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Paper

Quality assurance of work-based learning in higher education: policy design lessons from Romania's dual studies framework

Abstract

Work-based learning (WBL) is attracting growing policy attention across Europe, yet quality assurance (QA) of WBL in higher education remains in many aspects underdeveloped: in a WEXHE project survey,

only 5% of agencies had criteria or methods specific to it (Gourdin, Homan & Wagenaar, 2019). Romania introduced WBL through the establishment of 'dual' study programmes in the revised law on higher education of 2023, expecting that half of the student workload is conducted in cooperation with employers in their premises. As the Romanian law requires every programme to pass ex ante programme-level accreditation before students are enrolled, the Romanian Agency for Quality Assurance in Higher Education (ARACIS) introduced specific standards for the QA of WBL in the new 'dual' programmes. This paper looks at the challenges identified and reflections after the first round of authorisations in Romania and what other systems can learn from it.

We first place the Romanian model among European approaches considering the intensity of WBL. We then analyse the legal framework, the ARACIS specific standards and thirteen external evaluation reports on dual programmes authorised between July 2025 and June 2026. Analysing the reports, we observe that indicators specific to dual study programmes are rarely identified as weaknesses or concerns, with some notable exceptions at the interface between university and employer: how learning outcomes are divided between the two settings, how tutors are prepared, and how the partner's assessment is calibrated.

We conclude with ten challenges and associated suggestions on where QA should focus, given limited resources: adapt requirements to the specificities of dual education; joint committees for consortia; minimum performance standards; appeals; training of tutors and staff; recognition of prior learning; reliable, valid and fair assessment across several companies; communication about dual programmes; planning for partner withdrawal; and keeping final responsibility for academic standards with the institution.

1. Introduction

This edition of EQAF aims to bring to attention how quality assurance can help institutions partner with the world of work, supporting skills, entrepreneurship and innovation. Work-based learning (WBL), both as an approach to learning and teaching and as a structural choice in designing study programmes, is a test case for that question.

Policy interest in WBL has several drivers, not least youth labour-market transitions, demands for practice-oriented graduates and the need for transferable competences (European Commission, 2013; Council of the EU, 2018). The literature of quality assuring WBL, however, is still dominated by vocational education, and the QA of WBL in higher education is nascent. One of the main sources is WEXHE (Integrating Entrepreneurship and Work Experience into Higher Education) project, which ran between 2017–2019 by the University of Groningen, ENQA, EURASHE and other partners. ENQA's review within the project found no European-wide approach (Kerber & Gourdin, 2018), and a survey in the same project found criteria or methods specific to WBL in only 5% of the agencies surveyed (Gourdin, Homan & Wagenaar, 2019).

Romania introduced WBL in higher education in 2023 through 'dual' study programmes, and from the outset required them to be quality assured at programme level. This paper examines the design problems that arise when QA must cover programmes in which half of the workload is delivered in

collaboration with employers, and what other systems can learn from the Romanian answer. Three questions guide it: (i) what do European instruments expect of QA at different intensities of WBL? (ii) what do Romania's rules require, and what did evaluation panels find when they applied them? (iii) which of those findings are applicable beyond Romania?

Section 2 of the present paper sets out the European context, Section 3 the Romanian framework and Section 4 the evidence from evaluations; and finally Section 5 sets out ten challenges and where QA could prioritise its efforts. The Romanian case rests on (i) the legal framework and the ARACIS specific standards for dual studies;[1] and (ii) the external evaluation reports of thirteen dual programmes approved under the new ARACIS methodology[2] between July 2025 and June 2026, in which requirements specific to dual provision were separated from those that apply to any programme.

