

Bertelsmann Stiftung



Final Report

Implementing Framework Service Contract EAC 02/2010 (lot 3)
And Specific Contract EAC/2012/0152

“Delivering Education across Borders in the European Union”

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Publications Office of the European Union

2013 – 130pp. – 21 x 29.7 cm

2013.4457 - NC-31-13-949-EN-N

ISBN 978-92-79-29741-0

DOI: 10.2766/38072

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1. Executive Summary

1 Introduction

This report presents the findings of a study on the provision of franchising, validation and branch campuses in Higher Education across borders in the EU, referred to as cross-border higher education (CBHE). It was conducted on behalf of the European Commission by a consortium led by the Bertelsmann Stiftung, including Ecorys, ESMU and Horváth & Partners, in partnership with CHE Consult.

The study covered three areas:

- (1) A mapping of the intensity and spread of CBHE carried out in the 27 EU Member States, covering both EU and non-EU based institutions (see chapter 3);
- (2) A mapping, analysis and assessment of the relevant regulatory frameworks (see chapter 4); and
- (3) An analysis of the risks and benefits of CBHE provision as well as issues of quality as perceived by stakeholders (see chapter 5).

2 Methodology

The findings are based on extensive desk-research as well as information gathered through an Experts Delphi process, a survey and in-depth interviews:

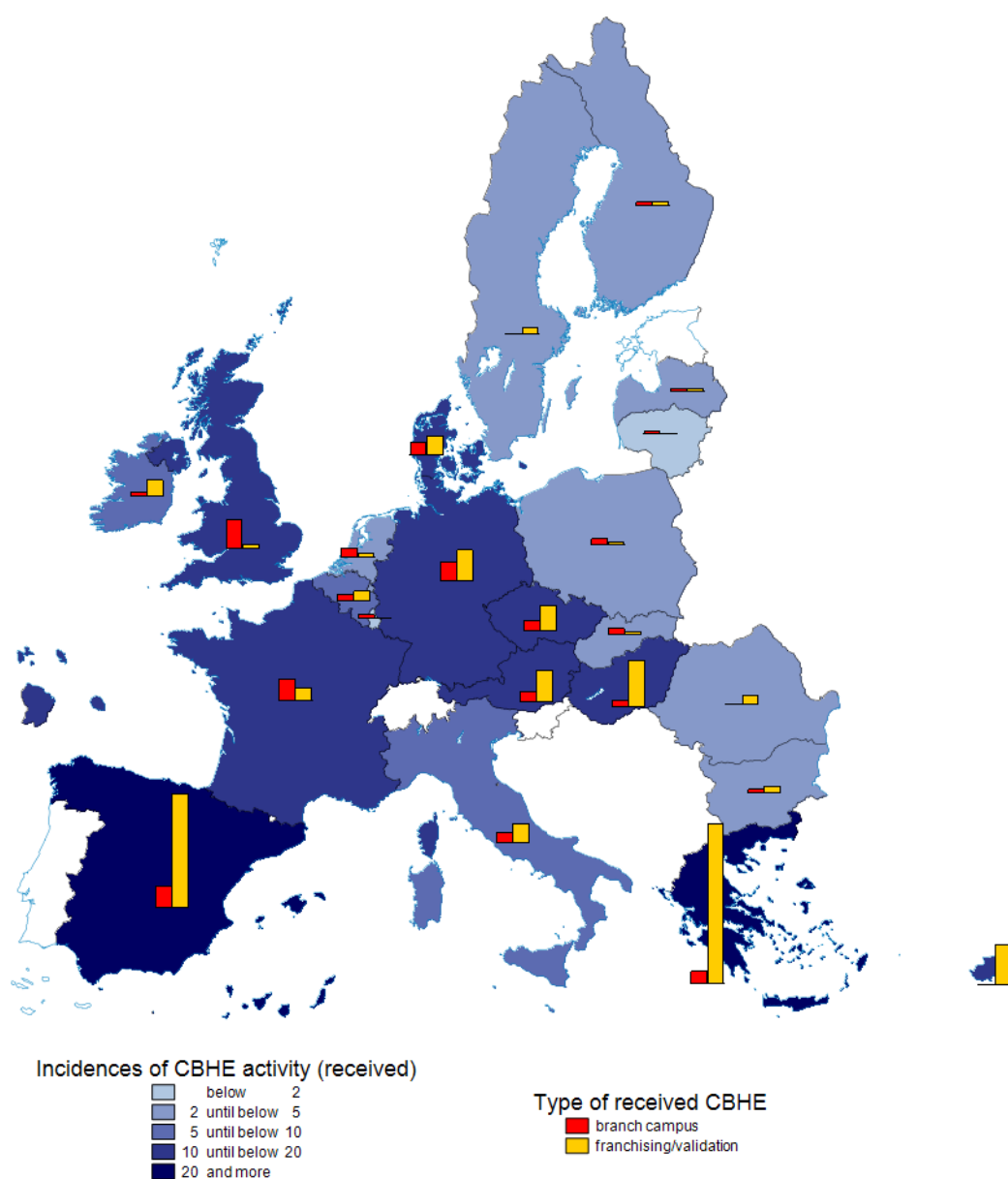
- The Experts Delphi process was used to get groups of stakeholders involved in improving the quality of the project as well as increasing its relevance. Two rounds were used to involve stakeholder organisations in 1) helping to scope the parameters of the issues being addressed and 2) validating the developed questionnaires for the stakeholder survey. Thirty-seven organisations took part in March and April 2012, mainly ministries and QA bodies.
- The survey used the Tailored Design Approach, involving multiple reminders. It was carried out in May/June 2012 and included 241 stakeholders (Ministries, Quality Assurance Agencies, Rectors' conferences, CBHE Providers and ENIC/NARIC bodies) in the 27 EU Member States.
- In-depth interviews were conducted in four countries (Austria, Cyprus, France, and the UK). The purpose was to enrich the data gathered through the survey by delving in greater detail into the key issues of: provider motivations and the impact of CBHE; perceptions of regulation and their effects; and the role of quality assurance. Fifteen interviews were conducted with ministries, QA bodies and providers across the four countries.

3 Intensity and spread of franchising, validation and branch campuses

Franchising, validation and branch campuses in Europe are in their infancy

It is clear from the evidence gathered that CBHE in Europe as a whole is in its infancy. The 253 identified CBHE activities present a scattered and fragmented picture. The patterns we can observe reflect many decisions and considerations by individual institutions or faculties/departments exporting higher education services abroad. CBHE affects only a tiny fraction of students within the EU. This is not to say that it is insignificant for those students or institutions involved. Moreover, the literature indicates that CBHE is on an upward curve.

Figure 1: Received CBHE activity by type of activity



High concentration of CBHE activities in Spain and Greece, in urban centres and industrialised areas

In total, 253 CHBE activities operating in 24 EU Member States have been identified. No providers have been found to be operating in Estonia, Portugal and Slovenia. Low levels of CBHE activity can be observed in Lithuania, Bulgaria and Poland. The Member States receiving the highest levels of CBHE activity within their borders are Spain and Greece.

When considered at the region level, CBHE activity is found to occur primarily – or in some countries even exclusively – in the capital cities, which indicates that the political, economic and cultural hubs are especially attractive locations for foreign providers, presumably because demand is higher due to higher population density and to the reputational bonus of being established in a metropolitan centre. This pattern matches the geographic distribution of domestic higher education institutions, which are more likely to be found in capital cities and other urban centres than in rural areas.

Franchising/Validation activities more frequent than Branch Campuses

In the list of providers aggregated for this study, the combined category of franchising and validation clearly outweighs branch campuses. While the research team has not been able to aggregate robust data on the motivations to engage in one type of CBHE activity rather than another, it can be assumed that the comparatively “light footprint” required for franchising/validation is one reason for the imbalance. A definition of the terms used can be found in chapter 2.3.

Anglophone, public universities are the major exporters of CBHE

The findings clearly reflect the trend found at global level that exporting CBHE activities is dominated by Anglophone countries. In general private institutions tend to account more frequently for exporting branch campuses whilst public institutions tend to dominate the export side of validation and franchising agreements. This division may have something to do with reputation, with public institutions carrying a more highly valued imprimatur, and also with private institutions taking a different view of investments in branch campuses.

Small, private business institutions are the typical receivers of CBHE

It is clear that receiving institutions tend to be mostly small and private. The programs that are run tend to be those with small “overheads” such as business courses which do not require investment in special physical facilities such as laboratories. They also tend to use English as the language of instruction, thereby appealing to the constituency of students who wish to equip themselves with the global lingua franca (of business). In terms of branch campuses, Europe does not have institutions on the scale found in the Middle East and Asia.

Quality and quantity of provision in receiving country seem to be key factors in receiving CBHE

In a global perspective, the major receiving countries tend to be those where demand in both qualitative and quantitative terms for programmes from institutions in the Western Hemisphere outstrips the domestic provision. To test this pattern for Europe, the relationship between CBHE levels being received and outgoing student degree mobility (as an indicator of relative preference for foreign higher education) was analysed. This showed that the biggest receivers of CBHE tend to

coincide with the biggest exporters of students percentagewise. Naturally there are exceptions to this, such as Spain, where other factors are at play such as the popularity of English. Students' perceptions of the quality and/or quantity of domestic higher education are therefore assumed to play a major role in the emerging patterns of CBHE provision.

At the same time, whilst in some countries CBHE is filling gaps during a process of modernization (e.g. in Greece and Cyprus), in others, it might be more a question of CBHE filling niche gaps in domestic provision or meeting excess demand in very specialised subjects (e.g. in Germany, Austria, Denmark and France). Each country has a specific pattern of incoming CBHE shaped by unique combinations of factors.

The need to charge fees may also influence CBHE patterns

In examining patterns of CBHE provision, the fact that CBHE is normally self-funding (owing to restrictions on the use of public funding) must be regarded as an important factor. Tuition fees are likely to be high and therefore in countries where students pay little or nothing for higher education the likelihood of CBHE being attractive would be expected to diminish. This factor may be the case in Sweden, for example, although evidently this factor is overridden by other factors in countries such as Austria, Denmark and Germany which have low or no tuition fees but show a relatively high incidence of received CBHE. The need to raise high tuition fees may also be one of the reasons why most received CBHE takes place at private institutions, and may also be part of the explanation as to why capital cities are key locations of CBHE since they are likely to have the best "markets" for students willing and able to pay tuition fees.

Motivations for engaging in CBHE are varied and receiving institutions are not simply passive recipients

It would be wrong to reduce the motivations underpinning CBHE to a simple commercial calculus. Whilst the profit motive is a driver for rogue providers and degree mills, there is evidently a number of educational reasons for taking part in CBHE on the part of long-established and reputable HEIs. Furthermore, CBHE involves importers as well as exporters and hence it is important to consider the motives of the former as well as the latter. Although importers and exporters may not always be equal partners, exporters in pursuit of high quality and lengthy relationships often view their relationships as partnerships.

General lack of information on quality assurance

In terms of quality assurance, it is notable that there is often very little publicly available information on issues such as quality and accreditation on receiving institutions' websites and almost none on the degree-granting exporting institutions' provisions for quality assurance.

4 The map of regulatory frameworks

Diverse approaches to regulation

Member States were found to cover a broad spectrum in terms of the controls they place on the ability of foreign providers to operate on their territory. The study found that countries fall across four categories of regulation from the least to most restrictive:

- Minimal or no restrictions on foreign providers' freedom to operate (BE, CZ, [DE], FI, IE, NL, SE,)
- Foreign providers required to register and/or have sending country accreditation (AT, CY, BG, DK, EE, FR, HU, SI)
- Registration and/or consent or authorization from competent home or receiving authorities (ES, IT, UK)
- Foreign providers required to obtain accreditation in the receiving countries (EL, LV, LT, LU, PL, RO)

Slightly under one third of Member States have in place quite strict requirements. Even the Member States with no regulation, which number around one quarter, in practice may deter CBHE to some degree either by not allowing the accreditation of foreign provision, or by having in place extensive procedures for accreditation.

The relationship between the level of regulation and the amount of CBHE activity in receiving countries appears to be weak. It has not been possible to test the counterfactual question as to whether levels of CBHE would be higher if strict regulation did not exist. Whilst it is evident that countries that have strict regulation do not have high levels of CBHE (with the exception of Greece), we do not know what the level of demand is from exporting institutions to operate in those countries and therefore whether restrictions are reducing incoming CBHE.

Of the four countries in which in-depth interviews were conducted, Austria is probably most representative of the majority of EU Member States insofar as it has no major HE exports, but does experience some incoming CBHE. There is awareness in this country that evidence is required about CBHE before appropriate mechanisms can be put in place. Such an approach may have lessons for other countries.

Heterogeneous knowledge of regulation among stakeholder organisations

A striking feature of the results of the survey is the lack of knowledge regarding the effects of regulation. This occurs alongside a tendency for many respondents to desire more regulation of CBHE, even in countries with already high levels of regulation. This raises questions regarding the extent to which regulatory frameworks are based on existing experience regarding CBHE such as poor quality provision or fraud or are, instead, a reaction to concerns which lead to what we might term "just in case" strategies.

Equal treatment for EU and non-EU providers

Another important aspect of the results, in particular with regard to the drive to build up the European Higher Education Area, is that most receiving Member States do not differentiate in their regulatory frameworks between EU-based and non-EU-based providers, with the exception of Bulgaria, Greece and Cyprus.

High level of reliance on exporting countries for QA, but scarce regulation of own exported CBHE

Whilst two thirds of Member States have some form of regulation in respect of receiving CBHE, most of them rely substantially upon the accreditation processes of exporting countries. This is a significant level of trust. However, the degree of regulation of exports is strikingly minimalist in comparison. The exception to this is the UK and its peer-review based approach led by the QAA which stems from UK universities' independent status.

Even where countries tightly regulate the receipt of CBHE, exports may not be regulated. This is notable in itself, but especially interesting in light of the case law of the European Court of Justice, which has ruled that the exporting Member States is responsible for the organisation and evaluation of the courses and degrees granted by their higher education institutions, including those delivered in another Member State. With current low levels of CBHE there is clearly an opportunity to take steps on the exporting as well as the receiving sides to deal with issues of quality etc. before levels of CBHE increase.

5 Perceptions of risks, benefits and quality

A lack of hard evidence

Perhaps the most striking single fact to emerge from the research is the lack of hard evidence available about the effects of CBHE to inform national and European debates. This might be explained in part at least by the low incidence of CBHE itself in many countries. The only example of data gathering of overseas provision collected in a systematic way was found to be the country reviews conducted by the UK's QAA, though the most recent examples cover provision by UK institutions in countries outside Europe, and other examples may exist. In the absence of evidence, perceptions (and sometimes mis-perceptions) dominate. CBHE is a tiny fraction of most countries' HE at the moment but where it does reach high levels, the topic can become highly charged, and points of view can become polarised.

Regulation as insurance against future risk

In light of the findings on risks, benefits and quality one might ask about the reasons for the amount of regulation in many parts of Europe. In light of the apparent lack of hard evidence regarding quality, we might interpret the existence of regulatory frameworks as insurance against potential poor quality provision.

Scope to develop relationships across borders on quality

At the same time, it is evident there is scope to develop relationships between quality assurance agencies in Europe and the role of the EQAR. These may well be fruitful avenues to explore as complementary or perhaps alternative mechanisms to the current approaches to regulation.

6 Conclusions

Pattern of CBHE provision in EU Member States

The pattern of current CBHE activity is quite scattered and fragmented and private institutions play an important role especially in receiving CBHE. In relation to the export of CBHE, the domination of institutions from Anglophone countries reported widely in the literature is reinforced. UK institutions play a particularly important role in CBHE exports to Southern Europe.

Opportunities for CBHE are created where the kind or quantity of supply of higher education domestically does not meet demand. A strong statistical relationship was found between CBHE levels being received and outgoing student mobility which gives some support to this relationship existing in Europe. In some countries it may be a general lack of modernization within whole systems which provides an overall context for high levels of CBHE. In others, it might be more a question of insufficient quantity or quality of provision relative to demand in specific areas (or niches). Whether such opportunities are taken by exporting higher education institutions will depend on their own assessment of the risks and benefits, along with the obstacles which might stand in their way in relation to regulatory frameworks.

At the same time, the findings in relation to motivations highlight the need to take into account both sides of the partnerships involved in CBHE: it is not simply a question of passive recipients and active exporters. This is important since it reminds us that quality assurance should involve supporting both sides to develop and maintain high quality.

There is a general paucity of good quality, reliable data held centrally in Member States. This partly reflects the current low incidence of validation, franchising and branch campuses. Nonetheless, there is evidently a need for a much stronger understanding of patterns of CBHE at the level of individual countries. Such data would be a prerequisite for improving the information made available to students.

Regulation of CBHE in EU Member States

Although there are variations across Europe in the strength of regulation, the relationship between regulation and the incidence of CBHE is weak. There is little to suggest that current regulatory frameworks are founded on evidence-based policy-making. In this respect, the example from Austria of a step-by-step approach will merit attention going forwards, not least because their current pattern of importing and exporting CBHE is probably similar to a large number of countries.

There is a striking contrast between regulation of incoming CBHE and exported CBHE, with, on the whole, very little regulation by Member States of their higher education institutions' activities beyond their own borders. At the same time, most countries with some form of regulation rely substantially upon the accreditation processes of other countries as a means of trying to safeguard the quality of CBHE which they receive. In this regard, the UK's QAA approach to auditing the exports of UK providers is a good practice.

There is widespread limited knowledge amongst respondents about CBHE in terms of both perceived risks and benefits and effects. At the same time, it was notable that many respondents expressed a desire for more regulation, even in countries with levels of regulation which this study has shown to be high. Hard evidence in this field seems to be lacking, even taking into account the low incidence of CBHE in many countries. Respondents with a role in policy-making appear to be neutral in relation to both risks and benefits, and yet in many countries it has been made very difficult for foreign providers to operate either at all or effectively and efficiently.

An important issue is how best to assure CBHE quality – at the institutional or programme level. Institutional level accreditation has merits in terms of its lightness of touch and cost-effectiveness. At the same time, it is programmes that are exported, not institutions. How to balance out these forces can be an important issue for the future.

Scope for cooperation in the EU

On the face of it, much regulation appears to be a reaction to concerns, the putting in place of measures “just in case”. Member States appear to have relied upon their own resources to ensure protection for students and their own institutions, and there appears to be scope to develop cooperative arrangements. Indeed, the findings in relation to the current state of development of relationships between quality assurance agencies and the role of the EQAR indicate that there is scope to develop alternative measures based on driving up quality rather than restricting the ability to operate. Although most countries already rely upon the accreditation procedures of others, it is a moot point to what extent this is an act of faith as much as a convenience. It is clear that quality procedures vary substantially between countries and providers. Without transparency tools for registration or accreditation major variations in quality – and loopholes for rogue providers to exploit – are likely to exist. There is also scope for individual countries to pay more regard to the quality of their own institutions' exports for the mutual benefit of Europe.

Abbreviations

CBHE	Cross-border Higher Education
EHEA	European Higher Education Area
ENIC	European National Information Centre
EQAR	European Quality Assurance Register
EU	European Union
GATS	General Agreement on Trade in Services
HEIs	Higher Education Institutions
NARIC	National Academic Recognition Information Centre

2. Introduction

The European Higher Education Area (EHEA) aims at ensuring more comparable, compatible and coherent systems of higher education in Europe. The attempts within the Bologna Process to facilitate the comparability of educational programmes and degrees are testament that mobility in the area of higher education is not only desirable, but also needed in order to make European higher education attractive within a global context. It is, however, not only students, staff and research projects that cross borders. In recent years, provider mobility – i.e. franchising or validation of higher education programmes and the opening of branch campuses in other countries – has been proliferating at a quick pace, further facilitated by the Single Market within the European Union (EU). Yet, this particular element of the EHEA and of globalisation of higher education in general has remained under-researched especially regarding the quality assurance requirements.

The status quo in the 27 Member States of the EU at the beginning of our research was that:

- Overall, in the framework of the Higher Education Modernisation Agenda, the 27 EU Member States have committed to expanding access to, and improving the quality of, higher education with the aim of strengthening Europe's competitiveness in education, research and innovation, which is crucial to the success of the goals of the Europe 2020 Strategy.
- As of now there is an acute lack of accessible empirical data on the scope and quality of the cross-border provision of higher education services. Understanding of the risks and benefits of CBHE tends to be abstract or anecdotal, and national authorities are seldom aware of the extent of cross-border provision of higher education taking place in their country.
- The data that does exist is incomplete and scattered across various stakeholder organisations such as national ministries, quality assurance agencies and other umbrella organisations, as well as among various individuals within these institutions.
- Awareness of the phenomenon of cross-border higher education services in the EU varies considerably, both geographically and between different stakeholders.
- There are some supranational treaties and legislation (certain provisions in the Treaty on the Functioning of the EU, the Services Directive) that apply to the establishment of cross-border provision of higher education services, i.e. to franchising and validation agreements and the opening of branch campuses, in the EU.
- It is not clear, however, which types of national legislation are in place in the EU Member States to regulate the provision and quality of higher education through franchising and validation agreements or at branch campuses.

- It is not clear how these national regulations are de facto implemented and/or what impacts these regulations have in the applied practice of the various Member States and their authorities at the national and sub-national level in charge of higher education.
- Although particular challenges are posed by cross-border higher education services, for example with regard to quality concerns, there is no systematic mapping of the concrete kinds of disputes that arise in practice in the Member States of the EU, and how these are addressed.
- Several stakeholders – cross-border providers of higher education, Ministries of Education or similar government institutions, quality assurance and accreditation agencies – can help us arrive at a better understanding of these issues and may have specific recommendations for future action at EU and Member State level.

Despite the considerable amount of uncertainty surrounding the delivery of cross-border higher education services, the issue of regulation and quality assurance has not been left entirely unaddressed. Different guidelines and recommendations have been advanced at the European and global level, and the Center for Higher Education Policy Studies recently published a qualitative study on the impact of quality assurance on cross-border higher education services.¹

By expanding on what is already known, this study generates a more comprehensive and complete picture of the provision of cross-border higher education services in the 27 Member States of the European Union, its regulation and any quality concerns that have arisen. A large number of stakeholders have been involved in the development of our survey methodology and have contributed data, information and personal or institutional assessments.

This report presents the preliminary findings of the study on the provision of cross-border higher education services in the EU. It is being conducted on behalf of the European Commission by a consortium led by the Bertelsmann Stiftung and including Ecorys, ESMU and Horváth & Partners, in partnership with CHE Consult.

2.1. Purpose and Objectives of the Study

The general objectives of the study are threefold, focusing on the quantitative and the qualitative aspects of these educational arrangements:

- I. Provide a mapping of the cross-border delivery of higher education services within the 27 EU Member States (carried out by both EU and non-EU based institutions)
- II. Provide a mapping, an analysis as well as an assessment of the regulatory frameworks regarding cross-border higher education activities in place at the Member state level

¹ (Cremonini/Epping/Westerheijden/Vogelsang: Impact of Quality Assurance on Cross-Border Higher Education, 2012, studie voor INQAAHE, CHEPS, Enschede).

- III. Discuss and analyze the perceived risks and benefits of cross-border higher education provision as well as issues of quality

2.2. Scope of the Study

In consultation with the European Commission, the focus and scope of the study have been determined as follows:

- **Level of education:** Our study addresses cross-border delivery of higher education. This includes those institutions that are recognised as higher education institutions in the Member State where they are based, even though they might deliver programmes that would normally be classified as technical or vocational training in the Member State where they operate.
- **Geographical coverage:** In the mapping part of the study, our study covers the 27 EU Member States as regards the receiving countries. Institutions from non-EU exporting countries are included insofar as they offer their degrees within EU Member States.
- **Types of programmes:** In the mapping part of the study, we are looking at the opening of branches as well as the provision of education through educational franchising or validation agreements with institutions in the receiving countries. This might include cross-border programmes that are partly delivered online, as long as the hosting institution has a physical presence (building, administrative and/or teaching staff). The study does not cover programmes that are delivered entirely online without such a physical presence in the receiving country. Neither are joint/double degree programmes investigated.

2.3. Definitions

Cross-border higher education (CBHE)

As per the definition employed in this study, cross-border higher education (CBHE) encompasses the provision of higher education services abroad through branch campuses or in the framework of franchising or validation agreements entered into between an exporting and a receiving institution.

Franchising and validation

The definition of franchising and validation agreements used was that franchising and validation agreements are concluded between universities or other institutions of higher education which award diplomas, certificates or degrees and educational institutions (or other entities) responsible for running study programmes that lead to the award of these diplomas. In the case of both franchising and validation, the characteristic element is that one educational institution is responsible for the day-to-day running of a study programme and the other awards a diploma at its completion and therefore guarantees the quality of the programme. In case of cross-border educational franchising/validation schemes, the institution issuing the diploma is located in one Member State and the institution running the programme in another.

Exporting-receiving

In the literature and discourse, a number of dichotomies are used to describe the institutions carrying out the CBHE activity and awarding the degree and the institutions implementing the degree program in the destination country: sending-receiving, home-host, importing-exporting, providing-hosting. In this study, we have chosen to use the terms exporting and receiving because we find these to be sufficiently intuitive, while at the same time they reflect the notion of an active act of exporting higher education services, whereas the receiving country may be oblivious to, opposed to or completely neutral to the provision of these services within its borders. Despite the caveat that the receiving institution actively engages in an act of importing higher education, we consider the terms exporting and receiving most appropriate as much of our analysis is conducted at the country and region level.

The active nature inferred by the word exporting also reflects the rulings of the Court of Justice of the European Union concerning freedom of establishment and the recognition of diplomas² in which the Court has consistently taken the view that education and training provided within the framework of homologation agreements and diplomas conferred on completion of such education and training fall within the education system in which the establishment awarding the diploma is established, irrespective of the Member State where the course took place. It is therefore for the Member State in which the establishment awarding the diploma is established to determine the content and organisation of the education and training and evaluate the level of the courses provided.

Public and private

For the scope of this study public HEIs are those mainly funded by public funds whereas private HEIs are mainly funded through private funds, usually tuition fees.

2.4. Structure of the Report

The report is structured into three parts: Chapter 3 introduces the research approach and methodology. Chapter 4 presents, in the context of the existing literature and data, the results of the mapping of CBHE provision in the 27 EU Member States. Chapter 5 contains the mapping of regulatory frameworks in place in the 27 EU Member states, while chapter 6 covers a discussion of risks and benefits as well as quality issues as perceived by the stakeholders surveyed. The last part comprises the annex, which includes additional lists, maps, charts and tables as well as detailed country profiles describing the regulatory frameworks and CBHE characteristics of all 27 EU Member States.

² in particular in the Neri (13 November 2003, C-153/02), Commission vs Greece 24 October 2008, C-274/05) and (Khatzithanasis (4 December 2008, C-151/07) rulings.

3. Research Approach, Methodology and Yield

3.1. Project Stages and Progress

Along the lines of the tasks defined in the European Commission's Terms of Reference, the research plan consisted of the following four project stages:

- 1) Project Kick-off, activation of stakeholder organisations and development of questionnaire
- 2) Mapping of cross-border provision and regulatory measures
- 3) Qualitative analysis of key issues through case studies
- 4) Finalisation

3.2. Desk Research for mapping of cross-border provision in the EU

Prior to involving stakeholders a web-based desk research was conducted in which all available sources on CBHE in the EU were gathered and analysed. A number of experts from the consortium's network were subsequently asked to supplement this initial list.

3.3. Involving Stakeholders

At the heart of the study is a **web-based survey of stakeholder organisations** in CBHE in Europe, which enquires on the following issues:

- Familiarity with any providers of CBHE operating within the 27 EU Member States
- Regulatory and quality assurance mechanisms in place in the 27 EU Member States
- Assessment of the quality of cross-border programmes and any conflicts that have arisen over quality issues
- Stakeholder perceptions on the advantages and disadvantages of regulation and external quality assurance requirements
- Perceptions of risks and benefits associated with CBHE

In order to ensure high return rates and maximum value of responses in the main survey, the major stakeholders in the EU and beyond (ministries of higher education, umbrella organisations such as rectors' conferences, quality assurance agencies, ENIC/NARIC bodies, providers of CBHE, and other pertinent organisations) were approached for this study.

3.4. The CHE Experts Delphi

The CHE Experts Delphi methodology is based on the approach of the RAND cooperation, developed by Olaf Helmer, Norman Dalkey, and Nicholas Rescher during the 1950s and 1960s, who translated the idea of the Oracle of Delphi into a method for social research. Since then, Delphi surveys have been a tried and proven approach to bring a large number of geographically dispersed experts in on

the resolution of a common problem, and have also been applied to higher education (see “Hochschuldelphi” of the Heinrich-Böll-Stiftung).³ The CHE Experts Delphi differs from the original Delphi method in that it is not used for forecasts or decisions on an issue, but rather to get groups of stakeholders involved in improving the quality of a project as well as increasing its particular (local) relevance. In this it is comparable to the E3M project method.⁴ Especially in fields in which expertise is distributed across a large number of individuals, it has proven highly beneficial to turn stakeholders into actors and active participants in a study.

In the present study two rounds of an Experts Delphi were used to involve stakeholder organisations to 1) give feedback on the assessment of the situation, the completeness of description and their particular areas of interest in this study and, in the second round of the Delphi, to 2) validate the developed questionnaires for the stakeholder survey. An implicit goal in using this methodology was to involve stakeholders from the start, raise interest in the contents and create ownership through participation in order to maximise return rates.

CHE Experts Delphi round 1: Participation Statistics

In total, 188 individuals and organizations were approached between 23 March 2012 and 2 April 2012:

- 56 Members of the Thematic Working Group on Higher Education, including directors-General for Higher Education in Ministries of Education and higher education associations;
- 28 further Directors-General for Higher Education who were not already included in the thematic working group;
- 24 Umbrella Organisations of higher Education Institutions (e.g. rectors conferences);
- 48 European Quality Assurance Agencies;
- 2 further organisations working on the issue of CBHE; and
- 26 providers of cross-border higher education who are active within the EU.

Of these, 61 (32.45%) opened the first page. In total, 37 organisations (19% of the total sample) indicated their interest in becoming part of the Delphi experts group and participating in the development and refinement of the main questionnaire by finishing the survey. As this concerns involvement in the survey design this is considered to be a very satisfactory response rate. These are comprised of the following types of institutions (for a complete list, see annex 7):

³ (<http://www.institutfutur.de/projektseite/1536/0>).

⁴ (<http://e3mproject.eu/final-conference.html>).

Table 1: Types of institutions participating in the first Experts Delphi

Type of institution	Number of Delphi participants
Ministry	14
HEI Umbrella Organisations	8
Quality Assurance Body	13
Provider	1
Other	1

Of these participating stakeholders, 25 (71%) have previously dealt with issues of degrees offered through branch campuses, franchising or validation agreements.

Motivation to participate in the Experts Delphi

The respondents' motivation to participate in the Experts Delphi was guided primarily by an interest in quality issues and quality assurance procedures applying to CBHE. Specifically, the participants' interests were (in descending order of importance):

"Please rate the following areas of the study according to their importance / relevance to you and your organisation"	Rating⁵	
<i>Contributing to the debate about the extent to which cross-border programmes meet the quality standards of their host countries</i>	4,6	highly relevant
<i>Understanding the effects of cross-border higher education on the comparability of degrees.</i>	4,3	very relevant
<i>Understanding the effects of national regulations on cross-border provision, the disputes that arise, and the solutions found.</i>	4,2	very relevant
<i>Helping to shape future European Union action regarding cross-border services.</i>	4,1	very relevant
<i>Understanding the extent to which students are provided with the information they need to make the best decisions for their education.</i>	4,0	very relevant
<i>Learning more about branch campuses, franchising or validation agreements as a business model for Higher Education Institutions</i>	3,5	somewhat relevant
<i>Gaining an estimate of the number of study programmes being offered through branch campuses, franchising or validation agreements in your own country</i>	3,5	somewhat relevant

Further motivations to participate in the Experts Delphi were: the wish to develop mutually recognised quality assurance procedures for franchised programmes; the wish to obtain a perspective on quality assurance; a more academic interest in the different regulations; and the desire to gain a better understanding of the value of CBHE activities to the exporting and receiving country. The individual motivations of the participating organisations were relatively diverse, reflecting a high heterogeneity of positions and policies within the EU.

⁵ Scales range from 1 (not at all relevant) to 5 (highly relevant).

Yield in additional stakeholder organisations

The respondents of the first round of the Experts Delphi suggested an additional 48 organisations to be included in the main survey, raising the number of total organisations to be approached to 241 individual contacts in Ministries of Education, Quality Assurance Agencies, Rectors' conferences, Associations of Higher Education and Providers of cross-border higher education services (see expanded list in annex 8).

CHE Experts Delphi round 2: Participation and Yield

Based on theoretical considerations as well as the input from the first round of the Experts Delphi, a first draft of the main questionnaire was developed and submitted to all 37 participants in the first round of the Experts Delphi for comments and feedback. 15 participants sent detailed feedback about the questionnaire, which was used to further refine the wording and eliminate redundancies.

3.5. Involvement of Expert Advisory Board

The final draft of the main survey was developed based on the results of the two rounds of the Experts Delphi as well as the feedback provided by the project expert advisory board composed of leading scholars in the area (Peter Scott, Stamenka Uvalić-Trumbić, Hans de Wit). In a final step the questionnaire was coordinated with the European Commission. The complete main survey can be found in annex 9.

3.6. Main Survey and Tailored Design Method in Surveying

The methodology employed in the main stakeholder survey was the tried and tested Tailored Design Approach (TDM) as outlined in Dilmann et al. (2008), with which the consortium partners have produced very successful results on numerous occasions. The TDM is a compilation of design elements for surveying based on social exchange theory and 30 years of experience in the field. It introduces an approach of multiple mail contacts with participants in order to maximise return rates and voluntary participation.

Apart from the multi-contact approach (as outlined below), the general philosophy of Tailored Design is to show appreciation to participants, to ask participants for advice in their capacity as experts in their fields, to appeal to group values and to make participation an overall rewarding experience to respondents.

In this study, stakeholder organisations were contacted as follows:

Table 2: Application of TDA in this study

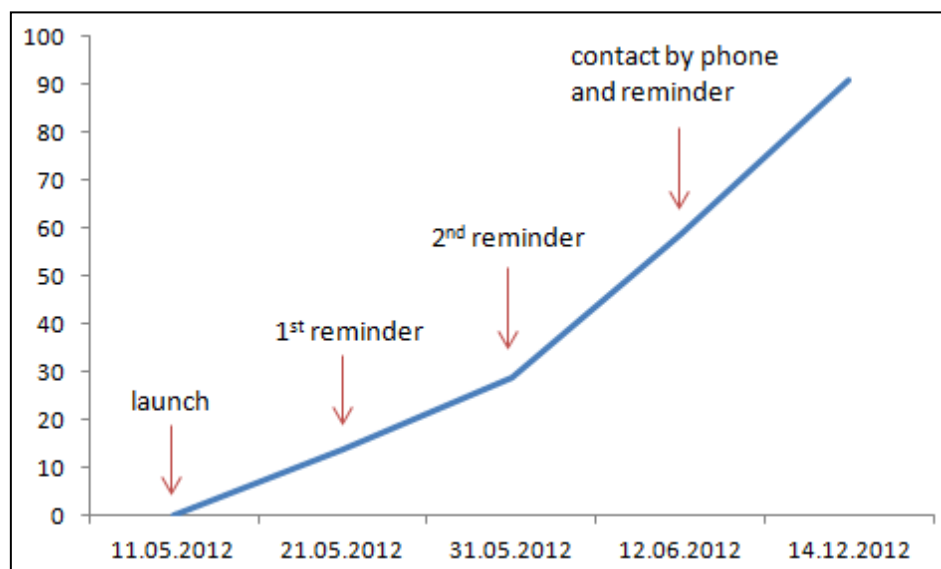
#	Type of contact	Schedule	Yield (cumulative)
1	Stakeholders were invited to participate in the Experts Delphi; the project and the upcoming main survey were announced	March and April 2012	37 participants in 1 st round of Delphi 17 participants in 2 nd round of Delphi
2	Stakeholders were invited to the main survey; letter of endorsement signed by Mr. Denis Crowley, Head of Unit at the Directorate General Education and Culture was attached to communicate the significance of the study	May 11, 2012	14 respondents ⁶ by May 20, 2012
3	Thanked respondents for participating; renewed invitation to all who had not yet participated	May 21, 2012	29 respondents by May 30, 2012
4*	Reminder: renewed invitation to participate, emphasizing importance of study	May 31, 2012	59 respondents by June 11, 2012
5*	Contacted non-responsive institutions by phone and followed up with reminder by email (Special contact according to Dillman et al., 1974)	June 12-14, 2012	91 respondents by end of project

**Only non-responsive institutions were contacted*

The Tailored Design Approach produced positive results, increasing the return rate considerably with each additional contact.

⁶ By date of last access

Figure 2: Development of participation numbers



Contacting individuals and institutions by telephone meant that concerns about the nature of the questions posed and limitations of expertise that had not been voiced by email could be handled. Nonetheless, in a few instances, individuals or organisations indicated that they did not have the relevant expertise to participate in the survey.

Main Survey: Participation Statistics

The main stakeholder survey opened on May 11, 2012 and officially closed on June 15, 2012, although additional responses were accepted over the following weeks in order to increase return rates and ensure as comprehensive a participation of national ministries as possible.

In total, 241 unique organisations were invited to participate in the main stakeholder survey. Of these, 91 respondents from 88 unique organisations participated in the survey⁷, which constitutes an institutional return rate of 37%. This section presents the participation statistics by country and type of organization.

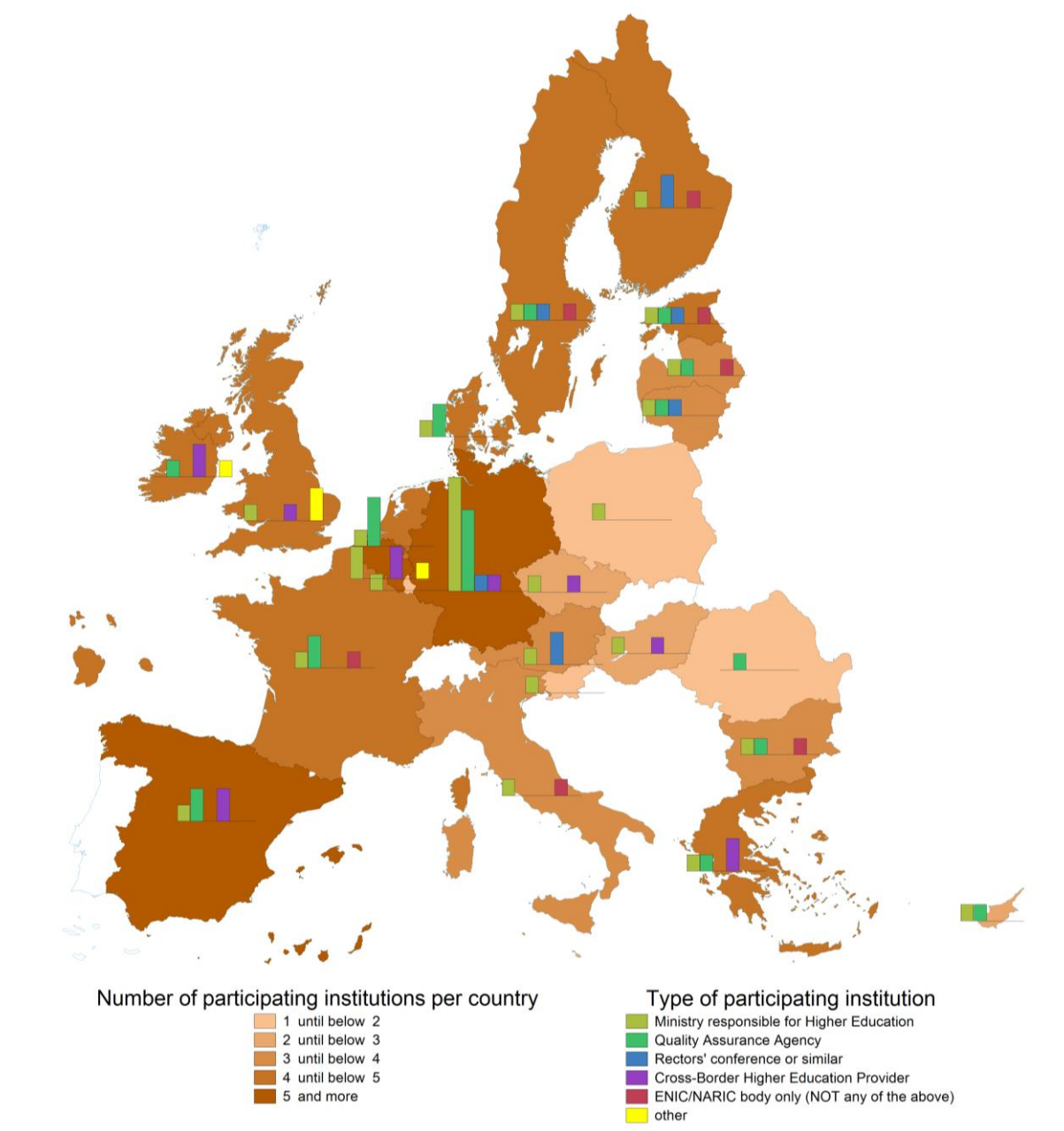
⁷ The following statistics include all respondents who completed the questionnaire at least up until question D1/D1a on the national regulation of CBHE activity (cf. the full questionnaire in annex 9)

Table 3: Participation by institution type and country

	Ministry	Quality Assurance Agency	Rectors' conference or similar	CBHE Provider	other	ENIC/NARIC body only	total per country
Austria	1		2				3
Belgium	2			2	1		5
Bulgaria	1	1				1	3
Cyprus	1	1					2
Czech Republic	1			1			2
Germany*	7	5	1	1			14
Denmark	1	2					3
Estonia	1	1	1			1	4
Greece	1	1		2			4
Spain	1	2		2			5
Finland	1		2			1	4
France	1	2				1	4
Hungary	1			1			2
Ireland		1		2	1		4
Italy	1					1	2
Lithuania	1	1	1				3
Luxembourg	1						1
Latvia	1	1				1	3
Malta	1				1		2
Netherlands	1	3					4
Poland	1						1
Portugal			no respondents				
Romania		1					1
Sweden	1	1	1			1	4
Slovenia	1						1
Slovak Republic			no respondents				
United Kingdom	1			1	2		4
outside EU	2	1		1			4
total per institution type	32	24	8	13	5	7	

* The high number of participants from Germany is partly due to its federal structure (16 Länder) and its high number of registered quality assurance agencies (as of July 2012 there are 10).

