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Conclusions

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'Plus ça change, plus c'est la même chose!'

'Mammon, the demon of wealth and greed is very fast replacing the Indian goddess Lakshmi'

'It does not matter the direction of the wind if you do not know where you are going'

In October 2014, an international conference on "Higher Education as Commerce: Cross-Border Higher Education and the Services Directive" has been jointly organised by A3ES – the Portuguese Agency for Assessment and Accreditation of Higher Education – and CIPES – Centre for Research in Higher Education Policies, in Oporto, with the basic idea of discussing Cross-Border Higher Education (CBHE) dimensions, the issues it poses for nation-state systems of higher education and its associated potential, including the phenomenon of massive open online courses (MOOCs). The consequences following from the EU Services Directive, the measures national quality assurance agencies are (or are not) envisaging to ensure an acceptable balance between the interpretation of higher education as a tradable service against its abiding mission to advance knowledge, to raise the educational level of the nation's citizens, to sustain its innovative capacity and to uphold its social cohesion were all themes under debate during the three days of the conference. Experts from different countries and areas of expertise have presented and discussed different perspectives on the theme, exploring approaches that go from sceptical to evangelist ones. This book is the final product of the conference, each chapter being a contribution for the debate on CBHE. In this final chapter, we intend to offer overall conclusions regarding the topics covered in the different chapters, and in addition providing some avenues for future debate, by

pointing out some of the benefits and threats the way ahead may bring. Although most presenters argued that this is not a totally new topic for higher education – *'plus ça change, plus c'ést la même chose'* – it became clear from the discussions that something new might be emerging in the higher education scene after all.

Cross-Border Higher Education: concepts, modes of delivery and MOOCs

Universities have always been regarded as one of society's most international institutions. As Amaral argued in his chapter, "Universities have internationalisation in their genes since their very early foundation". Also Neave claimed that a number of the issues raised were not entirely new, albeit they remerged in new contexts. It just seems that there is an incessant terminological juggling to actually put very "old wine in new bottles". These new bottles are needed because, over the last three decades, international activities have dramatically expanded in volume, scope and complexity. Some settings, as Salmi and Tavares highlighted, have positively contributed to this expansion: the introduction of a market and trade approach to international education; an increased demand for tertiary education (especially the unmet demand from first-time, adult and changing career students); the renewed emphasis on education mobility; the great advance in the use of information and communication technologies for education delivery; favourable higher education laws; the capacity to build partnerships in countries willing to expand private higher education; the use of English as an international language; and national e-learning policies.

International activities range from traditional faculty exchanges and study-abroad programmes to new forms of education provision for foreign students, which are known as transnational, borderless or Cross-Border Higher Education. Although often used interchangeably, these terms hide some subtle conceptual differences, which are related with these new developments of higher education. The term *borderless* "refers to the blurring of conceptual, disciplinary, and geographic borders traditionally inherent to higher education" (Knight, 2003, p. 2), suggesting the dissipation of borders in a

situation of exceptional advance in distance and e-learning education. As these new forms of education provision have risen, so have concerns with quality, accreditation and funding, which reinforce the importance of borders. The term *cross-border* seems precisely to emphasise the existence of those borders, which are deemed to be relevant in a context of regulatory frameworks, the focus of this book.

Although far from a unanimous definition, and despite the exclusion from the definition of CBHE of e-learning provided in a purely distance mode, as it is the case of some national authorities such as the Australian, the concept is broadly defined as "higher education that takes place in situations where the teacher, student, programme, institution/ provider or course materials cross national jurisdictional borders. CBHE may include higher education by public/ private and not-for-profit/ for-profit providers. It encompasses a wide range of modalities, in a continuum from face-to-face (taking various forms such as students travelling abroad and campuses abroad) to distance learning (using a range of technologies and including e-learning)" (UNESCO/ OECD, 2005). This definition includes the two main CBHE providers mentioned in Salmi and Tavares' chapter: the traditional higher education institutions that are usually oriented to teaching, research and service to society (containing public non-profit, private non-profit and private for-profit institutions); and the "new or alternative providers" that primarily focus on teaching and the delivery of education services (usually companies or organisations that provide education programs and/ or services with for-profit purposes, commercial education, corporate universities, professional, governmental and non-governmental organisations, virtual universities as well as other sorts of organisations, including rogue or low quality providers). This means that beyond the traditional face-to-face interactive mode, education can also be delivered at a distance, in a virtual (synchronous and asynchronous), and in a mixed mode. CBHE is therefore a global, expanding phenomenon that can cover several forms of education provision: double/ joint programmes, offshore campuses, networks, mergers, virtual education and many others that are still in an expansion and development stage.

