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

The European University Association (EUA) represents 34 national rector’s conferences and more than 850 universities and other research-intensive higher education institutions from 48 European countries. EUA’s aim is to strengthen the convergence of European higher education and research, and enhance its global articulation and recognition. On behalf of its members EUA contributes actively to European policy development, through the Bologna Process and (the European Higher Education Area) and as a stakeholder in the European Research Area.

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.

On behalf of its members EUA welcomes the consultation. EUA supports the EC’s intention to assess the impact of existing structures and tools in order to enhance synergies and interaction between them. It believes that it is important to regularly assess policies and tools developed and that consultation of stakeholders is crucial especially in times of economic crisis and rapid changes in learning and teaching.

From the point of universities, European policies and tools should fulfill the following key purposes:

- help universities to provide more and better learning opportunities to a growing number of students, secondary school graduates, lifelong learners and international students, with more diverse learning needs, and to prepare them for a broad range of career paths, in and outside higher education and research
- support universities to fulfil their triple mission of research, teaching and service to society, in collaboration with a wide range of university and non-university partners, including other education sectors and industries, in Europe and globally.
- strengthen the European Higher Education Area, and enhance its international visibility and recognition.
- should respect institutional autonomy.

This requires of governments across Europe continued commitment to the principle of public responsibility for higher education through their funding of higher education.

Response to the consultation: Four key issues for EUA:

- At the current stage, for the university sector, the issue is not so much the development of new structures and tools, but a better and more consequent implementation of the existing ones. Institutional tracking is, for example, one of the instruments that help universities to better assess the implementation and the impact of tools, also with regard to student skills and entry into the labour market.
- It is important that structures and tools are developed in shared ownership with the higher education community responsible for their implementation.
• Structures and tools are to a large extent sector and often even disciplinary specific. The consultation refers explicitly to these differences, and the different stages of development. Therefore universities would welcome EU initiatives that contribute to enhancing the interface between institutions from different education sectors in a national and European context, but does not see that this can be achieved through new tools. Hence EUA advocates for serious engagement with the issues of transition between sectors starting with the a major effort to collect evidence on current practices, possibilities and obstacles.

• At European level, progress could also be achieved by improving the presentation and coordination of initiatives that promote the sharing of European tools with global partners.

Specific responses to the seven points as addressed in the background paper and the online questionnaire related to the consultation:

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

EUA is convinced that – at least for the university sector - the existing structures and tools are fully sufficient for addressing the skills’ related issues to which the consultation refers, provided that they are properly implemented at national and institutional level.

EUA is of the opinion that the existence of overarching European structures, in particular the three cycle degree system, the European Standards and Guidelines for Quality Assurance in the EHEA (ESG), and the EQF and QF-EHEA and related tools, such as learning outcomes, and the European Credit Transfer and Accumulation System (ECTS), have contributed significantly to promoting and enhancing the ‘skills approach’ in higher education.

Furthermore, both structures and tools are capable of evolving over time, as demonstrated by 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, made possible through the recent revision of the Professional Qualifications Directive1, is an example of how tools can be interrelated.

These structures and tools have been endorsed by governments and stakeholders through the various Bologna Communiqués, and mark the consensus of the European governments and the higher education community.

EUA considers it important to maintain, implement and – where necessary - further develop these structures. Regarding the tools, the focus should not be on developing new ones, but rather on implementing the existing ones, to ensure that they effectively support the learning and teaching mission of institutions. This may also imply – where necessary and possible – adjusting and updating or even discontinuing tools, if they ultimately do not fulfil their purpose.

To provide a concrete example: The Diploma Supplement is in principal a useful tool. However, at present, there is little convincing evidence of its usefulness, and subsequently no indication of whether and how to enhance it, either by improving the format, or through better implementation and promotion, or through a complete redesign.

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

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Generally, tertiary level graduates enjoy much better employment prospects than others. The professional skills that universities provide are highly relevant for the labour market, and graduates with additional academic qualifications are highly sought after for a wide range of careers in a rapidly changing labour market. This also applies at doctoral level where increasing numbers of doctorate holders are taking up careers outside of universities and other research organisations.

Universities continue to respond to the complexities of today’s labour markets, and the fact that to-day’s graduates need to be trained for the multiple careers that they will have during their working lives. For this reason skills’ provision in universities differs qualitatively from that of vocational training with its more specific professional profiles. In addition, in some cases, graduate unemployment may occur as curricula have been tailor-made to the needs of certain industries that have in the meantime changed.

The need to emphasise transversal skills has been recognised and taken up by higher education institutions, though there is certainly room for further improvement. Language skills are also of importance for a growing number of university graduates, and enhance their academic and professional mobility. We also see benefit from a more systematic policy and funding support for the development of student services and career guidance.