2. Work-based learning in Europe: forms, intensity and QA approaches

Forms and intensity. There is no agreed definition of WBL. QAA (2018) speaks of 'authentic structured opportunities for learning' in a workplace, or designed to meet a workplace need, involving *learning through, for and/or at work,* and arranges provision on a continuum from live work-based projects through assessed work experience and placements to work-integrated higher education and higher education apprenticeships. Brennan and Little (1996) show how much one label can hide: WBL varies in the status of the learner, the focus of the curriculum, who controls its content, how far its assessment counts towards the award, and who supports the learner. The last three issues decide who 'answers' for what the student learns, and therefore determine the scope of what QA has to examine. In this paper, 'intensity' means how much of a programme is delivered in cooperation with the employer and how far the employer shapes its content and assessment. Which form a system adopts is a policy choice with various trade-offs (Sweet, 2018), shaped by its labour market, its legislation on contracts and workers' rights, incentives for employers and prior experience of HEIs in working with companies.

Why systems choose it. As every programme is expected to foster employability, the choice of WBL is a matter of intensity and design more than of purpose**.** Sweet (2018) lists what learners, governments, employers and institutions expect to gain: learners acquire relevant skills and contacts with employers who may hire them; employers get more productive and innovative workplaces; systems get skills closer to real work, employer involvement in design and management of programmes, shared costs and the use of employer equipment. QA therefore has to combine requirements on inputs (such as qualified in-company trainers), processes (such as joint committees) and outcomes (relevant competences), and

[1] Law no. 199/2023 on higher education (Legea învățământului superior nr. 199/2023), Official Gazette of Romania, Part I, no. 614 of 5 July 2023: https://legislatie.just.ro/Public/DetaliiDocument/288438. Order of the Minister of Education no. 4275/2024 approving the Methodology for the organisation and functioning of dual higher education (Metodologia de organizare și funcționare a învățământului superior dual), Official Gazette, Part I, no. 430 of 10 May 2024: https://www.edu.ro/sites/default/files/OM_4275-2024.pdf. ARACIS, Specific quality standards for the dual form of organisation of bachelor's and master's study programmes (Standarde de calitate specifice pentru forma de organizare dual a programelor de studii universitare de licență/masterat), Council Decision no. 171/H/21.05.2024: bachelor's https://www.aracis.ro/standarde-specifice-invatamant-dual-licenta/, master's https://www.aracis.ro/standarde-specifice-invatamant-dual-masterat/.

[2] Methodology for the external evaluation of the quality of education in higher education (Metodologia de evaluare externă a calității educației în învățământul superior), Government Decision no. 962/2024, Official Gazette no. 807 of 13 August 2024: https://www.upt.ro/img/files/legislatie/2024/HG_962-08.08.2024_metodologie-evaluare_calitate.pdf.

to ask whether the burden of requirements is proportionate, so that institutions do not have to delegate responsibilities for the design and delivery of their own programmes.

How agencies approach it. ENQA's survey of 40 agencies within the WEXHE project found three postures: some have dedicated approaches to WBL, others verify only that institutions' internal QA covers WBL, and others do not see it as part of their mandate (Kerber & Gourdin, 2018). The first is most visible at the apprenticeships end of the continuum. Quality and Qualifications Ireland (QQI) expects, for apprenticeship programmes, a continuous record of on-the-job experience, external observation of the apprentice, and assessment that integrates on-the-job and off-the-job learning rather than merely pairing them. The European Council on Chiropractic Education (ECCE) accredits chiropractic programmes and checks clinical placements on site: patient numbers and case variety, records, supervision ratios and the exit examination. Most agencies cover WBL only when it is integrated in the curriculum, and look for evidence in institutional procedures: how learning outcomes are formulated, protocols for assigning placements and tutors, qualifications of company instructors, assessment rules and cooperation agreements. The UK Quality Code takes this line, placing ultimate responsibility for standards on the degree-awarding body wherever learning takes place and whoever provides it.

The high-integration end of the continuum. In the Basque Country, where dual degrees are also defined in legislation, the quality assurance agency Unibasq requires that 25–50% of ECTS credits be earned in the company; that competences be allocated to the subjects, and to the setting in which they are acquired; that tutors meet a profile of qualification and experience (those without tutoring experience take a 15-hour course); and that a company tutor sit on the final-project panel (Unibasq, n.d.). In Germany, the Science Council recommended that at least half of the study time in dual programmes be spent at the higher education institution (Wissenschaftsrat, 2013). The 2018 Council Recommendation on quality and effective apprenticeships, which concerns mainly vocational education, sets a threshold from the other side: a substantial part of the apprenticeship, 'meaning at least half of it', should take place in the workplace (Council of the EU, 2018). Read side by side, the two thresholds leave one value that satisfies both, an equal split, which is what Romania's legislation prescribes (see below).