In fact, it became clear with Ferreira and Eaton's chapters that new challenges are being posed to higher education systems all over the world through the introduction of new information and communication technologies (ICT). Some of the signs of this new technological environment can be found in relatively new modes of education delivery, including blended learning, digital content, open educational resources and Massive Open Online Courses (MOOCs). In this book a special emphasis has been given precisely to MOOCs, described as a "disruptive innovation", which reaches millions of students who mostly, so far, did not need to pay a cent. As a relatively recent online learning phenomenon, MOOCs are becoming of significant interest for higher education institutions and venture capitalists that see it as a new business opportunity. The business model, as Ferreira argued, is still evolving, but the rule is that registration is free, while certification is normally available as a paid service. While MOOCs share the main advantages of other types of distance education providers, such as flexibility of carrying out activities at any time, from any place with an Internet access, the participants are not free to progress at their own pace, as occasionally happens in other distance education scenarios. Additionally, the lack of personalised support, the eventual blurring of cultural diversity, the potential to attract dishonest academic options, the reduced peer interaction limited to electronic communication, and the accreditation difficulties were reported as some of the threats affecting MOOCs. Although MOOCs are still in an early stage as a mainstream educational resource, it became clear that this form of online courses are here to stay, as it has already made a substantial contribution to democratise access to informal education in all parts of the world where Internet access is available. Being already an important form of online course delivery, MOOCs will become increasingly important as their academic recognition enlarges. Their implications, as Ferreira highlighted, can be anticipated in the near term with the change of pedagogical paradigms, e.g. in the form of flipped classroom scenarios, but also in the medium to longer term, with respect to the HE academic profession and economic landscape. Producing MOOCs requires the need of

a new species of 'professional staff'. Therefore, as Neave argued, MOOCs appear to usher in a further round in re-defining the boundaries, not just between historic nations but also between academic and administrative labour.

MOOCs are therefore an interesting new development, which at its best could contribute to more social engagement, greatest quality for greatest number of students, broadening access and knowledge and allowing higher education attendance by a large number of students at low unit costs. However, as with other modes of CBHE, there is heterogeneity in the field. To be made properly it is probably a costly enterprise, which raises doubts about the sustainability of their business model.

Higher Education as a Tradable Commodity and Commercial Activity: the GATS agreement and the Services Directive

In a context of global competition, knowledge has been assumed as a prime factor for economic growth. Internationalisation of higher education has therefore been increasingly driven by market orientations and the economic rationale has gained prominence over the political, academic and cultural rationales. The prominence of the economic rationale can be found in the neo-liberal ideologies which have advocated the elimination of national barriers to allow for an open market and international trade. These neo-liberal ideologies tend to nurture a shift from the paradigm of higher education as a social and cultural right or as a public good to a paradigm that emphasises economic returns, whereby institutions become service providers and students become consumers of a commodity.

Some steps towards greater commercialisation of education are taking place alongside the fiscal pressure on the welfare state. Under the argument that free trade would subsidise the intellectual progress of mankind, a first step has been the attempt to liberalise education services through the General Agreement on Trade and Services (GATS), under the framework of the World Trade Organization (WTO). A specific proposal to the WTO, to consider education as a tradable service or a commodity to be

included in the GATS, was spearheaded by the United States. Governments of industrialised countries have keenly sought to make the most of a growing national and international market of education, which has steadily been acknowledged as a lucrative service industry and export commodity.

A second step to liberalise education services, in the European context, occurred when the European Parliament and the Council of the European Union passed the Directive 2006/123/EC, on services in the internal market – the Services Directive (European Union, 2006). As was stated by Amaral, the Directive aimed to create an EU internal market in services by removing barriers and determining that a provider from member state A is allowed to offer its services in member state B as long as it complies with the regulatory framework of member state A, where the provider is registered. The Services Directive, although explicitly excluding areas such as health, environment, public health, and security, is not clear about whether it includes or not education services. Education could fall both under the excluded category of "Services of General Interest" (SGI), or under the included category of "Services of General Economic Interest" (SGEI). Member States are entrusted by the Directive to define their national application of the categories SGI/SGEI as long as they comply with Community law. Final decisions are made by the European Court of Justice.

