as relevant and powerful for policymaking. It is also true that, in the field of higher education and quality assurance, '... our economic, political and legal spaces no longer coincide. Our economic space is overwhelmingly global, our political space is a mix of global, European and national, and our legal space is national' (Bergan, 2010, p. 10; Youssef, 2014, p. 101). In this situation the regional level has turned out to be the most effective which led to the evolution of regional actors such the regional networks of EQAAs as influential policymakers.

The establishment of RQAFs is not the first or the only attempt to organise quality assurance at a supra-national level. In the 1970s, the United Nations Educational, Scientific and Cultural Organization (UNESCO) triggered a discussion about regional cooperation in quality assurance through its set of regional recognition conventions and, together with the Organisation for Economic Co-operation and Development (OECD), they issued the [Guidelines for Quality Provision in Cross-Border Higher Education](#). The World Trade Organisation (WTO) tried to establish a regulatory framework through [GATS](#) (Hopbach, 2022). However, apart from GATS, such organisations used the 'soft law' approach through codes of practice, guidelines or declarations which are not legally binding. The approach with the most significant impact is the series of regional recognition conventions which resulted in the [Global Convention on the Recognition of Qualifications concerning Higher Education](#), adopted in 2019.

Whether or not a 'global quality assurance model' (Uvalić-Trumbić & Martin, 2021, p. 26) is dawning is not to be discussed here but it is true that the internationalisation of quality assurance has evolved as a *quiet revolution* that has been positively embraced (Salmi, 2023, p. 42).

The development of quality assurance was also supported by international organisations,



such as the World Bank, the OECD and UNESCO. A World Bank–UNESCO partnership (2007–2011) helped to strengthen five regional quality assurance networks and one international one by enabling the networks to share best QA practices and by facilitating other forms of collaboration among the networks (Wells, 2014; Salmi, 2015, 2017). The Global Initiative for Quality Assurance Capacity supported the network activities that were perceived to be the most useful. These activities included national and regional training workshops, network website development, internships at established EQAAs for staff members from emerging agencies in poorer countries, and financial support to enable QA leaders to attend international conferences (Uvalić-Trumbić & Martin, 2021, p. 22).

In conclusion, ‘regionalisation of higher education and notably of quality assurance and recognition of qualifications has established a new level of collaboration between providers, authorities, quality assurance agencies and not least the relevant stakeholder organisations’ (Hopbach, 2022).

2.2 The ESG: Context, Initial Implementation and Intended Impact

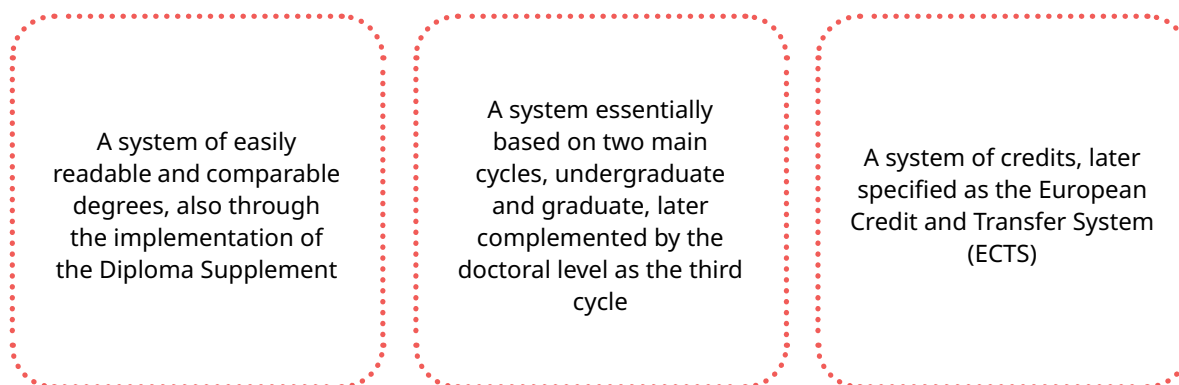
This section deals with the intention behind the purpose and objectives as originally set for the ESG, rather than the current level of achievement of those objectives, which is dealt with in Chapter 4 of this report. It discusses the origin and concept of the ESG, their *intended* purpose, implementation and impact, as well as a brief comment on any significant change to it following its revision in 2015.

Context

The impetus for ‘an agreed set of standards, procedures and guidelines on quality assurance’ for the European Higher Education Area (EHEA) came from the Bologna Process which, since its inception in 1999, has evolved as one of the major reforms in European higher education since the 1960s.



In 1999, the participating countries aimed at establishing:



and at promoting:



(Ministerial Communiqué, Bologna, 1999).

The importance of the Bologna Process in providing the forum and impetus for the development, design, implementation and relevance of the ESG cannot be overestimated.

First and foremost, it is important to acknowledge that the development of the ESG came only as one action line among others. The ESG are part of the 'Bologna-Infrastructure' that includes the three-cycle degree structure, the European Credit Transfer and Accumulation System (ECTS), and recognition of qualifications according to the Lisbon Recognition Convention; hence they and the development of quality assurance in European higher education in general have not evolved in isolation.

Secondly, the context of the Bologna Process limited the focus of the ESG to education; other missions of HEIs are not the subject matter of the ESG other than to recognise the possible links between them and quality assurance. This phenomenon applies to many regions in the world (Uvalić-Trumbić & Martin, 2021, Chapter 3.1).

Quality assurance gained momentum at the third ministerial conference in Berlin where ministers stated that 'the quality of higher education has proven to be at the heart of the setting up of a European Higher Education Area' and mandated 'ENQA through its members, in cooperation with the EUA, EURASHE and ESIB, to develop an agreed set of standards, procedures and guidelines



on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies...’ It is worth noting that ministers also established criteria for national quality assurance systems which should include:

- A definition of the responsibilities of the bodies and institutions involved
- Evaluation of programmes or institutions, including internal assessment, external review, participation of students and the publication of results
- A system of accreditation, certification or comparable procedures
- International participation, co-operation and networking

(Ministerial Communiqué, Berlin, 2003).

This shows clearly that, from the outset, the ESG, adopted at the subsequent ministerial conference in Bergen 2005, was meant to guide quality assurance but was not meant to create a European system that would replace national quality assurance systems.

Lastly, one framework condition outside higher education should be mentioned. The early years of the Bologna Process came in a period of high momentum in terms of European integration, later triggered by the Lisbon Strategy in 2010 which aimed to make Europe ‘the most competitive and dynamic knowledge-based economy in the world, capable of sustainable economic growth, with more and better jobs and greater social cohesion’ (Ministerial Communiqué, Berlin, 2003).

Three aspects might be said to have contributed significantly to the successful implementation and perceived relevance of the ESG:

1 The voluntary nature of the Bologna Process

One of the features of the Bologna Process, and one which has a parallel in the Lisbon Strategy, lies in its legal nature. It should be stressed that the Bologna Process is a voluntary one that evolved by copying the *open method of coordination* of the EU. This working method may be described as a form of ‘soft law’. It is a form of intergovernmental policymaking in fields where the EU has no responsibility and that does not result in binding EU legislative measures. It became powerful with the inception of the Lisbon strategy. Although its role as a reform process that impacts on higher education in the participating countries cannot be overestimated, nonetheless this voluntary,



'soft law' approach is key to understanding the impact of the Bologna Process.² The Bologna Process and the EHEA are built on the commitment of its participants which are first and foremost the countries (initially 29 and 49 today),³ the EU Commission, and stakeholders to implement the agreed policies. There is no legally binding framework at EHEA level and agreed policies become legally binding only through national legislation (the only exception is the Lisbon Recognition Convention which is an international treaty ratified by the countries and hence directly legally binding). This led, firstly, to the fact that the ESG did not create a blueprint for quality assurance in higher education. On the contrary, as will be demonstrated in more detail in Chapter 4, a variety of structures and procedures were developed and implemented in internal quality and external quality assurance. This was a direct consequence of the refusal of ENQA and its partners to include 'procedures' in the ESG as requested in the mandate but limit them to 'standards' and 'guidelines' (ESG, 2005, p. 12). Secondly, this led to significantly different paces of implementation. The Bologna Follow Up Group (BFUG) as the executive structure of the Bologna Process between the ministerial conferences reacted to this by establishing various working groups to support the countries which were deemed to be lagging.

2 The role of stakeholders

Another feature of the Process is the significant role of stakeholders in its working method, policies, etc., and are developed by working groups that comprise a selection of national representatives and of stakeholders, namely EUA, the European Association of Institutions in Higher Education (EURASHE), European Students' Union (ESU), ENQA, Education International (EI), Union of Industrial and Employers' Confederations of Europe (UNICE), and organisations such as the Council of Europe and UNESCO. It is fair to say that the expertise of stakeholders has been crucial in developing the Bologna Process. The development and revision of the ESG not only *involved* stakeholders but was completely in stakeholders' hands. Although the mandate to develop the ESG was given to ENQA and the subsequent working group was an ENQA working group, ENQA took the responsibility of involving other stakeholders seriously and thus ensured their involvement in the process. This was the origin of the close collaboration of the four organisations. The group became known as the E4 and its activities in the field of quality assurance also included the organisation of the European Quality Assurance Forum (EQAF) on an annual basis and the foundation of EQAR. This became an even stronger feature of the revision of the ESG between 2012 and 2015 when the initial 'Mapping the Implementation and Application of the Standards and Guidelines for Quality

2 Veiga & Amaral. (2006). The Open Method of Coordination and the implementation of the Bologna Process. *Tertiary Education and Management* 12, pp. 283-295.

3 Currently, two members are suspended because of the Russian war against Ukraine.



Assurance in the European Higher Education Area (MAP-ESG, 2010-11)' project sought to engage with the E4 Group and beyond (key stakeholders also included employers as represented by Business Europe, EI, government representatives identified by the Bologna Follow Up Group (BFUG) and EQAR). The project is a feature of the current revision process for the second revision of the ESG.

Since the ESG is the only Bologna tool that was developed exclusively by stakeholders, it is fair to say that, although formally adopted and thus formally 'owned' by the ministers of the signatory countries, it is based on a consensus of the stakeholders. The strongly consultative and participative approach to its inception, design and development is most likely one of the reasons why the initial acceptance and implementation of the ESG was reasonably smooth.

It should be noted that the ESG (Parts 1 and 2) did not emerge as a brand-new concept. They were a continuation of and building on the experience of the *European Pilot Projects* that developed as core elements of the external evaluation of degree programmes during the 1990s. The *European Pilot Projects* formed the methodological core of quality assurance in higher education in Europe up to the present day (Sursock, 2012, p. 254; Hopbach, 2020).

3

The emergence of the importance of agency reviews

As previously mentioned, standards and guidelines for EQAAs as included as Part 3 of the ESG were a new phenomenon in regional approaches to quality assurance. This was the basis for another important element of the RQAF in the EHEA, namely the external evaluation of quality assurance agencies. Together with the adoption of the ESG, the ministers, '...commit[ed] ourselves to introducing the proposed model for peer review of quality assurance agencies on a national basis... We welcome the principle of a European register of quality assurance agencies based on national review...' (Bergen Communiqué, 2005, p. 3)

The ratification of the development of a process for the review of EQAAs and the associated creation of the EQAR were also to have a significant impact on how the ESG was viewed and, indeed, how quality assurance in the EHEA would develop over the coming years. However, the key point in relation to the importance of this development is the impact that it had on the implementation of the ESG: the fact that it became - practically and sometimes in legal terms - necessary, for an EQAA to be successfully reviewed against the ESG in order to retain ENQA membership had a major impact on the implementation of the ESG (see below) and also on the development of ENQA as an association and its role in the EHEA.

Purpose

The voluntary and developmental approach taken by the Bologna Process is mirrored in the foreword and introductory sections of the ESG 2005; their intention is that the standards and guidelines enshrined therein should be 'useful and inspirational' (ESG, 2005, p. 5). Indeed, this version of the ESG is described as a report: an indication of how its authors believed it would be received at this time. This was to be proved wrong in the rapid adoption and implementation of the standards and guidelines in diverse ways across the countries of the EHEA. The 'report' saw itself as, '...no more than a first step in what is likely to be a long and possibly arduous route to the establishment of a widely shared set of underpinning values, expectations and good practice in relation to quality and its assurance...' (ESG, 2005, p. 5). Whilst the journey can rightly be described as long, in that it is without a final destination, for the reasons described above, the enthusiastic adoption of the ESG in national contexts might not now be described as 'arduous.'

The introduction also recognises that, 'The EHEA... is characterised by its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations. This makes a single monolithic approach to quality, standards and quality assurance in higher education inappropriate... the report sets its face against a narrow, prescriptive and highly formulated approach to standards... it believes that this approach is more likely to lead to broad acceptance in the first instance and... will provide a more robust basis for the coming together of the different higher education communities across the EHEA...' (ESG, 2005, p. 11).

The parallel creation of a model for the review of EQAAs along with EQAR was intended to provide a public list of credible and trustworthy agencies that had been successfully reviewed against the ESG. It is worth mentioning at this point that the original intention was that, wherever possible, the review of an EQAA should be carried out by a competent national body. One of the key changes between the 2005 ESG and the revised 2015 version was that, in that decade between them, the organisation of reviews became almost exclusively the role of ENQA, not least because of its understanding of the requirements of EQAR and the requirement to align with the ESG (see 'Intended Impact' below for further detail).

Intended Impact

It is useful at this point to remind ourselves that the overarching intent of the ESG as set out in the introduction to the ESG 2005 was to increase consistency of QA across the EHEA, provide common reference points for HEIs and EQAAs, make it easier to identify credible and trustworthy EQAAs, strengthen the recognition of qualifications, encourage exchange of experiences and increase mutual trust in HE across the region. As mentioned before, the intention was not to create a unified system.

This was the intended impact of the ESG as it was developed between 2003 and 2005. Between 2012 and 2015 the ESG was revised; however, a fundamental change was not envisaged and the



mandate by the 2012 ministerial conference focused on the purpose 'to improve their clarity, applicability and usefulness, including their scope' (ESG, 2015). In relation to the 2015 version of the ESG, the EQUIP project report, 'Comparative analysis of the ESG 2015 and 2005' (ENQA, 2016), makes it clear that, while the 2015 version includes recent policy initiatives as well as a strengthening of the focus of certain areas (e.g. QA of TNE and cross-border HE), the original principles, purposes and ethos remain untouched. It remains to be seen what direction the 2025 update will take.

2.3 The AQAF: Context, Planned Implementation and Impact

Context

ASEAN has achieved remarkable success in engaging and keeping the different powers and regions on an even keel despite the divergent interests of Member States. The desire for economic and cultural cooperation including the development of regional identity has evolved and remained on the table through various declarations. Education focused institutions like SEAMEO-RIHED, UNESCO Bangkok Office, AUN and many Europe-ASEAN dialogue platforms have worked often with common aims, in collaboration and sometimes in an uncoordinated manner with each other to create a common regional identity. The 2009 SEAMEO-RIHED document of regional integration focusing on higher education, the KL Declaration and work plans (2015), the ASEAN Education Work plans, AQAN, AQAF, AQR, EU-SHARE programme, and the recent Buriram Declaration (2024) have all furthered the harmonisation of the ASEAN higher education agenda with varying levels of success (given that these initiatives often lacked coordination), supported financially by external players, and involving non-state actors. Seeking regional unity and identity but always recognising and respecting diversity charts the way for a softer harmonisation approach and strategy which is necessarily gradual and evolutionary.

Literature Review: Regional Higher Education Frameworks in the Asia-Pacific Region

Regional higher education frameworks in the Asia-Pacific region play a critical role in fostering academic mobility, enhancing quality assurance, and aligning educational standards across diverse national contexts. This review examines scholarly and grey literature on the subject, focusing on the ASEAN University Network (AUN), the Asia-Pacific Quality Network (APQN) and initiatives under UNESCO's regional education frameworks.

Regional Integration/Harmonisation in Higher Education

The Southeast Asian (SEA) countries' aspirations to work together to share information on education policies and practices and to learn from each other predates the 2008 Declaration (Dang, 2015). The regional development and integration intentions first manifested themselves in the establishment of the Regional Institute for Higher Education Development (RIHED) in 1959 by UNESCO and the International Association of Universities. A more indigenous and political expression of interest to promote regional cooperation in the fields of education, science and culture emerged through the establishment of SEAMEO in 1965. Later, RIHED was placed under its wing as SEAMEO-RIHED in 1993. From its inception the SEAMEO-RIHED's objectives were to promote sharing of information and experiences in education between and among SEA countries for common benefit and development.

Although the focus on cooperation on quality assurance and quality assurance networks as a facilitating vehicle began in earnest around 2005, the interest in developing a common, regional-level quality assurance framework dates to the formation of AUN-QA with support of SEAMEO-RIHED and the ASEAN Secretariat. A key milestone in the regional integration effort was the establishment of the ASEAN University Network (AUN) by the ASEAN Higher Education Ministers in 1995. It was a major concrete initiative to promote 'regional identity and solidarity, human resource development and collaboration' between ASEAN universities, although it was limited to key HEIs in SEA countries. AUN is now recognised as part of the ASEAN Secretariat that supports the Socio-Cultural Pillar in ASEAN.

In 1997, AUN launched the first quality assurance guidelines for higher education institutions (HEIs) in ASEAN. One of the expressed objectives of AUN-QA is to promote, develop and harmonise the quality of higher education in the region through quality assurance, teaching and learning, research and community service at the institutional level. This was the first attempt to provide a common higher education quality framework for ASEAN HEIs. Since 1997, AUN-QA has revised the guidelines and extended it to include institutional assessment as well. Through its own creation of a standardised approach to external quality assurance, AUN-QA has helped to harmonise the institutional and programme quality assurance practices through the quality assessment guidelines and expert panels from advanced ASEAN countries, namely Singapore, Malaysia, Thailand and the Philippines. The AUN-QA assessments are recognised in lieu of national accreditation and/or assessment in Thailand, Vietnam, Cambodia, Lao PDR and the Philippines.