Figure 3: Participation in the main survey (unique institutions)



The overall participation rate in the main survey is very satisfactory. There were, however, no responses from institutions or experts in Portugal and the Slovak Republic, and the low participation rates in Central Europe (Poland, Czech Republic, Slovenia, Hungary and Bulgaria) are also problematic and may produce minor distortions in the results and opinions collected.

3.7. Quality Control of Survey Results and Validity of Data

Owing to the nature of the research approach and different levels of understanding of CBHE and definitions used, the survey results had to be validated. Quality control included online desk research of the incidences of CBHE activities submitted by survey respondents and submission of the aggregated information about regulations and providers in each country to the respective national ministry of higher education for verification.

In the course of this process, a number of reported institutions were removed from the list, as they did not meet the definition of cross-border higher education employed in this study. For example, joint programs or double degrees were often included in lists submitted to the research team. In some cases, lists needed to be updated.

Where it has not been possible to find online data or have it checked by an organisation with requisite knowledge, there is some danger that the data gathered is not entirely up-to-date or correctly classified. In particular, differentiating between franchising and validation turned out to be a major challenge. The classification indicated by survey respondents turned out to be inaccurate in some instances, while in the majority of cases the type of CBHE activity was entirely unknown. The research team has consulted the websites of institutions, but information on whether a particular activity is franchising or validation is rarely disclosed by providers, and verification is occasionally made difficult by language barriers. In agreement with the European Commission the two categories of franchising and validation were merged due to lack of robust data.

Nevertheless, we expect that the extent of our desk research and surveys has yielded results that are comprehensive enough to allow us to discern overall as well as regional trends in CBHE provision.

3.8. In-depth interviews in four countries

In order to further elucidate the quantitative findings and trends that emerged in the main stakeholder survey, the European Commission and the research team decided to conduct qualitative interviews (by telephone or in person) with up to four stakeholders in each of four countries selected by the European Commission. The goal was to examine wider issues related to regulatory mechanisms and overall levels of provision, and to probe the potential roles that could be performed by quality assurance and transparency mechanisms. In short, the focus was on the interplay of regulation, provision and quality. The following cases were chosen:

- **Austria:** which has recently introduced a new approach to regulation
- **Cyprus:** which is a major receiver of CBHE
- **France:** which is both a receiving and exporting country
- **United Kingdom:** which is the EU's biggest exporting country and which has the longest track record in CBHE activities in Europe.

Each country case comprised up to four semi-structured interviews with ministry officials, representatives of quality assurance agencies and other experts, along with representatives of providers. The purpose of the discussions with officials was to examine the rationale for the selection or development of the particular form and function of the regulatory mechanisms currently in place to help understand the reasons for the patterns currently observed, as well as to analyse practices in transnational cooperation between institutions on quality assurance, including the role of EQAR and non-regulatory approaches to QA.

For each case the perspectives of exporting or receiving providers were taken into consideration, depending on the country concerned. The interviews with providers focussed on gathering information regarding their reasons for involvement (which, inter alia, would shed light on the issue

of whether provision is responding to specific market needs or more general deficiencies in higher education systems) and their perceptions of the influence of regulatory mechanisms.

3.9. Strengths and Limitations of the Methodology

Information on the phenomenon of CBHE activity in the EU is scarce and fragmented. While some countries maintain sophisticated databases of providers and oblige them to provide detailed reports of their activities, ministries in other countries have little information whatsoever. The major strength of the chosen approach, therefore, is the aggregation of data from a wide range of stakeholder organisations. This brings to light a comprehensive picture that one organisation alone could never provide – neither at the Member State nor at EU levels. Similar challenges exist with regard to the question of regulation. The expertise for regulation typically lies with responsible ministries and quality assurance agencies in the individual countries. Existing written documentation may be hard to access and analyse, as not all of it is publicly available, and equally difficult to assess without detailed knowledge of the administrative and legislative frameworks of each Member State. A comprehensive survey specifically targeting expert bodies is therefore an opportune means to aggregate data on the regulatory mechanisms in place in the EU Member States.

The methodology's strength is, however, also its weakness: it has to rely primarily on the information provided by stakeholder organisations or, more precisely, by those stakeholder organisations that have volunteered to share information in the main survey. In Member States where participation was limited to one or two organisations, and especially in cases where the Ministry did not participate in the survey, the data cannot be assumed to be comprehensive and/or necessarily reliable.

4. Mapping of CBHE Provision

4.1. Context Information

A review of the existing documentation of provider mobility and of the literature on the cross-border provision of higher education reveals two major global trends: provider mobility 1) from Anglophone to other Anglophone and non-Anglophone countries and 2) from North (industrialised countries) to East and South (transition and developing countries). The majority of cross-border higher education delivery – carried out primarily by Australian, British and U.S. institutions – occurs in emerging economies in Asia, Eastern Europe and South America.⁸ Of the EU Member States, the major exporters have been identified by one authority, in descending order, as the United Kingdom, Spain, France and Germany.⁹

The exporting activities of providers are generally determined by the interplay of push (e.g. need for revenue generation, expansion of cultural influence) and pull factors (e.g. unmet demands and/or lax regulations in the receiving countries). A key factor motivating providers from Anglophone countries, primarily from the United States and United Kingdom, to export CBHE activities to non-Anglophone countries is the growing spread and popularity of English as a global lingua franca.¹⁰

Besides the linguistic and cultural commonalities existing between former colonisers and their colonies that facilitate the export of CBHE activities (e.g. from Spain to Latin America), a key pull factor is the substantial unmet demand for higher education in many developing and transition countries, coupled with the existence of an aspiring middle class.¹¹

It is also important to take into account wider contextual factors in the development of CBHE. Many governments see higher education playing an important role in wider economic and political/foreign policies. Many countries are now encouraging their higher education institutions to internationalise their activities, recognising the economic, social and political benefits that will flow from it. More general government policies can also be encouraging of internationalisation, especially those which encourage higher education institutions to be more entrepreneurial. Finally, the development of more flexible forms of delivery, combining traditional and less traditional methods and taking advantage of recent technological developments also has a key enabling role to play in opening up possibilities for CBHE.

⁸ (OECD, *Internationalisation and Trade in Higher Education. Opportunities and Challenges*, 2004, p. 215)

⁹ (Naidoo: *Transnational Higher Education: A Stock Take of Current Activity*, *Journal of Studies in International Education*, September 2009; vol. 13, 3: pp. 310-330). Naidoo uses secondary sources to build a broad picture of importing and exporting countries.

¹⁰ (Martin/Stella, *Module 5: Regulating and Assuring the quality of cross-border providers of higher education*, 2011, p. 12)

¹¹ (Knight, *Higher Education Crossing Borders: A Guide to the Implications of the General Agreement on Trade in Services (GATS) for Cross-border Education*, 2006, pp. 52-53); (Witte, 2001, p. 4)

4.2. Mapping Information

This chapter presents a mapping of the intensity and spread of CBHE activity carried out in the 27 EU Member States. Prior to entering into a discussion of the findings, it should be noted that the data presented here may not cover all instances of CBHE activity in the 27 EU Member States, owing to 1) an increase in CBHE activity in recent years, 2) the volatility of some CBHE arrangements, 3) divergent and changing approaches to regulation, and 4) different levels of overall awareness.

To facilitate the reading of the maps, the reader should be aware of the following notes:

1) The following maps generally represent *instances of CBHE activity* between two unique institutions. By “unique institutions” we mean the individual institutions involved in CBHE, as opposed to “CBHE activities.” Thus, for the purposes of the mapping exercise, a franchising agreement affecting one bachelor’s program is, for example, treated the same way as a branch campus offering bachelor’s, master’s and doctoral degrees across five academic disciplines. Conversely, there are branch campuses that offer only a few programs and franchising or validation agreements between two unique higher education institutions that affect several degree programs. The following maps do not account for these differences in scale, unless indicated otherwise.

2) Colors are used consistently where possible. Specifically, blue area shading generally indicates **received CBHE activity** and green area shading or green symbols generally indicate **exported CBHE activity**. Mobility of people is represented by a human pictogram, whereas direction of student mobility flow is not depicted by the use of different colours, unless indicated otherwise. Red, orange, yellow and grey are used in different visualisations to denote different characteristics of CBHE activities or providers (e.g. type of CBHE activity or funding of institution).

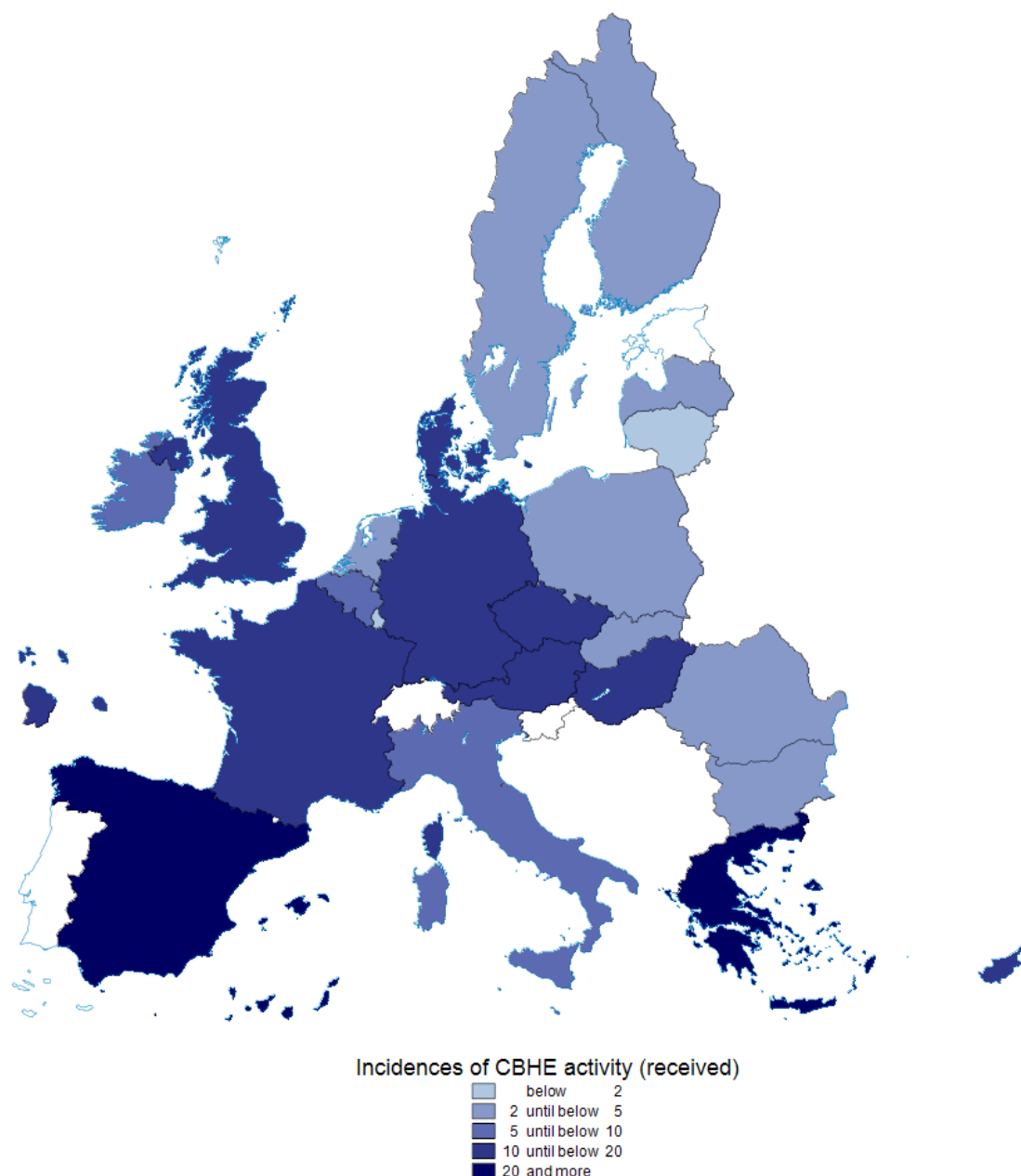
3) In general, the instances of CBHE per country are relatively few: in most cases, differences in the intensity or darkness of shading may represent rather small differences in the numbers of cases presented. Readers are asked to pay close attention to the keys provided below each map in order to appropriately interpret the results.

4.2.1. Mapping of Received CBHE Activity

Ad Figure 4: In total, 253 CHBE activities operating in 24 EU Member States have been identified¹². No providers have been found to be operating in Estonia, Portugal and Slovenia. The Member States receiving the highest levels of CBHE activity within their borders are Greece, Spain, Hungary and Germany. Low levels of CBHE activity can be observed in Lithuania, Bulgaria and Poland. Separate country maps for the major receiving countries are presented in chapter 3.3.1.

¹² This number and the following figures are based on the list of CBHE providers as of 22 August 2012.

Figure 4: CBHE activity carried out in the EU Member States at the country level

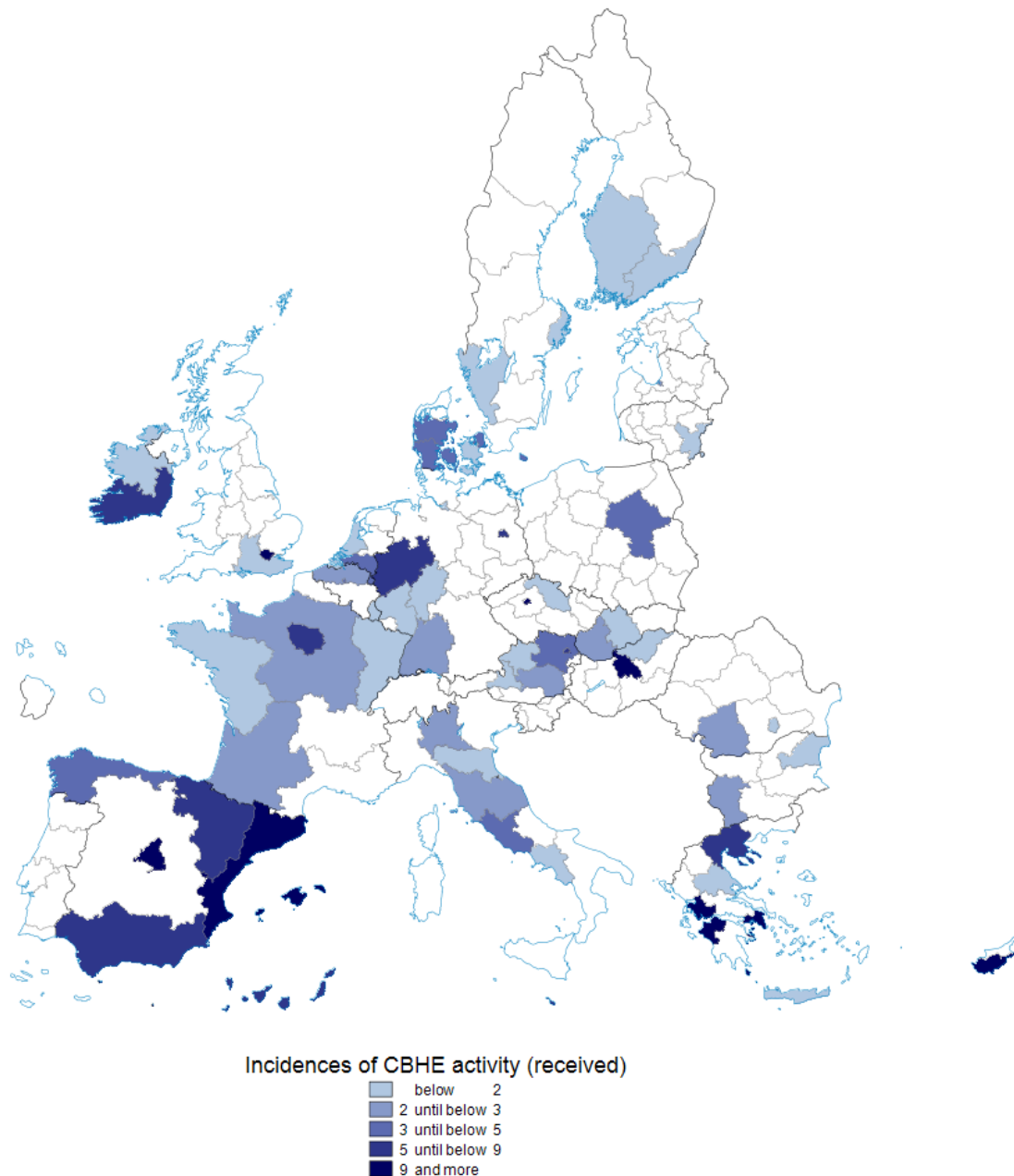


CBHE activity is concentrated primarily in Spain and Greece. Individual survey respondents claim in Greece the need for modernisation in higher education coupled to its extensive regulation produces considerable excess demand for higher education that foreign providers are trying to meet – despite the strict regulatory framework in place.

Ad figure 5: When considered at the region level, CBHE activity is found to occur primarily – or in some countries even exclusively – in the capital cities, which indicates that the political, economic and cultural hubs are especially attractive locations for foreign providers, presumably because demand is higher due to higher population density and to the reputational bonus of being established in a metropolitan centre. This pattern matches the geographic distribution of domestic higher education institutions, which are more likely to be found in capital cities and other urban

centres than in rural areas. The concentration of CBHE activity in heavily industrialised areas with great demand for an academic workforce further suggests that favourable economic and structural conditions may act as significant motivating factors for CBHE providers.

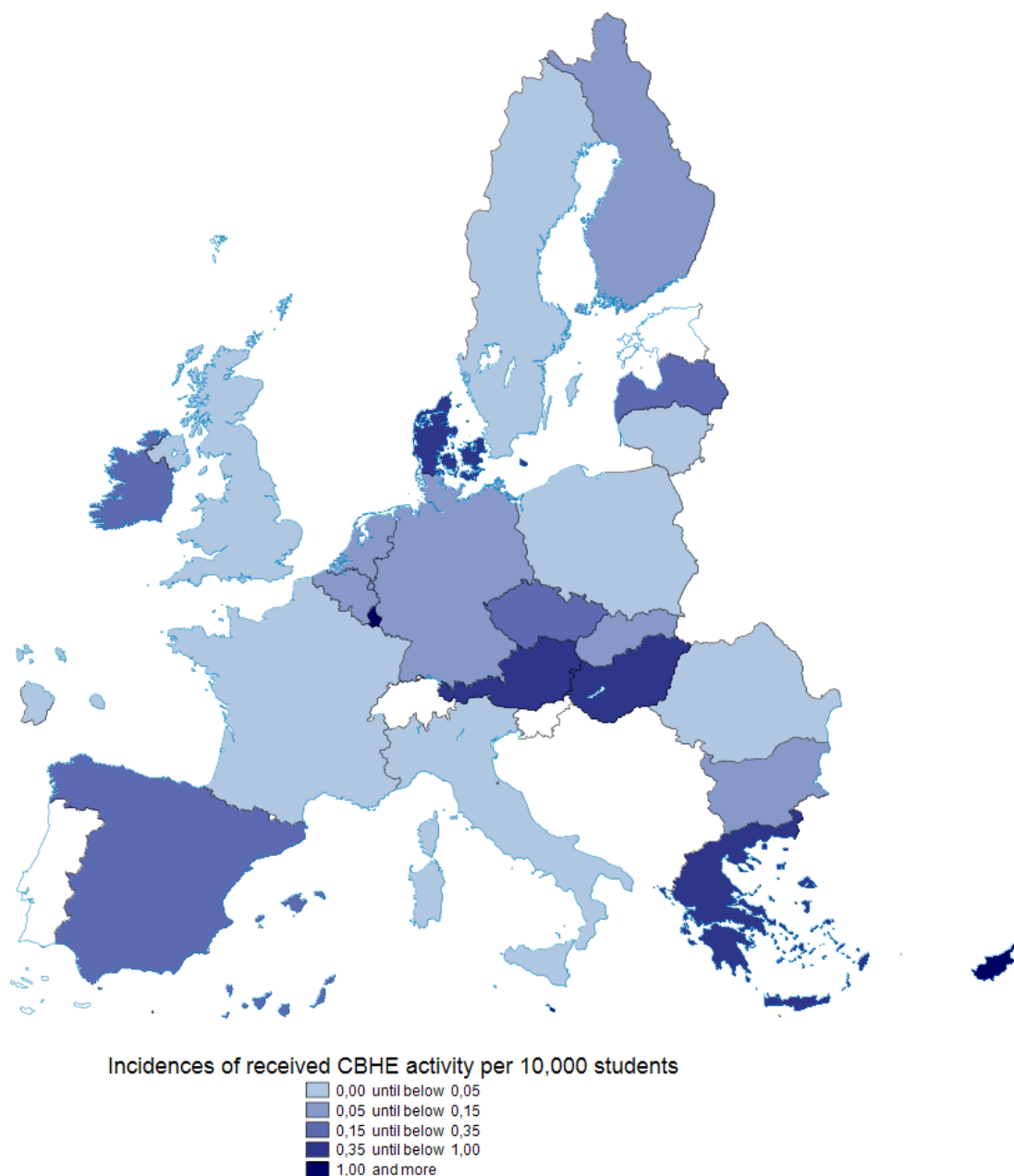
Figure 5: Instances of CBHE activity in the EU Member States at the region level



Nothing changes in the relative distribution of CBHE activity when *unique institutions* (no figure) receiving CBHE activities, rather than all instances of CBHE activity, are examined. Getting an idea of scale is problematic, however, if only absolute numbers are considered. Therefore, additional analyses against the backdrop of a country's overall higher education activity have been conducted.

Figure 6 presents instances of received CBHE activity relative to the total number of students enrolled in higher education institutions in the respective country.¹³

Figure 6: Received CBHE activity, relative to the number of students enrolled in higher education



This type of analysis brings to light the smallest states in the EU – Malta, Cyprus and Luxembourg, which also have smaller student populations – where CBHE activity is proportionately large. In Luxembourg, one single incidence of CBHE activity weighs very heavily in light of a student population of 5,400, producing a rate of 1,9 instances of CBHE activity per 10,000 students. Luxembourg is a special case also because it has just one domestic higher education institution,

¹³ Ideally, the research team would have included a comparison of the numbers of students enrolled in CBHE programs with the overall number of students enrolled in a country's higher education sector. Unfortunately, however, this data is not available for CBHE activity.

which means that CBHE activity has the potential to considerably diversify the higher education landscape, though limited by rather restrictive regulations. Engaging in CBHE activity in countries with less competition from other HEIs may constitute a considerable incentive for foreign providers. Whether that is a motivating factor for providers operating in Malta cannot be answered based on the data, but it boasts eight instances of received CBHE activity in relation to a student population of 11,700. The corresponding rate of CBHE activity per 10,000 is 6.8.

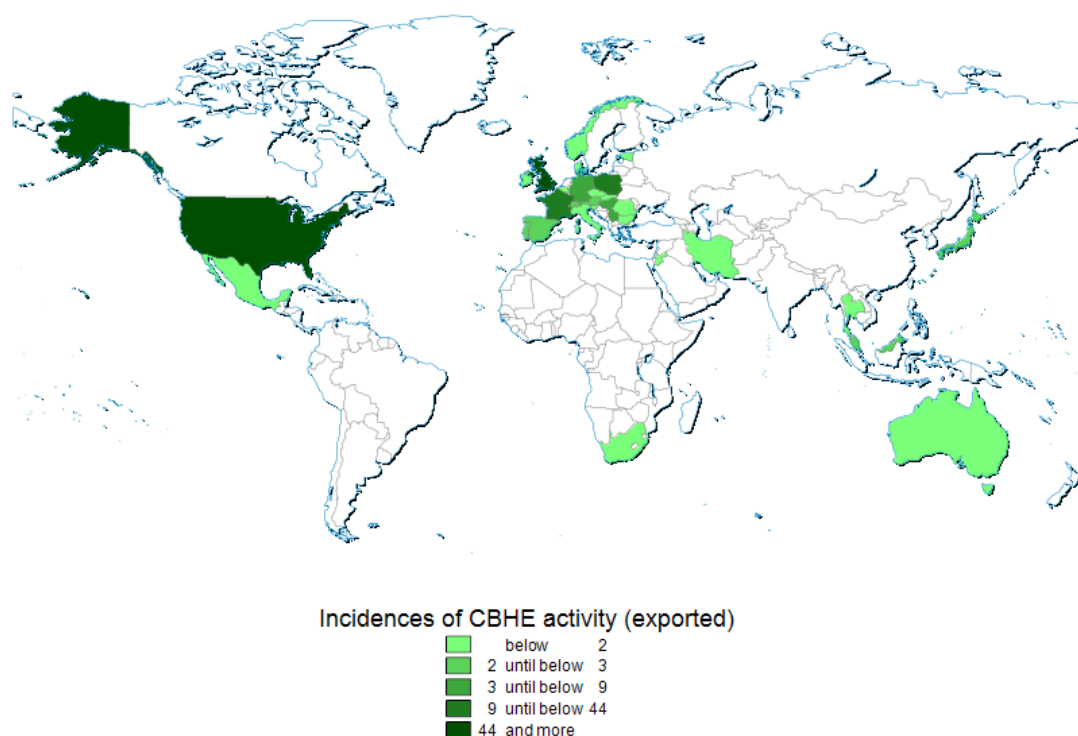
Apart from the smallest states, Greece, Hungary, Denmark and Austria transpire to be the major recipients of CBHE activity relative to the number of all students enrolled in higher education. In accordance with the global trends discussed previously, high levels of CBHE activity can be identified in four Southern states (Spain, Greece, Cyprus and Malta). High levels of CBHE activity can also be observed in Latvia, Hungary and the Czech Republic in Eastern Europe. Other Eastern European states (Estonia, Slovenia), however, do not receive any CBHE activity or exhibit low levels (Lithuania, Poland, and Romania). A closer look at the regulatory frameworks in place (see chapter 4 and annex 10) suggests that the low levels of CBHE activity in some Eastern European states are correlated with strict regulatory practices and requirements. However, this is not to attribute causality, especially as countries such as Greece receive a lot of CBHE activity despite having a heavily regulated higher education sector.

The question of subjects taught in the context of CBHE programs can be addressed only tentatively as the research team was unable to gather this information in a comprehensive manner. Information on subjects is available for roughly a third of all 253 providers and is in most cases based on information supplied by survey respondents that has not been verified by the research team. Extrapolating from the information that is available, the following pattern emerges: the vast majority of programs offered in the context of CBHE are in the areas of business and economics, sometimes in combination with information technology (about 80-85%). The rest divides up primarily between medical and health programs in the wider sense (including also physical therapy, osteopathy and psychotherapy) and specialized niche degrees (e.g. tourism, fashion, performing arts and theology degrees). Degrees in other Social Sciences, Humanities, Natural Sciences are not completely unknown, but usually offered only at a few branch campuses.

4.2.2. Mapping of Exported CBHE Activity

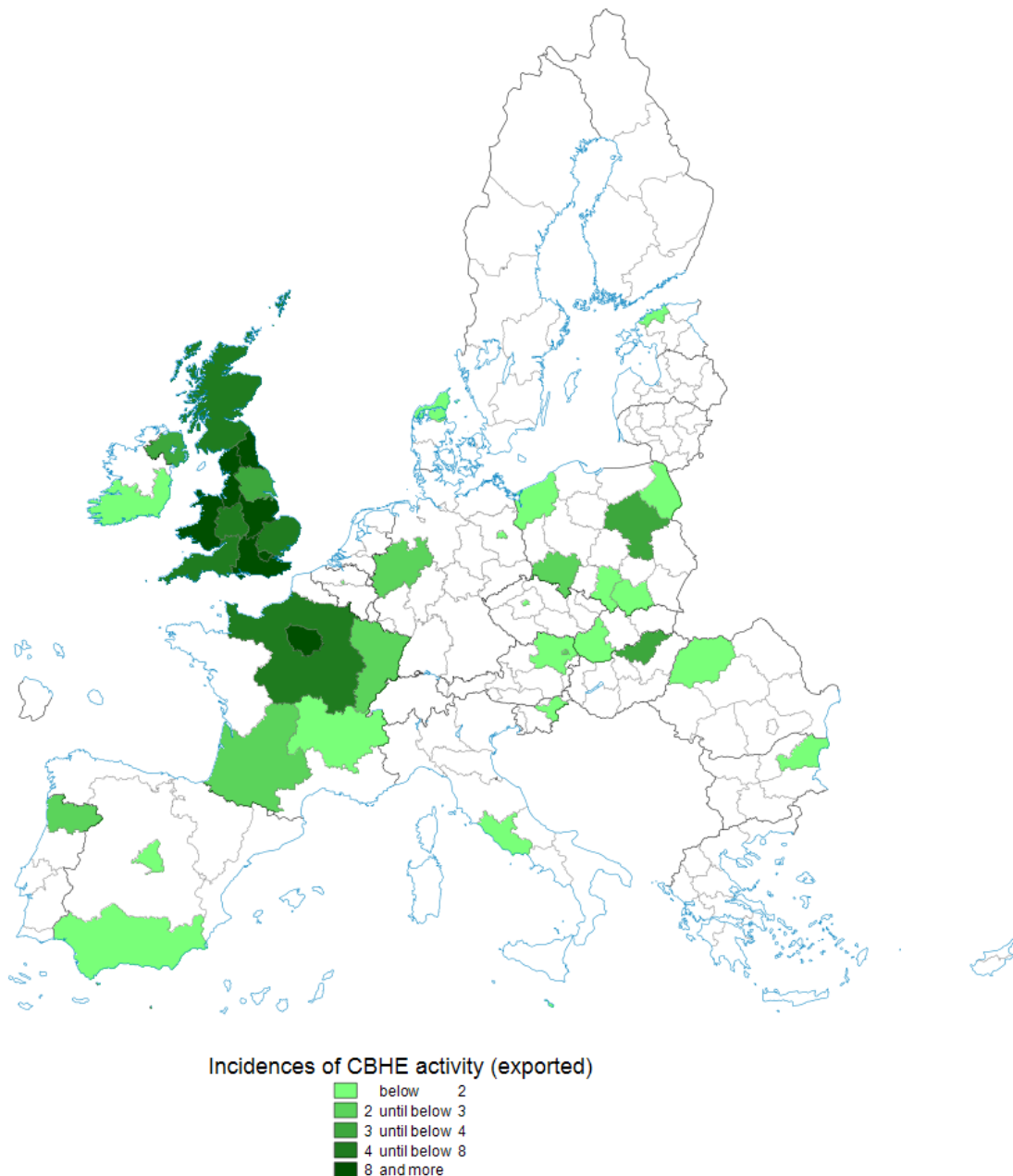
Ad figure 7: CBHE activities delivered within the EU Member States are carried out by higher education institutions based both inside and outside the EU (based in North America, Asia and South-Africa).

Figure 7: Instances of CBHE activity exported into the EU by providers worldwide



The major exporters of CBHE activity by far are the United Kingdom (142) and the United States of America (44), which parallels the finding that Anglophone countries dominate the export of CBHE activity. Providers from both countries export to countries all over Europe, although the UK is most active in Spain and Greece, and the U.S.A. in Spain and the UK. The two countries following the UK and the U.S.A. in the list of identified exporters are France (17) and Poland (9). These four major exporting countries are examined in more detail in chapter 4.2.6. As the focus of this study is on the CBHE activities of the EU Member States, the following visualisations are limited to the EU.

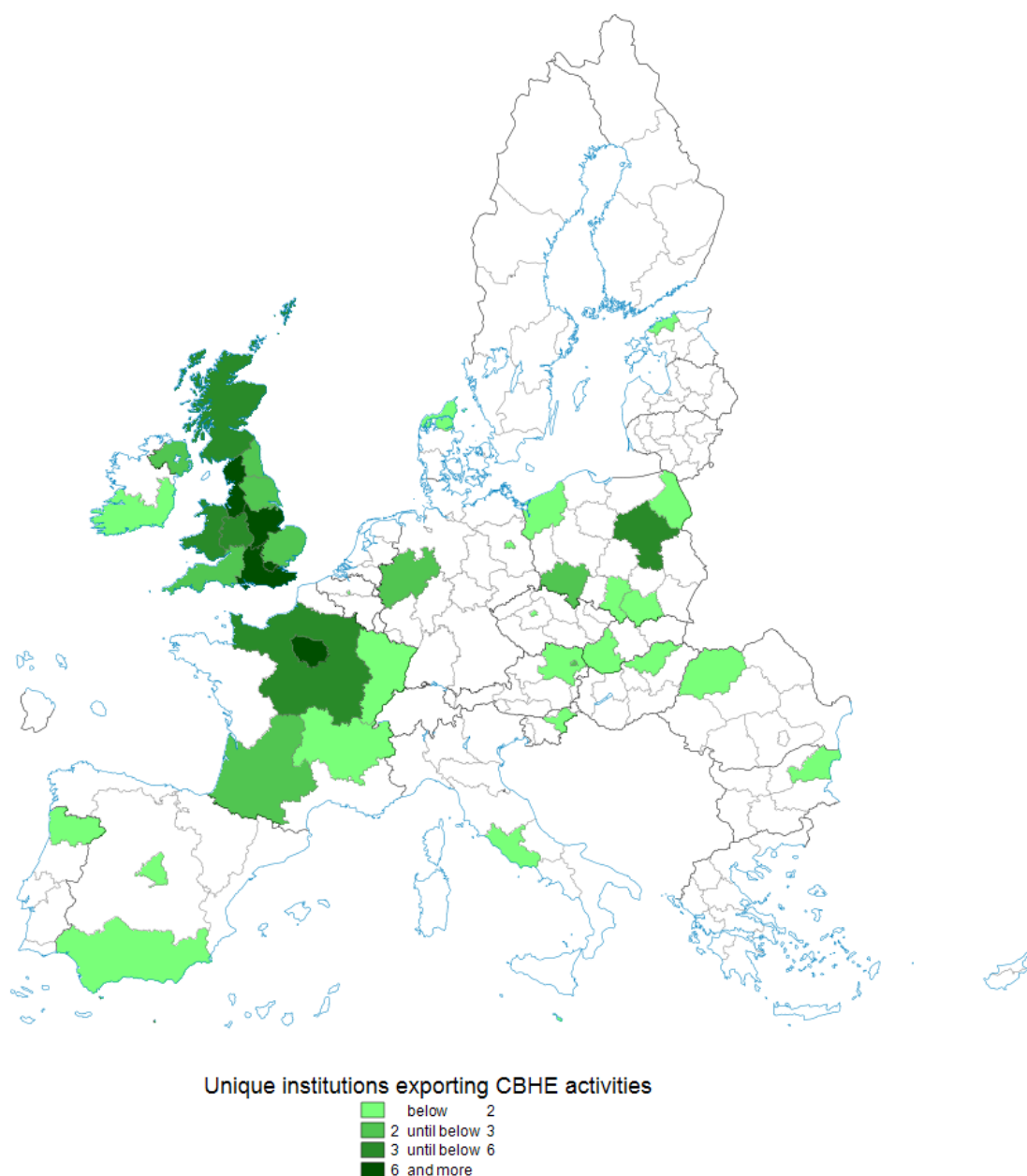
Figure 8: Exported CBHE activity of EU Member States at the region level



Ad figure 8: As with the pattern that emerged for received CBHE activities, an analysis at the region level reveals that many exporting institutions of higher education are located in the capital or big cities. This may be because an institution's location in a dynamic hub such as a capital city may encourage more entrepreneurial activities to flourish and may also reflect the international outlook which is more likely to exist in capital cities and well-developed regions linked into global economic networks. However, it is interesting to note that Europe's major exporting country, the UK, has institutions from all its regions involved in CBHE. This probably reflects the particular circumstances which have encouraged UK institutions to take part in CBHE as exporters, which include a tradition of international activity and government encouragement to be entrepreneurial and a search by HEIs to have new sources of income. The primary exporter is the University of Wales, which validates 43 programs in 14 countries, but other UK institutions export several programs to different institutions

abroad. Accordingly, the map looks somewhat different if only unique exporting institutions are considered. Thus figure 8 counts each institution only once regardless of the number of CBHE programs it may be involved in.

Figure 9: Exported CBHE activity at the country level (unique institutions)



Ad figure 9: The most exporting institutions of the UK (as well as of the EU) are situated in the North West, South East and London regions of England. Once again, in order to avoid any distortions produced by considering absolute numbers, a separate analysis has been conducted for the instances of CBHE activity relative to the number of all students enrolled in higher education.

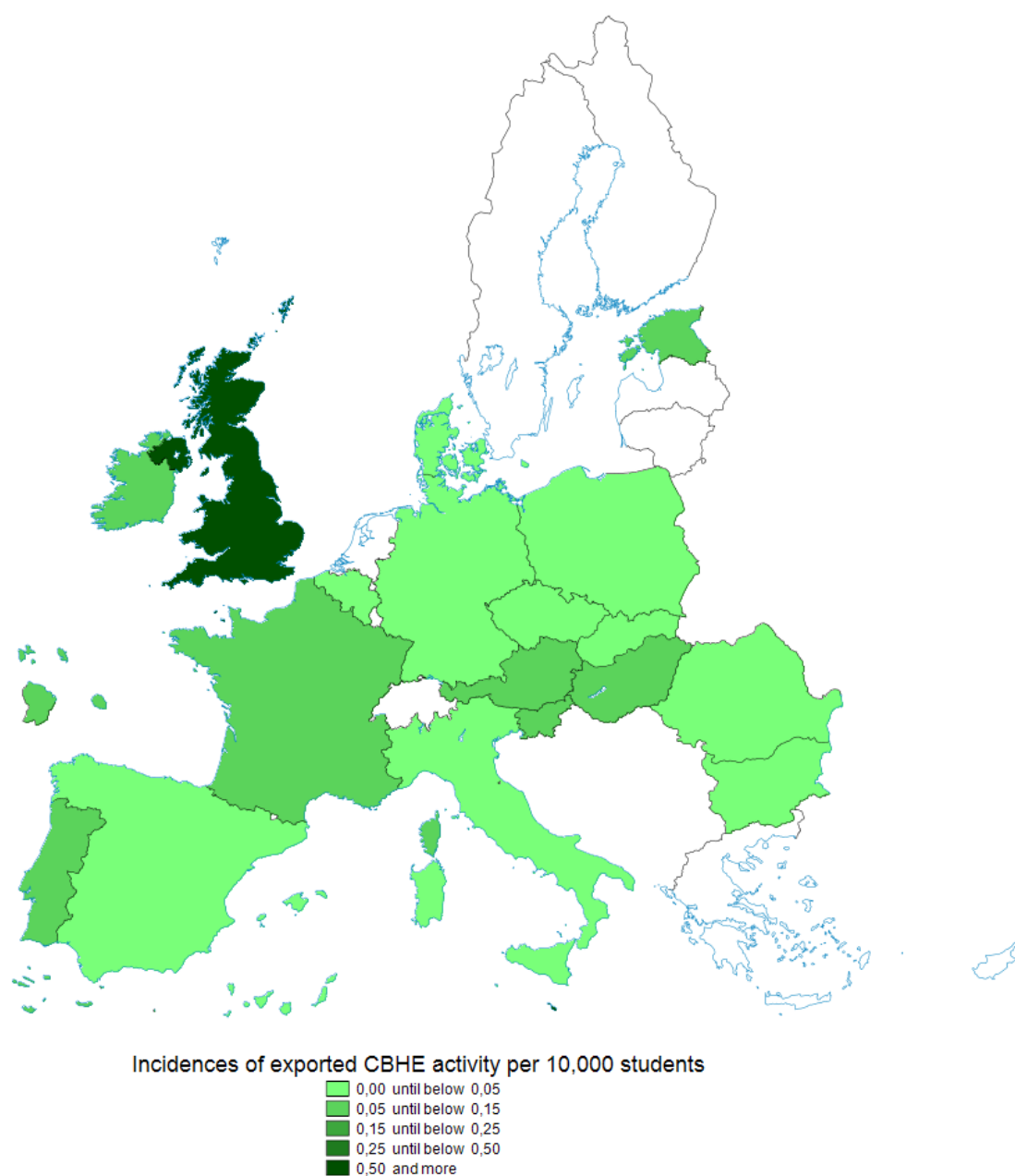
Internationalising higher education: the University of Wolverhampton, England – from ‘flying faculty’ to ‘supported delivery’

The University of Wolverhampton provides a good example of how universities in the UK approach the question of internationalisation. The University has a global approach, like UK universities in general, and in Europe has partnerships with institutions in Cyprus and France. For many years, it had recruited students from abroad, but around 2005 there were increasing indications that the global market in transnational education was set to grow substantially and there were various publications, such as Vision 2020 from the British Council, which drew attention to the opportunities which existed and also pointed out that the UK was at risk of losing its prominent position in global higher education. It was also clear that the foreign student market was volatile. UK universities at this time were also looking for alternative sources of income.

As a result, the University adopted an international strategy in 2006 and began to put this in place. Implementing the strategy required some effort on the part of the International Centre internally to change mindsets which up to that point had often seen transnational education as too risky. However, it was realised that the university would suffer in the long-term if it didn't internationalise its activities in a coordinated way.

Initially, a “flying faculty” model was used by the University to provide courses abroad, in which academic staff are flown in to foreign providers to teach courses. This allowed the University to control quality, but would have been challenging to scale up. As a result, a “supported delivery” model is now the preferred way of delivering franchising arrangements. (Franchising is preferred to validation as it allows closer relationships to be built with partners overseas.) Through the supported delivery model, the University not only checks on facilities, carries out due diligence and undertakes quality assurance checks, moderation or 2nd marking of students' work, amongst other things, but it also undertakes staff development. This is seen as critical as the quality of teaching is vital to the overall quality of provision, and poor quality teaching is perhaps the greatest risk to damaging the reputation of the University. The University is building on this experience and is now developing a Postgraduate Certificate of Education in International Academic Practice. Presently, all teaching staff in foreign providers have to be approved for delivering the University's courses, but in future it will be mandatory for staff teaching at branch campuses to have the PGCE qualification as well.

