Bologna with Students Eyes 2024

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Foreword

We are honoured to deliver this anniversary 10th edition of the Bologna With Student Eyes.

The strong commitment of ESU to making EHEA a reality for students translated into starting the tradition of publishing the Bologna With Student Eyes (BWSE) series. The first edition was prepared in 2003 for the Berlin Ministerial Conference. Now spanning over twenty years, reading the Bologna With Student Eyes can comprehend the history of the Bologna Process itself.

ESU continues to play its role of a critical yet constructive eye by pointing out, throughout this publication, both where the stakeholders involved in the Bologna Process should be proud of what we have achieved so far and where there is still work to be done. But even more, this edition calls for bringing the EHEA back to the forefront of the profound transformations happening in Europe.

Offering insights from the perspectives of 37 national unions of students from across Europe, we are confident our publication will serve as a relevant source of inspiration for decision-makers on how Bologna should move forward.

We would like to send our warmest thanks to those who supported this publication: the ESU membership, which provided information; the ESU Executive Committee in the 2022-2023 and 2023-2024 mandates; Maria Sierra and Nuria Portero from the ESU Secretariat, reviewers, and partners from the BWSE FOR2030 project (E4 organisations, Ministry of Education of Croatia and Ministry of Education of the Netherlands).

I. Introduction from ESU's presidency

Twenty-five years have passed since 29 ministers of higher education signed the Bologna Declaration. Looking ambitiously ahead, the Bologna Process morphed into the European Higher Education Area (EHEA) and achieved a transformative power that few could have expected back then.

1999 was, in a complex fashion, still taking its vigour from an optimism of democracy, prosperity and peace across the European continent, with the fall of the Berlin Wall and its aftermath, including the integration process of Eastern Europe, still fresh in memory. This was combined with the horrendous massacres still happening in the Western Balkans, acknowledged in the Bologna Communiqué, which kept close the remembrance of the remaining steps needed to bring the continent together.

The initial rationale for the Bologna Process was to make European higher education systems more comparable and compatible so students could use opportunities for learning across the continent, be it for credit or degree mobility. The hope was that this would also increase the sense of a shared identity and a common purpose for European society, bringing countries and their higher education systems closer together. Concurrently, the Bologna Process was about making the European higher education system more competitive by showcasing its values and impact.

While the implicit beneficiaries of the reforms are students, they have yet to be at the table from the beginning, at least not by design. ESU (back then ESIB) got seats at the Bologna Ministerial Conference in 1999 through the sponsorship of UDU, the Italian national union of students. However, shortly afterwards, we established ourselves as an essential feature of the Bologna Process through consultative membership obtained in the next Ministerial Conference in Prague. Bringing stakeholder organisations on an equal footing with member states bar voting rights (nevertheless in a consensual-driven process). has been a distinguishing feature of the EHEA and a condition for its success. Despite legitimate criticism of the Bologna Process, frequently misplaced towards the Process itself rather than its meagre or inadequate implementation, the EHEA was able to bring on board the grassroots movement and to incentivise them to advocate for the Bologna reforms as part of a voluntary process, by having their representative organisations at the decision-making table.

ESU made the best use of this opportunity by pushing forward the Bologna Process through advocacy for ambitious commitments from ministers, especially in the social dimension, student-centred learning, student participation, quality assurance and, more recently, fundamental values. National unions of students were motivated to advocate for Bologna reforms in their national contexts and to monitor the implementation of the Bologna Process so that it goes beyond paper tigers into concrete, meaningful changes for students.

In 2020, the ministers of higher education agreed in Rome that they would establish an inclusive, innovative, and interconnected EHEA by 2030. A quick scan over the results of this edition of Bologna With Student Eyes, the first after adopting the '3 Is' as overarching political priorities by 2030, leads the reader to conclude that we are far from achieving these goals.
Since 2020, a cost of living crisis has affected students across Europe, outpricing students from the housing market and pushing them further into poverty. Despite progress, higher education institutions have insufficient resources and support to adjust to a changing society, with student-centred learning and teaching processes that cater for a diverse range of students, support lifelong learning and thoughtfully integrated digital practices and make the best use of deploying artificial intelligence tools, to prepare students for the world of tomorrow. We are yet to fully understand how these shaping forces may change the fabric of higher education. We have become more interconnected, but a lack of funding may risk pushing us to 'second hand' solutions such as virtual cooperation instead of physical mobility for all.

The current world is more polarised, more broken down in silos and less trustful of democratic institutions and their capacity to deliver for people. After the brutal invasion of Ukraine, Russia and Belarus were suspended from EHEA. Still, for inexplicable reasons, ministers cannot commit to expelling the Russian regime from the EHEA altogether, which bears no resemblance to our values.

Back in 2003, BWSE was quoting our 'sister' publication from EUA, Trends[1], when saying that "'[s]tudent representatives express the highest hopes concerning the principles of the Bologna reforms and the harshest criticisms concerning its implementation and frequently reductive interpretations" (p. 8).

[1] https://eua.eu/resources/publications/674:trends-2003-progress-towards-the-european-higher-education-area.html

More than two decades later, implementation is still lacking in many places around Europe. However, this speaks of a wider phenomenon where the 'voluntary' nature of the Bologna Process is sometimes equated to 'anything goes'.
'Anything goes' would undermine the essence of the Bologna Process itself. While Bologna is an intergovernmental process, the members are brought together by their actual and practical intention of implementing what they committed to and looking for new heights to conquer.

We should cherish the many successes we have achieved through the Bologna Process. But for EHEA to remain the central policy forum for decision-making on higher education in Europe and a driver for change, we must bring back its first decade's enthusiasm in finding common ground for meaningful change in higher education systems capable of tackling today's challenges.

The presidency of ESU,
Horia, Iris and Tanguy

II. Methodology

The publication Bologna with Student Eyes 2024 explores the perception of implementing the Bologna Process amongst ESU's members (national unions of students). It seeks to bring attention to the students' priorities and recommendations for the future of the Bologna Process. The publication is prepared before each Ministerial Conference, considering the period since the previous Ministerial conference, and this edition is dedicated to the Tirana Ministerial Conference, taking place in May 2024.

The publication was initiated by the presidency of the 2022-2023 mandate and coordinated by ESU's presidency for the 2023-2024 mandate. The report is part of the 'Bologna with Stakeholders Eyes for an innovative, inclusive and interconnected EHEA by 2030' (BWSEFOR2030) project, coordinated by ESU and financed by the European Commission. The project consortium includes the other E4 organisations (ENQA, EUA, and EURASHE), the Ministry of Science and Education of Croatia, and the Ministry of Education, Culture, and Science of the Netherlands.

The main source for the publication is the data received from the national unions of students (NUSes), obtained through an extensive compilation of surveys covering both quantitative and qualitative information, with questions about the state of play and the unions' perceptions. The information from NUSes has been complemented, where relevant, by data from other ESU publications or other materials, including the draft Bologna Process Implementation Report 2024.

Nine surveys were created, covering different policy areas within the Bologna Process: 1) Student participation, 2) Academic freedom & academic integrity & Institutional Autonomy, 3) Social dimension, 4) Quality Assurance, 5) Internationalisation & mobility, 6) Key Commitments, 7) Learning and Teaching, 8) Public responsibility & financing of higher education, and 9) General questions about the Bologna Process.

ESU and EURASHE created the surveys for the BWSE 2024 edition. To determine their content and ensure the relevance of the data collected, as well as the user-friendliness of the surveys, three focus groups were organised with participants from the consortium partners, national unions of

students, and Eurydice (the coordinator of the Bologna Process Implementation Report and co-chair of the BFUG Working Group on Monitoring).

As six years have passed since the last major revision of the questions (used for the 2018 and 2020 editions), they have been thoroughly reviewed to ensure their sustained relevance for the Bologna Process, new trends, and topics of concern (including issues raised in the Peer Learning Activities organised within the BWSEFOR2030 project), as well as political priorities. They have also been clarified and improved from a statistical perspective. Furthermore, the surveys have been readjusted and aligned with themes from the 2020 Communiqué and some indicators used by the BFUG Working Group on Monitoring to ensure the comparability of BWSE with the Bologna Process Implementation Report. Some questions from the 2018 and 2020 editions were left unchanged to ensure comparability with previous editions.

The surveys were closed in July 2023, with 37 NUSes from 33 EHEA members answering at least one survey. Among the EHEA countries where ESU has members, no data was received from Cyprus, Ireland, Luxembourg, Portugal, and Serbia. Additionally, the national students union MFS from the Faroe Islands participated in the surveys despite the Faroe Islands not being part of the EHEA. Nevertheless, their answers were tallied in the survey, considering previous practices of including non-EHEA members' student unions in BWSE.

Two sets of answers were received from Belgium (FEF—Belgium French Community, VVS—Belgium Flemish Community), Finland (SYL for higher education institutions and SAMOK for the Universities of Applied Sciences), and the United Kingdom (NUS UK for England, Wales and Northern Ireland and NUS Scotland for Scotland). For one survey, two answers were received from the Netherlands (ISO and LSVb).

For Belgium and the United Kingdom, as two different jurisdictions are in place concerning the competence for higher education, the answers were treated separately. As such, when the terminology considers higher education systems, the answers of FEF/VVS, respectively NUS UK/NUS Scotland,

are treated separately. In the case of Finland, when answers diverged, the authors contacted SYL and SAMOK to determine in which cases the data could converge towards one common answer, in which case no methodological obstacles persisted. Where answers diverged because of different structural elements between higher education institutions and universities of applied sciences, the country was treated as 'sui generis,' and the maps displayed in this publication show the distinctive feature. In the case of averages, the mean average between the results was calculated where relevant.

After the data collection phase and two meetings where support was given on data interpretation by Eurydice and Eurostudent, the ESU team analysed the answers and contacted the national unions of students for additional information or explanations. This phase ran between August and October 2023. Based on these answers and for 'factual' (rather than perception-based) questions, ESU decided whether to consider the answer. Where several NUSes submitted inconclusive information, the entire question was discarded. After the data curation, the results were sent to Eurydice to feed into the BPIR.

The chapters follow the divisions of the surveys, with the following changes: the survey on public responsibility and financing of higher education was merged with the survey on academic freedom, academic integrity, and institutional autonomy to form the chapter on fundamental values (while student participation, itself a fundamental value, was kept separate due to its centrality to ESU's work along the years). The information collected on the Covid pandemic and the aftermath of the Russian invasion of Ukraine were brought together under the chapter 'Higher education in emergencies.'

Each chapter has a similar structure, starting with an introduction and a summary of Bologna commitments (presenting the references from Communiqués or other Bologna tools) and continuing with the analysis of the results from NUSes, which forms the main body of the chapter. Each chapter finishes with conclusions and key recommendations, directed mainly to public authorities for implementation at EHEA or national levels. Apart from the data analysis of the surveys, the chapters include comparisons with the 2020 BWSE publication and the draft chapters of the 2024 Bologna Process Implementation Report. They reference, where relevant, ESU policies or other valuable sources of information.

The ESU team conducted the data interpretation with the support of national experts contracted for the project. The consortium members gave feedback on the final draft before publication.

Bologna process and student views

I. Introduction

This chapter aims to provide a panoramic view of how the national unions of students see the general implementation of the Bologna Process in their national higher education systems; it will describe existing systemic barriers and their views related to the future of the Bologna Process. This feedback is complemented by the overarching views of the membership of ESU unions in relation to the future of the Bologna Process, highlighted in two ESU positions adopted by our membership: the ESU vision for European Higher Education Policies (ESU, 2022) and the ESU statement on the future of the Bologna Process (ESU, 2023).

While the future chapters of the publication will look into specific policy areas of the Bologna Process, analysing how they are implemented in EHEA member states, this chapter focuses on the perception of NUSs related to the Bologna Process as a whole, as well as the extent to which they are engaged overall in the policy-making and the implementation of the Bologna commitments in their own countries.

Across the years, students have strongly supported the Bologna Process and, in almost all cases, its reforms. At the European level, ESU has advocated for the Bologna Process, pushing for wide-reaching and ambitious minister commitments. At the national level, in many cases, student unions have been most vocal in using accountability tools for incentivising member states to translate Bologna commitments into national practice, identifying the clear benefits of a genuine European Higher Education Area (EHEA). They have seen the benefits of the EHEA not only in eliminating barriers to international cooperation but also in promoting valuable national reforms for domestic students and enhancing the quality of education.

While in the first ministerial conference in Bologna, there was little student participation and no space for contributing to the Communique, ESU's (back then ESIB - European Student Information Bureau) contributions were acknowledged in the 2001 Prague Communique, where ESU played an important role in introducing the concepts of public good and public responsibility, student participation and the social dimension of higher education in the Communiqué. In the 2003 Berlin Communiqué, ESU was invited as a consultative member of the Bologna Follow-Up Group (BFUG) and to contribute to

drafting the Standards and Guidelines for Quality Assurance in EHEA (ESGs). Since then, ESU has taken an increasingly active role, for example through co-chairing various working groups: Working Group on the Social Dimension and Lifelong Learning (2012-2015), Working Group on Policy Development for the new EHEA goals (2015-2018), Social Dimension Advisory Group (2018-2020), Working Group on Social Dimension (2021-2024) and Drafting Committee of the Tirana Communique (2023-2024).

This has created a strong sense of ownership from students, which also translated into an efficient chain of communication with national unions of students, which contributed to EHEA development through ESU and advocated for its implementation at the national level.

Conversely, the student movement did not react only positively to the developments in the Bologna Process. In the first years of the Bologna Process student unions had some criticism of the content of the process (especially on views related to neoliberal tendencies/commodification of education). Since the 2010s, the focus has shifted to improper or outright lack of implementation, turning the communiques into paper tigers or bureaucratic commitments lacking political ambition. Furthermore, in many countries, unions have complained about the lack of student participation in Bologna-related matters at the national level.

II .Perception of the National Unions of Students

II.1 Prioritisation of the Bologna Process

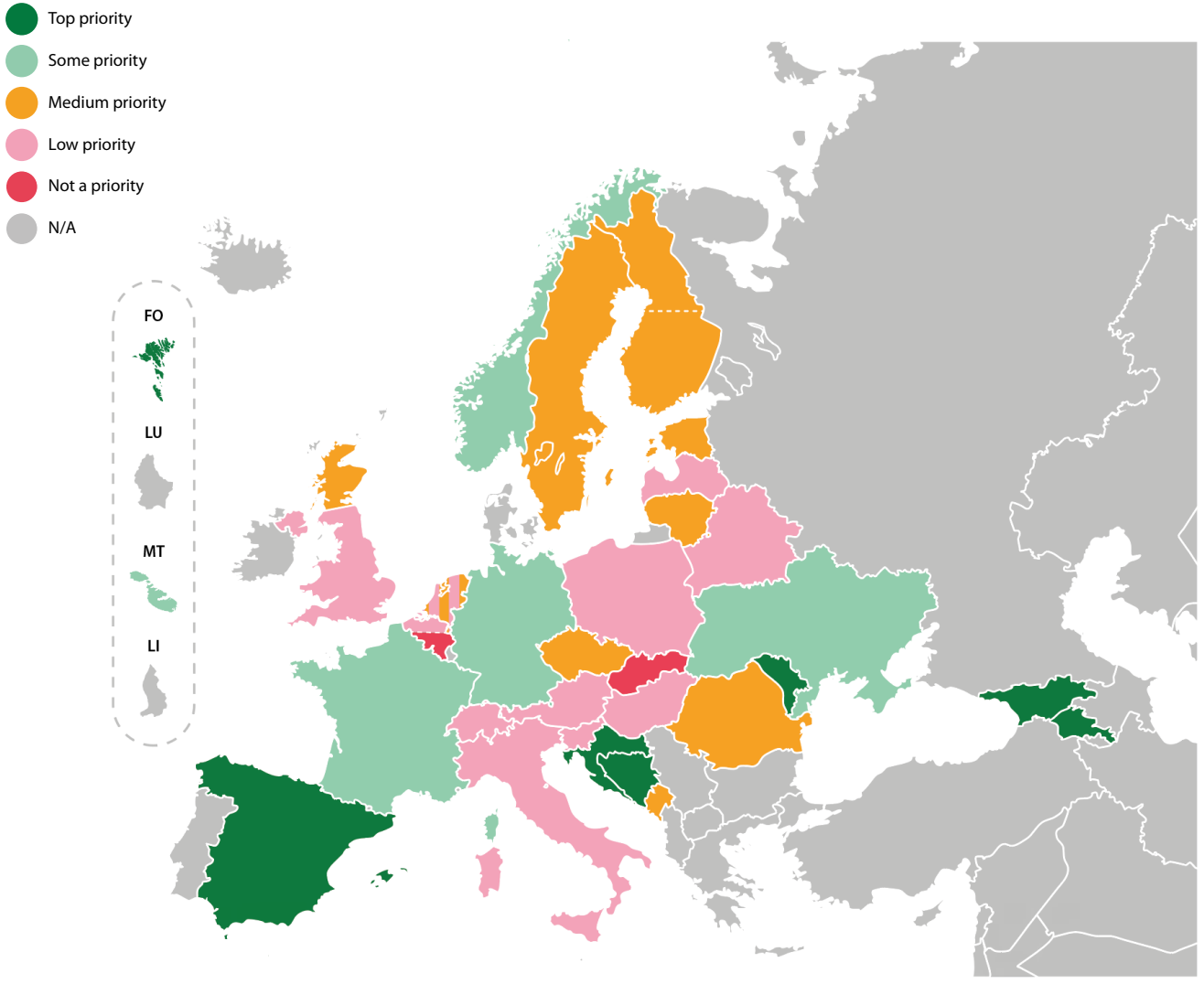
The first question that the national unions of students answered was their perception of the priority given to the Bologna Process by decision-makers and stakeholders at the national level. As a caveat, it is important to acknowledge by default that different national contexts may create different perceptions of the priority given to the Bologna Process. As such, the answers should not be used as a comparative tool between stakeholders or member states, but rather taken as an information source by the decision-makers and stakeholders included in the analysis related to how their actions are perceived by students.

