Policy brief External quality assurance of flexible learning pathways in the European Higher Education Area (November 2025)

Executive summary

Building on the commitment to have quality assured flexible learning pathways (FLPs), which was reaffirmed by the ministers of the European Higher Education Area in 2024, this policy brief maps country practices and suggests actions for implementation. Of the 28 countries surveyed, 23 have national regulations or guidelines for FLPs. Regarding quality assurance, most countries (25 out of 28) cover aspects of FLPs in their external quality assurance standards. In particular, FLPs to navigate through higher education (articulation policy, flexibility in the delivery mode, in the time and pace of study as well as in the curriculum) are the most widely covered aspects. FLPs for entry into higher education, including equity policy and recognition of prior learning are relatively well covered by countries while preparatory programmes and alternative pathways between different tertiary education sub-sectors are not covered by 13 and 8 out of the 28 countries respectively. Finally, as regards the quality assurance of FLPs to transition with the labour market, work-based learning, lifelong learning and labour market consultation are reviewed by at least 24 countries while 13 countries do not consider career guidance and counselling at all. Overall, it seems that the Tirana ministerial commitment on quality-assured FLPs appears to be rather well advanced, as most of the countries surveyed already include FLPs in their quality assurance systems. However, not all aspects are covered evenly. To better support policy implementation, this policy brief therefore invites:

- Ministries to define FLPs in a broad sense in national regulations to safeguard the autonomy of higher education institutions in implementing them.
- Agencies to put stronger emphasis on FLPs in institutional-level reviews as a core institutional policy rather than quality assuring all aspects of FLPs at programme level.
- Higher education institutions to include FLPs in their institutional strategy and support their implementation with targeted policies and monitoring indicators in a fit-for-purpose manner.

Where do countries stand in relation to the quality assurance of flexible learning pathways in the European Higher Education Area?
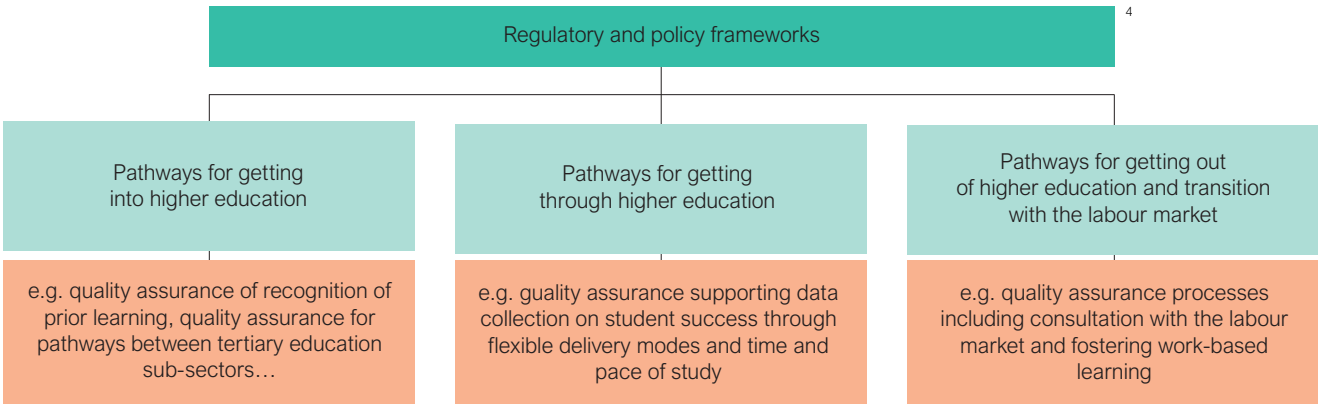
Context

The last Ministerial Communiqué of the European Higher Education Area (EHEA) from Tirana[1] includes a commitment stating that learning pathways need to be 'flexible, properly delivered, quality assured and recognised'. This policy brief therefore attempts to shed light on EHEA countries' practices regarding the external quality assurance of flexible learning pathways (FLPs) to support countries' implementation of such policies. The Education 2030 Agenda defined FLPs as 'entry points and re-entry points at all ages and all educational levels, strengthened links between formal and non-formal structures, and recognition, validation and accreditation of the knowledge, skills and competencies acquired through non-formal and informal education'[2]. In a recent study, IIEP-UNESCO[3] distinguished three stages of flexible learning pathways:
- pathways for getting into higher education (alternative entry for first entry, but also re-entry);
- pathways for getting through higher education (progression, transferability, and flexible study modes);
- pathways for getting out of higher education (graduation and transition with the labour market).