Asia-Pacific Influences

There were three key developments in the wider region related to higher education and quality: The Tokyo Convention 1983 and 2011, the Brisbane Communiqué established in 2006 and the establishment of Asia Pacific Quality Network (APQN). The former was about the quality of qualifications and the latter was about the QA agencies that assured the qualifications.



UNESCO's Asia-Pacific Regional Convention on the Recognition of Qualifications in Higher Education (Tokyo Convention, 2011) is a landmark initiative aimed at facilitating academic recognition across the Asia-Pacific region. The Convention underscores the need for standardised practices to ensure the recognition of degrees and qualifications. The Tokyo Convention or Asia-Pacific Regional Convention on the Recognition of Qualifications in Higher Education was first adopted in 1983, well before the Lisbon Recognition Convention. The revised 2011 Tokyo Convention came into force in 2018 after it received the five required ratifications and has only 11 members to date (Wang, 2022). Although most Asia-Pacific nations have not ratified the convention, its principles have been widely adopted by National Information Centres (NICs) and NQFs. All ASEAN nations except Singapore now have an NQF, although the level of implementation of the principles is still highly variable (Bateman & Dyson, 2018).

Grey literature from UNESCO, such as policy briefs and regional reviews, provides comprehensive analyses of implementation challenges. For example, UNESCO's (2020) report on the Tokyo Convention highlights issues such as varying levels of institutional readiness and the lack of a harmonised credit system. These barriers underscore the importance of capacity-building programmes to support implementation.

Asia-Pacific Quality Network (APQN)

On a broader front, APQN came into being in 2003, providing a common platform for quality assurance agencies in the Asia-Pacific and reflecting growing interest in the quality assurance of higher education due to massification, widening of access, and privatisation of higher education. It 'strives for Enhancing the Quality of Higher Education in the Asia-Pacific Region and Dissolving Boundaries for a Quality Region'. This aspiration for a borderless quality region is certainly at odds with ASEAN's approach of evolving common practices through principle-based and aligned harmonisation.

APQN was instrumental in the development of the Chiba Principles which outlined the basic principles for quality assurance of higher education in the Asia-Pacific region. The Chiba Principles, which relate to institutional responsibility for quality and hence IQA, and to the role of EQAAs and EQA in creating trust in the qualifications for national and international users, inspired and influenced the AQAF. Quadrants 1 on EQAAs, 2 on standards and criteria for accreditation, and 3 on IQA, substantially reflect the three interlocking spheres identified in the Chiba paper. The 21 principles enunciated in the Chiba paper are expanded into the 30 principles contained in Quadrants 1, 2 and 3 of AQAF. The notion of creating common reference points to facilitate harmonisation among the highly diverse Asia-Pacific region countries without requiring adaptation was a central Chiba principle which the AQAF adopted. The inspirational, developmental and voluntary alignment is founded upon this principle.

A survey conducted by APQN for the Brisbane Communiqué Region in 2008 helped to highlight the growing role of NQFs in raising the quality and quality assurance capacity in the Asia-Pacific region and raised the importance of NQFs in generating trust for better recognition of qualifications

and mobility of students. The Brisbane Communiqué Region also projected the importance of NQFs in making qualifications systems more transparent and understandable, and the critical role of QA in recognition of qualifications. The AQAF eventually included principles relating to NQFs which it promoted as unique and indigenous to ASEAN in comparison with the ESG and INQAAHE frameworks.

To date, APQN has 192 member EQAAs from some 45 countries in South Asia, the Far East, former Soviet states and Island states. In 2012, the Asia-Pacific Quality Register (APQR) was set up to evaluate EQAAs in the region based on a set of principles which mirrored INQAAHE. To date, APQR lists less than 30 EQAAs, including one from ASEAN Member States. In 2014, the Asia-Pacific Quality Label (APQL) was established to provide a thematic evaluation for international or transnational education (TNE) for high education institutions. It is yet to list any successful evaluations.

Despite significant progress, RQAFs in the Asia-Pacific region face challenges related to funding disparities, policy alignment, and institutional capacity. Marginson (2018) points out that while frameworks like AUN-QA and APQN provide a solid foundation for regional integration, achieving true harmonisation requires overcoming national priorities that often supersede regional goals.

From Integration to Harmonisation

In 2005, SEAMEO-RIHED created a platform, the Southeast Asian Higher Education Senior Officials Meeting (SEA-HiEd SOM), to bring together senior officers in higher education to discuss priorities and set directions for harmonisation of SEA higher education (SEAMEO-RIHED, 2019). This led to the development of a policy paper entitled 'A Structured Framework for Regional Integration in Higher Education in Southeast Asia: The Road towards a Common Space', which was endorsed by the 43rd SEAMEO Council Meeting in March 2008. The 2008 endorsement publicly expressed interest in creating a common higher education space among ASEAN Member States.

This was inspired and influenced by what was happening in Europe since the Bologna Declaration in 1999 (Dang, 2015). However, the regional integration concept was revised upon advice by ASEAN ministers to a softer, slower pace, with a more aspirational and more politically palatable concept of harmonisation (Supachai, 2022). This concept was more in accord with the diverse priorities, progress, history, culture, politics and governance of the ASEAN Member States. It draws attention to the importance of and the necessity for harmonising towards a common HE space – the aspiration – but leaves to the individual states to adopt, adapt and respond as they see fit – the reality. Many studies have examined the different initiatives to harmonise higher education in SEA countries. The issues and intricacies identified are similar and the conclusions are always one of hope based largely on still unseen collective political commitment of the ASEAN Member States for strong harmonisation (Pohlentz & Niedermeier, 2019; Khalid et al., 2019; Lim et al., 2023).

In 2008, SEAMEO-RIHED proposed, among others, a mechanism to promote harmonisation of quality assurance systems in SEA countries. It called for the establishment of a network of quality assurance bodies/agencies in ASEAN. Through this network, national EQAAs could share and learn



from and about each other's QA systems so that trust can be cultivated in each other's quality assurance practices, leading to better collaboration between these agencies and the HE system.

On July 8 2008, the officials of quality assurance authorities and ministries of higher education adopted the Kuala Lumpur Declaration which underscored the role and importance of AQAN (AQAF, 2016). AQAN was formally registered as an association in Malaysia on July 25 2014, and recognised by ASEAN as an affiliated entity in 2016. MQA continues to host the AQAN Secretariat to this day. Although AUN, as a network of leading universities in ASEAN Member States, played a role in the establishment of AQAN, wider higher education stakeholder involvement was very limited. It remained a state-based QA network rotating the chairmanship between national QA bodies/ministries very much in the spirit of the ASEAN governance system. The larger pool of QA agencies – professional, skills, vocational, etc. – that was an important part of the higher education ecosystem was uninvolved in the formation of AQAN and remains untapped for membership. An EU-SHARE project which supported revision of the AQAN constitution proposed that the national quality assurance agencies be replaced with nationally recognised QA entities and was adopted without effective engagement of the larger QA fraternity.

The Creation of AQAF

At a round table meeting of AQAN in 2011 in Brunei, a decision was taken to embark on a project to develop an ASEAN Quality Assurance Framework (AQAF). A task force comprising representatives of SEAMEO-RIHED, AUN-QA, the Office of National Education Standards and Quality Assessment (ONESQA), the Malaysian Qualifications Agency (MQA), the General Department of Educational Testing and Accreditation (GDETA), Brunei Darussalam National Accreditation Council (BDNAC) and the Philippines Accrediting Association of Schools, Colleges and Universities (PAASCU) was formed to develop the framework. In developing this framework, the taskforce studied the European ESG (2005), INQAAHE Guidelines for Good Practices, the Chiba Principles of Asia-Pacific Quality Network (APQN) and the CHEA-CIQG quality principles (Manzala, 2020). The taskforce developed a quality framework that is indigenous, principles-based, developmental, aspirational, and voluntary. It was inspired by the other regional QA framework but was designed in recognition of the divide and diversity of HE, QA and QF systems in ASEAN. The aims were limited, the purpose was benchmarking for development, the pace was expectedly slow, and the mechanism was simple and presumably to be elaborated when implemented (AQAF, 2016, pp. 13–15).

AQAF – The Principles

AQAF presents the 40 principles in four interconnected quadrants relating to the establishment and operation of a competent EQAA, credible external quality assurance processes and standards, the effective internal quality assurance of institutions and the implementation of the NQF. Each of the four quadrants has 10 principles that articulate the good principles to be observed. The Guidance Notes and Interpretation provide further explanation of the principles for consistent

application by all users.

AQAF reflects the principles and practices adopted by other RQAFs, but it charted its own unique and indigenous approach (AQAF, 2016, pp. 7–12). The inspiration for the quadrants and the principles is the Chiba Principles which were developed and agreed upon by many ASEAN states within the Brisbane Communiqué Region arrangement (Chiba Principles, 2008). The principles are higher order statements which leave the implementation to the national needs and practice. However, AQAF adopted the NQF as its fourth quadrant as all ASEAN states except Myanmar and Singapore had an NQF at that time but also recognised that most EQAAs had no direct responsibility for such a qualifications framework (AQAF, 2016, p. 15). Other RQAFs address the NQF only indirectly or implicitly as a QA requirement with which national HEIs are required/expected to demonstrate alignment. AQAF clearly sought to direct EQAAs' attention to the NQFs in their respective states, recognising the complementary role the national EQAAs play in institutionalising NQFs. The ASEAN Qualifications Reference Framework (AQR, 2016), yet another instrument to promote transparency of degree structures and quality, was in the final stages of endorsement by ASEAN ministers. There is substantial overlap in the task force which developed AQAF and that which helped review and refine the AQR. These overlapping experts arguably helped to create the synergy between the two frameworks with AQAF Quadrant 4 and AQR referencing guidelines that link with the AQAF.

2.4 Conclusion

In both the ASEAN and the EHEA regions, frameworks have developed with a common aspiration for harmonisation, despite considerable economic, political, social and cultural diversity in the respective region.

This chapter demonstrates that the nature, content and success of the implementation of ESG and AQAF cannot be understood without taking into consideration their specific backgrounds and the frameworks within which they were developed.

As far as the ESG is concerned, its underlying principles, nature and content mirror the key features of the Bologna Process of which the ESG is one key component. The latter is of the utmost importance for the implementation of the ESG. Two more framework conditions with crucial relevance for implementation and further development stand out: i) the role of stakeholders in their development laid the foundation of what can be called a substantial ownership of the ESG by the main stakeholders; ii) the practically compulsory external evaluation of quality assurance agencies made the implementation of the ESG at national and at institutional level indispensable.

As far as the AQAF is concerned, it was born from the need of the key regional agencies and regional integration champions like SEAMEO-RIHED to promote the harmonisation of SEA higher education systems through the creation of a common reference framework for EQAAs in the region. Although its development had the support of the national EQAAs and the ASEAN Member



States, it had a relatively limited ownership amongst the EQAAs in the region, and none among other stakeholders. With hindsight, the strategic and collective decision to present AQAF as an aspirational, developmental, and voluntary self-referencing tool was not a strong basis for its implementation.

Nevertheless, it is interesting to note that there is clearly a view in ASEAN that the development of the AQAF would be at a slower pace than that of the ESG and that it would be aspirational – a benchmark that the different countries in the region could adopt and adapt as they see fit, according to national context. In fact, this is not so far removed from the goals that were originally set for the ESG which was against the development of a ‘monolithic’ QA system, recognising that this would not be appropriate for a region of 49 countries, all with their own national, political, educational and social contexts.



3

AQAF and ESG: Comparison of Concepts, Approaches, and Content

- 3.1 Analysis of AQAF Quadrant 1 and ESG Part 3 (QA of EQAAs)
- 3.2 Analysis of AQAF Quadrant 2 and ESG Part 2 (External Quality Assurance)
- 3.3 Detailed Comparison of AQAF Quadrant 3 and ESG Part 1: Internal Quality Assurance
- 3.4 Overarching Conclusion on the Comparison Study



This comparative analysis examines the principles of the AQAF 2016 and the standards in the ESG 2015 together with the guidelines provided in both these frameworks to explain their meaning, scope and application. The analysis focuses on identifying overlaps, gaps and key distinctions.

This section of the report presents the comparison of the ESG and the AQAF, including a comparative analysis of general underlying concepts and approaches, of the purposes and the structures of the frameworks and their content. The basis of the comparison is the revised 2015 version of the ESG; reference is also made to the 2005 version of the ESG where the evolution is relevant; however, it should be noted that the two versions do not contain fundamental changes regarding their content (Gover & Loukkola, 2018).

It should be emphasised that the two documents were written in different regions of the world in different political, legal and, not least, cultural and linguistic contexts. The comparison will not overstretch the terminological or linguistic similarities or differences. Experience tells that such similarities and differences are not necessarily based on similar or different concepts but may simply be based on habit.

Therefore, a pragmatic approach was chosen. Examples are, firstly, the use of the terms 'Standard' in the ESG and 'Principle' in the AQAF. Although linguistically these terms carry different meanings, the roles of both are very similar or even the same as will be shown later. Second is the use of the terms 'Guidelines' in the ESG and of 'Interpretation/Guidance Notes' in the AQAF. They serve a very similar or the same purpose, even though a strict interpretation would hint at a different or at an additional purpose. In both cases, experience of the implementation and the understanding of the two frameworks show that the terms carry the same meaning despite their overt differences.

In this introductory part of the chapter, a general comparison of the ESG and the AQAF, their underlying concepts, their structure and their approaches are presented. This comparison includes findings that apply to the three components of the two frameworks which are compared individually below.

Context

Both frameworks refer to the broader context of their genesis, the processes of economic integration in their regions and especially the contribution of higher education to economic and social developments, particularly to human development (AQAF, 2016, p. 1; ESG, 2015, p. 4).

Goals and Purposes

Based on the development of regional approaches to quality assurance as explained in Chapter 3.1, it does not come as a surprise that the two frameworks demonstrate similar goals and purposes. The 'key goal' of the ESG 'to contribute to the common understanding of quality assurance



for learning and teaching across borders and among all stakeholders' (ESG, 2015, p. 4) has a direct equivalent in the AQAF which 'seeks to provide a common ground and understanding of quality assurance within ASEAN countries' (AQAF, 2016, p. 5). It is worth noting that only the ESG name stakeholders in this context which will be discussed later. The purposes of both frameworks are very similar, as shown in Table 1.

Table 1: ESG and AQAF - Purposes

ESG	AQAF
<ul style="list-style-type: none"> ■ They set a common framework for quality assurance systems for learning and teaching at European, national and institutional level ■ They enable the assurance and improvement of quality of higher education in the European Higher Education Area ■ They support mutual trust, thus facilitating recognition and mobility within and across national borders ■ They provide information on quality assurance in the EHEA (ESG, 2015, pp. 5-6) 	<ul style="list-style-type: none"> ■ The primary purpose of the Framework is to enhance the quality of education in the ASEAN region and to support the mobility of students, workers and professionals, both within and outside the region ■ Each educational system has evolved in a specific context and is influenced by cultural and historical factors. These Principles can be adapted in various political, legal, and cultural settings without compromising a country's basic values and traditions ■ The Framework enables quality assurance agencies and higher education institutions in each country to improve themselves and to align with others across the region (AQAF, 2016, p. 7)

At the core of both frameworks is an RQAF in higher education, that covers the regional, the national (EQAAs) and the institutional levels. Recognition of degrees is highlighted as a major intended impact. Aspects that are mentioned in only one of the frameworks, namely supporting trust (ESG); providing information on quality assurance (ESG); and promoting regional harmonisation in higher education (AQAF), do not constitute additional purposes as such but are merely variations of other aspects. This is also true for the AQAF purpose of promoting harmonisation of higher education which is not mentioned in the ESG but is part of the Bologna Process.



Principles

The ESG lists four overarching principles for quality assurance in the EHEA:

- Higher education institutions have primary responsibility for the quality of their provision and its assurance
- Quality assurance responds to the diversity of higher education systems, institutions, programmes and students
- Quality assurance supports the development of a quality culture
- Quality assurance takes into account the needs and expectations of students, all other stakeholders and society (ESG, 2015, p. 8)

The AQAF does not include a similar explicit list of underlying principles for quality assurance in general; however, the introduction to Quadrant 3 includes a similar statement about the responsibility of institutions, 'A fundamental principle in quality assurance of higher education is that quality primarily rests with the higher education institutions themselves', and states that the institutions must safeguard the interest of their stakeholders including students and society (AQAF, 2016, p. 9). Also, the 'diversity of higher education systems, cultures and traditions within the region' is addressed (AQAF, 2016, p. 5). It is fair to say that the emphasis on quality culture in the ESG reflects a very European discussion; however, a culture of quality is mentioned in AQAF 3.4.

Quality Assurance – Standards – Principles – Guidelines/ Guiding Notes: Concepts

The analysis of conceptual characteristics of the two frameworks reveals a substantial difference in so far as the ESG contains a dedicated chapter about conceptual questions whereas the AQAF stays silent in this regard. However, a closer look shows that the conceptual deliberations in the ESG have a very specific background that do not constitute a difference in this regard.