This means that the European education policies are surrounded by uncertainty, opening up possibilities for different interpretations. The interpretation of the Commission has considered that private provision of education falls under SGEI. For this reason, if a private institution operates in a foreign member state, the host member state not only cannot forbid franchising operations, but also cannot determine the accreditation of the provided programmes by its national agency. That responsibility lies with the exporting member state. Nevertheless, as Bischof stated, little data exists about CBHE activities in Europe, and it is not clear how exporting member states deal with the responsibility of assuring the quality of the HEIs/ programmes that are being offered in foreign member states.

The Services Directive, because of its ambiguity, has generated some controversy. In this book, while some potential benefits were recognised, some critical views also raised major problems related with the implementation of the Services Directive. De Groof argued in favour of the benefits resulting from the Services Directive, namely no barriers, no obstacles, trust, convergence, integration of the labour market, mobility, readability, transparency, comparability, and non-discrimination. Also Berlinguer, in his chapter, saw the Services Directive as an important step to build a truly European internal market, and as a way to build a European academic area, without questioning national sovereignty. Arguing that national-state fragmentation has been a serious obstacle to the development of European science and education in the face of global competition, the author considers that the Directive is beneficial as it might encourage to go beyond the obsolete and egoistic vision of intellectuals who consider culture and education their own realm, detached from reality. Assuming that competition might stimulate quality, Berlinguer considers a mistake to go back to an old idealistic concept of knowledge, closed and jealous of its past. The main problem is not the Services Directive in itself but the Bologna Process, which unfortunately is ongoing at an extremely slow pace. Bologna should then overcome nationalistic resistance to offer young people a common European qualification, and a common labour market, with wider employment opportunities for skilled labour.

However, the same authors have also pointed out some of the potential risks of the Services Directive. De Groof, in his chapter, has highlighted some of the contradictions that the implementation of the Services Directive on CBHE raises: the national versus the international character of education; the fact that education is both public and private, a service and a good; the fact that education appears either as a responsibility of the state, and also as belonging to the market, interpolating the 'third sector' – in particular civil society; and the double character of education as a cultural good and as something with economic significance. Berlinguer also recognises that there is a risk of subjugation, exploitation, and control of culture by private interests that may hinder

citizens' rights. To defend the receivers of services, the basic instrument is quality assurance, which is a prerequisite for mutual trust and recognition. However, mutual recognition is yet difficult to achieve. There are still some gaps to overcome in order to achieve mutual recognition: differences in the process and criteria of recognition of qualifications among quality assurance agencies; international standards versus local standards; and the emergence of some rogue agencies. If different agencies assess different things (institutions or programmes), if some agencies have different status (independent or dependent from their governments), if the process of recognition is either bilateral or multilateral, mutual recognition appears more ideal than real. If different member states, in their sovereignty, have different quality assurance systems which operate under different standards, or respond to different national needs, the quality certificates issued by the agencies of the exporting country might not respond to the host country needs, expectations, standards or legal framework. Mutual trust requires, therefore, homogeneity and uniformity of standards.

As Bischof alerted, CBHE providers tend to look for places with favourable economic and structural conditions (typically capital cities), weakly regulated, and therefore they do not tend to foster either more equitable access to higher education, or equity between regions. Moreover, while around one third of member states have in place quite strict requirements regarding the control of foreign providers operating in their territory, one quarter does not have any regulation in place. Yet, the level of regulation and the amount of CBHE activity in receiving countries appears to have a rather weak relationship. Therefore, Bischof suggested that regulation has little effect and that even strict regulatory frameworks cannot prevent CBHE providers from operating where there is a good "market" for their educational product. Taking into account that most countries rely on the accreditation procedures of others, Bischof considered that it is a moot point to know the extent to which this is a sign of trust as much as a convenience. Bischof concluded that as long as transparency tools for registration of incoming providers did not exist, rogue providers would have leeway to exploit. However, the

author believed that the already existing European infrastructures – the ENIC/NARICs, The European Register for Quality Assurance (EQAR) or initiatives such as Qrossroads, hold promising potential to build further cooperation.