This is even more the case as member states are in different stages on the trajectory of implementing Bologna Process reforms. As such, those who are more advanced in implementation can lower the topic of the Bologna Process on the agenda. While this can be understandable, it is important not to think that the Bologna Process has been entirely (and, for that matter) adequately implemented in any member state, which the following chapters clearly show is not the case Furthermore, the commitments are also constantly evolving, and as such this is a continuously developing process which requires constant commitment from all member states.

For EU member states it can appear that the Bologna Process has been deprioritised following the creation of the EU's European Education Area on the grounds that the Bologna reforms are taking too long.

As evidenced in the map below, in six countries the NUSs believe that the Bologna Process is a top priority for the ministries (Armenia, Bosnia Herzegovina, Croatia, Georgia, Moldova, Spain), out of which four are non-EU members. For an additional seven of the NUS (Bulgaria, Denmark, France, Germany, Malta, Norway, Ukraine, Bulgaria) it is considered a high priority, while only in Slovakia does the NUS believe that the Bologna Process is not a priority at all. The countries where the NUS believes that the ministry gives 'medium priority' to the Bologna Process are coloured in orange, while those unions which believe there is 'low priority' for the Bologna Process are coloured in pink.

4.1. Bologna Process as a priority for top-level authorities



Going beyond an examination of public authorities, we observe that the national unions of students believe they are the ones putting the Bologna Process at the top of their priorities the most, with 27% considering it a top priority, in comparison with 19% for ministries, 11% for higher education institutions and 9% for local students' unions. On the other hand, 57% of local students' unions consider the Bologna Process of no priority or little priority for them, compared with 27% for higher education institutions, 35% of top level authorities and 21% of NUSs. This can be attributed to little information on the side of local students' unions about the Bologna Process and how it could impact institutional policies, as well as to lack of priority in comparison with bread-and-butter student issues at institutional level. One project that aims to bridge this gap is the Bologna Hub Peer Support (BHPS), coordinated by the German Academic Exchange Service (DAAD), which aims to support higher education institution through enhancement-oriented peer reviews with Bologna experts, ensuring adequate support in the implementation of Bologna reforms.

4.2. Perceived prioritisation of the Bologna Process among stakeholders

II.2 Challenges in implementing the Bologna Process

Unions were asked to identify the main challenges in relation to the implementation of the Bologna Process in their own higher education systems. All countries reported challenges with the exception of Finland and the United Kingdom - Scotland.

The most common challenge perceived is the lack of resources from the top level authority, which is present in 17 higher education systems (AM, BiH, CH, CZ, GB, HU, IT, LT, LV, ME, MT, NL, NO, PL, SE, SK). Firstly, this shows that whilst several policy commitments can be at least partly implemented without funding, most of them can not, or certainly not at a sustainable level. Despite several references to adequate funding for higher education in ministerial communiques, the overarching issue is the fact that eventually the decision-making power on allocating public funds rests outside of the ministry of education, usually at the ministry of finance or other structures within the government. In order to achieve sustainable funding, these actors need to be convinced of the socio-economic returns of investing in higher education by the whole higher education sector. Furthermore, it should be clarified that commitments in the Bologna Process, despite being taken by the higher education ministers, are bound on the governments which they represent, and as such should fund achieving the goals.

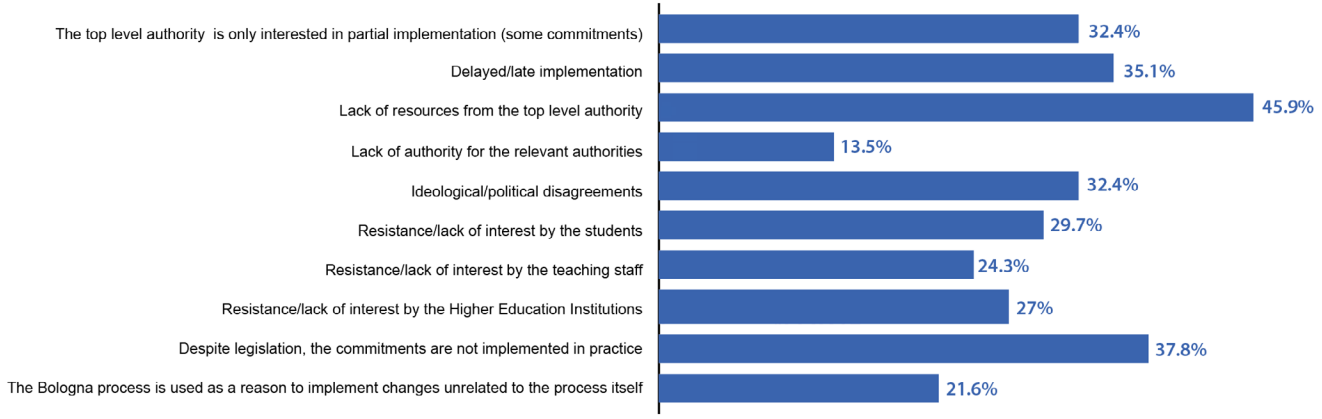
The second most significant challenge is the fact that despite commitments being in place in legislation, they are not implemented in practice. This is the case for 14 higher education systems (AM, AT, BG, DE, ES, HR, IT, LV, ME, MT, NL, PL, RO, UA). It is, nevertheless, a mediate rather than immediate challenge, as the lack of concrete implementation implies other challenges in the background as a 'primary' reason for non-implementation, for example the lack of trust/interest in Bologna reforms or disagreement with them (either at national or institutional level), lack of interest or lack of adequate information at institutional level, lack of commitment from the relevant departments in the ministry of education or other public authorities etc. Some of these are captured through other challenges reported by the national unions of students. Furthermore, this also raises doubts about the adequate legal implementation of reforms, as they allow for loopholes in implementation or only apparent implementation. This can further decrease trust among member states and

stakeholders, as the 'reported' achievement of Bologna reforms is not commensurate with the actual situation on the ground, and this can explain barriers in transnational cooperation or hesitation in the implementation of measures that require prior implementation of the Bologna key commitments, such as automatic recognition.

12 unions (from BiH, BY, DE, FR, IT, LV, NL, NO, PL, RO, SE, UA) consider as a challenge the fact that the top-level authority (usually the national ministry of education) is interested only in some, but not all of the commitments agreed within the framework of the Bologna Process. This risks the coherence of the system, as the Bologna Process commitments rest upon each other and are interconnected. As such, failing to implement some of the commitments can hinder the achievement of the objectives of the Process as a whole. Furthermore, it can foster a belief that the EHEA commitments are a 'menu' where despite politically binding commitments, each member then decides which they actually want to implement.

In eight cases (AM, AT, BiH, DE, FO, FR, HU, ME), unions reported that the Bologna process is used as a reason to implement changes unrelated to the process itself. This can also undermine trust in the Bologna Process, in the context of promoting unpopular reforms in the name of implementing the Bologna Process, without the commitments in the Bologna Process requiring such policy initiatives or the policy initiatives actually going contrary to the principles of the Bologna Process. This can stem either from the advantage of 'putting the blame' on an external factor or from a lack of adequate knowledge. In the past, one common example was the inadequate implementation of the three-degree cycle structure, but recently more common examples are linked to the implementation of student-centred learning. Whilst the next challenges regard the lack of political support coming from various parts of the community, the last challenge, accounting for five answers, refers to the lack of authority (or competence) of the top-level authority. This is especially relevant in cases where ministers of higher education agree on reforms in the Bologna Process, but they in turn require approval from state-level authorities (in federal systems) or financial support (from the ministry of finance). For the cooperation with such authorities, see also the chapter on social dimension.

4.3. Main challenges in implementing reforms related to the Bologna process



II.3 EHEA and EU's European Education Area

After 2017, and with more ambition during the current legislature of the European Union (2019-2024), a new area of education emerged in the agreement of the European Union countries to establish a European Education Area (EEA). The EEA covers all education levels, and is embedded in the political and policy processes of the EU, with various interlinkages with funding programmes or other EU initiatives. It is important to note that in the meanwhile, all EU member states, as well as the European Commission itself, are also part of the Bologna Process.

ESU has highlighted in recent years, especially in our Vision for European Higher Education Policies (ESU, 2022), that the Bologna Process should remain the main fora for advancing in higher education reforms at a European level, considering its broad membership, the already existing corpus of commitments and tools, and the established formal engagement of stakeholders has been acknowledged from the outset. In comparison with other education levels, where there is no similar cooperation as in EHEA, in higher education the EEA can serve as a deepening mechanism

for policy commitments in the EHEA, without a diverging direction.

For this to be maintained, the EEA needs to continue being embedded in the Bologna Process and support its implementation. On the one hand, this is already done through the funding support by the EU (available also to EHEA non-EU countries) for the Bologna policy reforms, as well as through promoting the implementation of the Bologna Process in the main narrative of the EEA. On the other hand, the legitimate unease with the slowness of the Bologna Process can create unwanted consequences, where the EHEA is faced with a fait accompli by existing policy commitments created in the EEA before they are agreed in the EHEA. This has been the case for the common approach to microcredentials, which can act as a disincentive for non-EU member states to implement policy tools they have not hitherto been engaged with.

In order to assess the extent to which the EEA and the EHEA are discussed and dealt with in a synergy at a national level, avoiding disparate or diverging implementation efforts, we asked the unions how these two policy arenas interplay. Out of the 23 countries of the European Union where we have information, 39% answered that the establishment of the EEA was discussed in correlation with the developments in the EHEA, 26% answered that the establishment of the EEA was discussed by the policy-makers, but independently from the EHEA, and 17% declared that the establishment of the EEA was not discussed in their country. Finally, 17% did not provide an answer. This shows that more national intercorrelation between the EHEA and the EEA discussions are required, in order to avoid duplication of efforts or incoherence.

III.4 Cooperating on the implementation of the Bologna Process

The spirit of the Bologna Process has rested on the strong engagement of all higher education community representatives in its design, decision-making and implementation, as such incentivising reforms in a framework where institutional autonomy implies a great emphasis on bottom-up agency. Furthermore, stakeholder organisations have been proven to be knowledgeable experts in implementing Bologna reforms, as well as actors advocating for its development.

In recent years, however, the decrease of enthusiasm linked to moving the Bologna Process forward has also been replicated by a lower engagement of stakeholders. This refers not only to the implementation process, but also to the national consultation of stakeholders on topical discussions in the Bologna process structures themselves. Based on an open survey, the Task Force on Enhancing Knowledge Sharing in the EHEA elaborated a document outlining the Stakeholders' Perception of the Bologna Process (EHEA, 2023), where only slightly above 20% of participating student unions said they feel adequately consulted in the Bologna Process, while less than 20% of students affirmed so. On another hand, close to 40% felt adequately informed about the Bologna Process.

In this sense, it is clear that the efforts of enhancing knowledge-sharing and better engaging stakeholders in the national work related to the Bologna Process must be increased. In this sense, an important step would be the implementation of the Recommendations for BFUG members to enhance knowledge sharing within the EHEA community (EHEA, 2023) created by the dedicated BFUG Task Force. One example is related to creating expert networks, which have been more present in the past and proved to be an extremely useful tool for sharing knowledge about the Bologna Process and incentivising implementation through peer-support.

On a positive note, in the previous cycle we have seen an increase of national unions of students being nominated to Bologna working groups by their member states. This is particularly the case for the Working Group on Social Dimension, where Austria, Denmark, Germany and Romania are represented by the national unions of students, whilst Germany and the United Kingdom have also delegated representation on the Working Group on Learning and Teaching to their national union

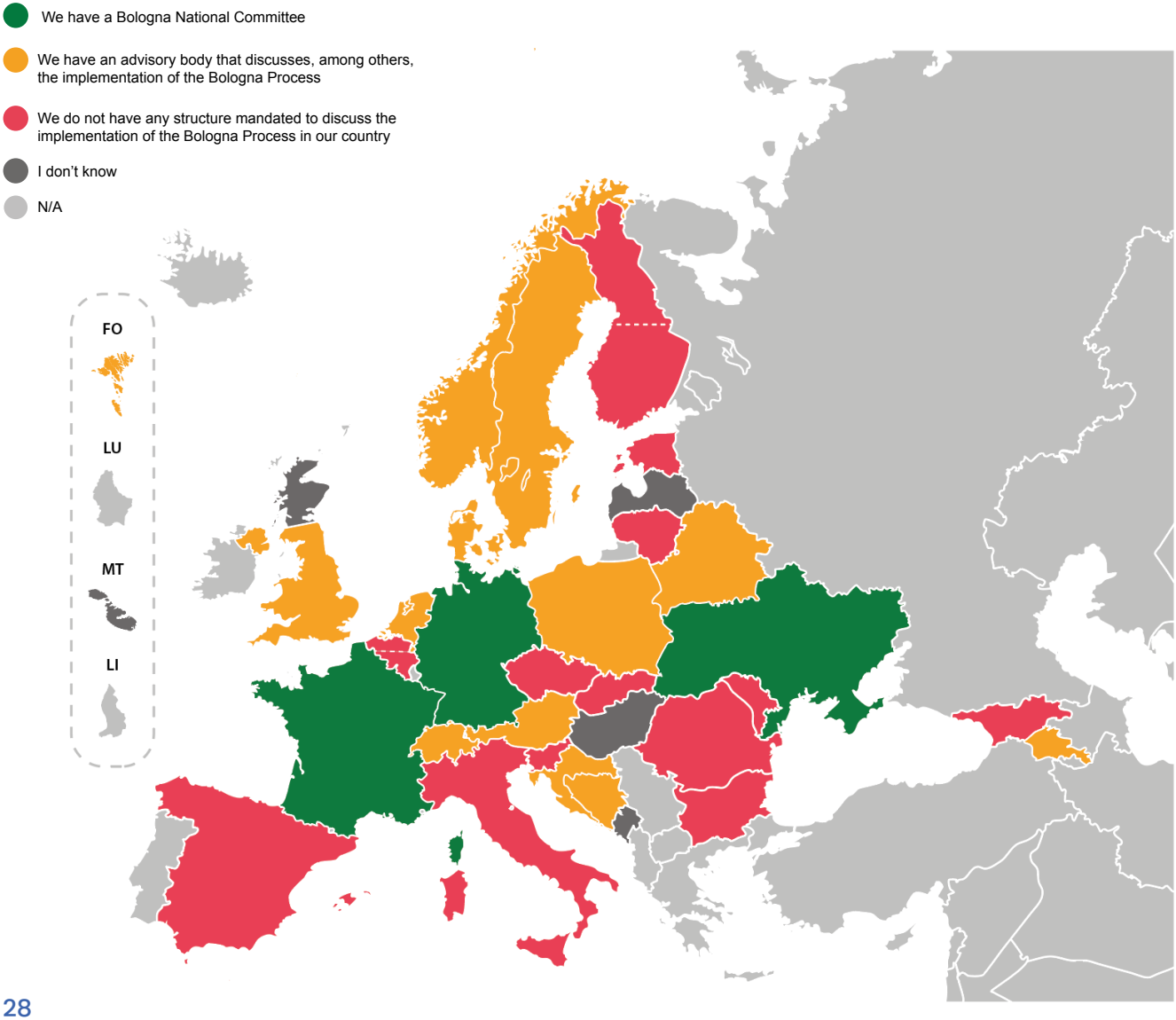
of students.
A central point to the endeavour of working together on the implementation of the Bologna Process at the national level is the creation of 'national BFUGs', which bring together the country representatives in the BFUG working structures, as well as national stakeholders. This practice is present in countries such as France and Germany. The national BFUG should both be consulted on discussions taking place in the Bologna Process and be informed of the decisions taken.

In some cases, there are advisory bodies that also have a remit related to discussing Bologna Process affairs, despite not being dedicated to the Bologna Process. This is the case in Austria, Bosnia and Herzegovina, Croatia, Denmark, the United Kingdom, Norway, Poland and Sweden. Unions report that such a body is informed and/or consulted on BFUG work in Armenia, Austria, Denmark, Norway, Romania, Sweden and Switzerland.

In order to better plan the implementation of the commitments taken in the Bologna Process, some countries include their operationalisation in dedicated strategies. Unions report this is the case for Armenia, Switzerland, Faroe Islands, Poland and Sweden. In the past, such kind of operationalisation plans were also recommended for the Widening Participation for Equity and Growth - A Strategy for the Development of the Social Dimension and Lifelong Learning in the European Higher Education Area to 2020 (EHEA, 2015), with very few countries following suit. In the current cycle, concrete operationalisation plans are only required for the countries interested in participation in the thematic peer groups under the Bologna Implementation Coordination Group (qualification frameworks and ECTS, recognition, quality assurance).

Finally, one way to gauge student perspective is also as a part of the country's contribution to the Bologna Process Implementation Report organised by Eurydice. For the 2020 edition, 41% of national unions have confirmed they were consulted by their country.

4.4. Existence of a national structure that works on the implementation of the Bologna Process



IV.4 Bologna Process going further: overarching views on the next steps

In 2020, the ministers of higher education decided that the three overarching priorities for the Bologna Process until 2030 were an inclusive, innovative and interconnected EHEA. In order to achieve this, they adopted the Principles and Guidelines to Strengthen the Social Dimension of Higher Education in the EHEA (EHEA, 2020) and the Recommendations to National Authorities for the Enhancement of Higher Education Learning and Teaching in the EHEA (EHEA, 2020). These two documents can be considered as tools to assess the extent to which EHEA becomes more inclusive and innovative by 2030. For an interconnected EHEA, no such guideline or roadmap was given, except references in the Communique to various commitments (automatic recognition or internationalisation-at-home), despite the longstanding benchmark of 20% mobile graduates. .