Quality in Higher Education and Quality Assurance

Firstly, it should be mentioned that both frameworks refrain from introducing an explicitly elaborate definition of *quality in higher education*. At first sight, this might surprise but participatory observation tells that these discussions might be scientifically interesting but not necessarily helpful for designing these kinds of frameworks. The ESG addresses this issue at a general level by stating that '*Quality, whilst not easy to define, is mainly a result of the interaction between teachers, students and the institutional learning environment*' (ESG, 2015, p. 5). However, an important conceptual hint is given in the statement that '*...stakeholders, who may prioritise different purposes, can view quality in higher education differently and quality assurance needs to take into account these different perspectives*' (ESG, 2015, p. 5). With this, the ESG obviously, although implicitly, defines quality as a multidimensional and stakeholder-dependent concept as opposed to a one-sided, often ministerial definition of quality. Taking into account the prominent role of stakeholders in the Bologna Process, this conceptual determination does not come as a surprise. At the same time, it establishes the basis of the central role of stakeholders in quality assurance in the EHEA. The AQAF does not include any conceptual approaches to quality in higher education. This might be that, due to the rather homogeneous composition of the authors (all EQAAs), this topic simply did not arise; at least it would be a reasonable speculation. It is interesting, however, in this context that the authors of the AQAF appeared to see the necessity to include a definition of *Self-assessment report* in the glossary but not of more fundamental topics (AQAF, 2016, p. iii). However, an explicit conceptual determination would be necessary to guide the design of the framework.

A similar picture can be drawn regarding conceptual determinations of quality assurance. The ESG gives a general explanation of how this term is used, namely '*to describe all activities within the continuous improvement cycle (i.e. assurance and enhancement activities)*' (ESG, 2015, p. 7). On the one hand, this determination might be called banal but the specification in brackets hints at an important discussion in the EHEA, especially during the early days of quality assurance, which is the different approaches to quality assurance, be they formative or summative, developmental or accountability driven. This becomes even clearer in the statement, '*At the heart of all quality assurance activities are the twin purposes of *accountability* and *enhancement*. Taken together, these create trust in the higher education institution's performance*' (ESG, 2015, p. 5). Again, the specific European background explains the enormous relevance of this statement. In the early days of external quality assurance in Europe, most of the agencies did not have any regulatory power and what is called accreditation today was not the dominating approach. Accreditation quickly spread from Eastern Europe to the rest of the continent, and this created tensions among a diverse group of EQAAs. Hence, silence on the part of AQAF might simply be due to the fact that the authors all came from national accreditation agencies. In any case, the detailed comparison of the two frameworks demonstrates that there is no conceptual difference in this regard.



Standards/Principles and Guidelines/Interpretation and Guidance Notes

Both frameworks give some explanation of what is meant by *Standards* and *Guidelines* and *Interpretation and Guidance Notes* respectively. The ESG are more explicit in this regard as can be shown in Table 2.

Table 2: Explanation of Standards, Guidelines and Interpretation Notes

ESG	AQAF
<p>The <i>standards</i> set out agreed and accepted practice for quality assurance in higher education in the EHEA and should, therefore, be taken account of and adhered to by those concerned, in all types of higher education provision.</p>	<p>As the name suggests, the purpose of the <i>Interpretation and Guidance Notes</i> is to assist users in understanding the scope of the principles in the quadrants and to explain the meaning of some of the terms used (AQAF, 2016, p. 16).</p>
<p>The <i>guidelines</i> explain why the standard is important and describe how standards might be implemented. They set out good practice in the relevant area for consideration by the actors involved in quality assurance. Implementation will vary depending on different contexts (ESG, 2015, p. 7).</p>	

However, even more relevant are the explanations of the concepts of the frameworks in their entirety which allude to the meaning of standards and guidance (see Table 3).

**Table 3: Concept of Standards and Principles in ESG and AQAF**

ESG	AQAF
Scope and Concepts	
<ul style="list-style-type: none"> ■ The ESG are a set of standards and guidelines for internal and external quality assurance in higher education. The ESG are not standards for quality, nor do they prescribe how the quality assurance processes are implemented, but they provide guidance, covering the areas which are vital for successful quality provision and learning environments in higher education (ESG, 2015, p. 4). ■ The ESG are used by institutions and quality assurance agencies as a reference document for internal and external quality assurance systems in higher education. Moreover, they are used by the European Quality Assurance Register (EQAR), which is responsible for the register of quality assurance agencies that comply with the ESG (ESG, 2015, p. 4). 	<ul style="list-style-type: none"> ■ The Framework will serve as a common reference point for quality assurance agencies and higher education institutions as they strive towards harmonisation amidst the diversity of higher education systems, cultures and traditions within the region. The Framework uses generic principles and statements of good practice. It is not prescriptive. Its purpose is to promote good practices for internal and external quality assurance as well as the establishment and implementation of national qualifications frameworks in the ASEAN Member States (AMS). ■ It seeks to provide a common ground and understanding of quality assurance within ASEAN countries. Its generic principles will find resonance on the national level (AQAF, 2016, p. 5).

Both frameworks share the same general concept of standards or principles which defines the nature of the frameworks. The standards or principles are to be understood as reference points, not as prescriptive standards; they are intended to guide the design of quality assurance while acknowledging diversity at all levels. The ESG highlights the relevance of cultural diversity in a different paragraph: 'These purposes provide a framework within which the ESG may be used and implemented in different ways by different institutions, agencies and countries. The EHEA is characterised by its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations. This makes a single monolithic approach to quality and quality assurance in higher education inappropriate' (ESG, 2015, p. 6). This is a clear message on how to use the framework. In the case of the ESG, as mentioned in Chapter 3.2, this led to the omission of standards for 'procedures' to assure applicability in different national settings.

One could argue that the ESG is more prescriptive regarding the methodology of EQA. At first sight the expectations around how to design a procedure, with self-evaluation, peer review, site-visit, published report and follow-up seem clear. But a closer look reveals that some of these are not just methodological aspects but principles such as self-evaluation as the basis for any external evaluation, peer review and transparency through reporting.



One exception in the ESG should be highlighted, which is not widely discussed. As far as the standards and guidelines for EQAAs are concerned, the ESG mentions explicitly that 'The ESG provide the criteria at European level against which quality assurance agencies and their activities are assessed' (ESG, 2015, p. 6). Consequently, for EQAAs, the ESG are more than simply reference points; they carry a substantially higher level of obligation. Nonetheless, the introduction to Part 3 of the 2005 version already stressed that the standards should not be too detailed or prescriptive and should not impact negatively on the ability of EQAAs across the EHEA to '... reflect in their organisations and processes the experiences and expectations of their nation or region...' (ESG, 2005, p. 23). This constitutes the basis, as explained in Chapter 5.2, for the use of the ESG as a compliance tool by EQAR, and for the general concern that the ESG might be seen as a simple checklist.

However, the similarity at conceptual level cannot hide the fact that at operational level substantial differences exist. The first difference to be highlighted is the level of obligation. In case of the AQAF, 'AQAN and its partners (SEAMEO-RIHED and AUN) encourage its members to make use of AQAF as a tool for improvement and harmonisation of the quality assurance system at the national level. The national EQA bodies should strive to align their QA and QF systems to AQAF in due course' (AQAF, 2016, p. 13). As far as the ESG are concerned, it is fair to say that the development of the EHEA, as demonstrated in Chapter 4, resulted in a much higher level of obligation.

These developments in the implementation of the ESG do not compromise the finding of the conceptual similarity but they provide evidence that such frameworks might become living documents once they have been adopted.

Scope

The purposes of the two frameworks clearly limit their scope to education, which means teaching and learning in this case; other missions of higher education institutions are excluded. The references to the broader context and the genesis of the frameworks provide further explanation of the scope. The ESG makes the separation from other missions explicit by stating 'The focus of the ESG is on quality assurance related to learning and teaching in higher education, including the learning environment and relevant links to research and innovation. In addition, institutions have policies and processes to ensure and improve the quality of their other activities, such as research and governance' (ESG, 2015, p. 5).

However, Principle 3.4 AQAF includes 'research, services and management' (AQAF 3.4). According to the *Interpretation and Guidance Notes* to AQAF 3.1, the institutions are expected to implement quality assurance arrangements not only in teaching and learning but also for 'other activities' (AQAF, 2016, p. 28). Also, the *Interpretation and Guidance Notes* to AQAF Principle 3.2 goes beyond teaching and learning. Put into context of the entire framework, these mentions of research and/or other activities do not seem to create a systematic expansion of the scope beyond teaching and learning.

A fundamental difference regarding the scope is the inclusion of a section on NQFs in the AQAF. However, as explained in Chapter 3, this does not constitute a real conceptual difference because the qualifications frameworks in the EHEA were developed in parallel to the ESG and only a very small number of EQAAs had responsibility for them, a fact which has not changed substantially. As already explained, the revision of the ESG created a link to the NQFs as relevant reference points for quality assurance.

Structure

Both the ESG and the AQAF view the various parts of the ESG or quadrants of the AQAF as inter-related (ESG, 2015, p. 9; AQAF, 2016, p. 14). The ESG emphasises, 'It should be kept in mind, however, that the three parts are intrinsically interlinked (...) As a consequence, the three parts should be read as a whole' (ESG, 2015, p. 7). The interrelation of the three parts is close: Standard 3.1 requires agencies to 'undertake external quality assurance activities as defined in Part 2 of the ESG' and Standard 2.1 requires EQA procedures to be designed to 'address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG'. This interwoven structure not only supported the creation of a common understanding of quality assurance, it also, as will be shown in Chapter 5, had a substantial impact on the implementation of Part 1 of the ESG. The AQAF urges EQAAs to minimally reference Quadrants 1, 2 and 3. In Principle 2.2 (AQAF, 2016, p. 23) the Q3 institutional IQA requirements are to be included in the EQA standards. AQAF Quadrant 3 does not call for a cyclical external assessment of the IQA whereas ESG (1.10) requires one. Although the inter-linking of the Q2 to Q3 in AQAF is not as evident as in ESG, in practice EQA is mandatory for accountability, approval and funding of the institutions (Bateman & Dyson, 2018).

Responsibility for and mode of implementation

An interesting and relevant difference between the two frameworks exists regarding responsibility for and mode of implementation. The AQAF includes a separate chapter about implementation whereas the ESG does not address the topic.

It is worth noting that, while both frameworks address in a general way how stakeholders might use the respective parts of the framework, the AQAF focuses only on two actors. Firstly, these are the EQAAs that 'should strive to align their QA and QF systems to AQAF in due course'. Secondly, this is AQAN: 'It is a key function of AQAN, through its advisory role and capacity building activities, to assist its members to align their quality assurance and qualification system with the AQAF principles' (AQAF, 2016, p. 13). AQAF even determines a working structure of AQAN which is the



AQAN Advisory Technical Committee (ATAC), appointed by the Executive Committee, with a broad responsibility:

- to provide detailed guidelines to process application for referencing
- to facilitate and advise referencing
- to provide technical support / consultations
- to provide capacity building
- to monitor and to report AQAF related activities to the Executive Committee
- to review periodically (every 3 years) and make recommendations for improvements to AQAN' (AQAF, 2016, p. 13)

Furthermore, the AQAF determines that EQAAs should conduct self-referencing processes against the AQAF and stipulates guidelines for this process (AQAF, 2016, pp. 14–15).

In the EHEA, the external evaluation of EQAAs is part of the Bologna commitments, as will be explained more in detail in Chapter 5, and there is no 'official' equivalence to the referencing guidelines because an official mandate to conduct external evaluations does not exist. ENQA, which has conducted almost all external evaluations of quality assurance agencies, uses its own [Guidelines for ENQA Agency Reviews](#).

Conclusion

The two frameworks use the same general approaches to lay the foundations regarding the purpose of the frameworks, the underlying principles and the concepts of standards and principles. Smaller differences regarding content and different levels of explicitness do not contradict this finding. The only substantial difference lies in the inclusion of a quadrant for the NQFs as a means for quality assurance agencies in the ASEAN to self-reference against it.



3.1 Analysis of AQAF Quadrant 1 and ESG Part 3 (QA of EQAAs)

Quadrant 1 of the AQAF and Part 3 of the ESG address quality assurance agencies. Both state their purpose as being to ensure professionalism, accountability and integrity of the agencies and that these are visible to their stakeholders (ESG, 2005, p. 23; AQAF, 2016, p. 7)

A superficial comparison of the respective chapters of the two frameworks draws the following picture: Part 3 of the ESG includes seven standards whereas the first AQAF Quadrant lists 10 principles. In some cases, the respective ESG Standards and AQAF Principles address the same subject matter and contain very similar content. In other cases, the content shows substantial differences although the subject matter is the same. Further to this, some ESG standards and AQAF principles do not have an equivalent in the other framework.

The following closer examination reveals a different result, especially when the *Guidelines* of the ESG and the *Interpretation and Guidance Notes* of the AQAF are included in the analysis.

In general, both frameworks use a similar approach and structure by addressing two areas of characteristics of an EQAA, namely:

- The necessary organisational framework to implement external quality assurance procedures in a professional, high quality and ethical way (ESG 3.1, 3.2, 3.3 and AQAF 1.1, 1.2, 1.3, 1.4)
- Necessary policies to facilitate implementation of external quality assurance procedures in a professional, high quality and ethical way (ESG 3.4, 3.5, 3.6, 3.7 and AQAF 1.5, 1.6, 1.7, 1.8, 1.9, 1.10).

A clear allocation of standards and principles to the two groups is not always possible; some overlaps are observed.

Organisational Framework

In general, both frameworks present the same understanding of an EQAA which should be a formally established organisation with a defined mission, be independent, be recognised by competent authorities, and demonstrate accountability.



Both ESG 3.1 and AQAF 1.1 require missions and goals that are made public. An interesting exclusive specific of the ESG is the requirement that EQAAs 'should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis' (ESG, 2015, 3.1). The ESG included this limitation (Standard 3.3 in the 2005 version) to foster professionalisation in the field by excluding organisations with broader or even different missions that might implement external quality assurance procedures only on an occasional basis.

The organisational framework has a crucial legal aspect. Having a clear mission is not enough for an organisation; in addition, the organisation with its mission must be 'recognised' by 'competent public authorities' (ESG 3.2, AQAF 1.2). In doing so, both frameworks locate the responsibility for external quality assurance in the public realm which is to be considered a consequence of generally state-regulated higher education systems and especially regulated degree-systems.

Recognition by the competent authority can be considered as light touch regulation in a publicly regulated higher education system because it does not address the legal nature of the EQAA. This responds to systems where private agencies are recognised. At first sight, both frameworks follow this path and refrain from directly defining the legal nature of an EQAA by merely stating that an agency must have a legal basis without further specifications (ESG 3.2, AQAF 1.2). This provides for any legal nature, be it an association, a foundation, a private company, or statutory or other public body. However, in the *Interpretation and Guidance Notes*, the AQAF limits the possible legal nature to 'a statutory body or unit of a ministry' (AQAF 1.2) which excludes private organisations. This is a substantial difference between the two frameworks. Based on almost 20 years of experience in reviews of EQAAs against the ESG, it is fair to assume that a unit of a ministry would most likely fail to comply with the ESG because of another crucial requirement which is independence. Currently, no successfully reviewed EQAA in the EHEA is part of a ministry, although it is worth saying that many have close links with a ministry and/or are funded by a ministry, e.g. ministries nominating some members of the Board.

The independence of EQAAs or, rather, their autonomous responsibility for their operations and decision-making in external quality assurance procedures without third party influences, features in both frameworks with similar wording (ESG 3.3, AQAF 1.3). At the level of standard and principle respectively, the frameworks refer to autonomy regarding operations and taking decisions as outcome of procedures if applicable.

In the *Guidelines*, the ESG distinguish between organisational independence (mainly legal status), operational independence (definition and implementation of external quality assurance procedures) and independence of formal outcomes as core elements of autonomous responsibilities. The AQAF seems to adopt this concept; at the same time, it states that 'In the ASEAN context, however, it is often difficult to be operationally and financially independent. It is imperative, however, that the accreditation/evaluation decisions are made by the EQAA themselves' (AQAF 1.3). Following the purpose of the *Interpretation and Guidance Notes*, namely 'to assist users in understanding the scope of the principles in the Quadrants and to explain the meaning of some of the terms used' (AQAF, 2016, p. 16), it remains unclear why this statement about operational and financial autonomy, which limits the purpose and usefulness of the *Interpretation and Guidance Notes*, is included. Another principle should be mentioned here in relation to the AQAF, namely

1.4, which requires 'a standard and transparent system for appointing members of the Board'. The *Interpretation and Guidance Notes* do not reveal explicitly why this requirement is emphasised as a principle. But it is obviously relevant to hinder undue influence in the nomination or election of members of the Board.

If one takes into consideration the whole area of organisational framework, it becomes clear that this limited concept of independence is consistent with the enabling of a 'unit of a ministry' to be considered a quality assurance agency because organisational (including financial) independence as well as operational independence might simply not be possible legally if the agency is part of the hierarchy of a ministry. But this raises the (legal) question as to how decisions can be taken autonomously in such a case.

It is worth noting that in the case of the ESG the requirement of autonomy is embedded in a broader concept of autonomy in higher education systems that includes also the HEI: 'Autonomous institutions need independent agencies as counterparts' (ESG 3.3). One cannot overestimate the relevance of the principle of autonomy of HEIs in teaching and learning. This is just one institutional aspect of academic freedom that translates into the first underlying principle for quality assurance in the EHEA, namely 'Higher education institutions have primary responsibility for the quality of their provision and its assurance' (ESG, 2015, p. 6) It is fair to say that the ESG has been designed for higher education systems that are characterised by a significant level of autonomy of the HEIs which makes it challenging to implement it in systems with high levels of ministerial steering, let alone 'exporting' the ESG to systems with substantially different legal and cultural frameworks. It should also be noted that the level of autonomy is not equally high across the EHEA.

Another shared characteristic of the required organisational framework is the involvement of stakeholders in the organisation. The ESG requires 'involvement of stakeholders in their (i.e. the agencies') governance' and emphasises the added value of international members (ESG 3.1) whereas the AQAF is slightly more specific by requiring 'a good and appropriate balance of stakeholders in the Board' (AQAF 1.4). Experience shows that limiting stakeholder involvement to the Board as the core decision-making body would not suffice according to ESG if there are more governance bodies. However, this is not to be considered a substantial difference.

