Quality Assurance and work-based learning

A report for the WEXHE alliance

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INTRODUCTION

Since World War II, higher education in Europe has been marked by massification – an expansion of the higher education system, spurred by the need for an informed citizenry capable of participating in an advanced industrial society and which widened access from the few cultural elite to those also seeking to gain useful skills and knowledge[1]. The OECD has tracked the growth in this area, where – immediately following World War II – the proportion of European society enrolled in higher education was noted at 4-5 percent[2] to today, where the tertiary attainment rate for EU countries is 37 percent and growing[3].

While European higher education continues to inch towards universal access, it is presently battling criticism related to the stagnated labour markets caused by the 2007-08 financial crisis and subsequent period of recession which saw worrying youth unemployment rates that stubbornly persist today[4]. According to the European Commission's 2013 report[5], a lack of workplace experience and the related skills and competences is one of the factors contributing to a growing skills gap, and thus high youth unemployment rates, in Europe. Experts and policymakers believe part of the solution lies in work-based learning (WBL), an educational strategy that provides students with real-life work experiences where they can apply academic and technical skills and develop employability skills[6], thus facilitating young people's transition from the classroom to the office/jobsite.

The European Commission[7] identified three models of WBL which are presently in use in the vocational education and training (VET) sector:
1. Alternance schemes or apprenticeships. Learners spend a significant time on training in companies. In parallel, or in "alternating" periods, they acquire general and occupation-related knowledge and often complementary practical skills and key competences in VET schools or other education/training institutes.
2. On-the-job training periods in companies. This typically covers internships, work placements or traineeships that are incorporated as a compulsory or optional element of VET programmes leading to formal qualifications.
3. Integrated school-based programme. Schools or training centres have the main responsibility for creating close to real life or real life working environments through on-site labs, workshops, kitchens, restaurants, junior or practice firms, simulations, or real business/industry project assignments.

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[1] Trow, Martin. From Mass Higher Education to Universal Access: The American Advantage. Minerva 37: 303-328, 1999.

[2] Trow, Martin. Problems in the Transition from Elite to Mass Higher Education. Carnegie Commission on Higher Education. 1973.

[3] European Union – Country Note – Education at a Glance 2014: OECD Indicators. OECD. Available at: https://www.oecd.org/edu/European Union_EAG2014 Country Note.pdf.

[4] Skills Development and Employment: Apprenticeships, Internships and Volunteering. European Parliament. April 2017. Available at: http://www.europarl.europa.eu/RegData/etudes/STUD/2017/602056/IPOL_STU(2017)602056_EN.pdf.

[5] Work-Based Learning in Europe: Practices and Policy Pointers. European Commission. June 2013. Available at: http://ec.europa.eu/dgs/education_culture/repository/education/policy/vocational-policy/doc/alliance/work-based-learning-in-europe_en.pdf.

[6] Work Based Learning. Public Schools of North Carolina website. Accessed January 2018. Available at: http://www.dpi.state.nc.us/cte/curriculum/work-based/

[7] Work-Based Learning in Europe: Practices and Policy Pointers. European Commission. June 2013. Available at: http://ec.europa.eu/dgs/education_culture/repository/education/policy/vocational-policy/doc/alliance/work-based-learning-in-europe_en.pdf.

Bearing the above in mind, the EU-funded "Integrating Entrepreneurship and Work Experience into Higher Education (WEXHE)" project, which runs from January 2017 until December 2019, aims to serve as a kind of catalyst in this regard by supporting the development of WBL in the higher education sector (as opposed to the VET sector, where there has been much progress already in orienting studies to the labour market), with the ultimate ambition of enhancing the value of higher education and supporting the transition of graduates into the labour market. The consortium consists of the following ten partners:

- University of Groningen, the Netherlands (project coordinator)
- University of Warwick, United Kingdom
- University of Ljubljana, Slovenia
- University of Applied Sciences Münster, Germany
- Novatex Solutions, Ltd., Cyprus
- The University Industry Innovation Network (UIIN), the Netherlands
- Spanish Chamber of Commerce, Spain
- Polish Chamber of Commerce, Poland
- European Association for Quality Assurance in Higher Education (ENQA), Belgium
- European Association of Institutions in Higher Education (EURASHE), Belgium

Within the WEXHE framework, project partners will work to identify and analyse the current provision of work experience in higher education institutions (HEIs) in seven different EU countries, generating 84 case studies involving all four of Biglan's[8] academic areas, covering work placements, traineeships, and entrepreneurship. Complementary research – comprising an analysis based upon a literature review of key, publicly available documents and a survey to European quality assurance agencies – has been performed by ENQA, which has explored the issue with a particular focus on quality assurance: for instance, where WBL is concerned, which quality assurance criteria are used, and how are they applied and tested? The results of this question are contained in the present report and will contribute to the project consortium's eventual development of 12 replicable modules of WBL, with guidance on management, quality assurance, learning outcomes, funding, and accreditation included.