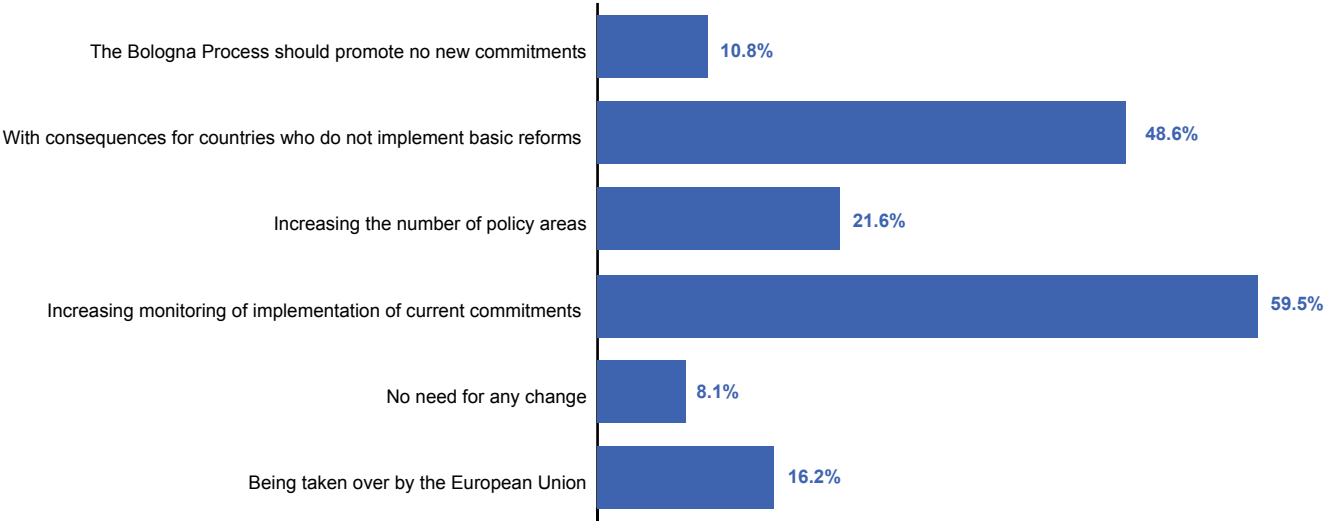
Most of the national unions of students (59.5%) would expect a stronger monitoring of the implementation of the Bologna commitments. This would require not only more in-depth analysis of the de jure and de facto implementation of Bologna, that would also allow wider comparison between the implementation cycles, but greater emphasis on operationalisation of (high-level) political commitments through more concrete indicators. However, the risk of agreeing such indicators in the BFUG is a race to the bottom where those already implemented by most countries or easiest to implement are being agreed upon, despite not fully encapsulating the commitment taken by ministers. Nevertheless, it is clear that unions consider monitoring to be a strong incentive for member states to follow-up on their commitments, as well as a basis for new developments.

Consequently, 48.6% of unions believe that stronger monitoring should be coupled with consequences for countries who do not implement basic reforms, highlighting the importance of both accountability and the public responsibility for higher education. Previous discussions with the unions showed that there is little support for excluding countries if they do not implement Bologna commitments, unless such infringements are against fundamental values in higher education. The rationale for this is that the measure would, in the end, affect more the students and higher education institutions than the member state concerned. However, countries not implementing basic Bologna reforms should be required to at least devise and publish action plans and report on their implementation separately to the BFUG and the ministerial conference.

21.6% of unions believe that the Bologna Process should increase the number of policy areas that it tackles. On the contrary, the preference of unions is deepening existing cooperation in policy areas under the current portfolio of EHEA, rather than taking up new topics. This is also consistent with the belief that there is more to be done to achieve the goals in topics such as social dimension, student participation, and learning and teaching policies (for example on student-centred learning). In counterbalance, 10.8% of unions believe that the Bologna Process should promote no new commitments, even in the areas already tackled by the EHEA, and should focus exclusively on implementation and peer-learning.

16.2% of the unions believe that the EHEA should be taken over by the European Union. Interestingly enough, none of the unions expressing such a preference are from countries that are part of the European Union. In the end, the least amount of unions, 8.1%, believe there is no need for any change in the future of EHEA.

4.5. Vision for the future of the Bologna Process



Some of the ESU proposals for future commitments in the current policy areas include:

- Creating a student-centred learning framework/guide, that would support EHEA member states in upholding student-centred learning while navigating current developments and reforms;
- Creating an action plan on promoting mobility, including related to targets, definitions and a roadmap to more inclusive and balanced mobility in EHEA
- Continuing the work on fundamental values through the technical monitoring framework
- Continuing the work on social dimension through supporting data collection, impact assessment and the link between social dimension and other topics (lifelong learning, community engagement, quality assurance, funding)

V. Recommendations

- Maintain EHEA as the main fora for decision-making and European policy development in higher education in Europe
- Increase political ambitions to international cooperation in higher education through the Bologna Process and, as such, revitalise its impetus.
- Determine the space of EHEA in the future of HE in Europe by determining a long-term vision beyond 2030, as well as contribution in relation to other international fora
- Discuss EHEA and EEA developments together at national level and ensure the synergy between them
- Communicate with stakeholders the importance of the Bologna Process
- Create national BFUGs, gathering the national representatives in BFUG working structures and national stakeholders, and use the to consult and inform stakeholders on BFUG decisions, as well as engage them in implementation
- Integrate in national strategies concrete points related to the implementation of Bologna commitments, with allocated responsibilities for ministries, public agencies, stakeholders etc and offer adequate resources in this regard
- Nominate stakeholders, including students in Bologna working structures alongside ministry representatives
- Create or support Bologna national expert networks

- Ensure stronger monitoring of Bologna acquis, including through more in-depth views and established indicators
- Promote stronger accountability of member states not implementing Bologna reforms, including through special planning and reporting mechanisms
- Deepen commitments in existing policy areas rather than looking at new ones
- Integrate in BFUG work new trends transversally, including AI and sustainability

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Student participation

I. Introduction

The European student movement is a key stakeholder of the European higher education landscape, it has a long history that is deeply intertwined with such fundamental ideals as student rights, democratic principles, active citizenship, the pursuit of societal transformation, social equity, international solidarity, and crucially, educational reform. Students champion these principles through both activism and advocacy, organising themselves through self-representative structures within and beyond the realms of higher education institutions. The bedrock of the European student movement lies in the pivotal concept of student engagement within higher education. Historically, the progressive recognition of students within the Bologna Process unfolds in three distinct stages that can be observed throughout the course of the various commitments made within the various Ministerial Communiqués and Declarations of the EHEA.

II. Bologna commitments

Phase 1: Acknowledgement of students as full members of the higher education community

While the 1999 Bologna Declaration expressed the intention to collaborate with European higher education organisations, it was only in the 2001 Prague Ministerial Communiqué that student participation was officially recognized within the Bologna Process and EHEA core values. This marked a significant milestone in the history of the Bologna Process, ministers acknowledged students as full members of the higher education community, 'stressed that the involvement [...] of students as competent, active and constructive partners in the establishment and shaping of a European Higher Education Area is needed and welcomed,' and 'affirmed that students should participate in and influence the organisation and content of education at universities and other higher education institutions (Prague Communiqué, 2001).'

Phase 2: Acknowledgement of student organisations as indispensable partners of higher education & the EHEA

Subsequently, the Communiqués from 2003 (Berlin), 2005 (Bergen) and 2007 (London) acknowledged the importance of the active participation by all partners in the Bologna process, with specific emphasis on the constructive participation of student organisations and the call for increased student involvement in higher education governance. Building on this, the 2009 Leuven/Louvain Communiqué explicitly recognised the full participation of students and staff as exemplifying European values, endorsing the organisational structures of the Bologna Process that included students as fit for purpose. Building on this foundation, the 2010 Budapest-Vienna Declaration made a clear commitment:

'We commit ourselves to working towards a more effective inclusion of higher education staff and students in the implementation and further development of the EHEA. We fully support staff and student participation in decision-making structures at European, national and institutional levels.'

Continuing this trajectory established in earlier communiqués, the 2012 Bucharest Communiqué acknowledged and appreciated the significant contributions made by students in the implementation of the Bologna reforms.

Phase 3: Acknowledgment of student participation as a fundamental value

The 2015 Yerevan Communiqué marked a significant thematic shift, highlighting for the first time a student's right to academic freedom, with ministers committing to 'support and protect students and staff in exercising their right to academic freedom and ensure their representation as full partners in the governance of autonomous higher education institutions.' Building on that, in the 2018 Paris Communiqué ministers pledged to 'promote and protect them [the fundamental values] in the entire EHEA through intensified political dialogue and cooperation.'

This commitment reached its culmination in the 2020 Rome Communiqué, in which the previous commitment was reaffirmed alongside the emphasis that '[t]he EHEA is a unique cooperation, built on trust, where public authorities and higher education stakeholders work together to define and achieve shared goals.'

This journey represents the remarkable evolution of student representative participation from acknowledgment to partnership to recognition as a fundamental value across the EHEA. Following this, the subsequent analysis will explore the extent to which the Bologna commitments are translated into tangible actions and whether they are genuinely realised on the national and local levels of higher education or simply remain as empty rhetoric, viewed through the lens of the national unions of students of Europe.

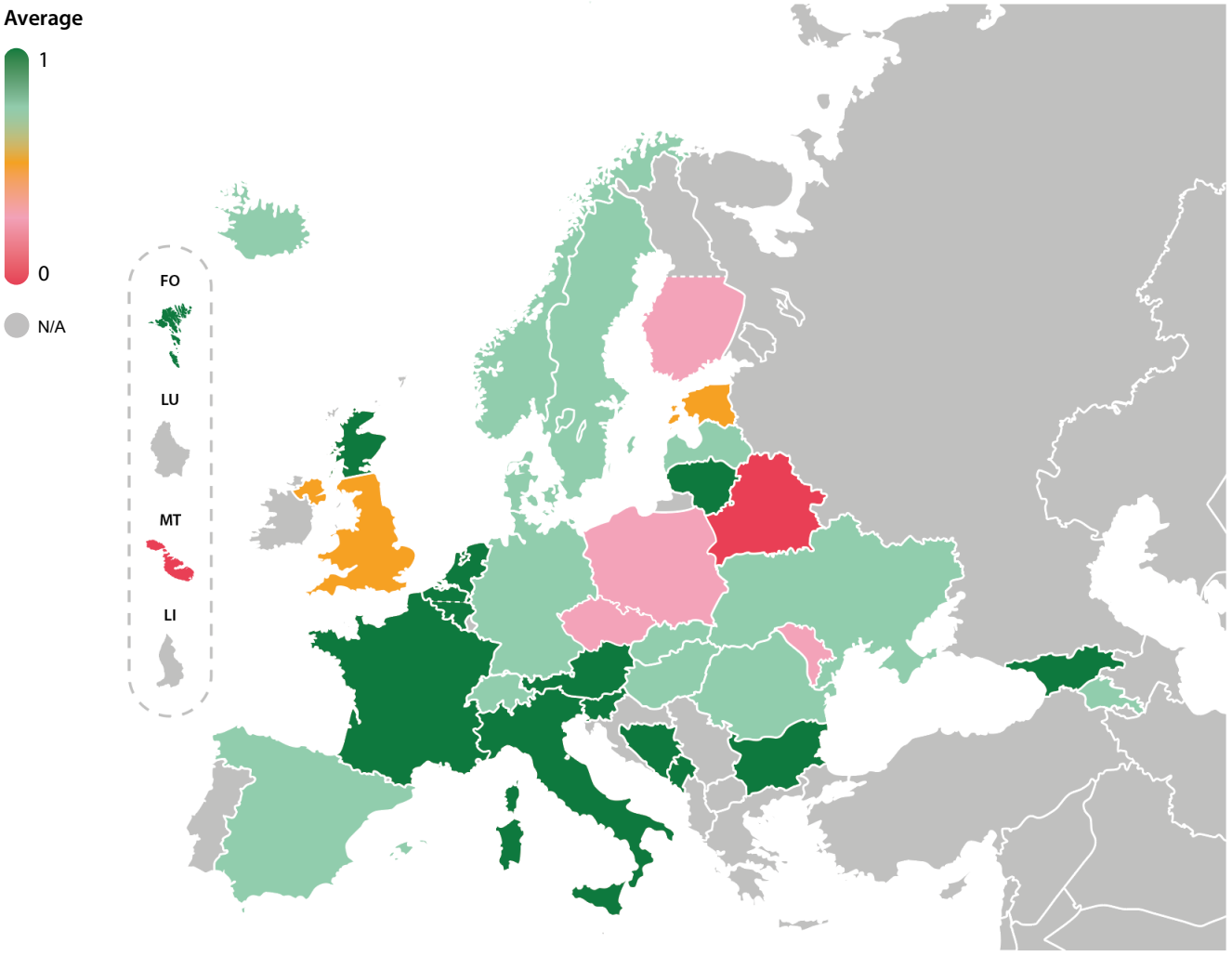
III. Analysis of Bologna commitments implementation

Legal implementation of student participation

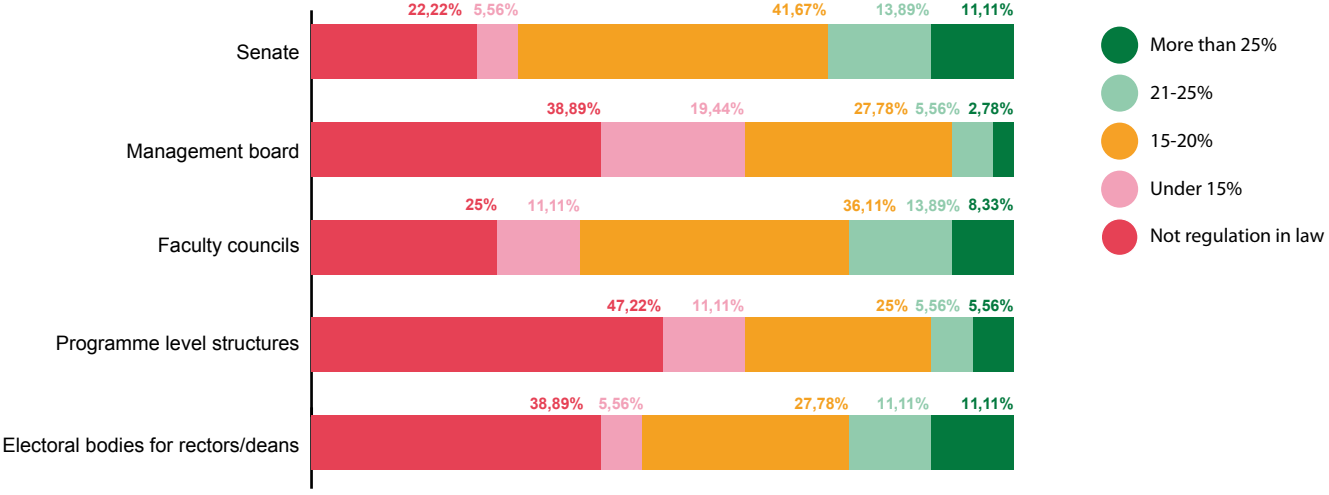
As ministers have repeatedly confirmed commitment to ensuring student representation, it lies within their responsibility to implement regulations and processes in which the minimum requirements for student participation at different levels within higher education governance is ensured.

With regard to the highest top decision-making levels (public authorities), only 50% of the NUSes reported the existence of such legal requirements.

5.1. Existence of legislation/regulations ensuring a minimum level of student participation in decision making bodies on top-level, HEI level, faculty level and programme level (average score)



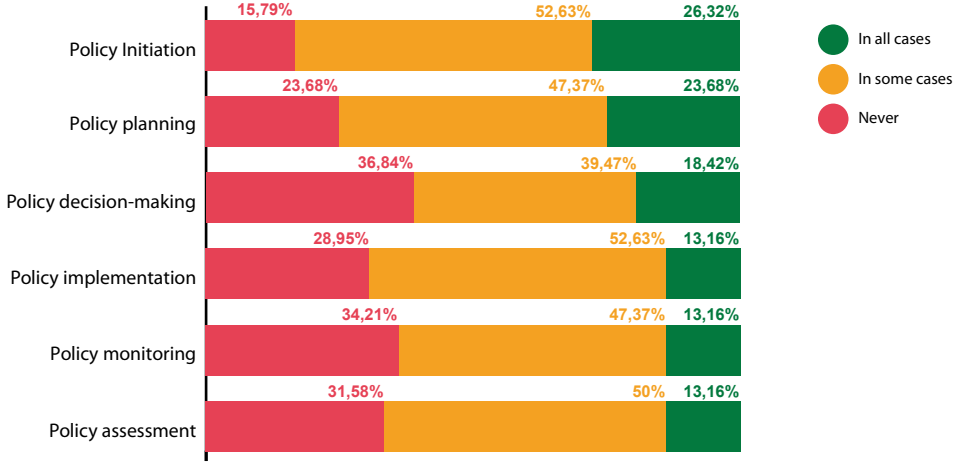
5.2. Minimum level of student participation (in case of the existence of minimum levels of student participation)



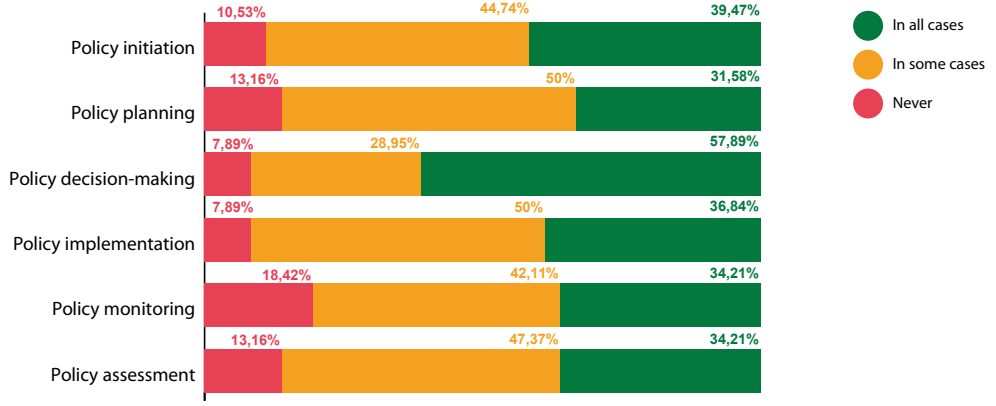
More positively, 86.8% of the NUSes reported that there are legal requirements by PAs for HEIs to include students in decision-making processes. It is most common that regulations concern participation in HEIs senates (77.78%), faculty councils (75%), HEI management boards (61,11%) and the election committees for rectors/deans (61,11%). In Switzerland and Germany it depends on the approach taken by the canton/federal state whether such regulations exist and for what purpose.