Also very critical about the Services Directive, Amaral concluded stating that the European Union has gone much further than the WTO/GATS in the liberalisation of trade in education services. The Services Directive is not following the recommendations of international organisations such as UNESCO and OECD, and even of the World Bank. It seems, however, that the European Commission has recently recognised that there has been too much intrusion in an area protected by subsidiarity. In its recent report on quality (European Commission, 2014), the European Commission suggested the possibility of bilateral agreements authorising the QA agency in the receiving country to perform on behalf of the sending country QA agency. It is yet to be seen how far the European Commission is prepared to go to eliminate the ambiguity of the Services Directive.

It seems therefore that CBHE is somehow caught in between two contradictory pressures: internationalisation (a commitment to advancing universal knowledge) and nationalisation (a commitment to the local interests of nation states). These opposing pressures are difficult to reconcile especially when CBHE is seen as commerce, giving increasing rise to the economic rationale, attracting capital investment and profit. The for-profit character of CBHE has triggered regulatory mechanisms to protect the interests of nation states and its citizens, preventing fraudulent practices. But much more needs to be done.

A fair market would require a level playing ground for competition. The Services Directive, aiming to build a truly European market, assumes that each nation has similar priorities and features, which, in fact, is not the case. Each European country has its own social and economic features, regulatory mechanisms and purposes. For instance, a country with a strictly regulated higher education system might look suspiciously for CBHE provision either because it collides with national interests, or

because there is a lack of trust in the quality assurance system of the providers. As Noorda (2015) alerted, higher education is very national in terms of legal prescriptions, finances, quality assurance, academic calendars, professional qualification specificities, academic culture, etc. The paradox is that even when higher education systems and their institutions want to be international, it is expected that they are in full agreement with their local and national preferences and tastes. As Sursock mentioned in her chapter, although internationalisation is rising in importance, it is fair to say that institutions still tend to serve mainly their regional and national communities, even when engaging in European or international activities.

These different nation states' features and purposes, as well as lack of trust, might lead the Services Directive to fail its purpose. Moreover, the Services Directive, establishing that the responsibility for the quality assurance of programmes lies with the exporting member state, rather than with the receiving country, is apparently becoming the *visible* hand of liberalisation.

Cross-Border Higher Education Actual Experiences

As already stated in this concluding chapter, there are a significant number of different types of CBHE, ranging from the traditional forms of students and academic mobility between different countries to more recent approaches that essentially rely on the mobility of programmes or providers, such as branch campuses, franchising activities and validation agreements. The first group of CBHE types of activities exists since the university exists as an institution (see Neave's and Amaral's chapters), while the second group has spread quite rapidly only in recent years, admittedly very much under the promotion of the EU single market and the development of a suitable regulatory framework for it, namely the Services directive and the possibility of considering education a service of general economic interest. The economic crisis affecting Europe in the recent years has also promoted CBHE activities as a way of searching for new financing streams (see Walsh's chapter).

But what is the real situation regarding CBHE in Europe? In his chapter, Bischof presents an overview of the types of activities that are actually taking place, although referring that so far little data exists to adequately support a deep and effective analysis of the situation. Even though, it is apparent from the existent data that the major exporters of higher education to countries all over Europe, on a world-wide scale, are by far the UK and the US, with franchising agreements being used by the vast majority of UK exporters. Furthermore, European exporters are not only from capital cities, but CBHE is found to occur primarily in capital cities. The vast majority of exporting institutions are large and public, while the majority of receiving CBHE activity occurs at small, privately funded institutions. Interestingly, the countries with more students looking for higher education abroad – as it is the case of Greece – are also the ones receiving more CBHE activities (higher numbers of CBHE activities were found in Spain and Greece).

In the face of the CBHE diversity reported in Bischof's chapter, it is not surprising that the chapters by Jackson and Hackl address quite different situations for CBHE in the United Kingdom and Austria, respectively. The UK has a long track record of exporting higher education with a significant number of activities occurring at this level, including in-bound CBHE, transnational education and international partnerships. UK transnational education assumes a much larger scale than in-bound CBHE, with 78% of higher education institutions having some form of it. According to Jackson's chapter the main concern is now linked to the development of mechanisms to effectively assure the quality of these activities, in order to protect the UK higher education reputation and brand.