The WEXHE project consortium is attempting to fuse the concept of WBL with that of higher education, an endeavour that will likely be met with challenges. The tension felt by HEIs between finding an appropriate response to growing external pressures for a curriculum more relevant to employment needs while maintaining academic standards and values is well noted[9]. As Brennan and Little state, "developments directed towards the achievement of the former are frequently perceived to run counter to the preservation of the latter". Thus, the context is one in which resistance may be felt, a point to be appreciated while considering the contents of the following literature review and survey outcomes.

TERMINOLOGY

At the onset of this study, a review of the literature concerning quality and WBL in Europe seemed synonymous with a review of the literature of quality and the VET sector. In fact, a well-cited definition

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[8] Biglan, A. The characteristics of subject matter in different scientific areas, Journal of Applied Psychology, 57: 195-203. 1973.
Defined as: hard-pure, e.g. natural sciences; soft-pure, e.g. humanities and social sciences; hard-applied, e.g. medicine; and soft-applied, e.g. social work.

[9] John Brennan and Brenda Little. A Review of Work Based Learning in Higher Education. Quality Support Centre, The Open University. October 1996. Available at:
https://www.open.ac.uk/cheri/documents/Areviewofworkbasedlearninginhighereducation.pdf.

of WBL includes the term VET within it: "work-based learning is the acquisition of knowledge and skills through carrying out – and reflecting on – tasks in a vocational context, either at the workplace (such as alternance training) or in a VET institution"[10]. The authors were challenged to find literature on WBL that was removed from the VET context, in order to understand it better in the higher education context (this in itself is an indication that the WEXHE consortium is developing a frontier – a testament to the innovative nature of the project). Nonetheless, the authors have selected the following terms and definitions to aid readers in their understanding of the report that follows.

Apprenticeship
According to the European Parliament's recent study[11], there is not a commonly agreed definition of apprenticeship in Europe; opinions vary on whether apprenticeships are based on employment contracts or on contracts with the apprentice and the school (and an agreement with the employer) and whether apprenticeships are remunerated or not. Despite these discrepancies, apprenticeships have been described as having the following characteristics:
- learning that alternates between a workplace and an educational or training institution;
- part of formal education and training;
- on successful completion, learners acquire a qualification and receive an officially recognised certificate.

While apprenticeships (as with VET) is a concept not ordinarily included within the WEXHE project framework, much of the available literature on quality and WBL relates to apprenticeships, and the authors consider that experiences with that model (and VET in general) may be applicable to others as well, thus its inclusion herein.

Internship/traineeship
The European Parliament study defines an internship/traineeship as a work practice (either as part of a study curriculum or not) including an educational/training component which is limited in time. They are predominantly short to medium-term in duration (from a few weeks up to six months, and in certain cases lasting one year). Roughly, three broad categories of traineeships/internships can be distinguished:
- Internships that are part of vocational/academic curricula or are part of (mandatory) professional training;
- Internships associated with active labour market policies;
- Internships in the open market.

Entrepreneurial education
A report by the United Kingdom's Quality Assurance Agency for Higher Education (QAA)[12] explains that the goal of enterprise education is to:
> *produce graduates with an awareness, mindset, and capability to generate original ideas in response to identified needs, opportunities, and shortfalls, and the ability to act on them, even if circumstances are changing and ambiguous.*

Entrepreneurship education, on the other hand, aims to:

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[10] Terminology of European education and training policy. Cedefop. May 2014. Available at: http://www.cedefop.europa.eu/en/publications-and-resources/publications/4117
[11] Skills Development and Employment: Apprenticeships, Internships and Volunteering. European Parliament. April 2017. Available at:
http://www.europarl.europa.eu/RegData/etudes/STUD/2017/602056/IPOL_STU(2017)602056_EN.pdf.
[12] Enterprise and Entrepreneurship Education: Guidance for UK Higher Education Providers. Quality Assurance Agency for Higher Education. January 2018. Available at: http://www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3222#.Wnguw4jwbD4.

build upon the enterprising competencies of students who are capable of identifying opportunities and developing ventures, through becoming self-employed, setting up new businesses or developing and growing part of an existing venture. It focuses on the application of enterprising competencies and extends the learning environment into realistic risk environments that may include legal issues, funding issues, start-up, and growth strategies.
Taken together, the two comprise "entrepreneurial education".

BACKGROUND

Learners who benefit from high-quality learning in the workplace can be put in situations that help them develop problem-solving abilities and the capacity to adapt to change as they encounter new and different workplace practices, technologies, and environments. Conversely, on-the-job training periods that are unplanned and unstructured provide limited opportunity for any real learning or skills development to take place. With so much at stake, many discussions concerning WBL also include the topic of quality.

European level
The European Alliance for Apprenticeships in its Council Declaration of 15 October 2013 outlines its key messages for combatting youth unemployment and inactivity, by: providing regulatory and institutional frameworks; integrating apprenticeships in formal education and training; providing strong, work-based, high-quality learning and training component; assuring participation of young people with fewer opportunities; and promoting apprenticeship schemes through awareness raising.

According to a report from the European Parliament[13], there are a number of European-level initiatives, following the Bruges (2010) and Riga (2015) conclusions on VET, which aim to ensure that WBL is of high quality. They emphasise the need for shared responsibility, involving employers and small and medium-sized enterprises (SMEs), and alignment to the labour market needs, while giving attention to the quality of learning itself.

