

# **ESU's position on the European Degree (label)**

## **I. Summary**

ESU welcomes the public consultation on the establishment of a European degree (label). The European degree (label) could serve as a meaningful tool to support the creation of joint degrees and incentivise the removal of unjustified barriers for international cooperation, thus enhancing the quality of education.

ESU considers that the most important work to be undertaken is the full, swift and comprehensive implementation of Bologna tools. This should be done by closing the implementation gap and completing the arch of reforms within the Bologna Process. Promoting joint degrees is only one of the measures to establish a more interconnected European (Higher) Education Area and internationalisation measures should be expected in all higher education systems and institutions.

Nevertheless, ESU believes that the creation of the European University Alliances has offered a long-awaited boost in the internationalisation of higher education in Europe.

What matters for students is that their joint degree leads to relevant, coherent learning outcomes, incorporates and combines good practices from various higher education institutions, offers unique international opportunities and includes up-to-date curriculum which fulfils their personal aspirations, their needs for professional development and can offer added value on the European labour market. Students expect that such programmes are automatically recognised, offer flexible learning opportunities and pathways, are inclusive and student-centred, create true inter-university campuses and that the student is supported along the pathway to progress in and complete the study programme. The value of a European degree (label) would still need to be communicated to students and the wider academic community.

ESU believes that the main rationale of a European degree 'label' should stand as a proof of successful compliance with Bologna tools and commitments and international cooperation, thus also enhancing the quality of education provision and further promoting mobility and its benefits. The European Degree (label) should in no way create a two-speed Europe, where national programmes or joint programmes without the denomination of European degree 'label' are considered of lesser quality. All study programmes in Europe are 'European' by the

compliance with Bologna tools and should abide by the same quality assurance standards, stemming from the ESGs, and the creation of a European degree 'label' cannot be seen as a ranking exercise which leads to a perceived mark of 'excellence' of the European degree 'label'.

Considering the proposed criteria, the European degree (label) does not imply, through its only deployment, that the joint degrees receiving such designation will be by default innovative, offer novel approaches or would adequately implement cohesive, well-rounded study programmes, including well-defined mobility opportunities. Additional effort, as well as support for Alliances would be needed to actually make it a reality.

The European degree (label) must be founded on the fundamental values of the European Higher Education Area and promote an upward convergence of student rights and conditions across the higher education systems. Its delivery should be available for all the Higher Education Institutions across the EHEA.

ESU believes a decision towards establishing now fully-fledged European degrees would be premature. The label might eventually prove to be insufficient, turning into an additional paper without the desired impact, but the extent to which the label would not be sufficient to achieve the objectives of easing international cooperation could be determined after its proper piloting in practice and assessment. Without adequate guardrails, a European degree could risk creating de facto parallel higher education systems, in which even unintendedly national regulations meant to protect student rights could be waived for the purpose of supporting transnational cooperation, without any European replacement in place. In this context, crucial attention should be paid to admission systems, student participation and financing the joint degree, with solutions proposed by ESU below. We also propose concrete changes for the criteria proposed for the European degree (label).

Alliances and other HEIs should be supported in implementing the tools, including through adequate guidance and funding.

## **I. General remarks about the spring 2024 higher education package**

ESU welcomes the ambitious developments on the topics put forward in the spring 2024 higher education package, especially in the light of creating an

enabling framework for a shared understanding and implementation of EEA, as well as the several rounds of consultations organised by the Commission in this regard. Nevertheless, we want to draw attention to the fact that essential pieces of the puzzle are still missing and without which a well-rounded and functioning EEA cannot be achieved, such as the **inclusivity framework** and a **framework for adequate student participation**. These topics are sine-qua-non conditions for an EEA that delivers for students.

We highlight that the documents within the spring package, as goes with the whole EEA, should have as a **starting point the policies, practices and commitments within the Bologna Process** and should aim to support and enhance the implementation of the Bologna Process, without creating diverging or parallel practices. This is especially important regarding commitments linked to quality assurance, recognition and joint programmes, even more so that for quality assurance an entire architecture and coherent, well functioning system has been built within the European Higher Education Area (EHEA).