Involvement of students throughout different phases of a policy cycle

5.3. Involvement of student representative throughout different stages of the policy cycle at top level



5.4. Involvement of student representative throughout different stages of the policy cycle at HEI level

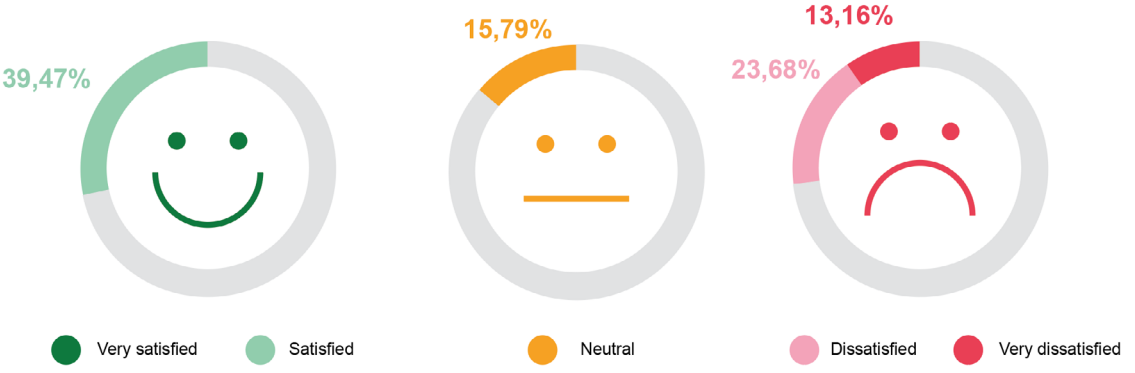


Moreover, it was inquired in which phases of a policy cycle (initiation, planning, decision-making, implementation, monitoring, assessment) student representatives were most commonly involved. As ministers commit to broad social dialogue and stakeholder engagement. With regard to policies on top-levels (public authorities), student representatives are most likely to be involved during policy initiation (84.21%) and planning (76.32%) phases, though only 25% of NUSes report that this relates to all policies concerning higher education. Regarding policy processes on HEI level, engagement of student representatives overall is way higher than on top-level (public authorities). The engagement during decision-making processes (57.89%) in all cases is the phase where student representatives are most likely to be involved at. At the same time almost 20% of NUSes report that student representatives are never involved in monitoring processes and a further 13.16% report a lack of engagement in planning and assessment processes.

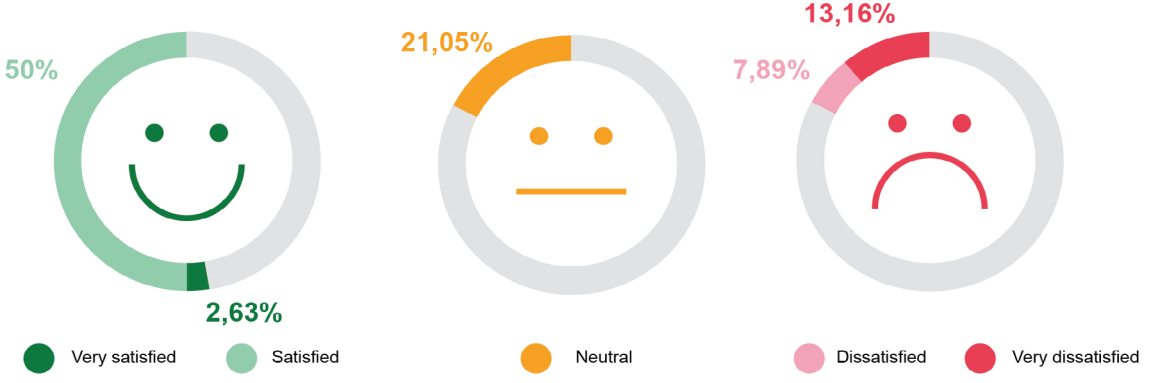
This survey sought to understand which phases of the policy cycle, initiation, planning, decision-making, implementation, monitoring, assessment, saw the highest level of engagement from student representatives, especially since ministers have committed to a broad social dialogue and stakeholder engagement. Regarding the highest level policies (public authorities), student representatives are most likely to be involved during the policy initiation (84.21%) and planning (76.32%) phases, though only 25% of NUSes report that this relates to all policies concerning higher education. Regarding policy processes at a HEI level, the engagement of student representatives overall is significantly higher than at the public authority level. 57.89% NUSes report that student representatives are most Likely to be involved during the decision making processes. Having said that, almost 20% of NUSes report that student representatives are never involved in any monitoring processes and a further 13.16% report a lack of engagement in planning and assessment processes.

Satisfaction of NUSes with the quality student participation

5.5. Satisfaction with the degree of student participation in decision making processes at top level

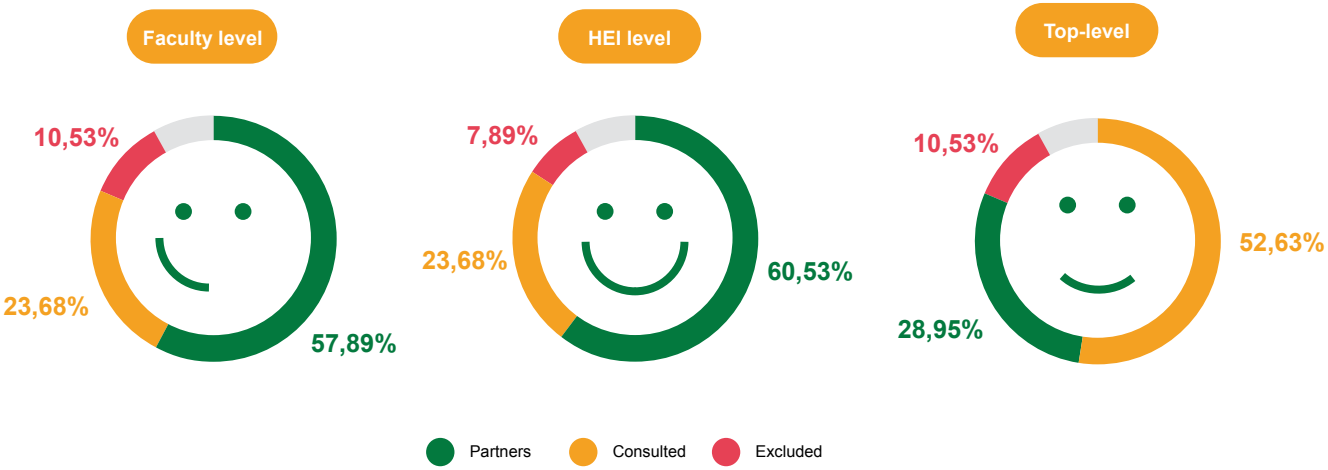


5.6. Satisfaction with the degree of student participation in decision making processes at HEI level



When asked about the quality of the existing avenues for student participation in higher education governance, 36.85% of NUSes expressed dissatisfaction but at the same time 39.47% of NUSes satisfaction regarding their engagement in top-level national policy making. Regarding HEIs, satisfaction levels are higher, with 52.63% of NUSes expressing satisfaction and only 21.05% of NUSes being dissatisfied.

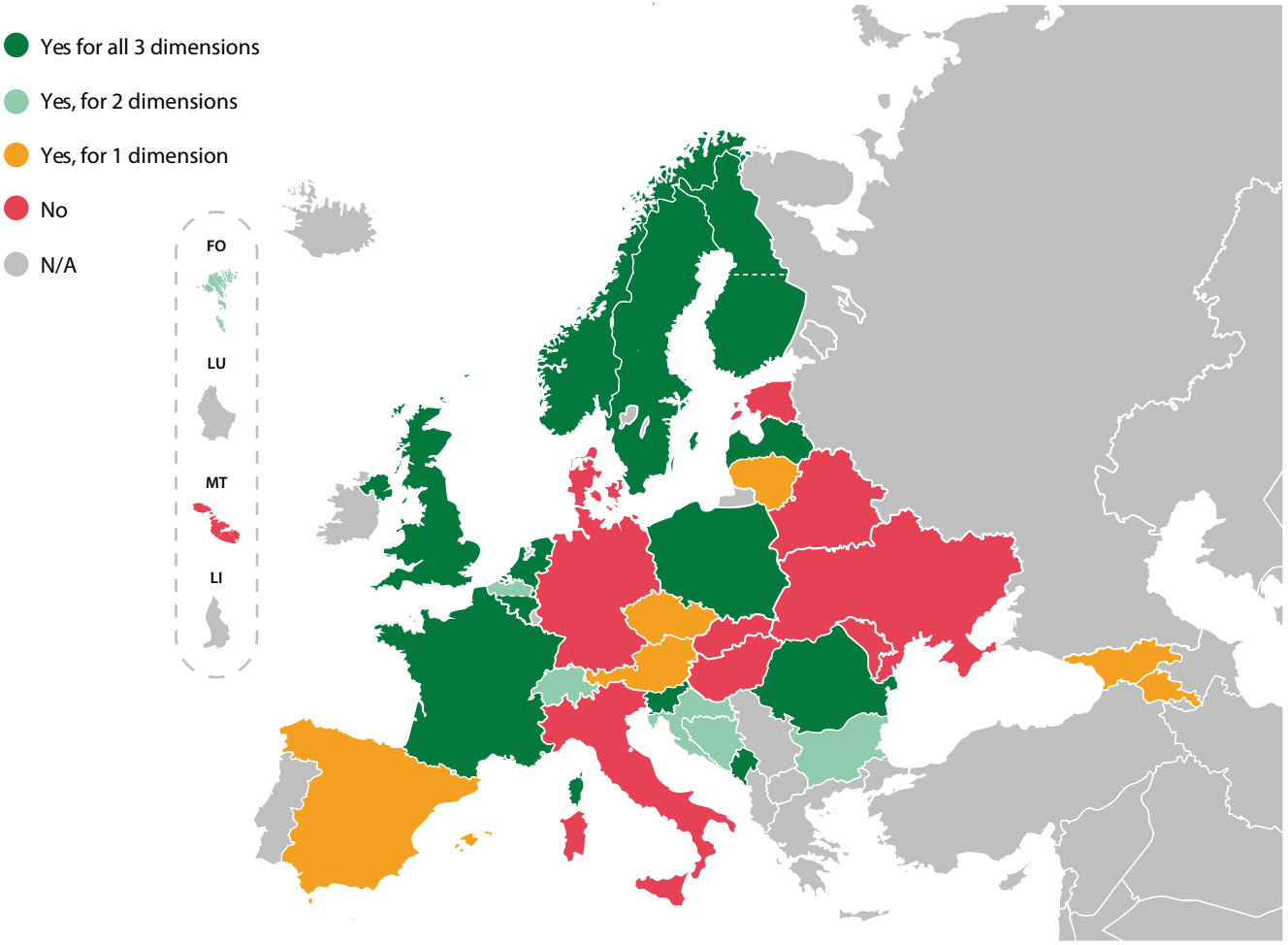
5.7. Role of student unions on faculty, HEI and top level



There are also differences in the way in which student representatives are treated at an HEI level when compared with other stakeholders. 60% of NUSes reported that student representatives are usually treated on equal terms or even prioritised in relation other stakeholders whereas the assessment with regard to public authorities is significantly lower, reaching only 28.95%.

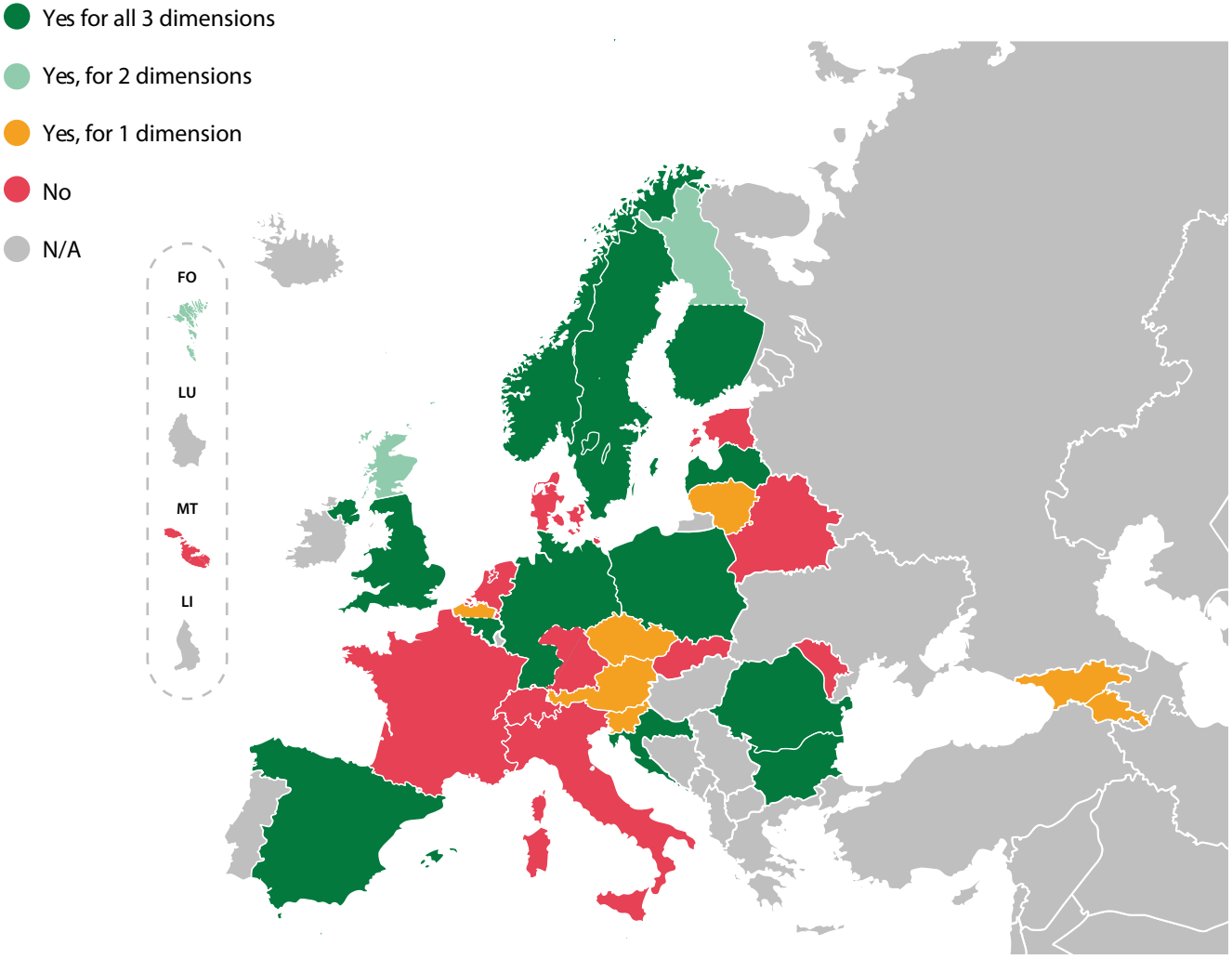
Protection and promotion of student unions/representative structures and student participation

5.8. Existence of measure that guarantee the political, financial and institutional independence of student unions at top level



Whilst student participation may be legally recognised or just common practice at different levels of governance, this does not necessarily mean that the existence of students' unions (understood broadly as collectivised and democratically elected student representative structures) is guaranteed and if they do then to what extent they are recognised as legitimate student representatives. To this end, ESU asked whether measures were in place that guaranteed the independence of students' unions at a national and HEI level. Regarding national levels, 25% of NUSes report that there are no measures in place to promote their institutional, political or financial independence, and of those who responded, that measures are in place, only half reported that they encompass political, institutional and financial independence. Measures that scored highly were political independence (88.46%) and institutional independence (84.62%) whereas financial independence was only guaranteed in 57.69% of cases.

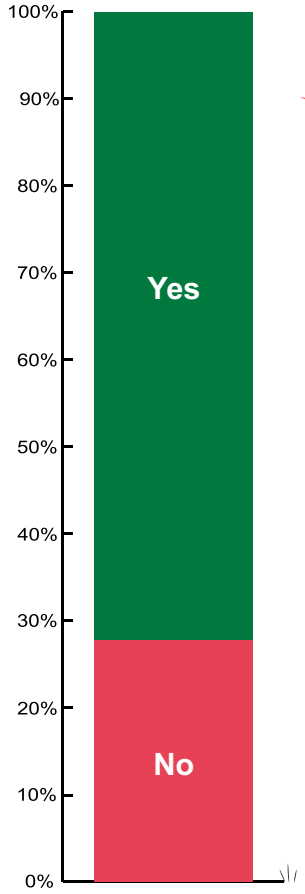
5.9. Existence of measure that guarantee the political, financial and institutional independence of student unions at HEI level



At the HEI level the situation is only slightly better, with 19.44% of NUSes reporting that there are no measures in place regarding the independence of students' unions. Where measures are in place, financial independence (84.62%) and institutional independence (80.77%) are the most common, whilst only 53.85% reported that measures on political independence were in place. Only about half of the NUSes reported that measures encompassing all three dimensions are in place.

