European Students' Union (ESU)
Fighting for students' rights since 1982

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Policy paper on Quality of HE 2021

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INTRODUCTION

High quality higher education is of the utmost importance for students, institutions and society. An education of high quality provides the right tools for students to meet future challenges. A high quality higher education system is characterised by removing all obstacles to access, ensuring progress and completion for all students, implementing a student-centred approach to learning and teaching, and fairly assessing students. This system must also be braced by adequate student support services; ensuring links between learning, teaching and research activities; individual, social and civic training for responsible and active citizens; mobility opportunities; artistic and academic freedom; interdisciplinary, multi-disciplinary and cross-border programs. It is important to always consider that the opportunity to study and learn of everyone also depends on their economic situation and mental health. That is why every university cannot fail to provide adequate services to support every student.Students in this system are considered full members of the academic community and competent, constructive partners and stakeholders.

ESU believes that the quality of higher education should be one of the highest priorities in the debates within the European higher education society, as well as it should be accessible and enhanced at the institutional and programme level to ensure the best possible conditions for the entrance and completion of higher education.

Sadly, the concept of excellence in higher education is often misused to refer to so called 'elite' programmes and centres, which focus on a small number of individuals perceived as talented and institutions regarded as of high quality or prestigious. ESU believes that an open knowledge-based society will not be established with this concept of excellence that can only be achieved through stronger competition, but should be based on cooperation of all stakeholders, ensuring them equal conditions in access to any resources.

Every student should have the possibility to completely utilise their own intellectual potential without being limited by restrictive learning programs. ESU opposes any educational system which separates different levels of perceived talents within higher education. We stress the fact that all students

should be able to be academically uplifted from the position they find themselves in.

The following policy paper consists of ESU's position on what is being considered as high quality education from students' perspective, taking into account the core element of education related to the delivery of learning and teaching, methodologies and its organisation, through the supporting agendas and tools set within the political framework of the Bologna Process and the established and system of Quality Assurance across the European Higher Education Area.

Student Centered Learning

- Student-Centered Learning as a concept should regain its visibility and be translated onto new educational approaches, different modes of learning delivery and be constantly adapted to the needs of learners;
- Flexible learning paths and education which fit for societal needs are the key to achieve modern education;
- Learning outcomes should accommodate multiple purposes of higher education, including, but not limited to, developing a broad and advanced knowledge base, critical thinking and social skills;
- Digitalisation of education is not a goal in itself but can be used as a means to achieve other goals such as raising its accessibility, quality and internationalisation.

Learning and Teaching

The paradigm shift towards a student-centred learning (SCL) approach relates to both a mind-set and a culture within a given HEI. It is characterised by innovative methods and interaction between teachers and students to support the achievement of intended learning outcomes, where the students are viewed as corresponsive and active participants in their own learning process.

In the more traditional teacher-centered learning & teaching methods higher education system, unfortunately still present in some cases, study programmes, courses or modules, learning and teaching methodologies, as well as student assessment, have been predominantly designed, organised and carried out from a teacher's perspective around the question of which issues should be taught to students

Through the use of active learning and linking learning and teaching with research, students develop transferable skills, such as analysing, problem-solving, critical and reflective thinking, while being a truly engaged partner in all educational processes. These skills can be further developed through internships, which offer unique opportunities for students to apply them to issues beyond the academic realm. Furthermore, internships should comply with labour standards and be properly retributed.

Throughout the past decades the term SCL has been widely present in the discourse within the Higher Education landscape. ESU believes that this term should not only be a phrase visible throughout the discussion on Learning and Teaching, its policy and organisation but should regain more visibility and be translated to the new challenges of education, its accessibility, different modes of learning delivery and adapt to the needs of learners.

As a supporting mechanism, strategies on student-centred learning should be designed on national and all institutional levels, and the implementation of student-centred learning should be continuously evaluated.

Moreover, ESU emphasizes that a paradigm shift cannot be achieved only by structural measures, but requires adequate funding, continuous staff development, and constant promotion and acceptance by the whole academic community. In order to ensure quality learning and teaching, pedagogical training for teaching staff in higher education institutions should be a requirement and pedagogical competencies should be considered at least equally important to research competencies in the recruitment process. Conversely, the teaching staff should be provided with support systems which include mentoring programmes, peer-to-peer learning and sharing best practices.

Learning outcomes

The concept of learning outcomes is at the core of a student-centred education system. All study programmes and other learning opportunities should be designed with an intention to achieve a set of specific learning outcomes.

Learning outcomes are custom formulated statements that describe minimum requirements of knowledge, skills, competences and attitudes that the student is intended to acquire during the learning activity. Students have to be involved in the process of designing study programmes and defining their intended learning outcomes. Where relevant, external stakeholders should also be consulted in the process of their definition, however, the main responsibility needs to lie within the academic community. Learning outcomes should be formulated in a clear and understandable way, and be made accessible to students and other interested parties.

ESU believes that learning outcomes should accommodate multiple purposes of higher education, including preparing students for active citizenship and their future careers, developing a broad and advanced knowledge base, critical thinking and social skills, as well as stimulating research and innovation. Students should have the option to take courses from other fields of study. Multi and inter-disciplinary approaches should be also used in the curricula design.