The revision of the ESG in 2015 brought about one additional standard in the context of professional and ethical behaviour which is the requirement to distinguish transparently between EQA activities according to the ESG and other activities. This was a reaction to some agencies adding consultancy activities to their portfolio.

The last organisational aspect addresses resources. Without showing any substantial differences, ESG Standard 3.5 and AQAF Principle 1.7 require sufficient financial and personnel resources including resources for staff development.



Policies

At first sight, this area shows a significant difference between the two frameworks. In the standards Thematic Analysis (ESG 3.4) and Internal Quality Assurance and Professional Conduct (ESG 3.6), the ESG addresses only two specific policies, whereas the AQAF addresses internal management, including internal quality assurance and three more policies in the fields of taking into consideration international developments, collaboration with stakeholders at national and international levels, and informing the public.

Starting from the approach to assure professionalism of EQAAs, the AQAF emphasises some aspects of internal management by setting good governance, transparency and accountability as required principles of policies and management practices (AQAF 1.5), which do not feature in the ESG.

A conceptual difference that, to some extent, might follow from the broader perspective on management on the side of AQAF is how the frameworks address agencies' internal quality assurance. The ESG includes an individual standard for internal quality assurance that requires agencies to 'have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities' (ESG 3.6). The AQAF addresses aspects of internal quality assurance of agencies in various standards. This applies first and foremost in AQAF Principle 1.9 which requires that agencies have 'a reliable system for controlling, auditing and assessing all processes of its operations'. In the *Interpretation and Guidance Notes* to Principle 1.6, the AQAF specifies that 'A continuous quality improvement process is embedded in its management system'. The embedding of internal quality assurance in general management is also visible in the *Interpretation and Guidance Notes* to Principle 1.9, which does not talk explicitly about internal quality assurance of agencies but about 'internal management' in general.

AQAF Principle 1.6, although it does not have an explicit link to the internal quality assurance of agencies, can be subsumed under this theme because it requires EQAAs to keep 'abreast with new developments and innovations in quality assurance as part of its internal continuous improvement system'. This is considered to be a standard feature of internal quality assurance of agencies, especially the review of the quality assurance procedures. Notwithstanding these differences, ESG 3.6 and the various AQAF principles highlight the central importance of internal and external feedback with the aim of improving the agencies' operations and to demonstrate accountability to stakeholders.

The ESG includes some standards that were added to the *Guidelines* in the 2015 revision. One highly relevant aspect is that IQA shall ensure 'that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties', which addresses the fact that in some countries the accreditation authorities do not conduct the reviews but appoint other agencies to do so. Although this looks to be European specific, it should be a natural feature of IQA and be relevant to the ASEAN region. Other aspects such as the requirement that IQA shall guard against intolerance of any kind or discrimination do not necessarily relate directly to IQA but outline the appropriate

communication with the relevant authorities of those jurisdictions where they operate and allow the EQAA to establish the status and recognition of the institutions with which it conducts EQA.

The AQAF sets out an exclusive specific requirement in relation to regular financial audits of agencies (1.9). In practice this does not make a huge difference because most of the agencies in the EHEA are public bodies which must undergo financial audits in any case.

Out of the additional policies only one constitutes a substantial difference between the two frameworks. Standard ESG 3.4 requires agencies to conduct thematic analyses based on the outcomes of their reviews. The *Guidelines* explain the unquestionable relevance of this standard: 'In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts. A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty'. Over the years, this limited concept of thematic analyses evolved into a broader concept including different types of analytical and/or research work done by agencies. Hence today, various kinds of analyses are covered that make use of the vast body of information about higher education institutions and the entire systems, most often to identify areas for improvement at institutional level and at national level; and also regarding the policies used by the agencies. The AQAF does not include such a policy.

The AQAF includes two supportive activities as separate principles, namely:

- AQAF Principle 1.8 requires EQAAs to collaborate with national and international stakeholders
- AQAF Principle 1.10 requires EQAAs to keep 'the public informed of its current policies, procedures, criteria, standards and assessment results'.

In both cases the ESG addresses the topics but not in separate standards. Collaboration with stakeholders is part of the DNA of the ESG. The *Guidelines* to ESG 3.1 require the agencies to define and publish the nature of their collaboration with stakeholders. The ESG specified the collaboration also in Part 2 by requiring the EQAAs to involve stakeholders when developing quality assurance procedures (ESG 2.2), and to consider stakeholder needs in the publication of review reports. As explained in Section 4.2, both frameworks also require the active participation of stakeholders in quality assurance procedures, although at different levels of liability. The ESG emphasises the relevance of stakeholders by including stakeholder involvement in their list of four principles for quality assurance in the EHEA: 'Quality assurance takes into account the needs and expectations of students, all other stakeholders and society' (ESG, 2015, p. 6). Although it may appear that in AQAF 1.8, stakeholders seem to have a less 'proactive' but more receptive role, nevertheless by stating that 'Collaboration at national levels with key stakeholders, e.g., students, institutions, employers, industry, and professional bodies, enables better understanding and support, of quality education and training and acceptance of the outcomes of QA work', this might rather be a question of wording.



Similarly, this is also true for keeping the public informed about policies and outcomes. The ESG subsumes this requirement under ESG 2.3 (publication of external quality assurance processes), ESG 2.5 (publication of criteria) and ESG 2.6 (publication of reports).

In conclusion, the two separate AQAF principles address requirements that are addressed by the ESG under different standards.

Finally, one standard that is specific to the ESG is Standard 3.7, which requires agencies to regularly undergo external review against ESG. It is worth noting that the AQAF addresses this topic, although outside the four quadrants. The AQAF includes a separate chapter about self-referencing of EQAAs against the framework and stipulates guidelines for this process (AQAF, 2016, 14/15). The positioning outside the quadrants makes this a substantially lower obligation for agencies.

Conclusion

AQAF Quadrant 1 and ESG Part 3 demonstrate a generally high level of alignment. Regarding the principles and standards that address EQAAs as organisations, key requirements such as having a defined and published mission, a defined legal status, being recognised by competent public authorities, and having sufficient resources are very similar. Only one substantial difference should be highlighted, which is the independence of agencies and linked to it the legal nature of agencies. This is a crucial standard in the ESG, whereas the AQAF opens the door for units of ministries to be recognised as agencies with all the associated repercussions for organisational independence and independence of decision-making.

Regarding policies, there is extensive alignment between the two frameworks. Although at first sight the AQAF addresses internal management and policies on a significantly broader scale than the ESG, one can conclude that either such policies are addressed in other parts of the ESG or that they address or emphasise the obvious. In any case, they do not contain concepts or requirements that would be contradictory to the approaches of the ESG.

3.2 Analysis of AQAF Quadrant 2 and ESG Part 2 (External Quality Assurance)

AQAF Q2 provides 10 principles that EQAAs in the 10 SEA countries are encouraged to reference and seek alignment with as part of the process to help enhance and harmonise quality assurance in the region with the aim of promoting trust and recognition of national qualifications. Part 2 of ESG provides seven standards which EQAAs are expected to demonstrate compliance with (together with Part 3) to achieve full compliance status.

Aims and Objectives of EQA

AQAF Principle 2.1 is explicit and emphatic that the objective of EQA is to serve the interests of students and society while at the same time recognising the need to reflect national regulations and priorities. These can be and often are conflicting goals for EQAAs. Most EQAAs in Southeast Asia are part of ministries or are public authorities which serve the need for accountability of HEIs to the government which authorise and fund them (Miguel et al., 2023; Bateman & Dyson, 2018). Students still do not play a central role in quality assurance despite their reference in the EQAAs' mandate or mission.

The introductory statement to this quadrant also includes employers which is curiously missing in 2.1 (AQAF, 2016, p. 6). Further, in Q2.3, a broader term, 'stakeholder', is used which, when read together with the illustrative evidence, includes experts, institutions and industry groups but is silent on students, academics, regulators and civil society. The lack of a clear role for students and society (or its proxies) in the development of the principles and in the EQA processes and review means that Principle 2.1 is not well supported. The adaptation of this principle to local context, priorities, values, interests, and laws stated in AQAF (2016, p. 7), may not be in accord with students and society being given high consideration in EQA.

ESG Part 2.2 is less specific and more contextual about what the aims and objectives EQA must serve. It must serve the 'aims and objectives set for it', presumably by the relevant stakeholders in accord with the national regulations and priorities. The *Guidelines* are more informative about the aims – EQA must be clear and agreed to by the stakeholders. The *Guidelines*, however, do support the aims and objectives set by the stakeholders by urging mindfulness of the burden to institutions, the need to support quality improvements, allowing institutions flexibility to demonstrate the improvements and clarity on outcomes and follow-up. This cautionary statement is consistent with ESG's declared purpose of creating a common framework that should be adhered to while recognising and respecting national autonomy.

EQA Standards

Principles 2.1 (who the standards are intended to serve), 2.2 (benchmarking of standards), 2.3 (standards inclusively developed to meet local needs) and 2.4 (transparent, equitable and contextualised) address the EQA standards in AQAF. This comparative analysis does not dwell on the clarity and internal consistency of these statements. Crozier (2020)⁴ provides a detailed analysis of the overlap, duplication, and lack of clarity and consistency between statements and the *Guidance Notes and Interpretation*.

4 An internal report by Fiona R. Crozier which reviewed the four pilot agency review reports based on Quadrants 1 and 2 of AQAF. This report, among others, called for revision of the standards to eliminate overlap and to provide a consistency between the Principles and the Guidance Notes.



Role of Stakeholders in Standards

The ESG encapsulates EQA standards and criteria in defining and designing EQA that is fit for the purpose agreed by stakeholders. It further outlines the basic factors that the standards, criteria and processes must consider – the workload and costs burden and the need to be improvement-oriented (ESG 2.2). The stakeholder's role in designing and improving the EQA is much broader than envisaged in AQAF and includes participation in developing the EQA standards. The ESG includes the stakeholders in the design (and improvement) of the EQA methodology while AQAF offers stakeholder participation in developing the EQA standards.

The EQA Process

Five principles in the AQAF, i.e., 2.4, 2.5, 2.6, 2.9 and 2.10, relate to the conduct of EQA while the ESG has five standards, i.e., 2.3, 2.4, 2.5, 2.6 and 2.7 for similar purposes. These standards and principles cover requirements before, during and after the EQA process is concluded. Both frameworks (AQAF – 2.2; ESG – 2.2 and 2.3) expect the process to be fit for purpose (whether for programme, institution or compliance or enhancement, etc.). However, the ESG Guidelines for Standard 2.2 establish four key factors to keep in mind when designing the process. AQAF is silent on any parameters that should be observed in formulating the process and procedures, leaving this to the national mandates, missions and practices in each member state.

The ESG, in addition to the EQA implementation process, pays particular attention to the peer reviewers, their reports and the criteria for the outcomes or judgements. The implementation process requires a self-assessment, external assessment which normally includes a site visit, a report of the findings, outcomes and follow-up. It is interesting to note that in the 2005 version, the entire EQA process was expressed as an expectation (EQUIP, 2015). However, in the revised 2015 version, only the site visit may be subject to variations. AQAF, on the other hand, expects (but does not require) a self-assessment report (SAR), a site visit, feedback, a formal decision and follow-up. The role of peer assessors is expressed in Principle Q2.7. Unlike the ESG, the AQAF prescribes how the SAR should be generated (*Interpretation and Guidance Notes* to Q2.5). The ESG, in the *Guidelines* to Standard 2.2, opens the way for more targeted EQA for institutions that have demonstrated compliance and effectiveness of their IQA systems.

Both the ESG and the AQAF require that the process be fair, reliable, pre-determined, consistent, transparent and published. AQAF adds a time frame criterion to the process, probably reflecting on the need for timely conclusion to the EQA in the region. ESG 2.3 provides added emphasis on follow-up actions to examine institutional actions taken pursuant to the EQA outcomes. On

external peer assessors, AQAF (2.7) focuses on training and ethics to ensure objective and fair EQA. The ESG (2.4), while addressing the need for trained and competent peer experts and a student member, also invokes the need to include experts from different backgrounds for multiple perspectives. A no conflict-of-interest policy in the ESG ensures independence of the experts. Both frameworks require a complaints and appeals process to address issues and review the EQA outcomes (ESG 2.7 and AQAF 2.8 & 2.10).

ESG Part 2.5 and 2.6 call for the criteria for assessment outcomes – judgments, conclusions, findings etc. – to be explicit and published. ESG 2.6 goes beyond transparency of criteria and format to require that assessment reports are accessible to users and stakeholders including decisions resulting from the reports. ESG 2.6 goes beyond the perfunctory need for reports to be clear, readable and concise into the report structure. AQAF 2.6 and 2.4 require that the report templates, EQA standards and procedures are widely disseminated. It is silent on public access to assessment reports and the outcomes, reflecting the current practice in most ASEAN Member States. Only the assessment outcomes are publicly reported and accessible.

Both ESG (2.7) and AQAF (2.10) recognise the rights of the institutions to seek redressal for assessment outcomes which are not based on sound evidence, inconsistent application of standards or misapplication of standards. In addition to the appeals process, the ESG (2.6) also requires a complaints process to allow institutions to raise issues and concerns with the conduct or misconduct of the EQA. In contrast, the AQAF (2.9) calls for cyclical review of EQA activities using feedback from stakeholders. This is not a complaint process and should rather be seen as a part of IQA of EQAAs which might belong to Quadrant 1 of AQAF.

Conclusion

Both AQAF Quadrant 2 Principles and ESG Standards in Part 2 are substantially similar notwithstanding some key dissimilarities which include the active role of students on accreditation panels in the EHEA, the extent of public transparency about the assessment reports and in the scope of the accreditation, i.e. whether focused mainly on teaching and learning or extending to research and community services. Otherwise, the ESG Standards in Part 2 and AQAF Quadrant 2 Principles are highly comparable. The key differences noted reflect the developmental stage of both EQAAs and HEIs in ASEAN and the level of transparency in higher education governance.



3.3 Detailed Comparison of AQAF Quadrant 3 and ESG Part 1: Internal Quality Assurance

Introduction

Part 1 of the ESG and Quadrant 3 of the AQAF address internal quality assurance in HEIs. Both contain statements regarding purpose insofar as a supportive framework is provided to assist HEIs in developing their own systems and processes to enable the assurance and improvement of quality and to provide reliable information about this to their stakeholders and to the public at large (ESG, 2005, p. 13; ESG, 2015, p. 7; AQAF, 2016, p. 9).

A superficial comparison of the respective chapters in the two frameworks draws the following picture: both Part 1 of the ESG and the AQAF Q3 include 10 standards/principles. It should be noted that, in the case of the ESG, this was an increase in standards from the original version in 2005. The reason for this increase was to emphasise further a fundamental principle that is common to both the ESG and the AQAF, that is that quality of education and its assurance is primarily the responsibility of the HEIs themselves (ESG, 2015, p. 6; AQAF, 2016, p. 9).

In some cases, the respective ESG Standards and AQAF Principles address the same subject matter and contain very similar content. In other cases, some Principles in Q3 of the AQAF appear as overarching principles for the regional framework in the Introduction of the ESG (a good example of this has been stated in the first paragraph above: Principle 3.1 of the AQAF states that the institution has primary responsibility for quality. Another example is Principle 3.4 regarding a quality culture). Thus, it may seem, at first sight, that some ESG Standards and AQAF Principles do not have an equivalent in the other framework, but closer reading reveals a different view especially when including the *Guidelines* of the ESG and the *Interpretation and Guidance Notes* of the AQAF as well as the introductions to both frameworks in the analysis.

Themes

In general, both frameworks use a similar approach and structure by addressing four key themes in relation to internal/institutional QA (NB: Many of the standards cut across the four topics in the case of both frameworks, showing the interlinked nature of an effectively functioning IQA system):

i Internal QA is the lynchpin between all the Parts of the ESG and all Quadrants of the AQAF

The introduction to Q3 of the AQAF (28) states that the importance of IQA has, ‘... almost become a mandatory standard in many EQAAs’ quality assurance standards’, and in Principle 3.1 (Guidance notes, pp. 28–29) explicitly states that the EQAA has been established to ensure that institutional responsibility for quality is undertaken effectively. Similarly, the ESG set out a specific standard in Part 2 (Standard 2.1) that requires EQAAs to examine the internal QA systems and processes of institutions: ‘External quality assurance in Part 2 recognises the standards for internal quality assurance in Part 1 thus ensuring that the internal work undertaken by institutions is directly relevant to any external quality assurance that they undergo’ (ESG, 2015, p. 9)

ii The importance of top-level support for IQA and adequate institutional resource

Both the ESG and the AQAF are clear in their insistence that internal QA is not merely a matter for the unit responsible for its operation and/or administration but that support and promulgation from the senior management, together with an expectation that all staff are aware of the system and its processes and their roles and responsibilities within the system, should be built into the system itself. Both frameworks link this to institutional level strategic direction and planning and to institutional allocation of resources, although with a different emphasis (see below). Both frameworks also stress the importance of the involvement of internal and external stakeholders in the development and operation of the IQA system.

In the case of the ESG, these topics are to be found in Standards 1.1, 1.6 and 1.7. In the AQAF, Principles 3.1, 3.3, 3.4, 3.6 and 3.7 are relevant.