Furthermore, a balance must be struck in terms of the scope of intervention of the spring package documents. On one side, it is expected that additional emphasis is put on elements related to transnational cooperation, where EU added value is most obvious, and to instruments or initiatives stemming from EEA itself (such as European University Alliances or a common approach to microcredentials). On the other side, the **EEA and the values it underpins must impact and leverage all students and higher education institutions**, irrespective of the place or conditions of study, and as such policy initiatives linked to quality assurance and recognition, academic careers or rules related to joint programmes must be **broadly applicable in all circumstances**, considering the additional need for intervention in relation to what already exists.

Finally, while there may be convergence in objectives among various policy-makers and stakeholders, the ambitions of the proposed initiatives should be complemented by additional effort in getting on board the grassroots academic communities, aiming to reach a common, more concrete long-term vision of EEA and its initiatives.

These general principles, stemming from previous statements and resolutions adopted by the Board of ESU on the EEA or its components, will guide ESU's contribution below to each of the three components of the package.

## **II. About transnational cooperation in higher education through joint programmes and the European Degree (label)**

### *Joint programmes and the Bologna Process*

Promoting internationalisation through enabling conditions for the creation of joint programmes has been a hallmark of the Bologna Process since its inception. If well designed and properly implemented, joint programmes offer students opportunities for enrolling in study programmes which combine the practices, resources, and paradigms of various higher education institutions across Europe, leading to enhanced quality, a more diversified curriculum containing state-of-the-art knowledge and innovative learning and teaching practices, while maintaining the whole and overarching benefits of international physical credit mobility. In comparison with credit mobility within a national study programme, the institutionalised cooperation between higher education institutions in delivering a joint programme offers a more systematic design of the learning process in achieving a qualification and smoother learning experience for students, that builds upon the international mobility experience.

**Despite several commitments within the Bologna Process**, evidence shows that the number of joint programmes in higher education has not significantly increased in recent years. This has been explained, at least in part, by the **remaining barriers, especially in national legislation**, to the delivery of joint programmes.

**Some of these barriers are related to the lack of implementation of already existing tools and commitments.** The notorious example in this case is within the realm of quality assurance. For countries that require programme level accreditation/evaluation, to ease the burden of multiple and potentially conflicting external quality assurance procedures, the ministers of higher education in the Bologna Process adopted the European Approach to the Quality Assurance of Joint Programmes ('EA'), based on the Standards and Guidelines on Quality Assurance in the European Higher Education Area ('ESGs'). Through a single evaluation procedure, based on common European criteria, the consortium

of higher education institutions delivering the joint programme should be able to accredit/externally evaluate the joint programme.

However, according to the European Quality Assurance Register Database, only 20 higher education systems allow the use of the EA for all the higher education institutions, while 11 higher education systems in Europe allow the use of EA for some higher education institutions. This information related to the status quo needs to be combined with the fact that 17 higher education systems in Europe do not allow other EQAR-registered QA agencies to operate in their country, not considering those who allow this with certain (reasonable or unreasonable) restrictions.

The picture that emerges is that in many higher education systems, even the most 'Europeanised' policy area in terms of compatibility, quality assurance procedures, still hinders the possibility of offering joint programmes. While this can also be partly motivated by the lack of political will or interest, it also sheds light on another rationale, which will further impact the discussion on the European degree (label): many higher education systems include in their external quality assurance procedures regulations related to the structure, design or delivery of a study programme which serve a public interest role or ensure the coherence of the higher education system. By eliminating these provisions from external QA regulations and not incorporating them in other higher education legislation, certain rules which aim to guarantee the quality of education provision, structural particularities of the higher education system or even student rights would remain unprotected. This can lead to hesitation in adopting common European tools if they do not offer space for those national provisions deemed essential for the functioning of the system.