These figures become even more worrying given the trend of recent years of attempts to undermine students' unions. In Italy Prime Minister Meloni attacked the national union on TV (European Students' Union, 2023) , in Slovenia the autonomous status of unions is threatened (European Students' Union, 2023), the Swedish government intends to decrease the funding for student organisations (European Students' Union, 2023) and the former French Minister of Education accused a union of islamo-leftism to justify a racist law aimed at silencing them (ESU, 2021), amongst others. Furthermore, the EU Recovery and Resilience Facility was falsely used to justify higher education law reforms in Slovakia, Croatia (European Students' Union, 2022), Spain (European Students' Union, 2022).

5.10. Institutional obstacles to student participation



Lack of support to avoid negative impact on the study progress

Lack of financial remuneration

Lack of non-financial remuneration

Fear of repercussions for participating in certain interest groups

Cultural / language barriers

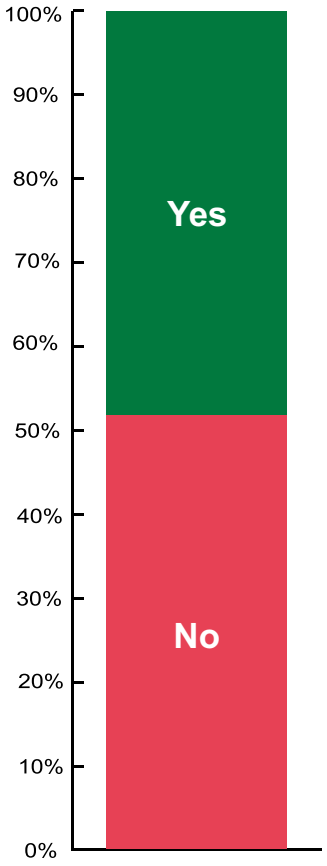
Lack of time

Unwelcoming environment

When asked about other institutional obstacles to student participation, 68.42% of NUSes reported that various barriers persisted in their country. The most common ones were a lack of time (92.31%), the negative impact on study progress due to engagement (80.77%) and the lack of financial remuneration (76.92%). The latter two are further exacerbated by the need for employment in addition to full-time studies and consequences if those studies don't progress in a timely fashion (e.g. regarding study grants and tuition fees). Moreover, It is alarming that 57.69% of those NUSes that reported obstacles (i.e. a total of 47.67% of all surveyed NUSes) reported a fear of repercussions amongst students for their involvement in student representation and this further inhibits effective student participation.

Some students' unions elaborated further, pointing to a lack of democratisation with students having little real power, not being involved in the relevant bodies (i.e. rectorates), and being excluded from informal meetings where decisions were being taken. In Ukraine the consequences of the war (e.g. destroyed facilities, blackouts, distance learning, psychological and emotional stress) hinder student participation.

5.11. Other structural issues threatening the independence of student unions



Financial independence

Institutional independence

Political independence

Lastly, 38.89% of NUSes answered that there were other structural issues that could threaten the independence of student unions, other than those covered by the previous questions. Of those NUSes, 78.57% pointed towards threats to the financial independence of students' unions. The Danish NUS highlighted a lack of regulation around the funding of political parties' and running bodies that resemble student unions. The Faroese NUS explained that local unions are funded through public authorities, which makes them nervous about losing financial support if they, or their member unions, take a contrary political position. Regarding political and institutional independence, the Wallonian NUS reported that the current government has attacked their legitimacy, wanting to change the current law in order to create a new national student union which would be politically closer to the current government. In Bavaria independent students' unions were abolished in the 70s, and as a result student representation is institutionally and financially dependent on the HEIs. In Belarus the authoritarian regime limits academic freedom and autonomy, which generally undermines the work of students' unions, which was highlighted in the extensive 2023 report of the exiled national students' union BSA (European Students' Union, 2024). This form of systematic persecution also persists in Turkey (European Students' Union, 2021) and Russia. Lastly, as the regulation of students' unions was just changed in the UK, the effects are as yet unclear, though NUS UK is concerned regarding the potential negative impact.

IV. Key takeaways and policy recommendations

Student involvement in higher education governance is crucial, as it is firstly in line with democratic principles of higher education governance; secondly, students are the primary beneficiaries of education and have first-hand knowledge about the effectiveness of institutional practices and policies; thirdly, the involvement fosters understanding and support for decisions; and fourthly, participation allows students to practise active citizenship (Klemenčič, 2022). Over the course of two decades within the Bologna process, ministers have consistently pledged to actively involve students at European, national, and institutional levels. The 2020 publication of Bologna With Student Eyes stated that '(…) Student Participation in the EHEA is not as exciting as it should be.' Two years later little has changed.

There remains a notable absence of a parallel standard for decision-making processes at the top level. Additionally, student participation tends to be confined to consultation during the policy initiation and planning phases, with limited involvement in the decision-making, implementation, monitoring, and assessment stages of policies. These findings are also mirrored in the satisfaction levels of the national student unions regarding the way in which students are treated and included in higher education governance. Students' unions feel marginalised due to their lack of recognition as partners in co-creating and collaboratively governing higher education.
In terms of safeguarding and promoting student representative structures, measures promoting independence and rights are more prevalent at the HEI level when compared with top-level authorities. Persistent structural challenges, such as time constraints and financial limitations, continue to impede student participation across many countries. The alarming prevalence of unions reporting fears of and actual repercussions for engaging in student representative functions mirrors the global trend toward increasing illiberalism and '[t]he trend in institutional governance in Europe is clearly seen as weakening formal student participation (…) (Klemenčič, 2012).' Furthermore, concerns about financial independence are widespread among unions, emphasising the crucial need to ensure equal guarantees of financial, institutional, and political independence for students' unions to effectively fulfil their tasks within the higher education setting but also within the broader context of democratic societies.

As highlighted in the previous 2020 edition of Bologna With Student Eyes there is a need to '(…) protect democracy at its basis, by empowering student participation and ensuring that the student voice is independent and autonomous at every level.' If it shall be ensured that students become active citizens and thereby strengthen democratic culture, they need to be empowered within the higher education setting to become co-creators and determinators of the very environment they live in. Or in other words, higher education systems on all levels need to start practising what they preach. To this end, public authorities and higher education institutions should reinforce and learn from practices already established elsewhere and implement them systematically.

In order to strengthen the fundamental value of student participation and therefore active citizenship within higher education systems, the following recommendations are to be made:

1. Strengthening legal frameworks for student representation and participation, encompassing all levels of higher education governance (national, regional, HEI level and relevant HEI bodies), ensuring that students are equal partners in all relevant formal and non-formal decision making processes and guiding clearly the rights and duties of student representatives as well as their access to the information needed to fulfil their roles. Strengthening the role of students in private higher education institutions.
2. Increasing student involvement across all phases of the policy cycle and promoting more the active involvement of students to enhance co-creation in democratic higher education policy processes.
3. Improving the quality of student participation by fostering a culture in which students are considered as equal partners within decision-making processes. Avoiding tokenism. Inclusion of students in projects of HEIs.
4. Implementing measures, especially legally and through the provision of resources, that guarantee the financial, political and institutional independence of students' unions.
5. Removing obstacles to student participation, especially the constraints of time and finance, which in turn can have negative impacts on study progress (e.g., prolongation of study grants for active students, prolongation of tuition free education in countries where tuition fees are connected to the duration of studies, enumeration for work in governance structures, etc.). Exploring ways to engage students meaningfully.
6. Investing in capacity building to ensure and guarantee the meaningful participation of students and student representatives. Fostering knowledge and critical thinking of higher education staff.
7. Bridging the gap between de jure and de facto participation by evaluating the current situation of student participation and ensuring that students have a genuine say in determining the outcomes of decisions,
8. Avoiding situations where students only appear to have power without any substantive influence.

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Fundamental values

I. Introduction

Throughout the last twenty years, the European Higher Education Area consistently underscored the importance of different principles and values, highlighting their indispensability for higher education to being able to fulfil its various missions including not only education and research but also the fostering of democratic societies, social cohesion, active, European and active citizenship, personal development, trust among members countries and addressing pressing global issues as well as enhancing mobility, employability and competitiveness. As mentioned in the previous chapter on student participation, the European student movement has a long history of fighting for, promoting and defending the values held by students. At the latest since 2018 (Paris) with an additional boost since 2020 (Rome), it can be observed that several developments have prompted the EHEA in recent years to engage more actively in addressing questions with view to the values that underpin the Bologna process, encompassing:

- **Student participation** (see previous chapter),
- **Academic freedom**, relating to 'the freedom of academic staff and students to engage in research, teaching, learning and communication in and with society without interference nor fear of reprisal (European Higher Education Area, 2020),
- **Institutional autonomy**, referring to higher education institutional autonomy in regards to the self-administration of organisational, financial, staffing and academic affairs (Pruvot et al., 2023),
- **Responsibility of higher education**, referring to the obligations higher education institutions in terms of a public good have towards the broader society in regards to the three missions (1. Education, 2. Research/knowledge production, 3. Addressing societal and economic challenges),
- **Responsibility for higher education**, referring to the obligations public authorities and the broader public to ensure that the higher education system and institutions can fulfil their tasks by providing favourable legal, financial and other relevant environmental conditions,
- **Academic integrity,** which as a concept assigns rights and duties regarding the '[c]ompliance with ethical and professional principles, standards, practices and consistent system of values, that serves as guidance for making decisions and taking actions in education, research and scholarship (TAUGINIENĖ et al., 2018).'

While these 'fundamental values' haven't been exhaustively defined yet within the framework of the Bologna process, apart from the concept of 'academic freedom', a comprehensive consensus on the meaning of these values is expected to be reached during the forthcoming Ministerial conference in 2024 in Tirana. However, insights can be drawn from already existing Bologna documents and the subsequent commitments will be described in more detail in the next section.

II. Bologna commitments

Referring to the Magna Charta Universitatum of 1988, the value of institutional autonomy and independence of higher education institutions was first referenced in the 1999 Bologna Declaration. In addition, the 2001 Prague Communiqué introduced the values of academic freedom, public responsibility for higher education and academic integrity. It also introduced the idea of higher education as a public good, which was coined with the 2007 London Communiqué as the responsibility of higher education. Additionally, through the 2020 Rome Communiqué Ministers agreed for the first time on a common understanding of academic freedom.

Ever since its founding and exacerbated by the European economic crisis starting in 2009, the COVID-19 pandemic starting in 2019 and undemocratic developments of recent years in several European countries including the Russian war on Ukraine, the fundamental values of higher education of the European Higher Education Area have been reiterated and developed further in detail on a regular basis. To this end, various commitments have been made by ministers, including but not limited to commitments to (EHEA, n.d.):

- Safeguard and promote institutional autonomy, independence, democratic governance and accountability, including transparency policies and their monitoring
- A framework of public responsibility for higher education, committing to new and diversified funding sources and methods and the commitment to investments in higher education for the future to reach well-funded higher education

- Building the EHEA on democratic principles and equal opportunities, fostering diversity in higher education
- Enabling higher education to effectively respond to global challenges, crisis and societal needs (incl. social and economic crisis, democratic values, freedom of information, health and wellbeing, global peace, SDGs) through the diversity of HEIs missions, including the goal of social cohesion and fostering creative, innovative and critical thinking
- The partnership principle, including the right of students and staff to academic freedom and representation as full partners in the governance of autonomous HEIs; intensified political dialogue and cooperation
- The empowerment of students including through sustainable and flexible learning paths, as well as cooperation of teachers and researchers in international networks
- The promotion of European, global and active citizenship as well as intercultural understanding, equality and tolerance, civic and democratic values
- A robust culture of academic and scientific integrity, blocking all forms of academic fraud and distortion of scientific truth.

Overall, even though so far Ministers only adopted a common understanding on the concept of academic freedom, other values (namely institutional autonomy, student and staff participation, responsibility of and for higher education, academic integrity) and commitments to them have been reiterated in every Ministerial Communiqué albeit there have been different foci over time.

III. Analysis of Bologna commitments implementation

A. Academic Freedom

Academic freedom as a concept is rarely mentioned explicitly in legislation (Pruvot et al., 2023). While a majority of EU member states formally ascribe to the value of academic freedom through ratification of international agreements and have implemented at least related rights constitutionally (Beiter et al., 2016), caution is advised as the right of students to academic freedom and the freedom to learn are seldom explicitly recognised. As a result, the freedom to teach and freedom of science

are often not only better protected but additionally also put hierarchically above the rights of students, which can strongly influence jurisdiction to the detriment of students. In this publication the focus rests on student academic freedom, conceptualised through the freedom to learn, the students' rights and their role in the promotion and protection of academic freedom.

Violations towards student activism and against students' academic freedom

Even though academic freedom is in decline in Europe (Academic Freedom Index, n.d.) with experts postulating a crisis of academic freedom in Europe (Matei, 2021), 15 out of 36 NUSs answered that they are not involved in any discussion on academic freedom with public authorities, pointing towards a lack regarding the continuous promotion and protection of academic freedom in the EHEA, especially also with view to students' academic freedom (which overlaps naturally with aspects regarding the fundamental value of student and staff participation, as outlined in the previous chapter).

A worrying 14 out of 36 NUSs report that there have been incidents where students have been subject to threats or consequences due to their student activism in recent years. As responsible for these incidents NUSs reported equally often that public authorities, higher education institutions' leadership and academic and administrative staff were the aggressors. Only two unions cited other students as sources. In addition, one union named specifically far-right activists as a source for threats, though the problem also occurs in other countries (ESU, 2023a) .

On one hand, unions highlighted less-violent violations of academic freedom concerning especially the implementation of proctoring software for student surveillance during COVID-19 and beyond. It is argued that the forced use without any alternatives under the point of view that these tools are prone to algorithmic biases and resulting from that discriminate against vulnerable and underrepresented student groups, as well as infringing in many cases GDPR and privacy rights of students (ESU, 2024), constitutes infringements of academic freedom.

On the other hand, reports of more violent forms of aggressions include attacks and attempted reforms by public authorities and politicians on a structural level with view to student representation and self-governance. As an exceptionally extreme case, Belarus is to be mentioned where academic leadership and staff cooperate with authorities regularly in the persecution and imprisonment of student activists (ESU, 2024). As reported by NUSs through the survey, anecdotally, in Austria public authorities threatened international student activists with deportation, which highlights that some student groups are more vulnerable in terms of academic freedom and fundamental rights than others, which is also reflected in the chapter on international mobility as well as the principle 8 in the chapter on social dimension (e.g. in regards to the possibility to engage in international mobility programmes in terms of outgoing mobility, as well as on the flipside the accessibility of housing or employment for incoming students). In the UK and Scotland, students got suspended for occupations during protests, and similarly in the Netherlands, students faced judicial consequences for occupations of university buildings. In Ukraine, a student activist got suspended for his public stance against illegal constructions on campus. In Italy, students were beaten on campus by police called by the rector, and in another incident, names of students that organised a party in a university building were forwarded by the university to the police. In Latvia, cases of mobbing and threats from staff against students were reported to student unions, especially in cases when students complained about the quality of studies or their rights. Further examples that connect to the element of academic freedom have been showcased in the previous chapter on 'student participation'.

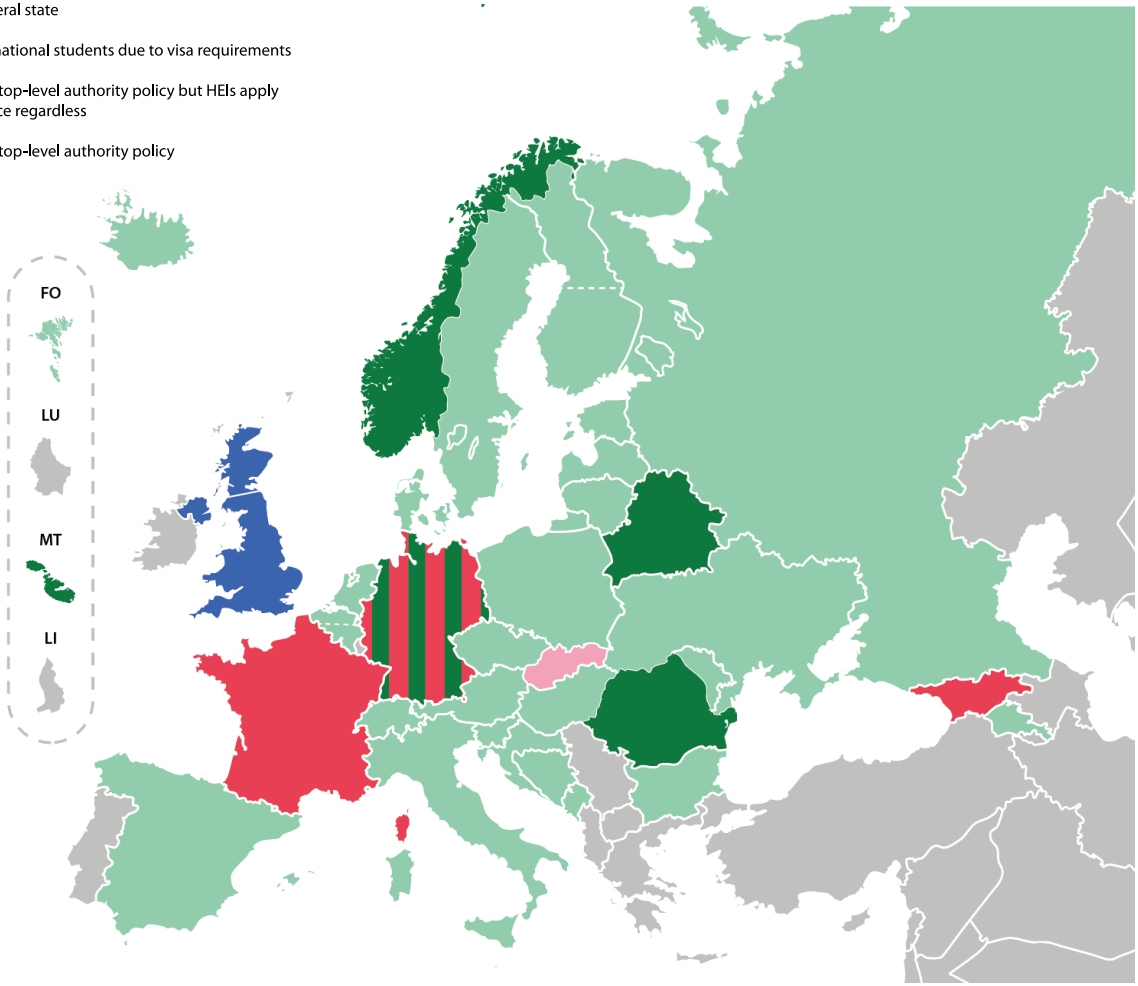
Apart from the above mentioned infringement, multiple student unions also raised the issue of gender-based violence in higher education, a widespread form of violation of student rights to academic freedom and safety in academia. For example, the Austrian student union mentioned gender discrimination as a problem in their higher education system. The German student union exemplified that a professor deducted points for using gender sensitive language in papers, while the Ukrainian student union exemplified that a rector made sexist remarks against a female student. These are a few examples of a problem that is widespread across European higher education systems as a study amongst 42.000 staff and students from 15 European countries revealed that at least two out of three female respondents have experienced gender-based violence at their higher education institution (UniSAFE, 2022).