ESG Standard 1.1 is specific to the development of an institutional quality policy. Although the AQAF does not specifically refer to such a document, nonetheless, Principle 3.1 is a detailed one and makes links to institutional planning and resources. The concept of a quality culture is also to be found in ESG 1.1, whilst in the AQAF it merits its own principle (3.4). The ESG gives prominence to institutional collection and use of data and information gathered through the IQA system, again stressing the link between data and decision-making. Whilst there is mention in the AQAF of dialogue with stakeholders that is likely to lead to changes (3.3), quality indicators (3.4), feedback mechanisms (3.6 and 3.8) and the need for continuous improvement (3.9) nonetheless, the notion of formal collection and use of data is more implicit in the AQAF.

AQAF Principles 3.3 and 3.6 stress the importance of the involvement of all levels of staff in the IQA system and the need for shared responsibility for IQA; in that respect,



there is much similarity with ESG 1.1. Principle 3.6 of the AQAF particularly highlights the role of senior management in the promulgation of the IQA system.

The topic of resource raises an interesting difference between the ESG and the AQAF: both frameworks have a standard/principle specific to the need for adequate resourcing. However, ESG 1.6 refers to the role of IQA in assuring adequate resources for teaching and learning activities, whereas Principle 3.7 of the AQAF focuses on adequate resourcing of the IQA system itself. The Guidance Notes of Principles 3.5 and 3.6 also appear to underline the importance of adequate resourcing of the IQA system, although Principle 3.5 strongly promotes the engagement of all staff in IQA processes, thus underlining the importance of shared responsibility (and thus human resources) across the institution. This difference may be relevant in indicating the state of play of internal quality assurance at the current time in both regions: institutions in the EHEA have been discussing the topic for 20 years. IQA is an embedded feature of academic administration in some form or another at most HEIs. In ASEAN, the implication is that the importance of the role of IQA and the need for a formal location and resourcing for the function is not yet fully recognised.

iii**The importance of formal and consistent processes to support the IQA system**

Both the ESG and the AQAF underline the importance of formal, transparent and consistently applied systems and processes in relation to IQA. Very often these formal processes overlap with themes ii) and iv) in that they specifically include external as well as internal stakeholders in the IQA systems and processes.

In the case of the ESG, these topics are to be found in Standards 1.1, 1.2, 1.4, 1.5, 1.7 and 1.9. In the AQAF, Principles 3.5, 3.8 and 3.9 are relevant.

The very first ESG Standard (1.1) uses the concept of the Quality Policy to underline the need for 'appropriate structures and processes' and the *Guidelines* for this standard reinforce the 'formal status' of the QA Policy and all that it entails. It states that, 'The policy translates into practice through a variety of internal quality assurance processes' which in some contexts will be subsumed under the policy itself and in others may be separately published in a QA handbook or manual. Whilst there is no specific principle in the AQAF that focuses on Quality Policy, Principle 3.5 and the associated Guidance Notes effectively set out a similar set of characteristics for any institutional IQA system.

The ESG then goes on to reinforce the idea of the need for a formal, transparent and consistently applied process in a number of standards, relating to approval of programmes, student admission, teaching staff, the collection of data and the monitoring and review of programmes (Standards 1.2, 1.4, 1.5, 1.7 and 1.9). This is matched in part in the AQAF by Principle 3.8 which deals with the approval, monitoring



and review of programmes. At first glance, the ESG would appear to be much more detailed (or even prescriptive) in their approach to the need for formal processes. However, it should be noted that, although the content of the two versions of the ESG (2005 and 2015) did not differ substantially, a decision was taken during the drafting of the second version of the ESG in 2015 to ensure that all phases of the student lifecycle are covered by the IQA system. This also impacted on the order of standards as an effort was made to provide a logical sequence through that lifecycle. This is the reason for the specific standards about, for example, student admission, progression, recognition and certification (1.4) and teaching staff (1.5). The AQAF, on the other hand, has a stronger focus on the development and implementation of the IQA system overall and its institutional importance.

In addition, the AQAF sets out, in Principle 3.9, the need for a formal process to monitor and review the IQA system itself in order that it is continuously improved, although this is somewhat clouded by the fact that the principle itself refers to quality and not quality assurance. It may be that the Guidance Note is suggesting that, in order to continue to assure quality, the IQA system itself must remain under scrutiny, but this is not clear. In any case, the ESG has no direct equivalent. However, Standard 1.10, which states that institutions should regularly undergo external QA in line with the ESG on a cyclical basis, ensures that the IQA system as a whole is regularly reviewed. Nevertheless, it is interesting that for the AQAF this is an explicitly internal function (although EQAAs are mentioned in Principle 3.1), whilst in the ESG any internal responsibility is implicit and any external input is explicit (ESG 1.1: 'How the policy is implemented, monitored and revised is the institution's decision').

iv**A duty to involve and inform stakeholders and the general public**

As can already be seen in the preceding paragraphs, the importance given to the involvement of internal and external stakeholders in the IQA system and the need to provide information to the public about its outcomes cannot be underestimated in both frameworks. Neither has a specific standard or principle about the involvement of stakeholders, and instead we find references throughout the frameworks. Both frameworks contain a standard or principle specific to public information.

In the case of the ESG, these topics are to be found specifically in Standards 1.1, 1.2, 1.8, 1.9 and 1.10. In the AQAF, Principles 3.2, 3.3, 3.8 and 3.10 are relevant. However, they are pervasive in both frameworks.

The centrality of the involvement of stakeholders is immediately apparent in ESG 1.1 where the Standard explicitly states that the Quality Policy should be developed and implemented by internal stakeholders 'while involving external stakeholders'. The Standard also explicitly states that the Quality Policy should be made public. Principle 3.3 of the AQAF explicitly states that, 'quality assurance is a participatory and cooperative process incorporating the involvement of academic staff, students and



other stakeholders'. The Guidance Notes provides further information on why the involvement of stakeholders is important and who the external stakeholders might be.

Although not explicitly stated in either framework, it is implicit that external discipline expertise is crucial in the processes for the approval, monitoring and review of programmes (ESG Standards 1.2 & 1.9 and AQAF Principle 3.8). However, the ESG Standards are more detailed in suggesting that, as well as 'external expertise', there should be involvement of 'students and other stakeholders' in such processes. AQAF 3.8 refers to external stakeholders only in the Samples of Evidence column. It should be noted at this point that the 2015 revision of the ESG took the deliberate stance of placing students in a much more central role in both internal and external QA (see ESG, 2015, p.6; Context, scope, purposes and principles). It is, therefore, not surprising to find that students are explicitly mentioned more frequently than in the AQAF.

In particular, this refers to the centrality of students in the learning process and their involvement in IQA processes. In relation to the former, Standard 1.3: Student-centred learning, has not yet been mentioned in this section as it has no real counterpart in the AQAF Q3. Rather the interests of students are referred to in Q2 of the AQAF (EQA). Similarly, student support is more explicit in the first part of the ESG. Standard 1.3 is about the students' active role in their learning; the AQAF's focus is rather on their involvement in IQA processes.

In relation to public information, it is interesting to note that the AQAF has a specific Principle (3.2) in relation to the need for public accountability – this concept is found in the introductory 'Context, scope, purposes and principles' section of the ESG (7). Standard 1.8 of the ESG and Principle 3.10 of the AQAF both explicitly refer to the need for public information about the institution, its programmes, graduate employment information, etc.

Conclusion

ESG Part 1 and AQAF Quadrant 3 demonstrate a generally high level of alignment. The ESG reflect more explicitly themes that had risen on the high education agenda since 2005. In particular, this refers to the centrality of students in the learning process and their involvement in IQA processes and student support. This point proves to be the one substantial difference between Part 1 of the ESG and Quadrant 3 of the AQAF.

On the other hand, the AQAF sets out a specific Principle (3.9) in relation to the monitoring and review of the IQA system itself.

Apart from these two main areas of difference, in scope and principle, a high level of alignment across the two frameworks is evident.



3.4 Overarching Conclusion on the Comparison Study

The detailed comparison of Quadrants 1–3 of the AQAF and Parts 1–3 of the ESG reveals that, despite some expected differences, due to regional context, there is a high level of alignment between the two frameworks. Key differences lie in the role of the stakeholders (stronger in the ESG) and the focus on the QA systems/processes themselves (AQAF, with the ESG focusing more on the impact on the quality of teaching and learning and student support).

The key is alignment at the level of principle, which is the level at which stated aims of harmonisation, trust and mobility etc. are likely to be supported. Together with **many similarities at the level of policy and process**, it is possible to say that **there is substantial alignment between the two existing frameworks** and that it would not necessarily be a good use of resources to carry out further work in this area. Indeed, such work could be counter-productive, given the extent of alignment at the level of the principles. As will be shown in Chapter 5 and later in the recommendations, implementation of the framework offers more opportunities for intra and inter-regional impact of both frameworks.

Regarding the individual Standards and Principles, the level of alignment is very high. The only substantial exceptions are:

- Independence of EQAAs and their legal nature: This is a crucial standard in the ESG, whereas the AQAF opens the door for units of ministries being recognised as agencies with all the associated repercussions for organisational independence and independence of decision-making.
- External evaluation of EQAAs: The ESG requires independent evaluation of the agencies, whereas the AQAF, although not included in the four quadrants, suggests self-referencing by the agencies which constitutes a significantly lower level of obligation.
- Students in EQA: It is central for the ESG that students serve as panel members with the same rights as other members. This role is not required by AQAF.
- Students in the learning process: The concept of student-centred learning and thus the emphasis of the student's active involvement in IQA processes and student support has developed as a core element since the revision of the ESG 2015. The AQAF does not provide an equivalence.



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- Publication of reports: The publication of review reports is another central requirement of the ESG whereas this is not the case in the AQAF.
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- Internal review of internal quality assurance: The AQAF sets out a specific Principle (3.9) in relation to the monitoring and review of the IQA system itself which does not have an equivalent in the ESG.
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4

AQAF and ESG, their Implementation and Impact: Analysis, including Information Received through Stakeholder Interviews

- 4.1 Introduction
- 4.2 The ESG
- 4.3 The AQAF
- 4.4 Conclusion



4.1 Introduction

In this chapter, the implementation of the AQAF and the ESG, including the pace, comprehensiveness, and success factors are analysed. Furthermore, what impact the implementation of both frameworks has had on quality assurance, and their impact beyond their primary purpose to guide quality assurance, is examined. For the analysis of the implementation, the natural source for both is grey literature emerging from various regional sources. In addition, a series of focus groups/interviews with key stakeholders (HEIs and students, ministries, EQAAs, ENQA, EQAR, and employer representatives) were carried out.

4.2 The ESG

Sources

Many of the sources utilised in this chapter in relation to the ESG come from the Bologna Process, such as the official *Bologna Process Implementation Reports* (until 2009, called the *Bologna Stock-taking Report*) which analyse progress against the various Bologna priorities for reporting at the ministerial meetings; the *Bologna with Students' Eyes* - reports by ESU (previously ESIB), and the *Trends Reports* by EUA. The latter covered broader topics but were timed to influence the ministerial meetings. This material will be complemented by material from other stakeholders and research literature. The data from external evaluations of quality assurance agencies based on the ESG are of highly relevant as will be shown.

The ESG has frequently been called a success story of the Bologna Process. At the same time, it is fair to say that research literature about its implementation and impact is scarce. The Bologna Process and quality assurance in general have been researched broadly but the specific role of the ESG has hardly been analysed in detail.

One preliminary remark is that the volume of available empirical information and analyses differs substantially between the three parts of the ESG, with a high level regarding external quality assurance (Parts 2 and 3) and a lower level regarding internal quality assurance (Part 1). This is particularly true for the *Bologna Process Implementation Reports* which provide standardised information about the implementation of external quality assurance over the years but lack consistent indicators for IQA which is not addressed explicitly in every report. However, the specific structure of the ESG helps to overcome this imbalance. Standard 3.1 requires agencies to 'undertake external quality assurance activities as defined in Part 2 of the ESG' and Standard 2.1 requires external quality assurance procedures to be designed to 'address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG'. Consequently, an EQAA will only be evaluated positively if it implements Part 2 appropriately and this again means that the methodologies used by the agency will almost directly evaluate the implementation







of Part 1 at the higher education institutions. Therefore, the implementation of EQA also gives at least some indication of the implementation of Part 1 of the ESG. The indicators used in the *Bologna Process Implementation Reports* utilise this: The scorecard indicator is named 'Stage of development of external quality assurance system, 2022/2023' whereas the definition of the highest level of compliance refers to the national quality assurance system as a whole: **'A fully functioning quality assurance system is in operation nationwide, in which all higher education institutions are subject to regular external quality assurance by an agency that has successfully demonstrated compliance with the Standards and Guidelines for Quality Assurance in the EHEA (ESG) through registration on EQAR'** (Definition of category 'green' in the *Bologna Process Implementation Report 2024*; European Commission / EACEA / Eurydice, 2024, p. 79). This also demonstrates that agency reviews have an impact on the implementation of the entirety of the ESG that cannot be overestimated. Consequently, positive agency reviews can be taken as a proxy for the implementation of the ESG in general.

Implementation: State of Development

The *Bologna Process Implementation Reports* demonstrate that the level of implementation of the ESG is reasonably high; progress over the years shows that, by 2023, 42 out of 49 countries had quality assurance systems in alignment with the ESG. The development is summarised in the following table, based on the *Bologna Process Implementation Reports 2009–2024*:

	Countries	Green	Yellow	Orange	Red
2024	49	33 (67.3%)	9 (18.4%)	7 (14.3%)	0
2020	50	36 (72%)	6 (12%)	7 (14%)	1 (2%)
2018	50	34 (68%)	3 (6%)	11 (22%)	2 (4%)
2015	48	25 (52.1%)	17 (35.4%)	6 (12.5%)	0
2012	47	24 (51.1%)	17 (36.2%)	6 (12.8%)	0
2009	28 countries reported that the national systems had been reviewed, and three countries reported that only the agencies had been reviewed.				



-  A fully functioning quality assurance system is in operation nationwide, in which all higher education institutions are subject to regular external quality assurance by an agency that has successfully demonstrated compliance with the Standards and Guidelines for Quality Assurance in the EHEA (ESG) through registration on EQAR.
-  A fully functioning quality assurance system is in operation nationwide, but only some higher education institutions are subject to regular external quality assurance by an agency that has successfully demonstrated compliance with the ESG through registration on EQAR.
-  A quality assurance system is in operation nationwide but has not yet been fully aligned to the ESG.
-  No quality assurance system is in operation.

NB: Until 2020, Green was divided into dark green which was the same as green in 2024 and light green, which was the same as green, but the agency was not listed in EQAR. This differentiation is not relevant for this report.

The information from the 2009 Report demonstrates that these reports are to be treated carefully. The differentiation between reviewed systems and reviewed agencies is not clear because the review of an agency includes Part 1 as explained previously. Furthermore, data about agency reviews from the ENQA website tells that by late autumn 2008, agencies from 15 out of 46 countries were reviewed successfully. This would mean that only around one third would qualify as 'green'.

The implementation of the ESG was not a steady process and it differed from country to country. Without doubt, it started dynamically. The fact that within four years of the adoption of the ESG one third of the countries had their agencies successfully reviewed demonstrates a remarkable pace. The dynamic continued with an additional 10 agencies within the next three years. However, the dynamic start to the implementation was not taken for granted. The 2005 version of the ESG is described as a report, an indication of how its authors believed it would be received at this time. This was to be proved wrong in the rapid adoption and implementation of the Standards and Guidelines in diverse ways across the countries of the EHEA. The 'report' saw itself as, '...no more than a first step in what is likely to be a long and possibly arduous route to the establishment of a widely shared set of underpinning values, expectations and good practice in relation to quality and its assurance...' (ESG, 2005, p. 5), Whilst the journey can rightly be described as long, in that it is without a final destination, the enthusiastic adoption of the ESG in national contexts might not now be described as 'arduous'.

The revision of the ESG in 2015 has frequently been called a turning point in the implementation of the ESG. Understandably, the revision slowed down the development of quality assurance arrangements because alignment was now required against the new version; as one example, agency reviews were suspended, which explains the significant increase in reviewed agencies from 25 to 34 by 2018. Since then, a plateau has been reached with slightly more than two-thirds of countries having their agencies successfully reviewed.

By 2024, 223 external evaluations of EQAAs had been carried out which means that some agencies have already been evaluated four times, some of which will latterly have been through the new targeted review method which is applicable to those agencies that have been successfully reviewed at least twice against the ESG and which offers an alternative, more enhancement-focused approach to the review.

By 2015, it had already become clear that the pace of implementing the ESG differs between better developed systems and those that are either nascent or in stagnation, which is still valid today (European Commission / EACEA / Eurydice, 2015, p. 99). It is fair to say that the implementation was slow in some countries. In 2018, ministers committed 'to removing the remaining obstacles to their implementation in national legislations and regulations' (Paris Communiqué, 2018, p. 2).

The *Bologna Process Implementation Reports* do not provide separate standardised information about the implementation of Part 1 of the ESG, if at all. In 2010, EUA reported EUA's Quality Culture project revealed that more than half of the institutions implemented internal quality assurance arrangements after the adoption of the ESG and more than two-thirds responded that they follow the national regulations, which in many cases are built on the ESG (Loukkola & Zhang, 2010, p. 23). Fonseca assumed in 2015 that 'probably every HEI has in place procedures and processes - that can be recognised as internal quality assurance systems (IQAS)' (Fonseca, 2015, p. 14) and the 2024 QA-FIT report by EUA and EURASHE, based on surveys among their members, reveals a high level of implementation (EUA & EURASHE, 2023, pp. 10 & 13).

