ESU's position on the Council Recommendation on Quality Assurance and Recognition

I. General remarks about the spring 2024 higher education package

ESU welcomes the ambitious developments on the topics put forward in the spring 2024 higher education package, especially in the light of creating an enabling framework for a shared understanding and implementation of EEA, as well as the several rounds of consultations organised by the Commission in this regard. Nevertheless, we want to draw attention to the fact that essential pieces of the puzzle are still missing and without which a well-rounded and functioning EEA cannot be achieved, such as the **inclusivity framework** and a **framework for adequate student participation.** These topics are sine-qua-non conditions for an EEA that delivers for students.

We highlight that the documents within the spring package, as goes with the whole EEA, should have as a **starting point the policies, practices and commitments within the Bologna Process** and should aim to support and enhance the implementation of the Bologna Process, without creating diverging or parallel practices. This is especially important regarding commitments linked to quality assurance, recognition and joint programmes, even more so that for quality assurance an entire architecture and coherent, well functioning system has been built within the European Higher Education Area (EHEA).

Furthermore, a balance must be struck in terms of the scope of intervention of the spring package documents. On one side, it is expected that additional emphasis is put on elements related to transnational cooperation, where EU added value is most obvious, and to instruments or initiatives stemming from EEA itself (such as European University Alliances or a common approach to microcredentials). On the other side, the E**EA and the values it underpins must impact and leverage all students and higher education institutions,** irrespective of the place or conditions of study, and as such policy initiatives linked to quality assurance and recognition, academic careers or rules related to joint programmes must be **broadly applicable in all circumstances,** considering the additional need for intervention in relation to what already exists.

Finally, while there may be convergence in objectives among various policy-makers and stakeholders, the ambitions of the proposed initiatives should be complemented by additional effort in getting on board the grassroot

academic communities, aiming to reach a common, more concrete long-term vision of EEA and its initiatives.

These general principles, stemming from previous statements and resolutions adopted by the Board of ESU on the EEA or its components, will guide ESU's contribution below to each of the three components of the package.

II. The Council Recommendation on Quality Assurance and Recognition: the QA dimension

The previous, 2006 Council Recommendation on quality assurance endorses what at that point have been emerging practices which became cornerstones of the European model of quality assurance: the combination between internal and external QA, participation of students, agencies operating independently, publication of results or international participation. The basis of EU action in QA is defined as supporting the development of QA in coherence with activities carried out in the context of the Bologna Process. In this sense, the Recommendation promotes and does not go beyond the European Standards and Guidelines on Quality Assurance (ESGs), while also encouraging the creation of EQAR.

ESU believes that the **underlying principles which stood behind the 2006 Council Recommendation are equally applicable** in present times and should remain the basis of the upcoming Council Recommendation, which must reiterate and call upon the member states the imperative to design national quality assurance legislation which is fully compliant with and enables the adequate **implementation of the ESGs**. Furthermore, the Recommendation should emphasise the necessity to allow higher education institutions to choose any EQAR-registered QA agency to conduct quality assurance reviews, which are accepted on equal basis and without undue burden, while respecting national legislation. Apart from reiterating these already existing commitments, we believe the Recommendation should highlight the importance of **maintaining quality assurance processes up-to-date and fit-for-purpose** in conjecture with evolving challenges, trends and initiatives, such as **defending academic integrity and fostering inclusion**, maintaining the quality of education for **new and innovative types of provision** and furthering the integration of **green and digital skills,** as well as **soft and transversal skills**.

The added value of EU intervention in this broad context would be in **supporting the EHEA framework,** including the ecosystem around ESGs, through analysis, peer support, opportunities for cooperation or funding, **without any parallel systems. ESU is against the notion that all member states should invariably move towards exclusively institutional accreditation**, despite its obvious advantages for international cooperation, e.g. for setting up joint programmes. By treating a specific problem with a general, one-size-fits-all solution, the proposition would not only decrease flexibility, but also ignore different realities in member states. In several countries where programme-level accreditations or regular evaluation exist, our national unions of students emphasise that they are still relevant for their national context.

A different rationale applies for microcredentials, where recommending the integration of the QA of microcredentials in institutional internal and external QA procedures would be welcomed as the contrary would be difficult to imagine. The Recommendation should endorse the thesis, as reiterated by the E4, that the ESGs are applicable to microcredentials as well, with adaptations needed in consideration of their unique nature. Guidance is needed at national level to ensure that the specificities of quality assuring microcredentials does not go beyond practical and rational adaptation to waiving requirements that are put in place to defend students' interests.