Perhaps on the opposite side of CBHE development in Europe, Austria emerges as a country where these types of higher education activities are still essentially about students and academics mobility, mainly under the framework of European programmes such as Erasmus. Although being an internationalised country in terms of academic staff and having a long tradition of receiving foreign students, it does not

seem to be – at least yet – a significant market actor in CBHE, nor does it seem to have been much influenced by CBHE in its neo-liberal connotation (see Hackl's chapter). Austrian governments do not seem to be worried with either GATS or the Services Directive, since no formal actions have been taken in relation to both so far. But the future may well bring new developments in terms of programmes and institutions mobility (both inwards and outwards). According to Hackl, the recent higher education legislation, inspired by New Public Management, favours higher education institutions' autonomy, which in turn allows institutions to offer programmes abroad. For the moment, and besides academic and student mobility, CBHE activities are reduced to foreign institutions operating in Austria, which can be registered, although without a formal recognition of their courses and degrees, and to some – although very few – Austrian higher education institutions that have established joint study programmes in cooperation with foreign institutions.

Stakeholders' Views on Cross-Border Higher Education

Higher education institutions and their students are quite relevant stakeholders for higher education, and as such it is of utmost importance to understand what their views on CBHE are. The chapters by Martins and Sursock present an overview of how they see the development of CBHE activities, both in terms of potential gains and benefits and of drawbacks, problems and challenges for higher education.

The students' view on CBHE and its implications essentially translates these stakeholders' concern with the role higher education should pay in the construction of equitable and democratic societies. As they see it, there is the real danger that the rise of CBHE will bring with it other developments, such as the use of education as a potential market, the inclusion of education in trade agreements, the promotion of cost-sharing practices and the growth of private funding in line with the reduction of public investment, which will endanger the social benefits education may bring, contributing to worldwide inequalities and negatively affecting both actual and prospective students.

Three basic types of concerns are put forward by students: i) the economisation of higher the education content; ii) the economisation of education to create a market of educational services; and iii) the economisation of educational institutions, with implications for their governance and management.

CBHE is seen by students as having potential real benefits but also encompassing significant dangers. If carefully implemented, CBHE can effectively contribute to the development of societies, by helping to solve some of the challenges derived from an increasing demand for higher education; it is also an asset for international cooperation and allows for the development of more flexible ways of learning. On the negative side, it may tend to commodify higher education, leading to inequalities, difficulties in students' access, a decline in underrepresented groups' participation, lack of justice and social development. Furthermore, students refer to the questionable quality of some providers (allied to difficulties in recognising low quality cases), dangers in terms of higher education systems' development in transition and developing countries (widening the gaps between regions and nations), the assumption of students as mere consumers and the idea of education only for market needs (assuming an utilitarian perspective) as other negative aspects that CBHE may promote.

Sursock's chapter gives an account of how European universities and other types of higher education institutions approach internationalisation, namely in terms of the type of activities developed and how important they are in relation to other strategic priorities; from that account, future trends are anticipated. Internationalisation seems to be in the top three priority areas for higher education institutions, together with quality assurance and Bologna degree structures, which may indeed be a consequence of the changing European and global political and economic contexts.

The recent economic crisis combined with the demographic downturn resulted in pressures – also from governments – to use internationalisation and CBHE as a source of income generation both for institutions and national economies (see Amaral, Sursock and Walsh chapters). As stated by Amaral in his chapter, less governmental

funds have led higher education institutions to look for additional sources of funding: competition for students is a reality and higher numbers of students may be enrolled through an increasing percentage of international ones, which tend to pay significant higher fees when coming from non-EU countries. Other options are the development of CBHE activities and, as referred by Sursock, we can witness aspiring global players preparing to develop and enhance their international outreach, including through the establishment of offshore campuses.

In terms of internationalisation priorities, institutions tend to refer the attraction of more international students, research and teaching internationalisation and the offer of more opportunities for their students to go abroad. Aspects such as the development of MOOCs and other types of e-learning programmes, capacity building, offshore campuses and the teaching of programmes in languages other than English collect much less support in terms of being considered priority areas for institutions' internationalisation. It seems that for European higher education institutions, CBHE is by far much more linked to academic and students' mobility – the traditional view of it – than with programmes or providers mobility.

For institutions (see Sursock's chapter), competition and cooperation will increase in the upcoming years, which may explain why they identify quality assurance (understood as internal and external quality accountability processes) as the most important development, placing it consistently during the past eight years, along with internationalisation, as one of their strategic priorities. It may also explain why rankings and league tables are increasingly being thought of as important issues regarding higher education development.

How to Assure Quality in Cross-Border Higher Education?