There is widespread agreement within the EHEA on the added value and relevance of FLPs in today's societies. FLPs support student-centred learning by adapting more effectively to students' (or learners') aspirations and interests, while preparing them better for the labour market. FLPs also support everyone, regardless of their social background, in benefiting from higher education at all stages of life. However, not everything can or should be flexible. For example, studies for regulated professions may not lend themselves to high flexibility, and too much flexibility in the higher education system could lead to a lack of clarity that may jeopardise students' smooth academic pathways and transitions into the labour market.

Although the concept of FLPs may be referred to by a different name in EHEA countries, this policy brief uses the term 'FLPs' as an umbrella term. Data were collected through desk research, an analysis of a survey sent to members of the Thematic Peer Group on Quality Assurance and a peer-learning workshop. This document is not intended to be exhaustive in its coverage of all aspects of quality assurance for FLPs; it focuses on the themes addressed in the survey and workshop.

Regulatory and policy frameworks [4]		
Pathways for getting into higher education	Pathways for getting through higher education	Pathways for getting out of higher education and transition with the labour market
e.g. quality assurance of recognition of prior learning, quality assurance for pathways between tertiary education sub-sectors…	e.g. quality assurance supporting data collection on student success through flexible delivery modes and time and pace of study	e.g. quality assurance processes including consultation with the labour market and fostering work-based learning

[1] Tirana communiqué (2024) : https://ehea.info/Immagini/Tirana-Communique1.pdf
[2] UNESCO (2016): https://unesdoc.unesco.org/ark:/48223/pf0000245656
[3] Martin & Furiv (2022): https://unesdoc.unesco.org/ark:/48223/pf0000383069/PDF/383069eng.pdf.multi
[4] Adapted from Martin & Furiv (2022, p.34)

Mapping of countries' quality assurance activities for flexible learning pathways

The concept of flexibility was discussed early on within the BFUG, with the first official mention appearing in a ministerial communiqué in 2001, in which the European Credit Transfer and Accumulation System (ECTS) was identified as a cornerstone of FLPs. The concept was further reinforced in the 2007 London communiqué through the introduction of 'student-centred higher education' culminating in the Principles and Guidelines to Strengthen the Social Dimension of Higher Education in the EHEA, adopted in the 2020 Rome Communiqué, which encouraged countries to implement legal regulations and administrative rules that allow sufficient flexibility in the design, organisation, and delivery of study programmes to reflect students' diverse needs. The various Bologna tools (e.g. the ECTS Users' Guide, the Qualifications Framework for the EHEA and the Lisbon Recognition Convention) have been designed to foster flexible learning pathways when applied jointly. These are complemented by the Standards and Guidelines for Quality Assurance in the EHEA (ESG), which promote trust. Countries have therefore been equipped to facilitate flexible learning pathways, and the data collected for this policy brief demonstrate a rather effective use of these tools. Of the 28 EHEA countries that contributed to the brief, 23 currently have national regulations or guidelines (e.g. a law, act or national framework) for flexible learning pathways which support their provision.