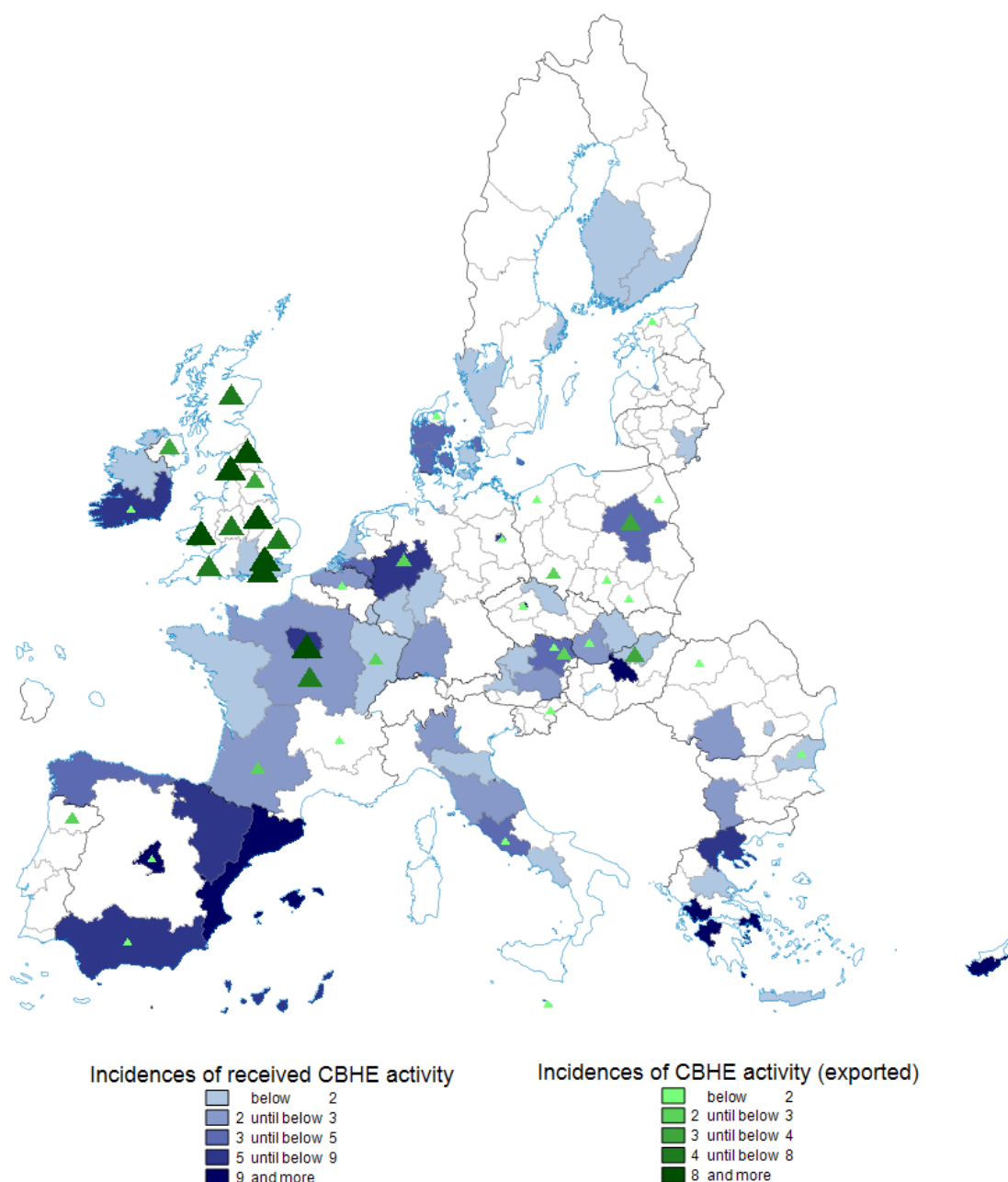
Figure 10: Instances of exported CBHE activity relative to the number of students



Ad figure 11: In this representation, too, the UK emerges as the primary exporter (exporting 0.6 institutions per 10,000 students enrolled in the UK), while Estonia, France, Austria, Hungary, Ireland and Slovenia also exhibit somewhat elevated levels of exporting activity. Austria and Hungary show increased levels of both receiving and exporting activity. Note: Due to a lack of data, some countries could not be included in this map.

In order to convey a more illustrative picture of overall provider mobility in the EU Member States, figure 10 presents both exporting and receiving CBHE activities by region. An inverse relationship between exporting and receiving activities is notable in the United Kingdom on the exporting side and in Greece, Spain, Cyprus, Denmark and Italy on the receiving side.

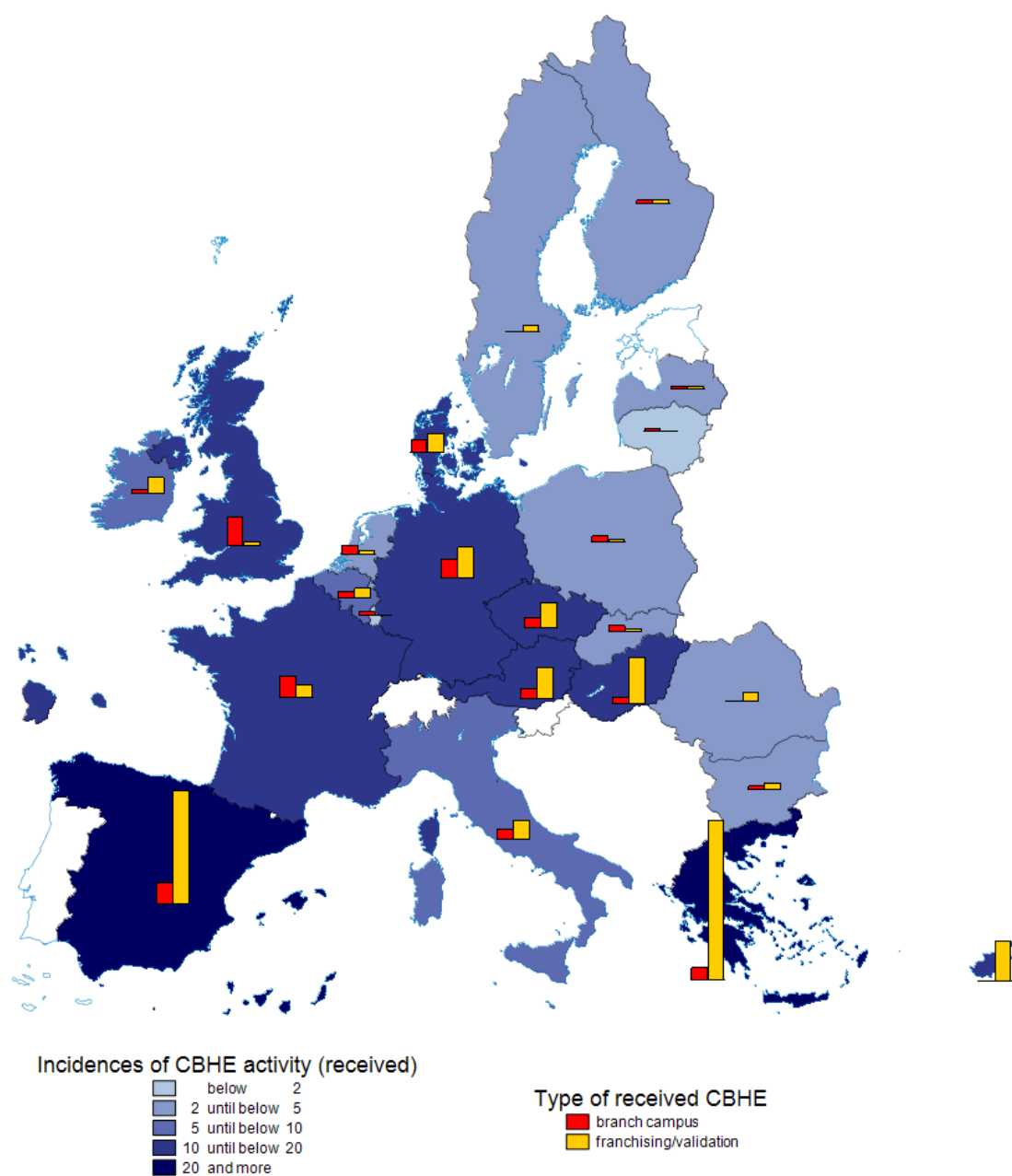
Figure 11: Received and exported CBHE activity of the EU Member States at the region level



4.2.3. Types of CBHE Activity

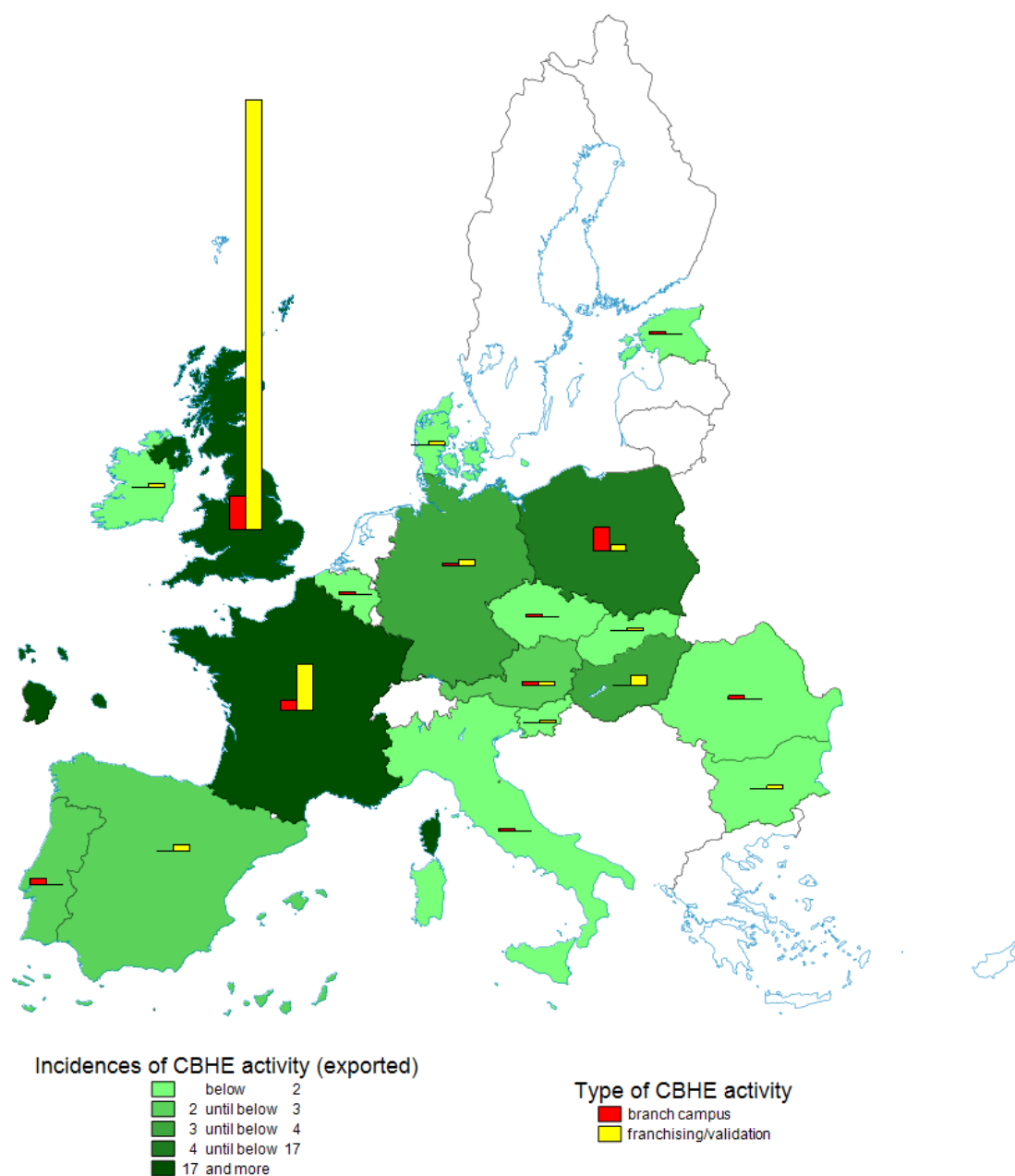
In the list of providers aggregated for this study, the combined category of franchising and validation clearly outweighs branch campuses. While the research team has not been able to aggregate robust data on the motivations to engage in one type of CBHE activity rather than another, it can be assumed that the comparatively “light footprint” required for franchising/validation is one reason for the imbalance.

Figure 12: Received CBHE activity by type of activity



Ad figure 12: The analysis of the distribution of the different types of received CBHE activity shows an apparent predominance of branch campuses in the United Kingdom, France, Poland, the Netherlands and the Slovak Republic. Everywhere else, franchising/validation are more common, especially so in the major receiving countries Greece and Spain.

Figure 13: Exported CBHE activity by type of activity



Ad figure 13: The distribution of exported CBHE activity by type is somewhat distorted by the extensive validation activity of the University of Wales (43 instances), although the University has scaled back its activities in recent years following problems with its quality assurance arrangements in some cases, which has led to the termination of many of its validation agreements. CBHE activity in the form of franchising/validation agreements constitutes the vast majority of UK exports, whereas branch campuses are comparatively less common. Of the major exporters, only Poland's CBHE activity is dominated by branch campuses. The United States (no map) is the major exporter of branch campuses (28) to the EU, however. Serbia (3), Japan (2), Malaysia and Iran also operate branch campuses in the EU.

Establishing a branch campus: Megatrend University in Vienna

Megatrend University is a successful private university accredited in Serbia with about 26,000 students. Seeking to enhance its reputation and adopt a more international profile including the provision of higher education programs taught in English, it first opened a branch campus in London. Following the introduction of more restrictive regulatory policies in the United Kingdom, Megatrend University subsequently opened another branch campus in Vienna, where it offers bachelor's and master's degrees in economics and business administration. Austria has historically been Serbia's cultural gate to Europe and was therefore an attractive location for a branch campus.

Specific regulations governing branch campuses in Austrian law were one of the factors that influenced the decision to choose this type of CBHE activity. The new regulatory policies that were introduced in March 2012, which require all CBHE providers operating in Austria to possess accreditation from their exporting countries as well as to register with the Ministry for Science and Research, are perceived very positively by Megatrend as they offer protection against dubious providers and cover all necessary aspects of higher education provision.

There has been one case involving skepticism about Serbian degrees, where a graduate from Megatrend University was not admitted to a master's program in Austria because the institution was not aware of the existence of cross-border higher education and of Megatrend University in particular. After the official registration of Megatrend University, this case was positively settled. Although no other noteworthy problems have arisen, Megatrend University is currently pursuing accreditation in Austria.

A future cooperation with Franklin University in Columbus, Ohio is planned for a study program to be carried out in Austria. This will be an MBA program, targeted to people who already have professional experience. The American degree seems to be attractive in particular for people who are already in a job. A further advantage is that half of the courses will be taught by lecturers from Franklin University, thus making the program more "American."

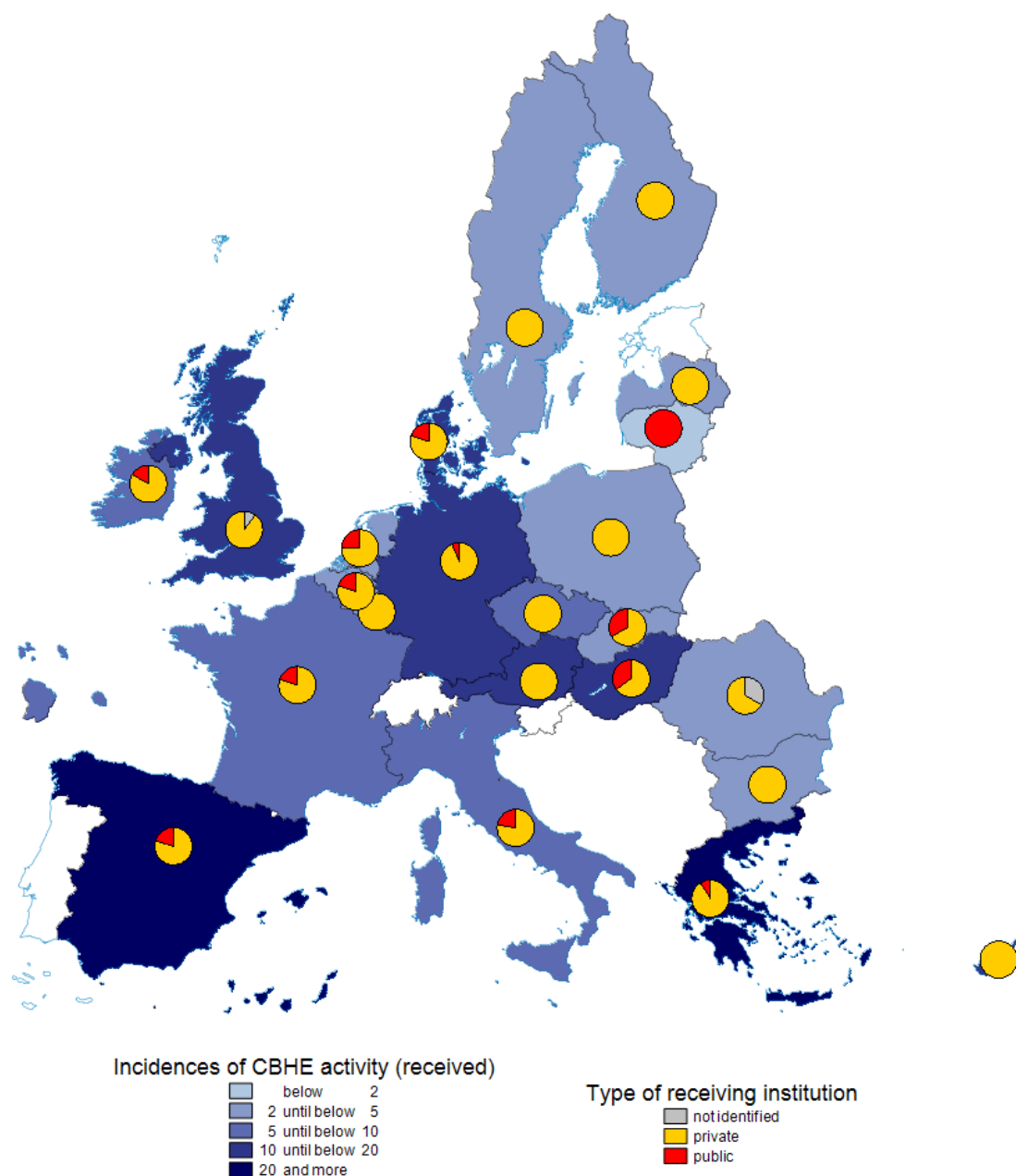
4.2.4. Analysis by Funding Type

Against the backdrop of diversifying higher education landscapes, the distribution of publicly and privately funded higher education institutions engaged in CBHE activities, both at the exporting and the receiving end, is of particular interest. In considering the findings presented in this chapter, one has to take the particularities of the higher education sectors in the EU Member States into account. Most states do not provide public funding to higher education institutions not issuing national degrees. On the exporting side, using public funding for CBHE activities abroad is usually not permitted by law. Programs offered in the context of CBHE activity are therefore commonly self-funded and may be financed through high tuition fees.

Another factor impacting the interaction of publicly and privately funded institutions in the realm of CBHE is the approach to higher education. In some states, such as the United Kingdom or Ireland, public higher education institutions charge high tuition fees even from their own students, whereas

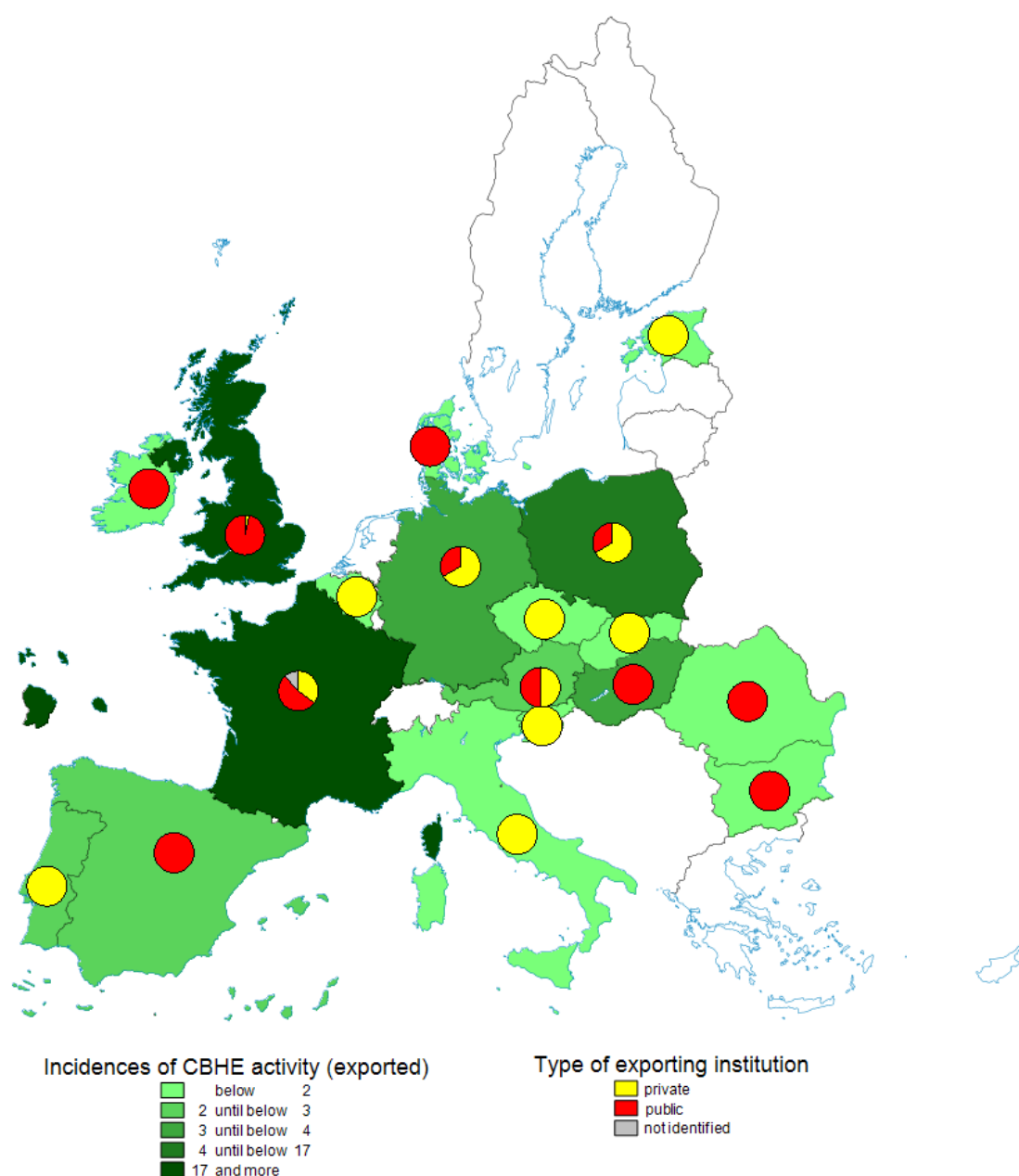
tuition fees are considerably lower in other states (such as the Netherlands) or non-existent. These different approaches to higher education are bound to produce different approaches to and policies regarding CBHE – both received and exported.

Figure 14: Funding of receiving CBHE institutions



Ad figure 14: The vast majority of received CBHE activity in the EU Member States occurs at privately funded institutions, although cooperation with public receiving institutions is notable in particular in Hungary and the Slovak Republic. Exporting institutions cooperate with publicly funded receiving institutions also in Spain, Denmark, Ireland, Belgium, the Netherlands, Italy, Germany, Greece and Lithuania, albeit on a smaller scale. All partnering institutions in the Czech Republic, Cyprus, Bulgaria, Poland, Luxembourg, Latvia, Sweden and Finland are privately funded.

Figure 15: Funding of exporting CBHE institutions



Ad figure 15: The predominance of privately funded institutions is not reflected on the exporting side. The vast majority of CBHE activity is carried out by public institutions, most notably in the United Kingdom (bearing in mind that the University of Wales accounts for 43 of 142 instances of CBHE activity). Beyond the United Kingdom the funding of exporting institutions varies: whereas providers from Bulgaria, Romania, Hungary, Spain, Denmark and Ireland receive public funding, providers operating out of Portugal, Italy, Slovenia, the Czech Republic, the Slovak Republic, Belgium and Estonia are privately funded. In France, Germany, Austria and Poland the picture is mixed.

If considered in conjunction, the data for exporting and receiving institutions shows a high level of cooperation between public exporting and private receiving institutions. Whether revenue generation or the specific structure and regulations of the receiving country are the major driving factors behind this phenomenon cannot be determined in this mapping exercise, although the

underlying regulatory frameworks in place may offer some clues as to why certain types of cooperation occur in some places but not in others, which is discussed in subsequent chapters.

Ad figures 16 + 17: A closer look at the type of CBHE activity pursued by public and private institutions brings to light interesting findings: private institutions (at least those based in EU Member States) operate branch campuses more often than their publicly funded counterparts do, whereas validation tends to be the preserve of public institutions.

Figure 16: Exported CBHE activity of privately funded institutions by type of CBHE activity

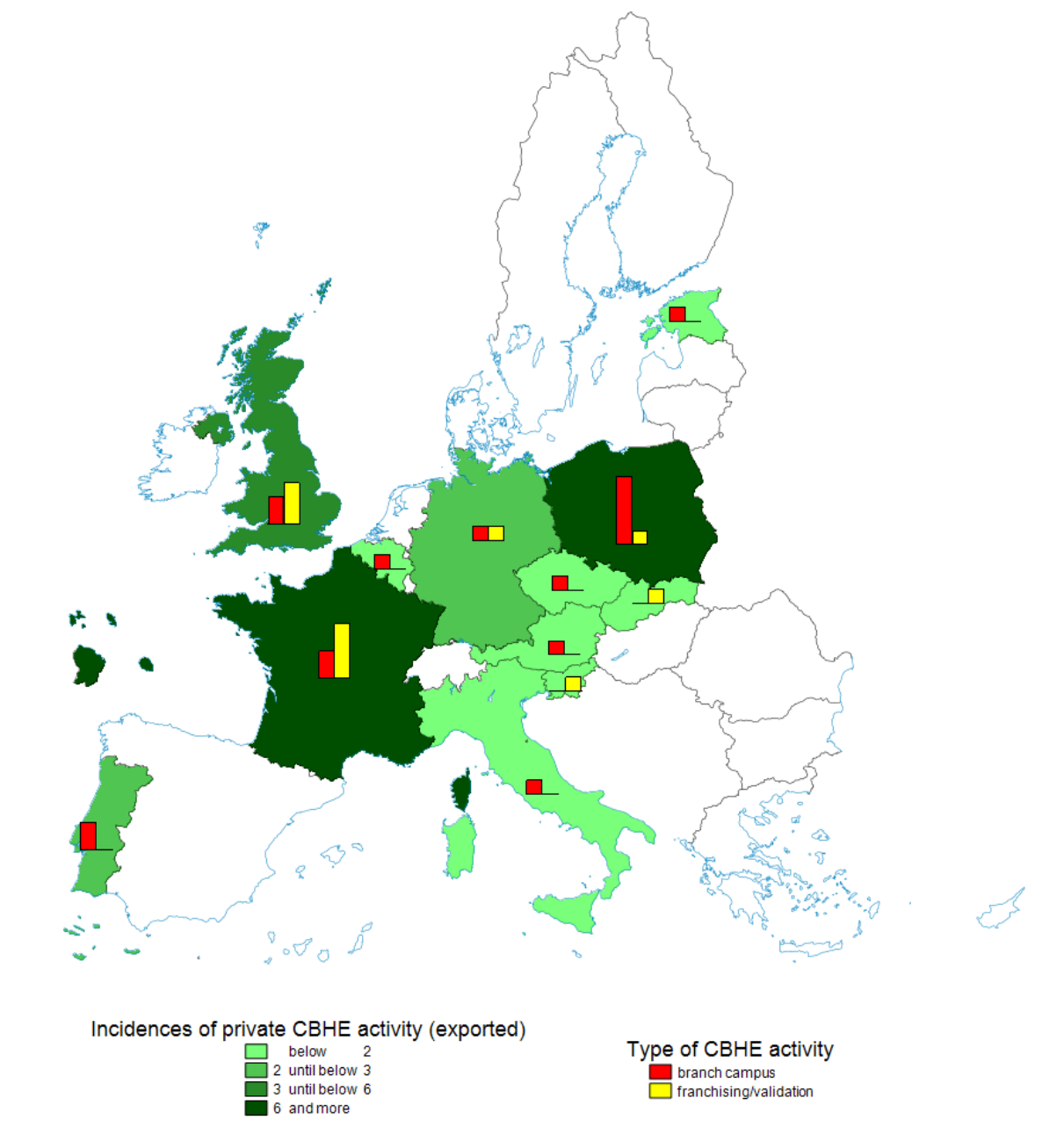
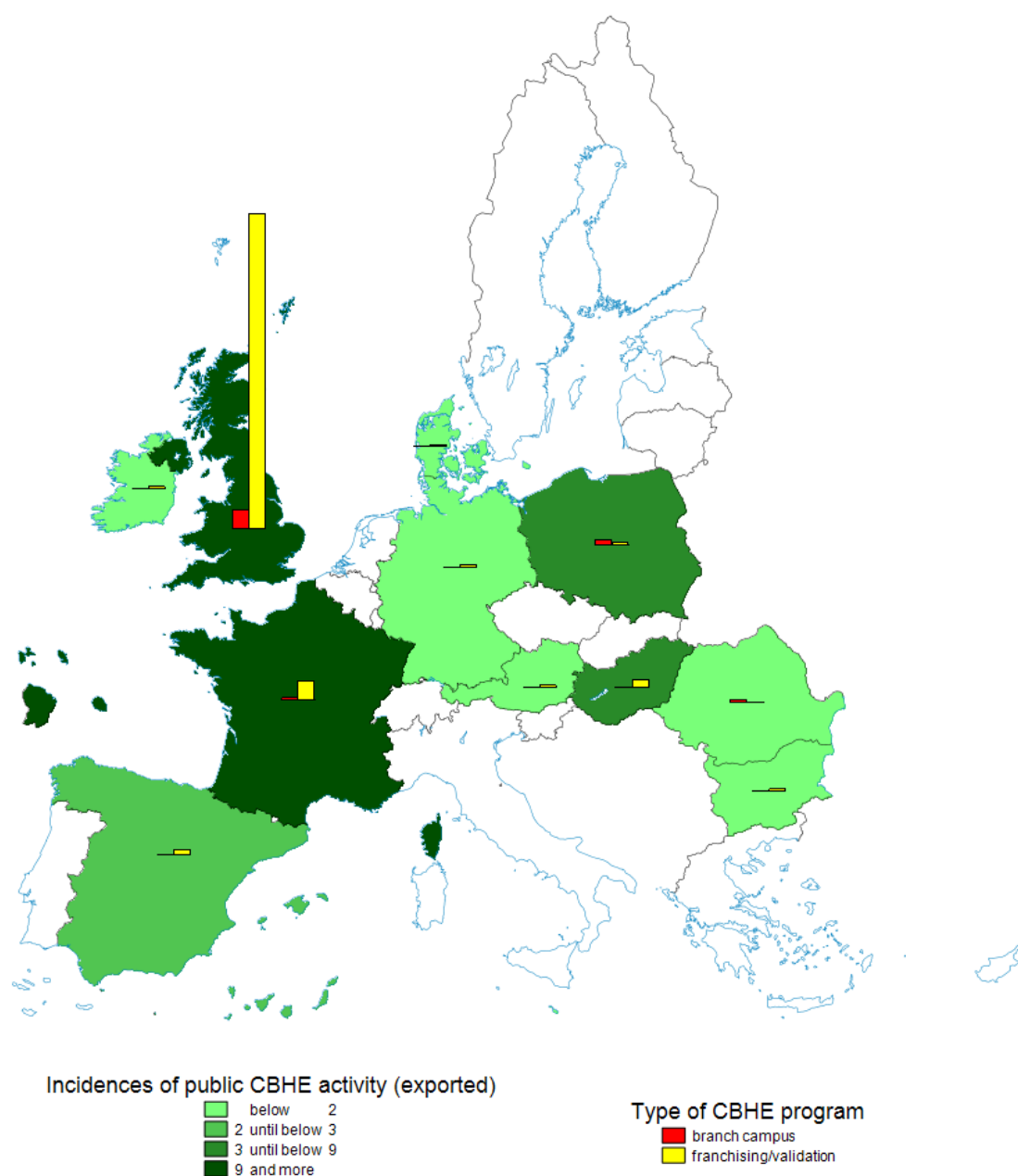


Figure 17: Exported CBHE activity of publicly funded institutions by type of CBHE activity



4.2.5. Analysis by Degrees Awarded

This section scrutinises the distribution of bachelor's, master's and doctoral degrees awarded in the context of CBHE activities.

Ad figure 18: An analysis of the receiving countries does not reveal major national differences. Bachelor's and master's degrees are most common, whereas doctoral degrees are awarded in the context of CBHE activity in France, Austria, Greece, Germany, Belgium, the UK, Hungary, Denmark, the Czech Republic and the Slovak Republic. Generally speaking, doctoral programs tend to be offered in countries with an overall higher level of CBHE activity, whereas in countries with just a few instances of received CBHE activity only bachelor's and master's degrees are awarded. The one major

deviation from this pattern emerges in Spain, where only bachelor's and master's degrees are awarded in the context of CBHE activities despite high overall numbers of CBHE activity.

Figure 18: Degrees awarded in the context of CBHE activity (receiving countries)

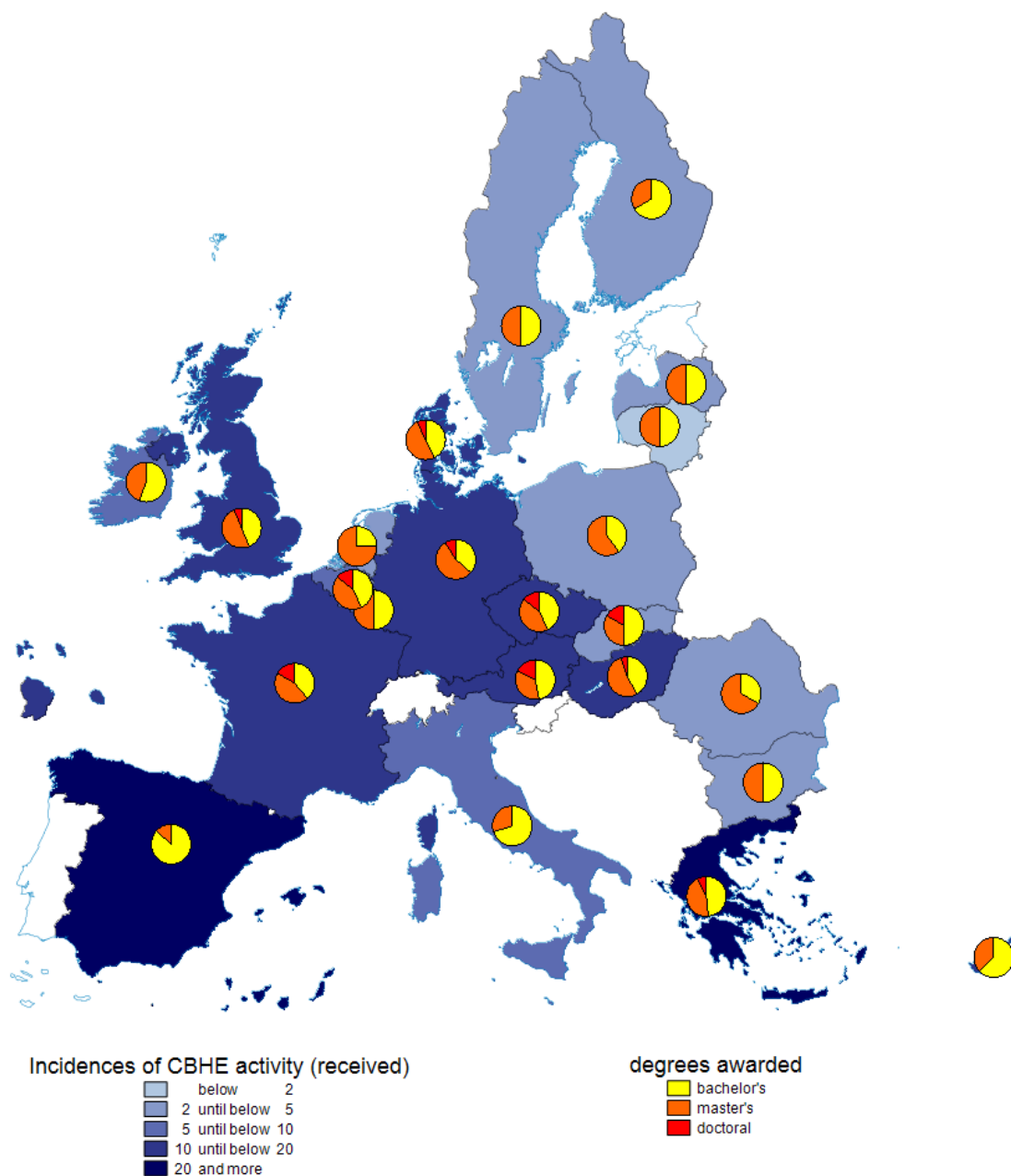
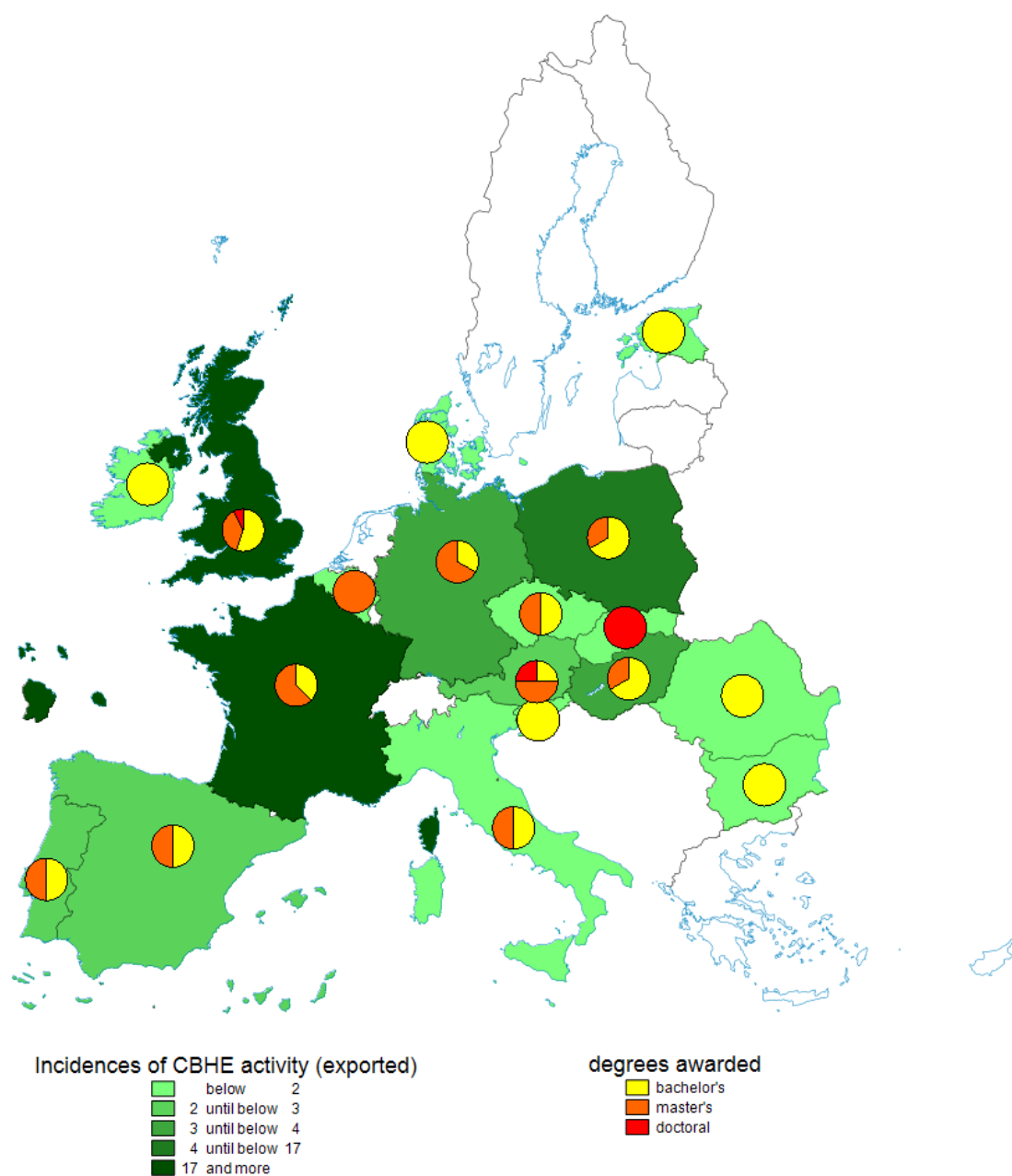


Figure 19: Degrees awarded in the context of CBHE activity (exporting countries)



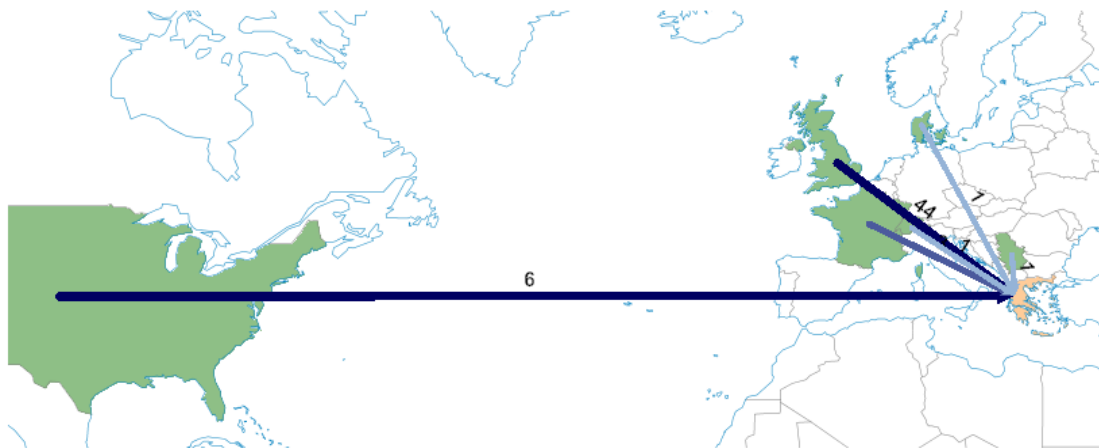
Ad figure 19: On the exporting side, only a few EU Member States host providers exporting doctoral degrees: most prominently the United Kingdom (15 instances), but also Austria and the Slovak Republic. Other providers exporting doctoral degrees to EU Member States are from the U.S. (3), Serbia, China and Iran (no map).

4.2.6. Major Receiving and Exporting Countries

In this section the major receiving countries (Greece, Spain, Hungary and Germany) as well as the major exporting countries (the United Kingdom, the United States, France and Poland) are examined in some detail. Each country profile contains a map illustrating provider mobility in- or outflow.