Reference models. WEXHE's QA model separates content (is the intended qualifications framework level of learning delivered?) from process (are the conditions for learning in place?) and maps onto ESG 1.1–1.3 three requirements: WBL in institutional policy, with responsibilities defined in formal agreements; design together with employers, with a clear division between classroom and workplace learning; and student-centred assessment and fair complaints procedures (Gourdin, Homan & Wagenaar, 2019). The project's guide for placements (Wagenaar & Svetlik, 2020) turns this into design rules for a work-based module that carries ECTS credits: a size of 10–30 ECTS (smaller units are an introduction to the workplace rather than a placement), learning outcomes matched to the credits and used as the list of what is assessed, equal weight for the grades of the workplace supervisor and the university mentor, at least three meetings between the supervisor and the mentor, and trained workplace supervisors.

European frameworks in development. Nine universities in the EU4DUAL alliance have drawn up a Dual Higher Education Framework with seven dimensions of programme design. They piloted it in joint dual master's programmes in which at least 20% of studies are work-integrated, and they are working on a peer-reviewed quality label whose criteria have not been published yet. The alliance's 2026 policy brief says that no shared European reference framework for dual higher education exists, and asks Member States to set accreditation criteria for dual programmes. However, none of its recommendations is addressed directly to QA agencies (EU4DUAL, 2026). German research shows what integration can mean in practice: in a study of 152 dual programmes, Mordhorst and Jenert (2022) found a range from parallelism, through organisational linking, to full curricular integration, and problems in meeting the integration standards set at policy level.

3. The Romanian framework for dual studies

Law 199/2023 (arts. 90–96) defines dual higher education as a form of on-campus full-time study in which responsibilities for learning, teaching, research and assessment activities are shared between the higher education institution (HEI) and economic operators (OE), a term that covers companies and also public authorities, chambers of commerce, employers' associations and similar partners. Many of the first programmes were designed within regional consortia financed by Romania's National Recovery and Resilience Plan (PNRR), which also funded integrated dual campuses built with companies and local authorities.[3]

Two instruments turn the law into operating rules: secondary legislation - Ministerial Order 4275/2024, which regulates dual higher education in more detail, and the ARACIS specific standards of May 2024, applied together with the cycle-level framework of standards and indicators. Institutions may admit students to a dual programme only after it has been positively evaluated by ARACIS . Table 1 sets out what the two texts require.

[3] Ministry of Education, press release of 31 March 2023 on the implementation of Component 15 (Education) of the PNRR, investment I6, 'regional consortia and integrated professional campuses': https://www.edu.ro/comunicat_presa_22_2023_precizari_implementare_proiecte_PNRR.

Table 1. Requirements for dual programmes in Order 4275/2024 and the ARACIS specific standards