Freedom to learn

Regarding the freedom to learn, 13 out of 36 NUSs reported that there are restrictions for students on the choice of their study programme. The most named restriction that hinders (potential) students from learning what they want to learn about regards the numerus clausus and similar restrictions such as entry exams to access certain degrees. Additionally, indirect restrictions were named such as costs for enrollment, study fees and other associated costs, unattainability of programmes due to disabilities, total number of available study places, choices during high school regarding subjects and societal pressure. Restrictions regarding the access of certain study programmes not only interfere with students freedom to learn but also mean that the free choice of profession is being limited, especially in those cases where specific study programmes are a prerequisite for a certain profession.

6.1. Existence of compulsory attendance

- Yes, it is required by top-level authority policy (e.g. law)
- Yes, top-level authorities allow HEIs to decide on compulsory attendance (incl. those countries where it lies in the autonomy of HEIs or academic staff to decide on it)
- It depends on the federal state
- Yes, but only for international students due to visa requirements
- No, it is prohibited by top-level authority policy but HEIs apply compulsory attendance regardless
- No, it is prohibited by top-level authority policy
- N/A



With regard to compulsory attendance, which arguably restricts the freedom to decide where, when and how learners want to learn (Macfarlane, 2016), only Georgia and France report that compulsory attendance is prohibited by public authorities. In addition, Slovakia reports that it is prohibited but HEIs still apply it. In Germany, it depends on the federal state, with six states prohibiting a general compulsory attendance explicitly, while in addition also several court rulings in recent years (incl. in regard to GDPR) have led to general compulsory attendance being ruled as unlawful. In the UK, compulsory attendance applies to international students due to visa requirements. Overall, students therefore are restricted in their freedom to learn when it comes to compulsory attendance in the majority of the EHEA.

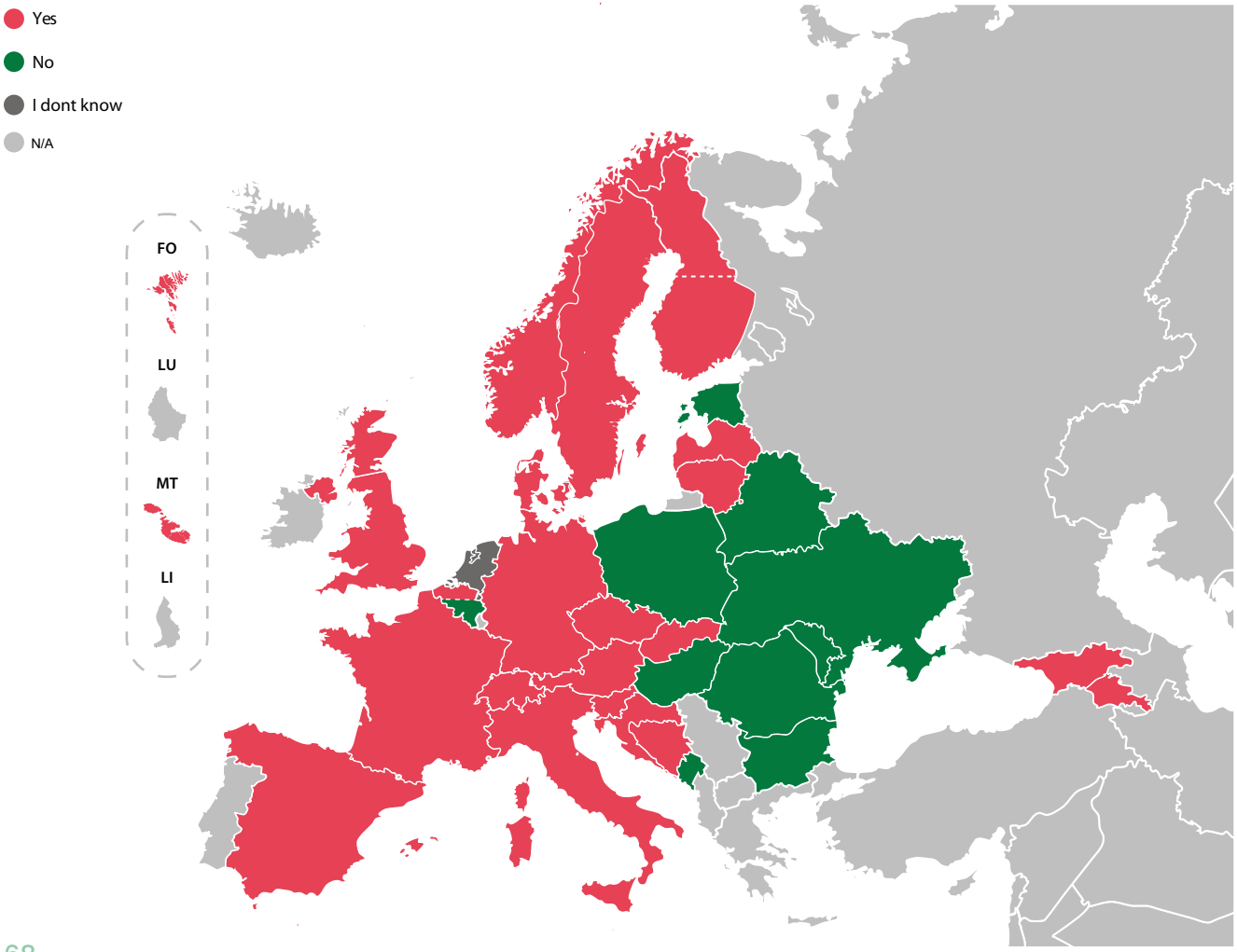
Processes of remedy

27 out of 36 unions reported that if academic freedom violations occur, they are aware of bodies or processes of remedy. Even though at first glance this seems positive, at the same time, in most countries no specific independent bodies or processes seem to exist. Rather, students can contact faculty, institutional leadership or ministries and thus are dependent on them to take action. In addition, lawsuits were often named as legal procedure for remedy, though this is connected to hurdles such as lengthy processes, need for extensive evidence and costs. A few NUSs named ethical committees, courts of appeal, ombudspersons and other similar bodies as a point of contact (Bulgaria, Hungary, Estonia, Spain, Iceland, Italy, Latvia, Montenegro, Poland, Romania, Slovakia) though their power to take action and sanctions as well as their mandates and purposes seem to vary extensively. As positive examples those stick out with seemingly more elaborated internal grievance procedures and especially those, where students are also represented within the committee structures. In Georgia, which is one of only three countries naming academic freedom explicitly in their laws, the student union is member of an authorisation and accreditation council where issues regarding academic freedom and student rights are processed.

B. Institutional Autonomy

Interferences by public authorities

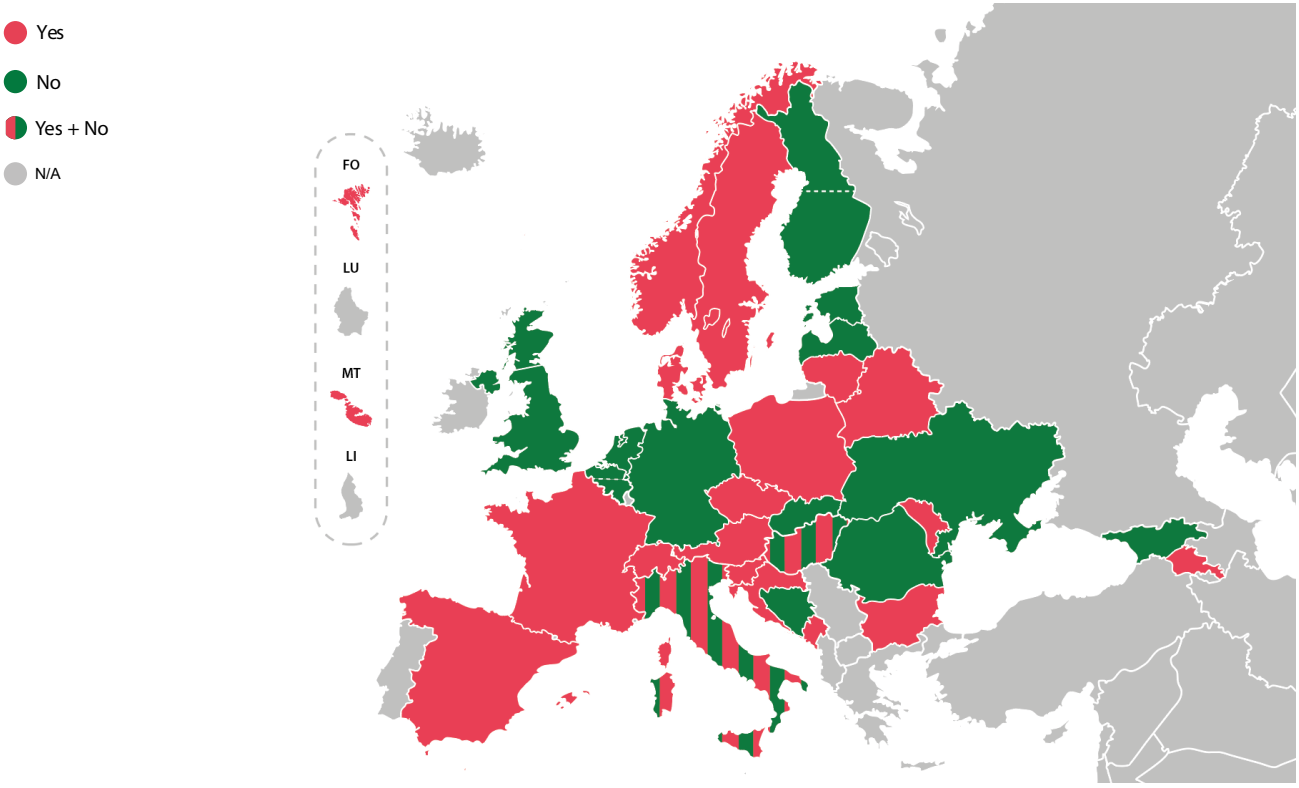
6.2. Existence of legal requirements to include externals (i.e. persons neither employed nor studying at a HEI) within HEI decision making bodies



With regard to institutional autonomy, ESU focussed on interference by public authorities regarding the composition of HEI decision-making bodies. As a shortcoming, ESU did not distinguish between different bodies (e.g. rectorate, senate, faulty council, board of trustees or other managerial boards, etc.).

Regarding requirements by law for higher education institutions to include externals in HEI decision-making bodies, this seems to be common in Northern, Western and Western European countries. This parallels differences in institutional design that can be observed between the Western/Continential higher education systems and those influenced by the Soviet model of higher education.

6.3. Public authorities having an influence into the appointment of members of HEI decision making bodies



In addition, 50% of NUSs report that public authorities have a say in the appointment of members of HEIs decision making-bodies. In Hungary this is true for HEIs which are funded by public trusts and in Italy for HEIs where the public authorities are stakeholders of the HEI. In four countries PAs formally appoint representatives without having any substantial say; in four countries PAs have the power to deny a nomination but cannot propose nominees; in four countries PAs propose nominees to be approved by HEIs; and in seven countries PAs directly appoint their own personnel into the decision-making bodies of HEIs (Armenia, Austria, Croatia, Latvia, Montenegro, Norway, Slovenia). Two NUSs report that public authorities have intensified their interventions (UK and Latvia). In addition, through the introduction of the trust fund model, Hungarian public authorities intensified their influence on private higher education institutions (ESU, 2023b).

Campus integrity/safety

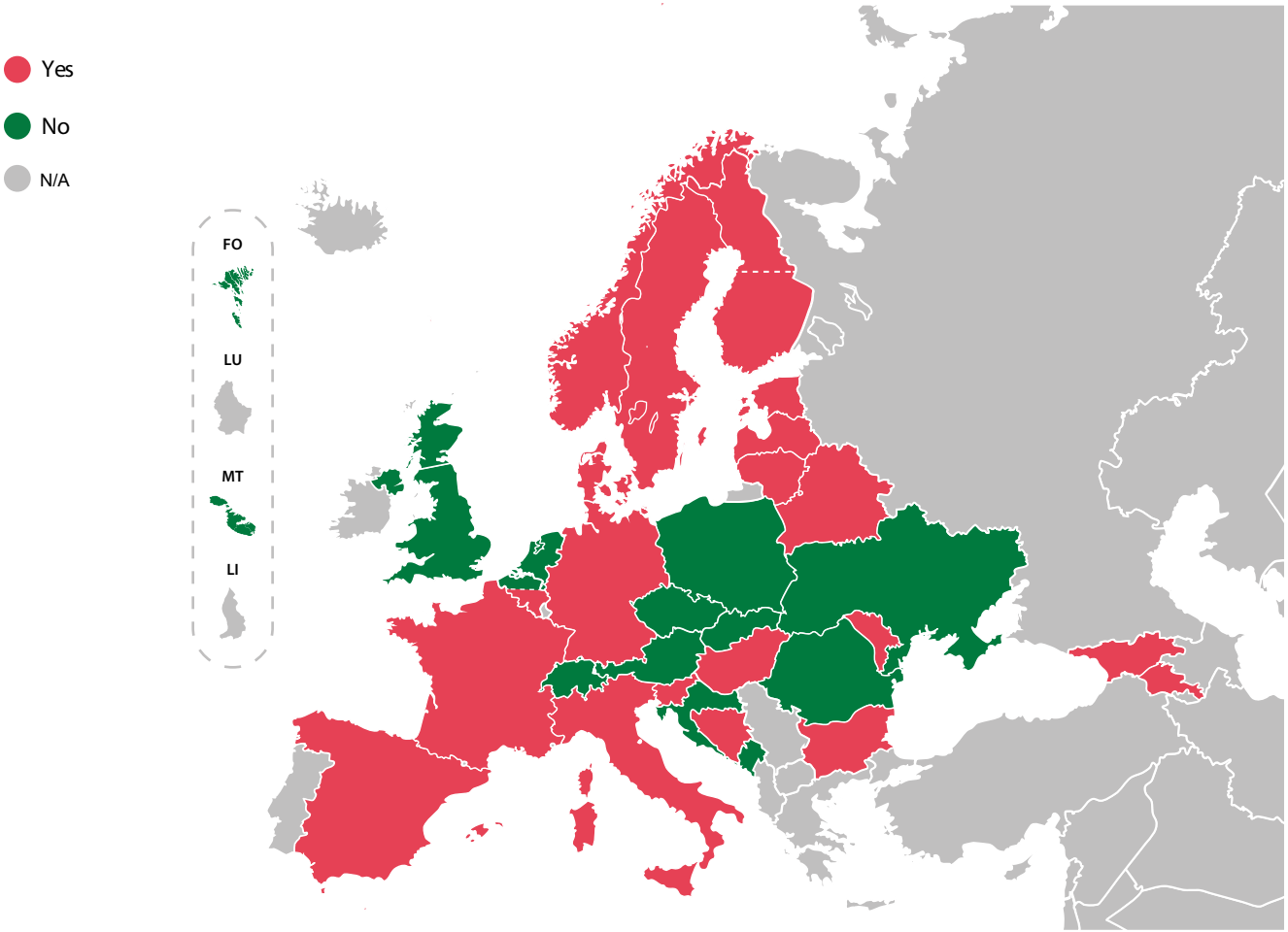
Regarding the safety on campus with regard to police forces being able to enter HEIs premises, in a majority of countries NUSs believe that police can enter HEI premises without any need for authorisation by HEIs. In others police forces may enter if called for an emergency but otherwise will not enter premises without authorisation. Besides Belarus, where police and HEIs collaborate in persecutions on and off campus, Greece is the only current negative example when it comes to campus integrity in systematic terms. Police used to be prohibited from entering HEI premises due to their role during the Greek dictatorship, but in 2022 public authorities deliberately deployed riot police forces on campus to create a climate of fear and to persecute students (Kitsantonis, 2022).

C. Responsibility of and for higher education
Commodification and financing of higher education

As ESU connects questions of the responsibility of and for higher education closely to issues of commodification, which especially in the Western and Western European countries manifests itself through principles of new public management in today's higher education landscape. Almost 70% of the NUSs are dissatisfied with the current amount of public funding for HEIs, while only Bosnian

union SURS and the Dutch union ISO reported to be satisfied. This overall signals an extremely worrisome financial state of higher education in Europe and implies that the repeated ministerial commitments to sufficiently fund HEIs are not being honoured in reality.