However, little data is available on the quality assurance of FLPs at the EHEA level. While the latest Bologna Process Implementation Report (BPIR, 2024) contains valuable insights into the implementation of various aspects of FLPs by EHEA countries, quality assurance of FLPs is only referenced within a single composite indicator concerning the recognition of prior learning. The data collected for this policy brief show that in most countries, quality assurance agencies (25 out of 28) cover aspects of FLPs in their external quality assurance standards. Out of these 25, nine countries cover these aspects extensively and 16 cover them to some extent.
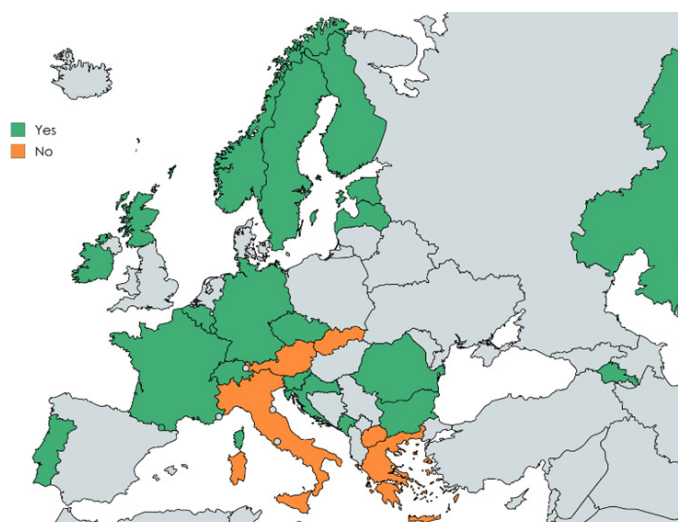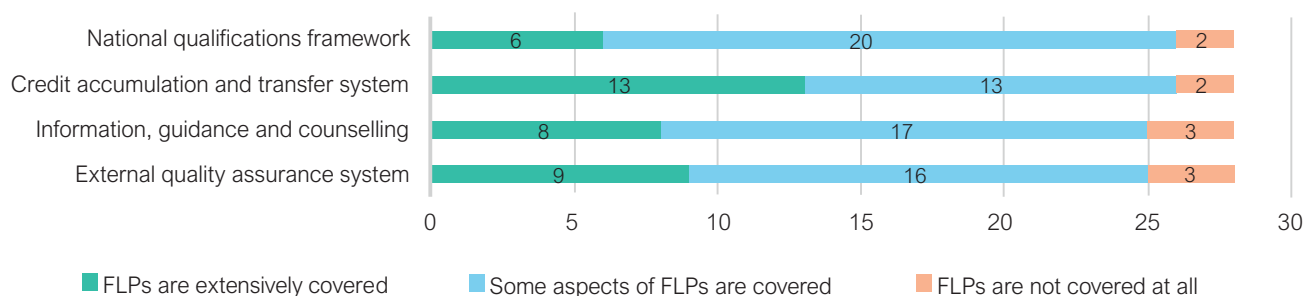

Does your country currently have national regulations or guidelines for flexible learning pathways?

The success of using quality assurance to foster FLPs may be due to the fact that the national systems of most respondents are aligned with the ESG, with 20 out of the 28 responding countries considering that the ESG provide substantial support for FLPs. Eight countries said that they partially support FLPs. They said that references to FLPs could be better addressed at the level of the standards rather than in the non-binding guidelines. Other countries suggested that the ESG could strengthen the connection between higher education and the labour market. However, by establishing agreed quality assurance standards within the EHEA, the ESG fosters trust and cooperation, thereby supporting FLPs between countries through student academic and professional mobility.

Beyond quality assurance, all the other national policy instruments used by the countries support FLPs rather well. The most successful of these is the implementation of the ECTS at a national level, which supports FLPs extensively and to some extent in 26 countries. Furthermore, since the Bologna tools jointly promote FLPs, there is also a snowball effect that reinforces the role of the ECTS. The ESG support their use in designing and approving programmes, and the latest Bologna Process Implementation Report shows that external quality assurance is increasingly monitoring the implementation of the ECTS in EHEA countries.

To what extent do your national policy instruments support flexible learning pathways (FLPs)?

	FLPs are extensively covered	Some aspects of FLPs are covered	FLPs are not covered at all
National qualifications framework	6	20	2
Credit accumulation and transfer system	13	13	2
Information, guidance and counselling	8	17	3
External quality assurance system	9	16	3

■ FLPs are extensively covered   ■ Some aspects of FLPs are covered   ■ FLPs are not covered at all

Although national regulations and guidelines in most EHEA countries strongly support the implementation of FLPs, agencies are rarely directly mandated to quality assure them. The legislative framework supporting the implementation of FLPs at a national level and the quality assurance legislation are often set out in separate documents. Therefore, it is important that agencies endorse national FLP regulations and guidelines and incorporate them into their external quality assurance (EQA) policies and procedures.