This is a book on CBHE and quality assurance and indeed all chapters addressed, to a certain extent, the need to assure quality in CBHE, even if not touching the topic directly. CBHE seems to create a significant number of challenges, one of the most

relevant being how to guarantee that higher education programmes offered by a foreign institution really accomplish the quality standards established for home institutions. The fact that the Services Directive does not explicitly exclude education increases the burden since it leads, as already mentioned, to a situation where foreign institutions cannot be forbidden of operation by the host country nor can their programmes be subject to accreditation by the national agency. In this context, how to assure quality in CBHE? How can a receiving country protect itself and its nationals from low quality provision, degree mills and rogue providers?

The European Treaty (TFEU, 2012) establishes the free movement of services within Europe, including the freedom of establishment and the freedom to provide services. But, as stated by De Groof in his chapter, there is still a significant gap between what is written and the reality, with the EU still far from being a truly free market. A balance is needed between national responsibilities and the European principles regarding the establishment of one single market.

Amaral's chapter alerts for the existence of a clear opposition between the idea that national governments should resort to external quality assurance to guarantee that their higher education systems have a certain quality level, and the idea of a free movement of services, including of education, as established under the Services Directive.

As referred in many chapters of this book, higher education institutions have definitely entered an area of commercial activity, namely at the level of international trade. According to De Groof (see his chapter) even public universities tend to act as private companies in some respects, namely when commercialising services or searching for private funding. But are they actually prepared to do this? How do they assure the quality of the programmes they offer abroad? Using markets as regulators can be problematic (Sheeny, 2010, p. 67); consumer protection and regulation is needed both in importing and exporting countries, be it licencing, accreditation or other mechanisms (Sursock, 2001; Knight, 2002; Tilak, 2011).

In this respect, and according to the study presented in Bischof's chapter, one can say that the situation in Europe at the level of receiving countries is quite diversified, ranging from no regulations at all to requiring that foreign providers will go through the accreditation procedures existent in the country. Exporting countries rarely seem to impose heavy restrictions on the exporting activities of their higher education institutions, even if they actually are responsible for the quality of the degree programmes and awards they offer and grant in other countries (including other European member states). Some examples from the UK and Australia (see Jackson's and Amaral's chapters) illustrate quite clearly the fact that the quality assurance schemes and regulations existent in exporting countries do not seem to be sufficiently efficient to eliminate cases of bad quality provision abroad.

UK and Ireland emerge in this book as countries having some dispositions and regulations regarding CBHE. In Ireland (see Walsh's chapter) the QQI (Quality and Qualifications Ireland) acts as an external quality assurance agency; it validates programmes for private higher education institutions that choose QQI as their awarding body and it is also the agency responsible for the quality assurance of the Irish higher education export. Quality audits of Irish public universities include an examination of their CBHE activities where institutions have to demonstrate that they effectively assure the quality of their 'linked providers', meaning those institutions that offer degree programmes and award degrees. Universities have to provide QQI with an annual institutional report on their 'linked providers' that is published by the institution. These reports tend to be useful also for the country since they provide an account of the Irish situation as an exporting country in terms of CBHE activities. In the case of quality assurance of higher education imported into Ireland, mostly from the UK, QQI has established an 'International Quality Mark – IEM', which is awarded to international providers who comply with a code of practice (this mark was developed as a consequence of concerns regarding college falsifying attendance records for students who were in fact economic migrants rather than true students).

In the UK (see Jackson's chapter), the Quality Assurance Agency (QAA) assures the quality of all UK programmes, especially those offered in partnership with other organisations and those delivered in other countries through CBHE provision. The outcomes from the reviews of overseas audits used to be a collection of reports on each of the partnerships; however, more recently, the main output is a country report, which details the range of UK provision and identifies good practices and recommendations for enhancement. Collectively, those reports are seen as useful references for good practices and improvement areas.

The 2014 European Commission report on quality suggests the possibility of bilateral agreements between quality assurance agencies, mandating the receiving country's agency to act on behalf of the sending country's one. And this does not seem to create problems regarding the Services Directive's dispositions. This calls for cooperation among agencies and may indeed be the way forward to deal with higher education institutions and programmes' quality assurance across borders, which is an issue put forward by many of this book's chapters (Amaral, de Groof, Walsh, Jackson).

