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# Social Dimension Policy Paper 2019

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# INTRODUCTION

The Social Dimension of Higher Education has been defined most prominently in the Bergen, London and Yerevan Communiqué. The London Communiqué defined the social dimension as the societal aspiration that the student body entering, participating in and completing higher education at all levels should reflect the diversity of our populations<sup>1</sup>. This, however, remains an aspiration that is still very far from being achieved. This definition clearly outlines the link between the student population and society, which is an inseparable one, as the two coexist together within the larger community.

While countries have been dealing with this question over the years, results in many national and international studies show that inequity based on socio-economic status, parental education, gender, country-of-origin, rural background and other factors remains stubbornly persistent in our Higher Education systems. While improvement has been shown, analysis of this improvement over the last 40 years shows that that it could take over 100 years for disadvantaged groups to catch up with their more advantaged peers, should the current rate of improvement be maintained<sup>2</sup>.

From ESU's perspective, there are some fundamental aspects that cannot be overlooked when discussing what falls within the remit of the Social Dimension of Higher Education. Accessibility, transition and conditions which allow for completion of higher education by all individuals, regardless of their status or background remains at the core of this topic, and guides the different facets that are referenced in this policy paper. The reflection of society within Higher Education entails more than widening accessibility clauses, and in fact more emphasis needs to be put on following up on good practices of how to foster a diverse student population and to continue with the different needs of separate individual, and to steer away from the one size fits all approach. Governments and Institutions have a shared role in ensuring that proper policies are in place to secure the availability of accurate, reliable and effective information, counselling and guidance about prospects in HE

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<sup>1</sup> London Communiqué,  
[http://ehea.info/Upload/document/ministerial\\_declarations/2007\\_London\\_Communique\\_English\\_588697.pdf](http://ehea.info/Upload/document/ministerial_declarations/2007_London_Communique_English_588697.pdf)

<sup>2</sup>Tupan-Wenno, M., Camilleri, A.F., Fröhlich M., King, S. (2016) *Effective Approaches to Enhancing the Social Dimension of Higher Education*. Knowledge Innovation Centre.

for potential and enrolled students in order to increase their access, participation in and completion of HE studies.<sup>3</sup>

The value of non-discrimination is part and parcel of this process, and is a cornerstone towards achieving comprehensive diversity within the system. Whilst progress has been made in this regard, there still remains a lot of room for improvement as the situation in practice is still very different to that written into policy, where the latter is in place. Controversially, there are also countries where widening access to higher education doesn't feature in national policy or practice. Non-discrimination is not the end-goal, however, as mere tolerance should be superseded by a climate of inclusion, mutual care, safety, and diversity, with an intersectional and conscious approach taken with all issues.

To be able to meet the dimensions laid out in this paper, countries need to have a very clear understanding of what constitutes the underrepresented, disadvantaged and minority groups or individuals within their respective societies. At the same time, it needs to be understood that the so-called majority or minority groups are not necessarily actual groups (i.e. fixed entities with identifiable members). The term 'groups' simply signifies dominant categories that are in play in society and that describes ideas allotted to individual people who are believed to fit such labels.<sup>4</sup>

It is therefore imperative to walk the fine line between falsely believing that individuals defined into a group all have the same needs and interests, or similarly falsely believing that since individual differences always exist and matter, including voices of people from marginalized groups is futile, unnecessary or impractical. Walking this line, we can move towards creating spaces and institutions which allow all individuals to flourish, and to realize their potential to the fullest.

## THE HOLISTIC ROLE OF HIGHER EDUCATION

Higher Education is a firmly established fundamental institution and part of our society, as well as one of the most important mechanisms to steer our way through social, cultural, and economic changes in our societies. It is key to ensuring a prosperous, stable and inclusive society. However, this crucial role is put into

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<sup>3</sup> BFUG Advisory Group 1 Social Dimension (2018-2020)- Draft Version of the Principles and Guidelines of the Social Dimension,

[http://www.ehea.info/Upload/BFUG\\_FI\\_TK\\_67\\_5\\_5b\\_AG1\\_Principles\\_and\\_Guidelines.pdf](http://www.ehea.info/Upload/BFUG_FI_TK_67_5_5b_AG1_Principles_and_Guidelines.pdf)

<sup>4</sup> Tupan-Wenno, M., Camilleri, A.F., Fröhlich M., King, S. (2016) *Effective Approaches to Enhancing the Social Dimension of Higher Education*. Knowledge Innovation Centre.

jeopardy when higher education is not equally accessible or reflective of the diversity of the society, thus remaining a privilege of those with advantaged backgrounds.