Box 1. Ireland – QQI mandate to quality assure flexible learning pathways

In Ireland, the agency (QQI) has a statutory function under section 56 of the 2012 Act to establish policies and criteria for access, transfer and progression in relation to learners, and to approve procedures developed by relevant providers other than previously established universities and linked providers. QQI is also responsible for reviewing the implementation of procedures for access, transfer and progression under section 9(g) of the 2012 Act. Currently, QQI's monitoring primarily occurs through provider and programme approval processes, as well as in conjunction with the cyclical review of providers' quality assurance systems. Additionally, QQI conducted a thematic analysis of the landscape of practices supporting access, transfer and progression[1], which concluded that the system was quite opaque due to the sheer number of pathways and the limited

information available. The report also suggests that QQI could support leaners' navigation through higher education with a database providing information on FLPs, demonstrating that agencies have an important role to play in supporting their smooth implementation.
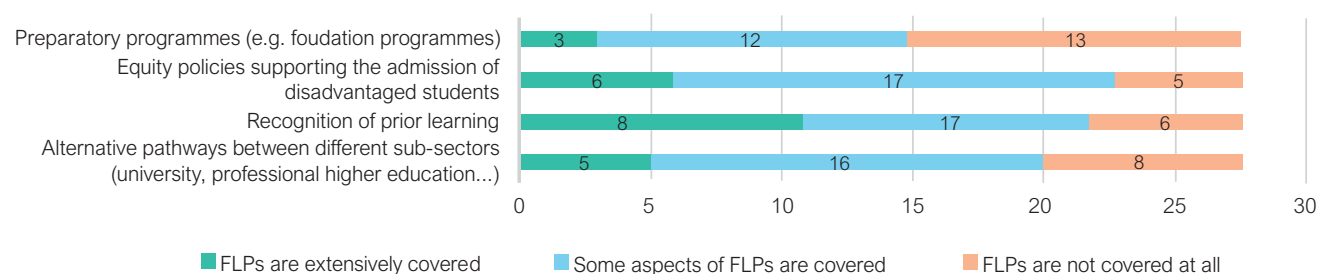
Key takeaway: granting the agency a mandate to quality assure FLPs ensures that this aspect is considered in external quality assurance procedures.

[1] QQI (2023): https://www.qqi.ie/sites/default/files/2023-11/2023-review-of-the-landscape-of-practice-supporting-atp-in-irish-education-and-training.pdf

EQA of flexible learning pathways to get into higher education

FLPs to get into higher education are important for overcoming access barriers for disadvantaged students and therefore support the social dimension of higher education. Such pathways also offer learners with diverse skills and profiles the chance to enter higher education through the recognition of prior learning or alternative pathways between different sub-sectors of tertiary education (university sector, higher education institutions for regulated professions, vocational education and training…). **Data show that countries have rather well-established quality assurance processes for equity policy and recognition of prior learning, but there is room for improvement in preparatory programmes and alternative pathways between different sub-sectors.**

Do/Does the quality assurance agencies/agency of your contry cover the following aspects of flexible learning pathways to get INTO higher education ?

	FLPs are extensively covered	Some aspects of FLPs are covered	FLPs are not covered at all
Preparatory programmes (e.g. foudation programmes)	3	12	13
Equity policies supporting the admission of disadvantaged students	6	17	5
Recognition of prior learning	8	17	6
Alternative pathways between different sub-sectors (university, professional higher education...)	5	16	8

Box 2. France – quality assurance in support of alternative pathways between sub-sectors

In France, the agency in charge of the quality assurance of engineering schools and degrees (CTI) has included guidelines on alternative pathways between engineering schools and other tertiary education sub-sectors. Students are usually recruited through competitive examinations, either after completing secondary education for 5-year engineering programmes or after preparatory classes for 3-year engineering programmes. However, the CTI also encourages engineering schools to recruit students coming from the university and university of technology sectors, as well as those students with a Specialised Technician Certificate. However, when doing so, the engineering school must '*verify the scope and level of the candidates' previous education, particularly in the basic sciences relevant to the engineering degree. Where necessary, the school provides appropriate support and additional teaching during the induction period to ensure the success of all students'*.

Key takeaway: Pathways between tertiary education sub-sectors can be included in agencies' standards to incentivise tertiary education institutions to include alternative entry pathways.

Box 3. United Kingdom – thematic evaluation of preparatory programmes

In the United Kingdom, the agency (QAA) undertook a sector-wide evaluation of preparatory programmes for international students, such as foundation programmes and 'Year One Programmes', which are designed to support international students' entry into UK higher education programmes. The report was commissioned by Universities UK. The evaluation of 185 international pathway programmes revealed broad equivalence between their entry requirements and those of domestic programmes, ensuring equitable access to higher education for national and international students. However, the QAA noted significant variance in the naming conventions used by providers to describe these programmes, creating confusion for applicants trying to benefit from flexible entry to higher education.