Theme	Order 4275/2024	ARACIS specific standards (2024)
Definition	Dual higher education is defined in law: Dual higher education is a form of education in which responsibility for learning, teaching, practical training, research and assessment is shared between the accredited higher education institution and business organisations. *Learning through work* is not defined.	Learning through work takes place through actual work activities carried out at the OE, which may lead to real goods, services and/or works. Activities of learning through work allow students to experience real work contexts, in which they can apply the knowledge and skills acquired through learning-teaching, applied or research activities in the university setting.
Partnership	• Consortia of HEIs and OE; partnership contract covering from admission to graduation (arts. 3, 7, 8–11) • OE must be able to act as employer and declare an interest in hiring graduates (art. 6) • OE contributes an agreed amount to facilities (art. 10)	• Same requirements; • Graduates are offered the possibility of employment, on criteria set by the OE.
Admission and capacity	• Intake set by the HEI within the capacity assessed by ARACIS, based on OE requests; OE representative on oral or online admission committees for the programme it requested places in (art. 17)	• Admission methods should assess motivation for dual study; • Maximum intake takes account of staff and tutors, study groups and facilities; one coordinating academic staff per work-based study group, whose size is that of laboratory or project groups in full-time programmes (by field and cycle).
Workload and WB learning	• Workload for learning-teaching and for WB learning shared equally, estimated and expressed in ECTS (art. 7(2)) • Learning through work is the OE's responsibility alone, under the standards and the study plan (art. 13).	• HEI organises learning-teaching (as course, seminar), practical activities (as laboratory, project), research (graduation project) and assessment activities; OE organises WB learning (as practical activities, laboratory, project or graduation project research) and assessment activities; • Credits stated separately for activities organised by HEI and OE within a discipline • Students have the right to be trained for WB learning.
Learning outcomes	–	• HEI defines programme learning outcomes after consulting OE; • For each discipline, which expected outcomes are acquired academically and which at work is chosen on an analysis of staff, pedagogical methods, infrastructure and workload, and decided jointly; a committee of all parties is recommended; • Both settings must form 'a unitary and complete learning experience', each adding to and completing the other's learning outcomes.
Assessment	• OE takes part in continuous assessment of WB learning and in the final examination (arts. 8, 18) • OE representative on final-examination committees (art. 18(2))	• Continuous assessment and final examinations organised by the HEI with OE participation; • WB learning assessed by the coordinating academic staff with the tutor, usually by a practical test in which students carry out activities leading to the products, services or works they are trained for; • Failed or missed work-based activities can be redone.
Students	• One tripartite study and practical-training contract (art. 5) • Work seniority recognised for learning through work (art. 15) • Tax incentives for OE and tutors (art. 16)	• Free occupational health and safety coverage, insurance and equipment • If available, scholarships from OE at least equal to the HEI's

Theme	Order 4275/2024	ARACIS specific standards (2024)
Tutors and coordinating academic staff	• OE designates tutors, who answer for WB learning through work; they hold a qualification at least at the level of the programme (art. 14) • HEI designates a coordinating academic staff for each study group (art. 14)	• Tutors: same qualification requirement; at least two years' work experience in the field of the discipline(s); trained by the HEI; • Tutors evaluated by students and the coordinating academic staff; HEI may ask for their replacement.

Where Romania sits. Read against the European range in Section 2, the Order puts Romanian dual programmes at the demanding end: half of the workload sits with the employer, the upper limit of Unibasq's bracket and the minimum the Council sets for apprenticeships. Unlike a typical apprentice, the dual student remains a student, bound by one tripartite study and practical-training contract with the university and the employer (arts. 5 and 12). A student may in addition be employed by the partner (art. 16(4) refers to 'students employed by economic operators') and then holds an employment contract and is paid a salary like any employee.

4. Analysis of the external evaluation reports for ex ante accreditation

Data and method. The procedure requires that a panel of four (a coordinator, two academic experts and a student) reads the university's self-evaluation report, visits the institution and, in at least six of our thirteen reports, the partner's premises, and assesses 21 indicators as fulfilled, partially fulfilled or not fulfilled: six on institutional capacity, ten on educational effectiveness and five on quality management. It may add recommendations to any indicator. No panel includes an employer-side expert, and there is no separate set of dual indicators: the dual standards work through the generic ones. By June 2026 ARACIS had approved 68 dual programmes, 55 under the previous methodology and 13 under the new one. We analysed all of the later, offered by five universities: ten in engineering and three in business.

What the assessment of indicators shows. Of the 273 indicator assessments (21 indicators for each of the thirteen programmes), 254 are 'fulfilled', 19 'partially fulfilled' and none 'not fulfilled'. Only three of the 19 partial assessments refer to a requirement specific to dual provision: institutional regulations that did not yet cover dual activities and too few tutors for the planned WB learning (both in one report), and discipline sheets not adapted to dual provision. Twelve of the 19 fall under the indicators on learning outcomes.