Therefore, it is essential that the student body entering higher education should represent and serve as a proof of the diversity, inclusion and participation in the general society. Aside from this, it is important to also secure diversity within the academic and administrative staff employed in Higher Education Institutions. They should also mirror the diversity in society. This is not only important for enhancing the quality of education and legitimacy of higher education as an institution, but also to ensure a welcoming, comfortable and inclusive environment for diverse groups of students entering higher education.

ESU strongly believes that access to higher education is not only a human right but is also fundamental to the functioning of a society. For ESU, access means much more than a simple lack of legal restrictions to education (even though these should similarly be abolished). As outlined in this paper, ensuring access requires proactive measures by states, considerations of policy areas not commonly thought of as related to Higher Education, cultural shifts and shifts in understanding in many fields, and a true commitment by all stakeholders to focus on the Social Dimension as a key priority in the field of Higher Education.

## **RESEARCH AND DATA COLLECTION**

To ensure the greatest possible social impact of measures designed to broaden the accessibility of higher education, policy-making must rely on high quality research and involve the participation of representatives of affected populations. Specific mechanisms should be put in place to ensure diversity and to guarantee equal opportunities within Higher Education. Thorough research must be conducted to explore what is keeping people from varying backgrounds and conditions from accessing, transitioning within, or completing Higher Education. In addition, comprehensive policy measures must be put in place to remove these barriers. Policies and initiatives intended to widen access to Higher Education should target people in all stages of their lives. Also, research should help policy makers understand what 'underrepresented groups' consist of, and provide examples of people that are underrepresented or are seen as coming from 'disadvantaged backgrounds'.

However, the potential effects that social research can have on vulnerable populations must always be taken into account. Care should be taken to avoid essentializing social groups. The development of methodologies of data collection should involve the participation of people from varying backgrounds to provide feedback on practices of categorization based on group identity.

Furthermore, careful attention has to be paid to the security of every individual data, this means to ensure proper data protection and to anonymize data. This is of special importance when it comes to the safeguarding of minorities and groups that are discriminated against and it should generally be the ethical foundation of research and data protection.

## **EARLY STAGE INTERVENTIONS**

Alongside this, there should be a fostering of greater understanding about how Higher Education systems (and education systems overall) feed into inequality, exclusion, disadvantage and polarization within societies. Research concerning barriers and representation within higher education shouldn't be limited to affordability. Rather, it should delve into prospective students' reasoning on whether to enter higher education, what field to study in, what type of education to seek, and other such concerns. These choices, and the student's freedom, or lack thereof, in making them, greatly affect their future as well as the society at large. Early stage interventions are a key mechanism to achieve the goal of widening access and participation in Higher Education. From an early age on, such as already in primary and secondary education systems and based on research, both direct and implicit barriers to enable the access to Higher Education must be removed, along with cultural and social barriers restricting access and choice for students. This also applies to prospective mature students, and those on different education paths. Guidance programmes, academic goal setting, tutoring, first year transition programs, learning communities and other such mechanisms should support students upon entering HE, and help them in their path to completion. ESU believes that the admission system into higher education should ensure equal access to students from all backgrounds. The admission system at HEI's should contribute to greater social mobility and should not solely be based on grade average, entrance exams and standardised testing, which can be in favour of students from more privileged socio-economic background. ESU calls for universities to use more diverse methods of admissions that cater for people from diverse secondary education backgrounds.

## **RECOGNITION**

Another key aspect of widening access to Higher Education is putting in place simple, flexible, effective, non-discriminatory and comprehensive recognition procedures, both for formal and non-formal prior learning, and for other previously gained competences. Barriers encountered in seeking recognition disincentivize potential students from entering Higher Education. Mechanisms used to monitor the causes of inequity in accessing Higher Education should also be used to constantly

improve recognition processes, to ensure access to them for everyone. It is very important that there is constant communication and collaboration between HEIs (higher education institutions), national authorities, recognition agencies, student representatives and other stakeholders in order to create more suitable and efficient conditions for students. In addition, the staff dealing with this area needs to have the necessary training and knowledge to ensure transparency and fairness of these processes.