In a 2015 publication[14], the European Commission identified 20 guiding principles for stakeholders involved in WBL. The principles focus on four main themes: involving national governance and social partners; supporting companies, in particular SMEs; making apprenticeships attractive and improving career guidance; and quality assurance. The principles relating to external quality assurance (an accountability mechanism whereby the existence and use of appropriate procedures is verified by an external body), the primary topic for this report, include:
- Providing a clear framework for quality assurance of apprenticeships at the system, provider, and company levels, ensuring systematic feedback
- Ensuring the content of VET programmes is responsive to changing skill needs in companies and society
- Fostering mutual trust and respect through regular cooperation between apprenticeship partners
- Ensuring fair, valid, and authentic assessment of learning outcomes

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[13] Skills Development and Employment: Apprenticeships, Internships, and Volunteering. European Parliament. April 2017. Available at:
http://www.europarl.europa.eu/RegData/etudes/STUD/2017/602056/IPOL_STU(2017)602056_EN.pdf.
[14] High-performance apprenticeships & work-based learning: 20 guiding principles. Cedefop. 2015. Available at: http://www.cedefop.europa.eu/hr/toolkits/vet-toolkit-tackling-early-leaving/resources/high-performance-apprenticeships-work-based.

- Supporting the continuous professional development of in-company trainers and improving their working conditions

The European Trade Union Confederation (ETUC)[15] proposed 20 quality standards (with accompanying quality criteria and examples of best practice) for apprenticeships. The ETUC framework proposes, for example, to protect apprenticeships against misuse by using the term only for statutory apprenticeships and for ensuring apprentices are paid by the employer, according to collective agreements or a national and/or sectoral minimum legal wage, for the period of training. The standards also include measures relating to external review, such as giving social partners (trade unions and employers' organisations) the responsibility for monitoring the suitability of workplaces and for accrediting interested companies and employing robust quality assurance procedures on apprenticeship schemes.

BusinessEurope shared its vision for WBL[16] to the European Commission in December 2016, lamenting the present supply of quality and effective WBL opportunities and providing suggestions to the Commission, member states, and social partners on how partnerships and proper support can further improve WBL.

Global level
Quality WBL has been given global attention as well. During the International Labour Conference in 2014, governments were encouraged to "[regulate and monitor] apprenticeship, internship and other work-experience schemes… to ensure they allow for a real learning experience and do not replace regular workers".

In its 2012 note on quality apprenticeships for the G20 Task Force on Employment[17], the OECD attributes individual apprenticeship/traineeship agreements – in which the roles and responsibilities of all parties are delineated and apprentice/trainee terms and conditions specified, with explicitly stated elements such as the aims of the placement, its content and duration, the responsibilities and obligations of the parties involved, the status of the trainee and any remuneration or social security contributions – as one way to ensure the delivery of quality placements. The same note also echoes concerns mentioned during the International Labour Conference – that the external accreditation of companies is important for ensuring that companies are genuinely committed to the programme and do not aim to use apprentices/trainees as sources of free or cheap labour or in place of regular staff. In Europe, these issues were addressed by the European Commission's Council Recommendation on a Quality Framework for Traineeships (QFT)[18], which was adopted in March 2014 by the Council of the European Union.

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[15] A European quality framework for apprenticeships: a European Trade Union proposal. European Trade Union Confederation. 2016. Available at:
https://www.etuc.org/sites/www.etuc.org/files/publication/files/a_european_quality_framework_for_apprenticeships_en.final_.corr_.pdf.
[16] Opinion of the Advisory Committee on vocational training (ACVT) addressed to the European Commission on A Shared Vision for Quality and Effective Apprenticeships and Work-based Learning. Business Europe. December 2016. Available at:
https://www.businesseurope.eu/sites/buseur/files/media/position_papers/social/final_version_acvt_opinion.pdf.
[17] Note on quality apprenticeships for the G20 Task Force on Employment. OECD. September 2012. Available at: https://www.oecd.org/els/emp/OECD%20Apprenticeship%20Note%2026%20Sept.pdf.
[18] Council Recommendation on a Quality Framework for Traineeships (QFT). European Commission. December 2013. Available at: http://ec.europa.eu/social/main.jsp?catId=1045.

External quality assurance of WBL

Within the discussion on WBL and quality, there are occasional remarks – as seen in the above text – on external quality assurance and/or accreditation. For instance, in the previously mentioned European Commission report[19], external quality assurance can ensure that employers participating in WBL opportunities comply with established requirements, verifying the existence of internal processes for planning, implementing, and assessing WBL to make sure that students develop the expected knowledge, skills, and competence.

The report acknowledges that quality assurance measures in place for institutions are not necessarily appropriate for employers, stating that employer accreditation is often performed to determine the suitability of the training premises from a health and safety perspective, the suitability of the trainers' technical/personal experience and qualifications, and the quality of the training on offer and suitability of existing facilities and materials. In some cases, the accreditation of employers is carried out by the relevant trade committee, local craft chamber, or chamber of commerce and industry, thereby encouraging cooperation and collaboration between employers and other key stakeholders involved in WBL. Accreditation of employers can deter employer involvement, however, if the quality assurance measures are considered overly burdensome.