In general, the authors defended that the responsibility for CBHE quality assurance should probably lie in coordinated and shared responsibilities of national authorities and national quality assurance agencies of both the importing and the exporting countries, the receiving institutions even of some supranational organisations such as ENQA. This would imply a need for concertation between national and supranational actions. Jackson's chapter refers that in the future it is likely that there will be a move towards greater cooperation and mutual recognition between international agencies. Agencies have developed their methodologies and approaches to quality assurance within the context of national expectations or legislation. With the development of a genuine global market for quality assurance services there is likely to be a greater degree of commonality of method and for the use of widely accepted reference points such as the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The case of Ireland (see Walsh's chapter) illustrates an

example of the collaboration between agencies to promote quality assurance across the wider European higher education area. The two agencies meet on a bi-annual basis and have signed a Memorandum of Understanding. Walsh refers to this cooperation as a way to help overcome the fears and negative aspects posed by the Services Directive. And even the European Commission has shown some openness to cooperation between the agencies of exporting and receiving countries.

ENQA is actually leading a European project entitled 'Quality Assurance of Cross-border Higher Education' (QACHE, 2015). The project is "…looking closely into different ways in which European quality assurance agencies and higher education institutions address the accreditation and quality assurance of programmes delivered outside their countries". The project intends to provide quality assurance agencies and higher education institutions with guidance for activities of internal and external quality assurance processes of CBHE, with support in establishing procedures for CBHE, as well as with comprehensive information on common approaches on quality assurance of CBHE. Based on good practices from Europe, Australia, Asia-Pacific and the Gulf Region, the project elaborates basic principles for a common approach to quality assurance of European CBHE enabling higher education to be of comparable quality and meet the same standards within or outside Europe and being recognised in the host country without facing double procedures (QACHE, 2015). Other joint projects between agencies are being run, as well as the setting up of networks and jointly conducted reviews (see Hopbach's chapter), which seems to indicate that indeed collaboration in the field of quality assurance is becoming a reality, even if not specifically in terms of CBHE.

The guidelines for quality provision of CBHE established by the OECD/UNESCO may be a useful roadmap to be used by European governments, higher education institutions and quality assurance agencies in their cooperation efforts. These guidelines, discussed in detail in Hopbach's chapter, are divided in recommendations for governments (in terms of national responsibility and international cooperation),

higher education institutions (quality abroad should be comparable with quality at home and the receiving country quality assurance system should be respected) and quality assurance agencies (CBHE and collaboration between sending and receiving bodies should be under the remit of their duties and mission). The guidelines stay at the level of the principles and do not detail the specific actions to be taken by all these actors. They underline the need for national responsibility and the international collaboration of parties, reinforcing the importance of mutual trust between governments, institutions and agencies for the mutual recognition of diplomas. In order to be more effective they need to be translated into documents that give guidance to the practical work on the 'shopfloor'. Furthermore, regional and inter-regional collaboration is of paramount importance in order to achieve the aim of a common understanding of the specific nature of CBHE among all parties involved (see Hopbach's chapter at this respect). At the level of quality assurance, CBHE needs not only to be part of the external but also of the internal systems. So cooperation between agencies is needed to externally assure the quality of CBHE in both the receiving and the sending country, but it is also necessary to include CBHE in the institutions' quality assurance systems. Hopbach refers that higher education institutions' internal quality assurance systems should cover all CBHE activities being developed, turning the information about it public and accessible for prospective students and other stakeholders in the country of provision.

Cross-Border Higher Education: The Way Ahead

It seems that there are many shades of CBHE and that the phenomenon is here to stay. Some see higher education as commerce; others see it as something more than a commodity. It is obvious that there is a significant economic impact of education, as well as a contribution to social development, and that internationalisation is a major concern of HEIs. However, internationalisation is a means to an end and not an end by itself (Noorda, 2015). Internationalisation is not a separate task or domain of higher education but a qualifier of the core tasks of the university, which include teaching and

learning, research and the third mission. The attempt to quantify outcomes as key performance indicators may serve accountability requirements, but they do not capture the intangible performances of students, faculty, researchers, and the community resulting from internationalisation (Noorda, 2015).

CBHE has many potential benefits worldwide, both for importers and exporters. For importers, mainly developing countries, CBHE might, in principle, widen the learning opportunities through the provision of more choices for citizens, address skills gaps, further global citizenship, improve quality of local institutions through increased competition, challenge traditional higher education systems by bringing innovative approaches and methods, increase the relevance of qualifications for a global labour market and benefit domestic institutions which connect with prestigious foreign institutions (Bashir, 2007; Adam, 2001). For exporters, CBHE represents essentially a great opportunity to access new sources of revenue (Adam, 2001), as it was shown in Salmi and Tavares' chapter. CBHE might also make European higher education more competitive (Adam, 2001), one of the Bologna process's core aims.