What the recommendations show. Panels attached most remarks specific to dual programmes to indicators they assessed as 'fulfilled'**.** Table 2 counts the reports in which each topic appears and places it under the ESG standard it belongs to; Table 3 quotes some relevant examples in this regard.

Ten of the thirteen reports offer recommendations on tutors: how many there are, who selects and prepares them, whether their hours and names appear in the plan and discipline sheets. Three ask the university to prepare the partner's tutors; in one of them the tutors already held national certification and in-house training, yet the panel applied the standard's wording that the university should train them. Assessment of WB learning and the evaluation of staff draw recommendations in six and four reports.

Table 2. Gaps specific to dual programmes recorded in external reports, by number of reports

Gap recorded by the panel	Reports	ESG 2015
Assessment of learning through work not specified	6	1.3
Institutional regulations do not cover dual provision	5	1.1, 1.4
Staff evaluation omits partner tutors	4	1.5
Admission does not reflect dual specifics	4	1.4
Tutor preparation by the HEI not documented or planned	3	1.5
Too few tutors or partners; no tutor selection procedure	3	1.5
Tutors' hours, names or input not visible in plan, sheets or laboratory guides	3	1.2
Learning outcomes not adapted for the dual setting	1	1.2

Table 3. What panels wrote: examples from the reports[4]

Topic	Panel's finding or recommendation	Indicator, assessment
Regulations	The university 'has not drawn up regulations for organising and running the programme in the dual system'. Recommends adding dual aspects to the rules on admission, students' professional activity and completion of studies.	A.1.1.1, partially fulfilled
Tutor capacity	Four tutors from the single partner, 'insufficient' for 50 disciplines with learning through work in three subgroups each. The panel proposes 30 places instead of 45, 'given the human resources available at the economic operator'.	A.3.1.1, partially fulfilled
Sheets copied	The curriculum 'does not differ' from the conventional programme's and the sheets 'are identical', 'although the content should be personalised'. Lecturers had not defined how to adapt 13 first-year laboratories.	B.1.1.1, partially fulfilled
Tutor preparation	No mention of preparation of the partner's tutors by the university, as the standards require, but they hold national certification and in-house training. Recommends university courses for them.	A.3.1.1, fulfilled
Assessment and staff evaluation	The same two recommendations in four reports: adapt assessment of learning outcomes to dual education 'by correlating mid-term and final examinations with the practical activities carried out in the professional environment'; extend staff evaluation to the partners' tutors.	B.5.1.2, C.4.1.1, fulfilled
Admission	The partner would like an interview; the faculty wants admission tests run with the partner 'to the extent that the updated national legislation allows admission procedures to be differentiated'.	B.7.1.1, fulfilled

The division of learning outcomes is the hardest requirement to verify. The discipline sheet should show where university and employer each contribute. In one report, however, the plan and sheets did not differ from those of the conventional programme and lecturers had not yet defined how to adapt first-year laboratory work to the partners' equipment, and the tutors expected to do the adaptation had no time for it. The final recommendations in this case asked the programme to indicate 'which learning outcomes are acquired in the academic context and which through practical activities at the economic partner'.

The equal split itself is recorded in credits (120 + 120 ECTS in one report, 'shared equally' in two) or, despite the standards, in hours (908 against 890 in a business programme). Two study plans show how far the readings diverge: a three-year business programme gives the partner 79 of 180 ECTS (44%)

[4] Quotations from the reports are our translation from Romanian.

although hours are almost equal, and a four-year engineering programme gives it 123 of 240 (51%), none in the first year and 78% in the fourth.

5. Challenges and where QA should look

The reports and our experience of the first programmes point to ten challenges and associated suggestions.

Activating joint committees for the consortia. The ARACIS standards only recommend a committee of all parties to divide learning outcomes, and the Order leaves the rest to the partnership contract (art. 3). Nine of the thirteen reports place the programme in a consortium; however, none mentions a joint committee or its rules. Based on the existing reports, it seems that QA should increasingly look not only at who met to plan the programme, but also at how the committee decides, what happens to students if a partner withdraws, and why a company would want to join.