4.2.6.1. Greece

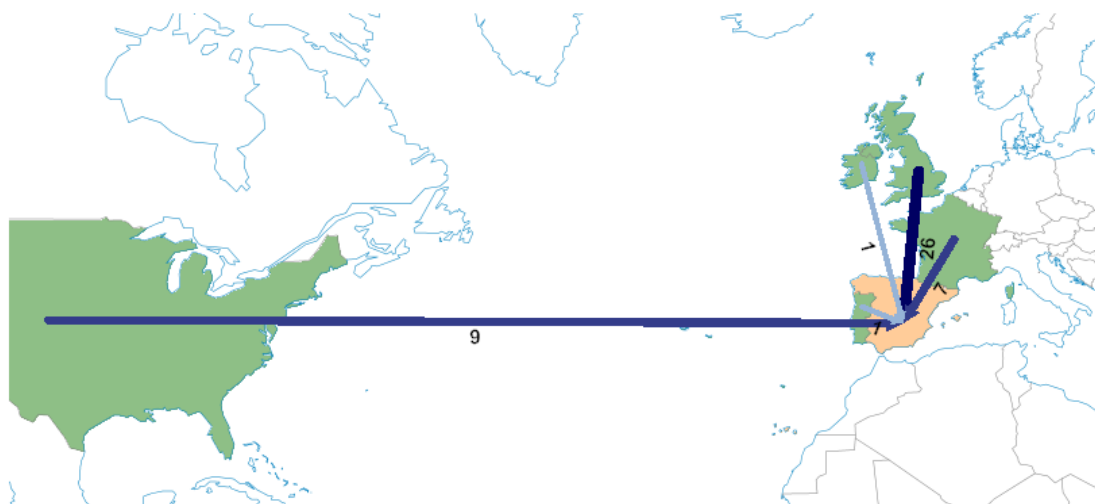
Figure 20: Received CBHE activity in Greece



Greece has been identified as the major recipient of CBHE activities (56: of these, 4 are branch campuses) in the European Union. The majority of CBHE activity originates from the United Kingdom. Six CBHE activities are received from the United States, three from France and one each from Switzerland, Denmark and Serbia. Greece is a special case insofar as it has very high levels of CBHE activity despite having a heavily restricted and regulated higher education system in place (see chapter 4). According to some survey respondents, a situation where demand exceeds the supply of higher education, including for less traditional forms of provision, attracts many foreign providers despite strict regulations. Many of these foreign providers cooperate with private institutions, which may not award recognised Greek degrees and therefore seek opportunities to issue foreign degrees by accredited institutions abroad. Hence, franchising and validation are the major CBHE activities delivered in Greece, and 51 of the 56 receiving institutions are privately funded. Degrees are awarded at bachelor's, master's and doctoral levels.

4.2.6.2. Spain

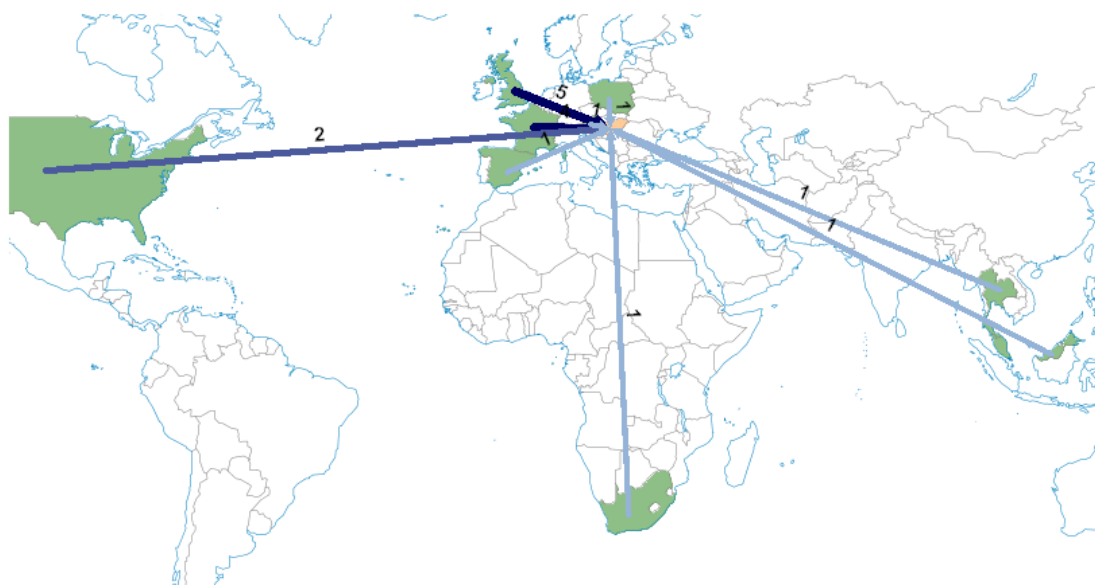
Figure 21: Received CBHE activity in Spain



Spain has been found to receive the most CBHE activities (44 instances) in the EU after Greece. The majority of CBHE activities carried out within its borders originate from the United Kingdom, followed by the United States and France. One CBHE activity each is received from providers in Ireland and Portugal. Apart from the Anglophone exports (see above), an element of geographic and cultural proximity is apparent. The majority of CBHE activity in Spain is carried out at small, private business schools in the form of franchising/validation and usually leads to the award of bachelor's degrees only. Seven branch campuses are also operated in Spain. Not a single one of the foreign providers found to be operating in Spain issues doctoral degrees.

4.2.6.3. Hungary

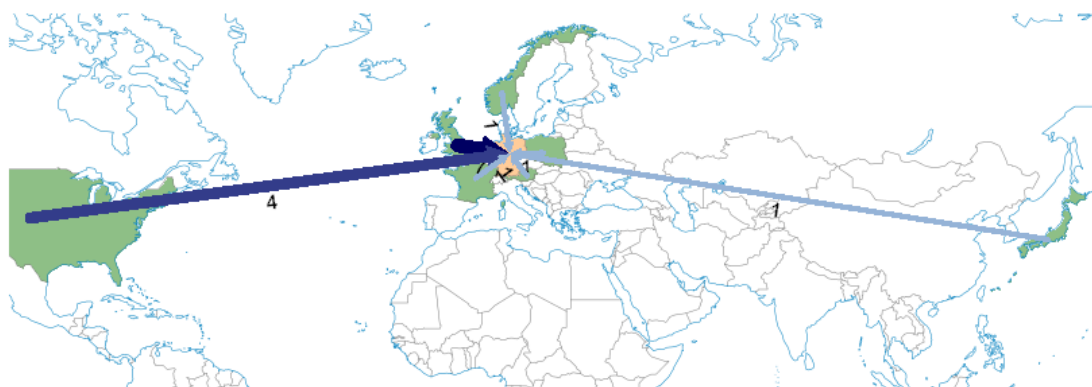
Figure 22: Received CBHE activity in Hungary



The 17 instances of CBHE activity (including 2 branch campuses) in Hungary originate from four continents. The United Kingdom and France are the major exporters, followed by the United States. One instance of CBHE activity each is received from Austria, Spain, Poland, South Africa (Missiology), Thailand (Buddhist Studies) and Malaysia (Business Administration). Of the 14 receiving institutions five are publicly and nine are privately funded. Bachelor's, master's and doctoral degrees are awarded.

4.2.6.4. Germany

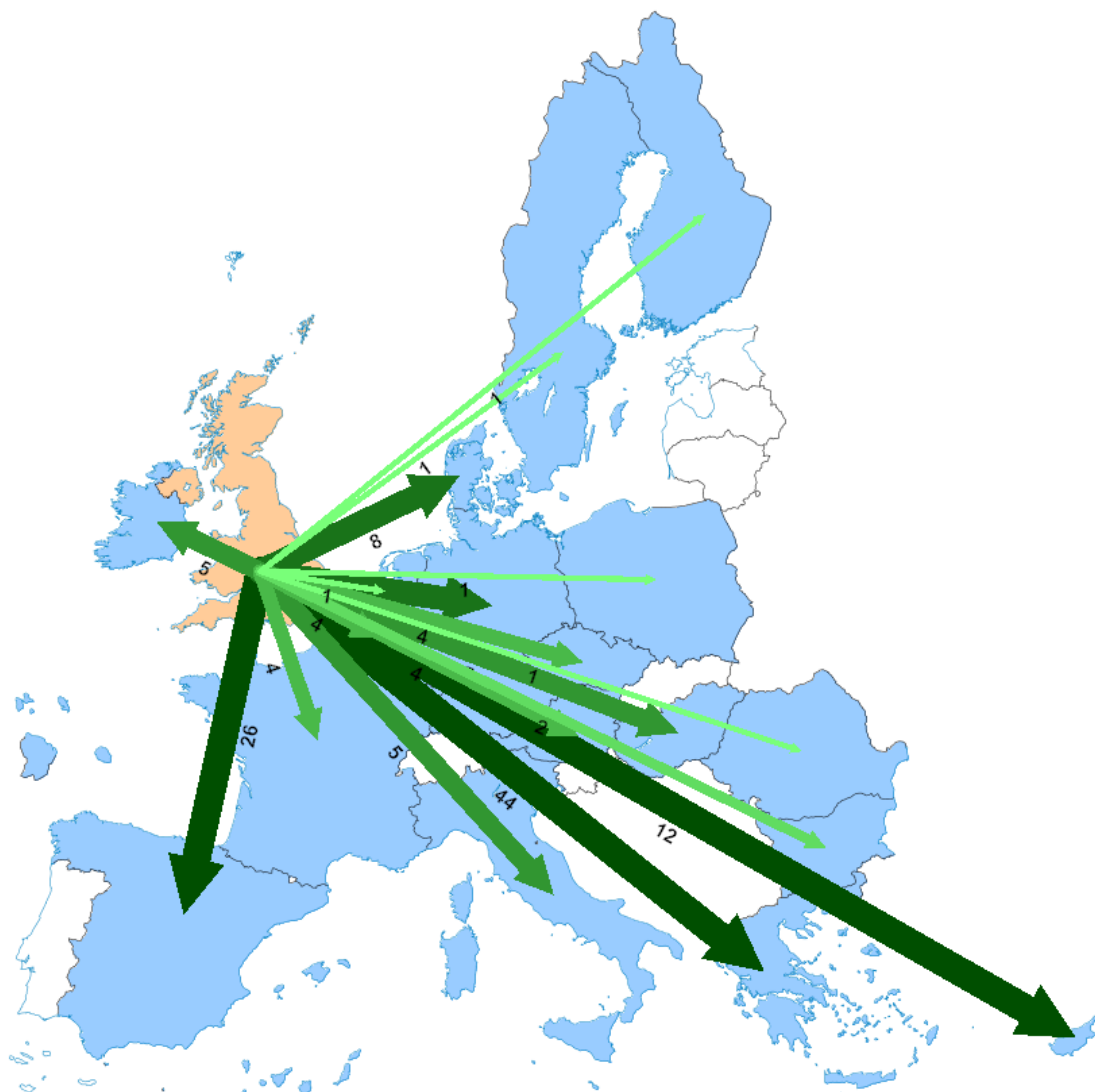
Figure 23: Received CBHE activity in Germany



After Hungary, Germany occupies rank four in the list of major receiving countries in the EU. Of the 16 received instances of CBHE activity, six are branch campuses. The primary exporter is the United Kingdom, followed by the United States. One instance of CBHE activity each is received from Austria, France, Japan, Norway and Poland. CBHE activity is concentrated in the capital city (Berlin) and the heavily industrialised North Rhine-Westphalian region with a high demand for an academic workforce. All receiving institutions in Germany are privately funded. Degrees are awarded at bachelor's, master's and doctoral levels.

4.2.6.5. United Kingdom

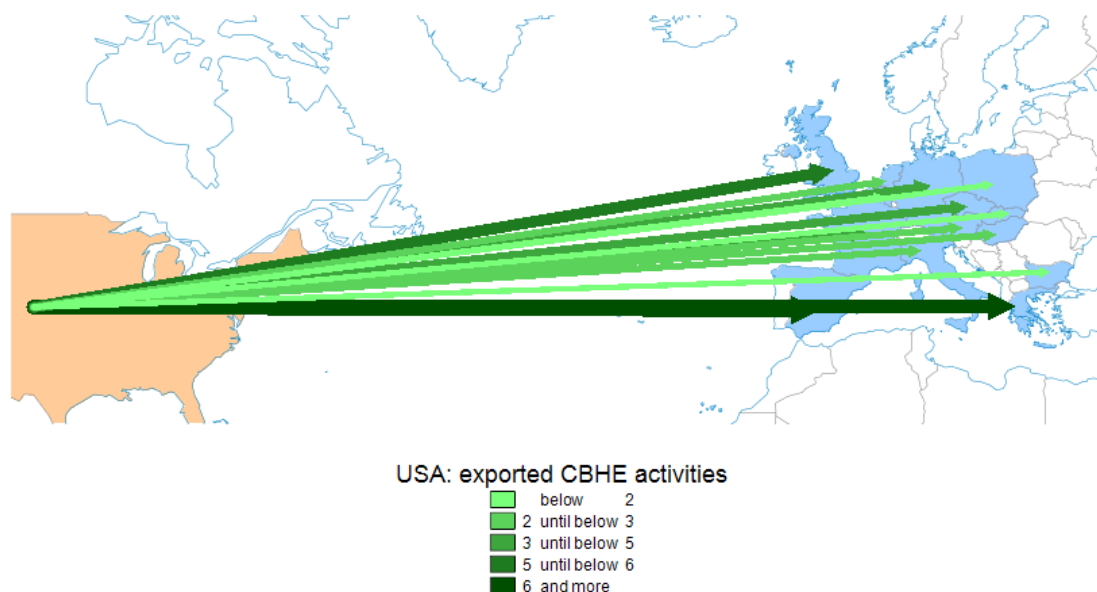
Figure 24: CBHE activity exported from the United Kingdom



As the major exporting country identified, UK-based institutions collectively carry out CBHE activities in most EU Member States. Providers from the UK are most active in Spain and Greece. UK exporting activity is conducted primarily in the context of franchising/validation. Ten branch campuses are operated in seven EU Member States. Degrees are issued at bachelor's, master's and doctoral levels, and the vast majority of CBHE activity (140) is exported by publicly funded higher education institutions.

4.2.6.6. United States of America

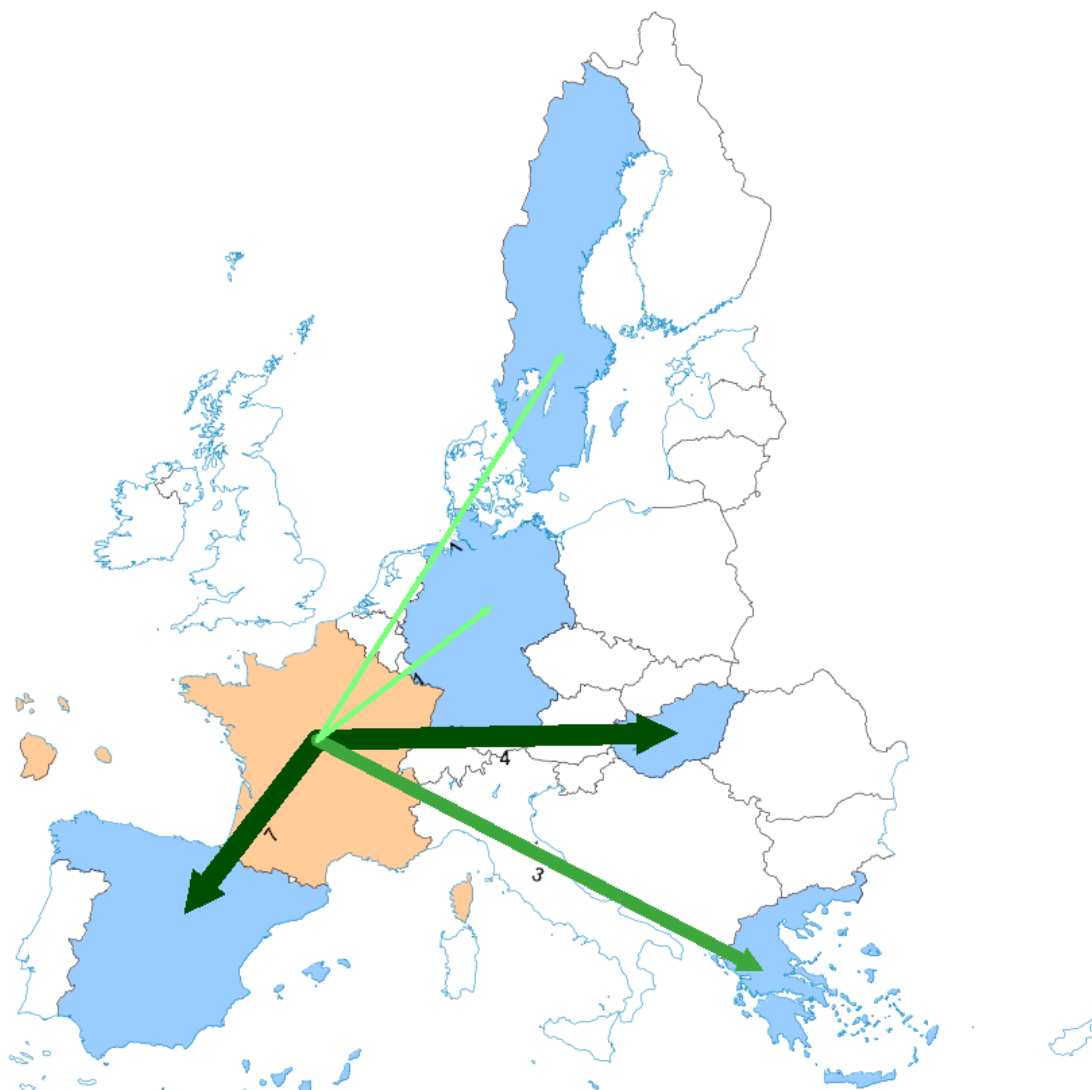
Figure 25: CBHE activity exported from the United States



The exporting activities of US institutions (44 instances) primarily target Western, Central and Southern Europe. No activity has been found to be carried out in the Scandinavian or Baltic countries. US institutions are the most significant exporter of branch campuses to the EU Member States, operating 28 in 15 countries. Most U.S. providers exporting CBHE activities to EU Member States are privately funded (32); only 12 are public institutions. Degrees are issued at bachelor's, master's and doctoral levels.

4.2.6.7. France

Figure 26: CBHE activities exported from France



Ranking third on the list of exporting countries, French-based institutions deliver 17 CBHE activities in the EU, primarily in Spain, followed by Hungary and Greece. One CBHE activity each is carried out in Sweden, Germany and Malta (not appearing on the map). French providers operate three branch campuses abroad, and 14 instances of CBHE activity are carried out in the context of validation/franchise agreements. Nine exporting institutions are publicly funded, eight are privately funded. Only bachelor's and master's degrees are awarded.

Exporting the American Way of Higher Education: The American Graduate School in Paris

Founded in 1994 by a small number of Paris-based American professors, the American Graduate School in Paris teaches international relations and international business with an American approach to teaching methods (more interaction between students and professors, debates, student participation, field trips.) It offers US-accredited degrees in an international environment. The faculty is very international and a combination of scholars and practitioners (diplomats). Two-thirds of its students are American nationals, the rest come from all over the world. Many of the students move to France to study at the American Graduate School in Paris. The school offers Master's and PhD-level degrees as well as some undergraduate non-degree programs for students wishing to spend a semester abroad for credit mobility according to the US model. Paris was chosen as the location because it is home to many diplomatic missions, intergovernmental organizations and NGOs. The regulatory framework did not play a role in these considerations.

Accreditation and Quality Assurance

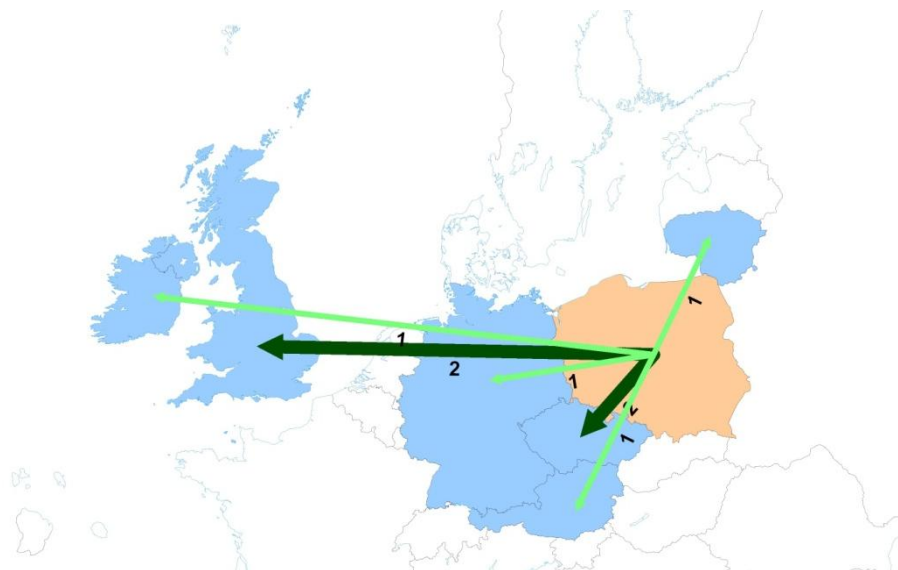
The School is an independent institution and develops its own degrees, which are validated and awarded by Arcadian University (Philadelphia Area). The American Graduate School's degrees are accredited in the US by the Middle States Association as degrees awarded at an "additional location of Arcadian University". The main QA process comes through the U.S. accreditation agency and the degree-granting institution, Arcadian University. There is regular supervision by Arcadian University of the qualification of employed professors and the syllabi that are being used. The choice of validation as the legal vehicle of CBHE was made to have more freedom to combine a U.S. model of education with contents that are more tailored to the French context as well as to have more autonomy to locally hire professors and develop a unique degree, rather than having to follow the exact curricula that would be taught at a domestic U.S. campus. The regulatory framework in France is not considered a problem since regulation is not too cumbersome.

Status in France

The American Graduate School in Paris is registered as an "Établissement privé d'enseignement supérieur" with the Rectorat de l'Académie de Paris and has the legal form of a Non-profit association of general interest (association à but non-lucratif d'intérêt général). There is an annual reporting to the Rectorat de l'Académie de Paris about professors, their qualification, the types of degrees being offered and the number of registered students at the institution. The legal status permits students to apply for student visa which allows them to work up to 964h per year (amounting roughly to 20h/week). Tuition fees are about 30.000 Euros for a two-year master's programme.

4.2.6.8. Poland

Figure 27: CBHE activities exported from Poland



Polish providers export nine CBHE activities to the neighboring countries of Germany, the Czech Republic and Lithuania as well as to Austria, the United Kingdom and Ireland. Of these, seven are branch campuses and two are franchising/validation agreements. Both public (3) and private (6) higher education institutions export CBHE activities. Degrees are awarded at bachelor's and master's level only.

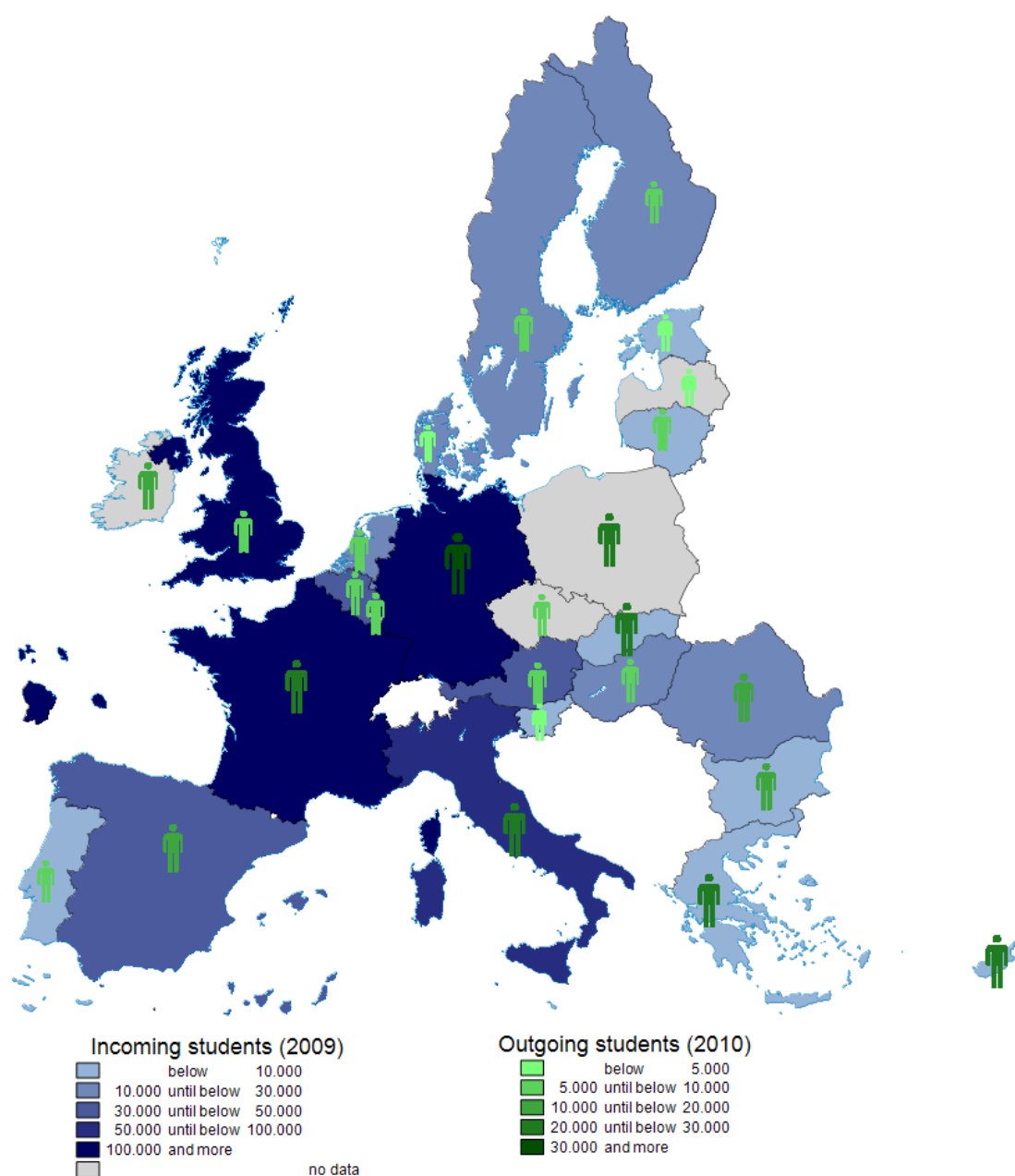
4.3. Relationships between Provider Mobility and Student Mobility

The internationalisation of higher education involved student mobility as well as provision mobility. Are there any relationships between the two?

For background information, figure 28 presents the numbers of incoming and outgoing students, where such data is available.¹⁴ The two EU Member States attracting the largest numbers of foreign students are the UK (369,000) and Germany (180,000). Germany also has the highest number of outgoing students in the EU (66,000), followed by France (30,000), Poland, Slovakia (both approximately 27,000), Italy and Cyprus (both approximately 26,000).

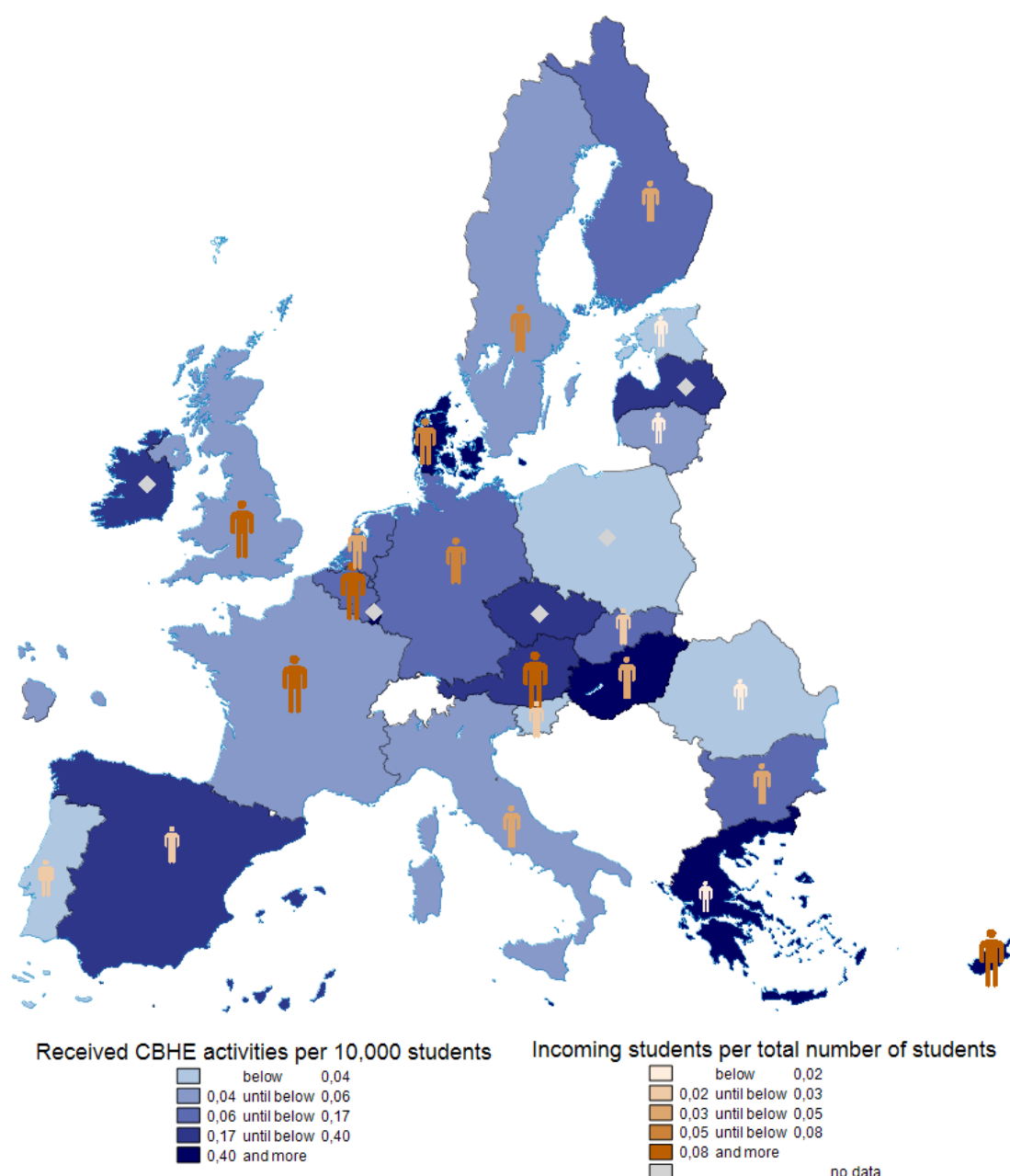
¹⁴ All student mobility data used is taken from Eurostat (2009 for incoming, 2010 for outgoing students).

Figure 28: Student mobility in the EU Member States



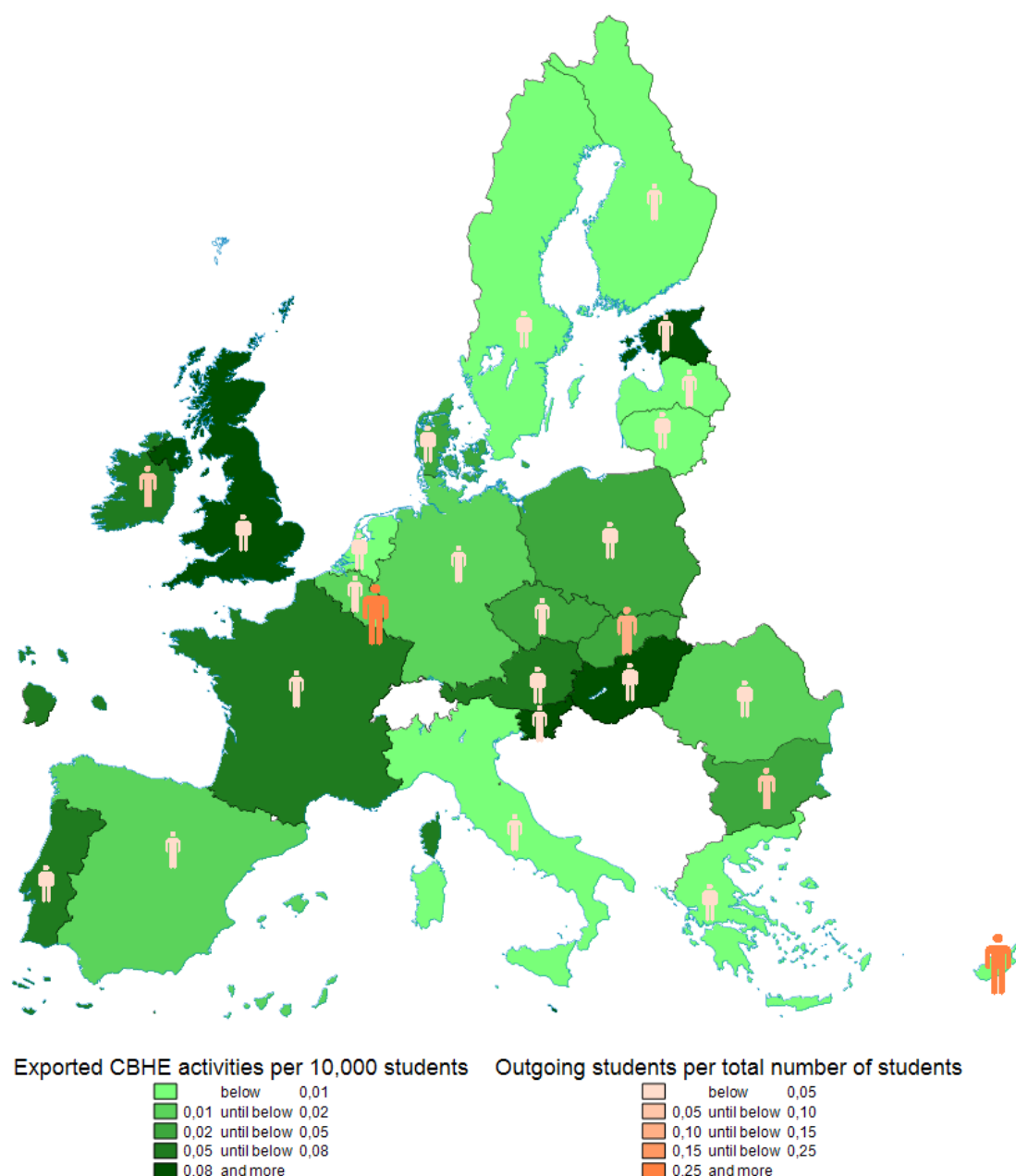
Once again, contemplating absolute numbers produces considerable distortions, as a positive correlation between a country's total number of students and the number of outgoing students can be expected. Figures 28 - 29 are therefore based on the numbers of incoming/ outgoing students relative to the total number of each country's students as well as the received/ exported instances of CBHE per 10,000 students for each country.

Figure 29: Relationship of student and provider mobility (incoming, receiving)



Ad figure 29: The data suggests that as incoming student numbers rise, CBHE received falls, although not consistently. Cyprus, Austria and Denmark exhibit high levels of both CBHE activity and incoming students. Romania has relatively low levels of both CBHE activity and incoming students. Most other countries for which data is available, however, conform to the trend of an inverse relationship, most notably the United Kingdom (the major exporter) and Greece and Spain (the major recipients). Naturally, there is more than one dimension to student and provider mobility, and several push and pull factors are at play for both. In order to fully understand the relationship between the two one therefore needs to take regulatory mechanisms and the particularities of different national higher education systems into account. For example, Scandinavian countries attract many foreign (degree) students because they have a wide selection of programs offered in the English language while at the same time they do not charge tuition fees for students from EU and EEA countries.

Figure 30: Relationship of student and provider mobility (outgoing, exporting)

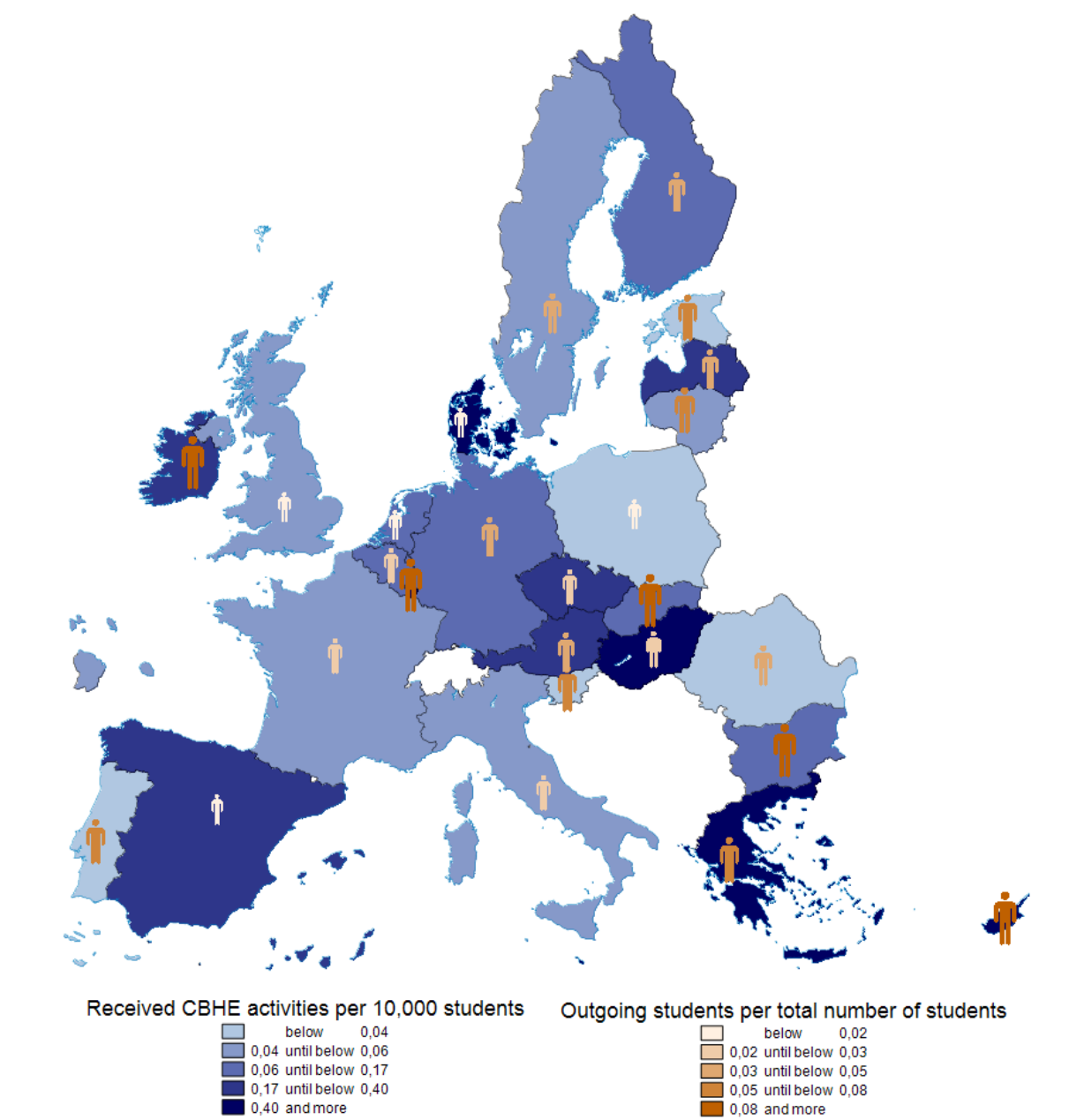


Ad figure 30: In examining the export of CBHE activities and the number of outgoing students, it is found that the tendency is for CBHE exports to rise as the number of outgoing students falls. The UK once again emerges as the country conforming most obviously to this relationship, though it can also be clearly observed in France, Austria, Hungary, Slovenia, Luxembourg, Estonia and Cyprus.

To fully understand the dynamics of student and provider mobility, the very diverse regulations and higher education systems of individual countries would have to be examined in great detail. Against this caveat and despite some outliers, however, the overall trend of an inverse relationship between student and provider mobility emerges for the EU Member States: higher education institutions in countries experiencing a high level of outward student mobility are less likely to engage in the export of CBHE activity on a large scale, whereas high inward mobility tends to coincide with a low level of received CBHE activity.

Ad figure 31: In terms of the relationship of received CBHE to outgoing student mobility, there is a statistically significant positive correlation ($r=.41$, $p < 0.05$) between the proportion of students studying in other EU countries compared to the total number of students of the same nationality and the number of received CBHE activities in a country normalised against the total number of students in the same country. This suggests that countries whose nationals emigrate in large numbers for purposes of degree mobility tend to be the same countries which attract a high number of CBHE activities relative to the size of their student population (although there are notable exceptions such as Spain). One of the factors accounting for the pattern of CBHE activities may therefore be students' perceptions of the quality and/or quantity of the supply of domestic higher education.

Figure 31: Relationship of student and provider mobility (outgoing, receiving)



4.4. Motivations for participating in CBHE

As noted above, the evidence obtained with regard to motivations has been limited. However, the in-depth interviews have shed some light on the question of whether, as suggested by the literature, revenue generation and branding are the main drivers.

First, the in-depth interviews remind us that CBHE involves partnerships between HEIs in different countries and that it is important to consider the motivations on both sides. To be sure, the extent to which such arrangements are partnerships of equals varies. One interviewee at a receiving institution stated that their relationship was ‘more or less a partnership’. At the same time, they also

commented that they wanted to grow their relationship into research areas and perhaps develop a 'campus arrangement' in the future. Furthermore, the initiation of CBHE can begin on the side of the receiving HEI. One exporting HEI reported receiving 10-20 requests for collaboration every two months or so, of which perhaps 1 would come to fruition. In Cyprus one private college reports seeking foreign institutions for franchising arrangements in order to attract Cypriot students who might otherwise venture abroad in pursuit of higher education. The academic year 2009-10 was the first since records began in which the number of students remaining in Cyprus to study exceeded the number of those leaving, possibly due also to the global financial crisis.

Second, the in-depth interviews show that there is a wide variety of motivations which interweave in complex ways and that it would be inaccurate to reduce CBHE simply to commercial considerations. CBHE offers the chance to offer new courses and also to develop an international experience for students. This can work both ways. Thus, the franchising arrangements between the UK's University of the West of England (UWE) and Alexander College in Cyprus are seen by the former (the exporter) as a way of internationalising their degrees for their students. Exchange arrangements have the disadvantage that they tend to add a year on to a UWE student's degree, whereas using their own degrees means they can integrate the overseas period without any impact on course length. Cyprus is now in UWE's international prospectus and they will actively market the opportunities to their own students during the 2012-13 academic year.