However, many risks and threats related with CBHE have been identified. Indeed, most of the potential benefits for developing countries end up being more theoretical than real. Concerns about CBHE provision in developing countries include negative effects of competition on domestic higher education institutions, influx of low quality foreign providers, worsening inequality in access to higher education and unequal access to higher education markets (Bashir, 2007). CBHE also raises problems associated with non-official and unregulated providers (often franchise institutions and branch campuses) who remain outside official national quality assurance regimes and are not subject to internal or external audit/ monitoring processes; problems associated with consumer protection; difficulties with 'degree mills' and bogus institutions that might exploit the public; unfair competition for strictly regulated domestic institutions and subsequent loss of income; lack of information that makes it difficult to distinguish the good quality from the poor quality CBHE institutions.

While the lead exporting countries argue that the cross-border educational services should be liberalised and tradable, not all the systems are as open to receive foreign providers as they are to encourage other systems to open their borders to receive their own institutions. The importing countries (mostly developing countries) fear losing sovereignty in an area of national sensitivity (Gornitzka, 2009). Therefore, there is a risk of a neo-colonialism of developing countries, which might lead to the suspicion that CBHE might be a form of cultural imperialism, given the probability of Western models of education to become the global standard (Edwards and Edwards, 2001). Global perspectives run the risk of being an imperialistic stance of international education, according to which 'one-size-fits-all' models are sold to 'knowledge markets' without taking into consideration the cultural needs and sensibilities of the communities within those markets (Patrick, 1997). In fact, as Achim's chapter has highlighted, cultural traditions in education and science matter. Even a high quality standard programme in the home country might not work in a different context, with different students. However, while cultural differences and identities should be preserved, others might be challenged, especially in those cases where, for instance, equity between male and female students is still far from being a reality.

In all respects, what seems consensual is that quality assurance for all these new types of CBHE provision is needed. This will probably entail more collaboration between quality assurance agencies, and enforcement of global guidelines for assuring the quality of CBHE. But, at the same time, one should not overemphasise international accreditation, assuming that the more international accreditation stars an institution has, the more internationalized it is and ergo the better it is (Knight, 2011). This corresponds to what Knight designated the *myth of international accreditation*. According to her, "foreign recognition of quality does not speak to the scope, scale, or value of international activities related to teaching/learning, research, and service to society either through public engagement or private enterprise" (Knight, 2011, p.15).

Current shortcomings were identified by ENQA, in its recent project entitled "Quality Assurance of Cross-border Higher Education" (ENQA, 2015): a trust gap between home and host countries about the quality of CBHE; lack of cooperation in the quality assurance of CBHE; and a lack of information. Strengthening inter-agency cooperation is seen as the way forward in the promotion of mutual understanding, the sharing of information or good practices and the building of trust. It is also recognised that it is essential to explore ways for agencies to work together. The shared goal is to facilitate the provision of quality CBHE, avoid regulatory gaps, and unnecessary discrepancies and duplication, in the ultimate interest of higher education providers and students. As a result of that ENQA's project, a toolkit (ENQA, 2015) was proposed offering practical guidance on:

- information sharing: how quality assurance agencies (QAAs) can improve the sharing of information on CBHE;

- cooperation in quality assurance: how QAAs can enhance cooperation in their quality assurance;

- networks of agencies: how networks of QAAs can facilitate information sharing and cooperation.

According to the toolkit, quality assurance agencies should share information about their respective QA systems and about cross-border providers, with a view to facilitating mutual understanding and building mutual trust. Consequently, quality agencies have to make clear and accessible policies for the quality of CBHE; should make it easily accessible a list of those institutions they have quality assured, including any eventual list of quality assured CBHE provision, and associated reports; must seek to establish regular channels of communication to facilitate information sharing, strengthen mutual understanding, and explore ways in which they can cooperate with each other in the QA of CBHE.

However, the ENQA's project (QACHE, 2015) addressed quality issues of CBHE between Europe and other continents and not exactly within Europe, leaving aside the

issues posed by the Services Directive as discussed in this book. It would therefore be interesting to combine the outcomes of ENQA's project, which emphasise the quality of CBHE intercontinentally, with the specificities of CBHE within specific continents, such as Europe, where the Services Directive plays a very important role.

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