Improving recognition procedures is also of crucial importance for including refugees, displaced persons, and people in refugee-like situations in Higher Education. Barriers to providing proof of prior learning are often encountered if documentary evidence is incoherent or not in hand, in accordance with Article VII of the Lisbon Convention (1997) adopted by the Council of Europe under European Treaty n. 165. Efficient and fair procedures should be in place to comprehensively assess whether these potential students fulfil the relevant requirements to access higher education. That is why ESU supports the involvement of all the countries within the EHEA in and the recognition by HEIs of the project of the European Qualifications Passport for Refugees<sup>5</sup>. On this line, it is important to recognise the value of self-assessment, as well as to provide individual counselling, allowing the individual to take ownership of the process. It is important to provide individual counselling, allowing the individual to take ownership of the process, as well as to recognise the value of self-assessment. The development of National Qualifications Frameworks (NQFs) within Europe is a very positive move in terms of assisting migration through recognition of a standard qualifications framework. It is however extremely important that NQFs and accrediting bodies allow some flexibility within the NQF, and that resources are made available for interpreting and explaining the frameworks to newly arrived communities. It is also important to promote initiatives to facilitate refugees' access to universities, working with HEIs and governments, granting scholarships to refugee and asylum seeking students with the adhesion of more European countries to the experience of U4Refugees programme, in partnership with UNHCR.

## **FAIR & SUPPORTIVE ENVIRONMENTS FOR STAFF**

Keeping in mind the importance of the staff, who are employed in Higher Education Institutions, we should fully acknowledge the necessity for fair and supportive work environments, which allows and encourages them to grow, develop and foster the same fundamental values outlined in this policy. We must recognize that staff working conditions directly relate to student learning conditions. Issues such as

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<sup>5</sup> The European Qualifications Passport for Refugees is a document providing an assessment of the higher education qualifications based on available documentation and a structured interview. (<https://www.coe.int/en/web/education/recognition-of-refugees-qualifications>)

precarity, low pay, attacks on pensions and gender and ethnic minority pay gaps are not in the interests of staff and students. As the society and HE is changing rapidly, mechanisms should be in place to analyse the needs of staff and to ensure proper training for people working in HEIs, to equip them with sufficient resources and qualifications as well as teaching, language, and interpersonal skills. In addition good working conditions in HEIs will help to foster the diversity among the staff members because vulnerable groups are in many situation less likely to take the risk of pursuing a career in academia. This would again have a positive effect on the diversity of students.

## **STUDENT SUPPORT SYSTEMS**

Before even tackling the issues related to costs and affordability of higher education, and as mentioned with regards to widening access to Higher Education, there is a strong need for adapted guidance systems and accurate information. This is crucial from the point of view of accessibility: the diversity of prospective students' backgrounds needs to be fully understood and taken into account by HEIs, especially when communicating about their programmes, in order to include as many potential students as possible and maximize the likelihood of completion. Accurate guidance and information when considering entering or continuing in HE will lead to students being able to choose what type of higher education, as well as what programme would suit them best. Those responsible for delivering student guidance should have the possibility to be trained accordingly, in order to ensure their services are adequate to the needs of a diverse student population.

The affordability of higher education is often mentioned when discussing the social dimension of higher education, especially from the point of view of accessibility and completion. However, affordability needs to be understood as a broad concept, containing all sorts of financial and material aspects of education. These aspects, or costs, can be divided into two categories: direct costs, and indirect costs.

### **DIRECT COSTS & TUITION FEES**

The direct costs include everything that is directly linked to the programme chosen by the student: tuition fees, books, tools and materials necessary for class work practical learning experiences, exams and research, among others. In this regard, support systems can be established in order to help less advantaged students to cover their tuition fees, buy materials needed, or mitigate other costs. These are the support systems that are often the most talked about when tackling financial accessibility. They are much needed - having to pay tuition fees, or purchase a number of books at the beginning of a semester can become a barrier for less

privileged students, for instance from socio-economically disadvantaged backgrounds. In order to enable everyone to study, it is essential that systems are set to help them cover these direct costs.