Key takeaway: Agencies can also conduct thematic evaluations, focusing on specific aspects of FLPs.

EQA of flexible learning pathways to get through higher education

FLPs to get through higher education are important to ensure students' right to agency, individualisation and re-orientation and are a core component of students-centred learning. They support catering for the diversity of learners' needs by adapting delivery modes and the time and pace of study. **Overall, FLPs to get through higher education are the aspect that is most frequently covered by agencies' external quality assurance procedures in the countries surveyed.** The implementation of articulation policies related to student transfers and credit accumulation has been strongly endorsed by EHEA ministerial communiqués, particularly through the implementation of the ECTS (Berlin 2003, London 2007, Yerevan 2015, Paris 2018, etc.). Similarly, there has been an increase in flexibility of delivery modes over the past decade, with the recent formalisation of frameworks and quality assurance procedures for online learning[1], as well as for microcredentials (Rome communiqué, 2020; IMINQA project, TPG-C, 2023).

Box 4. Belgium (French Community) – quality assurance of flexibility to get through higher education

The agency of the French Community of Belgium (AEQES), has been evaluating flexibility in the curriculum for over fifteen years through its programme evaluations with standards focusing on student learning path flexibility and questions provided to guide the as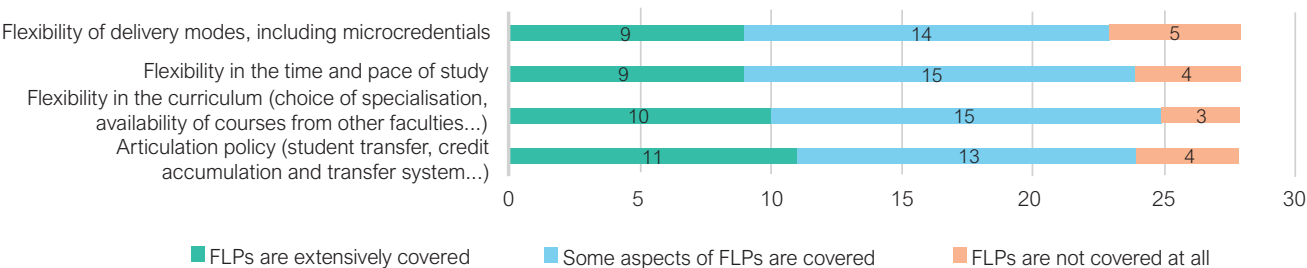sessment such as: '*What mechanisms enable students to choose individualised pathways within the programme? What are the limits imposed on flexibility? How are students informed about these mechanisms? To what extent do students make use of these mechanisms? What are the objectives in this area?*' AEQES also quality assures articulation policies, assessing whether students can transfer smoothly from one study programme to another: '*In terms of continuing or resuming studies, or transferring to another programme, how can we ensure that the learning outcomes are appropriate for the type of education, the level of the programme (bachelor's, master's) and its specific characteristics? Is the rate of utilisation of the various measures in line with the objectives?*'

Key takeaway: Agencies can evaluate FLPs to get through higher education, including flexibility in the curriculum and articulation policies directly with dedicated standards or they can incorporate them into a methodological guide supporting institutions' understanding of the process.

EQA of flexible learning pathways to transition with the labour market

FLPs are essential for facilitating the transition with the labour market, both to facilitate students' professional integration and to support learning opportunities throughout learners' professional lives. They ensure better alignment of learning outcomes with employer expectations, thereby

Do/Does the quality assurance agencies/agency of your country cover the following aspects of flexible learning pathways to get THROUGH higher education?

Aspect	FLPs are extensively covered	Some aspects of FLPs are covered	FLPs are not covered at all
Flexibility of delivery modes, including microcredentials	9	14	5
Flexibility in the time and pace of study	9	15	4
Flexibility in the curriculum (choice of specialisation, availability of courses from other faculties...)	10	15	3
Articulation policy (student transfer, credit accumulation and transfer system...)	11	13	4

■ FLPs are extensively covered ■ Some aspects of FLPs are covered ■ FLPs are not covered at all

