

27 March 2014

## **EUA response to the public consultation on a “European Area of Skills and Qualifications”**

*The European University Association (EUA) represents 34 national rectors’ conferences and close to 800 universities and other research-intensive higher education institutions from 47 European countries. EUA’s aim is to strengthen the convergence of European higher education and research, and enhance its global articulation and recognition. Since its conception, EUA has contributed actively to policy development, both as a member of the Bologna Process and in the discussion on the Lisbon Agenda and the European Research Area. Higher education reform, mobility, as well as partnership and cooperation within Europe and with other parts of the world are of crucial interest for EUA and its members.*

The consultation collects the views of stakeholders regarding the potential of European policies and projects to contribute to the development of a “European Area of Skills and Qualifications”, more specifically, whether existing and still to be developed European transparency tools could further support this process. In the background paper, it asks how to

- (1) place a stronger focus on and enhance the relevance of skills,
- (2) strengthen links between education/training, mobility and the labour market,
- (3) enhance internationalisation,
- (4) ensure overall coherence of policies and tools,
- (5) further implement learning outcomes, boost recognition of skills and qualifications,
- (6) increase the focus on quality assurance
- (7) and establish at EU level a one-stop access point to provide information and services supporting learners and workers in the European Area of Skills and Qualifications.

On behalf of its members EUA welcomes the consultation. It believes that it is important to regularly assess the policies, structures and instruments in higher education, and that consultation of stakeholders has to be given high priority in this matter. This is even more crucial in times of economic crisis and rapid changes in learning and teaching.

EUA has understood that the EC’s intention is to assess the impact of existing structures and instruments in order to enhance synergies and interaction between the different structures and tools. This is a very important issue, and requires a discussion regarding the criteria under which they would have to be assessed.

From EUA’s point of view, the tools should help universities to provide more and better learning opportunities to a growing number of students, with more diverse learning needs. They should also support the transition of individual graduates into careers, and further learning.

While EUA believes that it is important to enable the transition between the different education sectors, and observes the growing need of its members, e.g. to reach out to schools, and to collaborate closer with VET, it is sceptical of attempts to achieve this through new tools and instruments.

As the EC proposes a European Area of Skills and Qualifications, EUA would also like to highlight that for its university members and their constituency, the European Higher Education Area (EHEA) and its established instruments remain the main reference framework, as they have been developed in a long-standing policy process, involving universities and students as partners, and in full acknowledgement of university autonomy.

In this regard, EUA would like to point out that some of the instruments addressed in the consultation have been conceived very recently (e.g. ESCO), and will be literally unknown to most stakeholders. This is mentioned here because it points to a principal dilemma: there is a limit to the number of policies and tools that can be usefully launched and implemented in a given time, and there is a high risk of stakeholder fatigue and disinterest caused by the emergence of new, renamed or recomposed instruments.

In the following, EUA responds to all seven points of the consultation:

### **1. How to place a stronger focus on higher and more relevant skills**

EUA is of the opinion that these existing structures and instruments, such as learning outcomes, the three-cycle degree system, the European Standards and Guidelines for Quality Assurance in the EHEA (ESG), and the European Credit Transfer and Accumulation System (ECTS) have contributed to promoting and enhancing the skills approach in higher education.

These structures and tools also mark the shared understanding of the European higher education community and European governments. Furthermore, they are capable of taking new developments into consideration, as demonstrated in the current revisions of the ESG and the ECTS Users' Guide. The possible use of ECTS to express the duration of basic training in the regulated professions due to the recent revision of the Professional Qualifications Directive is an example of how instruments can be interrelated, and also for a consultation process that involves all relevant stakeholders and thus ensures ownership and broad consensus across disciplines and sectors.

Overall, the focus should not be on developing new instruments, but rather on streamlining, implementing and – where possible – interrelating existing ones in a changing context. This may also imply – where necessary and possible – adjusting and updating tools, and, in case they ultimately do not fulfil their purpose, discontinuing them.

For higher education, the EHEA remains the main reference framework in terms of European cooperation and transparency, recognised by all the national higher education systems. This would have to be carefully considered when developing additional tools.

There is also a question of purpose: in EUA's view, the most important goal is to support universities in providing learning opportunities to a growing number of high school graduates and to prepare them for the labour market and an international career, and at the same time take on board the needs of lifelong learners.

These are the most pertinent goals in order for any change or transformation of the European higher education sector to be implemented. EUA would like to emphasise this, as there is growing concern that modernisation could be led in the first instance by economic liberalisation, and could put public and not-for-profit higher education at risk. We follow with some concern the discussions regarding the Transatlantic Trade and Investment Partnership (TTIP), as well as the views of the EC regarding state aid in education.

## **2. Further strengthening links between education/training, mobility and the labour market**

Generally, university graduates enjoy much better employment prospects than graduates from other sectors. Presently, there is no indication that universities do not provide the professional skills required for the labour market. The often-heard statement that universities should deliver what the labour market requires clearly ignores the complexities of today's labour markets, and long-term career development. It is worth noting that higher education institutions occasionally report that their graduates face difficulties to get into employment as a result of curricula tailor-made to certain industries.