Learning outcomes should be clearly and transparently defined within the frameworks of broadly recognised learning and educational theoretical and practical competencies, while taking into account the existence of many different types of learning pertaining to all aspects of human life and development.

Learning outcomes should be constructed in a way that enhances learning experiences by giving the students' the possibility to flexibly define their own learning objectives which can be recognized outside of the curricula. Moreover, the education environment should always leave space for students to realize their personal academic ambitions beyond the intended learning outcomes.

Digital learning

ESU acknowledges the fact that the technological revolution, along with the rapid change in education delivery caused by the pandemic, will majorly impact the education delivery throughout the following years. Digitalisation of education is not a goal in itself but can be used as an instrument to create flexible learning environments to support diverse learning and achieve other goals such as universal accessibility, higher quality of education and internationalisation. Using the right digital tools and methods to develop

higher education can enhance the learning experience for students and provide new insights into teaching for teachers.

Digitalisation has enabled a range of new modes of delivery in higher education. Distance learning, hybrid learning, blended learning, and Massive Open Online Courses (MOOCs) are some examples of the different ways to deliver digital learning to students. While the move towards digital education was already well underway before the outbreak of COVID-19, as was for example reflected in the Paris communiqué[1], the pandemic has forced all teaching staff and students to embrace digital learning and made it a top priority in higher education[2]. It is now more important than ever to secure and guarantee access for all to the quality of digital learning applied in higher education of the 21st century.

Digital learning has the potential to offer many benefits to higher education, e.g. by making it more student-centred, accessible, international, flexible, and well-rounded. However, if it is not implemented correctly, it also has the potential to do harm.

One of the main challenges is a lack of resources dedicated to implementing digital learning. Digitalisation can never be an excuse for reducing investment, and rather requires investment to ensure successful implementation. HEIs need to invest in high-quality infrastructure, and in the broadest accessibility possible for students to attend online classes, especially if they might not have access to technological means and internet connection. Staff and students also need to be trained to gain the necessary skills, both technical and transversal (such as data literacy), in order to be able to make use of the tools constructively. Importantly, staff need to be trained pedagogically to develop high-quality educational content using digital tools and to have sufficient time and space to do this.

In all ways of offering digital education, the support systems that are expected in a physical learning environment also have to be offered to students accessing education partially or fully online. This includes library resources, licensed software, feedback mechanisms, as well as physical and mental support services.

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[1] EHEA Paris Communiqué, 2018, http://ehea.info/page-ministerial-conference-paris-2018
[2] Digitally enhanced learning and teaching in European Higher Education Institutions: survey report, January 2021,
https://eua.eu/downloads/publications/digi-he%20survey%20report.pdf

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In the classroom, it is imperative that the learning & teaching methods that are used simulate interaction, discussion and active participation of students, even if digital learning is used. In addition, in order for MOOCs and all digital education in general to fulfil their full potential, it is necessary to develop new pedagogical methods suitable for this medium, and not only use pedagogies which are being used in face to face education. Caution needs to be exercised to make sure that digitalisation does not lead to an excess of assessments and that ethical standards are followed when using proctoring systems.

Digital tools have also enabled more data to be collected and automatically analysed in education. Students have to remain owners of their data and their privacy has to be respected by design. Whenever data is used in educational processes, such as through learning analytics, including the help of Artificial Intelligence (AI), ethical standards have to be followed, ensuring all students are fully informed and avoiding third party profit of data. The use of data should never diminish the student-centred perspective, but rather has to enhance the quality and accessibility of education. Guidelines have to be established on the ethical and pedagogically supported use of data, and exchange of expertise and training of staff about using data has to be enabled.

Students should be involved in every step of the development of digital learning, including those students who are participating (fully) online. Crucially, institutions should evaluate the effects of digital learning as it has been implemented and hear the students' perspective when doing this. Quality Assurance processes should also be adapted and established in order to effectively assess the quality of digital learning, as we elaborate on further in the section Quality Assurance of Digital Learning.

Educational technology systems need to make sure that the needs of the students leading to high quality of learning are of primary concern, by assuring the students to provide their input, conducting the analysis on the implemented methods and assuring sustainable development of digital technologies in learning provision.

ESU published a Statement on Digitalisation[3] in 2019, which delves deeper into the topics described in this section.

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[3] ESU Statement on Digitalisation:
https://www.esu-online.org/?policy=digitalisation-statement

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Life-long Learning & Flexible Learning Paths

Acquiring knowledge at different points in our lives has come to focus for many. Individual and flexible learning pathways will help shape individual learning ways and adapt the learner to societal needs. Providing possibilities for learning at any point in our lives will be the key element of adapting to the 21st century workforce. Moreover, higher education institutions should provide counselling, guidance, mentoring and tracking to support students' access to, progression in and completion of students' education.

Flexible learning paths are the key for modern education. Short learning opportunities that compliment the education or work experience can be of great benefit to the life long learner. Obtaining micro-credentials[4] to enhance the learning experiences converted to formal learning methods can diversify the students' portfolio and their overall knowledge. Still, they should not actually become an additional burden for students' access or their financial situation, they should be quality assured and should lead to clear comparable learning outcomes that are compatible and recognised within full time programmes.