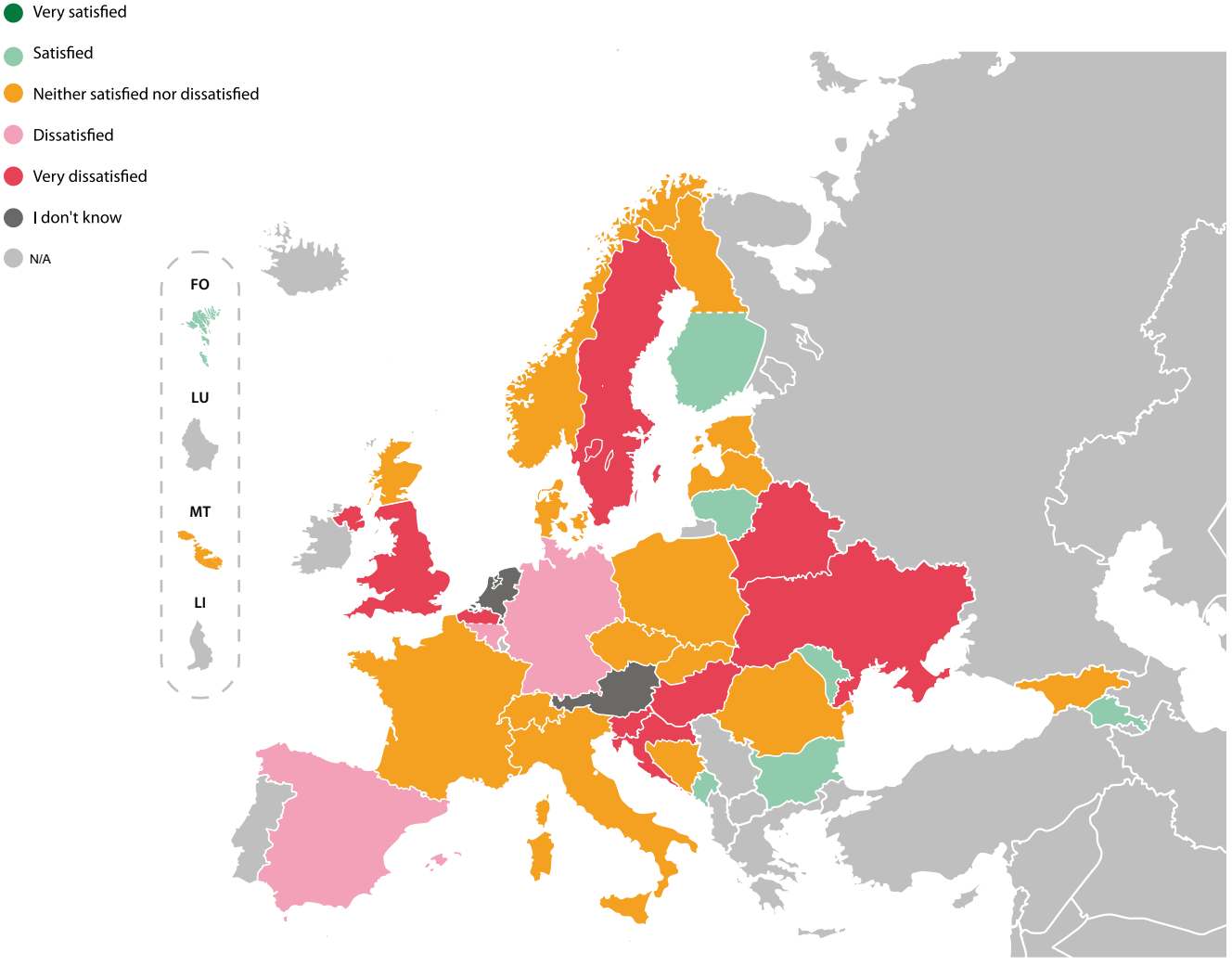
6.4. Presence of for-profit private actors and foundations in decision making bodies of public HEIs



Following the argument that the involvement of corporations and the growth of privately sponsored research have implications for academic freedom (Altbach, 2001), ESU asked about the presence of for-profit/private actors and foundations in decision-making bodies of public HEIs. 58.3% of NUSs answered that such actors are involved in HEIs decision-making bodies. These actors can most commonly be found within HEIs management boards. Apart from that, a few unions report that these actors are members of senates (Belarus, Bulgaria, Spain, Georgia, Iceland) and/or members of faculty councils (Italy, Latvia, Norway, Sweden), which worryingly means that private for-profit actors can directly interfere in HEIs autonomous decision-making processes on these levels. A very negative example of externally controlled governance is the University of Reykjavík in Iceland, where the Board of Directors is made up entirely by the private sector and appoints the President of the university, who in turn appoints the other executive roles.

In addition to this very direct way of interference, for-profit/private actors also have indirect means of influencing HEIs. These range from providing monetary resources both through contractual means and donations as well as providing material resources including buildings, with some actors focussing more on specific educational programmes and others more on specific research that is of their interest. Furthermore, the financing of students through stipends and scholarships are cited as indirect ways of influencing HEIs, both in their ability to offer study/doctoral spots and the students selected to be able to study. In Italy, private actors audit study programmes both on faculty and at department level, assessing also the employability of graduates.

6.5. Satisfaction with the transparency of HEI decision making towards the public

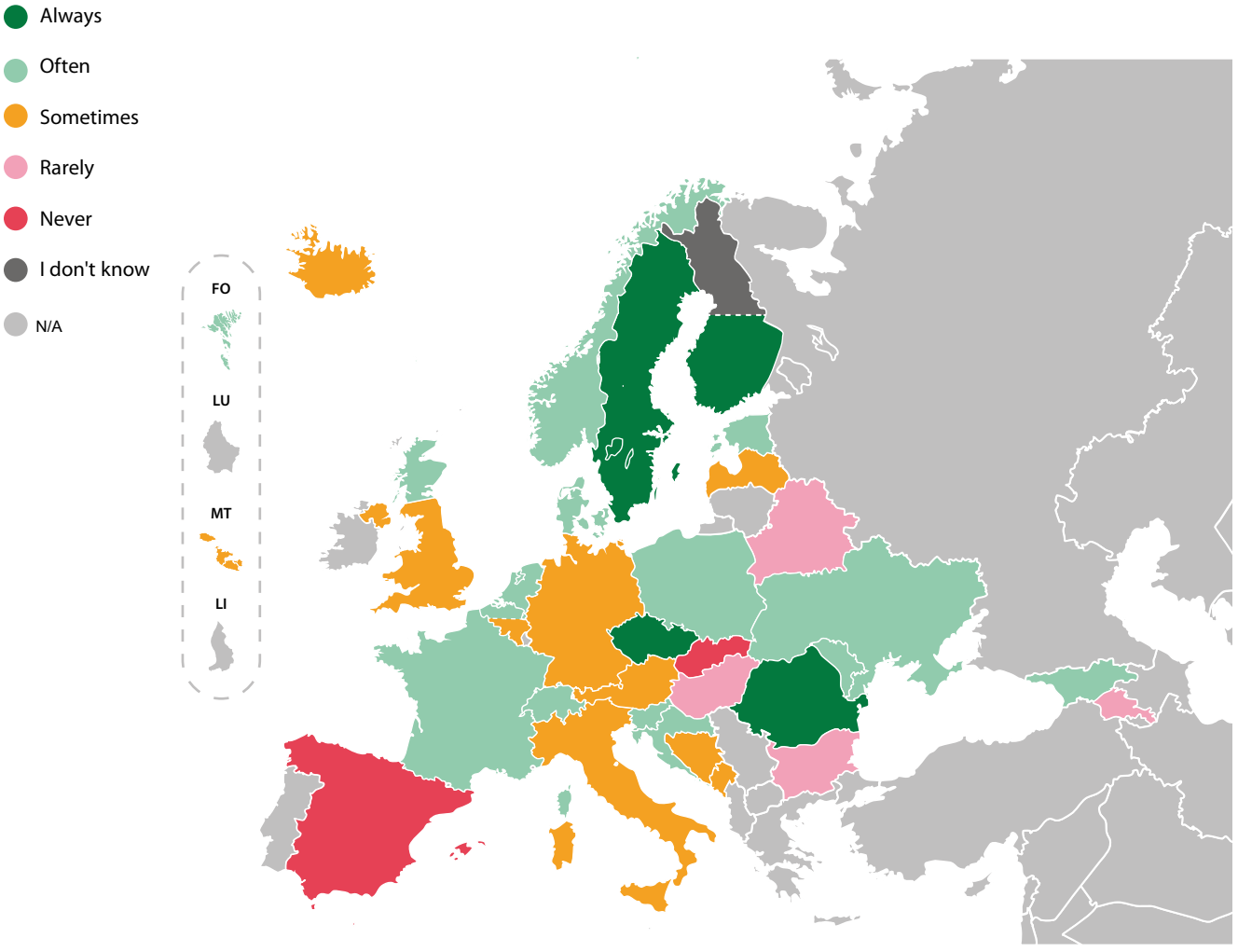


In terms of the satisfaction level of NUSs regarding the transparency of HEIs decision-making towards the public, only 50% of NUSs are satisfied, indicating a need for more transparency. This holds particular significance given the pervasive decline in public trust towards academia across many European countries. Rebuilding and preserving this trust in higher education hinges directly on whether academia is perceived as operating within an ivory-tower, detached and elitist manner, or rather as serving a purpose for the general public regarding the third mission of higher education. Transparency stands as a fundamental prerequisite in achieving this objective, both in regards to the academic community itself and the public.

D. Academic Integrity

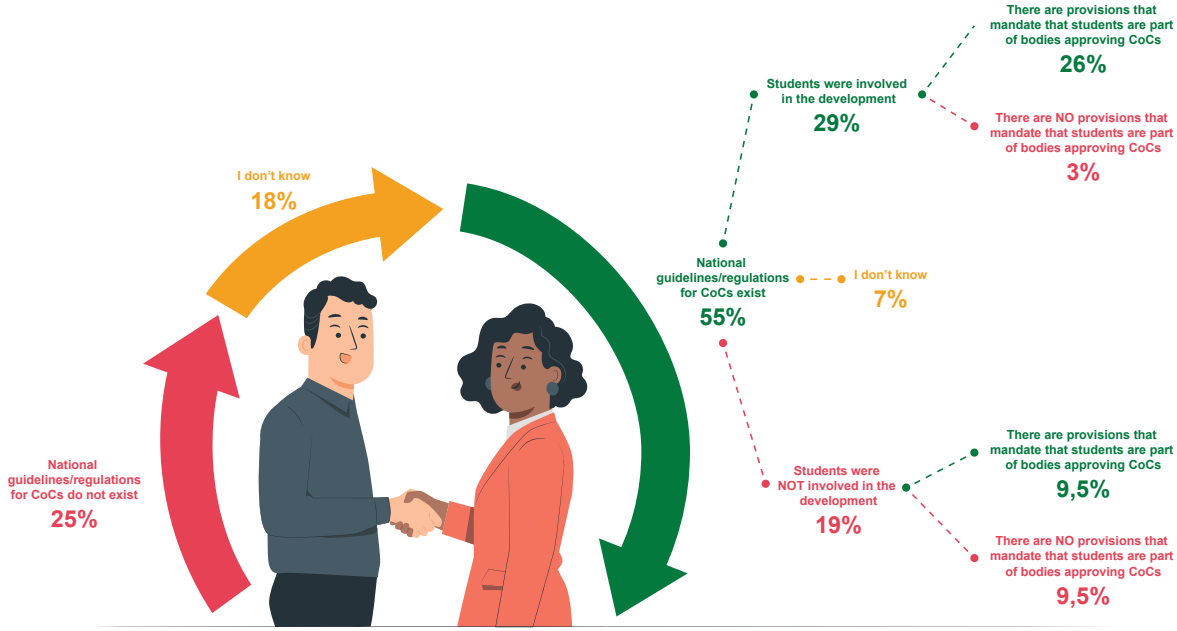
Academic integrity is an integral value of academia and as such should be included in curricula, translated into regulations and processes regarding (mis)conduct, and always be upheld, especially given the rapid digital transformation of higher education.

6.6. Existence of provisions for training for students on academic integrity (incl. plagiarism and academic fraud) by HEIs



Regarding the question whether higher education institutions provide training for students on academic integrity, including issues such as plagiarism and academic fraud, 54% answered that this is the case 'always' or 'often', with a further 27% of unions answering 'sometimes'. Meanwhile 16.2% of unions answered negatively, among them Armenia, Bulgaria, Belarus and Hungary where this is rarely the case, and Slovakia and Spain reporting that academic integrity is not included in curricula at all. Given that students are academics in training, no matter if they stay within the academic or research world after graduation or not, these numbers are surprising and worrisome at the same time. Students are producing scientific work throughout their studies and expected to not only uphold scientific standards but also follow good conduct. To this end, HEIs have a duty to provide training on academic integrity and the varying lack of inclusion of the topic into curricula among European higher education systems (overall almost 86.5%) signals a fundamental shortcoming to this end.

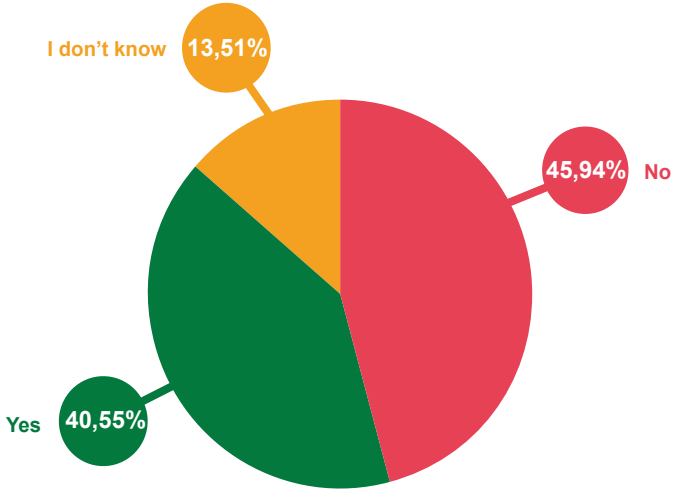
6.7. Existence of top level regulations/guidelines on Code of Ethics/Conducts for HEIs



With regard to the existence of national guidelines or regulations regarding the existence and implementation of Code of Ethics/Conduct (in the following CoC), 62.2% of NUSs report that such national level frameworks exist, while 21.62% report that this does not exist in their country. Additionally, only in around half of the systems where such frameworks exist are student involved in the development of these guidelines/regulations and, similarly, only in half of the countries do provisions exist that mandate the inclusion of students in bodies approving CoCs at higher education institutional level. Thus, there is on the one hand a lack of national regulations regarding the implementation of CoCs on HEI level. On the other hand, where these do exist, a lack of inclusion of students as stakeholders in the development processes of a common national understanding for the framework of CoCs can be observed, as well as a lack of provisions that support the inclusion of students in processes related to CoCs on HEI level.

On a positive note, independent systems to report and address academic misconduct exist according to 73% of the NUSs, with 40% of NUSs reporting that those systems existed on national level and 56.8% reporting those systems being implemented on higher education institutional level. Only for a few countries including Bosnia and Herzegovina, Bulgaria, France, Georgia, Croatia, Norway, Poland, Romania and Sweden did NUSs report the existence of such systems on both national and HEI levels. Among those countries where NUSs reported that independent systems to report misconduct do not exist are Austria, Belarus, Czech Republic, Germany, Estonia, Finland, United Kingdom, Italy and Lithuania. In these countries, students and staff therefore are not able to both defend their own rights with regard to principles of academic integrity as well as not able to report cases of misconduct in a sufficient manner.

6.8. Existence of a top level regulatory framework on the usage of proctoring software for assignments and assessments within higher education



Lastly, as the rapid technological advances of recent years have also found their way into universities, driven in particular by the COVID-19 pandemic, it is all the more important to ensure that principles of academic integrity (including fairness, transparency and trust amongst others) are also adhered to in the digital spheres of higher education. So far only 40.5% of NUSs report that top-level regulatory frameworks for the usage of proctoring software for assignments and assessments within higher education have been adopted within their higher education system. In regard to the broader issue of artificial intelligence, Estonia and Slovenia stick out as the only countries with a top-level regulatory framework. Whereas in Estonia the national student union was involved in the development of the framework, in Slovenia students were not included. Additionally, in Norway, Austria, Bosnia and Herzegovina and Sweden, the development of such a framework is underway

with the NUSs involved. In Scotland, early stages of working groups have begun, and in the UK the QAA holds these discussions where students are involved as well. The Hungarian student union is in discussion with national authorities on the issue, and in Ukraine the NUS was part of working groups regarding the inclusion of some aspects of the usage of AI in the law on academic integrity. In Finland, universities developed their own framework in cooperation with student unions. In Germany, Spain and the Czech Republic, the rector conferences are in the process of establishing working groups, though only in the Czech Republic are students so far involved.

Overall, with regard to students, most of the EHEA member countries have not sufficiently implemented national frameworks and/or guidelines with regard to curricula, processes and independent systems to handle cases of misconduct as well as more specifically frameworks on the usage of proctoring and AI in higher education. Moreover, systemic involvement of students as stakeholders in the development and implementation of these aspects is lacking. This is worrying given that these tools are prone to infringe students' privacy and data protection rights, as well as discriminate against vulnerable, disadvantaged and underrepresented student groups (ESU, 2024). It should also be noted that tackling the issue of fraud in education not only means finding tools to detect and further prevent the spreading of fraud but also to promote a culture of ethics and integrity (FraudSCAN, 2022) .

IV. Key takeaways and policy recommendations

Keeping in mind the various commitments and current process regarding the fundamental values of the Bologna process, the survey reveals significant issues related to academic freedom and student-specific freedom to learn, institutional autonomy, the responsibility for and of higher education, especially in regard to commodification processes, as well as academic integrity. These challenges, if unaddressed, will undermine the fundamental values of European higher education, raising questions that go way beyond the realm of higher education in terms of democratic values.