[1] ENQA (2018) : https://www.enqa.eu/wp-content/uploads/Considerations-for-QA-of-e-learning-provision.pdf

strengthening students' employability and enabling learners to upskill and reskill in order to adapt to changes in the labour market. Additionally, while countries and higher education institutions (HEIs) should consult with employers, they cannot be expected to have all the answers regarding the needs of the labour market and how these align with students' profiles and interests. FLPs therefore provide an opportunity for students to test their skills directly in the labour market or to construct their own career profile. **Data shows that most quality assurance systems address work-based and lifelong learning, and HEIs' consultation with the labour market.** Lifelong learning has been addressed in several EHEA ministerial communiqués (London, 2007; Leuven/Louvain-la-Neuve, 2009; Bucharest, 2012, etc.), which may explain why most countries already cover this aspect extensively or to some extent in their external quality assurance processes. However, half of the responding countries do not quality assure career guidance and counselling policies at HEIs. This could undermine the effectiveness of FLPs, given that such policies are crucial for ensuring the overall coherence of learning outcomes and academic journeys.

Box 5. Croatia – quality assurance of career guidance and counselling policies
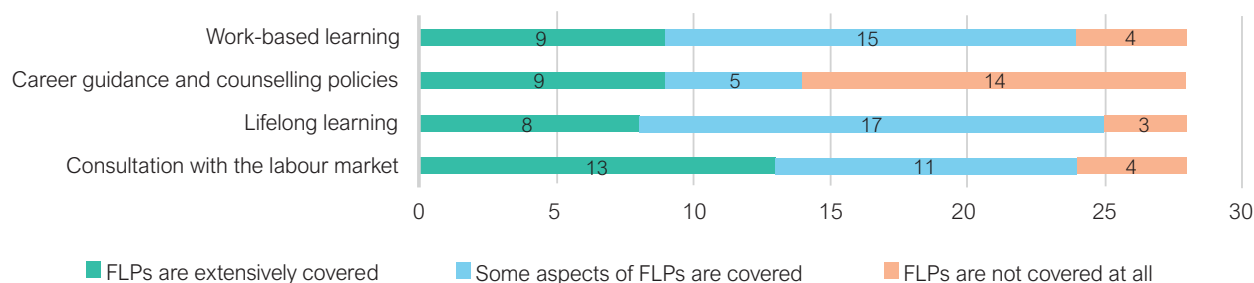
In Croatia, the agency (ASHE) has developed guidelines to review HEIs' career guidance and counselling policies during their initial accreditation, while making sure they benefit all students: '*The higher education institution has ensured that future students will have the opportunity to receive guidance on studying and career opportunities (for example, tutors, supervisors and other advisers as support in student learning and progress). […] The planned student support is tailored to a diverse student population (part-time students, mature students, students from abroad, students from underrepresented and vulnerable groups, students with learning difficulties and disabilities, etc.).*'

Box 6. Portugal – quality assurance of lifelong learning policies

In Portugal, the agency (A3ES) incorporated a standard on lifelong learning into its institutional accreditation procedures. Institutions should describe how they develop institutional strategies and policies that promote lifelong learning. In particular, they should explain how they develop a training offer aimed at diverse populations in flexible and creative learning environments that cover different types of target audience. The institutions should also identify the training offers developed within the scope of lifelong learning with the aim of attracting non-traditional students and adults.

Key takeaways: quality assurance of FLPs to transition with the labour market, including career guidance and counselling for students and lifelong learning policies, can be incorporated into the institutional reviews conducted by agencies to make sure that institutions have developed dedicated policies.

Do/Does the quality assurance agencies/agency in your country cover the following aspects of flexible learning pathways facilitating the TRANSITION WITH THE LABOUR MARKET?

	FLPs are extensively covered	Some aspects of FLPs are covered	FLPs are not covered at all
Work-based learning	9	15	4
Career guidance and counselling policies	9	5	14
Lifelong learning	8	17	3
Consultation with the labour market	13	11	4

■ FLPs are extensively covered ■ Some aspects of FLPs are covered ■ FLPs are not covered at all

Reflective questions to support the implementation of quality assurance of flexible learning pathways in the EHEA

According to the data collected in the framework of this policy brief, it seems that the Tirana ministerial commitment on quality-assured FLPs is rather well-advanced, given that most countries surveyed already include FLPs in their quality assurance system. However, not all aspects are covered evenly, and the countries surveyed might be the ones which already have national regulations favouring FLPs or have been more prone to implement the Bologna commitments. To better support policy implementation beyond the mapping exercise, it seems relevant for countries to ask themselves deeper questions about the degree to which they should quality assure FLPs and how they should do so.