Lifelong learning continues to be instrumental when analysing the functions of higher education. As every year the average age of a student in the higher education system increases and the profile of an average student diversifies, it is of importance to recognize it and acknowledge the role that HE plays in lifelong learning execution.

Research, Development and Innovation

- Research and development must remain instrumental when developing higher education learning and teaching.
- Students need to have equal opportunities and rights to those of other participants in higher education.
- Students and young researchers must have the same intellectual property and publishing rights as all other members of the academic community.
- Strategic plans and allocation of resources should be aimed to sustainably boost the Research, Development and Innovation (RDI),

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[4] ESU has adopted a statement on micro credentials at BM 80 (Spring 2021) where it is more elaborated on what opportunities can be seen for the learners in EHEA.

and through that raise the quality of European RDI globally and support the countries classified as emerging and moderate innovators according to the RIS-Regional Innovation Scoreboard[5]

Research, Development and Innovation

Third cycle qualifications, aside from the quality of the study programme, pay attention to the institutional or general research excellence as well. Ph.D. students need to have the right to participate in all the governing bodies of the research institutions they work and/or study at, and to contribute to the development of that institution as well. Those institutions that have collaboration agreements in place should nurture an open inter-institutional environment, in terms of data and knowledge sharing, mobility opportunities, automatic recognition, research excellence and Quality Assurance and enhancement.

The research mission of the European universities needs to nurture the complementarity of the quality of higher education and the quality of research, absent commodification, academic dishonesty and institutional competition (including rankings). However, it is important to stress that teaching and learning are the core of the universities' mission, therefore research done by HEIs should be used in enhancing the quality of teaching and learning. ESU supports the EU's Open Science policy[6], in terms of both available sources of information and accessibility to it, and believes that all academic research should be considered a public good. All research and academic institutions should align the Open Science policy with their public responsibility values.

Scientific research must in no way be limited by the economic, political or social pressure and interference, and its only purpose should be sharing of reproducible, reliable and truthful research. The role of students in research must in no way be used for personal, financial gain. Students need to have equal access and rights as other researchers. For example, significant steps should be made for students to have an increased accessibility to international scientific databases.

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[5]
https://ec.europa.eu/info/research-and-innovation/statistics/performance-indicators/regional-innovation-scoreboard_en

[6]
https://ec.europa.eu/info/research-and-innovation/strategy/strategy-2020-2024/our-digital-future/open-science_en

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Research should never be regarded as property. Ph.D. students employed at the institutions as the teaching staff, while studying to obtain a degree, must have the time and ability to work on their research within the set work-time, avoiding mental and physical strain, stress and negative impact on their work.

Innovation in higher education should be supported, not only through entrepreneurship programmes as Start-Ups, but through educational approach (protection of intellectual property, patenting products and services etc.) and financial support of the students.

Intellectual property

Every student needs to have a possibility to fully utilise their own intellectual potential, both inside and outside of the learning programmes, under the support of their Higher Education Institutions (HEIs) or other key stakeholders. Students' intellectual potential must not be limited by their HEI or the educational system they belong to, even in cases when the intellectual design does not correspond to their study field.

Students, during the course of their studies, should be able to learn about the guiding principles of academic integrity and about the normative framework governing academic production and protecting publishing rights.

Students` own intellectual property, understood as intangible and tangible, must never be claimed by the teaching staff or other HEI staff providing them with guidance and mentorship.

All students must have the same intellectual and publishing rights as all other members of the academic community on the national and international levels. They must never be forced or persuaded to give up their intellectual property rights (copyrights, theses, written work) to another party, regardless of the origin of the third party. Higher education should have systems in place to prevent such actions.

Proctoring software

When addressing the tools for assuring academic integrity in higher education, they should never limit students' rights or freedom. ESU is against the use of any proctoring software that endangers students' rights,

specifically data protection and students' privacy. Proctoring software may pose great risks in terms of student data protection and privacy, even though its use is fairly simple and widespread, especially after the onset of the COVID-19 pandemic.

ESU believes that higher education institutions should, under no circumstances, enforce proctoring software to assure that the students adhere to academic integrity regulations as this can hinder the integrity of the learning process and the institution itself, especially in cases where students cannot choose whether they wish to be subjected to those tools. No student should ever be forced to use any digital tool that will use, store or track their behavioural patterns against their will. The only proper way to assure academic integrity not only in grading, but all aspects of learning and teaching, is a positive promotion and instilling those values in students throughout their education. ESU believes that the use of proctoring services can contribute to the stress and anxiety levels in students, as there have been many documented cases of proctoring-based discrimination against student minority groups.[7] [8] [9]

With the background of manifold arguments against the use of this software, its use should not always be justified. ESU believes that:
1. The proctoring software can never be mainstreamed in higher education and should only be used in specific situations where the needs outweigh the sacrifices, and the students agree on the use of such software;
2. Ethical standards need to be developed for the use of proctoring software in higher education;
3. The development of proctoring software has to take into account both the ethical standards and the privacy protection rights and issues.