EUA would like to stress that academic study qualifies for a wide range of careers in a rapidly changing labour market. An excellent example are doctorate holders, who in their majority – after graduating from highly specialised disciplinary studies, including original research – take up key positions in the economy and society. However, statistical evidence could easily present these and other career paths as “skills mismatches”.

Beyond the results of the PIAAC, universities would need clearer information on the skills shortage of their graduates, and on the concrete implications that this has for their employability. Tracking of students and graduates should help to inform action at institutional and national level, e.g. with regard to early drop-out, retention problems in certain disciplines, lack of transversal skills and problems of labour market entry. Since the 2012 EUA report on tracking students and graduates,<sup>1</sup> presumably some progress has been made, but recent Eurydice studies show that, e.g. retention and drop-out are not assessed in some countries. Benchmarking between institutions and systems could provide input for a European-level debate on the issue, and further enforce national and institutional measures. This could also complement the European Skills Panorama.

The need to emphasise transversal skills has been recognised and taken up by higher education institutions, though there is certainly room for enhancement and sophistication, also regarding striking the balance of disciplinary knowledge and transversal skills in a degree programme. Competences in English and other foreign languages are of importance for a growing number of university graduates, and enhance their academic and professional mobility. Higher education is in the position to offer students a wider range of international languages, and hands-on opportunities for language practice, via courses taught in foreign languages, and mobility stays, which should help students to acquire the necessary intercultural skills, as well as self-certainty. However, this is, to a large extent, also conditional on language learning at primary and secondary school level, which, as the recent EU study demonstrates, has to be enhanced.

Universities are increasingly reaching out to secondary and in some cases even primary schools, in order to ensure smooth entry into higher education, better retention and overall, to improve social inclusiveness.

There are other examples that prove the ability of higher education to reach out to and collaborate with other education sectors, e.g. with vocational education, and generally, their engagement in lifelong learning.

EUA does not think that these relations could be enhanced via any tool, but that they depend in first instance on the institutional mission, and national policies and funding provision. Therefore, exchanges of experiences among institutions, for example, under EU funding programmes, are of importance, as they can also help to better understand the implications for higher education.

EUA would also welcome a broader discussion on the role and potential of higher education with regard to the results of PIAAC and Pisa at European level, considering also the resource implications. Our research suggests that in countries, where no national policies and funding for collaboration with

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<sup>1</sup> [www.eua.be/Libraries/Publications\\_homepage\\_list/EUA\\_Trackit\\_web.sflb.ashx](http://www.eua.be/Libraries/Publications_homepage_list/EUA_Trackit_web.sflb.ashx)

other education sectors are in place, it is usually facilitated via project funds, and has limited sustainability.

### **3. Adapting to internationalisation trends**

Temporary mobility and migration have the potential to enhance the careers of students, staff and graduates. They are also essential for the quality of learning and teaching, and for research, and underpin the European Higher Education Area and its international connectivity and recognition. In this regard, EUA believes that mobility and internationalisation of European higher education plays a major role from an academic and research perspective, but also with regard to European economic developments.

Europe, thanks to the European Union, and the achievements of the Bologna Process is more than the sum of its parts, and as the last decade has shown, this provides major opportunities for its international visibility and recognition. EUA has commented extensively on the European strategy for higher education internationalisation, and also on the development of Erasmus+, and will not repeat the arguments here.

Structures and tools of the European Higher Education Area have also been adapted in other parts of the world. EUA, in its work with partner organisations in different parts of the world, finds it important to raise awareness of the underlying principles, in order to enable different systems to communicate and exchange, e.g. in the case of Brazil-EU exchanges. There has to be sufficient flexibility to allow institutions to admit foreign students and graduates on the basis of their competences. This is, however, substantially different from the world-wide recognition of specific learning outcomes, proposed in the background paper of this consultation.

### **4. Ensuring overall coherence of tools and policies and further implementing the learning-outcomes approach**

The introduction of learning outcomes has been a paradigm change in higher education, resulting in a stronger emphasis on learning, learning processes and learning results, enhancement of curricula and learning materials. The ECTS has been a useful support for this process, as it emphasises, e.g. learning outside the lecture hall. Recently, in several higher education systems, curricula have been revised and learning outcomes newly written, which indicates that the process is not yet accomplished, and probably has to be perceived as an ongoing one.

While their reference in European and national-level policies and instruments is crucial for the institutional take-up, the main function of learning outcomes is to enable a shared understanding of learners and teachers on the learning process. As study programmes differ between institutions, so do learning outcomes. Level, sector and disciplinary descriptors should enable this process and make it more transparent, and help to enable better recognition.

EUA also welcomes the revised Directive's introduction of Common Training Frameworks for the regulated professions. It also looks forward to a better linking of ECTS and ECVET, and has committed to various initiatives to bring this process forward.