Implementation: Success Factors

Embedding in the Bologna Process: Undoubtedly, one of the most important success factors is the embedding of the ESG in the broader framework of the Bologna Process. Quality assurance is one of the three key commitments of the Bologna Process and has therefore been high on the agenda since the second Ministerial Meeting in 2003 in Berlin. Every Ministerial Communiqué has confirmed the relevance and included new goals regarding quality assurance in a broader sense and regarding the implementation of the ESG. Whereas the Ministerial Communiqués of 2003 and 2005 put quality assurance at the top of the agenda as explained above, the communiqués that followed confirmed the relevance of the ESG as 'powerful driver of change in relation to quality assurance' (London Communiqué, 2008, p. 8) and its 'essential' role in building trust (Bucharest Communiqué, 2012, p. 2; Paris Communiqué, 2018, p. 1). Since 2012, the focus started to slowly shift away from questions of implementation (although still relevant) to the role of the ESG and quality assurance in general for pushing through other priorities and implementing other Bologna instruments. In 2012, ministers requested more coherence of the instruments, and in 2015, slow implementation of the idea of higher education institutions being able to choose any quality assurance agency listed in EQAR was highlighted (Yerevan Communiqué, 2015, p. 5) which was reiterated in 2024 together with the slow implementation of the European Approach for Quality Assurance of Joint Programmes (Tirana Communiqué, 2024, p. 51). Consequently, the implementation of the ESG has been an item in the *Bologna Process Implementation Reports* since the beginning.



More specifically, the working method of the Bologna Process in general can be called a success factor. The regular analysis of the state of development in preparation for the regular ministerial meetings provided comparable information and especially the traffic light system to present the progress turned out to be effective because ministers prefer to travel to ministerial conferences with as many green traffic lights in their luggage as possible! Therefore, the ministers of the Bologna signatory countries were important drivers in the implementation of the ESG, and that there was an important role for EQAAs to ensure that the importance of the ESG was well understood at national level.

A specific aspect of the embedding is the ESG's role in implementing other Bologna priorities. From the outset even more so since the revision of the ESG in 2015, priorities such as the implementation of the QF-EHEA and ECTS, student involvement, recognition of qualifications according to the Lisbon Recognition Convention, student-centred learning, etc. are mentioned in the ESG which created for them the role as a tool for implementation of Bologna commitments. In the *Bologna Process Implementation Report 2020* this was called the 'third wave' of development of quality assurance, 'notable for the development of the overall quality assurance framework and a closer integration of quality assurance with other related issues – including automatic recognition, a closer link to the EHEA qualifications frameworks, and the adoption of the European Approach for Quality Assurance of Joint Programmes' (European Commission / EACEA / Eurydice, 2020, p. 89). This development, which can also be found in other regions of the world (Uvalić-Trumbić & Martin 2021, Chapters 3.3 and 3.4), risks moving the focus away from quality in higher education, but it clearly also gave the implementation of the ESG additional relevance. Consequently, the E4 called for caution when preparing the revision of the ESG.

Finally, the legal nature of the Bologna Process as a voluntary process which is built on self-commitment was an important success factor. Since the inception of the Bologna Process, the point at which national authorities began implementation, details of the implementation of Bologna agreements and hence of the ESG rested within the prerogative of national ministries and of stakeholders. This point was also strongly endorsed by those attending the focus groups, with agreement that the voluntary nature, coupled with a balance between trust and freedom, was central to successful implementation. Voluntary implementation was also important because alignment with national priorities was of the utmost importance (Beerrens, 2015; Hopbach, 2012; Hopbach, 2014). During the interviews, representatives confirmed alignment with national priorities and the importance of political will to embed and implement the ESG.

Stakeholder ownership: As explained previously, the development and even more so the revision of the ESG mark the foundation of the close collaboration of the E4 who are, despite the formal adoption by the ministers, the primary owners of the ESG. For the HEIs, demonstrating ownership and implementation is an important means to keep a certain level of control over a development whose importance cannot be overestimated. In the *Trends 2010 Report*, EUA presented the outcome of a survey: 'At the institutional level, the most important change during the first decade of the 21st century was identified as the development of internal quality assurance processes' (Sursock & Smidt, 2010) which was confirmed in the 2015 version (Sursock, 2015, p. 38). For students, the ESG has always played an important role as vehicle to push through a broader agenda. The revision of the ESG in 2015 and the statements of ESU in preparing for the current 2025 revision

provide evidence that they continue to understand the ESG as tool to implement their priorities such as student participation in higher education governance, student-centred learning, social dimension of higher education, mental health of students, etc. During the interviews, this was confirmed, and it became clear that, for students in particular, involvement in the development of the ESG had given them a voice which has led to the development of quality assurance systems that are more comprehensible and in which they have a role.

However, one E4 partner stands out regarding the meaning it attributes to the implementation of the ESG and that is ENQA. A successful review against the ESG is the precondition for membership. Naturally, therefore, ENQA is interested in a high level of implementation. Indeed, there was agreement at the focus groups that the impact of the ESG would be weaker if there was no peer review of agencies.

Hence, it did not come as a surprise when EUA as one of the owners concluded, 'To ensure more effective implementation and commitment, it is critical that the ownership of the ESGs continues to rest with the stakeholders' (Sursock & Smidt, 2010, p. 7).

The ESG has an even higher relevance for another stakeholder: EQAR. Without agencies successfully reviewed against the ESG there would be no Register.

In conclusion, the main stakeholders have a vital interest in the implementation of the ESG. Furthermore, other powerful actors attribute high relevance to the implementation. Hence, core stakeholders in addition to the ministers are important drivers in the implementation of the ESG.

Evaluation of EQAAs: Although closely linked to the role of ENQA and EQAR for the implementation of Part 3 of the ESG, the evaluation of EQAAs can be highlighted as a success factor for implementing Part 1 of the ESG. As mentioned in the introduction to this chapter, the importance of compliance with the ESG for agencies for inclusion in EQAR and for membership of ENQA means that the preparation for an external review against the ESG requires agencies to align their methodologies with Part 2 of the ESG. As explained before, the interwoven structure of the ESG leads naturally to the requirement for higher education institutions to implement Part 1 of the ESG in order for national agencies to successfully pass their external reviews. The impact of agency reviews on the implementation of the entirety of the ESG cannot be overestimated.

Nature of the ESG: An important success factor for the implementation of the ESG lies without doubt in their nature. From the outset, as mentioned in the introduction to this chapter, the ESG has been principle-based as opposed to rules-based standards. The Standards describe what has to be done but do not prescribe how. The principle-based approach facilitated the ESG's adaptability to different approaches to quality assurance. This is especially true for internal quality assurance but also for external quality assurance, which may address programme level or institutional level, with or without legal consequences of the reviews, etc. This adaptability was not just emphasised by design but also by intention; it made it possible to implement the ESG in a great diversity of national, legal, cultural and political frameworks for higher education. As a result, quality assurance in the EHEA has always been characterised by a significant great diversity of procedures and by dynamic developments as ENQA found out in various analyses



(Costes et al., 2008; Grifoll et al., 2012; Hopbach & Flierman, 2020). Whether or not there has ever been a movement towards external quality assurance approaches at institutional level (European Commission / EACEA / Eurydice, 2012, p. 6) as one might have expected because of the interwoven structure of the ESG is not to be discussed here. But most likely the dynamic situation of constant change will continue, and as explained before, national policies and priorities change, and quality assurance frameworks follow.

The adaptability of the ESG has always unanimously been considered as an important strength of the ESG by all stakeholders (Bologna Process Implementation Report, 2012). In this context, the decision of the authors not to include standards and guidelines for procedures has proven to be not only right but of the utmost importance. The interviews demonstrated the view that implementation was possible across such diversity and at such a pace because the benefits were obvious and because the ESG provides a non-prescriptive framework within which the national context can develop and maintain its own systems.

An interesting (and ongoing) discussion in this context emerged during the preparation for the revision in 2015 which is the criticism of too rigid an interpretation that is compliance-oriented and limits the leeway offered by the ESG. The E4 concluded in 2012 that 'The European quality assurance landscape has changed considerably in recent years. Moreover, the creation of EQAR with its specific mission and use of the ESG as a compliance tool has brought additional pressure to bear in considering whether the ESG can serve the purpose for which they are being used. (...) Care should be taken to make sure that the European Standards and Guidelines do not become a simple checklist for compliance purposes and that any revisions reflect the needs of higher education more broadly' (MAP-ESG, 2011, p. 3). This was reiterated in 2020: 'Many of the current key challenges linked to the use of the ESG are related to the interpretation of the ESG and its individual standards. The interpretation is often too restrictive and the scope for going beyond the standards is not exploited. Further, some misunderstandings prevail.' (Rome Ministerial Communiqué, 2020, p. 7). In fact, this criticism even made its way to the ministerial level. The Rome Ministerial Communiqué reads: '...we encourage an enhancement-oriented use of the ESG to support innovation in higher education and its quality assurance' (Rome Ministerial Communiqué, 2020, p. 7).

Developmental stage of quality assurance: It is fair to say that at the time of the adoption of the ESG, quality assurance was well developed in only a limited number of countries of what was to become the EHEA (Sursock, 2012). At that time another success factor was a combination of the early stage of development of quality assurance in many countries, the guiding nature of the ESG, and not least a huge momentum in the Bologna Process which pushed the development of internal quality assurance as confirmed by EUA and the external quality assurance, as the number of agency reviews demonstrates.

Support measures: Quality assurance and the implementation of the ESG have been high on the political agenda in the countries of the EHEA, although with variations. A wide range of supportive activities had already begun at an early stage.

First and foremost, the activities of the key stakeholders should be mentioned. This report focuses



on activities at the European level. Systematic information about supportive measures of national associations of higher education institutions, student associations and quality assurance agencies are not available. At European level, it is no surprise that the stakeholders collaborating in the E4 group have been supporting the implementation of the ESG since their adoption, jointly as well as separately.

These activities cover analytical work, mainly analyses to identify challenges and to promote good practice. In joint projects, the E4 conducted analyses that were also aimed at preparation for the revision of the ESG in 2015 and for the current revision, namely the MAP-ESG Project 2010–2012 (<https://www.enqa.eu/projects/map-esg/>) and the QA-FIT Project 2022-2024 (<https://www.enqa.eu/projects/quality-assurance-fit-for-the-future-qa-fit/>). Furthermore, the organisations implemented separate projects focusing on their own constituencies, however, this was usually done with participation of the other E4-partners such as:

- SEQA-ESG 1 and 2 (Supporting European QA Agencies in Meeting the ESG (SEQA-ESG); 2019–2025: <https://www.enqa.eu/projects/supporting-european-qa-agencies-in-meeting-the-esg-seqa-esg-ii/>)
- SPEAC by ESU (Sharing Practice in Enhancing and Assuring Quality; 2011–2013: <https://esu-online.org/projects/sharing-practice-enhancing-assuring-quality-speaq/>)
- QA LEAD by EURASHE (Equipping institutional leaders to maximise gains from quality assurance; 2019–2022: <https://www.eurashe.eu/project/qalead/>)
- EUREQA by EUA (Empowering universities to fulfil their responsibility for Quality Assurance; 2012–2015) (with a focus on Albania, Bosnia and Herzegovina and Kosovo): <https://www.eua.eu/our-work/projects/eu-funded-projects/eureqa.html>).

A survey of the websites of the four organisations reveals around 20 of such projects, all funded by the EU Commission. Another project funded by the EU Commission which should be highlighted is the IMINQA (Implementation and Innovation in Quality Assurance) Project (Implementation and Innovation in Quality Assurance through peer learning; 2022-2024: <https://www.enqa.eu/projects/implementation-and-innovation-in-quality-assurance-through-peer-learning-iminqa/>) because it leads to another important supportive action by the BFUG through working groups. Since 2018, this activity has been complemented by a more proactive ‘structured peer support approach based on solidarity, cooperation and mutual learning’ (Paris Communiqué, 2018, p. 2) which provided countries with organised support by experts.

The IMINQA was the umbrella project that supported the work of the Bologna thematic peer group on quality assurance.



Although the direct impact of the projects on the implementation of the ESG cannot be measured without speculation, this summary demonstrates that governments, higher education institutions and EQAAs were not left alone to implement the ESG. It also demonstrates the relevance that was placed on the implementation of the ESG.

Impact

Measuring or even describing the impact of the ESG is challenging. There is surprisingly little published work on the overall impact of quality assurance (Williams & Harvey, 2015; Stensaker & Karakhanyan, 2020) The biggest challenge is to identify the impact that can be attributed to the implementation of the ESG directly as opposed to the impact of implementing quality assurance in general. Research literature normally focuses on quality assurance without addressing a potential specific contribution of the ESG. Grey literature published by actors of the Bologna Process, however, provides information which addresses directly the implementation and, to some extent, the specific impact of the ESG. It should be noted that on this basis no attempt will be made to analyse or measure impact of the ESG on the quality of teaching and learning which would have to be limited to speculation (also Beerkens, 2018).

It is worth noting that the analysis of the main literature used, the *Bologna Process Implementation Reports*, reports published by the E4 in preparation of the two revisions of the ESG, and material produced by stakeholders individually such as the *Trends Reports* by EUA, reveals highly convergent results that are largely confirmed by research literature. Impacts of the ESG will be presented under five headings.

One impact that stands out, which is frequently reported by the HEIs, is that the institutions in the EHEA named 'enhanced internal quality processes' as the most important institutional changes in the first decade of this century (Sursock & Smidt, 2010, p. 18). This was confirmed again five years later (Sursock, 2015, p. 54) which is remarkable if one considers the breadth and depth of reforms in European higher education in those years. In general, the higher education institutions attribute huge impact to quality assurance: 'Quality assurance (QA) has been central to the Bologna Process and the creation of the EHEA as shown by the 2015 Trends responses indicating that it has had high importance to 73% across the sample' (Sursock, 2015, p. 38).

i

The ESG boosted Quality Assurance

As presented in the previous section, formalised internal and external quality assurance activities were well established in only a few countries participating in the Bologna Process. A larger group was in an early stage of using such instruments, and another larger group did not have any formalised quality assurance activities at all.

The ESG boosted the development of quality assurance by giving guidance regarding

methodologies (Cirlan & Gover, 2024a, p. 20; Bologna Process Implementation Report 2012, p. 6; focus groups); furthermore, their adoption was a catalyst for developing quality assurance processes at institutional level (Sursock & Smidt, 2010; Sursock, 2015, p. 38; EUA & EURASHE, 2023, pp. 10 & 13) and in the national context (European Commission / EACEA / Eurydice, 2015, p. 93). It is worth noting that at national level this also included changes to the legal frameworks (European Commission / EACEA / Eurydice, 2018, p. 151; Szabo, 2023, p. 8; EUA & EURASHE, 2023, p. 10).

Those involved in the interviews made several comments that reinforce this point: the ESG was described as 'an anchor for' or the 'backbone of' quality assurance, its development and the relationship between internal quality assurance and external quality assurance. It should be noted that, for some participants, the two (ESG and quality assurance) are synonymous. For others, the ESG has been the inspiration that has opened up dialogue and debate nationally and internationally and provided a structure for ongoing discussion about quality assurance, thus facilitating understanding and acceptance of the principles they set out. There is impact nationally in terms of both accountability and enhancement. For one participant, the ESG, 'take us back to the fundamentals (of quality assurance) and remind us of what those are...'

ii**The ESG boosted stakeholder cooperation and student involvement**

'Today, cooperation in quality assurance within the EHEA has significantly increased, becoming one of the most successful outcomes of the Bologna Process, and the ESG are widely recognised as a valuable and indispensable common framework for developing shared criteria and methodologies' (EUA & EURASHE, 2023, p. 4).

The collaboration of the E4 in drafting and especially revising the ESG is the nucleus and the starting point for an unparalleled cooperation in all questions of quality in higher education such as the development of the European Approach for Quality Assurance of Joint Programmes and activities around the European Universities initiative. This cooperation even goes beyond quality assurance (Jungblut et al., 2023, p. 5). The value of this collaboration was frequently confirmed by stakeholders such as the higher education institutions that called it 'one of the most successful outcomes of the Bologna Process' (EUA & EURASHE, 2023, p. 4) and by the ministers (London Communiqué, 2008, p. 4).

In this context, one frequently referenced impact is the inclusion of students as equal partners (Onița et al., 2023, p. 29; Jungblut et al., 2023, p. 5). The role of students in quality assurance can be considered a unique European contribution to the development of quality assurance in addition to the external evaluation of EQAAs.



iii

The ESG created a common understanding

The impact of the ESG that has probably been highlighted most often in the past 20 years is that it laid the foundation of a common understanding of what quality assurance means among stakeholders and across borders (Szabo, 2023, p. 22) which was highlighted in all interviews. This is not to be underestimated because of great diversities that existed (Rozsnyai, 2003; Schwarz & Westerheijden, 2006). Nonetheless, as the interviews demonstrated, not everyone in higher education is aware of the ESG, nor do they need to have any detailed knowledge or understanding of them. At institutional level in particular, there is an overarching knowledge, acceptance and respect for the framework they provide with evidence of their implementation in institutional policies. But the majority of academic staff will understand the ESG from the perspective of their institutional IQA system rather than the Standards and Guidelines themselves.

Nonetheless, it was pointed out during the focus groups that the need for a certain level of interpretation of the ESG is one of its key strengths as it emphasises the diversity of context which is part of the European ideal. There is a need for willingness to work with this diversity and to work to interpret the ESG across 49 different national contexts. This work serves to reinforce transparency and trust across the EHEA and has particular significance in supporting cross-border quality assurance.

iv

The ESG create transparency and trust

Probably the most significant contribution of the ESG to the development of the EHEA is the creation of trust in the quality of provision and the quality of qualifications of higher education institutions that have implemented internal and external quality assurance in compliance with the ESG as highlighted in the European Commission / EACEA / Eurydice, 2020: 'One of the main benefits of quality assurance systems developing along the lines outlined by common standards and guidelines has been the strengthening of trust' (p. 6). Similar statements are to be found in all material and in research literature and were strongly corroborated by all participants in the interviews (e.g., London Communiqué, 2008, p. 2; Paris Communiqué, 2018, p. 1).

v

The ESG drives implementation of Bologna instruments and policies

The ESG contributed to the implementation of other Bologna commitments such as student-centred learning, student involvement, etc. Especially since its revision in 2015 and the more direct reference to other Bologna tools, this role of the ESG became

obvious, although it is appreciated differently by stakeholders (Gaebel & Zhang, 2018; Gaebel & Zhang, 2024, p. 19; Cirlan & Gover, 2024a, p. 23; Loukkola, 2012). Agencies saw a risk in this development: 'This evidence, together with many of the comments received, suggest that the criticisms about the ESG may relate in part to its use and application rather than to the actual content. This points to the need for further discussion around the purpose of the ESG, as any revision to the overall approach or inclusion of additional topics outside those directly related to quality assurance of learning and teaching would reflect a change in direction for the fundamentals of the ESG' (Cirlan & Gover, 2024a, p. 25).