What kind of regulations should there be for flexible learning pathways at the national level?
Regulating flexible learning pathways may limit the necessary flexibility that is fundamental to the concept. However, properly developed and targeted regulation can support FLPs, leading to their mainstreaming and enhanced trust. National frameworks and regulation policy should encourage FLPs and recognise them as a right for students, in line with the ESG's deeply rooted principle of student-centred learning. In order to support FLPs more effectively, national regulation should be rather flexible and light. Rather than detailing each aspect of FLPs individually, countries would benefit from incorporating them into their national qualifications framework and describing them in a broad sense that encompasses their various facets in their diverse regulatory documents. In terms of quality assurance, 'light' external

procedures by agencies do not mean HEIs should not keep developing FLPs; rather, the point is that they should decide for themselves how to organise FLPs to ensure they are fit for purpose. The level of regulation could also differ depending on the type of provider: HEIs that are regularly reviewed by an EQAR-registered agency could be granted more autonomy, while other private or alternative providers could face more rigorous regulation on the implementation of FLPs.

To what extent does the external quality assurance of flexible learning pathways by agencies affect the autonomy of higher education institutions?
Given that FLPs would benefit from flexible or light regulation, quality assurance standards that are too detailed or strict with regard to FLPs may hinder their development and limit the autonomy of HEIs. Therefore, while ministers mandated that FLPs be quality assured, overly detailed quality assurance standards might hinder institutional autonomy and the capacity to design successful FLPs. In this sense, rather than evaluating all aspects of FLPs, the external quality assurance could look into the institutional policy for FLPs and at whether FLPs are in place, by whom and how they were designed, as well as whether they are fit-for-purpose, achieving their intended purposes. They should also be communicated to learners in a transparent and clear way. The less rigid expectations imposed by agencies, the greater the autonomy for HEIs. In any case, the coverage of FLPs must be relevant to HEIs and other stakeholders, particularly students.

One solution for some systems could be to address FLPs primarily through external quality assurance at institutional level. This would

involve reviewing the overall policies and resources that support FLPs, as well as their implementation and monitoring, with the aim of achieving continuous enhancement through quality assurance. This approach would be more effective than checking the implementation of all aspects of FLPs at programme level, especially as some FLPs are rather implemented at the institutional level (e.g. lifelong learning policies). HEIs have primary responsibility for the quality of their provision and its assurance in the EHEA (ESG, 2015). Such an endeavour would follow European trends, whereby a number of agencies have gradually moved from an approach focusing solely on programmes to a combined approach, or even an approach focusing solely on institutions[1]. More recently, the European Commission formulated recommendations for the 27 EU Member States that, 'once higher education institutions have a robust internal quality assurance, [they] move towards institutional approach for quality assurance'[2].

In the end, adequate national regulation policy and external quality assurance procedure should facilitate the implementation of quality-assured FLPs while granting HEIs the autonomy to develop their own FLPs. This would, in turn, mitigate the quality assurance fatigue experienced by HEIs and agencies.

Suggestions for actions to support effective quality assurance of flexible learning pathways
Ministries
- In national regulations, define FLPs in a broad sense to safeguard the autonomy of higher education institutions in implementing them.
- Include FLPs in the national qualifications framework and foster FLPs across different tertiary education sub-sectors

Agencies
- Place a stronger emphasis on FLPs in institutional-level reviews, treating them as a core institutional policy rather than quality-assuring all aspects of FLPs at programme level.
- Contribute to knowledge-sharing on good practices related to the quality assurance of FLPs (e.g. thematic analysis based on external reports; thematic evaluations on specific aspects of FLPs…)

Higher education institutions
- Include flexible learning pathways in the institutional strategy, supporting their implementation with targeted policies disseminated both at institutional and programme level.

- Work with all stakeholders to define clear indicators with which to monitor and continuously support the development of FLPs, ensuring they are fit for purpose.

In addition to these suggestions, it is important that countries continue to implement the Bologna tools at a national level, as these tools also support trust and the development of FLPs at a European level. This could be achieved through flexible learning in joint programmes and by ensuring flexibility in the labour market across EHEA countries, while making sure that the needs of students are met and that adequate quality assurance is in place.

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[1] ENQA (2008): https://www.enqa.eu/wp-content/uploads/ENQA-workshop-report-9.pdf
[2] European Commisison (2024): https://ehea.info/Immagini/the-european-higher-education-area-in-2024-EC0224018ENN1.pdf