In other cases, the above-mentioned bodies or even the VET providers themselves may be requested to check that the company complies with a certain set of criteria after which they are then (at least partly) accountable for the quality of the learning experience, while the employer remains responsible and accountable for aspects related to health and safety and labour regulations (the control of which falls under the remit of a labour inspection). Examples of this from the Netherlands and Belgium (Flanders) are provided in the report, as well as one from the United Kingdom which describes legislation that was enacted, restricting funding for institutions that do not meet quality standards, and one from Sweden which describes how companies, institutions, and municipalities collaborate with a common aim to increase the attraction and quality of technology-focused courses (for example, by planning the content and quality of WBL).

The European Commission report, as with many others which discuss quality assurance and WBL, do so within the context of VET. For instance, an important instrument, developed by EU member states in cooperation with the European Commission and called the European Quality Assurance Reference Framework for VET[20], comprises a quality assurance and improvement cycle of planning, implementing, evaluating/assessing, and reviewing/revising VET, supported by common quality criteria, descriptors, and indicators[21] designed to increase transparency and mobility, valorise permeability in a lifelong learning perspective, and make VET more attractive.

However, where WBL occurs within HEIs, far fewer developments have taken place at the European level. Unlike VET institutions, HEIs in Europe are subject to the Standards and guidelines for quality

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[19] Work-Based Learning in Europe: Practices and Policy Pointers. European Commission. June 2013. Available at: http://ec.europa.eu/dgs/education_culture/repository/education/policy/vocational-policy/doc/alliance/work-based-learning-in-europe_en.pdf.

[20] European Quality Assurance Reference Framework. EQAVET. Available at: http://www.eqavet.eu/gns/policy-context/european-quality-assurance-reference-framework.aspx.

[21] Recommendations of the European Parliament and of the Council of 18 June 2009 on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training. European Parliament. June 2009. Available at: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2009:155:0001:0010:EN:PDF.

assurance in the European Higher Education Area (ESG)[22]. The ESG are not standards for quality, nor do they prescribe how the quality assurance processes should be implemented; rather, they provide guidance, covering the areas which are vital for successful quality provision and learning environments in higher education. As the ESG apply to all higher education offered in the EHEA regardless of the mode of study or place of delivery, and with respect to this diversity, the ESG have been written at a reasonably generic level in order to ensure that they are applicable to all forms of provision. Work-based learning is not specifically mentioned, but there are standards which could apply, depending on how they are interpreted.

SURVEY ON EXTERNAL QUALITY ASSURANCE OF WORK-BASED LEARNING

To find out if/how quality assurance (QA) agencies assess WBL in higher education, ENQA conducted a survey (Annex 1) of its members and affiliates in September-October 2017, for which it received responses from 40 QA agencies operating in the following countries, as well as from three agencies that operate European wide:

Austria	Estonia	Latvia	Serbia
Belgium	Finland	Lithuania	Slovenia
Bulgaria	France	Macedonia	Spain
Croatia	Germany	Netherlands	Switzerland
Cyprus	Greece	Norway	United Kingdom
Czech Republic	Ireland	Romania	
Denmark	Kazakhstan	Russia	

As ENQA has not previously explored the subject of WBL among its membership, the questionnaire was drafted according to the authors' limited knowledge of the subject. The responses did not allow for any quantitative analysis owing to their ambiguity (an indication that better, more precise questions could be posed if future research in the area is pursued). Nonetheless, the responses provide some valuable initial insight.

In some cases, respondents elected that their agency not be named in the report.

Apprenticeships and internships
It should be noted that, depending on the relevant national qualifications framework, not all forms of WBL are available in all higher education contexts. This is true, for instance, in the cases of Croatia, Denmark, Estonia, Latvia, Lithuania, and – to some degree – Switzerland, where "apprenticeships" do not exist in the higher education sector (rather, they may be found in the VET sector), and in the case of certain medical fields, where students gain work experience by participating in clinical internships only. In these cases, the agencies' responses were therefore limited to the applicable WBL models.

In the European Higher Education Area (EHEA), it is understood that HEIs have the primary responsibility for the quality of their provision and its assurance. In the United Kingdom, the Quality Assurance Agency for Higher Education (QAA) supports the development of internal quality assurance (IQA) procedures, as evidenced by their work in maintaining and publishing the Quality Code[23], a set of expectations which all HEIs (in all four nations and including those delivering education overseas)

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are required to fulfil when designing programmes of study and policies on academic standards. The Quality Code, introduced in 2012, includes a chapter[24] specifically intended to respond to the increase in alternative sites and contexts for learning/assessment, the development of which has been spurred by factors such as widening access, the promotion of lifelong learning, increased student employability, and greater participation in joint programmes. The relevant expectation is:

> *Degree-awarding bodies take ultimate responsibility for academic standards and the quality of learning opportunities, irrespective of where these are delivered or who provides them. Arrangements for delivering learning opportunities with organisations other than the degree-awarding body are implemented securely and managed effectively.*

Indicators with further explanations are provided in Annex 2. A few examples include:

1. A strategic approach to delivering learning opportunities with others is adopted. Appropriate levels of resources (including staff) are committed to the activities to ensure that the necessary oversight is sustained.
2. The risks of each arrangement to deliver learning opportunities with others are assessed at the outset and reviewed subsequently on a periodic basis. Appropriate and proportionate safeguards to manage the risks of the various arrangements are determined and put in place.
3. Degree-awarding bodies clarify which organisation is responsible for admitting and registering a student to modules or programmes delivered with others, and ensure that admissions are consistent with their own admissions policies.
4. Degree-awarding bodies ensure that modules and programmes offered through other delivery organisations, support providers, or partners are monitored and reviewed through procedures that are consistent with, or comparable to, those used for modules or programmes provided directly by them.

