**EUROCADRES COMMENTS
ON THE PROPOSAL FOR A RECOMMENDATION
ON COOPERATION IN ASSURANCE QUALITY
IN HIGHER EDUCATION**

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EUROCADRES considers it essential to achieve a high quality of education and training in Europe. Mutual recognition of qualification and diplomas is not only a key element of the right of free movement of people, but is also an important aspect of European citizenship.

EUROCADRES has been suggesting for several years that a European area of mutual recognition of qualifications and diplomas with efficient and coherent instruments (including accreditation processes) with the involvement of the concerned partners be set up.

For these reasons, EUROCADRES welcomes the proposal for a recommendation on quality assurance in higher education presented by the European commission. We share the objective to "give a strong impulse to the establishment of a coherent European system of quality assurance ... (which) would facilitate recognition of qualifications and promote mobility". We are convinced that the Commission's proposals must be implemented, but in order to achieve the announced objectives, they must be made more coherent and precise. That is why we present the following remarks and proposals.

1. GENERAL APPROACHES

Internal quality management:
Quality of higher education must meet internal objectives and use internal mechanisms as it is noted in the explanatory memorandum (2.A). However it would be an illusion to stay within the limit "to develop internal quality management" without taking into account the environment of higher education, its links with society as a whole. For

these reasons, it appears that any "peer review" evaluation process has to be open to other stakeholders.

Quality and accreditation:
In addition, we think that it is not enough to implement quality assurance processes with the only purpose of improving quality of education. Of course it is indispensable, but it is insufficient. These processes must be concluded by an accountable decision concerning their results, which is the role of accreditation processes. They must be established at both national and European levels. Quality assurance and accreditation may be performed by the same agencies. EUROCADRES thinks that accreditation is not a supplementary option to quality assurance processes, but that this instrument is necessary for real transparency and is indispensable for mutual recognition of qualifications.
We call for amending the recommendation and making it more precise on this point. If not it would fail to achieve the announced objective of transparency and mutual recognition of qualifications.

2. PRACTICAL PROVISIONS:

Set of standards, procedures and guidelines :
We share the proposal to develop "an agreed set of standards, procedures and guidelines on quality assurance" which has to cover accreditation equally. Experience shows that there is real progress and that it would be helpful to gather this set in a code of principles.

Quality assurance and accreditation agencies :
Quality assurance and accreditation agencies have an essential role to play. Among the proposed criteria we ask to clarify the following points:
- **Independent agency**: as a priority the agency has to be independent of the organisations that it evaluates.
- **Profit making or not for profit agency**: the agencies must have the necessary means for their work and must be able to cover their costs (including payment received for their activities). Various statutes may exist. However it appears that the "for profit" enterprise character would undermine their independence.

European register of quality assurance and accreditation agencies :
EUROCADRES supports the Commission's proposal to establish this kind of register. It will be an important contribution to the transparency and the credibility of the work performed by these agencies. However it must be organised with different kinds of registers in order to contribute to the mutual recognition of qualifications:

- **A register for fundamental accreditations[*], which contains** agencies/systems, which define the basic standards in the main areas and professions on the basis of national and local experiences, at the European level. It is important to make sure that such accreditation processes correspond to the academic and professional realities and involve the various stakeholders.
  Such fundamental accreditation processes contribute to the foundation of mutual recognition of qualifications and diplomas. In addition, they help avoid the use of non-European standards by establishing common European criteria.

- **A register for more specific quality/accreditation agencies:** which contains agencies/systems established at various levels, in specialised areas, with objectives which can focus on specific targets and can be diversified.
  Specific labels or certificates can be promoted. In that case the suggestion of freedom of institutions to choose an agency is justified.

The management of the registers system, must be flexible in all cases and must involve representatives of the agencies, of higher education, of the students, of the social partners and of European institutions.

EUROCADRES represents professionals and managers organised throughout Europe in all branches of industry, public and private services and administrative departments. A large number of them are university graduates and have responsibilities in the economic and social area and in society. This experience is the basis of our involvement as a European social partner. It can contribute to improve synergies between education and economic/social life.

EUROCADRES expects that progress in assurance quality and accreditation processes will guarantee the further development of the diversity in the European higher education area, will improve the quality of education and training and will facilitate mutual recognition of qualifications and diplomas.

Together with its member organisations, EUROCADRES is committed to develop its active involvement, at both national and European levels, for the progress of assurance quality and accreditation processes in Europe.

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[*] EUROCADRES is involved in the EUR-ACE project aimed to establish a European accreditation of engineering programmes and graduates. It is an example of this kind of "fundamental accreditation" for a profession.