### *Change enabled by the creation of European University Alliances*

**ESU believes that the creation of the European University Alliances has offered a long-awaited boost and revival of interest** in the internationalisation of higher education in Europe, among others also by reigniting discussions about the support given to the creation of joint programmes and the merits of transnational cooperation in higher education, beyond individual credit mobility. **Creating deep, long-term institutionalised forms of transnational cooperation through the emergence of European University Alliances is offering in itself a more enabling framework** for the creation of joint programmes. However, we must also highlight

that as HEIs themselves, Alliances are expected to internationalise to a relevant extent all the higher education provision, including all study programmes offered by the member HEIs. While joint programmes are an integral part and an important aspect of the internationalisation efforts spearheaded by Alliances, they cannot be the exclusive focus in this endeavour and Alliances should be supported in their whole efforts.

However, it was both expected and proven that higher education institutions would face challenges in delivering joint programmes, mainly due to existing national regulations, for example language requirements, duration of study programme (quantified in number of ECTS), graduation examination requirements, types of assessment, windows and limits of numbers of ECTS that can be obtained in international mobility and so on.

#### *The concept of a European degree (label), rooted in the Bologna Process*

We see that both the political endeavour of delivering a degree under a shared political concept ('European'), which enforces the sense of jointness, the need to overcome these regulatory barriers and to incentivise member states to eliminate these barriers led to the proposal from the European Commission to create a 'European degree (label)', which in essence would represent a joint degree delivered under common European criteria, which would be confirmed either through issuing a 'label' for the joint degrees that comply with the criteria or would turn into a stand-alone ('European degree') qualification in the national qualification frameworks.

**ESU believes that the most important work to be undertaken is the full, swift and comprehensive implementation of Bologna tools.** This should be done by closing the implementation gap and completing the arch of reforms within the Bologna Process, among others to ensure comparability and compatibility of degrees, as well as adequate use of qualification frameworks, learning outcomes and ECTS, as well as to flexibly integrate other elements which currently fall outside of the Bologna key commitments, but are discussed within the topic of the European degree (label). Through this pursuit, challenges related to issuing joint programmes or joint degrees would be significantly reduced.

On the topic of the possible creation of a European degree (label), ESU adopted in May 2022, a [resolution on the legal statute for alliances of higher education institutions and on the European Degree](#):

- ESU highlighted that the assessment of feasibility of a European degree (label) shall be based on whether they concretely foster the implementation of Bologna commitments, as well as their added value vis a vis current existing frameworks.
- **Should the necessity for a European degree (label) be found, it must be founded on the fundamental values of the European Higher Education Area:** academic freedom and integrity, institutional autonomy, participation of students and staff in higher education governance, and public responsibility for and of higher education.
- **The delivery of a European degree (label) shall be available for all the Higher Education Institutions across the EHEA** and shall promote an **upward convergence of student rights and conditions** across the higher education systems.
- Their design and implementation at the national and institutional levels must be **coordinated with the democratically elected, representative student unions** at both levels, and must involve them in the decision-making structures in line with the best practices of internal self-governance traditions of Higher Education Institutions.

#### *Joint programmes versus joint degrees: students' perspective*

In practical terms, **ESU believes that for students the distinction between a joint programme and a joint degree is a matter of technicality rather than practicality.** At the end of the day, what matters for a student is that their study programme, be it a joint programme or a joint degree, leads to relevant, coherent learning outcomes, incorporates and combines good practices from various higher education institutions, offers unique international opportunities and includes up-to-date curriculum which fulfils their personal aspirations, their needs for professional development and can offer added value on the European labour market. Students expect that such programmes are automatically recognised, offer flexible learning opportunities and pathways, are inclusive and student-centred, and that the student is supported along the pathway to progress in and complete the study programme. If these expectations are met and all other conditions the same, whether this leads to multiple diplomas



(through a joint programme) or to a single diploma (through a joint degree) bears lesser practical importance.