The novel area to be covered by the upcoming Council Recommendation is on the quality assurance of European University Alliances. **ESU believes that Alliances should be both internally and externally quality assured.**

While the two can be designed in tandem, the biggest priority now should be the creation of an authentic internal QA system at the level of Alliances. In several cases, the 'quality assurance' of the Alliances actually reflects the project-management paradigm, illustrating the requirements for quality assuring a project, not an institutionalised form of cooperation and its provision. **Alliances should be supported to create meaningful criteria, QA units at alliance level** that go beyond a gathering of QA units or project officers at university level and ensure **meaningful student participation** in the creation and implementation of QA policies at joint programme and alliance level. So far the participation is ostensibly lower than in other QA proceedings, which is alarming and goes

against one of the fundamental principles of the European model of quality assurance.

The development of quality assurance processes for the European Universities alliances has been tackled in the [Resolution on Strengthening student representation within the framework of the European Alliances of Higher Education Institutions](#).

In the resolution, ESU highlights that the Alliance-level QA system could neither replace, nor be an extension of the institutional QA managements and systems at higher education institution level. As such, a distinct system at Alliance-level needs to be built together with stakeholders.

The internal QA system should include students at all steps, both as experts in the QA bodies, nominated by the student body at Alliance level, and as experts of their own learning through input via surveys, focus groups, student partnership programme etc. It is important that **Alliances put in place systems for electing student representatives at programme-level,** so that they can advocate for the needs and interest of students in relation with the content and quality of the joint study programme.

The possible avenues for the external quality assurance of alliances have been addressed by ESU in our [QA FIT paper](#). One of the questions addressed to our national unions of students (NUSes) focused on different possible approaches for setting up an external QA evaluation system for European university alliances. 59% of NUSes agreed that there is a need for an external quality assurance system of the Alliances. On the other side, a clear message is sent in terms of the fact that the **alliance-level evaluation could not and should not replace national quality assurance procedures.**

What do you think about the following statements related to quality assurance of university alliances?

Legend: I agree · I do not agree · I don't know

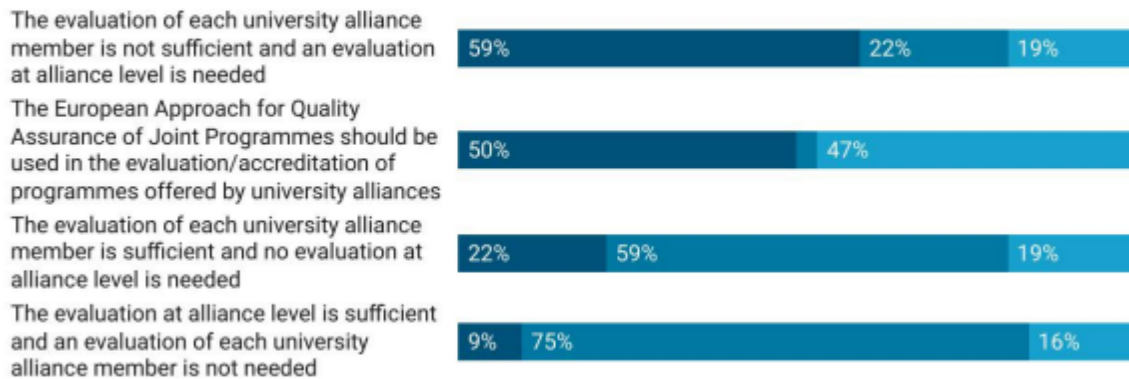| Statement	I agree	I do not agree	I don't know
The evaluation of each university alliance member is not sufficient and an evaluation at alliance level is needed	59%	22%	19%
The European Approach for Quality Assurance of Joint Programmes should be used in the evaluation/accreditation of programmes offered by university alliances	50%	47%	
The evaluation of each university alliance member is sufficient and no evaluation at alliance level is needed	22%	59%	19%
The evaluation at alliance level is sufficient and an evaluation of each university alliance member is not needed	9%	75%	16%

Chart: ESU · Source: QA FIT · Created with Datawrapper

Source: QA FIT publication, ESU

For setting up the process of the external QA for Alliances, **a starting point could be the framework piloted within the EuniQ project,** however this cannot be applied directly and necessitates further revision. The framework should apply to any type of alliance of HEIs, not only European University Alliances.

ESU proposes that the Council Recommendation includes building blocks or the contours of the content of the external QA system, including **elements related to strategic planning, governance, procedures related to joint activities, including joint programmes, stakeholder participation** etc.

While the external evaluation of alliances is deemed relevant, there has been no prospecting so far in the survey on what the possible outcomes of such evaluation should be. The possibility of the evaluation posing no 'formal' consequences could be imagined, thus being recommended and in the future required exclusively for enhancement. It can also imply a requirement for external QA with consequences not related to giving the right to issue diplomas, but others such as funding eligibility from Erasmus+ programme for already established Alliances.