One out of many good examples of the relevance of compliance of national Quality Assurance arrangements with the ESG is the agreement of the Bologna ministers, to 'make the necessary legislative changes to guarantee automatic recognition at system level of academic qualifications delivered in EHEA countries where quality assurance operates in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and where a fully operational national qualifications framework has been established' (Rome Ministerial Communiqué, 2020, p. 7). Indeed, participants in the interviews felt that there was a symbolic importance to the ESG – the fact that they exist and that 49 countries have signed up to them is important. Interviewees also pointed out that there is a benefit for Bologna ministers in making these changes since the ESG provides direction in terms of the development of policies and procedures without being prescriptive. They also allow authorities to set expectations for the national EQAAs and provide a threshold for the point of entry of a new higher education institution, thus protecting the whole of the EHEA against the approval of disreputable institutions.

4.3 The AQAF

In this section, the implementation of the AQAF is analysed, the drivers or lack of them are outlined and the impact of the development and implementation of the AQAF on the EQAAs and HEIs is identified.

Implementation

The establishment of AQAN in 2008 and the subsequent launch of AQAF in 2014 are important milestones in the overall goal of creating common reference points for higher education in ASEAN. Agency reviews initiatives under AQAF started in 2017. Two phases can be readily identified in the implementation of AQAF – Phase 1 was the pilot testing of the framework and Phase 2 represents the full agency review under AQAF.



The Pilot Test and Pre-implementation

The AQAF was established with the objective that EQAAs will undergo voluntary agency reviews to test their alignment with the regional framework QA principles. Chapter 3 of AQAF is dedicated to the mechanism, policies and processes of agency review. To prepare for full implementation of the agency reviews, AQAN, with the financial and technical support from the EU-Share Programme, identified four EQAAs, namely MQA, PAASCU, ONESQA and NAAHE, to pilot the agency review. In addition, 11 regional universities were also shortlisted to test the fit for purpose of Quadrant 3 of AQAF on institutional QA.

The European QA experts spearheaded by ENQA, in collaboration with ASEAN experts, developed the first agency review guidelines (Guidelines, 2017) and trained the agency staff on the self-evaluation report and the bi-regional assessors on AQAF standards and principles. The site visits were completed and final reports submitted by 2018. The post agency review studies and feedback obtained from the pilot exercise led to the revision of the Agency Review Guidelines (2021). These analyses not only offered suggestions on improving future agency and assessors training, but they also pointed to the potential need to review and refine the framework to improve clarity, reduce overlap and provide better explanation of principles. The 11 institutional reviews with site visits also provided additional observations and suggestions on improvements to Quadrant 3. The pilot testing of AQAF did not directly include the unique Quadrant 4 on NQFs as most EQAAs did not have direct responsibility for their NQFs.

Implementation of AQAF Agency Review

Benefiting from the experience and lessons from the pilot agency reviews, AQAN with the EU-Share support invited four EQAAs, namely Commission on Higher Education (CHED) - the Philippines, Lembaga Akreditasi Mandiri-Perguruan Tinggi Kesehatan (LAM-PTKes) - Indonesia, Division of External Quality Assurance (DEQA) - Lao PDR, and Accreditation Committee of Cambodia (ACC) to participate in the full agency review involving Quadrants 1 and 2. The training for the agencies and the nominated bi-regional teams of assessors were conducted followed by site visits in 2021. Two of the initial four EQAAs which volunteered were deemed through preliminary reviews of their self-evaluation reports as unprepared for agency review against AQAF and offered consultancies instead. Both CHED and LAM-PTKes were reviewed by a mixed panel of European and ASEAN experts, with an ASEAN chair, and reports with recommendations on the alignment with AQAF were submitted to AQAN in 2022. Based on the feedback from the two participating EQAAs – CHED and LAM-PTKes – a formal conclusion of the AQAF agency reviews by AQAN was still outstanding as of the time of the focus group discussion in January 2025.

Effectively, there is no formally concluded AQAF-based agency review by AQAN.



AQAF-based Consultancy

Since DEQA (Lao PDR) and ACC (Cambodia) could not prepare their SERs up to the expectations of the joint technical committee, the EU-Share programme and AQAN continued the agency review in the form of a consultancy with a visit. The bi-regional panel of experts visited both the agencies and interviewed and interacted with a variety of stakeholders representing the assessors, IQA, HEIs and ministries. These consultancies concluded with a report on the extent of the alignment of the agency practices to AQAF Quadrant 1 and 2. This report did not create any obligations on the part of the agencies to show follow-up actions based on the findings and recommendations. It is unclear if these reports were extended to and/or accessible to AQAN (AQAN Secretariat at MQA).

Impact

The following are the main five themes that emerged from the Focus Group Discussions⁵ held in two separate sessions. The first session included EQAAs and officials from ministries. The second session included IQA, Academic Affairs and one member of the taskforce that developed AQAF. Since there is practical very limited literature on the implementation of AQAF and especially the role of the broader set of stakeholders, the information culled from the stakeholders are new documented insights.

1 Limited knowledge of AQAF amongst HE Stakeholders

The lack of knowledge of AQAF was quite evident even before the focus group discussion started. Identified representatives of EQAAs, HEIs, student bodies and ministry officials declared their ignorance of the framework and their inability to contribute to the group discussion despite the assurance that they could benefit from the experiences and perspectives shared by others in the region. Many of the contacted representatives did not respond to the emails. Students and ministries declined the invitation to participate, citing lack of knowledge of the framework.

The EQAA representatives who attended the first session had some knowledge of AQAF. Some EQAA representatives had experience of preparing a self-evaluation report for agency reviews (e.g. CHED), had attended agency staff training (e.g. LAM-PTKes) and had participated in AQAN (e.g. CHED, BDNAC).

The IQA and HEI representatives had little knowledge of the AQAF. They could not see how knowledge of AQAF would support their efforts to improve the quality and global

5 See Annexe 1 for the interview guide used for the focus groups.



recognition of the institutions. Instead, some HEIs and EQAAs actually look to European (ESG) and American (AACSB, WFME) quality standards and frameworks to support the employability and mobility of their graduates.

Given the lack of consultation with the wider stakeholder group, it is not surprising that the knowledge of AQAF is largely limited to some EQAAs in the region, especially among agencies which participated in the agency review training and exercises organised between 2017 and 2022.

2

Acknowledgement of the need for a regional QA framework to help harmonise the diverse HE systems for better recognition of qualifications and mobility

Although the level of knowledge and awareness of AQAF was mixed, there was more agreement on the need for an ASEAN QA framework against which EQAAs can benchmark. This expression of the need for the regional framework resonates with the aim of AQAF to inspire the development of EQAAs and their QA practices so that they are comparable to global standards. The impression gained from the interviews is that the expression of need is a general desire for symbols of regional identity rather than one reflecting deep intentionality for organisation and action. The AQAF taskforce member and AQAN current chair were emphatic that the aim is to adopt a soft, bottom-up and voluntary process of aligning with good practices rather than one that is based on a strategy and plan with explicit milestones and targets. This approach is consistent with the general approach of ASEAN where there is a regional benchmark to make reference to (e.g. AQRF). This voluntary, organic and fluid approach is presumably in accord with the diversities in goals, systems, policies, laws, maturity and priorities experienced by the ASEAN Member States ranging from Singapore on the one hand and Myanmar on the other. This underpinning policy stands in the way of making AQAN membership or membership status (full or partial member) contingent upon successful alignment with the AQAF, thus depriving the framework of an important driver for success. APQN and APQR covering the broader Asia-Pacific region suffers from this same structural limitation, i.e., a requirement for agency review for membership. Hence, there is little incentive to undergo agency reviews.

3

EQAAs expect AQAN to play a more active role in raising awareness, stature and value of the AQAF in ASEAN

The lack of awareness of AQAF among some EQAAs and ministries of higher education was felt by some EQAAs to be the responsibility of AQAN leadership. Unlike the AQRF, the AQAF is yet to be endorsed by the ASEAN Ministers of Education. AQAN has yet to communicate with and convince the ministries of higher education of the importance

of benchmarking to and/or seeking formal alignment with the AQAF. Participants also admitted that the promotion of AQAF is complicated by the emerging intentions and initiatives to benchmark with frameworks outside the region. Some EQAAs are working to seek alignment with standards and guidelines by INQAAHE and CHEA because of the prestige factor, labour mobility and employability which their stakeholders value.

The EQAAs that bemoan the lack of leadership in AQAN to actively promote the value of AQAF in raising the quality of quality assurance are also members of the network and continue to look up to the traditional lead QA bodies in the region like BAN-PT, MQA and ONESQA. The leadership in these EQAAs has changed and perhaps also the commitment to a common space in SEA higher education. The passive and polite attitude of ASEAN EQAAs in AQAN has not driven the network to actively promote the AQAF in their contexts.

4 Acknowledgement of the limited success of promoting the AQAF through agency reviews

The study by Crozier (2020) of pilot agency reviews for the EU-Share programme showed that EQAAs are aware of the areas in which their practices fall short of international good practices. CHED representatives recounted how the private EQAAs in the Philippines have used the AQAF to harmonise their accreditation practices and IQA standards to ensure common standards and guidelines. Similarly, the emerging independent and private EQAAs are encouraged to benchmark themselves with regional or international frameworks to demonstrate readiness to shoulder their new responsibility to quality assure academic programmes in higher education.

Some of those interviewed believe that the success of the AQAF cannot be measured by traditional agency reviews. Since the framework is aspirational, development and voluntary, alignment should be through self-benchmarking by EQAAs. The appropriate measure is the use of the AQAF in the establishment, transformation and operation of the EQAAs. This view is not consistent with AQAF as the framework provides for formal agency reviews and describes the processes in brief. In relation to the unilateral and informal self-referencing process suggested, there have been no surveys or mechanisms to identify these impacts of AQAF except for some anecdotal reports from Indonesian and Philippine representatives.

At the institutional level, AUN-QA has recently developed its institutional assessment guidelines which are benchmarked to AQAF Quadrant 3. The growing interest in institutional assessments by AUN-QA in the region indirectly promotes the principles relating to institutional IQA embodied in AQAF. Although this is not widely acknowledged in any discussion on AQAF.



5

Review and revision are expected for the framework to be relevant, dynamic and comparable

All participants support the need for the framework to remain relevant. Alignment with other frameworks, especially ESG, is useful but not critical for continued recognition of qualifications from and within this region. There are also other mechanisms at work—mutual recognition agreements, foreign accreditation using ESG or ESG aligned standards and growing collaboration between ASEAN institutions as they seek international recognition. Institutions in Thailand, Indonesia, Cambodia, Lao PDR, Malaysia and Vietnam are showing growing interest in accreditation or assessment by EQAR-listed EQAAs based on ESG Part 1.

Some of the interviewees cautioned that alignment exercises with the ESG and other frameworks must seek to establish comparability rather than similarity. Some asserted that the region's unique values, history and education systems might not require the same expectations or principles.

4.4 Conclusion

The interviews strongly corroborated what the researchers learned from the literature review. The ESG has been more successfully embedded and implemented and the extent of impact across the EHEA is greater than could ever have been envisaged during the initial development of the 2005 version. The reasons for this are set out above, and the impact of the Bologna Process cannot be overestimated.

The AQAF, on the other hand, has no such visible support or political commitment and suffers from a lack of formal embedding in the region's overarching policies and processes and from a lack of leadership from those responsible for QA, i.e., the EQAAs/from AQAN. The fact that there is no incentive to align with the framework, coupled with limited knowledge of the framework across the main stakeholders, leads to a context in which it will not flourish. This is very evident in the fact that the only agency reviews that have taken place have done so under the SHARE project impetus and the two reviews and consultancies that took place subsequently have not been formally finalised. In addition, The AQAN Technical Advisory Committee has not yet been established. Perception of lack of completion will drive EQAAs to seek review and accreditation against other international/regional frameworks rather than against their own RQAF.

All this is in spite of the fact that, as this report shows, the AQAF is a strong and well-developed regional framework. ASEAN interviewees recognised that there is no real reason for the two frameworks to be similar—they just need to be comparable.

The AQAF and the ESG are more similar than different, especially at the level of the principle. The dissimilarities are most evident in terms of the support for and impetus to implement the framework.



5

Overall Conclusion



The study reveals a high level of alignment of the AQAF and the ESG regarding principles and content. At the same time, conditions in which the frameworks developed and the level of implementation and, consequently, their impact and relevance in general in the two regions differ substantially.

Alignment

Purpose:

In both the ASEAN and the EHEA regions, the frameworks were developed with a common aspiration for harmonisation of quality assurance, despite considerable differences in the higher education systems following economic, political, social and cultural diversity in the countries of the regions.

General approaches and concepts:

The two frameworks use the same general approaches and concepts, especially the non-prescriptive nature of the standards and principles.

Scope:

A substantial difference is the mention of research, services and management as subject matters of quality assurance in the AQAF. However, put into context of the entire framework, this does not seem to create a systematic expansion of the scope beyond teaching and learning.

Regarding the individual standards and principles, the level of alignment is very high. The only significant exceptions are:

- *Independence of quality assurance agencies and their legal nature:* This is a crucial standard in the ESG, whereas the AQAF opens the door for units of ministries being recognised as agencies with all the associated repercussions for organisational independence and independence of decision-making.



- *External evaluation of quality assurance agencies:* The ESG require independent evaluation of the agencies, whereas the AQAF, though not included in the four Quadrants, suggests self-referencing by the agencies which constitutes a significantly lower level of obligation.
- *Students in external quality assurance:* It is central for the ESG that students serve as panel members with the same rights as other members. This role is not required by AQAF.
- *Students in the learning process:* The concept of student-centred learning and thus the emphasis on the student's active involvement in IQA processes and student support developed as a core element since the revision of the ESG 2015. The AQAF does not provide an equivalence.
- *Publication of reports:* The publication of review reports is another central requirement of the ESG whereas this is not the case in the AQAF.
- *Internal review of internal quality assurance:* The AQAF sets out a specific Principle (3.9) in relation to the monitoring and review of the IQA system itself which does not have an equivalent in the ESG.

One purpose of this report is to make recommendations for further alignment of the ESG and the AQAF. The natural approach would be to translate these six substantial differences into recommendations to align. However, we emphasise that alignment should not be considered an end. What would be the aim of alignment? As explained in Chapter 3.1, RQAFs have proved that they play an important role in the development of quality assurance. They bear a huge potential for creating trust between higher education systems, HEIs and between other stakeholders, especially trust in qualifications. The question is, how far must alignment go to reach this aim? The focus group meetings revealed that similarity and equivalence are considered important and at the same time the message was clear that this does not mean identical. In this context, it is worth emphasising that the nature of AQAF as being aspirational was also highlighted during the focus group meetings. Any further revision or alignment needs to keep this feature in mind.

Furthermore, as highlighted frequently throughout the report, the legal and cultural context of higher education and thus quality assurance is of the utmost importance. Hence, if aligning standards leads to incorporation of culturally unfamiliar approaches, this would create the risk of disagreement and a lack of impetus or willingness to align.

The high level of alignment provides a very good basis for inter-regional trust in outcomes of quality assurance and in the qualifications and hence forms a good basis for cooperation between higher education institutions.

Based on this, the authors come to the conclusion that further alignment of the ESG and the AQAF is not of vital importance. The recommendations that follow are to be understood in this spirit.

Implementation

The report demonstrates that the implementation of the ESG and the AQAF cannot be understood without taking into consideration their specific backgrounds and the frameworks within which they were developed.

Initiative:

The fundamental difference regarding the initiative to develop such frameworks lay the ground for the substantially different implementation and impact of the ESG and the AQAF. The ESG are one out of three commitments of the Bologna Process, hence the initiative came from the key stakeholders and formally from the ministers of the participating countries of the Bologna Process. The initiative was based on the political will to have quality assurance systems that follow the same principles to facilitate transparency and mobility. Hence, the envisaged ESG was considered one, albeit important, pillar of a larger infrastructure. In the ASEAN region, although there are different initiatives to improve higher education outcomes (credit transfer systems, student mobility, mutual recognition agreements, referencing of NQFs to AQR, etc.), these are not coordinated and coherent, mutually supporting one another and with stable political support that would focus on the implementation of the AQAF. The lack of supportive political and policy frameworks is clearly a big challenge for the AQAF.

Authors and 'ownership':

A fundamental difference should be highlighted in this regard, which has a substantial impact on the implementation. The ESG were developed by the key stakeholders, namely the institutions, the students and the EQAAs, and were adopted by the ministers; the revision included also teachers, the labour-market and EQAR. The principle of stakeholder participation in the decision-making of the Bologna Process resulted in a strong ownership of the ESG by the stakeholders and thus by the key actors in quality assurance, namely the institutions implementing internal quality assurance, the quality assurance agencies implementing external quality assurance procedures, and the ministries setting the frameworks, not forgetting all those participating in quality assurance activities, namely teachers, students and labour-market experts. In particular, the ownership by the institutions is instrumental; from European experience we know that requirements or standards for internal quality assurance developed and imposed solely by EQAAs and/or ministries might create resistance. The AQAF, on the other side, was developed mainly by representatives from some well-established EQAAs with some involvement of stakeholders.