Third, although internationalisation strategies are becoming increasingly common, evidence from the in-depth interviews reminds us that the formation of links with individual institutions can be serendipitous but that they must also fit with the overall approach, ethos and educational philosophy of institutions.

4.5. Observations and Interpretations

It is clear from the evidence presented in this section that CBHE in EU as a whole is in its infancy. Instances of CBHE present a scattered and fragmented picture. The patterns we can observe reflect many decisions and considerations by individual institutions or faculties/departments exporting higher education services abroad. CBHE affects only a tiny fraction of students within the EU. This is not to say that it is insignificant for those students or institutions involved. Moreover, the literature indicates that CBHE is on an upward curve. This re-emphasises the point that this is a timely moment to be looking at CBHE: within Europe as a whole there is an opportunity to take action in a context where, in most countries, exporting and receiving CBHE is still at a low level.

Anglophone, public universities are the major exporters of CBHE

The findings clearly reflect the trend found at global level that exporting CBHE activities is dominated by Anglophone countries. It is evident that the findings parallel one of the key trends at the global level: that exporting CBHE activities is dominated by Anglophone states. This holds true even after taking into account the broad scale of activities by the University of Wales. In general private institutions tend to account more frequently for exporting branch campuses whilst public institutions tend to dominate the export side of validation and franchising agreements. This division may have

something to do with reputation, with public institutions carrying a more highly valued imprimatur, and also with private institutions taking a different view of investments in branch campuses.

Small, private business institutions are the typical receivers of CBHE

It is clear that receiving institutions tend to be mostly small and private. The programs that are run tend to be those with small “overheads” such as business courses which do not require investment in special physical facilities such as laboratories. They also tend to use English as the language of instruction, thereby appealing to the constituency of students who wish to equip themselves with the global lingua franca (of business). In terms of branch campuses, Europe does not have institutions on the scale found in the Middle East and Asia.

General lack of information on quality assurance

In terms of quality assurance, it is notable that there is often very little publicly available information on issues such as quality and accreditation on the receiving institutions' websites and almost none on the degree-granting exporting institutions' provisions for quality assurance.

Quality and quantity of provision in receiving country seem to be key factors in receiving CBHE

In a global perspective, the major receiving countries tend to be those where demand for programmes from institutions in the Western Hemisphere is high and where there are (structural) gaps and weaknesses in domestic provision. To test this pattern for Europe, the relationship between CBHE levels being received and outgoing student degree mobility (as an indicator of relative preference for foreign higher education) was analysed. This showed that the biggest receivers of CBHE tend to coincide with the biggest exporters of students percentagewise. Naturally there are exceptions to this, such as Spain, where other factors are at play such as the popularity of English. Students' perceptions of the quality and/or quantity of domestic higher education are therefore assumed to play a major role in the emerging patterns of CBHE provision.

At the same time, whilst in some countries CBHE is filling gaps during a process of modernization (e.g. in Greece and Cyprus), in others, it might be more a question of CBHE filling niche gaps in domestic provision or meeting excess demand in very specialised subjects (e.g. in Germany, Austria, Denmark and France). Each country has a specific pattern of incoming CBHE shaped by unique combinations of factors.

Need to charge fees may also influence CBHE patterns

In examining patterns of CBHE provision, the fact that CBHE is normally self-funding (owing to restrictions on the use of public funding) must be regarded as an important factor. Tuition fees are likely to be high and therefore in countries where students pay little or nothing for higher education the likelihood of CBHE being attractive would be expected to diminish. This factor may be the case in Sweden, for example, although evidently this factor is overridden by other factors in countries such as Austria, Denmark and Germany which have low or no tuition fees but show a relatively high incidence of received CBHE. The need to raise high tuition fees may also be one of the reasons why

most received CBHE takes place at private institutions, and may also be part of the explanation as to why capital cities are key locations of CBHE since they are likely to have the best “markets” for students willing and able to pay tuition fees.

Motivations for engaging in CBHE are varied and receiving institutions are not simply passive recipients

It would be wrong to reduce the motivations underpinning CBHE to a simple commercial calculus. Whilst the profit motive is a driver for rogue providers and degree mills, there is evidently a number of educational reasons for taking part in CBHE on the part of long-established and reputable HEIs. Furthermore, CBHE involves importers as well as exporters and hence it is important to consider the motives of the former as well as the latter. Although importers and exporters may not always be equal partners, exporters in pursuit of high quality and lengthy relationships often view their relationships as partnerships.

5. Mapping of Regulatory Frameworks in the 27 EU Member States

5.1. EU Regulations

With cross-border provision of higher education being a relatively recent phenomenon and one on the rise, the legal framework concerning these services is evolving. Competences at both EU and Member State level have to be considered.

At EU level, the relevant regulation of cross-border delivery of higher education in the form of validation or franchise agreements or through the opening of branches is governed first and foremost by the Treaty on the Functioning of the European Union. With importance to the provision of private education as an economic service, the Treaty guarantees the freedom of establishment (Art. 49) and provision of services in any Member State of the EU (Art. 56). Article 54 and 62 extend these freedoms enjoyed by nationals of Member States to companies or firms formed in accordance with the law of a Member State and having their registered office, central administration or principal place of business within the EU. In addition, the Treaty defines higher education, both public and private, as an area where the EU has supporting competence: it encourages the mutual recognition of qualifications (Art. 53), the development and maintenance of quality education, and academic mobility (Art. 165). Moreover, students benefit from the right to not be discriminated when exercising their right to free movement, in the context of the EU citizenship (Art. 18).

The regulation of higher education services in the private education sector has to comply with the Service Directive¹⁵, which needed to be fully implemented by the Member States by 28 December 2009. In January 2011, the results of the mutual evaluation process concluded that substantial disparities between the regulatory approaches in the different Member States seem to remain with regard to the establishment of branches of higher education institutions.¹⁶ While the Services Directive was meant to reduce or abolish a number of legal requirements, major restrictions, such as establishment requirements, still exclude the possibility to provide services cross-border in a number of Member States, including for educational franchising across borders.

The recognition of qualifications with a view to exercise a regulated profession is governed by Directive 2005/36/EC on the recognition of professional qualifications. The Directive provides for a system of automatic recognition based on minimum harmonisation of training conditions for the following professions: doctor, dentist, nurse responsible for general care, midwife, pharmacist, veterinary surgeon, and architect. The Directive provides for a system of automatic recognition based on professional experience for a number of professions in the area of craft industry and commerce. The other professions are subject to the so-called “general system”. Under the general system if substantial differences are identified between training courses and that these differences cannot be

¹⁵ Directive 2006/123/EC of 12 December 2006 on services in the internal market.

¹⁶ Commission Staff Working Paper: On the process of mutual evaluation of the Services Directive Accompanying document to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Towards a better functioning Single Market for services – building on the results of the mutual evaluation process of the Services Directive {COM(2011)20 final}.

compensated by professional experience the host Member State can impose to the holder of the qualification either a test or a training period at the choice of the holder.

This Directive is in the process of being modernised and simplified. This is one of the priority actions in the Single Market Act as a means to facilitate mobility. However there will be no amendment to the provisions relating to the recognition of franchised diplomas (see infra point 5.2.1– recognition of degrees). The modernised Professional Qualifications Directive¹⁷ is expected to be adopted end 2013/ early 2014.

The mutual recognition of academic diploma and degrees for the purpose of further studies is the responsibility of the Member States. Most European countries however ratified the Convention on the Recognition of Qualifications concerning Higher Education in the European Region¹⁸, commonly referred to as the Lisbon Convention. They are thus obliged, for example, to recognise qualifications, unless there is proof of substantial differences between its own qualifications and the qualifications for which recognition is sought.

Quality concerns and doubts about appropriate consumer protection linked to the transparency and trustworthiness of education services seem to be main barriers for mutual recognition of academic diplomas for the purpose of further studies. This also impacts the regulation of cross border provision of education services, as became apparent during the mutual evaluation of the Services Directive:

Some Member States (e.g. Latvia, Portugal) seem to require all higher education institutions (regardless of the type of diploma awarded) to be authorised or accredited. The justification given is that all types of higher education should be regulated to ensure that citizens obtain high quality educational services adequately preparing them for the labour market.

Portugal reported a ban on educational franchising, claiming that it would put the fundamental rights to high quality education at risk, even with restrictions linked to the programmes. Regulations on educational franchising also exist in Greece and Cyprus (the latter has recently lifted a ban on cooperation with foreign institutions in the framework of educational franchising).

The European inter-governmental Bologna Process has brought on the way extensive reforms of the higher education landscape. For example, all higher education institutions in the EU are reforming their degree structures and are introducing Bachelor, Master, and Doctorate as new diplomas. The existing emphasis on quality assurance in the Bologna Process, with the European Standards and Guidelines for Quality Assurance as a tangible outcome, has led to some degree of convergence. Still, at the time being and due to the distribution of competences between the EU and the Member States, there is no common legal framework in place for the regulation and quality assurance of higher education in the EU, which accounts for national differences in regulation and accreditation/quality assurance practices. As for programmes delivered across borders, the case law created by the Court of Justice of the European Union in the field of regulated professions has

¹⁷ Directive 2005/36/EC on the recognition of professional qualifications.

¹⁸ http://www.coe.int/t/dg4/highereducation/recognition/lrc_EN.asp.

referred the oversight of those programmes to the sole responsibility of the Members States where the institution is established.

5.2. Cross-Country Analysis

In this section, we present the findings from the survey concerning the regulatory mechanisms currently in use in the EU. We begin by presenting factual information regarding the types of mechanisms used, before showing how different groups of countries combine them in different ways to exercise varying degrees of control on CBHE. We then present respondents' perceptions in relation to CBHE.

It should be noted that this is a complex and technical area and survey responses have often been hard to interpret, with many clarifications being sought.

5.2.1. Types of mechanism used to control the receipt of CBHE

Member States exercise control over CBHE by controlling an institution's right to operate within their territory as a receiving country. In addition, the process of degree recognition also has a bearing on CBHE, although in a less direct way. The survey examined both areas, as well as the geographical scope of regulatory mechanisms, specifically whether countries differentiate between EU-based and non-EU-based institutions. Differences in this regard would indicate the extent to which the EU might be developing as an area with different sets of regulatory arrangements to the rest of the world.

Controlling the right to operate

As countries in receipt of CBHE, Member States use a variety of mechanisms to exercise varying degrees of control over institutions seeking to establish branch campuses or validation/franchising agreements. This ranges from registration which can simply be a means by which national authorities can keep track of incoming provision or institutions to completely banning certain forms of provision, which is very rare in Europe. In between these two extremes, countries use a number of mechanisms. Some countries require institutions to be accredited in their exporting country, which is a means of trying to ensure some form of minimum quality threshold. Other countries require institutions to be authorised or to receive the consent of national authorities. Some countries require foreign providers to receive institutional accreditation, i.e. in effect to become part of the national higher education system of the receiving country.

Member States use these mechanisms in different combinations to produce varying degrees of influence on institutions' ability to operate in CBHE. It should be noted that foreign providers are often treated in law as private institutions; in other words, legislation relating to private institutions is applied to foreign providers. The implications of this are further discussed in the next paragraph.

Recognition of degrees

In order for degrees obtained within a CBHE framework to be officially recognised within a national context for the purpose of exercising a profession, degrees can be recognised in accordance with Directive 2005/36/EC provided that: *the training course at the establishment which gives the training has been formally certified by the educational establishment based in the Member State of origin of the award; the evidence of formal qualification issued is the same as that which would have been awarded if the course had been followed entirely in the Member State of origin of the award; and the evidence of formal qualification confers the same professional rights in the territory of the Member State of origin of the award*¹⁹. For the purpose of further studies, degrees can be recognised through normal transparency procedures, and/or higher education institutions can themselves choose to accept them. Such procedures vary from country to country in their complexity and in the amount of administrative work for individual students.

Alongside controlling the right of foreign institutions to operate, the degree recognition process of receiving countries therefore has a bearing on CBHE. Its influence is less direct and clearly is not always relevant since in many cases the point of CBHE from the student perspective is primarily to obtain a 'foreign' degree without paying heed to its de facto legal value. Nonetheless, the difference between a 'foreign' degree and one that is officially recognised within the national system of the receiving country – be it for access to a profession or further studies – has an impact on the attractiveness of a particular country for potential CBHE providers. Courses will be unattractive if students cannot gain a qualification that is recognised in their receiving country, and thus has no legal 'value' for the purpose of continuing education or possibly government employment. Lack of degree recognition in the country where courses are taken may also cause problems for holders of such qualifications in third countries as doubt may be cast on their validity. In some countries, furthermore, working for a locally recognised degree is essential for full 'student' status which can be important for eligibility to receive financial aid or in terms of obtaining visas for non-EU citizens²⁰. This can be an incentive for foreign providers to not only offer the degrees of their exporting countries, but also to go through a national accreditation procedure in order to obtain the right to award national degrees of the receiving country.

There are therefore three ways for countries to restrict the operation of foreign CBHE providers in their jurisdiction: excluding degrees provided by foreign providers from providing access to the national education system; excluding holders of such degrees from access to state-regulated professions or government employment (which might be in contradiction of Directive 2005/36/EC); and barring foreign providers from seeking national accreditation in the receiving country. In some countries, it is not possible for foreign institutions to secure the right to award national degrees at all, thus limiting this route for foreign providers to circumvent the difficulties for their graduates caused by limited recognition of foreign degrees awarded within a CBHE framework. Indeed, restricting the right to award national degrees is, as we see below, an important tool for exercising some influence over CBHE in countries which otherwise have few if any regulations.

¹⁹ Article 50.3.

²⁰ A prominent case being the Netherlands, where only students studying at a Dutch-recognised institution are eligible for receiving benefits

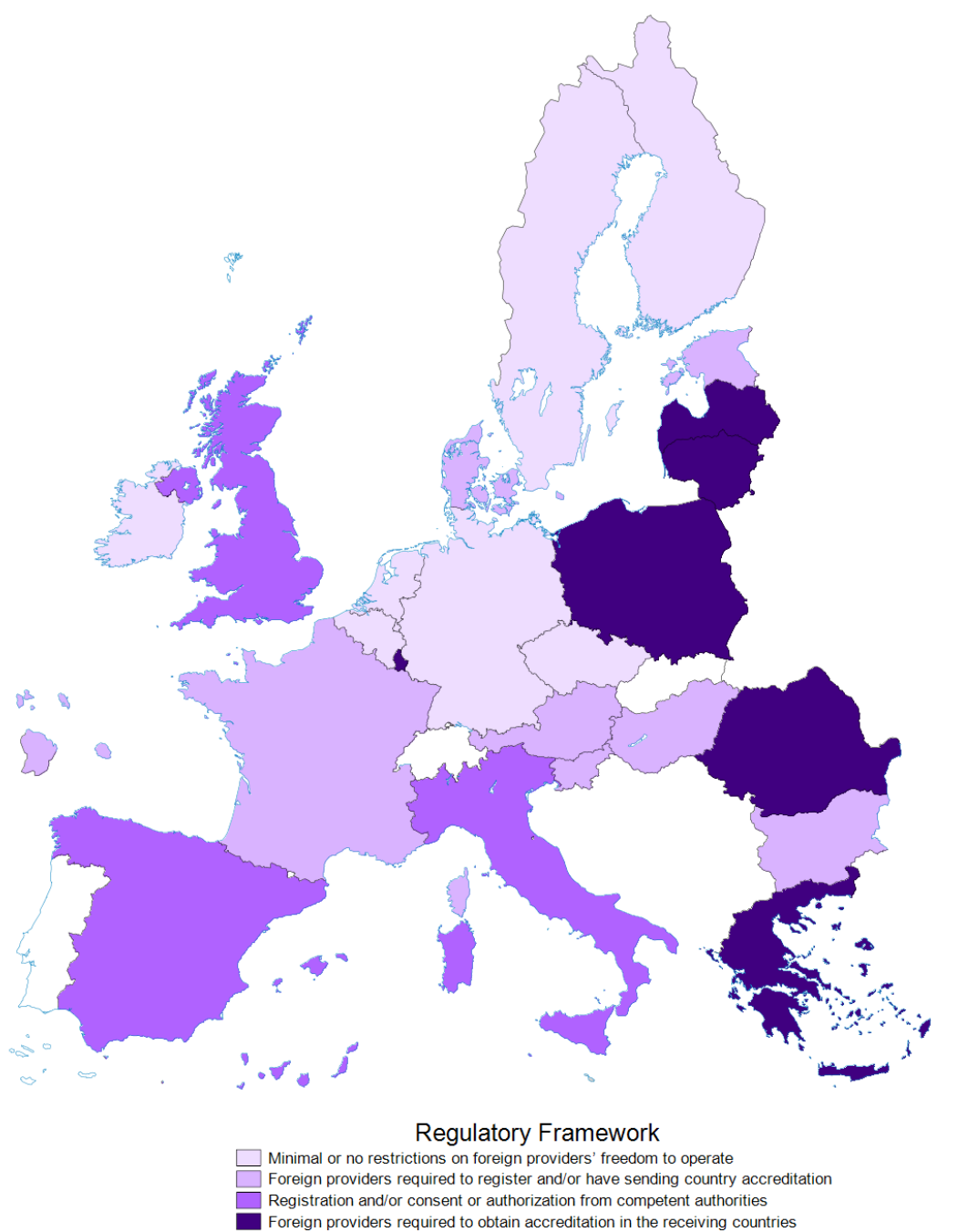
Variations in the degree of regulation across Europe

The mechanisms described above are combined in different ways in different European countries, and it is evident that some Member States exercise closer control over CBHE than others. Indeed, Member States fall across a spectrum in terms of the degree of regulation, ranging from countries where it is possible for a foreign provider to operate without regulation to countries where some forms of CBHE are banned and where foreign providers must obtain the accreditation of the receiving country. It is possible to identify four groups of countries across the spectrum.²¹ Figure 32 shows which countries fall into which categories²²:

²¹ Inspiration for this categorization was drawn from the typology of Verbik and Jokivirta, 2005. In: Martin/ Stella, Module 5: Regulating and Assuring the quality of cross-border providers of higher education, 2011, p. 17.

²² Note that owing to a lack of information obtained it has not been possible to classify Malta, Portugal or Slovakia.

Figure 32: Regulatory classification of EU Member States



It should be noted that this typology, like any other, is necessarily a simplification. It can be difficult to categorise some countries, and the boundaries between the categories are “grey” rather than “black-and-white”. In particular, whilst it is comparatively easy to identify countries at either end of the spectrum, it has been more difficult to categorise some countries in the middle two categories.

Minimal or no restrictions on foreign providers’ freedom to operate (BE, CZ, [DE], FI, IE, NL, SE,)

In these countries, foreign providers are free to operate. In Ireland, the regulatory framework is voluntary and one aspect involves alignment with the national qualification framework which imparts recognition of degrees (reforms are currently underway). As Germany has a federal system, generalisation is difficult. It is, however, important to note that the European Court of Justice has rejected the regulations of several *länder* (federal states) on the basis that they constrain the exchange of services and freedom of establishment. This is the reason why many *länder* no longer have regulations applying to received CBHE activity.

In practice, these countries have open borders with respect to foreign providers. However, some of the countries in this group do not have any mechanism by which foreign providers can award national degrees, thereby potentially reducing their attractiveness to exporting HEIs. This is the case in Finland and Belgium-Wallonia. In the Netherlands students may not carry their student grant to institutions which do not possess national accreditation, which is likely to act as an important deterrent to studying in some form of CBHE-arrangement.

Foreign providers required to register and/or have sending country accreditation (AT, CY, BG, DK, EE, FR, HU, SI)

In this group of countries, foreign providers are either required to register in the receiving country and/or to prove that they have official accreditation from their exporting country. Such requirements impose a minimum burden on providers. Used without any other mechanism, registration is simply a means by which national authorities can keep track of incoming provision/institutions. The information that institutions are required to provide can be quite limited, as in France, where private institutions are required to register by indicating the location of activities and the programme content.

Registration can involve abiding by certain criteria. The most common tool to do this, and by doing so to try to ensure some form of minimum quality threshold, is to require institutions to be accredited in their exporting country. Most frequently, this is a straightforward requirement without any other conditions. Member States who rely upon this mechanism are effectively relying upon the efficiency and effectiveness of other countries' accreditation systems.

Registration and/or consent or authorization from competent authorities (ES, IT, UK)

In these countries, registration and accreditation of the exporting country may be required, and in addition there is a more demanding requirement for consent or authorisation to be obtained from competent national/regional authorities. Such consent/authorisation requires the submission of documentation and the fulfilment of certain criteria. In Italy, foreign institutions must submit a range of information to three ministries, including documents from the exporting institution which corporately approve activities and specify the absence of profit-making activities, and which testify that the disciplines taught in Italy are part of programmes taught at the exporting institution. They also must supply an annual list of all students enrolled in Italy, the programs on offer and a copy of the financial statement.

Excursus 4: Regulation in the UK: using a cluster of measures

Regulation in the UK: using a cluster of measures

In the UK CBHE is controlled through a group of measures encompassing educational, commercial and border control legislation, rather than one regulatory act. Universities must adhere to the requirements of the Companies Act. The Education Reform Act 1988 makes it an offence to offer what could be taken to be a UK degree unless the body offering it is recognised by the UK authorities.

Until recently most CBHE received in the UK has been for short term US study abroad students often studying at their own university's premises in the UK. Any foreign provider wishing to recruit non-EEA students has to apply for 'highly trusted sponsor' status from the Border Agency. Starting in 2011-12, this can only be obtained if these providers have a body which provides 'oversight' of their education provision, which in the case of higher education providers is from the Quality Assurance Agency for Higher Education (QAA).

From the end of 2012 all highly trusted sponsors will need to have had a satisfactory inspection or review by their educational oversight body. The QAA has placed a number of requirements on providers including: to be registered at Companies House or a registered charity; be offering programmes accredited by a UK awarding body (e.g. a UK HE provider) if they wish to offer UK degrees; and to maintain procedures and make sufficient resources available to meet the expectations set out in the QAA's UK Quality Code for Higher Education.

Foreign providers required to obtain accreditation in the receiving countries (EL, LV, LT, LU, PL, RO)

These countries have the strictest controls on foreign providers in the EU. Foreign providers are required not only to have the accreditation of their exporting country (which may need to involve a quality assurance agency listed in EQAR as in Poland and Romania) but also to obtain the accreditation of the receiving country. In effect, therefore, these countries require foreign providers to become part of the national higher education system in order to operate. Some countries, such as Latvia and Lithuania, also prohibit franchising or validation arrangements, and only permit branch campuses to be set up. In Poland, branch campuses may only be set up on the consent of the

Minister for higher education after he/she has received an opinion from both the Minister for foreign affairs and the Polish Accreditation Committee.

Treatment of EU-based and non-EU-based institutions

As noted, respondents were also asked in the survey to indicate whether EU-based and non-EU-based institutions were treated differently in their regulations. Outside of Bulgaria, Cyprus, and Greece, which ban programmes from outside the EU, it is notable that very few countries differentiate between CBHE from EU-based and non-EU-based institutions. Where such differences do exist, they tend to be quite minor. In Lithuania, whilst all foreign institutions need to obtain national accreditation, the process for EU-based institutions is lighter in so far as it does not involve analysis of the curriculum (provided the curriculum has exporting country accreditation). In Estonia providers from outside the EU can only operate provided additional governmental level agreements are in place.

5.2.2. Regulation of Exporting CBHE

The preceding section examined the regulations used by Member States to control the inflow of CBHE into their countries. The survey also examined whether – and to what extent – Member States impose regulations on institutions based in their own countries that wish to export activities across borders.

In contrast to the regulation of received CBHE activity, countries rarely impose heavy restrictions on the exporting activities of their higher education institutions. The vast majority of countries either impose no regulation at all on their institutions or rather minimal constraints. Countries with no regulation in place include: Finland, Estonia, Slovenia, Cyprus, Luxembourg, and Lithuania. However, CBHE export in these countries is nevertheless low or non-existent. In Sweden, there is no regulation of exporting activity, but in practice restrictions on how Swedish public funding can be used abroad limits the freedom of action.

Examples where some form of minimum requirement is in place include:

- Romania, where institutions are required to follow Romanian legislation related to quality assurance;
- France, where existing degrees can be delivered abroad provided they have been authorised by the ministry and jointly with foreign partners;
- Poland, where institutions may operate abroad but with the consent of the Minister for higher education once she/he has received an opinion from both the Minister for foreign affairs and Polish Accreditation Committee;
- Denmark, where providers must ensure that provision is not in contradiction of legislation in the receiving country and that cooperation agreements between universities exist; and
- Germany, where exported activities are covered to some degree by accreditation procedures.

In the UK, expectations regarding the quality of HE exports are contained within the QAA's Quality Code, as described in the box below.

Excursus 5: Quality assuring CBHE exports: the example of the UK

Quality assuring CBHE exports: the example of the UK

UK universities are autonomous and do not need to seek UK approval to operate outside the UK. Many UK institutions offer higher education programmes through partnership links with organisations abroad, through distance learning (including online programmes) or deliver programmes on overseas campuses. UK national expectations about the management of quality and standards through partnership arrangements (whether in the UK or overseas) are set out in QAA's UK Quality Code for Higher Education, chapter b1023. Higher education institutions are responsible for the academic standards of their awards, whether delivered inside or outside of the UK. The QAA reviews the partnership arrangements that UK higher education institutions have made with organisations in other countries to deliver UK programmes. QAA also reviews provision delivered on the overseas campuses of UK institutions and through distance learning.

Review of Overseas Provision (TNE Review) is carried out according to the same principles and processes as QAA's review methods for higher education institutions. It is an evidence-based peer review process based on a survey of provision by UK higher education institutions, desk based analysis of information sets from the UK HEIs, in-country visits to partners and campuses to meet staff and students, and in a few exceptional cases visits to the UK institution if for example the provision is distance learning or if there are some specific matters that can only be followed up by a visit. As with all QAA review processes the reports of TNE review visits, case study and country overview reports are published and are available on QAA's website.

QAA conducts TNE review on a country by country basis, rather than at the same time as a university or college's own review. The method for overseas review is contextualised according to the country in which provision is located, and the type of provision being reviewed.

As well as reviewing the partnership arrangements of institutions, QAA also gathers information about the activities of UK institutions in a particular country to produce an overview report on UK provision including information beyond the sample of provision reviewed or providing case studies. It also produces reports about individual institutions' arrangements. One interviewee noted that their institution takes these reports 'very seriously' on account of their need to ensure they maintain a good reputation.

A rare example of where the export of activities is quite strictly controlled is in Latvia. Latvian institutions may set up branch campuses abroad, but there is no provision in the law for validation/franchising agreements. There are strict conditions on setting up branch campuses, including minimum capacity requirements.

It is also possible for different regulations to apply to different types of institutions, although evidence of this is patchy. In Austria, private universities and universities of applied science have to be state accredited to export activities. In addition, all of their CBHE activities need to be accredited

²³ <http://www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/default.aspx>

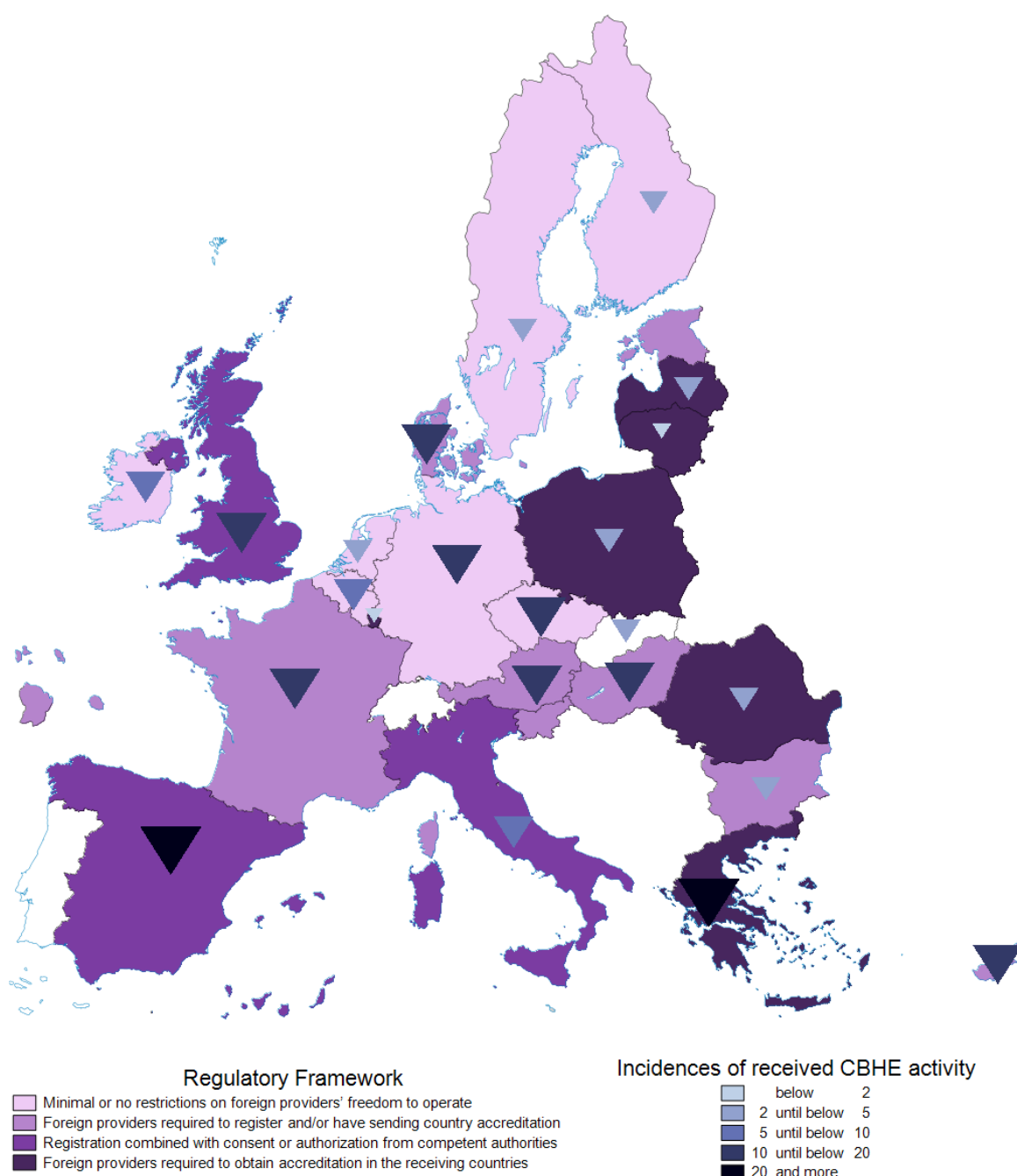
separately, including resource-intensive on-site visits. An institutional accreditation in Austria is not sufficient.

The general picture is one of little formal restriction on institutions offering CBHE in other countries. Thus, the major restraint is the potential damage to an institution's reputation if it receives an adverse report, which might affect its standing within its home country. In terms of importance of factors restraining institutions to engage in CBHE ventures, 'risk' probably ranks higher than 'regulation'. One notable exception to this pattern is the case of Austria where the regulations for the export of CBHE were put in place specifically to protect the reputation and quality of the Austrian higher education system.

5.2.3. Relationship of regulation to patterns of provision

An important question is the extent to which regulation is correlated with levels of CBHE. As discussed above, CBHE is affected by a variety of factors, so a straightforward relationship with regulation seems unlikely. Furthermore, the number of instances of CBHE is too small to enable this relationship to be explored with confidence. It is notable, however, that countries with the highest levels of received CBHE are distributed across the three categories in the typology from "little" to "considerable" regulation, suggesting that there is no clear relationship between degree of regulation and the extent of CBHE. At the same time, countries with no regulation tend to be countries receiving lower levels of CBHE. This may suggest that stronger regulation might sometimes be a reaction to (the perception of) CBHE, although we have no way of knowing what the level of demand is for CBHE in individual countries.

Figure 33: Relationship of regulation to patterns of provision



5.2.4. Perceptions of regulation

Along with the factual information on regulatory mechanisms discussed above, the survey also asked for respondents' perspectives and opinions on a range of issues, and the in-depth interviews gathered perspectives on the strengths and weaknesses of different regulatory frameworks.

Respondents in the survey were asked to consider the role of European/international guidelines such as the Code of Good Practice on Transnational Education (under the Lisbon Recognition Convention) and/or the UNESCO/OECD Guidelines on Quality Provision in Cross-border Higher Education (part of

Bologna Leuven Communiqué) in their countries. In general, knowledge of these guidelines was very patchy, in one or two cases respondents not having any knowledge of them at all. Within individual countries respondents often had slightly different opinions on their influence. Interpreting responses is therefore quite difficult, but in perhaps twelve countries out of 20 for which data is adequate we can reasonably conclude that these guidelines have inspired regulations, processes or good practice.

Regarding the effects of regulation, most survey respondents stated that there were too few instances of foreign provision to comment, or it was too early to judge the effects of particular regulatory frameworks. Only one comment was received which placed regulation in its wider context, and noted that it is actually difficult to establish the effects of regulation on the extent of CBHE since CBHE is affected by a range of factors which make countries more or less attractive to higher education institutions. Another respondent commented that whilst a high threshold of recognition/approval for programs made some countries rather unattractive to providers, in terms of the quality provision it was an effective mechanism.

Survey respondents were also asked to comment on whether they considered the current degree of regulation in their countries to be adequate. Findings here need to be treated cautiously given the small sample size in individual countries. There were mixed perceptions on the adequacy of regulation in seven countries. In eight countries the need for more regulation was expressed, whilst in seven countries respondents said that regulation was adequate with a further three saying it was “mostly” adequate. Interestingly, countries where more regulation appeared to be desired fell across the range of categories in the typology, and therefore included some countries where regulation is already strong. A few respondents commented on the need to guard against overregulation.

The in-depth interviews shed further light on these topics in a number of ways. First, countries clearly vary in the extent to which they regard CBHE as a challenge at the level of national policy and the evolving national approach reflects the pattern of imports and exports. In France, for example, the small scale of incoming CBHE, which is partly attributed to the small size of the private sector in HE, has thus far not been regulated, being left to the self-regulation of the market. Further, the focus of HEIs has been on exporting provision to countries outside the EU with many French HEIs having internal regulations governing their exports. In this context, the policy focus has not been on the use of regulation to control incoming CBHE so much as to emphasise the need for countries to quality assure their exports. Recent policy includes drawing up bilateral agreements with, for example, China and Morocco in which quality is an important feature.

Many UK HEIs have a global perspective (for example, in 2011 one third of UK HEIs were found to have links to universities in Singapore²⁴, a country which has actively encouraged CBHE in order to realise its ambitions of growing its HE base) and there is very little incoming CBHE for UK students, most being for foreign students in the UK. UK government policy sees HE as an important export and HEIs are encouraged to internationalise their activities. A significant part of the QAA Quality Code is dedicated to collaborative working. The QAA carries out audits of overseas provision in which it assesses provision by UK HEIs in individual countries and, inter alia, identifies areas for improvement.

²⁴ QAA (2011) Audit of overseas provision, Singapore. Overview Report, July 2011

These recommendations are reported by providers to be taken very seriously given the potential damage to reputation involved since the audits are publicly available.

In Austria, a step-by-step approach has been adopted which will, in the first instance, scope out the size and nature of incoming CBHE through mandatory registration. Registration focuses on accreditation in the exporting country but not in detail on the content or quality of programmes offered in Austria. Depending on what the data yields, this might be the first step to developing an empirically-based regulatory framework. In the meantime, there remains a reliance on the processes of exporting countries. In terms of exports, each campus or programme operated abroad by private Austrian universities is separately accredited. Public HEIs, though permitted, do not normally engage in CBHE.

Excursus 6: Regulation in Austria: towards an empirically-based policy approach

Regulation in Austria: towards an empirically-based policy approach

Although cross-border higher education continues to play a relatively marginal role in Austria, the country has in recent years seen an increase in CBHE activity as well as growing numbers of student inquiries about individual foreign providers. As no centrally aggregated information was available about foreign providers operating in Austria, all requests had to be dealt with in an ad hoc manner. Ministry officials would inquire in the exporting country, trying to discern which degrees the institution in question was authorized to award.

In many cases, these inquiries were extremely time-consuming, which ultimately gave rise to a new approach in mid-2012. The regulation of CBHE was included in the new *Act on Quality Assurance in Higher Education in Austria (QS-Rahmengesetz)*: foreign providers operating in Austria are required to have the accreditation of their country of origin and to register with the Austrian Ministry for Science and Research. Foreign providers operating in Austria may issue only those degrees they are authorized to award in their countries of origin. Any provider not registered by the end of 2012 will be operating illegally.

This relatively “light footprint” approach was chosen because policy-makers are interested in gaining an overview of the status quo rather than regulating a phenomenon about which they have no comprehensive knowledge, while honoring the Lisbon Recognition Convention and the principles of freedom of establishment and services in the European Union. The new regulations seek to establish greater transparency about the kinds of programs and providers that exist and the exporting countries that are involved.

An assessment of the conclusions that can be drawn from the data and information collected will probably occur in mid-2013. Whether the current registration-only approach is too low key and whether stricter regulations are necessary will be evaluated in the course of time and as new data is gathered.

In Cyprus, CBHE is a matter of receiving provision rather than exporting it. State regulation of incoming CBHE was lifted following the introduction of the EU Directive. Similar legal proceedings were conducted in Greece and a number of German Länder. Whilst CBHE has been important in the growth of HE in Cyprus, the government is unable to assess the quality of provision; registration is required for incoming provision but this simply enables the government to monitor CBHE. Views differ on the effect of incoming CBHE. Some fear it may inhibit the growth of indigenous provision. Others see incoming CBHE having a wide range of benefits for institutions (see 5.2.2 below) as well as making high quality programmes available which would otherwise be inaccessible.

The second issue concerns whether the focus of regulation or quality control should be at the institutional or programme level. Several interviewees commented that where there is reliance on institutional accreditation there is no guarantee of quality for a particular programme in a particular place at a particular time. Standards of institutional accreditation also vary from country to country so it is not always readily transparent what standards are being applied. Whilst partners in a validation/franchising arrangement may be satisfied with quality arrangements, the standards being applied may not be clear without considerable effort to others. Evidently, this is a particular issue for students who lack a ready means of understanding quality. Furthermore, the in-depth interviews also revealed that much can depend on how rigorous an individual provider is in implementing QA processes, especially with regard to individual programmes. Interviewees pointed out the trade-offs required in any arrangements with the costs involved.

5.3. Observations and Interpretation

Diverse approaches to regulation

Member States cover a broad spectrum in terms of the controls they place on the ability of foreign providers to operate on their territory. Perhaps around one third of Member States have in place quite strict requirements. Even the Member States with no regulation, which number around one quarter, in practice may deter CBHE to some degree either by not allowing the accreditation of foreign provision, or by having in place heavy procedures for accreditation where it is permitted. Although we have not gathered detailed evidence in relation to degree recognition procedures, it is reasonable to ask whether they are quick and efficient and encourage or constrain CBHE in practice.

It is unclear why such variety in regulation procedures exists. The relationship between the level of regulation and the amount of CBHE activity in receiving countries appears to be weak or to suggest that stricter regulatory frameworks tend to be a reaction to perceived concerns over CBHE as much as to the reality. Unfortunately, it is not possible for us to answer the counterfactual question as to whether levels of CBHE would be higher if strict regulation did not exist. Whilst it is evident that countries that have strict regulation do not have high levels of CBHE (with the exception of Greece), we do not know what the level of demand is from exporting institutions to operate in those countries.

Of the four countries in which in-depth interviews were conducted, Austria is probably most representative of the majority of EU Member States insofar as it has no major HE exports, but does experience some incoming CBHE. At the same time, there is an awareness that evidence is required

about CBHE before appropriate regulatory mechanisms can be put in place. Such an approach may have lessons for other countries.

Heterogeneous knowledge of regulation among stakeholder organisations

A striking feature of the results of the survey is the lack of knowledge regarding the effects of regulation. This occurs alongside a tendency for many respondents to desire more regulation of CBHE, even in countries with already high levels of regulation. This raises questions regarding the extent to which regulatory frameworks are based on existing experience regarding CBHE such as poor quality provision or fraud or are, instead, a reaction to concerns which lead to what we might term “just in case” strategies.

Equal treatment for EU and non-EU providers

Another important aspect of the results, in particular with regard to the drive to build up the European Higher Education Area, is that most receiving Member States do not differentiate in their regulatory frameworks between EU-based and non-EU-based providers, with the exception of Bulgaria, Greece and Cyprus.

High level of reliance on exporting countries for QA, but scarce regulation of own exported CBHE

Whilst two thirds of Member States have some form of regulation in respect of receiving CBHE, most of them rely substantially upon the accreditation processes of exporting countries. This is a significant level of trust. A certain “regulation gap” or “accountability gap” may be said to exist where no regulation or minimum registration requirements on the receiving side coincide with no regulation of CBHE export in the exporting country. The exception to this is the UK and its peer-review based approach led by the QAA which stems from UK universities’ independent status and Austria, which request additional accreditation of each branch or programme delivered through CBHE arrangements.

Even where countries regulate the receipt of CBHE, there can be a lack of regulation of exports. This is notable in itself, but especially interesting in light of the case law of the European Court of Justice, which has ruled that the exporting Member States are responsible for the organisation and evaluation of the courses and degrees granted by their higher education institutions, including those delivered in another Member State. With current low levels of CBHE there is clearly an opportunity to take steps on the exporting as well as the receiving sides to deal with issues of quality etc. before levels of CBHE increase. Efforts by both receiving as well as exporting local governments or EU-wide coordinating bodies or networks (such as possibly EQAR or the ENIC-NARIC bodies) to monitor the export and establishment of CBHE activities could have positive impacts on quality.

6. Risks, Benefits and Quality

As became apparent in the first Experts Delphi, those engaging with or interested in CBHE are primarily concerned about issues of quality and quality assurance. Quality is a key word mentioned in almost every study or newspaper article discussing CBHE activities. Nevertheless, overall awareness of CBHE carried out within the EU (and beyond) is low, and regulatory approaches range from no regulation whatsoever to heavy restrictions and scrutiny of such activity. In order to better understand the range of approaches to dealing with foreign providers operating branch campuses or engaging in franchising and validation agreements, the research team decided to consider questions of possible risks and benefits of CBHE. The following sections summarise the findings of studies as well as those obtained from the main survey and the in-depth interviews.

6.1. Context

Risks relating to CBHE activity involve issues related to quality and, to a smaller extent, to access. For example, it has been found that exporting institutions tend to use their programmes as the only reference points for quality and ignore local educational practices and philosophies.