With the appropriate quality measures in place, whether at the institutional or programme level, the QA agencies will normally assess them, checking that they are sufficiently robust and appropriate, while respecting the autonomy of the HEIs, and providing enhancement-related guidance. It is seldom the case that a QA agency will directly assess the quality of a WBL environment, however, it can be seen in certain fields such as in studies relating to healthcare professions. The European Council on Chiropractic Education (ECCE) performs on-site evaluations of clinical internships. ECCE's *Accreditation procedures and standards in first qualification chiropractic education and training[25]* comprise a common set of standards that can be applied to all first qualification chiropractic education and training programmes; they may be modified or supplemented (but not compromised) by national legislation. Concerning WBL, there are standards covering the clinical training:

> *The institution/programme must identify and include a period of supervised clinical training to ensure the clinical knowledge and skills, communication skills, and ethical appreciation accrued by the student can be applied in practice, and so enable the student to assume appropriate clinical responsibility upon graduation…Every student must have early patient contact leading to participation in patient care.*

When assessing the quality of WBL, the evidence used in ECCE's evaluations consists of:

1. Evaluation of the numbers of patients each intern sees in a calendar year.

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[24] Chapter B10: Managing Higher Education Provision with Others. Quality Assurance Agency for Higher Education. 2012. Available at: http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/quality-code-part-b.

[25] Accreditation procedures and standards in first qualification chiropractic education and training. European Council on Chiropractic Education. December 2015. Available at: http://www.cce-europe.com/downloads.html.

2. The variety of clinical conditions presented to each intern (each intern must maintain a clinical log book throughout their clinical year; the site team looks at several of these randomly selected).
3. The completeness of documentation in the patient records (a random sample of documents are reviewed during a site evaluation visit).
4. The ratio of interns to clinical supervisors.
5. The appropriateness and rigor of the Clinic Exit Examination.
6. The pass rate on the Clinic Exit Examination.
7. Observation of interns during their clinical encounters (one site team member spends one day doing this).
8. The way that current research (i.e. evidence-based practice) is incorporated into treatment decisions (based on patient records and discussions with interns and supervisors).

Several agencies (for example, those from Austria, the Czech Republic, Lithuania, the Netherlands, Serbia, Spain, Switzerland, and the United Kingdom) commented that their interest in WBL is restricted to those cases in which it forms an integrated part of the curriculum or is awarded credit. In these cases, WBL is covered by the HEIs' IQA processes, in the same way all other learning provision is. In order to determine whether an HEI's relevant IQA procedures are sufficiently robust, rather than examining the site of the WBL itself (as ECCE does), QA agencies may seek evidence from the HEI, examples of which include:

- Description, including formulation of learning outcomes in the curriculum (module descriptions/manual)
- Protocol for assigning internships/apprenticeships and tutors
- Student support during the work placement
- Qualification of personnel supporting students in the company (instructors)
- Rules/regulations regarding the assessment of placements (usually part of the examination rules)
- Cooperation agreements with companies on the offering of work placements
- Integration of work placements into the IQA procedures, which may include evaluations of the students' performance as well as evaluations of the placements and support structures
- Results of practical work (such as projects and research results)

One of the survey respondents representing NCPA (the National Centre for Public Accreditation, Russia) opines that visits to the sites of WBL could improve quality further:

> *During the external quality assurance of work-based learning mostly regulating documents are reviewed, whereas to improve the process a more qualitative approach should be taken with a site visit to the places of training and interviews with students and their training supervisors.*

The respondent later admits, however, that any additional quality measures, such as those just mentioned, could easily over-burden the external reviewers.

In Croatia, the current Strategy for Education, Research and Technology (2014-20) envisages that HEIs will enhance their activities in connecting with the world of work and that ASHE (the Agency for Science and Higher Education), the national QA agency, will encourage and quality assure those activities. ASHE's efforts can be seen already when comparing the types and amount of evidence required during the first cycle of institutional evaluations and those which were completed more

recently in the second cycle. In its assessment of the University of Split's Faculty of Law, the expert panel states[26]:

> *The Faculty has several legal clinics that provide opportunity for students to participate in practical legal works and compulsory practical training in the fifth year as prescribed by Croatian law. Moreover, students can participate in moot court competitions where they can simulate trials. However, it seems that there are little efforts on behalf of the Faculty to build any further links with businesses or the local community to ensure students [are able to] utilize their knowledge in different contexts.*

Quality assurance agencies from Bulgaria, Finland, and Norway responded that WBL is not part of their external quality assurance (EQA) procedures, either because it is not yet developed or because it is not seen as an issue of importance/relevance.