Nevertheless, **the creation of a European Degree (label) can be a mechanism to promote the aforementioned student expectations, by incentivizing countries to remove, for joint degrees, those national requirements for study programmes which are burdensome and unjustifiably limit their delivery.**

Apart from the additional, usually procedural requirements which accompany the issuing of a joint degree in comparison with the larger category of joint programmes, ESU believe this process should open up transnational cooperation whether it is leading to a joint programme or a joint degree.

### Leading to the potential added value and the scope of a European degree (label)

We welcome the extensive consultations and stakeholder engagement of the European Commission in the process of determining the concept, rationale, potential added-value and pathway to a European degree (label). We have also appreciated the possibility to contribute to several pilot projects related to the European degree (label).

From ESU's perspective, **the consultations on the topic shed light on diverging views about what the European degree (label) should entail and still overall lack of clarity.** Nevertheless, we see a **consensus** around the fact that the European degree (label) should **promote transnational cooperation through removing undue barriers** and should manifest the 'jointness' of such cooperation.

ESU believes that the creation of a **European Degree (label) should in no way create a two-speed Europe, where national programmes** or joint programmes without the denomination of European degree 'label' are **considered of lesser quality. All study programmes in Europe are 'European' by the compliance with Bologna tools** and should abide by the same quality assurance standards, stemming from the ESGs, and the creation of a European degree 'label' **cannot be seen as a ranking exercise** which leads to a perceived mark of 'excellence' of the European degree 'label'. It is crucial to acknowledge that the overwhelming majority of students will not enrol in European degrees, and their rights to quality higher education, including with international components, is not a lesser dimension in a two-tier system.

Furthermore, **the creation of a European degree (label) should neither chip away funding** from Erasmus Mundus programmes or for Erasmus+ funding allocated to international mobility, nor reduce funding for national study programmes.

**ESU believes that the main rationale of a European degree 'label' should stand as a proof of successful compliance with Bologna tools and commitments** in the case of joint programmes, through the materialisation of common criteria which include quality assurance, adequate usage of ECTS, promotion of inclusive policies, student-centred learning and so on. **The designation as a European degree 'label' would give impetus to the adequate implementation of Bologna tools in the national** higher education system and their take-up by higher education institutions. While keeping in mind that the same expectations, of implementation as related in the mandatory and optional criteria, should mostly apply also to national study programmes, and the implementation of Bologna tools and commitments is incumbent to all systems, the European degree 'label' would **motivate the creation of joint degrees**, thus also incentivising the promotion of Bologna tools in the whole higher education institutions and **enhancing the quality of education provision**. This also points further to ESU's opinion that as ECTS system or the Lisbon Recognition Convention, the potential European degree (label) **should be integrated into the Bologna ecosystem**.

The nature of the European degree 'label' as an enabler for the implementation of Bologna tools can also be evidenced by the list of mandatory criteria proposed by the European Commission, which mostly serve as minimum, basic conditions for the fulfilment of Bologna commitments and are mainly integrated in the European Approach to the QA Assurance of Joint Degrees. On the other hand, the optional criteria, while generally moving further from the key commitments within the Bologna Process, are still embedded in objectives mentioned in Ministerial Communiques.

This points out to the conclusion that European degree (label) does not imply, through its only deployment, that the joint degrees receiving such designation will be by default innovative, offer novel approaches or would adequately implement cohesive, well-rounded study programmes, including well-defined mobility opportunities. While partly these are covered within the QA system, included in the proposed mandatory criteria, additional effort would be needed to actually make it a reality.

### European degree label versus European degree

In its proposal to the Council, the Commission put forward potential paths of the evolution of the concept of the European degree from a label to a full-fledged degree, part of the national qualification frameworks of the member states.

While we acknowledge this would more easily reduce barriers in the delivery of joint degrees, especially towards different denominations, professional requirements for sector-specific degrees and recognition, it would promote European visibility in a global perspective, considering the whole risks of pitfalls and concerns mentioned below which at this point are not in the phase of development to be comprehensively addressed, **ESU believes a decision now towards establishing now a fully-fledged European degree would be premature.**

In practice what matters for students is the transformational improvement in the delivery of joint degrees, their usefulness and quality rather than different technical distinctions, be the delivery of the European degree on an additional document serving as a label (for example in the Diploma Supplement) or integrated in a concept of a European degree within national qualification frameworks.