Cross-border provision of higher education may allow students to acquire an academic qualification that eludes quality assurance through regulatory mechanisms applying to domestic providers of higher education.²⁵ There may be little or no internal quality assurance implemented by the exporting institution, which might regard its cross-border provision primarily as a way to generate profit. In those instances, consumer protection becomes a major issue – especially if there is a lack of information about and transparency of the program. Whilst research suggests that student recruitment to branch campuses is most strongly influenced by reputation, programme quality and rankings, and therefore that competitive advantage for institutions may be linked as much to quality as price,²⁶ the student experience of quality in branch campuses as compared to the exporting institution can be different.

Extensive cross-border provision of higher education may also have adverse effects on the domestic higher education system if low-quality programs enter into “unfair competition” with recognised and accredited domestic providers.²⁷ In a previous study, survey respondents even voiced the concern that cross-border higher education may undermine or compromise national autonomy.²⁸ In the worst case, rogue providers or “diploma mills” award degrees without requiring the completion of much or any coursework at all.²⁹ Issues of equal access may also be touched. Tuition fees³⁰ for cross-border

²⁵ (Martin/ Stella, Module 5: Regulating and Assuring the quality of cross-border providers of higher education, 2011, p. 12; Adam, Stephen, 2001, p. 41).

²⁶ (Wilkins/ Huisman: Student Recruitment at International Branch Campuses: Can They Compete in the Global Market? *Journal of Studies in International Education*, July 2011; vol. 15, 3: pp. 299-316).

²⁷ (Adam, Stephen, 2003, p. 56; Adam, Stephen, 2001, p. 41).

²⁸ (Adam, Stephen, 2003, p. 56).

²⁹ (Martin/ Stella, 2011, p. 12; Adam, Stephen, 2001, p. 41).

³⁰ As described below, cross-border higher education in the vast majority of cases falls outside the realm of nationally registered higher education, which means that it can commonly be offered only as a private service. National regulations as to what type of provider of higher education is eligible for public funding may vary considerably (cf. Martin, Cross-border

delivery of higher education may disadvantage students from lower socio-economic backgrounds, especially in countries where public higher education is free or relatively inexpensive. Apart from concerns about lack of transparency and insufficient quality, unpredictable campus or program closures are a key risk from the student perspective.³¹ Finally, foreign language programmes and international degrees, fostering a connection or attachment to the exporting institution and country, have the potential to encourage brain drain. This is a phenomenon far from unique to developing countries and will increasingly become a challenge for advanced industrialised economies facing skill shortages in particular sectors, although one economic simulation has suggested that branch campus quality may affect the extent of brain drain, with low quality campuses having no influence and higher quality branch campuses actually reducing brain drain.³²

Despite these risks, however, observers and stakeholders also acknowledge several ways in which receiving countries and their societies may benefit from the cross-border provision of higher education. First, and most obviously, such provision may enhance the supply of higher education and diversify the academic programme offerings available to students in the receiving country. Cross-border providers may even fill gaps in the domestic supply of higher education if they introduce unique and innovative niche study programmes, which in turn may stimulate a diversification of domestic higher education offerings.³³ In the case of validation and franchise agreements, domestic institutions may also benefit from direct exchange and cooperation with prestigious international institutions, and they might increase the quality of their own degree programmes by comparing the curricula to those of the franchised programmes.³⁴ Second, where domestic public or private provision of higher education is limited or highly restricted in certain subject areas or where there is considerable excess demand, branch campuses, franchised or validated programmes may expand access.³⁵ A third advantage for students and employers lies in the appeal of the international character of cross-border education. The preferred language of instruction for study programmes offered through branch campuses, validation or franchise agreements is English. Proficiency in the global lingua franca, in conjunction with an international degree, provides students with a much valued competitive advantage.³⁶ Even though students may pay higher fees at a branch campus than at a domestic university the benefits may outweigh the additional costs.³⁷ In the European context, the potential of enhancing the competitiveness of European education has been highlighted.³⁸

higher education: regulation, quality assurance and impact, 2007, p. 52), but based on the literature reviewed it must be assumed that tuition fees are charged for cross-border programmes in higher education in most instances.

³¹ (Becker, 2009, p. 5).

³² (Lien/ Wang, 2010, op cit).

³³ (Adam, Stephen, 2003, p. 56; Adam, Stephen, 2001, p. 40).

³⁴ (Adam, Stephen, 2001, p. 40).

³⁵ (Knight, Higher Education Crossing Borders: A Guide to the Implications of the General Agreement on Trade in Services (GATS) for Cross-border Education, 2006, pp. 52-53).

³⁶ (Martin/Stella, Module 5: Regulating and Assuring the quality of cross-border providers of higher education, 2011, p. 12).

³⁷ (Lien/ Wang: The effects of a branch campus, Education Economics, DOI:10.1080/09645292.2010.488488, 2010).

³⁸ (Adam, Stephen, 2003, p. 56; Adam, Stephen, 2001, p. 40).

6.2. Perception of Risks and Benefits

The survey included questions on the perceived risks and benefits of CBHE, based on the literature research as presented above. This section presents the assessment of risks and benefits of CBHE as viewed by different types of stakeholders. An analysis at the country level was not possible due to limited data.

6.2.1. Risks

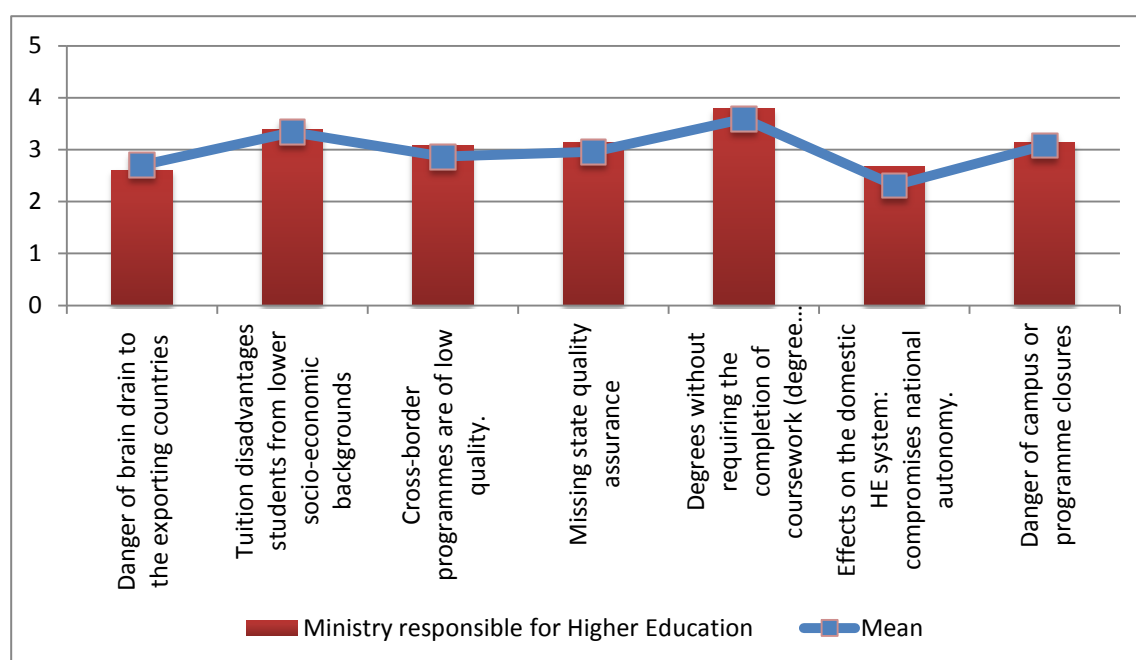
Participants of the main survey were asked to indicate their agreement with the following statements in their country (on a scale from 1: strongly disagree to 5 – strongly agree):

- Danger of brain drain to the exporting countries
- Tuition-based cross-border delivery of higher education disadvantages students from lower socio-economic backgrounds because they are outside student support system
- Cross-border programmes are of low quality.
- Cross-border programmes have no internal quality assurance mechanisms in place.
- Danger of allowing students to purchase an academic qualification without the state quality assurance that apply to domestic providers of higher education.
- Rogue providers or “diploma mills” award degrees without requiring the completion of much or any coursework at all.
- Cross-border provision of higher education has adverse effects on the domestic higher education system. Cross-border provision of higher education compromises national autonomy.
- Students are adversely affected by campus or programme closures.

It has to be noted that the number of respondents in each of the following categories varies considerably and is very low for some institutions types: 28 ministries of higher education, 22 quality assurance bodies, 8 HEI umbrella organizations, 8 providers of CBHE, 6 ENIC/NARIC bodies and two others (no separate chart) are represented.

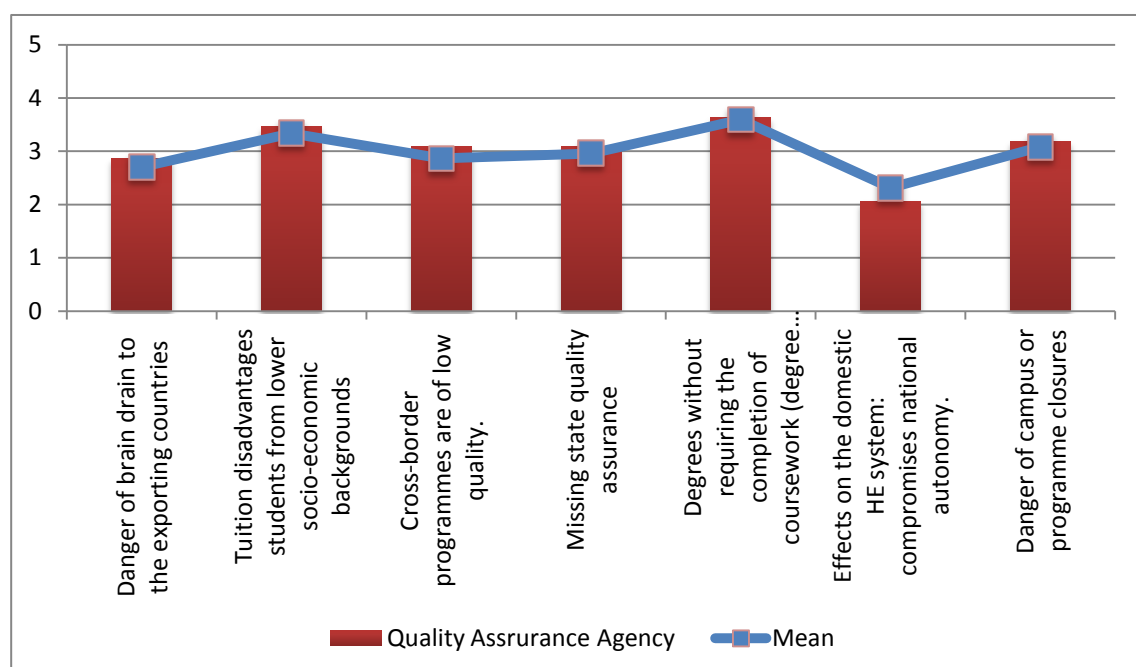
In the following charts, the blue line indicates the average assessment of all participants. Across all participating countries and institutions, none of the potential risks is perceived to be very high. The greatest concern is about degree mills (clearly above the neutral position at about 3.5). Slightly elevated, i.e. assessed as somewhat applicable, are the adverse effects of tuition fees on socially disadvantaged students and the danger of program closures. In the cross-section, there are no concerns about the low quality of CBHE programs or about missing quality assurance; average assessment is neutral. On average, the respondents do not feel that the risks of brain drain and compromised national autonomy apply in their country. Compared to the average respondent, ministries responsible for higher education are somewhat more concerned about degree mills and negative impacts on national autonomy and somewhat less concerned about brain drain.

Figure 34: Assessment of risks by Ministries for Higher Education



The responses of quality assurance agencies correspond very closely to the average respondent on all potential risks, although they are somewhat less concerned about the adverse effects of CBHE on the autonomy of national higher education systems. They also assign the risk of low quality CBHE programs marginally more importance than the average respondent.

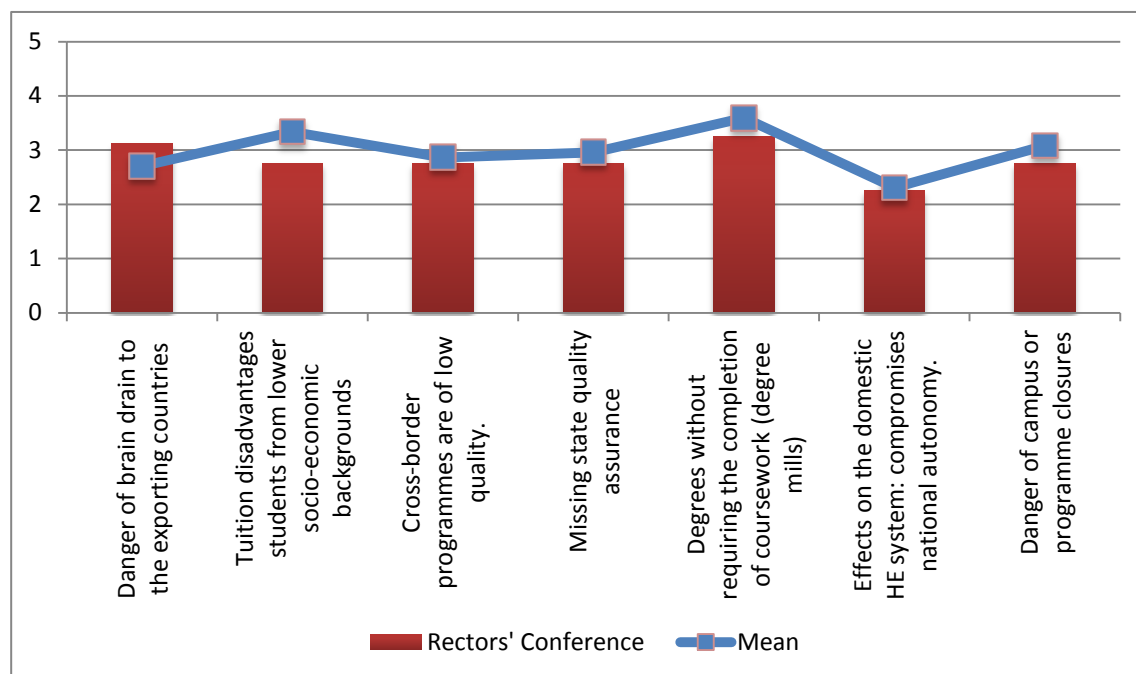
Figure 35: Assessment of risks by Quality Assurance Agencies



The assessment of HEI umbrella organizations deviates more clearly from the overall mean concerning almost all potential risks. Rectors' conferences and other similar organizations consider the risk of brain drain to be more relevant than the average respondent, but they appear to be less

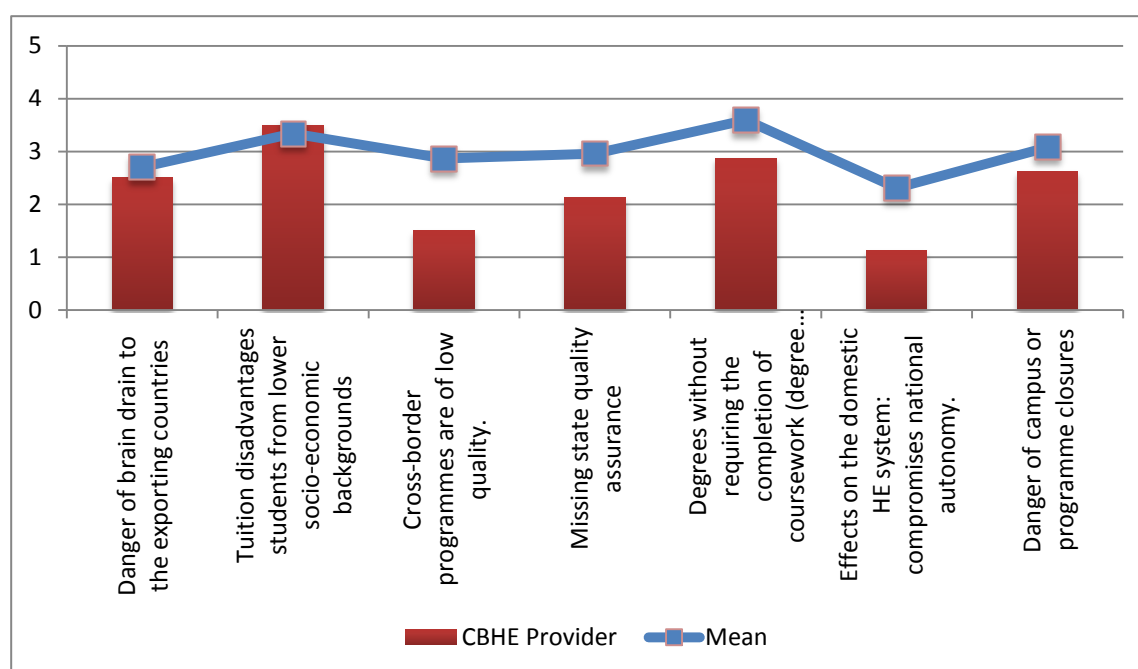
concerned about tuition fees disadvantaging students from lower socio-economic backgrounds, about degree mills and program closures.

Figure 36: Assessment of risks by Rectors' conferences



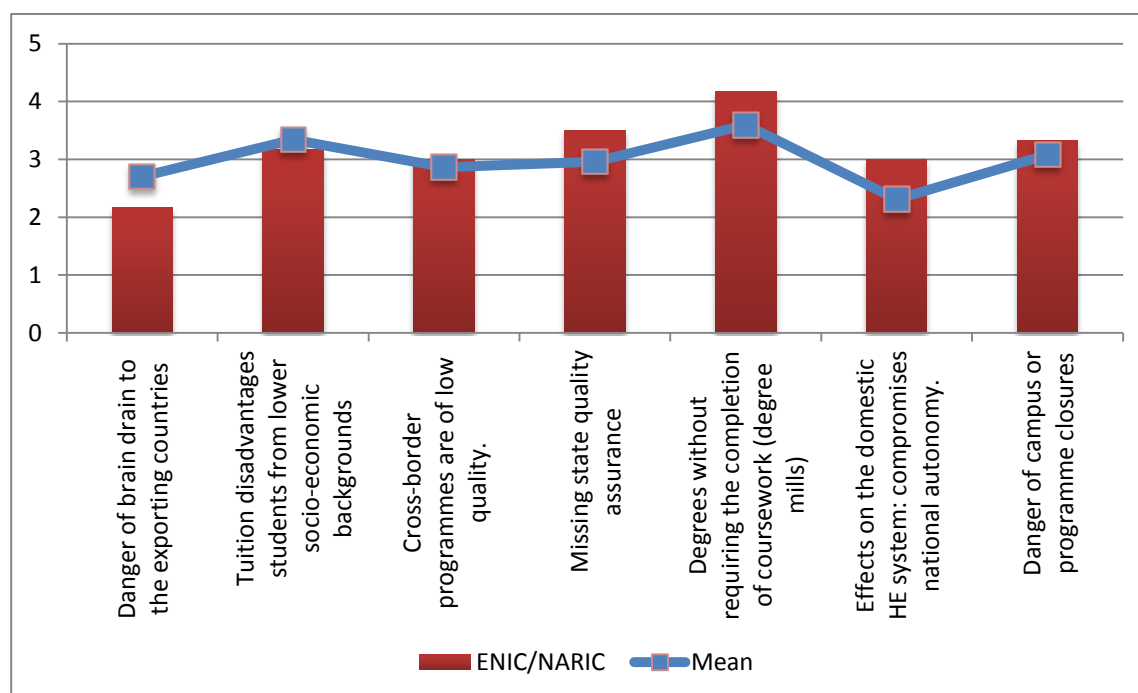
It comes as no surprise that CBHE providers are less inclined to see risks resulting from the provision of cross-border higher education. Although they consider the risk of tuition fees disadvantaging students from low socio-economic background to be more applicable than the average respondent, their assessment of all other risks falls clearly below the mean. In particular, they do not perceive a risk of low quality CBHE programs or of adverse effects on the autonomy of the higher education system in the receiving country.

Figure 37: Assessment of risks by CBHE Provider



ENIC/NARIC bodies exhibit an above average assessment of the risks relating to insufficient quality assurance and degree mills. Of all respondents, they are also most concerned about compromised national autonomy in the area of higher education. By contrast, they are least concerned about brain drain to the exporting country.

Figure 38: Assessment of risks by ENIC/NARIC



Survey respondents remarked that the degree to which these risks apply depends greatly on the context of the exporting and receiving countries and institutions.

The in-depth interviews conducted following the main stakeholder survey reveal concerns about quality issues, issues of recognition, the profit motive and concerns about the autonomy of the domestic higher education system.

Several interview partners emphasized that quality in provision can vary considerably from one provider to the next and depends heavily on the seriousness of purpose and the effort invested in institutional quality assurance mechanisms and procedures. It was suggested that branch campuses – owing to closer collaboration with the exporting institution and an overall greater financial, logistical and administrative investment in their establishment and maintenance – may be better suited to ensure high quality provision than franchising or validation. One interviewee highlighted the danger inherent in validation of low-quality programs being implemented in the name of an HEI that has little or nothing to do with carrying out or even designing the programs. Ultimately, however, quality must be seen as a function of the provider’s perceived responsibility, and the potential of CBHE to circumvent national accreditation procedures was explicitly highlighted. Perceived risks (though without hard evidence to back it up) include the fear that providers who fail to get accreditation for their own courses can look to providers abroad for franchising or validation agreements. In Austria, non-higher education institutions have found ways to award foreign academic degrees for non-academic programs that could not be carried out at Austrian universities.

Ambiguity about the recognition of degrees awarded in the context of CBHE is another concern voiced in the interviews, and one that affects awarding institutions and students in different ways. Providers may award foreign degrees that are not recognized in the receiving country or degrees that are valid but that do not qualify for entry into certain professions in the receiving country. Several instances were also cited where providers did not necessarily reveal everything about the status of their programmes to students or even sought to portray them in the best possible light by intimating some form of recognition that does not exist in reality. These cases raise important questions about transparency and how CBHE providers make information available to potential students and the general public.

[Excursus 7: Case Study Sigmund Freud PrivatUniversität Paris](#)

Valid degrees but no access to the profession: Sigmund Freud PrivatUniversität Paris

The Sigmund Freud Private University Paris offers an academic programme in “Psychotherapy Science”. The founding rector of SFU, Prof. Pritz, president of the European Association for Psychotherapy (EAP) was approached by French colleagues who were interested in opening a Branch in Paris. The Austrian authorities (Akkreditierungsrat) only allowed operations as a Branch Campus. For this reason, and because of the attractive brand name, this model was chosen rather than a franchising solution.

While SFU is entitled to a percentage of the profits of the Paris Branch, a relatively low number of students has not lead to profitability yet. The SFU main campus supports its branch through free-of-charge administrative work, advertising and financing the accreditation-related costs. The benefits of continued support of the operations in Paris are seen in the prestigious address in Paris, the opportunity for joint research projects and easy student mobility within an identical curriculum to an attractive destination country.

Accreditation and Quality Assurance

The acceptance as “Ecole Supérieur” through the Recteur d’Académie de Paris was no problem. French regulation does not have any effects on the quality of the programmes as it does not interfere in any way with the content of the programmes. In general, the current French requirements are seen as positive by SFU.

SFU would welcome it if there were a possibility to be accredited just once on the European level, entailing the right to set up shop anywhere in the EU, but this is still not possible. However, the main difficulty is still access to the psychotherapeutic profession, an area in which inner-European labour mobility is still difficult. The European Register (EQAR) is known, but SFU has not noted any practical consequences of EQAR on its operations.

Status in France

The SFU is registered as an “établissement privé d’enseignement supérieur” with the Rectorat d’Académie de Paris and has the legal form of a Non-profit association (“association à but non-lucratif d’intérêt général”).

The biggest challenge for SFU is in fact not the regulation of the higher education sector but the regulations governing access to the psychotherapy profession in France. In Austria, the SFU cooperates with a number of state-recognized psychotherapeutic institutes. In France, the situation is more difficult, as only a few schools of psychotherapy are officially recognized and the SFU Branch in Paris is not recognized by French law as a training institution for psychotherapy. Therefore, SFU graduates will have to apply for acceptance as a psychotherapist after graduation. Since the institution is young the first Master-graduates will be graduated in summer 2013. Their success in the registration process will be of importance for the further development of SFU-Paris.

In addition, initially, students have reported difficulties to find internships. However, this situation is changing due to more cooperations developing and the establishment of an ambulatory psychotherapeutic clinic by the SFU Paris itself, where students can find internship opportunities. Through their student internships, the SFU also hopes to further improve their visibility within the French psychotherapeutic community.

A difficulty in this area is that, in the absence of hard evidence, views can become polarised. Thus, there are suspicions that the profit motive is too dominant in CBHE. One interviewee suggested that any motive put forward by providers other than the financial was a pretext, and that foreign providers would always seek to make provision in the least expensive way: “If they cared about quality, they would send their own staff.” In this context, franchising and validation agreements were contrasted with joint degrees or articulation arrangements that are based on collaboration rather than what was seen as an uneven power relationship. However, this view presupposes that profit can work unrestricted by other pressures, not least reputation.

Concerns were also voiced about the impact that CBHE may have on the development of the domestic higher education system. In one response, CBHE was described as a new form of “colonisation,” where one country interferes heavily in another’s higher education system. This sort of intervention may also impede an expansion and diversification of domestic provision. It is possible to expand provision quickly without the cost and time involved in building up domestic provision.

The in-depth interviews also shed light on how the balance of risks and benefits can shift over time, as the example in the box below illustrates.

[Excursus 8: CBHE in Cyprus: changing pros and cons](#)

CBHE in Cyprus: changing pros and cons

When it gained independence in the early 1960s, Cyprus had no higher education sector. The state focused its attention on developing primary and secondary education, and private initiative was encouraged to develop tertiary provision. Consequently, a wide range of private colleges have come into existence since the 1980s. These institutions were operating without a legal framework until 1996. During that year an independent body, the Council of Educational Evaluation - Accreditation, was established and had the overall responsibility for organizing and overseeing the educational evaluation-accreditation process for the programmes of study of Private Institutions of Higher Education.

Since the beginning private institutions used franchising and validation arrangements. This delivered a number of benefits: it enabled programmes to be offered which would not have been possible and enabled colleges to respond very quickly to new market demand for higher education (faster than setting up a programme from scratch). Indeed, one interviewee suggested that it was “the entrepreneurship of private colleges and universities that led development.”

Over time, however, an indigenous HE sector has developed. The first state University, the University of Cyprus, accepted its first students in 1992, and the second state University, Cyprus University of Technology, was established in 2004. In 2002, the ‘Open University of Cyprus’ was founded offering distance learning programmes. In 2005 a legal framework was put in place that allowed colleges to apply for university status, and three former colleges did so in 2007. In 2007 three private universities were registered and given probationary license to operate based on the legislation regarding the establishment and operation of private universities in Cyprus. These universities are: ‘Frederick University’, ‘European University-Cyprus’ and ‘University of Nicosia’. In 2010, a fourth private university, ‘Neapolis University-Cyprus’ started its operation on the basis of a probationary license. Recently, in September 2012, the University of Central Lancashire – Cyprus received Initial Permission of Operation by the Ministry of Education and Culture. Furthermore, in 2011 the three private universities (Frederick University’, ‘European University-Cyprus’ and ‘University of Nicosia’) received final licence. Currently three public and five private universities and 36 Private Institutions of Higher Education are operating on the island.

This has changed the competitive environment and the way CBHE is perceived. The need to compete with universities provides an additional motivation for private colleges to enter into franchising arrangements, especially with countries and institutions of good reputation. The UK is a popular candidate with Cypriot colleges for historical and cultural reasons and because the UK higher education systems is considered to – as one interview partner put it – have “a good name”. UK bachelor’s degrees are popular also among the students as they take only three years to complete whereas Cypriot degrees take four. English-language instruction in subjects like IT is reported to be popular because of its international nature.

At national level, CBHE is regarded as providing opportunities for Cypriot students and opportunities for providers to learn from established universities which can have wide ramifications. It also contributes to the aim of Cyprus becoming a centre of educational services and research. However, the government cannot evaluate the quality of provision, and there are perceptions that franchised and validated programmes might be cheaper than developing home-grown ones.

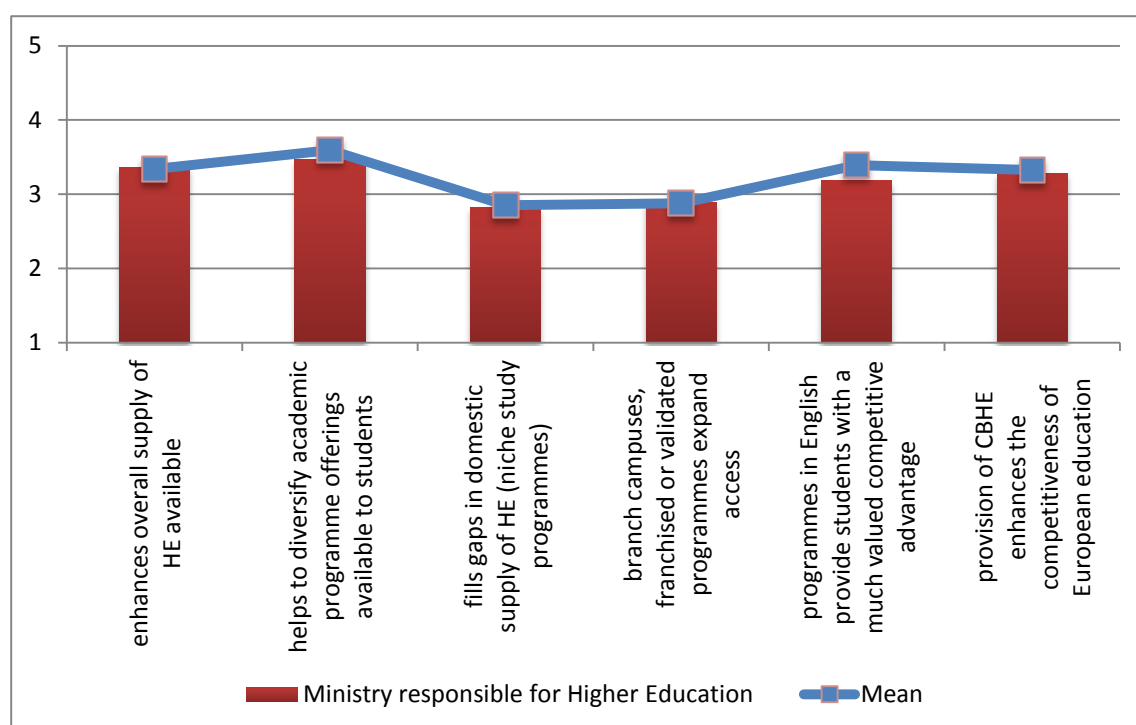
6.2.2. Benefits

Respondents were asked to indicate their assessment of how well the following benefits of CBHE activity are applicable to their country:

- It enhances the overall supply of higher education available
- It helps to diversify the academic programme offerings available to students
- It fills gaps in the domestic supply of higher education as they introduce unique and innovative niche study programmes
- Where domestic public or private provision of higher education is limited or highly restricted in certain subject areas or where there is considerable excess demand, branch campuses, franchised or validated programmes expand access
- As the preferred language of instruction for study programmes offered through branch campuses, validation or franchise agreements is English, this provides students with a much valued competitive advantage in today's globalised world
- The provision of cross-border higher education enhances the competitiveness of European education

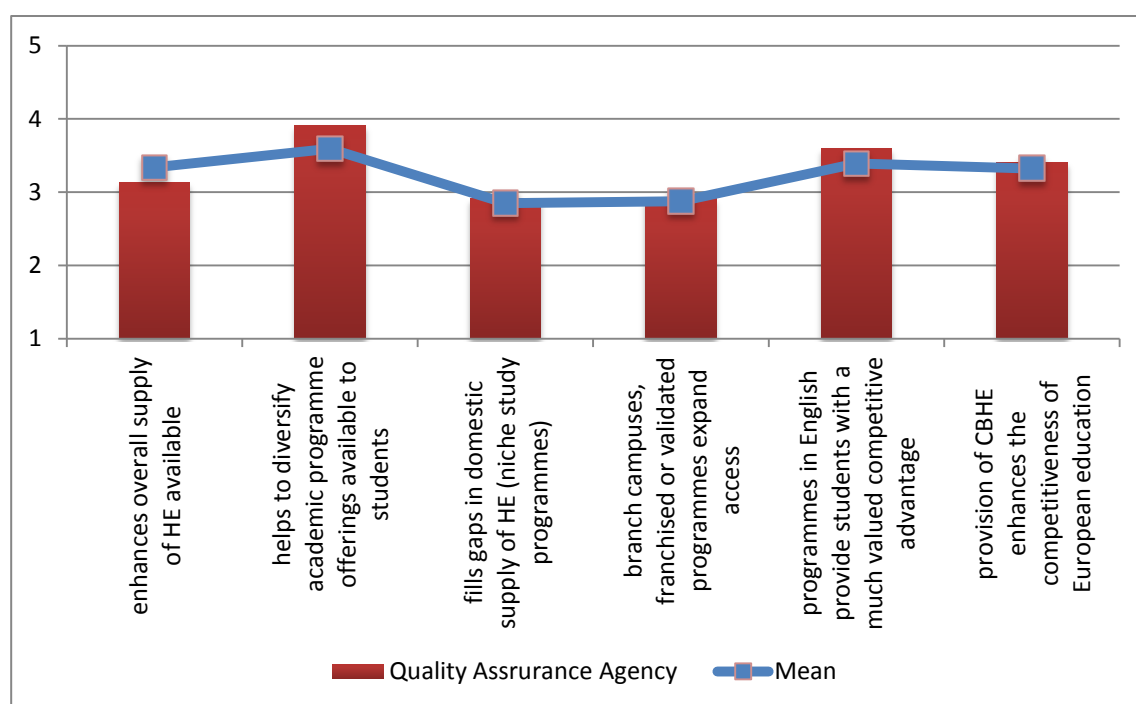
The mean across all countries and institutions is ranges between a neutral position (around 3) and slight agreement (4) regarding each potential benefit. Once again, the ministries' responses correspond closely to the average assessments across the range of potential benefits. Ministry respondents perceive programmes provided in the English to be somewhat less of a benefit than the average respondent.

Figure 39: Assessment of benefits by Ministries for Higher Education



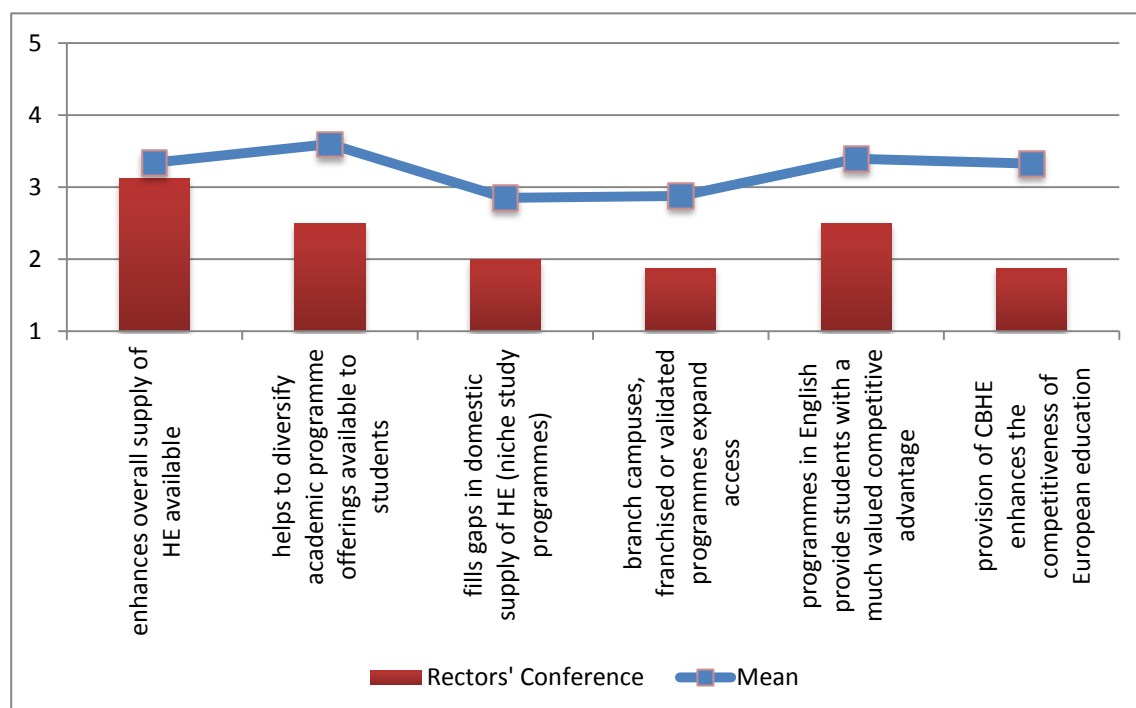
Quality assurance agencies too deviate only somewhat from the mean: They agree less that CBHE enhances the overall supply of higher education in the receiving country but agree more than the average respondent that it diversifies program offerings and that English language programmes constitute a competitive advantage for students.

Figure 40: Assessment of benefits by Quality Assurance Agencies



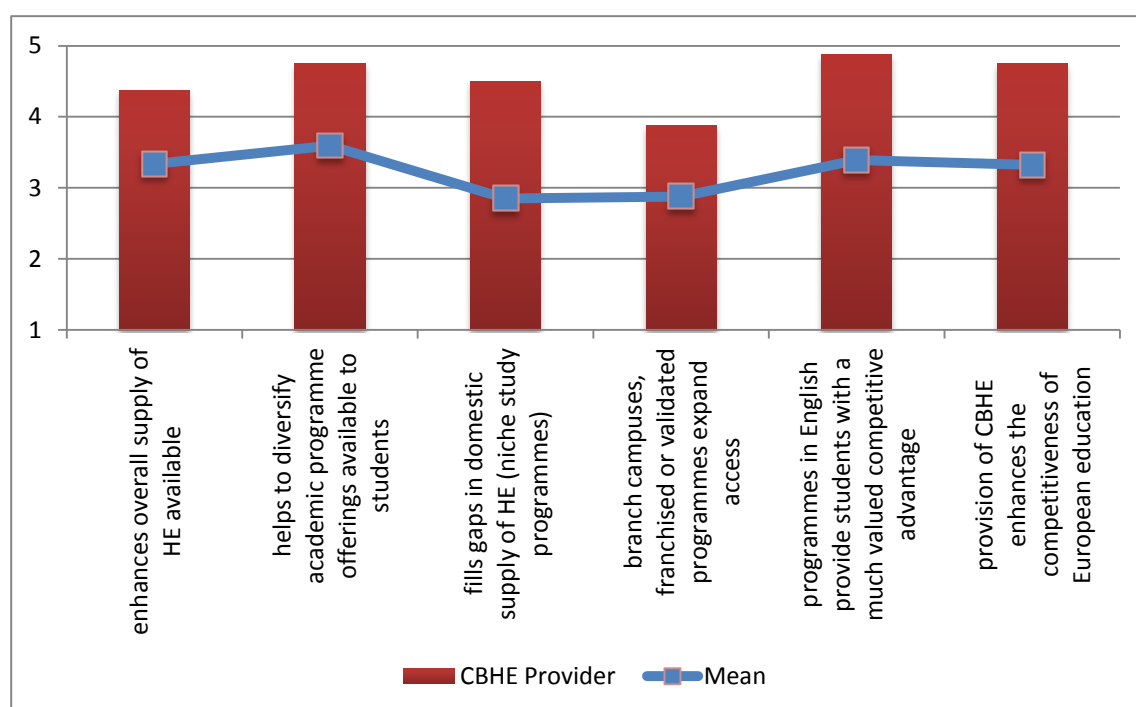
Rectors' conferences and similar umbrella organizations once again exhibit great deviation from the mean. On average, they do not see many benefits of CBHE, with the exception of a slight agreement with the statement that CBHE enhances the overall supply of higher education in the receiving country. They *disagree* or *rather disagree* that CBHE fills gaps in the domestic supply of higher education, that it expands access or enhances the competitiveness of European higher education.

Figure 41: Assessment of benefits by Rectors' conferences



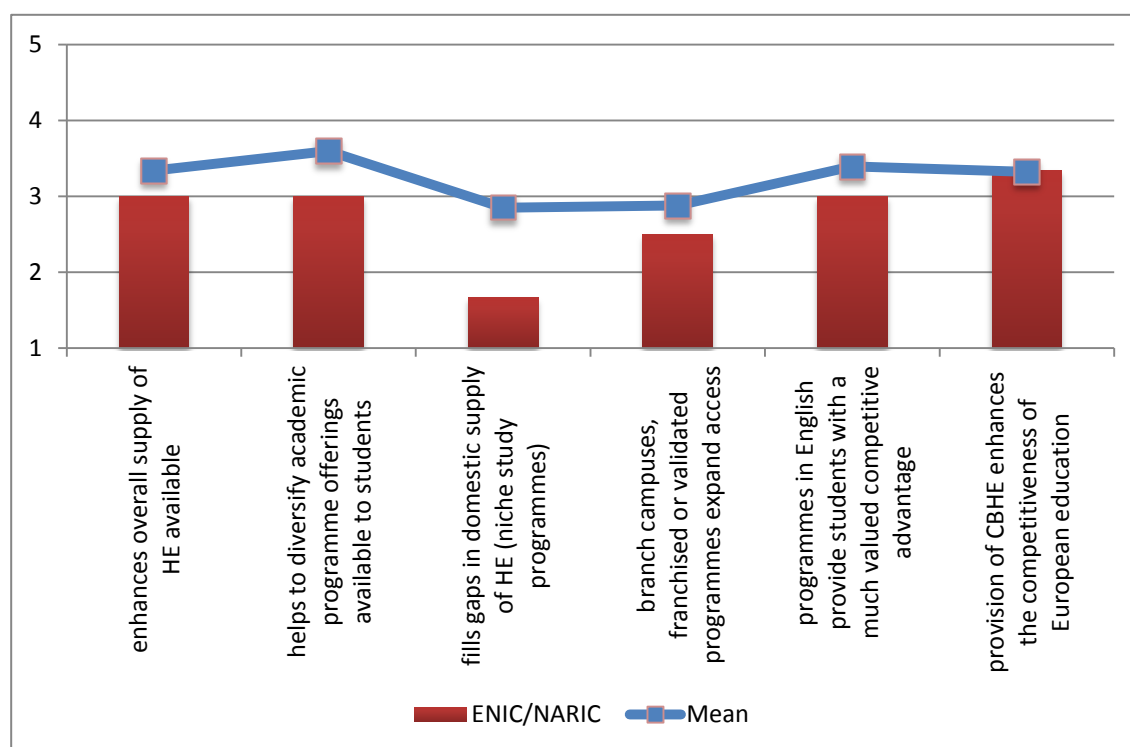
Providers, on the other hand, are convinced that CBHE has many benefits for the receiving countries, most notably a diversification of academic programme offerings and a competitive advantage for students if programmes are taught in English. They are also convinced that CBHE enhances the competitiveness of the European education.