Entrepreneurial studies

Entrepreneurial studies is, generally, not given any special focus by QA agencies. For instance, in an example provided by the Belgian (French-speaking) QA agency AEQES (Agency for Quality Assurance in Higher Education), a bachelor in marketing might include learning activities with practical simulations of setting up a company, but this portion of the curriculum is evaluated as all others are. The Danish Accreditation Institution makes a similar point but remarks that – despite the lack of a special entrepreneurship focus – there is a strong emphasis on the relevance of programmes in relation to the labour market and society; for instance, in some programme accreditations where high levels of graduate unemployment may be seen, expert review panels have discussed whether a focus on entrepreneurship in the programmes could support better employment.

The Commission des Titres d'Ingénieur (CTI), a specialist QA agency responsible for evaluating engineering programmes offered by French HEIs, operates according to guidelines which specifically address entrepreneurship[27] (translated from French):

> *B.2.2 – Innovation, valorisation, transfer, and entrepreneurship*
> - *The school has a clearly identified strategy in the areas of innovation, valorisation, transfer of research results, and entrepreneurship. Its objectives and means are explained in the strategic guidance note and its implementation is periodically monitored.*
> - *Through its pedagogical and research activities, the school contributes to the creation of innovative projects, products or services, activities, and businesses.*
> - *The school owns or shares the appropriate structures to carry out these activities.*
> - *The school involves all its teachers and students in these activities.*

Another unique practice comes from Finland, where – ordinarily – the national QA agency does not give any attention to quality assuring any form of WBL; however, HEIs have the possibility to choose a function that is central to its strategy or profile as an optional assessment area. According to the respondent from FINEEC, the Finnish Education Evaluation Centre:

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[26] Report of the Expert Panel on the Re-accreditation of the University of Split Faculty of Law. Agency for Science and Higher Education. November 2015. Available at:
https://www.azvo.hr/images/stories/Akreditacija/2014-2015/Pravni%20fakultet%20u%20Splitu%20EN.pdf.

[27] B.2.2 – Innovation, Valorisation, Transfert et Entrepreneuriat. Commission des Titres d'Ingénieur. Available at: https://www.cti-commission.fr/fonds-documentaire/document/15/chapitre/244?a=1.

> *So far three HEIs have chosen entrepreneurship studies as their optional assessment area. No specific evidence is requested from the HEIs, but [they] need to show that they have evidence that their quality management procedures advance the development of their operations and the achievement of goals set for the operations, that their quality system produces relevant information for the development of operations and the information is used for this purpose, that personnel groups and students are involved in quality work and that external stakeholders also participate in it, and that the quality management of support services function.*

For instance, in FINEEC's audit of JAMK University of Applied Sciences[28], an institution which aims to be Finland's "most entrepreneurship-oriented university of applied sciences", an entire section of the report is dedicated to evaluating how well the HEI performs in this area. While commending the school in many of its efforts, for example, for introducing an institution-wide curriculum model with obligatory entrepreneurship courses for all students, the expert panel criticises JAMK's lack of a systematic or coherent quality management and development procedure and for the lack of a common definition of entrepreneurship, which could make it easier for JAMK to identify appropriate targets and pathway(s) or to gauge when its aims have been achieved. The section concludes with several suggestions for improvement from the expert panel, including one which recommends the school implement an innovation and intellectual property rights management system.

The United Kingdom's QAA has recently published *Enterprise and Entrepreneurship Education: Guidance for UK Higher Education Providers[29]*, a document which aims to capture the impact of QAA's 2012 guidance on enterprise and entrepreneurship and to provide a future roadmap for entrepreneurial education. The authors contend that students with enterprise and entrepreneurship competencies are more likely to engage in entrepreneurial action, whether it be in the context of self-employment, creating a new business venture, social entrepreneurship, or "intrapreneurship" (the application of enterprise behaviours, attributes and skills within an existing micro or small business, corporate or public-sector organisation). Such competencies can be gained when the entrepreneurial curriculum considers students' prior learning and the context of their subject specialism. The publication acknowledges that entrepreneurial learning is not always linear, and that learning and assessment strategies should consider the following distinctions:

1. Learning "about": knowledge acquisition through the study of the topic;
2. Learning "for": a more practical goal, such as, learning how to be more entrepreneurial; and
3. Learning "through": the practical application of entrepreneurial activity requires the development of enhanced reflection skills and relates to practical activities, such as start-ups, venture creation programmes and incubators, or accelerators.

Additional practical insights are shared in the publication, which offers a wealth of considerations for HEIs exploring the topic.

Further insights
While some respondents indicated that changes in quality assurance of WBL are underway, with it being too soon to report any results, one other cautions against higher education systems that give too much focus on the labour market:

> *In 1980 in socialism, the new Slovenian Career-Oriented Education Act tried to regulate by law and by force higher education… on the idea that all education should be oriented directly towards work and a vocation. Undoubtedly, the crucial, although*

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[28] Audit of JAMK University of Applied Sciences. Finnish Education Evaluation Centre. 2013. Available at: https://karvi.fi/app/uploads/2014/09/KKA_0413.pdf.

