

ENQA briefing note on the European Commission higher education package

March 2024

Overview

This briefing note is published by ENQA¹ in response to the higher education package presented by the European Commission on 27 March 2024. It outlines the key elements of the package with relevance for quality assurance agencies, and some initial reflections from ENQA in response to these.

ENQA welcomes the initiatives from the European Commission to facilitate international cooperation in higher education and quality assurance, in particular the elements related to enhancement-led quality assurance and removing bureaucracy and legislative barriers. ENQA also fully endorses steps to make automatic recognition of qualifications a reality, and believes this should be addressed as a priority.

ENQA appreciates that the proposals make use of existing tools in the EHEA (European Higher Education Area) and supports their full implementation, as synergies between the EHEA and the EEA (European Education Area) are vital for successful international cooperation.

It is hoped that the ambition shown in the proposals is matched by a willingness from national authorities to fulfil new and existing commitments. National legislation is frequently cited as being the primary barrier to cross-border cooperation in quality assurance, and ENQA underlines that the addition of new tools and approaches will not be possible unless this fundamental underlying challenge is addressed, not just in the EU (European Union), but across the whole EHEA.

Furthermore, ENQA voices caution regarding the additional expectations towards quality assurance agencies, particularly those that go beyond the standards and tools agreed within the Bologna Process. The prospect of new elements of external quality assurance in the EU, covering the criteria for the European degree and joint education provision of alliances of higher education institutions, could create significant additional complexity and the implications of this need to be properly thought through in terms of practical implementation as well as sustainable resourcing.

ENQA is pleased to see recognition of its role as a key partner in European higher education and looks forward to continued engagement with the European Commission to discuss the practical implications of the proposals.

ENQA strongly encourages member agencies in EU countries to engage with their relevant ministries in order to relay the key messages that should be taken up in the further negotiations on the proposals in the Council of the European Union.

Key elements of the higher education package

The package² is part of the development of the EEA, and consists of the following three initiatives:

- A proposal for a Council Recommendation on improved quality assurance processes and automatic recognition of qualifications in higher education

¹ ENQA (the European Association for Quality Assurance in Higher Education) is the representative body of quality assurance agencies in the EHEA.

² See [here](#) for the relevant documents published by the European Commission.

- A Commission Communication on a blueprint for a European degree
- A proposal for a Council recommendation to make academic careers more attractive and sustainable.

This briefing note focuses on the first two initiatives, as these have the most direct relevance for quality assurance agencies. While the proposals directly relate to EU member states, a spill-over effect is to be expected into the wider EHEA, particularly as some aspects, as well as linked funding instruments, may also be available also to non-EU countries.

European quality assurance and recognition system

Summary of the proposal

This is a proposal for a Council Recommendation, which is a non-binding act of the EU that nonetheless carries significant political weight to oblige implementation. The proposed Recommendation is built on five overarching topics:

- Improving all quality assurance systems, including by strengthening the enhancement dimension and ensuring responsiveness to societal and economic developments.
- Developing a cross-institutional quality assurance approach for sustainable alliances of higher education institutions.
- Making programme or combined approaches to external quality assurance more agile, including encouraging a shift to institutional-level external quality assurance, and allowing the use of the European Approach to the Quality Assurance of Joint Programmes where programme accreditation is still needed.
- Building the foundations towards a European degree.
- Implementing automatic recognition of qualifications.

The Recommendation includes two annexes: one on a cross-institutional quality assurance framework of alliances of higher education institutions, and one on the criteria for a European degree label.

Relevance for quality assurance agencies

The entire proposal is relevant for quality assurance agencies. The most prominent initiative is the development of a new external quality assurance process that evaluates the joint internal quality assurance arrangements of alliances of higher education institutions. This would cover at least the joint educational provision and include the criteria for awarding the European degree (label), allowing institutions to award this degree or label. It is envisaged that this process could be conducted by one EQAR-registered agency and the outcomes recognised by all relevant national authorities. The recommendation calls on member states to work together with quality assurance stakeholders to develop and test such a framework.

Reflections from ENQA

The proposal for a framework for the external quality assurance of joint education provision by alliances of higher education institutions is ambitious. It builds on the outcomes of recent Erasmus+ funded projects that have explored the external quality assurance of European Universities alliances. Institutional cooperation models are very diverse, meaning that the 'object' of the external quality assurance approach would vary considerably, depending on the depth and breadth of the cooperation. Furthermore, it could be very difficult to separate the 'joint' aspects of internal quality assurance systems from those addressing aspects specific to the individual institutions. This may make it difficult to discern which aspects would be exempt from national procedures following external quality assurance of the joint provision.