Figure 42: Assessment of benefits by CBHE Providers



ENIC/NARIC bodies are more sceptical than the average respondent of the benefits CBHE may have, with the exception of a belief in an enhanced competitiveness of European education. ENIC/NARIC bodies disagree in particular that CBHE fills gaps in the domestic supply of higher education.

Figure 43: Assessment of benefits by ENIC/NARIC



Other benefits mentioned in the survey are that it creates alliances and builds bridges among countries, students and teaching staff and that it helps to provide higher education for language minority group in their national language.

The in-depth interviews conducted in four countries after the survey mirror some of the above benefits of CBHE: in the case of Cyprus, for example, interviewees indicated that franchising is a “good learning experience”. The use of the Quality Code developed by the UK’s Quality Assurance Agency for Higher Education in franchised programs has led to the introduction of better practices elsewhere in colleges and facilitates communication. In one college, a “significant upgrading of internal quality assurance procedures” was reported. The Quality Code is valued for its clarity in procedures, expectations and deliverables, and has been described as “the bible” for one institution. Transferring the QAA Code’s practices across an institution means that colleges can maximize the return on their “investment” in franchised provision.

Cypriot respondents indicated also that collaboration can have benefits for both faculty and administrative staff. Teaching and learning can be enhanced by introducing and then spreading good practice across an institution. In one instance, a long-term research-based cooperation is emerging from a franchising agreement with a UK partnering institution. Collaboration with partnering institutions abroad is also reported to have enabled improvements in administrative procedures, e.g. how to recruit students and run admissions procedures. What these experiences indicate, however, is that the benefits the local higher education system and its institutions may gain from CBHE activity is strongly contingent on the seriousness and responsibility with which it is pursued and on any quality assurance procedures that are applied.

6.3. Quality Issues

6.3.1. Context

There is an acute international awareness of the quality implications of cross-border education, as evidenced by the declaration *Sharing Quality Higher Education across Borders: a Statement on Behalf of Higher Education Institutions Worldwide*, which calls for responsible and effective provision of cross-border delivery and highlights, inter alia, issues of access and quality.³⁹ Crafting universally (or at least regionally) binding regulations on quality assurance and regulation of the cross-border provision of higher education is, however, impeded by the diversity of approaches to accreditation, recognition and quality assurance⁴⁰ as well as by different perceptions of threats and opportunities of the cross-border provision of higher education based on the national context⁴¹, also depending on trade interests. At the European level, the *Council Recommendation 98/561/EC of 24 September 1998 on European cooperation in quality assurance in higher education*, and *Recommendation 2006/143/EC of the European Parliament and the Council of 15 February 2006 on further European*

³⁹ (ACE, AUCC, CHEA, and IAU9 (2005). *Sharing Quality Higher Education Across Borders: A Statement on Behalf of Higher Education Institutions Worldwide*).

⁴⁰ (OECD/UNESCO, *Guidelines for the Quality Provision in Cross-border Higher Education*, 2005, p. 8).

⁴¹ (Martin/ Stella, *Module 5: Regulating and Assuring the quality of cross-border providers of higher education*, 2011, p. 16).

cooperation in quality assurance in higher education stressed the need for transparent quality assurance systems and enhanced European cooperation in this regard, which paved the way to the establishment of the *European Quality Assurance Register for Higher Education EQAR* in 2008. This register is based on the *2005 Standards and Guidelines for Quality Assurance in the European Higher Education Area* drawn up by the *European Association for Quality Assurance in Higher Education*. While stressing the need for legally binding quality assurance standards in higher education within the EU and setting out a first set of recommendations, these guidelines, however, bracket the area of cross-border delivery of higher education and instead merely refer to the *OECD/UNESCO Guidelines for Quality Provision in Cross-border Higher Education*. The European Commission has stated the need to further develop the European Standards and Guidelines and enhance a stronger European dimension in quality assurance in the *2009 Report from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions: Report on progress in quality assurance in higher education*, and will report on further progress in 2013.

The OECD/UNESCO guidelines emphasise transparency and capacity building and encourage international cooperation as well as bilateral and multilateral agreements in instituting and improving quality assurance mechanisms, with the aim of protecting students from low-quality cross-border providers of higher education and ensuring comparability of academic programmes. Besides the government, five other stakeholders are to be actively involved in quality assurance: cross-border education providers, student bodies, quality assurance and accreditation bodies, academic recognition bodies, and professional bodies.⁴² Concerning the cross-border provision of higher education, individual cases have been reported in which the provider itself, a national quality assurance agency or a subject-specific agency is in charge of quality assurance of cross-border higher education.⁴³ The OECD/UNESCO guidelines have, however, been criticised for being overly deterministic, inflexible⁴⁴ and insensitive to local contexts.⁴⁵

6.3.2. Findings

In general, the small numbers of responses received in the survey to questions concerning quality make interpretation difficult. Nonetheless, they shed some light on a number of aspects of this key issue provided the findings are treated with caution.

Respondents were asked to give their views on the quality of CBHE compared to domestic provision. The most striking aspect of these responses is that most respondents could not answer. This is likely to reflect the low incidence of CBHE in most countries as well as a lack of knowledge about the quality of CBHE provision that does exist. Unfortunately, this high level of non-response makes the sample size of those who did respond very small, so we cannot draw major conclusions from these questions. However, in relation to overall quality and quality of the curriculum it is notable that most respondents believed there to be no difference between CBHE and domestic provision, whilst

⁴² (OECD/UNESCO, *Guidelines for the Quality Provision in Cross-border Higher Education*, 2005).

⁴³ (ACA, *Transnational Education in the European Context - provision, approaches and policies: Executive Summary*, 2008, pp. 7-8).

⁴⁴ (Blackmur, *A Critical Analysis of the UNESCO/OECD Guidelines for Quality Provision of Cross-Border Higher Education*, 2007).

⁴⁵ (Pyvis, *The need for context-sensitive measures of educational quality in transnational higher education*, 2011).

respondents were more likely to question the quality of teaching staff and curriculum difficulty. It is also notable that the number of respondents believing provision to be worse tended to outnumber the number believing it to be better by at least two to one.

It is notable however that the vast majority of ministries did not answer these questions, and only half of the quality assurance agencies did so. This gives an indication of the extent to which there appears to be a lack of hard information regarding the quality of CBHE.

Figure 44: Respondents' assessment of overall quality of received CBHE

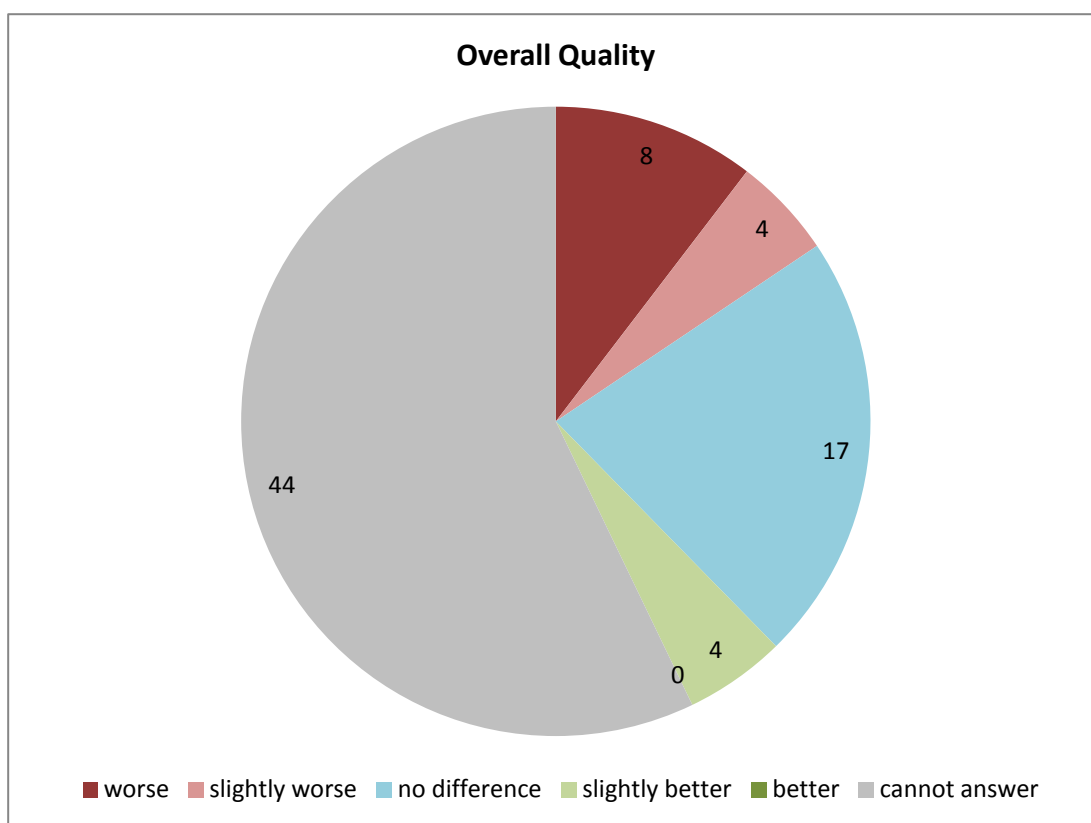


Figure 45: Respondents' assessment of the quality of the curriculum of received CBHE

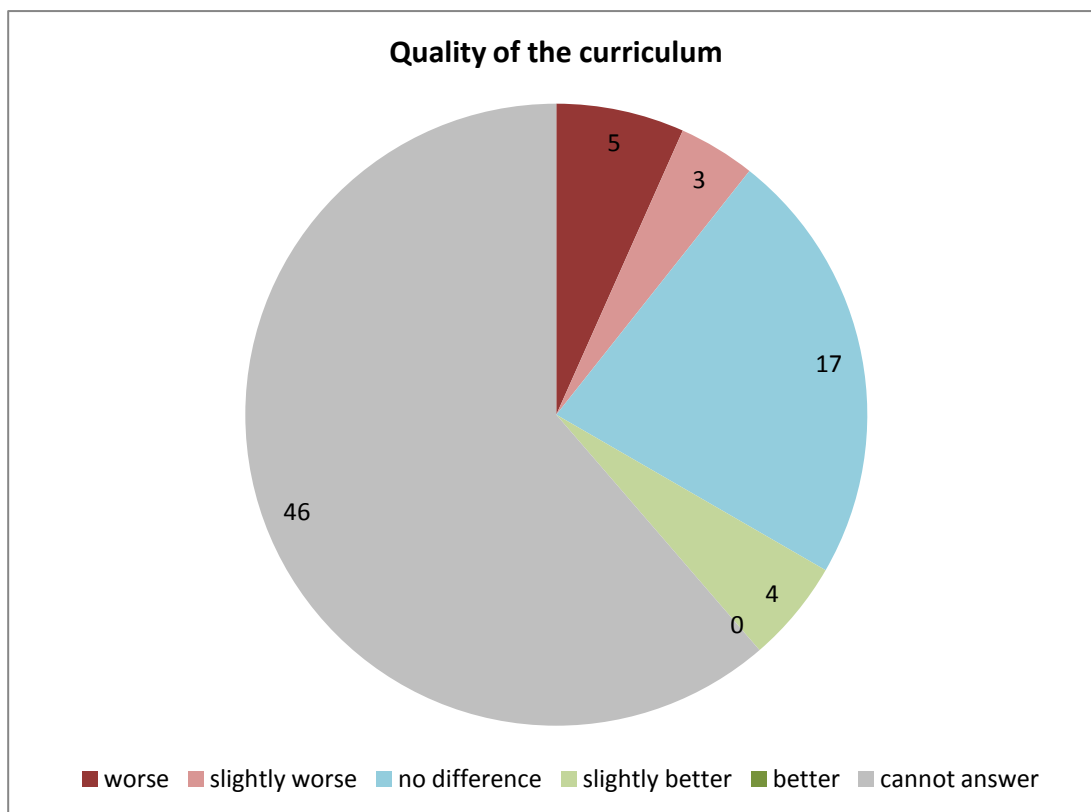


Figure 46: Respondents' assessment of the quality of teaching staff of received CBHE

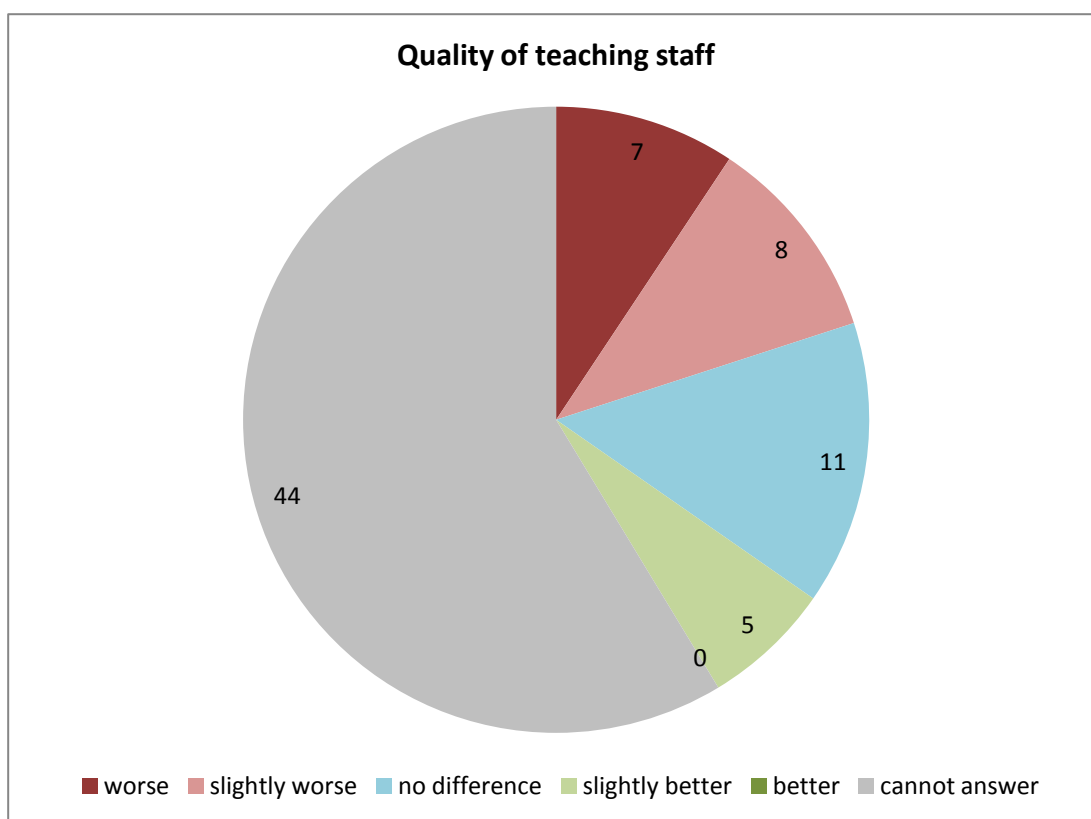
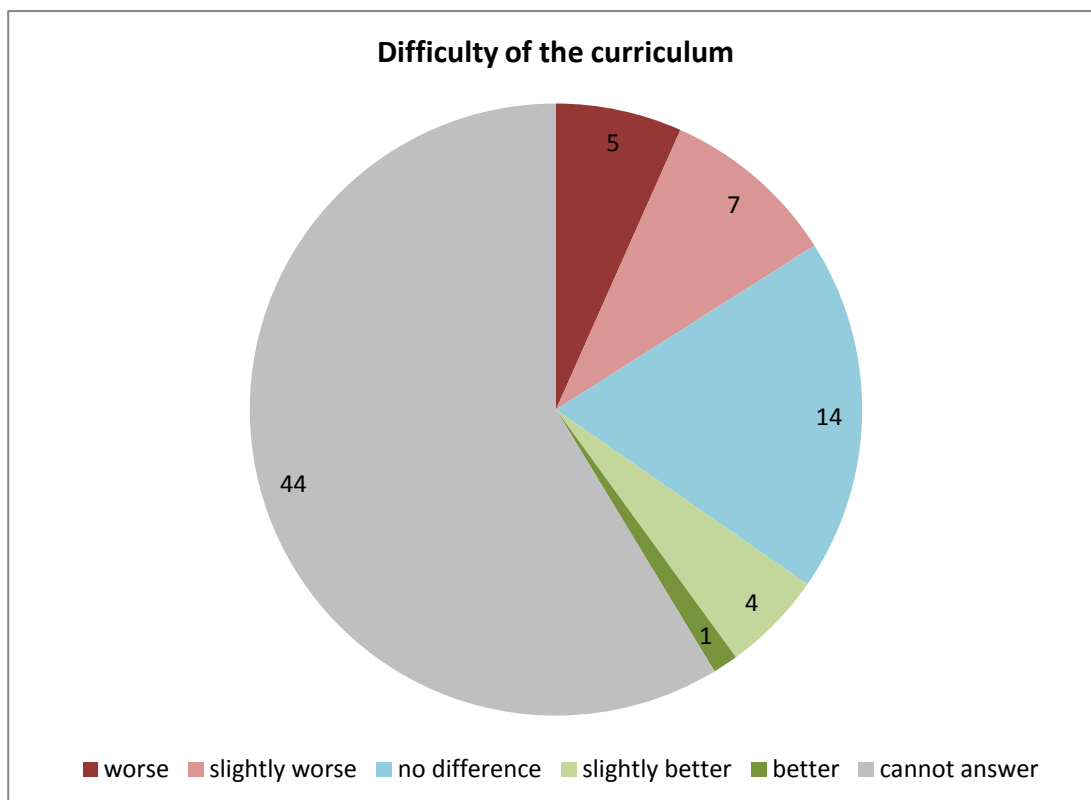


Figure 47: Respondents' assessment of the difficulty of the curriculum of received CBHE



Breakdown by type of institution:

Figure 48: Assessment of overall quality by type of institution

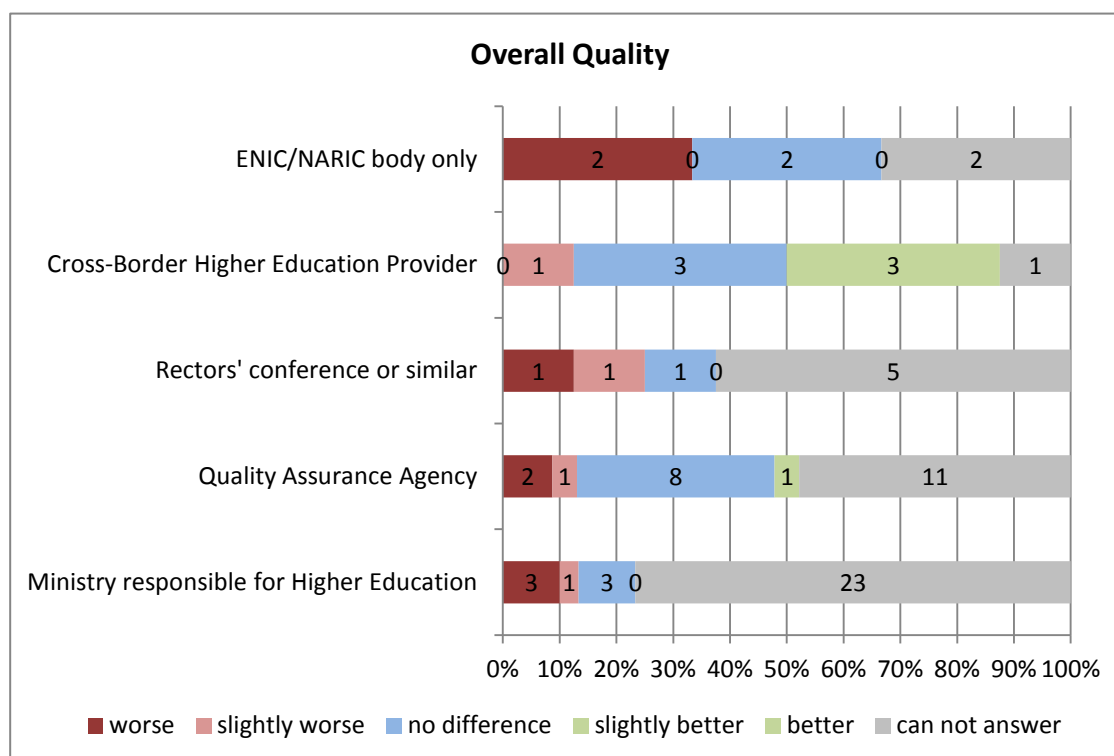


Figure 49: Assessment of the quality of the curriculum by type of institution

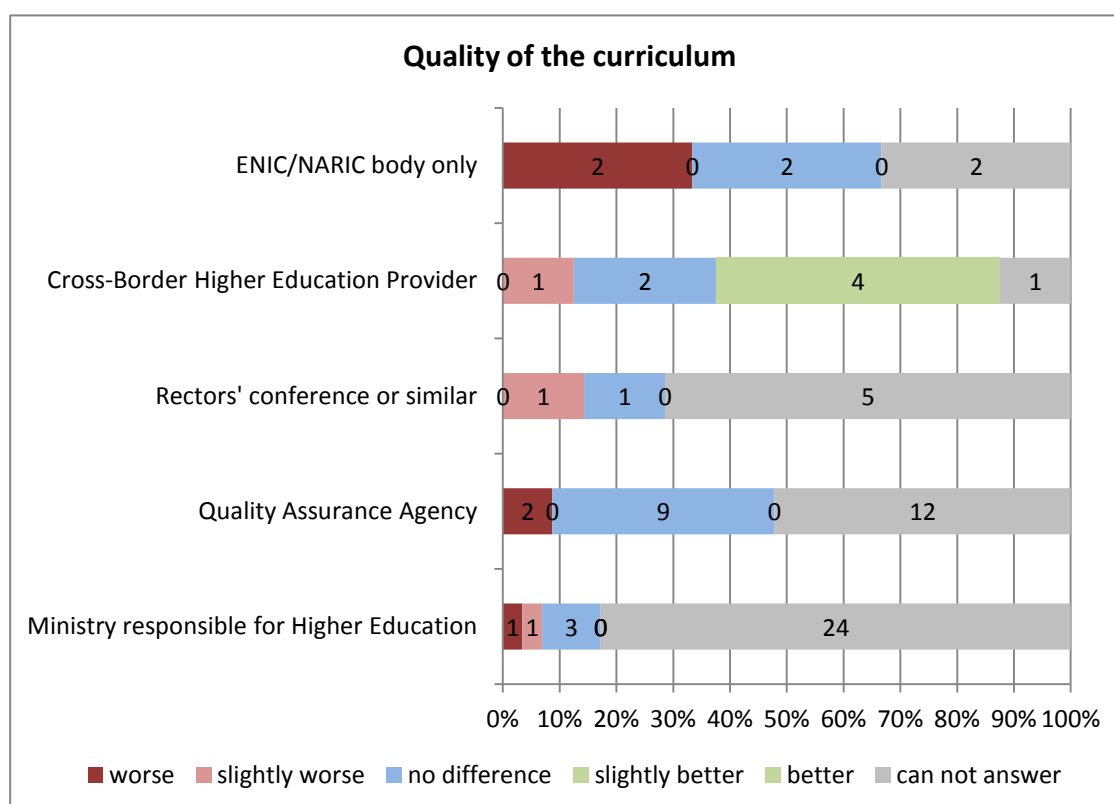


Figure 50: Assessment of the quality of teaching staff by type of institution

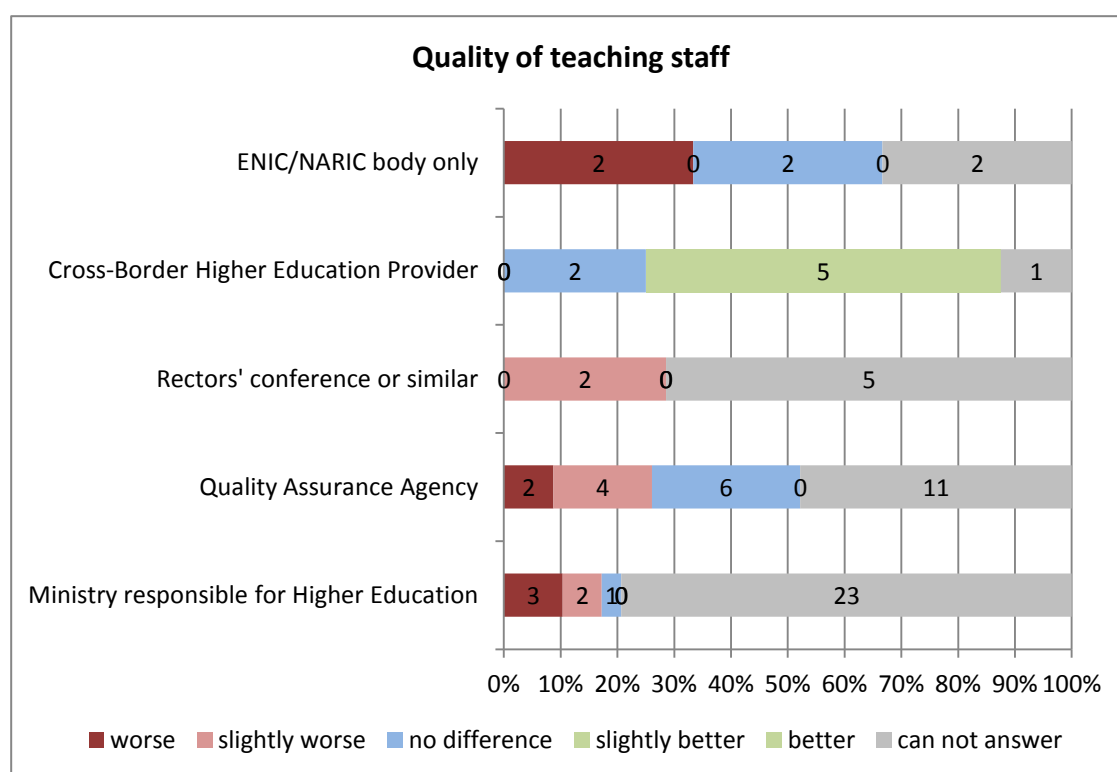
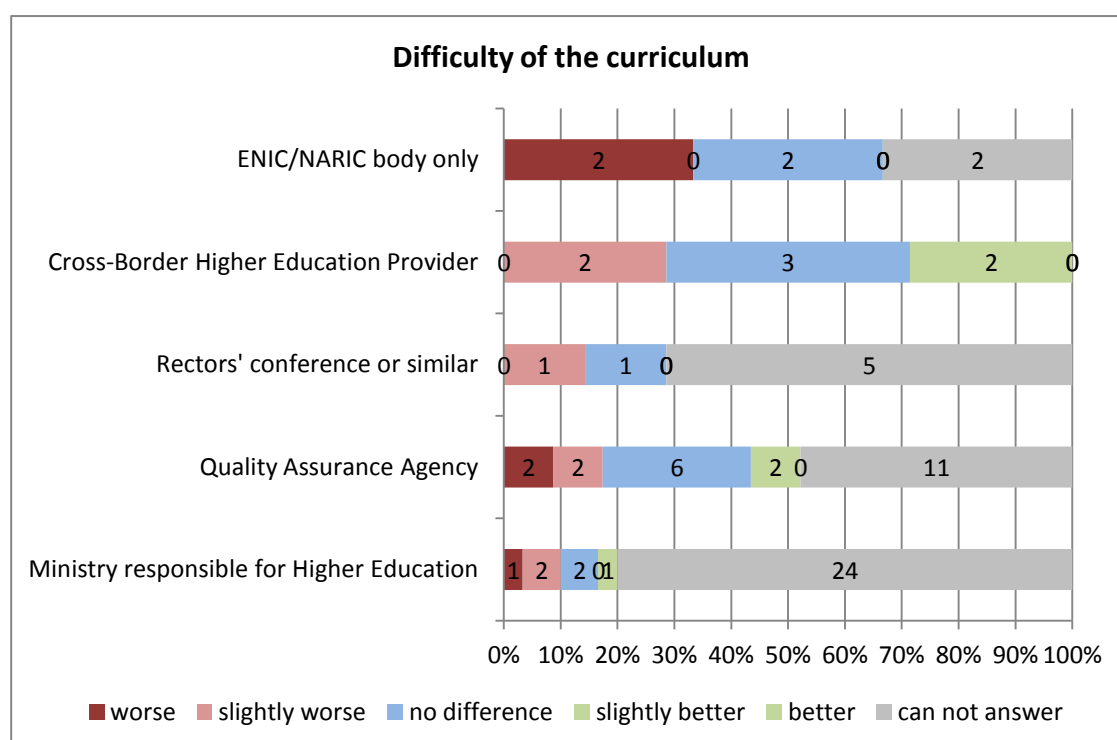


Figure 51: Assessment of the difficulty of the curriculum by type of institution



Quality assurance agency representatives were also asked to indicate if they cooperate with quality assurance agencies from abroad and if they consider membership in EQAR to be conducive to the building of trust. With regard to the first issue, the number of quality assurance agencies which have agreements with such agencies in other Member States roughly equals the number of those that do

not have these agreements. This indicates that there is potential to enhance the degree of cooperation between these agencies across Europe. The results also show that in only a tiny number of cases have quality assurance agencies refused accreditation of CBHE.

In relation to the question of the degree to which EQAR helps to build trust, most respondents tended to agree that it does, although around one third neither agreed nor disagreed with the statement.

Figure 52: Responses of Quality Assurance Agencies

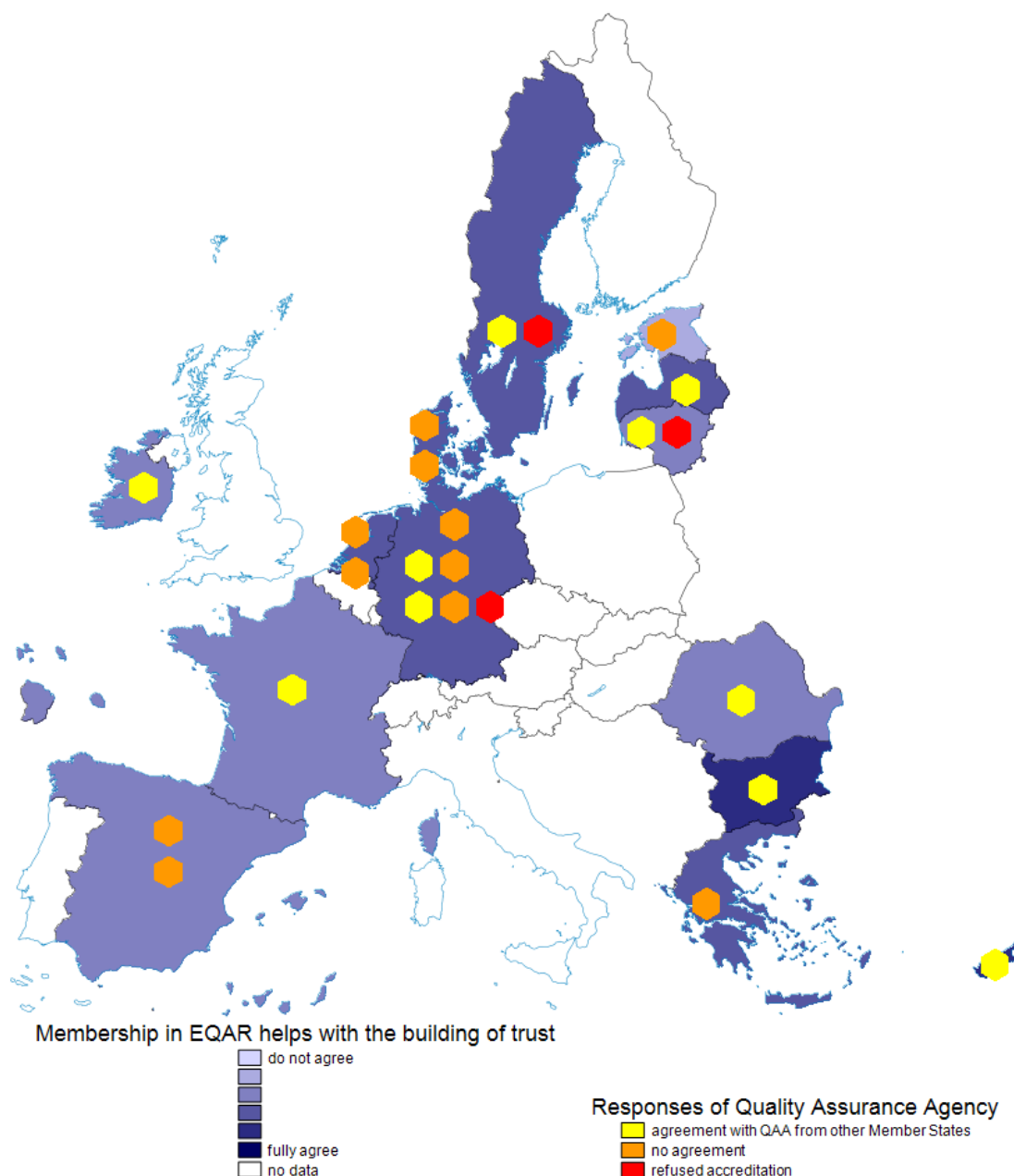


Figure 53: "Does membership in EQAR help the building of trust?" - analysis by country

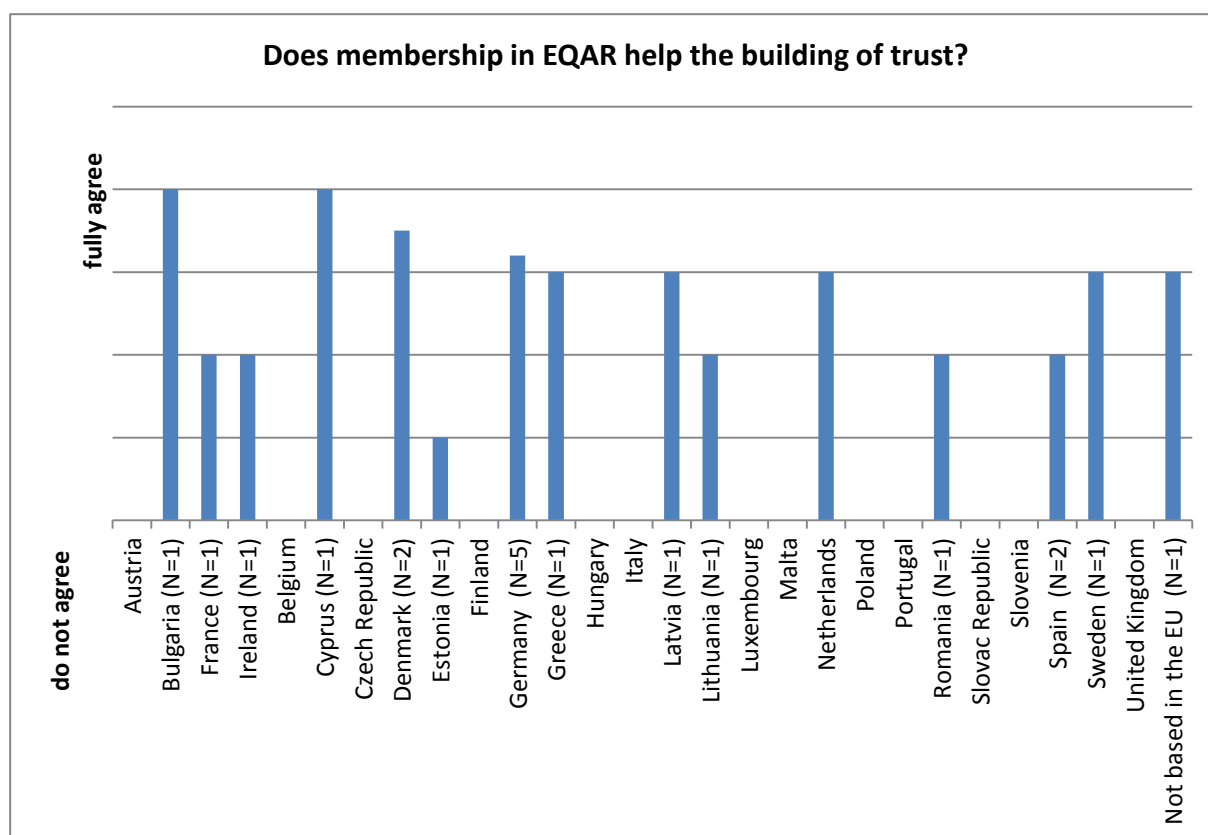
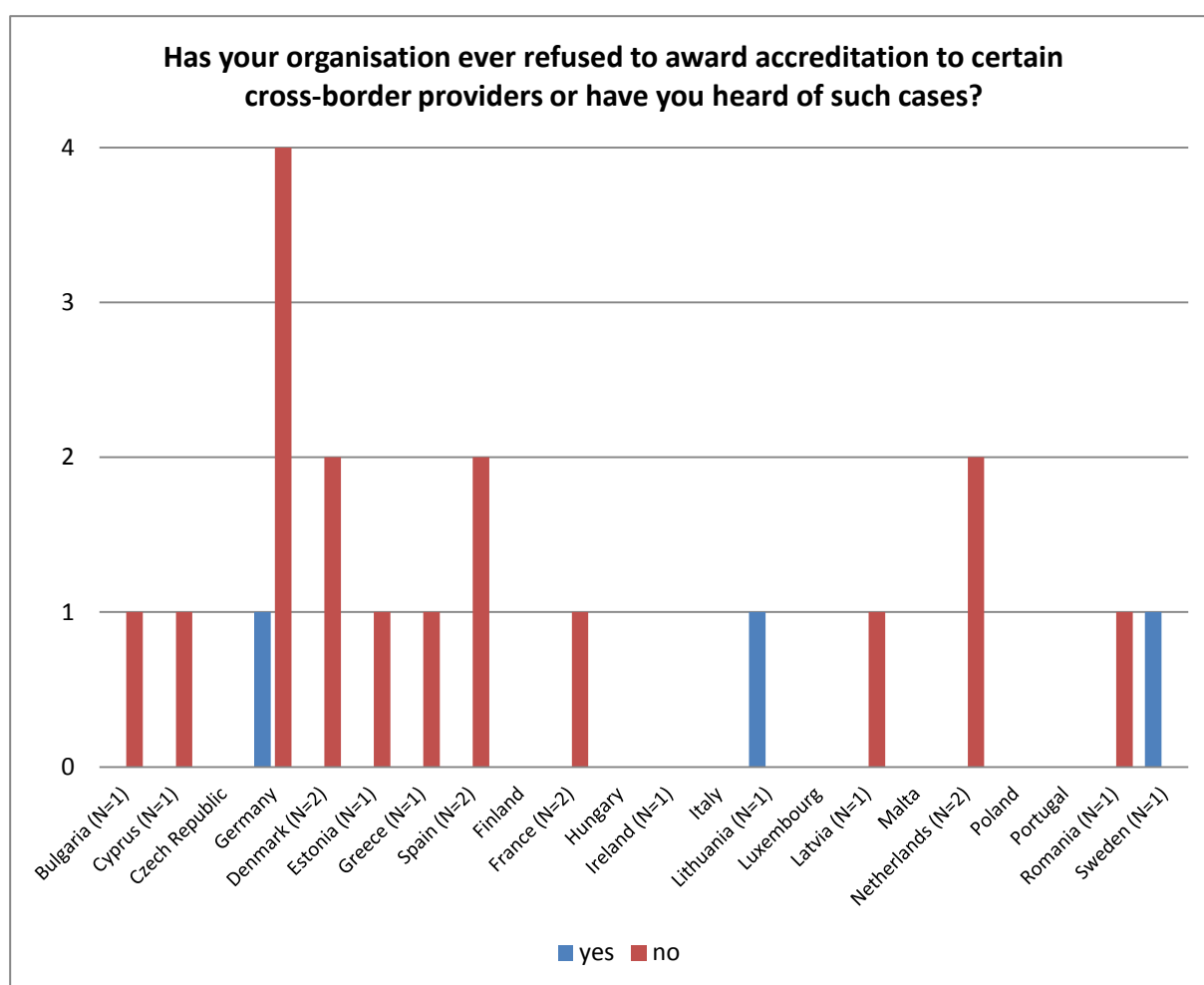


Figure 54: Refused accreditation by country



Among interview partners in the in depth-interviews, positions on EQAR were mixed, although there was general agreement about the merits of increased cooperation at the EU or EHEA-level, and positive experiences of cooperation between quality assurance agencies were reported. Quite a few respondents did not consider EQAR (at least in its current form) to be the best vehicle for further cooperation, pointing to loopholes or expressing overall criticism of the usefulness of the register. One respondent, while acknowledging that accreditation by an EQAR-member is a basic indicator of quality and thus provides a minimum of security, attests EQAR to be of limited merit when it comes to ensuring the quality of CBHE as it focuses exclusively on quality assurance agencies and not on higher education institutions: drawing inferences about the quality of programs based on the agency that accredited the exporting institution is difficult.

Several suggestions for enhancing cooperation across borders were made which span a spectrum from voluntarist approaches to legally binding guidelines:

- developing common guidelines to complement the OECD/UNESCO *Guidelines for Quality Provision in Cross-border Higher Education* might be developed. One respondent described the current Guidelines as insufficient as they focus on processes and not on the quality and content of programs.

- developing common standards as a reference point and guarantee through a body like EQAR in order to offer protection to ‘good’ CBHE providers from the damage done by ‘bad’ providers to the field as a whole – i.e. there is a risk of reputational damage by (perceived) association (irrespective of whether the perception is justified or not).
- comprehensive and legally binding guidelines might be included in the *European Standards and Guidelines for Quality Assurance*, an idea supported by one CBHE provider as a unified approach can facilitate the establishment of CBHE arrangements while at the same time offering protection from rogue providers and degree mills.

Nevertheless, it is impossible to predict how dialogue and exchange on CBHE is going to develop in the near future. The very light touch approach pursued by some countries, such as France, indicates that in some places there is little concern about CBHE and little interest in regulating it (although the research team has identified eleven instances of CBHE activity in France). Other interview partners expressed the belief that CBHE is a phenomenon on the rise and that a concomitant increase in cooperation and dialogue is unavoidable. One interview partner suggested that only a multilateral approach would be viable, owing to the multitude of bilateral relationships that would otherwise exist. Another respondent emphasized that while the cross-border provision of higher education is on the rise globally and in Europe as a whole, CBHE may not be a pan-European phenomenon and might therefore not affect all states equally, if at all (a finding that is confirmed in the mapping). A group of interested or affected states might enter into deeper exchange and cooperation or bilateral cooperation might proliferate.