**The label might eventually prove to be insufficient**, turning into an additional paper without the desired impact, **but the extent to which the label would not be sufficient to achieve the objectives of easing international cooperation could be determined only after its proper piloting in practice and assessment.** This also is related, however, to the impact desired by stakeholders, and ESU reiterates its view that a **European Degree should not be seen as a sign of elitism.**

However, even more so than a label, a European degree could **risk creating de facto parallel higher education systems**, in which even unintendedly national regulations meant to protect student rights could be waived for the purpose of supporting transnational cooperation, without any European replacement in place. While acknowledging the importance of ambitious targets, such a process should be treated **carefully and only in a step-by-step approach, in order to uphold student rights and the guarantees** embedded in higher education systems.

## *Pitfalls and concerns about a potential European degree (label) that must be addressed*

As evidenced by the studies commissioned by the European Commission or within the European degree pilot projects, there are several national barriers still in place for the delivery of joint degrees.

Some of them relate to the implementation of key commitments, for example in areas pertaining to quality assurance or the use of ECTS. Others are what we would call 'procedural', for example related to the possibility to issue joint diplomas or diploma supplements, or conditions related to mobility windows. In the end, some of the barriers are of substantial nature, for example related to language requirements.

In the approach to support the delivery of joint degrees, the member states would be expected to create derogatory regulations which would either fully waive or adapt national provisions for joint degrees, to ease international cooperation. While for most of these barriers, the direction towards removing them seems clear and this would generally not create overarching problems, **there are other types of regulations, representing barriers on the substance of legislation, which have the potential to undermine student interest** and overall principles of higher education systems. With the most relevant examples outlined below, in such cases there should be a separate analysis of what can be waived from national legislation for joint degrees and what is considered of primary public interest or necessary for guaranteeing student rights or international commitments and cannot be derogated from. The alternative is a 'race to the bottom' which offers flexibility for international cooperation through deregulation, but it completely fails the intended purpose by potentially risking student rights.

**Admission systems:** member states have different approaches towards access to higher education. While for some of them no entrance exams are required or proactive measures are in place for inclusive admission systems, others have selective policies for access. The expectation to use common admission systems, corroborated with waiving national regulations on admission for joint degrees, could create spill-over effects towards more selective practices in open higher education systems.

**Student participation:** the student involvement in the governance of higher education institutions (at institutional and faculty level) and in the design and delivery of study programs is regulated in national legislation, at various degrees, in most member states. This is not the case for many European University Alliances, where still there is a deficit of (democratic and meaningful) student participation. Even if there are requirements related to student consultation, there is a high degree of possibility that without adequate guardrails in place, the overall student participation in governance for joint degrees would decrease. This can be compensated only through adequate regulations for the involvement of students in alliances at European level.

**Financing of the joint degree:** part of the wider issue of policies related to social dimension, which need to be addressed in the upcoming inclusivity framework of the EEA, one of the most clearcut issues related to the joint degree is its financing. ESU believes that education should be free of charge: that is why it aims for the European degree to work towards using the best practices and the benchmarks of student conditions from the different members of the alliances.

However, despite the issue of having students enrolled in the same joint degree with different financial conditions, in any case a student should not pay if enrolled in a HEI from a system where HE is free and should not pay higher tuition fees than their national peers, where tuition fees are in place. In no way the creation of joint degrees should establish breaches into free or very accessible higher education systems by allowing for the charge of tuition fees or, where they exist, the establishment of higher tuition fees.