With such an ambitious programme there is a risk to practical implementation of the proposals, due to complexity, the pace of implementation for quality assurance agencies, and the sustainable resourcing of the activities. The complexity is further heightened when considering the external review of quality assurance agencies, which is a vital tool underpinning the legitimacy of agencies, institutions and qualifications. The proposal suggests that the scope of external reviews of quality assurance agencies would, where relevant, be extended to cover the European degree criteria and that EQAR (European Quality Assurance Register for Higher Education) should verify how agencies have performed this task. This is a need for further dialogue to reflect on the practical implications of this for the external reviews of agencies, which are primarily conducted by ENQA, and are currently done solely on the basis of the Standards and Guidelines for Quality Assurance in the EHEA (ESG). ENQA particularly underlines that some of the criteria for the European degree are out of scope of quality assurance (e.g. graduate tracking, multilingualism, and policies for green and digital transition).

The success of the main elements of the Recommendation requires national authorities to change their national legislation. However, this has already proven to be a significant barrier to the implementation of existing commitments under the Bologna Process, including the use of the European Approach to the Quality Assurance of Joint Programmes, and the recognition of quality assurance outcomes from all EQAR-registered agencies. Significant benefits and incentives will need to be formulated in order to prompt concrete changes at national level.

On the other elements of the Recommendation, ENQA fully endorses steps to make automatic recognition in the EU a reality, in the hope that this will also lead the way to full implementation across the EHEA. From ENQA's perspective this is a significant issue, affecting the vast majority of European students, not just those with joint degrees.

ENQA also notes the push towards institutional-level external quality assurance on the basis of robust internal quality assurance, and recognises that this makes many aspects of international cooperation easier. However, there remains a need to respect the diversity and autonomy of national systems to decide on the right approach in their operating context, as well as recognising the well-established place of programme-level approaches for some regulated professions, and as a voluntary choice for institutions for enhancement and reputation.

ENQA welcomes that all aspects of the proposal are based on quality assurance in line with the ESG and notes that several of the broader issues mentioned, including fundamental values, the social dimension, and links between the different missions of higher education institutions, are expected to be further discussed in the forthcoming revision of the ESG in 2024-2026.

European degree

Summary of the proposal

The European Commission's vision for a European degree is to establish a new type of degree awarded after transnational programmes delivered by a group of higher education institutions in the EHEA, which is based on a common set of criteria agreed at European level and which would be automatically recognised across the EU. The aim is to foster mobility, facilitate transnational collaboration in education delivery, and ensure that students acquire labour-market relevant skills and competences together with a strong sense of European identity. Criteria for the European degree have been drafted and tested through several recent pilot projects.

The Commission envisages two pathways to the European degree:

- A preparatory European label given to joint degree programmes meeting the criteria. The label certificate would be issued together with the degree.
- A European degree as a new type of qualification awarded jointly by higher education institutions on a voluntary basis or possibly by a European legal entity established by such institutions. It would be delivered as a joint degree and integrated into the relevant national legislation to exist alongside other national degrees.

Relevance for quality assurance agencies

Quality assurance agencies would be expected to either (at programme level) ensure that joint programmes that wish to award the label or degree meet the criteria; or (at institutional/multi-institutional level) ensure that the institution or alliance is competent to award the label or degree to relevant programmes based on its internal quality assurance.

Reflections from ENQA

To realise the vision of the European degree, one of the primary conditions is the requirement for national authorities to amend their legislation to include such a degree and to recognise the quality assurance outcomes from any EQAR-registered agency. The latter has been a Bologna Process commitment since 2012 (Bucharest Communiqué), but national legislation is cited as the primary barrier to this and other forms of cross-border cooperation, including the use of the European Approach to the Quality Assurance of Joint Programmes. ENQA welcomes measures from the EU that would prompt action in this regard, and in parallel strongly supports the need to make automatic recognition of qualifications a reality. ENQA also calls on the European Commission to press member states to remove the barriers that inhibit agencies' compliance with the ESG.

With regards to the role of quality assurance agencies in implementing the European degree, it should be noted that some aspects of the criteria are not explicitly linked to quality assurance and might therefore not be in the remit of quality assurance agencies to address through external review processes, at programme or institutional level. Furthermore, the distinction between barriers caused by quality assurance agencies themselves and those caused by national legislation should be well noted.

It is also vital that these proposals are backed by sustainable resources, which look beyond project funding. The additional workload for agencies is a significant concern at a time when human and financial resources are a key challenge for their work.

ENQA appreciates the invitation to participate in stakeholder dialogue, peer learning and solution finding, through initiatives such as the European Degree Forum and the European Degree Policy Lab. Cross-stakeholder cooperation and ownership will be vital to this initiative, as well as the linked proposal for a European framework for multi-institutional approach to external quality assurance.

Next steps

Before being adopted by the Council of the European Union, the two Recommendation proposals will be discussed with the Council and key stakeholders in higher education in the coming months. It is possible that amendments will be made at this stage, based on input from member states.

Quality assurance agencies that are based within national systems of the EU are encouraged to have dialogue with the appropriate ministries to ensure that their input is included in the preparation of national positions on the proposed Recommendations.