Bologna Tools

- ESU continues to advocate for wider and effective adoption of Bologna Tools;
- ESU sees the European Credit Transfer and Accumulation System (ECTS) as a universal currency for higher education studies;

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[7]https://hybridpedagogy.org/our-bodies-encoded-algorithmic-test-proctoring-in-higher-education/
[8]https://www.baden-wuerttemberg.datenschutz.de/rechte-der-studierenden-muessen-auch-bei-online- pruefungen-beachtet-werden/
[9]https://link.springer.com/article/10.1007/s10639-021-10458-7

- ESU continues to advocate for use of the ECTS as transparent system allowing learners to measure their workload and transfer and validate the learning outcomes, also in the scope of emerging developments in the area of short learning opportunities and micro-credentials

Qualifications Frameworks

The use of Qualifications Frameworks throughout Europe implies that the coherence is vital. National qualifications frameworks need to be in line with the EHEA Qualification framework (QF-EHEA) and the European Qualification Framework (EQF-LLL). This coherence must not reduce the diversity and pluralism of disciplines and delivery. Qualifications frameworks as such must not be static but rather continuously adjusted and improved.

European Credit Transfer and Accumulation System

ECTS is widely used across European countries, albeit not implemented properly everywhere[10]. However, ESU still continues to advocate for the adoption of the ECTS system in formal, non-formal and informal education provision. This is to say that not only can formal subjects be converted to ECTS points but also other study-related activities. ECTS for non-formal and informal education should always be based on learning outcomes.

Credit systems can be beneficial for achieving more transparency and compatibility between different educational structures. Taking the students' workload and learning outcomes as the basis of credit allocation is also essential for implementing the SCL approach. Currently, credit allocation is often based solely on teaching input or other components, while the actual workload necessary to successfully complete part of a study programme is often neglected.

Students' workload should be based on the investment of their time in the entire learning process, including non-contact hours. This means that all activities have to be taken into account; not only the time students spend in lectures or seminars, but also the time students need for individual learning and preparation for examination(s), and any other kind of activities which assist them in successfully achieving the intended learning outcomes.

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[10] https://www.esu-online.org/publications/bologna-student-eyes-2018-2/

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ESU sees ECTS as a universal currency for higher education studies that makes it easier to transfer studies in the international sphere and for employers to understand their qualifications based on learning outcomes. Higher Education systems and institutions should make continuous efforts to implement the ECTS system according to the ECTS users' guide for all study programmes and their integral parts, for example internships integrated in the study programmes. The update of the guide should be considered when the new learning opportunities, such as micro-credentials and shorter learning opportunities, will be implemented into the ECTS system.

Recognition, Diploma Supplement and Digital Credentials

The field of recognition we know today has grown substantially over the last years. According to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESGs[11]) point 1.4., fair recognition of prior learning, study periods and obtained qualifications is essential to assure the progress of students and young professionals. Learning and qualifications can be classified as formal, non-formal and informal, and all of them should hold a value within the academic community and students` personal study portfolios.

Fair recognition procedures should follow the principles of the Lisbon Recognition Convention[12], as should they rely on the European Qualifications Network, with whom the National Qualifications Networks need to align. All recognition procedures must be rid of the political influence and interinstitutional distrust and should be accessible to all students wishing to either continue their education in a certain country, or to enter the labour market with an obtained qualification from another country. Special attention should be paid to the accessibility of the recognition procedures to the disadvantaged groups, as well general accessibility and transparency of information provision. Recognition of prior learning is an important step towards eliminating obstacles forrefugees and asylum seekers to access formal education.

Automatic recognition is strongly encouraged in cases in which stakeholders have in place bilateral or multilateral agreements, and even more so between all stakeholders participating in the formation and implementation of study programs leading to joint degrees. Students should not suffer from the

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[11] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf
[12] https://rm.coe.int/168007f2c7

consequences of lengthy recognition procedures in any way that would cause harm toward the goal for which the recognition is requested. Achieving cross-border recognition is evermore important in the continuously increasingly internationalising world.

All students need to have the right to receive proper documentation on their qualifications and title obtained, together with the learning outcomes, content and the level of studies, as well as obtained competencies outside of their study programme.

Many different tools can be used to foster fair recognition. One such tool is the Diploma Supplement that needs to be available to all students free of charge and should be standardized at the institutional level. Diploma Supplements must be issued both in the study language of the curriculum and in a widely used European language. This certification should be mandatory and automatically issued upon graduation, always free of charge and following a standardised model. Education Institutions should have the obligation to outline relevant extracurricular activities in the diploma supplement, through transparent and coherent procedures. We support the efforts to digitalise the process of issuing diplomas and the DiplomaSupplements (e.g. promote the use of European Digital Credentials for Learning ;Europass database), which will enable data transfer that can be further used for recognition purposes.

The achieved learning outcomes must also be clearly stated in these documents. This also includes situations in which more credits and/or learning outcomes have been accumulated than the minimum requirement for obtaining a degree. Qualifications should be recognized through other forms of recognition too, such as digital certificates, badges, micro-credentials, recommendations, as well as be validated by the additional ECTS points.

DEQAR

DEQAR is the Database of External Quality Assurance Results on activities performed by EQAR-registered Quality Assurance agencies[13]. In recent years the database developed its scope significantly. ESU, being closely cooperating with EQAR supports and foresees the use of DEQAR through the interoperability with other relevant databases containing information on

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[13] https://www.eqar.eu/qa-results/search/by-institution/

accredited institutions and professions, as a link between the database and European Digital Credentials for Learning (Europass database), which will enable transfer of data, that can be further used for verification of those.