Principally, there should be no major problem in the recognition of online learning, which is already provided and awarded by many of EUA's members. MOOCs are a new case, but not substantially different, as either the course-providing institution can provide the credit, or another institution could recognise the course as prior learning. Forthcoming research undertaken by EUA confirms that

this is already common practice at some universities, and under consideration at others.<sup>2</sup> This confirms the perception that the existing tools are sufficiently adaptable to respond to learning innovation.

## **5. Ensuring clarity of rules and procedures for the recognition of skills and qualifications for further learning**

Recognition and related processes have to be further improved. However, EUA would like to emphasise that the responsibility of an institution is not only to assess the level of the degree, but also to ensure that applicants have the knowledge and skills required for the specific study programme they want to take up. The revised ESG are likely to include a reference to recognition, and this should help to enhance systematic approaches at institutional level to enable fair recognition.

## **6. Increasing the focus on quality assurance**

EUA has serious concerns that quality assurance (QA) is getting overloaded with a broader range of quite specific purposes. In our view, however, the ultimate goal of all quality assurance – both internal and external – is to enhance quality, thus promoting trust among stakeholders, and any further development of quality assurance needs to reflect this focus that is reiterated in the ESG.

Given the diversity of higher education systems and institutions all over Europe, the implementation of the ESG will inevitably vary to a certain extent. The experience shows that the most effective quality assurance is developed to reflect national requirements, but also the institution's own strategic mission and goals, and is adapted to its institutional realities. EUA has therefore advocated for many years for the concept of quality culture, which provides sufficient flexibility to develop QA, but also emphasises the responsibility of the institution. This emphasis on quality culture and institutional responsibility for quality, in line with institutional autonomy, with quality assurance agencies' role considered to be there to support institutions in this task and verifying that the task is performed properly, has been taken on board by the ESG (both in the current version and even more clearly in the new ESG that was proposed by the stakeholder organisations and is currently being discussed by the Bologna Follow-Up Group).

EUA is not in the position to advise on how QA in other education sectors should be developed, but remains sceptical towards any attempt of further streamlining EQF, ESG and EQAVET.

## **7. Providing learners and workers with a single access point to obtain information and services supporting a European Area of Skills and Qualifications.**

EUA welcomes the idea, but would like to raise the question whether and to what extent such a single access point is feasible and sustainable, and whether the expected impact would justify the certainly considerable costs to keep it up-to-date.

The impression is that the ESCO portal could become useful as a reference grid rather than a panacea for recognition and qualification problems. A question is whether the ESCO would effectively improve the situation of university graduates, in particular those from non-professional disciplines, as there is a risk that it would tie HEIs to labour market needs that are much too tightly defined. This could be used, for example, to threaten the viability of humanities programmes, which many

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<sup>2</sup> E-learning at European universities – May 2014.

employers find in fact very relevant. Similarly, it suggests that HEIs should prioritise the elimination of all vertical and horizontal skills mismatches when in fact it is these that have motivated some of the most successful careers. Finally, it fails to recognise the extent to which the creative industries depend on “patchwork CVs” and on roaming across professional and disciplinary boundaries.

Under all these considerations, a more feasible strategy to improve the situation would be to strengthen the role and remit of ENIC-NARICs, and the EUROPASS centres which are already funded under Decision 2241/2004/EC

Overall, expectations of tools and mechanisms have to be realistic. Qualification frameworks have been welcomed in some quarters as the ultimate solution to recognition and lifelong learning obstacles. While it is too early to provide a final assessment, their added value seems to be at a meta-level – as they are important for the work of ministries, higher education organisations etc. – but not for students and university teachers.

Our impression is also that the European Union is launching too many agendas and tools in a relatively short period of time, which makes it difficult – at least for universities and their constituencies – to follow up on, and presents the risk of diluting the impact of EU policies. Our impression, resulting from policy and practice work is that they do not reach other important stakeholder groups, for example, employers.

To provide an example: the 2009 Education and Training 2020 agenda was taken up in EU 2020 of the following year. The 2<sup>nd</sup> Modernisation Agenda in 2011 was discussed among institutions and their leadership, but the fact that it has been followed by the “Rethinking education” – without adding substantially to the higher education part – caused more confusion rather than stimulating interest and engagement.

If new instruments and tools are continuously launched and discontinued or revised and renamed year after year, this is likely to result in stakeholder fatigue and disengagement with the European higher education policy processes.

EUA would like to point out that the European Higher Education Area has been the framework for both converged structural reforms and intra-European exchange and collaboration for more than a decade. The consultation and the background paper seem to acknowledge the instruments, but remain slightly vague about the process itself.

The structures and instruments of the European Higher Education Area are the outcome of a longstanding European policy process. They cannot be deliberately redesigned, or replaced by other instruments. While they enable agreement on principals and structures among the higher education systems of 47 countries, they provide only a reference framework, with no means for legal enforcement. There are also examples of how these instruments, applied too rigorously, become an obstacle to international exchange.

While the necessity for exchange and collaboration between different education sectors and types of education institutions is acknowledged, it is also felt that the achievements that are part of the EHEA cannot be not be compromised or alternated or simply transferred in order to achieve better synergies.