Determining minimum performance standards for work-based courses. Employers have the know-how but seldom the language of learning outcomes, or the habit of tying activities to outcomes and assessment. Universities are not always better placed: three reports found the minimum standard missing or too general. QA could ask for a matrix, written by both sides, that split the workload in ECTS and gives for each learning outcome the setting, type of activity, pedagogical approach, assessment and minimum level.

Appeals procedures for work-based courses. In the reports, the general rules for other courses let a student request the re-evaluation of a written paper and appeal to a special committee. Three reports cite a dual-studies regulation with provisions on contesting evaluations, but none says how a mark given at the partner is contested, who hears the appeal or what record of the test exists, and what happens if tutor and coordinating academic disagree. While the same general rules could arguably apply, they are not adapted to the particularities of WBL assessment.

Training tutors and preparing staff to articulate the division of learning outcomes. The Order makes the university responsible for training and evaluating tutors (art. 9), and ten of the thirteen reports have recommendations on tutors. Lecturers need preparation too, and QA could look at what the preparation contains and whether lecturers and tutors agreed the split before the first intake.

Lack of recognition of prior learning. Some dual students already have work experience, but recognition of prior learning is not practised in Romanian higher education. QA could ask how programmes will recognise prior work-based learning against the same outcomes (ESG 1.4).

Reliability, validity and fairness of assessment, particularly if more than one company is involved. WB Learning is assessed by the coordinating academic staff and the tutor, usually, under the standards, through a practical test at the partner. In one report the specific aspects of the test were not defined in the regulation or the sheets; we found no mention of common criteria, moderation or comparison across partners. QA should look at whether the test is valid (it measures the outcome), reliable (tutors and companies mark alike) and fair to students at different partners.

Communication about what a dual programme is and is not. As Section 3 shows, a dual student remains a student, bound by a tripartite contract, and may also be employed by the partner, which declares an interest in hiring graduates, not a commitment (Order, arts. 5, 6 and 16(4)). Candidates must be informed of the main contract clauses before admission (art. 12(3)), yet two reports list weak promotion among a programme's weaknesses. QA could check what candidates and companies are told and whether it is public before admission.

Applying the specific standards through one set of indicators. A single set of indicators, applied by cycle and form of organisation, keeps dual programmes on the same footing as others and avoids a parallel bureaucracy, but gaps specific to WBL go unaddressed unless experts apply the specific standards consistently and adjusted to the specifics of WBL. Analysing the reports, we identify four indicators which would require particular attention for dual degrees: regulations that cover dual provision; tutor capacity and preparation; division of learning outcomes between the settings; assessment at the partner. Training for experts in the specific standards would help, as would an expert representing employers on panels.

Planning for what happens when something goes wrong. None of the thirteen reports asks what happens to the students if a partner withdraws, or whether a step-in plan (an alternative partner, or the return of the workload to the university) is in place.

Keeping final responsibility for academic standards with the institution. The university keeps the award, the admission rules, the organisation of assessment and the right to ask for a tutor's replacement, while partners co-design the plan, co-assess learning through work and sit on committees. QA should check that employer influence is real and that outcomes are chosen by analysis, not for the convenience of one partner. Copying the conventional programme's sheets is the opposite failure: the employer is present in name only, as in the parallelism described by Mordhorst and Jenert (2022).

6. Limitations

The evidence is ex ante: reports assess plans, partnerships and capacity at authorisation, not delivery, and the first dual cohorts will not graduate before 2027.

7. Questions for discussion

1. What are the main challenges facing WBL in your system, and which of them could be tackled through QA?
2. What examples of good practice in QA of WBL, especially of the interface between institution and employer, could other agencies adopt?
3. Should dual-specific expectations have indicators of their own, or are generic indicators enough?
4. How can QA frameworks maintain institutional autonomy while enabling employers to play a genuine role in programme design, delivery and assessment?
5. How can WBL support flexible learning pathways?

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