Moreover, we see the use of DEQAR as a tool to support ESU's student experts, and other student experts in Quality Assurance, through policy analysis, by broadening the knowledge of ESU's representatives in their work. Additionally, we support research and development of measures to foster student involvement based on the analysis of information available in DEQAR database. EQAR should continue to work together with ESU on promoting the database and its use within the European Higher Education Area (EHEA).

Quality Assurance and Tools for Achieving Quality

- The SCL standard is of the utmost importance, and countries across the EHEA should strive for full transformation of the national provisions to execute this standard in practice while carrying out the reviews with full and meaningful engagement of students.
- ESU stands for full implementation of ESGs 2015 and stresses the need for the revision of the existing ESGs and their update, as higher education develops into new directions

Quality Assurance

Quality Assurance systems and procedures should focus on how HEIs support and promote students' achievement of intended learning outcomes through teaching and learning and assessment methodologies, as well as the admission of students, progress and completion, ensuring their learning experience remains at the forefront of institutional missions.

Quality Assurance should have multiple purposes. Primarily among them is the enhancement of quality in the learning-process, including study programmes, learning opportunities and facilities available for students; creating and promoting a quality culture within HEIs; staff development;

increasing mutual trust between actors in higher education; enabling reciprocal recognition; empowering students' participation in the decision making process, facilitating comparability of qualifications and addressing the aspect of social dimension of higher education. Moreover, as a logical consequence of institutional autonomy and the notion of higher education as a public responsibility, Quality Assurance should also intend to hold HEIs accountable. At the same time it should provide relevant information about their activities and performance to students, external stakeholders and society at large.

Change-leading Quality Assurance should be implemented with a holistic approach for improving the quality of higher education according to the needs of the students. These processes should be fit for purpose, as little bureaucratic as possible and have concrete outcomes leading to real change and improvement.

It is key for ESU that HEIs and Quality Assurance agencies close the feedback cycle, providing public information about the main outcomes and actions taken as a consequence of the Quality Assurance activities. Quality Assurance reports should contain the most relevant information, especially for students, and they should be clear and accessible. Those reports should be accompanied by a clear and accessible summary that contains the most relevant information for students.

Students must be involved in all Quality Assurance processes, boards and committees, as one of the key stakeholders, to reflect on the matters of their interest toward quality enhancement. Students must be given an opportunity to provide an invaluable feedback on the learning process that serves as a basis for Quality Assurance, and should have the opportunity to raise their concerns and propose changes on the institutional and programme level.

Internal Quality Assurance

ESU believes that HEIs hold the primary responsibility for the quality of their education provision, for assuring the quality of their activities through sound internal Quality Assurance systems and to take opportunities for continuous improvement. Key activities of these systems should include monitoring and evaluating activities of all education delivery, including the study programmes and their design, student support services, and wellbeing. This

should lead to an action plan with clear aims in which implementation can be tracked. Students have to be in the centre of internal Quality Assurance, and their comfort and safe space should be assured, regardless of their background and status. The system has to perform permanently and its evaluation should be cyclical. The internal Quality Assurance has to aim toward building the quality culture and should result in constant improvement of learning and teaching at an institution.

As full members of the academic community and competent stakeholders, students should be fully involved in defining the Quality Assurance policy of the institutions and its internal system. Evaluation of teaching activities is an important part in the internal Quality Assurance evaluation system and provides a real opportunity for each student to evaluate their education, as well as affect the education for future students. HEIsshould create a feedback culture, and should openly and transparently deliver to students the results of their assessments, as well as the information on the improvements introduced based on the students' feedback. Equally as important as ensuring student involvement in the assessment bodies is ensuring good intelligence of the feedback tools by using a mix of several instruments, such as student questionnaires, focus groups, suggestions boxes, complaint procedures, etc.

Such activities support the development of a quality culture that is embraced by all, from students and academic staff to institutional leadership and management. Quality culture can be seen as the capacity of the internal stakeholders to develop Quality Assurance implicitly in the day-to-day work of the institution, ingraining Quality Assurance and enhancement.

Recent graduates, who already had the opportunity to use learning outcomes in real life, should play a consultative role in the process of constant improvement of curricula. Their opinions should be collected by institutions and used as a standard basic tool to make the programs adjusted to the real needs of continuation of education, participation in civic society or in the labour market. However, we must be vary of the differences between the graduates as participants in the labour market, and the role of higher education, which must never be commodified, yet updated and relevant.

Internal Quality Assurance systems should be aligned with HEIs' mission and strategic priorities and act as an integral part of the managerial structures of

HEIs. ESU also emphasises that while Quality Assurance bodies are a supportive structure within the HEIs, they can neither replace governance bodies and student participation within these bodies, nor undertake their responsibilities

External Quality Assurance

ESU believes that internal Quality Assurance systems should be supported and complemented by external Quality Assurance activities. Independent Quality Assurance bodies and agencies should carry these activities out through peer review evaluation, where students are also fully involved and have equal positions (in terms of decision making power, compensation and working conditions) in review panels as other members. HEIs should be willing to undertake external Quality Assurance activities to support and enhance their internal systems and their education provision.

The external Quality Assurance systems should focus on a combination of institutional evaluation and programme accreditation, where the latter might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal Quality Assurance.