While the most straightforward way to ensure the accessibility of the European degree is to make it universally free (with support from European funding), one alternative potential way to offset the presumptive additional costs for the delivery of joint degrees is a mechanism through which the member states maintain the level of funding for student enrolled in the joint degree on par with the funding allocated to students enrolled in national degrees, and the difference necessary to maintain higher education free (or, at least, not increase tuition fees) is compensated through Erasmus+ funding allocated to the higher education institutions. This would nevertheless create other practical challenges: on the one side, there is the risk of Erasmus+ funding drying out, without the possibility to cover students from all joint degrees. On the other side, where the costs are shared within the members of the alliance, the determination of

national funding could prove difficult and thus could create opposition from member states.

Finally, the grants or loans available for students enrolled in national study programmes should be equally available to students enrolled in joint degrees.

### III. About the criteria for a European degree (label)

ESU believes a balance must be struck on the criteria for the European degree: on the one side, they must be sufficiently precise in order to guarantee the minimum condition for the effectiveness of designing and delivering joint degrees, and removing associated barriers and incentivises policy changes, on the other side not too prescriptive in a way that would stifle the diversity of approaches and higher education systems.

In relation with the mandatory criteria proposed by the European Commission, ESU proposes the following additions/adjustments:

- The higher education institutions involved have set a **consortium agreement** that defines joint arrangements for admission, selection, supervision, monitoring, **progression**, assessment and recognition procedures, **including recognition of prior learning**, for the joint study programme.

We believe these arrangements should be placed in the consortium agreement, in order to ensure their stability and consistency. Furthermore, we propose adding 'progression', which relates to criteria for retaking exams, prolonging the study period and so on, as well as recognition of prior learning, which is a commitment in the Bologna Process and evidenced in the 2012 Council Recommendation on the validation of non-formal and informal learning.

- **Democratically elected students' representatives are part of the decision-making process to define the joint arrangements and in its implementation.**

We cannot stress more the importance of democratically elected student representatives' involvement in the decision-making process for defining and implementing the joint arrangement for the European degree (label). This would

ensure adequate participation, in line with student participation as a fundamental value of the Bologna Process as (to be) defined within EHEA and the 2022 Council conclusions on building bridges. Students' engagement would increase their interest in the joint degree and ensure it considers their needs.

- Students have access to services in all participating HEIs in equivalent conditions as all enrolled students, **including services such as accommodation, academic guidance and psychological services, digital infrastructure.**
- The joint programme is described in ECTS, **determined according to the ECTS Users Guide.**
- The joint programme **ensures** wide participation through socially and geographically inclusive admission **and student support systems** through tailored measures for all categories of disadvantaged students. **The joint programme does not include tuition fees** (alternatively: **The arrangements for financing the joint programme do not put students in a worse condition than the financial arrangements for equivalent national study programmes**)
- The joint programme **uses student-centred approaches, fosters flexible learning paths**, embedded interdisciplinary and/or intersectoral components **and acquisition of transversal/soft skills.**
- During the joint programme, each student is exposed to at least 2 different languages **within the study programme.**

There should be active exposure to the languages. Also, we propose eliminating 'official EU languages' as this should be applicable to the whole EHEA.

Addition to the mandatory criteria, considering the missions of higher education:

- The joint programme offers the possibility for students to participate in activities promoting democratic values and addressing societal needs of the local community(ies), including volunteering, and to receive ECTS for it.

Finally, for one of the optional criteria, we propose the following addition (in bold):

The joint programme offers the opportunity to receive and combine micro-credentials, **based on the criteria in the Common approach to microcredentials.**

#### **IV. About the issuance of the European Degree label**

The European degree (label) should be available for any type of institutionalised cooperation between any HEIs in EHEA. The possibility to issue the label/degree should be given after successful completion of an external QA review:

- At alliance level, by a QA agency registered in EQAR, based on a dedicated QA framework adopted at European level, in line with and stemming from the ESGs, which includes criteria related to the use of the European degree (label);
- As an addition to the European approach to the QA of joint programmes, where there is no alliance of HEI involved or when the accreditation/external evaluation of a single joint degree is required.

After testing the European degree label for the joint degrees, similar arrangements, if deemed necessary and appropriate, could be used for other types of joint education delivery, for example microcredentials.