In order to further enhance the role of higher education, **EUA believes that it is important to facilitate transition between the different education sectors.** Universities are increasingly aware of the growing need to reach out to schools, and to collaborate more closely with VET. This serves to ensure smooth entry into higher education, improve retention and access to lifelong learning. It also improves employability as well as social inclusiveness more generally. While this is already being explored by some universities serious engagement with the issues of transition between different sectors would require gathering more evidence on current practices, possibilities and obstacles than is currently available. **EUA believes that such an exercise would be of great potential value to policy makers and practitioners alike, and would be ready to contribute to such an endeavour.**

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. Since the 2012 EUA report on tracking students and graduates, presumably some progress has been made, but recent Eurydice studies show that, e.g. retention and drop-out are not assessed in some countries. Tracking of students and graduates should help to inform action at institutional and national level, e.g. with regards to early drop-out, retention problems in certain disciplines, lack of transversal skills and problems of labour market entry.

**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. Again, EUA would be ready to contribute to the development of an approach that would promote tracking at institutional level more broadly, and offer opportunities for data collection and benchmarking at national and European levels.**

### 3. Adapting to internationalisation trends

Short term mobility and longer term migration have the potential to enhance the careers of students, staff and graduates. Mobility is also important for the quality of learning and teaching, and for research. It is also a principle underpinning the European Higher Education Area, and its international connectivity and recognition.

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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 that 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.

The structures and tools developed in the context of the European Higher Education Area have also been adapted and used in other parts of the world. EUA, based on its experience of collaboration with partner organisations in different parts of the world, considers it important to raise awareness of the underlying principles enabling communication and exchange between different systems, 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.

EUA and its members have been involved in numerous initiatives promoting European structures and tools in other parts of the world, and supporting similar developments elsewhere, many of them supported by EC policy and funding mechanisms. So far, there has been no systematic stocktaking and no central platform for promoting these initiatives, and for enabling exchange of experience and synergies. With Erasmus+, the EC could have a more prominent coordinating role in facilitating exchanges and enabling coordination and collaboration between initiatives, thus ensuring better use of resources, and contributing to enhancing their visibility. This in turn would improve international recognition, ease mobility and enhance the visibility of Europe in a global setting.

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

The background paper gives the impression that structures and tools have been emerging almost at random, and driven by small interest groups. As explained above (see point 1), in higher education, learning outcomes have been embedded into the emerging framework of the European Higher Education Area, with the support of governments and the higher education community. They have been related to both structures (e.g. 3 cycle degree structure, the QF-EHEA) and tools (e.g. ECTS). As mentioned above, the main challenge for the higher education sector lies in the implementation at institutional level.

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. ECTS has been a useful support for this process, as it encompasses e.g. learning that takes place outside the classroom. It is important to note that in several higher education systems’ curricula have recently been revised and learning outcomes newly written, which indicates that the process is not yet accomplished, and thus this should be seen as an ongoing learning process.

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

EUA also welcomes the inclusion of Common Training Frameworks for the regulated professions in the revised Professional Qualifications Directive\(^3\). It also supports the initiatives that will advance a better link between ECTS and ECVET.

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 the 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 wish to follow. The revised European Standards and Guidelines for Quality Assurance in the EHEA (ESG) are likely to include a reference to recognition, and this should help to ensure the development of institutional level policies enabling fair recognition.

Principally, there should be no major problem in the recognition of online learning, which is already good practice in many EUA member institutions. While MOOCs are a new development, the situation does not differ substantially, as either the institution offering the course can provide the credit, or another institution could recognise the course as prior learning. Research presently being undertaken by EUA confirms that this is already in practice in some, and under consideration in other universities.\(^4\) This confirms the hypothesis that the existing tools are sufficiently adaptable to respond to learning innovation.

6. Increasing the focus on quality assurance

EUA has serious concerns that expectations concerning the purposes of quality assurance (QA) and what QA can achieve are becoming exaggerated through attempts to add broader range of quite specific purposes than those agreed hitherto by both stakeholders and governments. In our view the ultimate goal of all quality assurance — both internal and external — is to enhance quality, thus promoting trust among stakeholders, and thus any further development of quality assurance needs to reflect this focus, clearly explained in the ESG.

While open for exchanges with other education sectors, EUA is not convinced of the benefits to be derived from any attempts to further align 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 of a single access point, but questions 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 the information and services provided up-to-date.

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\(^4\) E-learning at European universities – May 2014.
From a university perspective 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 much less so for students and university teachers.

Some of the tools addressed in the consultation are very recent (e.g. ESCO), and will be unknown to most stakeholders. This is mentioned here because it addresses an important dilemma: If too many agendas and tools are launched or continuously modified and renamed, there is a high risk of stakeholder fatigue and disinterest.

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