[29] Enterprise and Entrepreneurship Education: Guidance for UK Higher Education Providers. Quality Assurance Agency for Higher Education. January 2018. Available at: http://www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3222#.Wnguw4jwbD4.

not the only, mistake of this law was that it restricted the role of HEIs to teaching alone, while establishing a system that neglected their scientific, artistic, and expert work…

The respondent from the Slovenian Quality Assurance Agency for Higher Education (SQAA) also makes a fair point when recalling that it was said recently that:

Corporate recruiters indicate that finding applicants with sufficient practical experience is their greatest challenge when recruiting from higher education institutions. On the other hand, corporations very rarely send their workers to [engage in lifelong learning] and gain additional knowledge and skills at HEIs. Collaboration [with] business, industry, and higher education must be done in both directions.

CONCLUSION

Those working in the field of external quality assurance of European higher education have often been accused of being on the reactionary side of progress, with developments taking place only once a deficiency has been perceived and a solution demanded. In the case of WBL and higher education, it is clear there is no European-wide approach: some QA agencies have a hands-on procedure, while others see their role as one which verifies that the IQA processes at HEIs alone are sufficient, and still others do not see it as within their mandate or deserving of special consideration at all. It is clear, also from the literature review, that the quality assurance of WBL in the higher education sector is one deserving of more attention – even at the very fundamental level of establishing a universal understanding of relevant terminology and which forms of WBL are in use in various national contexts.

The present report did, however, manage to identify some good and interesting practices, which will hopefully contribute to further dialogue on the subject and to the development of WEXHE's replicable WBL modules.

ANNEX 1: ENQA SURVEY ON WORK-BASED LEARNING IN HIGHER EDUCATION

ENQA is partner in the EU-funded project entitled "Integrating Entrepreneurship and Work Experience into Higher Education (WEXHE)", which aims to support the development of work-based learning in higher education (HE) (**understood as internships/work placements, apprenticeships and courses/programmes designed to encourage entrepreneurship**). The objective is to alleviate stakeholders' concerns on the shortcomings of the labour market orientation of HE and to find balance between the theoretical skillsets of graduates and the practical skills they require during their early careers.

Within this context, ENQA is tasked with surveying its membership in order to find out what role quality assurance plays: **what criteria are used, and how are they applied and tested**? Kindly note that WEXHE's focus, and the survey herein, is **limited to the higher education sector only**, as opposed to the VET/further education sector.

The survey is addressed to all ENQA members and affiliates that are QA agencies in the EHEA and should not take longer than 20 minutes to complete. Please attempt to answer all questions. Where needed, please feel free to consult your colleagues in order to achieve as comprehensive and accurate responses as possible. Please note that you do not have to complete the survey in one sitting. You may exit the survey and you or any other person with access to the same computer (and the same IP address) and the survey link may go back to previous pages in the survey and update existing responses until the survey is completed. You can access the full text of the survey here.

The **closing date for the survey is 9 October 2017**. If you have any questions about the survey, please contact Lindsey Kerber or Anaïs Gourdin at the ENQA Secretariat at secretariat@enqa.eu.

Please note that your responses will not be used to evaluate or review your agency or for any purpose other than stated above.

Identification and profile of agency
1. Name of your agency
2. Person completing the questionnaire
   - Name and surname
   - Position/title
   - Email
3. Grant/refuse permission for ENQA to publish your responses
   o I give permission for my agency to be identified with the responses I give in the WEXHE project report.
   o I do not give permission for my agency to be identified with the responses I give in the WEXHE project report (your responses will be reported anonymously).

Mandate of agency
4. Does your agency have an official mandate where quality assurance of work-based learning at HEIs is concerned?
   o Yes (please elaborate)
   o No

To what extent and how quality assurance of work-based learning is conducted by HEIs

5. Do HEIs in your country/system/remit currently address work-based learning (for the following types) in their IQA systems and procedures? (always, frequently, occasionally, never)
   - Internships/work placements
   - Apprenticeships
   - Entrepreneurship courses/programmes
6. Is work-based learning at HEIs covered by the EQA processes of your agency? (Fully covered (systematically in all processes), Partially covered (only in some processes and/or not systematically, etc.), no)
   - Internships/work placements
   - Apprenticeships
   - Entrepreneurship courses/programmes
7. For those which are fully or partially covered, does your agency and/or some other entity provide any written rules or guidelines? Please select the "N/A" choice if you answered "no" to all of the above items.
   - If yes, please briefly explain the content of these rules or guidelines and to whom they are addressed. Please also include a link to the rules/guidelines, if available.
8. For those which are fully or partially covered, could you please specify the kind of evidence that is requested/taken into account when assessing the quality of work-based learning at HEIs?
9. Please provide the web address to some evaluation/accreditation reports produced by your agency that address work-based learning at HEIs. It is also possible to send examples of reports to the following e-mail address: secretariat@enqa.eu.
10. In your opinion, is there a need for QA agencies to improve the way they address work-based learning at HEIs?
    o Absolutely
    o To a certain extent
    o Not really
11. What do you think the contribution of QA agencies should be regarding work-based learning at HEIs?
12. What do you think the role of ENQA should be in supporting the quality assurance of work-based learning?
13. Final comments?