One consequence of undergoing an external QA procedure of an Alliance should be giving the right to waive the evaluation of joint programmes. This would further incentive external QA for Alliances where at least one member state of a

member HEI has a requirement for programme-level evaluation applying also to joint programmes.

One aspect to acknowledge is that considering the potential types of international cooperation, this would create a rather strange situation: for an Alliance there would be no need for external evaluation of the joint programme, despite a joint programme potentially being offered only by some of the Alliance members together, while for two higher education institutions willing to create a joint programme, not being inside an alliance but respecting all the substantial conditions required for a cooperation within an alliance, they would not receive the same treatment and would need to externally evaluate the joint programme.

In any case, in order to create this derogation, on the premise that programme-level evaluation exists in one country under discussion, this should require **a system of external QA for alliances which is developed enough to incentivise renouncing the requirement of externally evaluating joint programmes**, and would nevertheless still require some national legislation to apply for the joint programme.

Furthermore, it is important to acknowledge that this procedure would only waive the necessity to externally evaluate joint programmes or other joint educational activities, not waive any national requirements, which (at least some) still need to be in place. Clear guidelines need to be in place to determine what falls under the scope of EQA of Alliance and the scope of national QA, and the definition of the joint education activities falling under the scope of the EQA should be narrow and concise.

For the potential link between external QA of Alliances and European degree (label), see ESU's position on the European degree.

III. The Council Recommendation on Quality Assurance and Recognition: the recognition dimension

Achieving automatic recognition of qualifications is yet another commitment taken by ministers in the European Higher Education Area, which gained additional traction with the adoption of the 2018 Council Recommendation on

promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad.

According to the Lisbon Recognition Convention Monitoring Report, published in 2022, 'Some 12 respondents (DE, FI, HU, IT, MD, MK, MT, PL, PT, TR, SM, UA) stated that automatic recognition has been implemented nationally'. Out of those, 7 are EU countries (however some did not answer the survey). In the Study on implementing the 2018 Council Recommendation, published by ICF, 3s and CHEPS, in terms of automatic recognition of qualifications 4 EU countries were flagged as having AR fully implemented, with 8 near completion, while for automatic recognition of learning periods abroad only 4 EU countries were categorised with AR fully implemented.

ESU adopted a position on recognition and automatic recognition in the [Resolution on the Development of Automatic Recognition Processes in Europe](). ESU sees **automatic recognition as a pillar for free movement of persons and an enabler for credit or degree mobility,** and as such supports the objectives of mobility, such as internationalisation and intercultural understanding. **Automatic recognition is essential also for the visibility, transparency and permeability of learning pathways.** This is especially important for short-cycle HE, level 5 EQF and VET, where AR progress is slower than traditional, long programmes (bachelor, masters, PhD).

ESU believes that the Council Recommendation should reiterate that automatic recognition should be a reality within the whole European Higher Education Area, that member states should follow-up on the commitment and **emphasise quality assurance as the building block in this regard**. A European Education Area cannot be consistent without seamless mobility based on automatic recognition and investing resources into adapting legislation and supporting recognition bodies for the full implementation of automatic recognition and building mutual inter-institutional trust.

We can see that some countries have not pushed forward the agenda of automatic recognition from the European policy to national legislative framework and practice, although the underlying conditions for automatic recognition are in

place. As the tools exist (including ESG-compliant QA, the use of a three-cycle higher education system etc.) at the European level, the issues with the progress toward achieving automatic recognition are not conceptual.

This may point into the direction of either lacking understanding of or not trusting the effectiveness of the current tools, but also the need for a **mentality shift from expecting uniformity instead of comparability in order to support and enforce AR.** ESU supports the idea that this could be solved by **shifting the procedure of automatic recognition from institutional to national level,** without ignoring the root causes of this potential mistrust, such as insufficient communication or proper use of learning outcomes and qualifications frameworks or the guarantees that the ESGs are uniformly applied as a minimum set of criteria across EHEA. **One way to increase the communication is through strengthening the visibility of DEQAR.** The Council Recommendation should emphasise the importance of DEQAR and invite the Commission to support maintaining and further development DEQAR.

The Council Recommendation should reinforce these solutions and call for the need of increased support for training and cooperation between stakeholders, including between different silos, such as quality assurance and recognition. It should also emphasise the **role of data collection and monitoring, in order to create evidence-based policies.** Unfortunately only 53% of HEIs store and collect data on recognition decisions, thus hampering the possibility to fully grasp the scale of institutional-level AR. In this sense, QA has a dual role to play: it is a basis for AR, but can also monitor how AR is implemented at institutional level, where applicable.

Expecting European Universities Alliances to be the ones to further the achievement of automatic recognition would misplace the path to follow. Automatic recognition should have long been a reality for all students in the entire EHEA and all the conditions are in place for it.