## **GRANTS & LOANS**

In accordance with the International Covenant on Economic, Social and Cultural Rights, Article 13, ratified by a large part of international actors, it is crucial to reaffirm that, eliminating tuition fees is the simplest and best way to improve the accessibility of higher education and ESU stands strongly in favour of this being the goal of every higher education system. Keeping this in mind, even systems with no tuition fees often place financial burdens on students through indirect or hidden costs. In any case, removing all tuition fees is not the final step towards having an inclusive HE system and countries should provide enough financial support for students to be able to sustain themselves and compensate the direct and indirect costs of studying. Grants should be the main solution set by states to support students. They should be sufficient to enable students from any background to undertake and complete their study programme in the best conditions possible. These grants should also reflect costs of living in the location of study and the amount should be regularly updated. Student groups with additional fixed costs (e.g. students with caring obligations, students with children) need to have additional financial support through additional grants or similar systems.

ESU is strongly in favour of the establishment of grant systems over loan systems - loan systems only reflect a failure by the state to provide a sufficient grant system and public services while grants are the most preferable way to invest in the future of the citizens of a given country because it does not create a debt for the students who are already the most in need of financial support. Grants do not only guarantee more accessibility to higher education, they also enable students to have more chances of completing their studies, as they lessen the likeliness of having to work an excessive amount of hours to earn enough money to sustain a decent living standard. Whether through grants, free or subsidized services, or any combination of these, states must ensure that students from any background are able to undertake and complete their studies. ESU also maintains a strong position that loan systems are not a replacement at all to these obligations of the states. Student support mechanisms, such as grants, should not be given based on performance criteria, such as academic merits, but should be applied universally.

## **INDIRECT COSTS: HOUSING & TRANSPORT**

The indirect costs of higher education are less often mentioned than the direct ones. Less visible at first glance, they can prove to be one of the many barriers to higher education. Two of the most important indirect costs are housing and transportation.

Regarding housing, three principles must guide policy aimed at it: affordability, accessibility and sustainability. States must make sure that anyone who wishes to study in Higher Education has access to an affordable place to live. This can be achieved through designated student housing, but in cases where that isn't sufficient, policies and systems must be in place to ensure affordability in the rental market.

States have an obligation to actively ensure that enough affordable and accessible housing is available. When considering availability, the variety of housing should also be kept in mind, to ensure access to Higher Education for people with varying needs regarding housing. This affects especially those students with accessibility requirements, since regular rental markets are often unable to meet their needs, and they often face discrimination and exclusion. Similarly, both short-term and recurrent temporary housing needs to be available for mobile students, students traveling between campuses for studies, and students with other such needs. Finally, the quality and environmental sustainability of the housing is of utmost importance. Any housing meant for students needs to provide facilities needed to sustain a decent life, be up to high construction standards, properly heated, and clean. Students should not be forced out of their student housing at any point during the length of their study period. Ideally, there should also be a buffer period after the studies have ended.

People from disadvantaged or marginalized backgrounds have to be meaningfully included in decision making over design of student housing and infrastructure for student use, as well as policy making within the same field. States need to work proactively to guarantee a legal environment that prevents discrimination, fraudulent practices, and exploitation of students seeking housing. Access to housing has to be free from any discrimination, unnecessary hassle, and struggles. Special protections must be in place for prospective students who are at a higher risk of encountering racism, xenophobia, and exclusion due to their background or accessibility requirements. Everyone starting their studies or moving anywhere to study should feel secure in their access to housing.

Another indirect cost of education, and a potential obstacle to access to higher education, is transportation. Affordable, accessible, sustainable and efficient transport options must exist for students, to ensure equal access to Higher Education. Public transportation needs to be free for students regardless of their age. Here too accessibility requirements must be an essential concern in the design of transport networks. Transport must be accessible to all, including those from

disadvantaged background and/or having specific needs such as those with physical disabilities or caring for dependents.

## **MENTAL HEALTH & SUPPORT SERVICES**

The uncertainty of the fulfillment of one's basic needs also takes its toll on mental and physical health, with both of them being essential to succeeding in one's studies. Thus, access to comprehensive and adequate health care is required. Specific student support systems need to be available without financial burdens, as good health and wellbeing, whether mental or physical, should not be a luxury but a right. It is important that, when students make use of these support systems, their anonymity is always guaranteed, except in cases where the medical practitioner is required by law to breach confidentiality. It is up to the states, but also to the HEIs to provide adequate support in this regard. HEIs also have a responsibility to their students regarding mental health. The rhythm of studies, the pressure weighing on the students, a competitive environment, the fact that in most cases, Higher Education is designed for neurotypical people without taking into account the diversity of experiences and conditions, can all be substantial barriers to access, transition and completion. This has the effect of systematically excluding many from less privileged backgrounds and conditions, or making success in Higher Education harder to achieve.