An Austrian respondent reported positive experiences with cooperation between quality assurance agencies across borders and expects that furthering such cooperation would produce significant quality improvements of CBHE provision. The respondent suggested also that quality assurance agencies in the exporting and receiving country might develop joint procedures and coordinated processes. Ideally, they may carry out joint evaluations of CBHE services. In a similar vein, another respondent suggested that the QA body in the exporting country could draw up agreements with the QA body in the receiving country through which the latter would monitor assessment on the former’s behalf.

6.4. Observations and Interpretations

Perhaps the most striking single fact to emerge from the research is the lack of hard evidence available to inform national and European debates on the question of CBHE. The only example of data gathering of overseas provision collected in a systematic way was found to be the country reviews conducted by the UK’s QAA, though the most recent examples cover provision by UK institutions in countries outside Europe, and other examples may exist. In the absence of evidence, perceptions and mis-perceptions dominate. CBHE is a tiny fraction of most countries’ HE at the moment but where it does reach high levels, the topic can become highly charged and points of view can become polarised.

Interestingly, amongst those respondents with most control over policy questions – ministries and quality assurance agencies – there seem to be no major concerns regarding the risks commonly

associated with CBHE. Equally, they tend to be rather neutral with regards to the benefits. As you might expect, providers tend to perceive fewer risks and more benefits, whilst rectors' conferences and umbrella organisations tend to see fewer benefits.

In relation to the issue of quality, there appears to be a lack of knowledge regarding the actual quality of CBHE, especially on the part of ministries and quality assurance agencies, which might be explained in part at least by the low incidence of CBHE itself in many countries. This may explain the tendency of these stakeholders to be neutral with respect to risks and benefits.

In light of the findings of section 5 one might ask about the reasons for the amount of regulation in many parts of Europe. In light of the apparent lack of hard evidence regarding quality, we might interpret the existence of regulatory frameworks as insurance against potential poor quality provision.

At the same time, this section has also indicated that there is scope to develop relationships between quality assurance agencies in Europe and the role of the EQAR. These may well be fruitful avenues to explore as complementary or perhaps alternative mechanisms to the current approaches to regulation. It may be beneficial to take the recommendations contained in "Toward Effective Practice in Discouraging Degree Mills in Higher Education"⁴⁶ developed by UNESCO and CHEA (US Council on Higher Education Accreditation) into consideration, which place a particular focus on access to reliable information as well as other CHEA activities in this field.

⁴⁶ http://www.chea.org/pdf/degree_mills_effective_practice.pdf

7. Overarching Observations and Conclusion

This report has set out the findings of the study in three areas: current CBHE activity; existing regulatory frameworks; and perceptions in relation to risks, benefits and quality. In this concluding section we summarise the main findings in each of these areas and the links between them.

Pattern of CBHE provision in EU Member States

In chapter 4 we saw that the pattern of current CBHE activity is quite scattered and fragmented and that private institutions play an important role especially in receiving CBHE. In relation to the export of CBHE, the domination of institutions from Anglophone countries reported widely in the literature is reinforced. UK institutions play a particularly important role in CBHE exports to Southern Europe.

It seems clear that opportunities for CBHE are created where the kind or quantity of supply of higher education domestically does not meet demand. A strong statistical relationship was found between CBHE levels being received and outgoing student mobility which gives some support to this relationship existing in Europe. In some countries it may be a general lack of modernization within whole systems which provides an overall context for high levels of CBHE. In others, it might be more a question of insufficient quantity or quality of provision relative to demand in specific areas (or niches). Whether such opportunities are taken by exporting higher education institutions will depend on their own assessment of the risks and benefits, along with the obstacles which might stand in their way in relation to regulatory frameworks.

At the same time, the findings in relation to motivations highlight the need to take into account both sides of the partnerships involved in CBHE: it is not simply a question of passive recipients and active exporters. This is important since it reminds us that quality assurance should be about supporting both sides to develop and maintain high quality.

Chapter 4 also revealed the general paucity of good quality, reliable data that is held centrally in Member States. This manifested itself in particular in the difficulties we experienced in differentiating between franchising and validation. There is evidently a need for a much stronger understanding of patterns of CBHE at the level of individual countries. Such data would be a prerequisite for improving the information made available to students.

Regulation of CBHE in EU Member States

Chapter 5 has shown the varied picture that exists in relation to the extent of regulation with around one quarter of Member States having no regulation and over one fifth with strict regulation. In relation to the reasons for these variations in procedures, the relationship between regulation and the incidence of CBHE is weak. There is little to suggest that current regulatory frameworks are founded on evidence-based policy-making. In this respect, the example from Austria of a step-by-step approach will merit attention going forwards, not least because their current pattern of importing and exporting CBHE is probably similar to a large number of countries.

Chapter 5 also showed a striking contrast between regulation of incoming CBHE and exported CBHE, with, on the whole, very little regulation by Member States of their higher education institutions' activities beyond their own borders. At the same time, most countries with some form of regulation rely substantially upon the accreditation processes of other countries as a means of trying to safeguard the quality of CBHE which they receive. In this regard, the UK's QAA's its approach to auditing the exports of UK providers is a good practice.

Both chapters 5 and 6 revealed widespread limited knowledge amongst respondents about CBHE in terms of both perceived risks and benefits and effects. At the same time, it was notable that many respondents expressed a desire for more regulation, even in countries with levels of regulation which this study has shown to be high. Hard evidence in this field seems to be lacking, even taking into account the low incidence of CBHE in many countries. Respondents with a role in policy-making appear to be neutral in relation to both risks and benefits, and yet in many countries it has been made very difficult for foreign providers to operate either at all or effectively and efficiently.

These chapters also raised the issue of how best to assure CBHE quality – at the institutional or programme level. Institutional level accreditation has merits in terms of its lightness of touch and cost-effectiveness. At the same time, it is programmes that are exported not institutions. How to balance out these forces can be an important issue for the future.

Scope for cooperation in the EU

At this point in the study, we have speculated that, on the face of it, much regulation appears to be a reaction to concerns, the putting in place of measures “just in case”. Member States appear to have relied upon their own resources to ensure protection for students and their own institutions, and there appears to be scope to develop cooperative arrangements. Indeed, the findings in chapter 5 in relation to the current state of development of relationships between quality assurance agencies and the role of the EQAR indicate that there is scope to develop alternative measures based on driving up quality rather than restricting the ability to operate. Although most countries already rely upon the accreditation procedures of others, it is a moot point to what extent this is an act of faith as much as a convenience. It is clear that quality procedures vary substantially between countries and providers. Without transparency tools for registration or accreditation major variations in quality – and loopholes for rogue providers to exploit - are likely to exist. There is also scope for individual countries to pay more regard to the quality of their own institutions' exports for the mutual benefit of Europe.

8. Annex

8.1. Delphi Participation Statistics

[Table 4: Participating ministries in the CHE Experts Delphi](#)

Country	Name of Ministry
Belgium	Flemish Dept of Education and Training
Belgium	Flemish Ministry of Education
Croatia	Croatian Ministry of Science, Education and Sports
Denmark	Ministry of Science, Technology and Innovation
Greece	Ministry of Education, Lifelong Learning and Religious Affairs
Hungary	Hungarian Ministry of National Resources
Italy	MIUR (DG Affari Internazionali)
Latvia	Ministry of Education and Science
Malta	National Commission for Higher Education
Slovakia	Ministry of Education, science, Research and Sport
Slovenia	Slovenian Ministry of Education, Science, Culture and Sport
Spain	Ministry of Education
UK	Scottish Government
UK	UK Department of Business, Innovation and Skills

[Table 5: Participating umbrella organisations in the CHE Experts Delphi](#)

Country	Name of Umbrella Organisation
Austria	Österreichische Universitätskonferenz
Denmark	ACE Denmark
EU	ETUCE
Ireland	Institutes of Technology
Ireland	Higher Education Colleges Association
Malta	University of Malta
Slovenia	Head of ENIC NARIC
Sweden	The Association of Swedish Higher Education (Sveriges universitets- och högskoleförbund)

[Table 6: Participating quality assurance bodies in the CHE Experts Delphi](#)

Country	Name of Quality Assurance Body
Austria	Österreichischer Akkreditierungsrat
EU	European Quality Assurance Register for Higher Education (EQAR)
EU	European Evangelical Accrediting Association
Germany	Akkreditierungs-, Zertifizierungs- und Qualitätssicherungs-Instituts
Germany	Evaluationsagentur Baden-Württemberg
Germany	Foundation for International Business Administration Accreditation
Latvia	Higher Education Quality Evaluation Centre
Lithuania	Centre for Quality Assessment in Higher Education
Netherlands	Quality Assurance Netherlands Universities
Netherlands	Nederlands-Vlaamse Accreditatieorganisatie
Netherlands	Inspectie van het Onderwijs
Poland	The Polish Accreditation Committee
Sweden	Högskoleverket (Swedish National Agency for Higher Education)

[Table 7: Participating providers in the CHE Experts Delphi](#)

Spain	Saint Louis University Madrid
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[Table 8: Other participating stakeholders in the CHE Experts Delphi](#)

Ireland	Institute of Art Design and Technology
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8.2. Main Survey Participation Statistics

[Table 9: Participation by country](#)

	Number of respondents	Percentage of total respondents
AT - Austria	3	3.3%
BE - Belgium	5	5.4%
BG - Bulgaria	3	3.3%
CY - Cyprus	2	2.2%
CZ - Czech Republic	2	2.2%
DE - Germany	15	16.3%
DK - Denmark	4	4.3%
EE - Estonia	4	4.3%
EL - Greece	4	4.3%
ES - Spain	5	5.4%
FI - Finland	4	4.3%
FR - France	4	4.3%
HU - Hungary	2	2.2%
IE - Ireland	4	4.3%
IT - Italy	3	3.3%
LT - Lithuania	3	3.3%
LU - Luxembourg	1	1.1%
LV - Latvia	3	3.3%
MT - Malta	2	2.2%
NL - Netherlands	4	4.3%
PL - Poland	1	1.1%
PT - Portugal		
RO - Romania	1	1.1%
SE - Sweden	4	4.3%
SI - Slovenia	1	1.1%
SK - Slovak Republic		
UK - United Kingdom	4	4.3%
Not based in the EU	4	4.3%

* The high number for participants from Germany is partly due to its federal structure (16 Länder) and its high number of registered quality assurance agencies (As of July 2012 there are 10)

Table 10: Participation by type of institution

	Number of respondents	Percentage of total respondents
Ministry responsible for Higher Education	35	38.0%
Quality Assurance Agency	24	26.1%
Rectors' conference or similar	8	8.7%
Cross-Border Higher Education Provider	13	14.1%
ENIC/NARIC body only (NOT any of the above)	5	5.4%
other	7	7.6%

Table 11: List of participating institutions by country

Austria	Austrian Federal Ministry of Science and Research (BMWF) Austrian Association of Universities of Applied Sciences Universities Austria
Belgium	ENQA Flemish Ministry of Higher Education IPF Multiversity - Martin Buber University, a.i.s.b.l. Ministry of the Federation Wallonia-Brussels University of Kent, Brussels campus
Bulgaria	Ministry of Education, Youth and Science NAOA National centre for information and documentation
Cyprus	Council of Educational Evaluation and Accreditation Cyprus Ministry of Education and Culture
Czech Republic	Ministry of Education, Youth and Sports University Of Northern Virginia - Prague
Germany	ACQUIN AQAS Authority for Science and Research Hamburg European Evangelical Accrediting Association evaluation agency Baden-Wuerttemberg German Accreditation Council German Rectors' Conference GISMA Business School Ministry of Education of Schleswig-Holstein Ministry for Science and Culture Lower Saxony Ministry of Science and Economic Affairs Ministry of Science and Economics Saxony-Anhalt Northrhine-Westphalian Ministry of Innovation, Science & Research State Chancellery, departement of Higher Education Thuringian Ministry of Education, Science and Culture
Denmark	ACE Denmark Danish Evaluation Institute Danish Ministry of Science, Innovation and Higher Education

	Ministry of Science, Innovation and Higher Education
Estonia	Archimedes Foundation Estonian Higher Education Quality Agency Estonian Ministry of Education and Research Estonian Rectors' Conference
Greece	Hellenic Quality Assurance and Accreditation Agency (H.Q.A.) Ministry of Education, Lifelong Learning & Religious Affairs New York College The University of Sheffield Int. Faculty, CITY College
Spain	ACSUCYL Berklee College of Music - Valencia Campus Catalan University Quality Assurance Agency Saint Louis University - Madrid Campus Spanish Ministry of Education, Culture and Sports
Finland	Finnish National Board of Education Ministry of Education and Culture The Rectors' Conference of Finnish Universities of Applied Universities Finland UNIFI
France	AERES Commission des Titres d'Ingénieur ENIC NARIC Ministry of National Education, Youth and Sport
Hungary	Ministry of National Resources Budapest Business School
Ireland	Dublin Business School HETAC Higher Education Authority Institute of Art designa dn Technology Dun Laoghaire
Italy	CIMEA - NARIC Italia Italian Ministry for Education, Universities and Research Italian Ministry for Education, University and Research
Lithuania	Centre for Quality Assessment in Higher Education Lithuanian Ministry of Education and Science Lithuanian University Colleges Conference
Luxemburg	Luxembourg Ministry for Higher Education
Latvia	Academic Information Centre Foundation 'Higher Education Quality Evaluation Centre' Ministry of Education and Science Gesamt
Malta	Government of Malta National Commission for Higher Education
Netherlands	Accreditation Organisation of the Netherlands and Flanders European Association for Public Administration Accreditation Inspectorate of Education, the Netherlands Netherlands Ministry of Education, Culture & Science

Poland	Ministry of Science and Higher Education
Romania	Romanian Agency for Quality Assurance in Higher Educ. ARACIS
Sweden	Ministry of Education and Research SUHF - Association of Swedish Higher Education Swedish National Agency for Higher Education The National Agency for Higher Education/Swedish Enic Naric
Slovenia	Slovenian Ministry of Education, Science, Culture and Sport
United Kingdom	Anglia Ruskin University Department for Business, Innovation & Skills Higher Education Funding Council for England Scotland's Colleges
Outside EU	Croatian Agency for Science and Higher Education Ministry of Science, Education and Sports (Croatia) Norwegian Ministry of Education and Research Schiller International University

8.3. Survey Questionnaire

See separate document

8.4. Country Profiles

See separate document

8.5. List of CBHE Providers⁴⁷

Sending Country	Sending Institution	Funding	Receiving Country	Receiving Institution	Funding receiving institution	type
AT	Donau Universität Krems	public	DE	Akademiestiftung Hellweg	private	franchising/validation
AT	Sigmund FreudPrivat Universität	private	FR	Sigmund FreudPrivat Universität	private	branch campus
AT	Vienna Konservatorium	public	HU	Egressy Béni Művészetoktatási Intézmény	private	franchising/validation
Australia	Deakin University	public	DK	VIA University College	public	franchising/validation
BE	College of Europe	private	PL	College of Europe, Natolin Campus	private	branch campus
BG	Varna Free university and Varna Medical Univers	public	CY	Casa College	private	franchising/validation
CH	Victoria University	not identified	CZ	University of Northern Virginia Prague	private	franchising/validation
CH	Institut Universitaire Kurt Bösch	public	EL	New York College Athens	private	franchising/validation
CZ	Banking Institute/College of Banking (BICB) – Bankovní institut vysoká škola a.s.	private	SK	Banking Institute/College of Banking (BICB) – Bankovní institut vysoká škola a.s.	private	branch campus
DE	Internationale Hochschule Bad Honnef-Bonn	private	AT	IMC University of Applied Sciences Krems	private	franchising/validation
DE	Universität der Künste Berlin	public	DK	Metropolitan University College	public	franchising/validation
DE	FOM Hochschule für Oekonomie & Management gemeinnützige GmbH, Essen	private	LU	FOM Hochschule für Ökonomie & Management	private	branch campus
DK	Aalborg University	public	EL	ATHENS INFORMATION TECHNOLOGY (AIT) (ATHENS)	private	franchising/validation

⁴⁷ As of 7 September 2012

EE	Estonian Business School	private	FI	Estonian Business School Helsinki	private	branch campus
ES	Universidad Azteca / Universidad Católico San Antonio de Murcia	public	AT	emca academy	private	franchising/validation
ES	Universidad de Granada	public	HU	Nemzetközi Protokoll Iskola Magyarország Kft.	private	franchising/validation
FR	ESMOD international group	private	DE	ESMOD Berlin	private	branch campus
FR	UNIVERSITE PARIS 13	public	EL	Institution d'Etudes Francophones (IdEF) (ATHENS)	public	branch campus
FR	University of Strasbourg	public	EL	City Unity College	private	franchising/validation
FR	Ecole Supérieur de Gestion	private	EL	New York College Athens	private	franchising/validation
FR	Groupe Ecole Supérieure de Commerce de Toulouse de Francia	private	ES	Escuela Superior Europea de Comercio Barcelona	public	branch campus
FR	Conservatoire National des Arts et Métiers de Francia	public	ES	Centro "Salesianos Loyola – Centro de Estudios Superiores CNAM" Aranjuez	public	franchising/validation
FR	Conservatoire National des Arts et Métiers. (CNAM)	public	ES	Escuela Profesional Salesiana, Centro de Estudios Superiores CNAM - Zaragoza	public	franchising/validation
FR	IFAG (Institut de Formation aux Affaires et a la Gestion)	not identified	ES	European School of Management S.L. (ESM) La Laguna	private	franchising/validation
FR	IFAG (Institut de Formation aux Affaires et a la Gestion)	not identified	ES	Centro Escuela Superior de Management Algeciras (Cádiz)	public	franchising/validation
FR	L'Ecole D'Ingenieurs du CESI, París (Francia)	private	ES	Centro Fundación para la Formación Técnica en Máquinas y Herramientas de Elgoibar (Guipuzcoa)	public	franchising/validation
FR	Ecole Supérieure de Commerce de la Chambre de Commerce et D'Industrie de Bordeaux	public	ES	European Business Programme (Cámara Oficial de Comercio e Industria de Madrid)	public	franchising/validation
FR	Mod'Art International	private	HU	Modart Művészeti és Divatiskola	private	franchising/validation
FR	Université Paris Ouest Nanterre la Défense	public	HU	BBS Budapest Business School (Budapesti Gazdasági Főiskola)	public	franchising/validation
FR	Université Paris-Sorbonne	public	HU	Wekerle Sándor Business College	private	franchising/validation
FR	École d'Art Maryse Eloy	public	HU	Visart Academy of Applied Arts (Visart Művészeti Akadémia)	private	franchising/validation

FR	Grenoble Graduate School of Business	private	MT	Maltese International Institute of Studies (IIS)	private	franchising/validation
FR	University of Strasbourg	public	SE	Free University Stockholm	private	franchising/validation
HU	Budapest Business School	public	RO	Sapientia Erdélyi Magyar Tudományegyetem - EMTE (Sapientia Hungarian University of Transsylvania), Kolozsvár (Cluj Napoca)	private	franchising/validation
HU	Budapest Business School College of Commerce, Catering and Tourism	public	RO	MÜTF Oktatási Központ, Székelyudvarhely (MÜTF Education Center, Odorheiu Secuiesc)	not identified	franchising/validation
HU	Budapest Business School College of Commerce, Catering and Tourism	public	SK	Constantine the Philosopher University in Nitra, Faculty of Central European Studies	public	franchising/validation
IE	University College Dublín	public	ES	Centro de Estudios Superiores Universitarios de Galicia (CESUGA, S.L.). Cambio de nombre en 1997: Centro Superior de Estudios Universitarios de Galicia (CESUGA S.L.) A Coruña	private	franchising/validation
Iran	Islamic Azad University	private	UK	Islamic Azad University at Oxford	private	branch campus
IT	Pontifical Lateran University	private	LV	Riga Institute of Theology	private	branch campus
Japan	Teikyō-University	private	DE	Teikyō-University Berlin Campus	private	branch campus
Japan	Teikyō-University	private	NL	Teikyō-University Maastricht Campus	private	branch campus
LV	Riga Institute of Theology	private	Holy See	Lateran Pontifical university	private	franchising/validation
Malaysia	Open University Malaysia	private	HU	Eszterházy Károly College	private	franchising/validation
Malaysia	Limkokwing University of Creative Technology	private	UK	Limkokwing United Kingdom	private	branch campus
Mexico	Universidad Azteca / Universidad Católica San Antonio de Murcia	public	AT	emca academy	private	franchising/validation
MT	University of Malta (UoM)	public	IT	UoM Link Campus Rome	public	branch campus
N	Rudolf Steiner University College, Oslo	private	DE	Alanus Hochschule für Kunst und Gesellschaft, Alfter	private	franchising/validation
PL	Katowice Schools of Economics	private	AT	Katowice Schools of Economics	private	branch campus

PL	College of Management	private	CZ	College of Management- Management Faculty in Pardubice	private	branch campus
PL	Higher School of Management in Legnica	private	CZ	Higher School of Management	private	branch campus
PL	West Pomeranian Business School	private	DE	West Pomeranian Business School	private	branch campus
PL	Wyższa Szkoła Bezpieczeństwa Publicznego i Indywidualnego „Apeiron” w Krakowie	private	HU	RTF (ma: NKE) volt korábban	public	franchising/validation
PL	Higher School of Local Development in Żyrardów	public	IE	Higher School of Local Development in Dublin	public	branch campus
PL	University in Bialystok	public	LT	University in Bialystok branch in Vilnius (Lithuania)	public	branch campus
PL	European Higher School of Law, Warsaw	private	UK	European Higher School of Law	private	branch campus
PL	Pultusk Academy of Humanities	public	UK	Pultusk Academy of Humanities	not identified	franchising/validation
PT	University Ferdinando Pessoa	private	ES	University Fernando Pessoa, Canarias	private	branch campus
PT	University Ferdinando Pessoa	private	FR	University Fernando Pessoa, La Garde Cedex	private	branch campus
RO	USAMV Cluj Napoca	public	IT	USAMV Cluj Napoca (It) Viterbo	public	branch campus
Serbia	Megatrend Univerzitet	private	AT	Megatrend International University Vienna	private	branch campus
Serbia	University of Nish	public	EL	CITY UNITY COLLEGE	private	franchising/validation
Serbia	Megatrend Univerzitet	private	FR	Institut de management de Bozinoff (Paris)	private	branch campus
Serbia	Megatrend Univerzitet	private	UK	Megatrend University - West London Business School	private	branch campus
SI	Fakulteta za komercialne in poslovne vede FKPV Celje	private	AT	Institut für Management IFM	private	franchising/validation
SK	Paneuropäische Hochschule (PEVŠ) Bratislava	private	AT	Studienzentrum Hohe Warte	private	franchising/validation
TH	Mahachulalongkornrajavidyalaya University	public	HU	The Dharma Gate Buddhist College, (Tan Kapuja Buddhista Főiskola)	private	franchising/validation

UK	Middlesex University	public	AT	KMU Akademie & Management AG	private	franchising/validation
UK	The Manchester Metropolitan University	public	AT	ITM-International College of Tourism and Management	private	franchising/validation
UK	University of the West of Scotland	public	AT	Studien und Technologie Transfer Zentrum Weiz	private	franchising/validation
UK	Staffordshire University	public	AT	Werbe Akademie des Wirtschaftsförderungsinstitutes der Wirtschaftskammer	private	franchising/validation
UK	University of Kent	public	BE	University of Kent, Brussels	public	branch campus
UK	University of Wales	public	BE	UNITED BUSINESS INSTITUTES	private	franchising/validation
UK	University of Wales	public	BE	CONTINENTAL THEOLOGICAL SEMINARY (CTS)	private	franchising/validation
UK	University of Wales	public	BE	INTERNATIONAL ACADEMY OF OSTEOPATHY	private	franchising/validation
UK	Universities of Portsmouth and Cardiff	public	BG	International University Colle	private	franchising/validation
UK	Open University	public	BG	New Bulgarian University, Bulgaria	private	franchising/validation
UK	Middlesex University	public	CY	Intercollege Limassol	private	franchising/validation
UK	University of East London	public	CY	Ledra College	private	franchising/validation
UK	University of West London	public	CY	Cyprus Institute of Marketing (CIM)	private	franchising/validation
UK	London South Bank University	public	CY	Cyprus Institute of Marketing (CIM)	private	franchising/validation
UK	St. George's University of London	public	CY	University of Nicosia	private	franchising/validation
UK	University of Greenwich	public	CY	Intercollege Larnaca	private	franchising/validation
UK	University of Wolverhampton	public	CY	Global College	private	franchising/validation
UK	University of Sunderland	public	CY	European University of Cyprus	private	franchising/validation
UK	University of Hertfordshire & Univ of Middlesex	public	CY	Intercollege Nicosia	private	franchising/validation
UK	University of the West of England	public	CY	ALEXANDER COLLEGE	private	franchising/validation
UK	University of Wales	public	CY	ALEXANDER COLLEGE	private	franchising/validation
UK	University of Sunderland	public	CY	Cyprus College	private	franchising/validation
UK	University of Greenwich	public	CZ	University of New York Prague		franchising/validation

UK	University of Bolton	public	CZ	University of New York Prague		franchising/validation
UK	University of Wales	public	CZ	ANGLO-AMERICAN UNIVERSITY, PRAGUE	private	franchising/validation
UK	University of Wales	public	CZ	INTERNATIONAL BAPTIST THEOLOGICAL SEMINARY, PRAGUE	private	franchising/validation
UK	University of Sunderland	public	DE	International Business School Lippstadt	private	franchising/validation
UK	University of Bedfordshire	public	DE	Werbe- & Medien- Akademie Marquardt, Dortmund	private	franchising/validation
UK	University of Surrey	public	DE	International Business School Lippstadt	private	franchising/validation
UK	University of Bradford	public	DE	TiasNimbas Business School Germany GmbH	private	franchising/validation
UK	University of Wales	public	DE	PAREXEL-AKADEMIE, BERLIN	private	franchising/validation
UK	University of Wales	public	DE	OSTEOPATHIE SCHULE DEUTSCHLAND	private	franchising/validation
UK	University of Wales	public	DE	Hochschule für Unternehmensführung	private	franchising/validation
UK	London South Bank University	public	DK	International Business Academy	private	branch campus
UK	The University of Buckingham	private	DK	Zealand Institute of Business and Technology	private	branch campus
UK	Coventry University	public	DK	International Business Academy	private	branch campus
UK	Coventry University and London South Bank Unive	public	DK	International Business Academy	private	branch campus
UK	De Montfort University	public	DK	Niels Brock, Copenhagen Business Academy	private	franchising/validation
UK	The University of Buckingham	private	DK	Business Academy Aarhus	private	franchising/validation
UK	University of Wales	public	DK	COPENHAGEN LUTHERAN SCHOOL OF THEOLOGY	private	franchising/validation
UK	University of Wales	public	DK	LUTHERAN SCHOOL OF THEOLOGY, AARHUS	private	franchising/validation
UK	University of Sheffield	public	EL	CITY College, International Faculty of the University of Sheffield	public	branch campus
UK	UNIVERSITY OF DERBY	public	EL	MEDITERRANEAN COLLEGE	private	franchising/validation
UK	University of Derby	public	EL	Mediterranean College	private	franchising/validation
UK	University of Hertfordshire	public	EL	Independent Science and Technology Studies (IST), Athens	private	franchising/validation

UK	Brunel University	public	EL	Technological Education Institute (TEI) Athens	public	franchising/validation
UK	Kingston University	public	EL	ICBS ATHENS	private	franchising/validation
UK	LONDON CENTER OF MANAGEMENT	private	EL	MEDITERRANEAN COLLEGE	private	franchising/validation
UK	Brunel University	public	EL	Alexander Technological Educational Institute (ATEI) Thessaloniki	public	franchising/validation
UK	UNIVERSITY OF TEESIDE	public	EL	MEDITERRANEAN COLLEGE	private	franchising/validation
UK	University of Sunderland	public	EL	New York College Athens	private	franchising/validation
UK	University of Sunderland	public	EL	New York College Thessaloniki	private	franchising/validation
UK	Liverpool John Moores University	public	EL	City Unity College	private	franchising/validation
UK	University of Central Lancashire	public	EL	Institute of Counselling and Psychological Studies	private	franchising/validation
UK	University of Central Lancashire	public	EL	AAS COLLEGE APPLIED ARTS STUDIES (THESSALONIKI)	private	franchising/validation
UK	UNIVERSITY OF STRATHCLYDE	public	EL	International Management Studies	private	franchising/validation
UK	London Metropolitan University	public	EL	BCA COLLEGE AE (ATHENS)	private	franchising/validation
UK	Reading University	public	EL	ALBA (ATHENS)	private	franchising/validation
UK	University of Derby	public	EL	BAKALO ART & DESIGN (ATHENS)	private	franchising/validation
UK	UNIVERSITY OF EAST LONDON	public	EL	AKMI Metropolitan AE (ATHENS)	private	franchising/validation
UK	University of Greenwich	public	EL	New York College Athens	private	franchising/validation
UK	University of London	public	EL	DIE College	private	franchising/validation
UK	University of Bolton	public	EL	New York College Athens	private	franchising/validation
UK	University of Central Lancashire	public	EL	DIE College	private	franchising/validation
UK	UNIVERSITY OF CENTRAL LANCASHIRE	public	EL	AKMI Metropolitan AE (ATHENS)	private	franchising/validation
UK	QUEEN MARGARET UNIVERSITY	public	EL	AKMI Metropolitan AE (ATHENS)	private	franchising/validation
UK	UNIVERSITY OF WALES	public	EL	HELLENIC BRITISH COLLEGE	private	franchising/validation
UK	NOTTINGHAM TRENT UNIVERSITY	public	EL	MBS College (CRETE - IRAKLIO)	private	franchising/validation

UK	Anglia Ruskin University, Cambridge & Chelmsford	public	EL	Aegean Omiros College	private	franchising/validation
UK	University of Hertfordshire	public	EL	IST College	private	franchising/validation
UK	Middlesex University	public	EL	AKTO Art & Design (ATHENS)	private	franchising/validation
UK	Middlesex University	public	EL	AKTO ART & DESIGN (THESSALONIKI)	private	franchising/validation
UK	Liverpool Hope University	public	EL	Institute of Management and Entrepreneurship of Southeastern Europe in Thessaloniki	private	franchising/validation
UK	University of Central Lancashire	public	EL	DEI College	private	franchising/validation
UK	University of Central Lancashire	public	EL	Aegean Omiros College (ATHENS)	private	franchising/validation
UK	University of Strathclyde	public	EL	Institute of Counselling and Psychological Studies	private	franchising/validation
UK	Open University	public	EL	The American College of Greece - DERE College	private	franchising/validation
UK	UNIVERSITY OF PLYMOUTH	public	EL	ATTICO COLLEGE (ATHENS)	private	franchising/validation
UK	Cardiff Metropolitan University (UWIC)	public	EL	Perrotis College	private	franchising/validation
UK	University of Wales	public	EL	Aegean Omiros College	private	franchising/validation
UK	University of Wales	public	EL	Akmi Metropolitan College	private	franchising/validation
UK	University of Wales	public	EL	BRITISH HELLENIC COLLEGE	private	franchising/validation
UK	University of Wales	public	EL	CITY UNITY COLLEGE	private	franchising/validation
UK	University of Wales	public	EL	AMERICAN COLLEGE OF THESSALONIKI	private	franchising/validation
UK	University of Wales	public	EL	ANATOLIA (THESSALONIKI)	private	franchising/validation
UK	University Lincolnshire and Humberside	public	ES	Centro St Mary Barney's College Sevilla	private	franchising/validation
UK	University of Lincolnshire and Humberside	public	ES	Colegio Universitario Melchor de Jovellanos SANTANDER	private	franchising/validation
UK	University of Wolverhampton	public	ES	Escuela Superior de Negocios S.L. (E.S.N.E.)	private	franchising/validation
UK	University of Wolverhampton	public	ES	Escuela Superior de Negocios ESNE Bilbao	private	franchising/validation
UK	University of Wolverhampton	public	ES	Escuela Superior de Negocios S.L. (ESNE)	private	franchising/validation

				Sta. Cruz de Tenerife		
UK	University of Wolverhampton	public	ES	Escuela Superior de Negocios, S.L. Valnecia	private	franchising/validation
UK	Manchester Metropolitan University	public	ES	Fundación Escuela de Negocios M.B.A. Las Palmas de Gran Canaria & La Laguna Tenerife	private	franchising/validation
UK	Queen's University of Belfast	public	ES	Escuela Superior Empresarial de Relaciones Públicas (ESERP) Barcelona	private	franchising/validation
UK	Queen's University of Belfast	public	ES	Escuela Superior Empresarial de Relaciones Públicas (ESERP) Madrid	private	franchising/validation
UK	University of Northumbria at Newcastle	public	ES	Fundación Escuela de Negocios M.B.A. Las Palmas de Gran Canaria & La Laguna Tenerife	private	franchising/validation
UK	University of the West of England / Bristol University	public	ES	Fundación Escuela de Negocios M.B.A. Las Palmas de Gran Canaria & La Laguna Tenerife	private	franchising/validation
UK	Staffordshire University	public	ES	Escuela Superior Empresarial de Relaciones Públicas (ESERP) Barcelona	private	franchising/validation
UK	Sheffield Hallam University	public	ES	Fundación Escuela de Negocios M.B.A. Las Palmas de Gran Canaria & La Laguna Tenerife	private	franchising/validation
UK	University of Wales	public	ES	Escuela Superior de Comercio Internacional y Marketing - Las Palmas de Gran Canaria	private	franchising/validation
UK	University of Wales	public	ES	Centro IUSC (International University Study Center) Barcelona	private	franchising/validation
UK	University of Wales	public	ES	E&S. Escuela Superior S.L. Castellón	private	franchising/validation
UK	University of Wales	public	ES	Escuela Superior de Negocios, S.L. Castellón	private	franchising/validation
UK	University of Wales	public	ES	Escuela Superior de Informática y Negocios (CESINE)	private	franchising/validation
UK	University of Wales	public	ES	Escuela de Negocios CaixaVigo Pontevedra	private	franchising/validation

UK	University of Wales	public	ES	Centro Andaluz de Estudios Empresariales (C.E.A.D.E.) Sevilla	private	franchising/validation
UK	University of Wales	public	ES	Escuela Autónoma de Dirección de Empresas (E.A.D.E.) Pedregalejo – Málaga	private	franchising/validation
UK	University of Wales	public	ES	Escuela de la Empresa de Valencia (GIEM)	public	franchising/validation
UK	University of Wales	public	ES	Colegio Marcelo Spinola Sevilla	private	franchising/validation
UK	University of Wales	public	ES	EUNCET. Escola Universitària de Negocis de la Caixa d'Estalvis de Terrassa Barcelona	public	franchising/validation
UK	University of Wales	public	ES	Centro de Estudios Superiores de la Fundación San Valero - Zaragoza	private	franchising/validation
UK	University of Wales	public	ES	Centro de Estudios Superiores y Técnicos de Empresa (CESTE). Zaragoza	private	franchising/validation
UK	University of Wales	public	FI	ISO KIRJA COLLEGE, KEURUU	private	franchising/validation
UK	University of London	public	FR	University of London Institute in Paris	public	branch campus
UK	University of Wolverhampton	public	FR	Ecole Supérieure des Technologies Industrielles Avancées (ESTIA)		franchising/validation
UK	Open University	public	FR	ESC Rennes School of Business, France	private	franchising/validation
UK	University of Wales	public	FR	INSTITUT SUPERIEUR DE GESTION, PARIS	private	franchising/validation
UK	University of Wales, Newport	public	HU	Facultas Nonprofit Kft.	private	branch campus
UK	CECOS London College	private	HU	Galf Business School	public	franchising/validation
UK	University of Hertfordshire	public	HU	Számalk Rendszerház Rt.	private	franchising/validation
UK	Anglia Ruskin University, Cambridge & Chelmsford	public	HU	BBS Budapest Business School (Budapesti Gazdasági Főiskola)	public	franchising/validation
UK	Oxford Brookes University	public	HU	International Business School	private	franchising/validation
UK	Liverpool John Moores University	public	IE	Dublin Business School	private	franchising/validation
UK	University of Wales	public	IE	GALWAY BUSINESS SCHOOL	private	franchising/validation
UK	University of Wales	public	IE	DUBLIN BUSINESS SCHOOL	private	franchising/validation
UK	University of Wales	public	IE	INSTITUTE OF BUSINESS AND	private	franchising/validation

TECHNOLOGY						
UK	University of Wales	public	IE	IRISH BIBLE INSTITUTE, DUBLIN	private	franchising/validation
UK	University of Wales	public	IT	DOMUS ACADEMY, MILAN	private	franchising/validation
UK	University of Wales	public	IT	ISTITUTO SUPERIORE DI OSTEOPATIA, MILAN	private	franchising/validation
UK	University of Wales	public	IT	ACCADEMIA ITALIANA	private	franchising/validation
UK	University of Wales	public	IT	EUROPEAN UNION ACADEMY OF THEATRE AND CINEMA	private	franchising/validation
UK	University of Wales	public	IT	PENTECOSTAL FACULTY OF THEOLOGY AND RELIGIOUS STUDIES	private	franchising/validation
UK	University of London	public	MT	ST MARTINS INSTITUTE OF INFORMATION TECHNOLOGY	private	branch campus
UK	NCC Education, Manchester	private	MT	STC TRAINING	private	branch campus
UK	University of Sheffield	public	MT	ST CATHERINE'S HIGH SCHOOL HIGHER EDUCATION CENTRE	private	franchising/validation
UK	University of Greenwich	public	MT	FHRD TUITION CENTRE	private	franchising/validation
UK	University of Sunderland	public	MT	EIE INSTITUTE OF EDUCATION	private	franchising/validation
UK	Heriot Watt University	public	MT	MALTA INSTITUTE OF MANAGEMENT	private	franchising/validation
UK	Henley - University of Reading	public	MT	Henley Business School in Malta	private	franchising/validation
UK	Open University	public	NL	Utrecht School of the Arts, Netherlands	public	franchising/validation
UK	University of Wales	public	PL	LAZARSKI UNIVERSITY	private	franchising/validation
UK	University of Wales	public	RO	FUNDATIA PENTRU PROMOVAREA INVATAMANTULUI EUROPEAN (FINE)	private	franchising/validation
UK	University of Wales	public	SE	Skandinaviska Osteopathögskolan	private	franchising/validation
USA	Webster University	private	AT	Webster University Vienna	private	branch campus
USA	Kettering University Michigan	private	AT	Ingenium Education	private	franchising/validation
USA	Boston University	private	BE	Boston University in Brussel	private	branch campus
USA	City University of Seattle	private	BG	City University of Seattle in Bulgaria	private	branch campus
USA	University of Northern Virginia	private	CZ	University of Northern Virginia Prague	private	branch campus
USA	Empire State College	public	CZ	University of New York Prague	private	franchising/validation
USA	LaSalle University	private	CZ	University of New York Prague		franchising/validation

USA	State University of New York (SUNY)	public	CZ	University of New York Prague		franchising/validation
USA	Schiller International University	private	DE	Schiller International University Heidelberg	private	branch campus
USA	Touro College New York	private	DE	Touro College Berlin	private	branch campus
USA	Troy University	public	DE	Troy University Heidelberg	public	branch campus
USA	Purdue University	public	DE	GISMA Business School	private	franchising/validation
USA	University of Indianapolis	private	EL	University of Indianapolis, Athens Campus	private	branch campus
USA	UNIVERSITY OF INDIANAPOLIS	private	EL	UINDY ATHENS	private	branch campus
USA	City University of Seattle	private	EL	City Unity College	private	franchising/validation
USA	City University of Seattle	private	EL	The Technological Education Institute (T.E.I.) of Piraeus	public	franchising/validation
USA	State University of New York (SUNY)	public	EL	New York College Athens	private	franchising/validation
USA	Empire State College	public	EL	New York College Athens	private	franchising/validation
USA	Berklee College of Music	private	ES	Berklee College of Music Valencia Campus	private	branch campus
USA	Sacred Heart University	private	ES	Sacred Heart University US	private	branch campus
USA	Saint Louis University	private	ES	Saint Louis University Madrid	private	branch campus
USA	Schiller International University	private	ES	Schiller International University Madrid	private	branch campus
USA	Suffolk, University de Boston, Massachusetts	private	ES	Suffolk University, Madrid Campus	private	branch campus
USA	Broward Community College de Fort Lauderdale, Florida	public	ES	International College of Sevilla (I.C.S.) Sevilla	private	franchising/validation
USA	SUNY Empire State College	public	ES	Escuela Superior de Negocios S.L. (E.S.N.E.)	private	franchising/validation
USA	Tompkins Cortland Community College	public	ES	Escuela Superior de Negocios S.L. (E.S.N.E.)	private	franchising/validation
USA	University of South Carolina	public	ES	EUNCET. Escola Universitària de Negocis de la Caixa d'Estalvis de Terrassa Barcelona	public	franchising/validation

USA	Georgia Tech	public	FR	Georgia Tech-Lorraine	public	branch campus
USA	Parsons The New School for Design		FR	École Parson à Paris	private	branch campus
USA	Schiller International University	private	FR	Schiller International University Paris	private	branch campus
USA	Baruch College, City University of New York	public	FR	American Graduate School of Business and Economics	private	franchising/validation
USA	McDaniel College	private	HU	McDaniel College Budapest	private	branch campus
USA	Webster University	private	HU	Szent István University	public	franchising/validation
USA	Touro College New York	private	IT	Touro University Rome	private	branch campus
USA	John Hopkins University, Baltimore	private	IT	Bologna Center	private	franchising/validation
USA	University of Phoenix	private	NL	University of Phoenix Rotterdam	private	branch campus
USA	Webster University	private	NL	Webster University Leiden Campus	private	branch campus
USA	Clark University	private	PL	Clark University Poland	private	branch campus
USA	City University of Seattle	private	SK	City University of Seattle in Slovakia	private	branch campus
USA	American Intercontinental University	private	UK	AIU London	private	branch campus
USA	Duke University	private	UK	Duke Fuqua School of Business London	private	branch campus
USA	Hult International Business School	private	UK	Hult London Campus	private	branch campus
USA	University of Chicago Booth School	private	UK	Chicago Booth London	private	branch campus
USA	Webster University	private	UK	Regent's American College London	private	branch campus
ZA	University of South Africa	public	HU	Károli Gáspár University of The Reformed Church in Hungary	public	franchising/validation

ISBN 978-92-79-29741-0