Hence, although both frameworks are examples of a global trend of developing regional approaches to quality assurance as one component of regional harmonisation of higher



education to support regional economic integration, the conditions of genesis of the frameworks are characterised by two fundamental differences with an impact on their implementation that cannot be overestimated.

The implementation of the AQAF has barely gone beyond a phase of piloting some reviews at institutional level and of EQAA. The fact that recently AUN-QA developed its institutional assessment guidelines which are benchmarked to AQAF Quadrant 3 constitutes a lighthouse activity.

Taking into consideration that the ESG has existed for 20 years and the AQAF only for 11, does not alter the conclusion: as Chapter 4 shows, the implementation of the ESG was highly dynamic especially in the first 10 to 13 years. The overall assessment of the impact and general relevance of the two frameworks also leads to different results. The ESG boosted internal and external quality assurance and is considered a cornerstone of the EHEA by creating trust in and transparency of qualifications. This trust and transparency apply to the relationship between institutions and countries/national higher education systems, and they apply also to the relationship between stakeholders; the latter being highlighted as an outstanding feature of the ESG, while trust among institutions and countries is an expected functional outcome. On the other hand, it is difficult to identify any substantial impact and relevance of the AQAF, despite statements during the interviews about its perceived relevance. The fact that the formal conclusions of two of the reviews of agencies have been pending for almost two and a half years gives an example of the lack of relevance.

The reasons for the different development of the two frameworks after their adoption are manifold. Following from the condition of genesis as mentioned above, these can be summarised as follows:

In the EHEA powerful actors supported or even required the implementation of the ESG which created incentives. And again, one cannot emphasise enough how important it has always been that these actors are not limited to EQAAs and ministries but include the institutions and the other stakeholders as well. It seems that in the ASEAN countries harmonisation of quality assurance has been dominated by some EQAAs. Not even AQAN which, in this specific case should be the prime actor, seems to place huge relevance on the implementation of the AQAF. The fact that AQAF assigns AQAN a crucial role in the implementation, which was never taken up by the association, marks the most important difference in the implementation of the two frameworks, i.e. strong ownership and important agents on the one side and lack of initiative on the other side. Incentives are obvious: Membership of ENQA and inclusion in EQAR on the side of the EQAAs, and, less tangible, eligibility of HEIs for partnerships through certified IQA.

Based on this, the authors conclude that the lack of implementation of the AQAF is the most important issue to be tackled and is substantially more relevant than further alignment to promote mutual recognition of qualifications and mobility with other regions. The suggestions for actions by SCOPE-HE that follow are to be understood in this spirit.



6

Recommendations and Suggestions



Considering the regional context of ASEAN and the aim of the AQAF, as an ‘inspirational document’ to take a ‘developmental approach’, the report recommends that SCOPE-HE, in partnership with all relevant stakeholders, including especially AQAN, uses the recommendations and specific suggestions to promote a more dynamic implementation of the AQAF. Although alignment of the two frameworks is strong, the ESG and the AQAF differ hugely in their implementation and impact.

The three recommendations offered in order of priority address key strategic gaps that limit AQAF’s potential as a powerful ‘inspirational and developmental’ quality assurance tool for the region. The suggestions are intentionally left more open and less prescriptive so that the specific actions can be formulated based on practicality.

Recommendation 1: AQAF should be formally recognised by competent authorities at the national and ASEAN level as the regional reference for their EQAAs, accreditation standards and processes, and institutional quality assurance to *encourage*, support and *inspire* Member States to *use it*, align *with it* and *harmonise* the national quality assurance systems against it (AQAF, 2016, p. 13).

Short-term Actions (within six months):

- a** Open communication with AQAN and the ASEAN Secretariat to explore how AQAN, through a formal role as an affiliated entity of the socio-cultural pillar of ASEAN, can best exploit the resource that is the AQAF to the benefit of HE across the ASEAN region.
- b** Open discussions with AQAN to explore how best to reignite that network, in partnership with other stakeholder bodies with a view to implementation of the AQAF (revisit the AQAN strategic plan and draft an action plan).
- c** Finalise the pending reviews of EQAAs.

Medium-term Actions (one to two years)

- a** Explore options for membership criteria for AQAN based on having undertaken a review, regardless of the outcome.
- b** Work towards the formal recognition of AQAF by the appropriate political forum/platform within ASEAN to signal its importance within the region.
- c** Work towards the formal recognition of AQAF by the competent national authorities in ASEAN Member States.



- d** Prepare an analysis of potential barriers for implementation of AQAF at national level, at agency level, and at institutional level in ASEAN Member States. Prepare a good practice guide on how to overcome the barriers.
- e** Explore together with ENQA strategies to maintain the aspirational character of AQAF and to avoid an overly compliance-oriented implementation of ESG, as mentioned in Chapter 5.

Recommendation 2: ASEAN entities should collaborate with EU partners to create supportive political and policy frameworks to strengthen the context within which the AQAF sits.

Recommendation 3: AQAF must reach out to and develop support of a broader set of stakeholders – all types of EQAAs, institutions, staff associations, student bodies, ministries of education and chambers of commerce, rather than just the national EQAAs – to ensure that the AQAF has broad ownership within the region.

Short-term Actions (within six months)

- a** Open discussion with AQAN on the need to cultivate broader stakeholder knowledge of and involvement in AQAF related matters.

Medium-term Actions (one to two years)

- a** Work to develop an appropriate mechanism or platform for all the stakeholders to participate and determine the future directions of AQAF.
- b** Develop support mechanisms to implement AQAF at institutional level through peer learning activities and promotion of good practice.

Recommendation 4: Key gaps in AQAF and the ESG identified in the study should be addressed to achieve even greater comparability with global good practices and within framework coherency. These gaps are:

AQAF:

- i** Greater **role of students** in quality assurance including their role in the assessment panel consistent with Principle 2.1 to serve ‘... the interests of students...’ (AQAF, Quadrant 2)



- ii Cyclical external review** of EQAAs to ensure these agencies are continually improving to meet principles stated in AQAF. This will support and drive agency reviews as a good practice.
 - iii** Carrying out **regular analysis** of quality assurance activities to explore opportunities for continuous improvement.
 - iv Publication of accreditation reports** in addition to the accreditation outcomes to provide full transparency.
-

ESG:

- v Monitoring of the IQA system** by internal quality assurance unit for continuous improvement.
-

Medium-term Actions (one to two years)

- a** After a decade of existence, it is time for a review of the AQAF to improve internal coherence, clarity and guidance; taking advantage of this and other studies (e.g., SHARE review reports) to enhance comparability with ESG and new trends and challenges in QA.
 - b** Use the opportunity of the review of the AQAF to open the review process to a broad range of stakeholders to consider how they, under the leadership of AQAN, can be part of the debate on how the gaps identified in this study may be addressed in AQAF more explicitly.
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Recommendation 5: It is in the mutual interest of both regions to organise joint seminars/workshops on issues of common interest to create better understanding of the external quality assurance environment and higher education in general.

Short-term Actions

- a** Joint seminars by ENQA and AQAN on their journey to date. These seminars can create better understanding of the challenges, changes and lessons that this holds for both regions. These joint seminars can also target topics of common interests, for example, micro-credentials, credit transfers and internationalisation.

Medium-term Actions

- a** ENQA and AQAN should consider a formal comparability study with the aim of mutual recognition of reviewed agencies. This can provide a pathway for ENQA members who are conducting EQA work in the ASEAN region to connect to AQAF.



7

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Annexes



Annexe 1: Stakeholder Interview Guide

Focus Group	Theme	Specific focus/topic	Questions
Development groups (AQAN/ENQA)	<ul style="list-style-type: none"> ■ Context ■ Development ■ Implementation ■ Impact including success indicators ■ Ongoing challenges 	<p>For these groups, we can go as far as possible with all of the themes above in terms of context, purpose, implementation, impact and next steps.</p> <p>Requirements for implementation (voluntary/required); ease of use of the standards/principles/reference to introductory parts of the documents or to other parts or quadrants to assist with implementation.</p> <p>The necessity to revise what was already in place or whether the framework provided a new impetus.</p> <p>The value of the implementation process.</p> <p>Any assistance offered or sought in relation to implementation.</p> <p>Success factors for implementation</p> <p>Discussion of change since implementation – internal and external perception</p> <p>Next steps – ongoing awareness-building; implementation or revisions to implementation following review – what do participants view as necessary next steps in this regard?</p>	<ol style="list-style-type: none"> 1. Perception of regional QAFs – isomorphism or unity in diversity? Standards vs Principles – semantics or substantive; IQA (AQAF) vs IQA system (ESG) 2. What has been the biggest impact? 3. What aspect of ‘the other Framework’ would be the most important so that it would facilitate international recognition, mobility, collaboration? 4. What aspects should be highly aligned so that international recognition, mobility, collaboration would be facilitated. 5. Which aspects wouldn’t need a high level of alignment? <ul style="list-style-type: none"> ■ In what ways has the development and implementation of the ESG surprised you? ■ Do you think it is possible for the three parts to be viewed differently by different stakeholders in relation to compliance/alignment? ■ Why do you think the ESG has been so successful in the EHEA? ■ If you could give one piece of advice to another region developing such a framework, what would it be?





Focus Group	Theme	Specific focus/topic	Questions
Ministries	<ul style="list-style-type: none"> ■ Awareness/context (of entire framework and its purpose) ■ Development ■ Implementation ■ Impact including success indicators ■ Ongoing challenges 	The focus will be on the themes above in relation to national and regional priorities.	<ol style="list-style-type: none"> 1. Perception of regional QAFs – isomorphism or unity in diversity? Standards vs Principles – semantics or substantive; IQA (AQAF) vs IQA system (ESG) 2. What has been the biggest impact (in your own context and if you have any views on the wider European/ASEAN context)? 3. What aspect of ‘the other Framework’ would be the most important so that it would facilitate international recognition, mobility, collaboration? 4. What aspects should be highly aligned so that international recognition, mobility, collaboration would be facilitated? 5. Which aspects wouldn’t need a high level of alignment? 6. Has the implementation of the ESG changed your relationship with the EQAA(s) and/or HEIs and their students?

Focus Group	Theme	Specific focus/topic	Questions
EQAAs	<ul style="list-style-type: none"> ■ Context ■ Development ■ Implementation ■ Impact including success indicators ■ Ongoing challenges 	<p>Our work with ACC, Cambodia (consultancy) and my work with Padraig in Lao PDR (consultancy) are for developmental purposes. I feel in both cases, EQAAs are not ready for a review but can still claim to have been evaluated for alignment. It is a less demanding and intrusive review of the agency using AQAF. Maybe this is another form of alignment short of a full agency review. Consultancies are less public and hence low risks to the EQAAs especially if their efficacy or legitimacy is questioned. I like to pursue this point in the interviews with EQAAs in ASEAN to see if my observation is a shared view.</p> <p>For the EQAAs, it will be interesting to discuss the themes above in terms of their internal perception of implementing all parts of the frameworks (we may get more information on Parts 2 and 3 and Qs 1 and 2) but their perception of the relevant sections on IQA will also be interesting.</p>	<ol style="list-style-type: none"> 1. Perception of regional QAFs – isomorphism or unity in diversity? Standards vs Principles - semantics or substantive; IQA (AQAF) vs IQA system (ESG) 2. What has been the biggest impact? - Benchmarking, effectiveness 3. What aspect of ‘the other Framework’ would be the most important so that it would facilitate international recognition, mobility, collaboration? 4. What aspects should be highly aligned so that international recognition, mobility, collaboration would be facilitated? 5. Which aspects wouldn’t need a high level of alignment? <ul style="list-style-type: none"> ■ You will all be aware of the aims and purposes of the ESG: do you think they achieve their stated goal? ■ Are you satisfied with the level of your involvement in the development and revision of the ESG to date? ■ What has been the biggest impact of the ESG on your work? ■ What are the biggest challenges for you a) in complying with the ESG as an EQAA, and b) in working with your HEIs to help them achieve alignment?

Focus Group	Theme	Specific focus/topic	Questions
			<ul style="list-style-type: none"> ■ Are you aware of the AQAF? If so, how far do you think that it aligns with the ESG? In what way is this helpful to you in your work? ■ If you could give one piece of advice to EQAAs developing such a framework in another region, what would it be?
<p>HEIs</p>	<ul style="list-style-type: none"> ■ Awareness/context (in particular P1/Q3) ■ Development ■ Implementation ■ Impact including success indicators ■ Ongoing challenges 	<p>In Europe, we should find a reasonable level of awareness and a diversity of reasons for implementing Part 1 of the ESG and the impact. This will make for an interesting correlation with responses from ministries and EQAAs.</p> <p>Specific aspect of impact: perception of relevance for HEIs in terms of international recognition, mobility, collaboration (an interesting topic for the question would be to what extent such regional frameworks have been aligned to support mobility, etc.)</p> <p>If there is a real lack of knowledge and understanding, then there needs to be a set of questions that guides the participants towards giving their views on such a framework and whether they think it would be beneficial/ provide impact.</p>	<ol style="list-style-type: none"> 1. What has been the biggest impact? 2. Awareness of 'the other Framework' (anecdotal evidence tells me that hardly anybody in Europe has heard of AQAF)? 3. What aspect of 'the other Framework' would be the most important so that it would facilitate international recognition, mobility, collaboration? 4. What aspects should be highly aligned so that international recognition, mobility, collaboration would be facilitated? 5. Which aspects wouldn't need a high level of alignment? <ul style="list-style-type: none"> ■ How would you describe your awareness of the ESG a) as a whole and b) Part 1 in particular? ■ Were you involved in the development of the ESG to date? ■ What are the biggest challenges for you in aligning with Part 1 of the ESG?

Focus Group	Theme	Specific focus/topic	Questions
			<ul style="list-style-type: none"> ■ What has been the biggest impact of the ESG on your institution? ■ Are you aware of the AQAF? If so, how far do you think that it aligns with the ESG? In what way is this helpful to you in your work? ■ Do you consider the ESG to be a compliance framework or a supportive one and why?
<p>Students</p>	<ul style="list-style-type: none"> ■ Awareness/context ■ Development ■ Implementation ■ Impact including success indicators ■ Ongoing challenges 	<p>Student involvement in QA in ASEAN is still passive – feedback on their experience. They are not involved in institutional QA. They are consulted by EQAAs as part of the assessment exercise. This is stage 1 of student engagement in QA.</p> <p>EHEA: focus on awareness and (especially if we are talking to ESU), whether there was involvement in implementation and whether there is any perceived impact.</p> <p>Specific aspects of impact: perception of relevance for students in terms of international recognition, mobility, collaboration (an interesting topic for the question would be to what extent such regional frameworks have been aligned to support mobility, etc.)</p>	<ol style="list-style-type: none"> 1. How much does their QA systems being in alignment with regional QA frameworks matter? 2. What has been the biggest impact? 3. Awareness of ‘the other Framework’ (anecdotal evidence tells me that hardly anybody in Europe has heard of AQAF)? 4. What aspect of ‘the other Framework’ would be the most important so that it would facilitate international recognition, mobility, collaboration? 5. What aspects should be highly aligned so that international recognition, mobility, collaboration would be facilitated? 6. Which aspects wouldn’t need a high level of alignment? <ul style="list-style-type: none"> ■ Did you have any involvement in the development or revision of the ESG? ■ In what way do you see the ESG having an impact on your institution?



Focus Group	Theme	Specific focus/topic	Questions
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- Do you think the ESG is important for students? If so, why?
 - What do you see as the biggest challenges for students in relation to non-implementation of the ESG?
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**Annexe 2: AQAF & ESG – ASEAN Stakeholders Interviewed**

Date	Group	Name	Organisation
January 15	Ministry	Prof. Dr. Morshidi Sirat	Special Advisor to Minister of Higher Education, Malaysia
		Mohamad Dzafir Mustafa	Senior Director Standards and Capability Development, MQA, Malaysia
	EQAAs	Ricardo Palo	Executive Director, PAASCU, Philippines
		Dr. Arum Atmawikarta	LAM-PTKes, Indonesia
		Ms. Jauyah Tuah	Brunei Darussalam National Accreditation Council (BDNAC)
	Ministry	Dr. Ethel Agnes P Valenzuela	Commissioner (Deputy Minister for Higher Education), CHED, the Philippines
		Assoc. Prof. Chayaporn Wattanasiri, Ph.D.	Committee Member of the Commission on Higher Education Standards, MHESI, Thailand
		Assoc. Prof. Nantana Gajasen, Ph.D.	Committee Member of the Commission on Higher Education Standards, MHESI, Thailand
		Ms. Noparat Prasartkhetkarn	QA Team, Quality Enhancement on Higher Education Management Division, MHESI, Thailand
		Nicole Asedillo	CHED, the Philippines
		John Paul Lesaca	CHED, the Philippines
		Elly Nurachmah	LAM-PTKes, Indonesia



Date	Group	Name	Organisation
January 16	Taskforce	Prof. Zita Fahmi	Vice Chancellor, Quest International University, Malaysia (Former Deputy CEO MQA)
	HEIs/IQA	Dr. Fairuzeta Bt Hj Mohd Jaafar	Academic Office, University Brunei Darussalam
		Prof. Alyssa M. Peleo-Alampay	Asst. Vice President (Academic Affairs), University of Philippines
<p>EHEA (NB: European participants were informed that they would not be named in the report)</p>			
January 17	4 x representatives from EQAAs		
	2 x representatives of HEIs and students		
January 20	7 x representatives from ministries, ENQA, EQAR, Business Europe		

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