Sufficient information on the available support systems must be provided - students must not be restricted from accessing these due to non accessible administrative paths, too long bureaucratic delays or due to the lack of awareness of the existence of such systems where they actually exist. To this day, societal stigma remains arguably the most prominent barrier to an individual accessing support for mental health difficulties. We must take into account how many societies have stigmatised mental health in the past, and how that subsequently has a knock-on effect on society today. We must engage actively in breaking down the stigma surrounding mental health in order to ensure those who need help feel comfortable reaching out, ultimately improving accessibility to mental health supports. In order to ensure the compatibility of Higher Education with care responsibilities, it is essential that special support services are provided for these students. Automatic enrollment and opt-out systems need to be preferred to prevent placing undue burdens on students and HEIs. Guidance needs to be provided to ensure that all are treated equally and can access the same amount of support if eligible and available.

## **FLEXIBLE LEARNING PATHWAYS**

Study programmes should be designed to be responsive to the diverse needs of students that have to reconcile studying with other commitments, such as work or family life. Besides the need for flexible forms of programme delivery, teaching methods should also be sensitive to and accommodate the diverse learning styles of mature students such as through recognition and utilisation of their prior experience and use of multidisciplinary approaches to learning. Designing flexible learning paths to enable people to enter or return to higher education without the need to interrupt their employment or caring duties is beneficial to their career progress and self-development, and a key factor in facilitating broader upward social mobility.

## **STUDENTS' EMPLOYMENT**

Students should be able to sustain decent living standards and afford their studies without having to work alongside their full-time programme. Student employment can raise concerns about the impact on academic achievement due to reduced time available for studies, and the impact on the quality of the student's educational experience, stress levels and mental health and overall completion rates<sup>6</sup>. Financial barriers faced by students through both direct and indirect costs of HE should be removed through social support systems. However, should some students wish to work alongside their studies, particularly if it has a positive impact on their academic achievement or personal development, they shouldn't face disadvantages or obstacles in their studies or work. In need-based social support systems for students, laws and practices should be in place to avoid either discouraging students from working in cases when they wish to work (e.g. systems where even minor income from work leads to distinctively lower social benefits), or creating distinctive incentives for students to work during their studies (e.g. systems where working students gain special benefits, either directly or indirectly). Working students' rights must be aligned with the country's highest standards related to labour regulation.

## **STUDENT CENTRED LEARNING**

Student centred approaches in learning and teaching play a crucial role in creating inclusive higher education systems responsive to the diverse needs of all students. A strong connection between student centred learning (SCL) and the social dimension of higher education should be reflected in the creation of flexible learning pathways, as well as curricula design, and innovative pedagogical methods. All three should strive to respect and meet the individual needs and goals of students, based on mutual respect between student and teacher in the learning situation. This way, the narrative of each student becomes an important part of any learning process, enabling students to have individualized learning paths, study at different paces and

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<sup>6</sup> Curaj, A., Deca, L. and Pricopie, R. (2018) *European Higher Education Area: The Impact of Past and Future Policies*. Springer International Publishing.

in different situations in life. SCL is fundamental to establishing inclusive practices within HEIs. Besides actively engaging students within their academic communities and fostering the values of active citizenship and democratic participation, SCL can also lead to a significantly higher quality of education and improve student retention rates in higher education institutions<sup>7</sup>.

## LANGUAGE

With a more diverse population of prospective and active students, stemming from the effects of increased immigration and demographic changes and a concurrent push to include currently under-represented groups in HE, it is crucial that language barriers restricting access and inclusion be addressed and overcome<sup>8</sup>. HEIs must reflect social diversity by fostering multicultural and multilingual learning environments aimed at facilitating the inclusion of students from all backgrounds. This firmly entails offering comprehensive, free, effective and accessible language learning programmes to all domestic and foreign individuals, including refugees, displaced persons and people with refugee-like status who require such support, to ensure sufficient proficiency in the language(s) studies are conducted in, in order to facilitate their entry to higher education. In addition, sufficient language support during studies should be available to the student throughout their studies and integrating progressively advancing language studies into the curriculum should be a key consideration. Furthermore, universal design must be an inherent practice in processes ranging from compiling study materials to designing infrastructure. Support systems must also be designed to include students with accessibility requirements in HE, with quality of education or experience not suffering in the process.