External Quality Assurance should be provided by public institutions. It must be publicly funded and should not work in a profit-oriented manner and should not stand in competition to each other. External Quality Assurance bodies or agencies should have an autonomous responsibility for their operations, and the conclusions and recommendations made in their reports must not be influenced by third parties' political agendas.

ESU demands student representation in the relevant governing and decision-making bodies of the Quality Assurance agencies. National governments are also responsible in setting up the frameworks for Quality Assurance in cooperation with students and other relevant stakeholders. Student unions should also be enabled to take responsibility for recruitment, selection and training of the national students' QA experts in cooperation with the agency.

When considering Quality Assurance at an inter-institutional level, no standard Quality Assurance practice should be disregarded and following the

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set ESGs shall assure the needed agreed minimal standards the institutions must comply with to assure their quality.

Quality Assurance of Digital Learning

Quality should be a priority in the design, monitoring and evaluation of any digital learning activities. Quality Assurance procedures are in many cases not yet sufficiently adapted to digital learning provisions. For the different types of digital education, including blended, hybrid, and distance learning, as well as MOOCs and short online courses, either existing Quality Assurance procedures need to be adapted or new procedures have to be created. As a part of this, anyone who has a role in these procedures, such as panel members, has to be specifically trained to be able to assess digital components. Material offered partly or fully by private companies also needs to be subjected to those quality standards.

QA procedures for digital learning need to follow the same principles as existing Quality Assurance procedures. These include SCL, ongoing monitoring of Learning & Teaching processes, and closed feedback loops. Student participation in Quality Assurance procedures and in the development and quality enhancement of digital learning is also essential. This encompasses much more than students' assessments. Also, students with different profiles need to be heard, including those students participating partially or fully online.

An important aspect when evaluating digital learning is whether the digital infrastructure that supports the learning environment is of sufficient quality. It is also crucial that all of the digital learning environment is fully accessible for all students. Finally, special attention needs to be paid to assessment in digital learning and making sure that the methods used for assessment are appropriate for the intended learning outcomes, are accessible for all students, and follow ethical standards.

A common initiative should be developed within the EHEA for ensuring and enhancing the quality of this type of education provision, and the recognition of the achieved learning outcomes.

Quality Assurance of joint degrees

Students studying to obtain a joint degree need to be prioritized over the institutional benefits to provide such programmes. They should benefit from

the same facilities, services, rights and responsibilities at all institutions providing the joint degree, and must not differ in their advantages with the other students studying uninterrupted at the same institution involved in a joint-degree programme.

As mentioned in the outcomes of the EUniQ project[14], the purpose of joint degrees must be flexible joint provision, however it should be stressed that the physical provision should be valued highly above the virtual provision, and should account for the majority of the planned programme. Instead of the advocacy on the trust-based and enhancement-led approach, these should be the grounds for the establishment of joint degrees, leading to automatic recognition of the obtained degree. The lack of the harmonization of the approaches to joint degrees, from national laws and regulations to the accreditation systems must be mitigated to assure the complete functionality of the individual programmes.

Different economic, social and educational factors between countries/ cities in which the HEIs operate must be considered when offering joint degree programmes, and students should receive any support they might require to overcome these differences. Additionally, students working during studying at the joint-degree institutions could suffer economic consequences of their studies and should be supported in order to avoid/ overcome them.

When assessing the quality of joint degrees, the quality of the facilities, as well as access to information and services can be hard to determine. ESU believes that, in order to have fully functional joint-degree programmes, several factors must be accomplished:

- All ESGs must be satisfied by all individual joint-degree institutions;
- All institutions must provide students with full access to the libraries, study materials and other necessary resources;
- The success of the individual`s graduation must not be limited by any factors of the programme organization;
- All information on the joint-degree studies must be available to students at all joint-degree institutions;
- All joint-degree institutions must set in place automatic recognition procedures for their students or they should be the co-issuers of the

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[14]

http://www.ehea.info/Upload/TPG_C_QA_HR_UA_3_State_of_play_of_EUniQ_project.pdf

degree to assure equal opportunities for students of joint-degree programmes as those under the regular programmes benefit from.

European Standards & Guidelines

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESGs) should reflect all of the current stands. Internal Quality Assurance within HEIs, external Quality Assurance of higher education, Quality Assurance agencies and national Quality Assurance frameworks should comply with and work according to the ESGs.

However, even though ESGs present the minimal standards institutions and programmes must satisfy, we have to be aware of the ever changing learning environment and adapt ESGs to fit the needs and expectations of students, including covering all European programmes that fulfil those needs and expectations. This particularly concerns joint programmes, virtual learning etc.

It is the responsibility of the institutions and Quality Assurance agencies to ensure the implementation of the ESGs, and governments should create the framework to support the full implementation of the ESGs. Taking into account the latest revision of the ESGs in 2015, and being aware that we are going towards their new adaptation, it is of the utmost importance to support the stakeholder collaboration. The student-centred learning standard is of utmost importance, and countries across the EHEA should strive for full transformation of the national provisions to execute this standard in practice while carrying out the reviews with full and meaningful engagement of students.