ANNEX 2: INDICATORS FROM THE QUALITY CODE'S CHAPTER ON MANAGING HIGHER EDUCATION PROVISION WITH OTHERS

1.	A strategic approach to delivering learning opportunities with others is adopted. Appropriate levels of resources (including staff) are committed to the activities to ensure that the necessary oversight is sustained.
2.	Governance arrangements at appropriate levels are in place for all learning opportunities which are not directly provided by the degree-awarding body. Arrangements for learning to be delivered, or support to be provided, are developed, agreed and managed in accordance with the formally stated policies and procedures of the degree-awarding body.
3.	Policies and procedures ensure that there are adequate safeguards against financial impropriety or conflicts of interest that might compromise academic standards or the quality of learning opportunities. Consideration of the business case is conducted separately from approval of the academic proposal.
4.	Degree-awarding bodies that engage with other authorised awarding bodies to provide a programme of study leading to a joint academic award satisfy themselves as to their own legal capacity to do so.
5.	The risks of each arrangement to deliver learning opportunities with others are assessed at the outset and reviewed subsequently on a periodic basis. Appropriate and proportionate safeguards to manage the risks of the various arrangements are determined and put in place.
6.	Appropriate and proportionate due diligence procedures are determined for each proposed arrangement for delivering learning opportunities with an organisation other than the degree-awarding body. They are conducted periodically to check the capacity of the other organisation to continue to fulfil its designated role in the arrangement.
7.	There is a written and legally binding agreement, or other document, setting out the rights and obligations of the parties, which is regularly monitored and reviewed. It is signed by the authorised representatives of the degree-awarding body (or higher education provider without degree-awarding powers arranging provision by a third party) and by the delivery organisation, support provider or partner(s) before the relevant activity commences.
8.	Degree-awarding bodies take responsibility for ensuring that they retain proper control of the academic standards of awards where learning opportunities are delivered with others. No serial arrangements are undertaken without the express written permission of the degree-awarding body, which retains oversight of what is being done in its name.
9.	Degree-awarding bodies retain responsibility for ensuring that students admitted to a programme who wish to complete it under their awarding authority can do so in the event that a delivery organisation or support provider or partner withdraws from an arrangement or that the degree-awarding body decides to terminate an arrangement.
10.	All higher education providers maintain records (by type and category) of all arrangements for delivering learning opportunities with others that are subject to a formal agreement.
11.	Degree-awarding bodies are responsible for the academic standards of all credit and qualifications granted in their name. This responsibility is never delegated. Therefore, degree-awarding bodies ensure that the standards of any of their awards involving learning opportunities delivered by others are equivalent to the standards set for other awards that they confer at the same level. They are also consistent with UK national requirements.
12.	When making arrangements to deliver a programme with others, degree-awarding bodies fulfil the requirements of any professional, statutory and regulatory body (PSRB) that has approved or recognised the programme or qualification, in relation to aspects of its delivery and any associated formal agreements. The status of the programme or qualification in respect of PSRB recognition is made clear to prospective students.
13.	Degree-awarding bodies approve module(s) and programmes delivered through an arrangement with another delivery organisation, support provider or partner through processes that are at least as rigorous, secure and open to scrutiny as those for assuring quality and academic standards for programmes directly provided by the degree-awarding body.

14.	Degree-awarding bodies clarify which organisation is responsible for admitting and registering a student to modules or programmes delivered with others, and ensure that admissions are consistent with their own admissions policies.
15.	Degree-awarding bodies ensure that delivery organisations involved in the assessment of students understand and follow the assessment requirements approved by the degree-awarding body for the components or programmes being assessed in order to maintain its academic standards. In the case of joint, dual/double and multiple awards, or for study abroad and student exchanges, degree-awarding bodies agree with their partners on the division of assessment responsibilities and the assessment regulations and requirements which apply.
16.	Degree-awarding bodies retain ultimate responsibility for the appointment, briefing and functions of external examiners. The external examining procedures for qualifications where learning opportunities are delivered with others are consistent with the degree awarding body's approved practices.
17.	Degree-awarding bodies ensure that modules and programmes offered through other delivery organisations, support providers or partners are monitored and reviewed through procedures that are consistent with, or comparable to, those used for modules or programmes provided directly by them.
18.	Degree-awarding bodies ensure that they have effective control over the accuracy of all public information, publicity and promotional activity relating to learning opportunities delivered with others which lead to their awards. Information is produced for prospective and current students which is fit for purpose, accessible and trustworthy. Delivery organisations or support providers are provided with all information necessary for the effective delivery of the learning or support.
19.	When degree-awarding bodies make arrangements for the delivery of learning opportunities with others, they ensure that they retain authority for awarding certificates and issuing detailed records of study in relation to student achievement. The certificate and/or record of academic achievement states the principal language of instruction and/or assessment where this is not English.20 Subject to any overriding statutory or other legal provision in any relevant jurisdiction, the certificate and/or the record of achievement records the name and location of any other higher education provider involved in the delivery of the programme of study.21 Where information relating to the language of study or to the name and location of the delivery organisation or partner is recorded on the record of achievement only, the certificate refers to the existence of this formal record.