In the process of increasing internationalization, the English language has gained an important role within HE<sup>9</sup>. However, the right of students to learn, to study and to be taught in the national language(s) must be firmly protected and supported with the required financial and organisational resources. Furthermore, the rights of minority language students, as well as prospective students with minority language backgrounds, need to be protected in HE systems. Degrees and programmes offered in regional or minority languages shouldn't be restricted, sufficient financial means should be available to support these and they must be subject to the same

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<sup>7</sup> Attard, A., Di Iorio, E., Geven, K. and Santa, R. (2016) Student Centred Learning: Toolkit for Students, Staff and Higher Education Institutions. Brussels.

<sup>8</sup> Ó Maoláin, A., Popescu, C., Bergan, G., Sallinen, J., Savola, P., de Bruijn, S., Dalen, S., Servant, T. and Grønne, V. (2016) Handbook for National Unions of Students on Students with a Migrant or Ethnic Minority Background. Brussels.

<sup>9</sup> Garrett, P. and Balsà, L.G. (2014) International universities and implications of internationalisation for minority languages: views from university students in Catalonia and Wales. *Journal of Multilingual and Multicultural Development*: 35 (4), pgs 361-375.

quality standards as others. Attention should also be paid to ensure sufficient multilingual competence of teachers and staff in HEIs.

## **LIFELONG LEARNING**

In order to adapt to diverse populations and the needs of society, lifelong learning opportunities should be accessible to anyone at any point in their life and should be considered a pathway to improved quality of life. Lifelong learning incorporates any formal, informal and non-formal learning processes that can serve as tool in enabling individuals to achieve their personal and professional ambitions, regardless of one's social status. Lifelong learning is an important factor of upward social mobility, and functions to reduce social inequality across all of society while enhancing the societal academic rate. As employment habits are prone to rather rapid changes and, in tandem, changes in society emphasise the importance of personal development as a continuous process, HE systems should promote lifelong learning as a means to achieving universal access and dynamic learning environments. Flexible learning paths and the recognition of prior learning are indispensable tools in the proper function of lifelong learning. Furthermore, there should also be an interdependence between the higher education sector and their wider social communities through open dialogue that allows societal partners to produce new learning pathways for the wider community to participate in higher education systems.

## **CONCLUSION**

The Social Dimension of Higher Education needs to be seen by all stakeholders as a core value and priority in the policy area of Higher Education. Prioritizing the Social Dimension is an essential step in creating the kind of society we students strive for. A society that is equal, intelligent, diverse, safe, prosperous, and sustainable. In this process, as in the process of creating and implementing all of the policies and practices outlined above, certain principles must be upheld throughout.

One such principle is that a broad, intersectional understanding of access must be at the center of considerations at all times. In order to achieve free education for all students, it is not enough to abolish tuition fees, if a lack of available housing, or high rental costs mean that those from disadvantaged backgrounds will be forced to work throughout their studies, or avoid HE altogether. A student loan system is broken, if it leaves students with debt that is only manageable to those with stable financial situations, or those coming from a wealthy background. Policy making in a way that focuses on access is undoubtedly more difficult and burdensome than the alternative of using one-size-fits-all measures, but it is essential if we wish to stop excluding people from facets of society meant for everyone.

In this quest, principles of representation, inclusion, and dialogue are just as important. It is a self-evident truth, that if policy is made, or systems designed that will affect certain people, they must be able to participate in these processes. In this context, students' representation in decision-making has to be inherent. Further than that, and given that people from marginalized backgrounds and conditions are often disregarded or lack power, a consistent culture of inclusion has to exist in policy-making.

Ensuring that every person within our society has the opportunity to further their education is not only fundamental to eradicating historically entrenched social inequalities, but also adds value in strengthening democratic societies and sustainable economies. That is why the social dimension, and the centrality of an inclusive, diverse student body needs to be considered as a priority by governments, HEIs and educational stakeholders in all their policies.