In addition, ESGs should, in their new revision, raise the focus on the social dimension aspect of education, making sure that the conditions present so far in the ESGs are met, yet that they are readily accessible to participants (students, teaching staff…) from all backgrounds.

European Qualifications Assurance Register

The European Quality Assurance Register for Higher Education (EQAR)[15] should be keeping its role in the EHEA as a trust-building entity, which

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[15] https://www.eqar.eu/

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registers Quality Assurance agencies that work in compliance with the ESGs. As one of the founding members of EQAR, ESU would welcome the empowerment of EQAR, and thus invites Quality Assurance agencies to apply for their registration within it, as well as national governments to recognise through national legislation and uphold those registered Quality Assurance agencies and their decisions, while respecting the national Quality Assurance frameworks.

ESU would like EQAR to focus more directly on students and prospective students as one group of users, through providing an information tool offering support for study choice and promoting similar initiatives on the national level. EQAR should achieve this by attracting end-users directly to its resources or in cooperation with larger scale projects in which EQAR could play a key role in building trust through transparency.

Due to the rapid development of the sector of private education providers the upcoming years ESU foresees a strong need for establishing the system which will allow for a widely-trusted tool for verification of the education providers not only within the HE sector but beyond.

Students as stakeholders in quality education

According to the Bologna With Student Eyes 2020 Publication[16], it is clear that the students are predominantly involved both in internal and external QA processes, however their roles vary, as well as the importance of their engagement. ESU firmly believes that the QA processes must involve students as equal members of the panels, to assure the students` perspective on the institutional/ programme development and conditions, as they first-hand experience its impact. Additionally, students offer a unique perspective that cannot be replaced by other members of the panel.

Equally important is to validate the work and effort students are putting into learning about specific review processes, preparing for the panel and their participation, by assuring equal payment for them, as for the other panel members.

Constant investment into building and maintaining students' pools of experts needs to be provided, not only by the student organizations, but by the QA

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[16] https://www.esu-online.org/publications/bologna-student-eyes-2018-2/

bodies and institutions as well. Students' short stay at HEIs, considered in relation to other QA experts, should not be used as an excuse to not invest time and effort into forming them into QA experts. Their participation in student expert pools can play a crucial role in the preparation of independent student experts, promotion of peer-learning, cooperation and collaboration with other student experts and having a role in training new student experts. Only when QA systems function equally at all expert levels, can we claim that the QA system is itself quality assured.

Student expert pools offer an additional benefit for other stakeholders- one point of contact, ability to track and contribute to the development of students' engagement in QA, easy access to local and national experts. They can also serve to attract and recruit new students for the pool, as well as other stakeholders that wish to help train them.

Finally, students should be members of all Quality Assurance bodies, as well as involved in the process developing and defining the Quality Assurance system itself, and there should be a clear procedure in place for ensuring that their opinion is equally taken into account.

Quality Enhancement

- ESU believes that Quality Assurance is a potent transparency tool, and there should be more work done to transmit the information about Quality Assurance outcomes to the wider public and the students.
- ESU reaffirms its position that the institutional quality must develop beyond the standards set as the minimum requirements, and should constantly pursue further development of institutional and programme provision
- Quality of education must always be assessed with integrity and should not be used as a tool to pursue an increase in institutional reputation and prestige on the basis of rankings.

Stakeholder Collaboration

One of the key features of the European approach to Quality Assurance of higher education, and the key for its success, is close cooperation between stakeholders. This cooperation fosters communication across stakeholders' boundaries and a common understanding of Quality Assurance throughout the EHEA. Therefore ESU perceives E4 cooperation (EUA, ENQA, ESU and

EURASHE) as an enriching activity that takes Quality Assurance forward and leads as a good practice at European level. Achieving sound Quality Assurance systems requires taking advantage of and using the Bologna tools and recent European reforms like the learning outcomes concept, qualification frameworks, ECTS, the diploma supplement, micro-credentials, etc.

Transparency

Proper information provision about higher education systems and institutions is a prerequisite for students to make qualified choices about institutions based on their own preferences and needs. Students require relevant information for their study choices. They need access to qualitative information about HEIs, job opportunities and programmes provided in an independent and unbiased manner.

Quality Assurance is a process of building and maintaining trust. ESU believes that it serves as a potent transparency tool, and there should be more work done to transmit the information about Quality Assurance outcomes to the wider public and the students. This should be especially linked with information databases that provide descriptive information about higher education such as study programmes and courses. HEIs are free to build their own equally valued profiles and to be assessed against them. Quality Assurance pays attention to processes and provides a thorough, informed analysis.

Multidimensional and user-driven transparency tools

ESU reaffirms its position that classifications must not lead to league table positions and act as the basis for developing rankings. Rankings and classifications pressure higher education institutions to perform in a reputation race, chasing criteria instead of focusing on their broader mission, and thereby overlooking quality. We strive for horizontally diversified higher education systems and believe that putting HEIs in pre-defined profiles increases conformity rather than transparency and quality.

Under rankings and classifications, the rise and fall of the reputation of a HEI must never give room for adjustments in funding and tuition fees. Rankings must not be used as a tool for commodification of higher education. This agenda, in which students are seen as consumers or products instead of

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stakeholders, opposes European values. Students are an invaluable part of the academic community as well as society, and must be engaged in the education process. Furthermore, ESU is concerned at any attempt to measure educational quality or success in terms of employment or income statistics – while important; these do not provide an accurate reflection of quality in higher education.

