Code of Conduct for Cross-border Quality Assurance in the European Higher Education Area

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Introduction and purpose

The Code of Conduct promotes the ethical and responsible conduct of QA agencies engaged in cross-border quality assurance (CBQA) activities within the framework of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). CBQA is defined as external QA activities of a QA agency carried out in a country other than the one in which it is based or primarily operates.

The Code of Conduct has been developed to support QA agencies to conduct CBQA in a transparent, fair and context-sensitive manner, while upholding the ESG[1] and the EHEA Fundamental Values[2].

By articulating shared values and principles that are specifically relevant in a cross-border context, the Code of Conduct complements the Key Considerations for CBQA in the EHEA document. It provides a set of commitments for supporting the responsible and effective implementation of CBQA activities. Through this, it fosters consistency and mutual trust between higher education systems and supports the effective implementation of the ESG in diverse national contexts.

The two documents should be considered together when conducting CBQA.

The Code of Conduct does not impose mandatory requirements. QA agencies engaged in CBQA are encouraged to integrate it into their practices, and to demonstrate their self-compliance by signposting their commitment through appropriate channels. The Code of Conduct is a helpful resource for other stakeholders too, as many of the commitments are directly or indirectly relevant for them.

Scope

Although it is primarily designed for CBQA activities within the EHEA, the Code of Conduct may also provide a useful reference for ESG-aligned activities beyond the EHEA. It recognises that CBQA takes place within a broader global landscape and reflects the growing interest of international higher education institutions in aligning their practices with the ESG. The Code of Conduct also builds upon internationally recognised principles for CBQA provisions, such as the UNESCO-OECD Guidelines for quality provision in cross-border higher education (2005)[3].The Code of Conduct seeks to support cooperation across regional quality assurance frameworks. The primary audience of the Code of Conduct is QA agencies conducting QA activities in another country.

[1] See Introduction of the ESG (specify here the 2027 edition with a hyperlink).
[2] See the website of the Fundamental Values in European Higher Education Area: https://fundamentalvalues.info/
[3] See here: https://unesdoc.unesco.org/ark:/48223/pf0000143349

In conducting CBQA activities, agencies must first refer to the ESG; the Code of Conduct builds upon the ESG and the Key Considerations for Cross-Border Quality Assurance in the European Higher Education Area.

Values

The Code of Conduct is built on the principles underpinning the ESG, and reflects the EHEA fundamental values. It respects national regulatory frameworks and the diversity of higher education contexts within and beyond the EHEA.

QA agencies must remain aware that institutions in other countries may operate according to different institutional practices, governance traditions, educational cultures and organisational arrangements reflecting values, beliefs, behaviours and practices that differ from those familiar within the agency's own context. Without this awareness, there is a risk that legitimate local practices may be misinterpreted because they differ from the norms or assumptions familiar to the QA agency. However, contextual sensitivity does not override the ESG or the EHEA Fundamental Values which provide a common reference point for external quality assurance in the EHEA.

These EHEA values should inform the professional conduct of agencies and peer-reviewers engaged in CBQA activities, supporting fair, transparent, and context-sensitive CBQA.

Principles

1. Legitimacy and compliance

Principle: The agency has a legal basis to operate abroad. It complies with the legal and regulatory frameworks of the host country and exercises due diligence to ensure it is engaging with legitimately established higher education institutions.

2. Contextualisation and fitness for purpose

Principle: The agency takes into account the cultural and educational context of the host country, ensuring that the methodology and procedures are fit for purpose and aligned to the ESG from the application phase to the follow-up. The agency guarantees that the recommendations provided in the external review report are context-sensitive and fit for purpose.

3. Integrity, consistency, fairness and professionalism

Principle: The agency conducts CBQA activities with integrity, applying fair and consistent approaches that build trust among stakeholders and support accountability and quality enhancement.

The agency ensures the sustainable and responsible management of resources.

The agency ensures that staff and experts engaged in CBQA are appropriately trained and possess the relevant professional experience and intercultural awareness necessary to operate effectively in diverse international contexts.

4. Transparency and clear communication

Principle: The agency conducts CBQA processes that are transparent and accountable towards its stakeholders and the public. The agency ensures that the scope and purpose of CBQA activities - whether voluntary additional processes or processes intended to fulfil national quality assurance requirements - are clearly defined and communicated.

Regarding CBQA outcomes, the agency clearly defines and communicates their status, scope, and possible use, including any limitations regarding recognition or regulatory implications in the host country.

5. Cooperation

Principle: the QA agency establishes appropriate procedures ensuring that relevant public authorities and QA agencies in host country are informed of their CBQA cross-border quality assurance activities and to cooperate with them, where appropriate, to ensure the smooth implementation of the CBQA procedure. Where joint reviews are undertaken, the participating agencies ensure effective coordination, clear allocation of roles and responsibilities, timely exchange of information, and a coherent process that enhances efficiency and mutual learning.

Correspondence between the Principles of the Code of Conduct and the sections of the Key Considerations

The practical application of the principles is outlined in the following sections of the Key Considerations.

Code of Conduct	Key Considerations
Principle 1 - Legitimacy and compliance	A1 - Rationale A2 - Legal Framework and requirements B1 - Cooperation and getting to know the context
Principle 2 - Contextualisation and fitness for purpose	B2 - Modifications of procedures C1 - Alignment with local norms C4 - Complaints and appeals C5 - Follow-up
Principle 3 - Integrity, consistency, fairness and professionalism	A2 - Legal Framework and requirements B3 - Selection and training of peer-reviewers B5 - Practical arrangements
Principle 4 - Transparency and clear communication	B4 - Communication with stakeholders and the wider public C2 - Transparency C3 - Recognition of the decision
Principle 5 - Cooperation	A3 - Joint reviews B1 - Cooperation and getting to know the context