While rankings reflect the growing international competition among the higher education institutions, they also push them into a reputation race where the higher education institutions are evaluated on the basis of a narrow, sometimes of little relevance to students and often no transparent set of indicators.

ESU stresses that higher education and research institutions have different profiles and missions, and any information tools developed should reflect these differences and incorporate a multidimensional approach when looking into institutions' performance.

ESU welcomes the development of user-driven information tools that reflect the individual needs of various users and student cohorts, as this would lead to the development of real transparency tools. ESU is strongly against using multidimensional transparency tools for creating another type of ranking.

ESU commits to pioneering the creation of student-driven transparency tools that will serve as an instrument for building trust and facilitating SCL. As a guiding principle, student-driven transparency tools must reflect the aspects of higher education that students' consider essential in choosing the place and subject of their studies.

Quality for the Future

- The key words for societal impact are accessibility, employability, transversal skills, entrepreneurship, and sustainability.
- Quality of the future should not use the standards to assure compliance, but should rather use the standards as minimum and check institutional progress on developing and implementing them.

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The quality of education should never be regarded in a context of Quality Assurance, rather as a value of higher education and work. Integrity of the quality process must be assured in a transparent way between all the stakeholders and criticism of the education process should be welcomed.

Quality of the future should support the lifelong learning process as the only way to assure true quality of learning, and interlinking it with other societal stakeholders, not just the labor market. Education should consider how it affects the quality of an individual's life and how well it prepares an individual to integrate obtained learning outcomes into the society. It should allow the growth and expansion of high quality knowledge-sharing, productivity, entrepreneurship and other initiatives. Education should also provide individuals with proper knowledge on academic values, academic freedom, academic and research integrity, and should allow all the participants to actively be involved in international cooperation.

Societal impact

The key words for societal impact are quality and the impact of education, employability, transversal skills, entrepreneurship, social inclusion and sustainability.

Societal impact that higher education has on the general public must be kept in mind when developing education systems. Employability, preparing students with the skills of the future with the emphasis on sustainability to the societal changes, are the key challenges that higher education nowadays has to face.

In the face of the COVID-19 pandemic, it became apparent how different societal stakeholders impact the public opinion generation, as well as impact the decision-making of the general public. It is apparent that higher education needs to invest their time toward knowledge-sharing, that is readily accessible, understandable and shareable to the community, in order to contribute to the uplifting in general public knowledge. Even though the role of HEIs is to provide higher education knowledge, that does not mean that the institutions do not have an obligation to share the research and the relevant information they have, in order to better the society. Additionally, HEIs need to promote the involvement of all stakeholders (teaching staff, students etc.) in democratic citizenship and should help in building the digital literacy of the society members.

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The Climate crisis is impacting us and the role of education should be to provide the students with the competencies to mitigate their environmental impact, not only in their everyday life, but in their work and studies too. Entrepreneurial activities in support of these measures should be particularly supported and valued.

Opportunities for All

ESU once more stresses the importance of all aspects underlined in the Students` Rights Charter, which advocates for all students to have the same opportunities, access to education and educational opportunities.

All education should be inclusive; however, some groups may need accommodations and more support to achieve their learning outcomes. These include students from minority groups, low socio-economic backgrounds, non- traditional students, student-parents, pregnant students, student carers, estranged students and students with disabilities. All students should have access to varied teaching and learning methods, this is especially important for students with disabilities. These students should have individual learning plans that give them more flexibility. They should have access to alternative assessment methods to accommodate for their individual needs. There is a value to education itself, such as an individual sense of achievement, however by completing higher education, these groups will have more opportunities for employment post-graduation. By ensuring these students are included, all students will have equal access to quality education.

ANNEX

ESU is not alone in advocating for the quality of higher education. ESU is supported by our member unions and partners in standing up for the quality of education. What follows in the Annex, are examples of policy papers that echo and enhance the view that ESU advocates for.

- **ESU Statement on Digitalisation** can be found on ESU web page via link here: https://www.esu-online.org/?policy=digitalisation-statement;

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- **LIS's Policy Paper on Quality** can be found here: https://studentar.is/s/Gastefna2019_enskaprent.pdf;
- **EÜL's Policy Paper on Higher Education** can be found on EÜL's webpage via the link provided below: https://eyl.ee/wp-content/uploads/2021/05/EUL_AP_seisukohad_14_05_21_seisuga.pdf;
- **Student Rights Charter**: https://www.esu-online.org/?policy=student-rights-charter;
- **ESQA guide for effective involvement in QA**: https://esqa.ro/wp-content/uploads/2020/07/Draft-ESQA-Guide-for-for-effective-stakeholders-involvement-in-QA_for-consultation.pdf.
- **Lifelong Learning, Massive Online Courses and Micro-Credentials Statement:** https://www.fzs.de/2021/09/22/statement-lebenslanges-lernen-massive-online-courses-und-micro-credentials/;
- **Digitalization at Universities – No Analog Universities in a Digital World Paper:** https://www.fzs.de/2021/09/16/digitalisierung-an-hochschulen-keine-analogen-hochschulen-in-einer-digitalen-welt-2/.