As already implicated through the previous chapter on student participation, violations of academic freedom of students, including threats and consequences for student activism are a worrying trend. To this end it is to be highlighted that '[a]cademic freedom, both an individual and collective right, becomes meaningless without collective support and defence (Popovic and Matei, 2022).' The widespread lack of processes of remedy means that students in most EHEA countries have no means to address their rights, other than lawsuits which are connected to high hurdles. Furthermore, the freedom to learn is being restricted in many countries through compulsory attendance as well as limitations regarding the free choice of study programs. The former can be seen as a result of a reflection of a deeply anchored wider moral panic in society in which students are often seen by the general public as lazy and cheating individuals that need to be coerced into higher education, resulting in a myth-driven focus on how students perform via measures such as mandatory attendance rather than what they actually learn and know and thus ignoring the reality that students are mature persons that choose higher education voluntarily with an eagerness to learn and prepare themselves for life (Macfarlane, 2016) .

In terms of institutional autonomy, especially in Western and Western European countries it has become the norm that public authorities interfere with higher education through requirements for external representation and/or direct appointment of own personnel of public authorities into different bodies of higher education institutions.

This follows the paradigm shift towards new public management of the last twenty years within the sector, whereby especially private for-profit actors such as companies are brought into steering positions of institutions, even though the marketisation and economisation of higher education has not delivered the results hoped for (Broucker, 2018) while negatively affecting higher education democracy and institutional autonomy. Dissatisfaction with the responsibility for higher education is strong, with public funding not being sufficient and commodification tendencies being on the rise.

1. Establishment of a European Students Rights Charter to safeguard student rights (paralleling the 1997 UNESCO Recommendation concerning the Status of Higher-Education Teaching Personnel)
2. Strengthening mechanisms for protecting academic freedom, particularly for students, through the establishment of independent bodies or processes for remedy.
3. Embedding of fundamental values (academic freedom, institutional autonomy, student and staff participation, responsibility of and for HE, academic integrity) in international and transnational treaties as well as through the integration in national constitutions and higher education laws.
4. Systematic inclusion of students and young people through social dialogue as well as during all decision-making processes and all stages of the policy-cycle.
5. Safeguarding the freedom to learn through the creation of national action plans encompassing policies to enhance access and inclusion in higher education.
6. Ensuring robust institutional autonomy by minimising interferences from public authorities in decision-making processes while strengthening and optimising inner-institutional accountability processes.
7. Addressing financial challenges in higher education through increased and sufficient public funding and limiting the influence of for-profit/private actors.
8. Promoting academic integrity by standardising training across institutions for staff and students to foster a culture of ethics and transparency and enhancing regulations for reporting and addressing misconduct, including the establishment of code of conducts or similar instruments.
9. Accelerating the development and implementation of regulatory frameworks for emerging technologies in education, with a focus on transparency and student involvement as well as the safeguarding of fundamental rights of students.
10. Enhancing transparency in decision-making processes within higher education institutions and at the top level.

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Social dimension

I. Introduction and commitments

Despite being mentioned as a topic within the Bologna Process since early stages, the development of policy and commitments within the European Higher Education Area has been traditionally slower in the field of social dimension in comparison with other areas of cooperation, nevertheless with a special growing momentum of importance in recent years.

From a historical perspective, ESU had a particular and vested interest in ensuring that social dimension becomes and remains at the top of the ministers' agenda since the early stages, and as such has been the stronger advocate for social dimension in EHEA. This has also been the case in recent years by the leadership of ESU in the elaboration and adoption of the Principles and Guidelines on Strengthening the Social Dimension of Higher Education in EHEA ('PAGs') in 2020, as well as the Indicators and Descriptors for the Principles of social dimension of higher education in EHEA ('Indicators and Descriptors') in 2024.

Currently, the overarching priorities and policies of ESU on social dimension are included in the Policy Paper on Social Dimension.

While significant progress has been achieved in terms of policy commitments, especially through the adoption of the PAGs, the reality on the ground did not shift significantly, on the contrary students' social condition being challenged in recent years by cost of living, increased tuition fees, grants not keeping pace with inflation, housing shortages and many others.

The present edition of the Bologna With Student Eyes publication is the first one after the approval of the PAGs and looks at the first three years of the decade-long overarching objective of EHEA, agreed upon in 2020, to make inclusivity a reality. Therefore, ESU will analyse the situation of social dimension in EHEA by using the PAGs as reference, with one subchapter for each topic and the indicators created by the Working Group on Social Dimension in the 2021-2024 cycle, which ESU co-chaired, as guidance. However, principle 9 ('Higher education institutions should ensure that community engagement in higher education promotes diversity, equity and inclusion') which

refers to the activity of higher education institutions, is missing as the activity of higher education institutions towards local communities could not have been properly covered through the survey of national unions of students.

Furthermore, in the aftermath of the Covid-19 pandemic and the inflation surge, student poverty has been widespread. The inflexible student support systems have dragged behind countries in their pursuit of reaching the objectives agreed upon in the Rome Communique. Based on this, a special subtopic of the social dimension chapter will be centred around student poverty and the (lack) of measures to tackle the phenomenon.

This chapter shows yet again that improving accessibility of higher education is a top priority for student unions, but governmental progress is, in the most cases, slow at best.

II. Bologna commitments

Ever since 2001, social dimension has been mentioned and expanded, to various degrees, in the future Bologna communiques. In the Berlin Communique (2003), social dimension has been wrongly put in antithesis with a 'competitive' higher education, even though the two must go hand in hand and one does not negate the other ('The need to increase competitiveness must be balanced with the objective of improving the social characteristics of the European Higher Education Area'). Within the same document the ministers included improving studying and living conditions and gender equality as objectives within the social dimension agenda and called for better data collection. The policy approach towards social dimension has been linked to broader societal objectives, seeing higher education as a way to improve social cohesion, democracy and quality of life.

The first concrete measure decided as a way to follow-up on the work of the members of the Bologna Process on social dimension came in 2005, when ministers decided in the Bergen Communique to 'report on our national strategies and policies for the social dimension, including action plans and measures to evaluate their effectiveness'. However, this commitment has translated into little effective practice, as countries were not stimulated and supported to create and report on these

national plans, despite a reiteration in the Leuven Communique (2009) where countries were expected to 'set measurable targets for widening overall participation and increasing participation of underrepresented groups in higher education to be reached by the end of the next decade'.
An overarching definition of the social dimension policies end goal came with the London Communique (2007), where ministers declared 'We share the societal aspiration that the student body entering, participating in and completing higher education at all levels should reflect the diversity of our populations.'
From 2007 to 2020, the expansion of social dimension in EHEA has worked rather horizontally than vertically, with new topics being referenced to having a link to social dimension. Alternative access routes and recognition of prior learning have been mentioned in the Bucharest Communique (2012), with lifelong learning and mobility included in the Yerevan Communique (2015), which also adopted the EHEA Strategy 'Widening Participation for Equity and Growth'. The latter has postulated that 'Making our systems more inclusive is an essential aim for the EHEA as our populations become more and more diversified, also due to immigration and demographic changes'.

Promoting social dimension of higher education in Europe received an important boost through the recent approval of the Principles and Guidelines to Strengthen the Social Dimension of Higher Education in the European Higher Education Area (from this point onwards abbreviated as 'PAGs') as an Annex II to the Rome Communique (2020). The PAGs, written by the Bologna Follow-Up Group Working Group on Social Dimension, are the first comprehensive and coherent set of commitments that ministers agreed upon in advancing social dimension in Bologna.

PAGs take forward the previous work within the EHEA and add to the definition of social dimension coined through the London Communique (2007) that social dimension encompasses a desired inclusive environment that fosters equity, diversity and is responsive to the needs of the local communities.

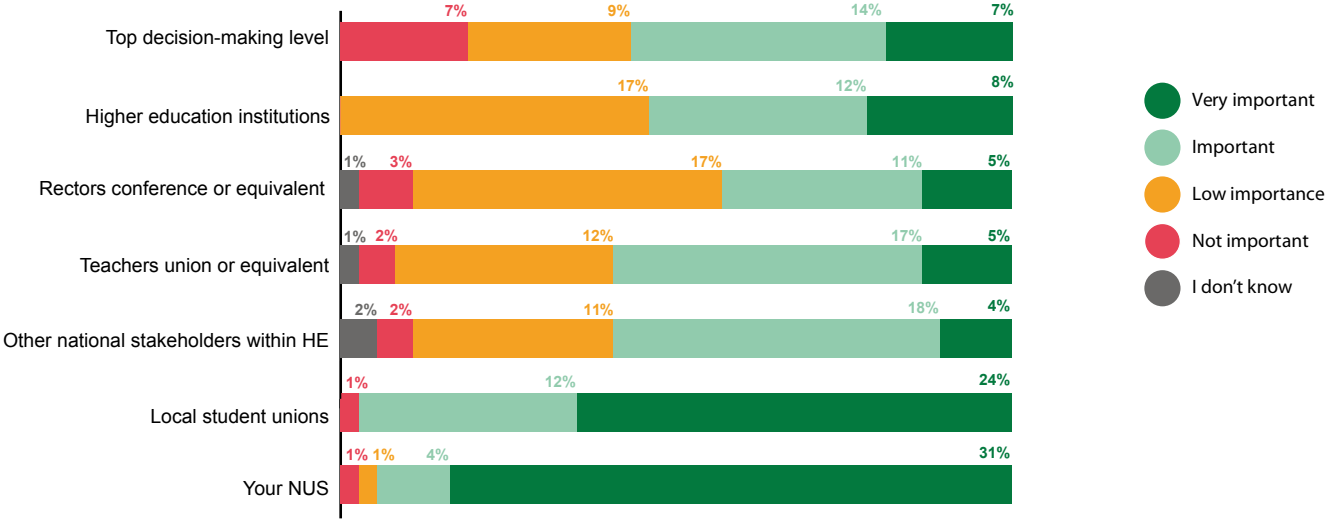
The PAGs are meant to set principles that ensure quality higher education is universally accessible, while guidelines have the role to interpret the principles and support their operationalisation in practice, with the public authorities (especially ministries of higher education) called to make sure

that the agreed upon shared principles are effective implemented in all EHEA countries. The PAGs are centred around 10 principles: strategies on social dimension, flexibility, lifelong learning, data, guidance and counselling, funding, staff training and institutional mission, mobility, community engagement and policy dialogue.

III. Analysis of Bologna commitments implementation

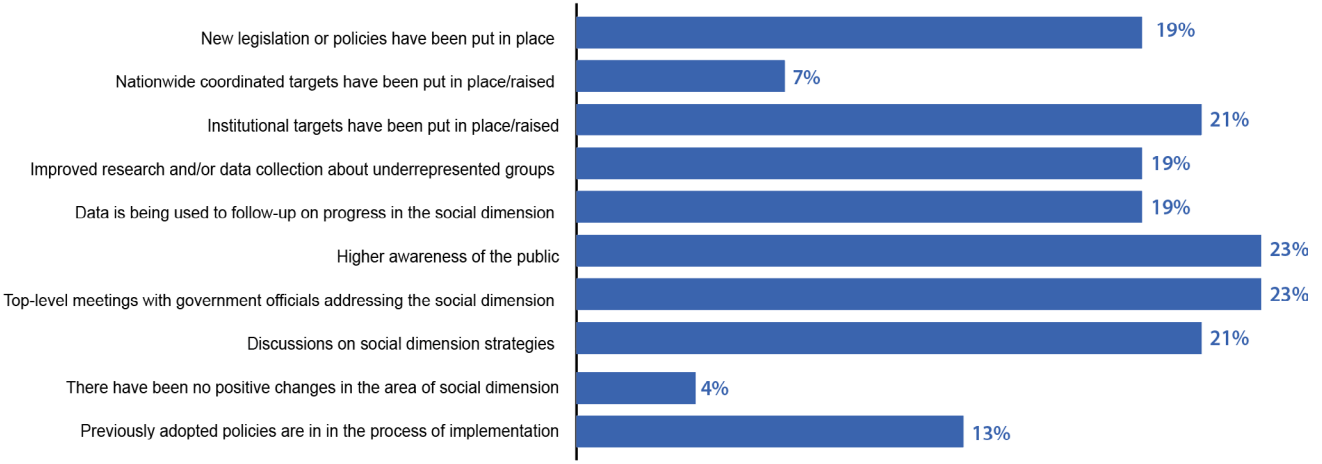
I. General perception of NUSes regarding the importance of social dimension

7.1. Perception of NUSes of the prioritisation of the social dimension by different stakeholders



To begin with, NUSes were asked whether they perceived stakeholders as prioritising social dimension policies. While few would declaratively mention that the social dimension is not an important topic, this question is meant to gauge the perspective of national unions of students based on what actions these stakeholders take. As expected, NUSes and local unions are perceived as the stakeholders advocating for social dimension the most. Social dimension policies are perceived as important or very important to them in around 95% of cases. As for other stakeholders, 57.14% of NUSes believe that their governments prioritise the social dimension, with an even lesser 52.7% reporting the priority for HEIs. In comparison to the 2020 Bologna With Student Eyes edition, NUSes overall observe a slight shift towards more prioritisation of social dimension policies, aligning with the pandemic's profound and long lasting impact on students.

7.2. Progress regarding the social dimension of higher education since 2020

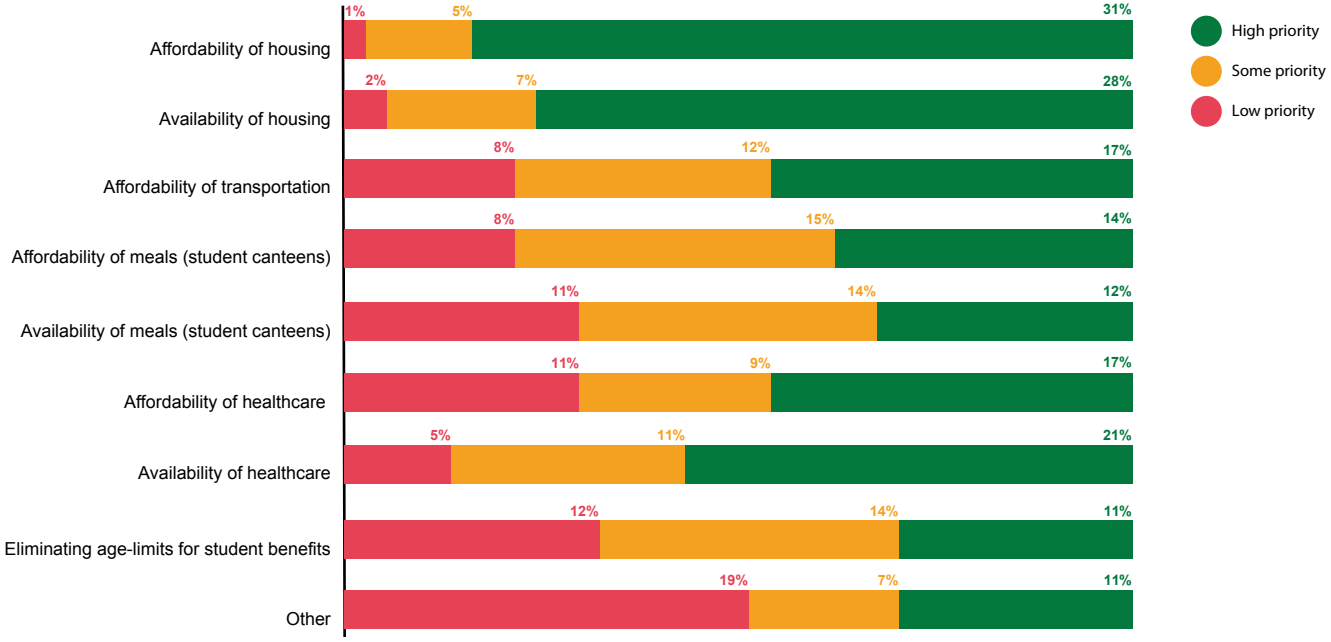


It was further inquired how NUSes assess the progress on social dimension policies in their HE systems since 2020. A welcoming result is that in only 4 jurisdictions out of 36 (11.1%) NUSes affirmed that no progress has been made. Both the recent adoption of the PAGs, as well as the crises of recent years that countries were expected to respond to can be considered as factors creating incentives for governments to speed up implementation of previous EHEA commitments. In 61.1% of HE systems, NUSes reported higher public awareness and meetings with government officials addressing social dimension, while for 55.5% of cases the discussions aimed specifically at social dimension strategies.

Despite these progresses, achievement in terms of specific or more ambitious tailored measures has been generally lower, with a downward trend from institutional to national levels: while in 55% of cases institutional targets for social dimension have been put in place or raised, the percentage drops to 16.6% to national targets. However, 50% of jurisdictions have enacted new legislation or policies in social dimension, usually as a response to COVID-19 crisis or its aftermath, including the energy crisis.

As a very positive example Austria sticks out, where stakeholders take part in a wide framework of implementing a national strategy on social dimension, which takes into account the PAGs, with the work currently continuing in regards to implementing and mainstreaming this strategy. Contrary to this, the Armenian, Bosnian, Slovenian, Italian and Belarusian student unions reported no progress at all. The Italian student union UDU elaborated on the structural lack of financing by the government and regions in order to support an inclusive higher education system.

7.3. Ranking of student support systems according to NUSs perception of a need for prioritisation for the advancement of the social dimension of higher education



Furthermore, ESU asked unions to mention which policies related to student support services are prioritised in their advocacy work. While all types of student support systems need to be structurally financed and ensured by the governments, this offers a glimpse into what concrete challenges students are more acutely facing and thus form the basis of the national unions of students' advocacy. It is evident that affordable housing, alongside housing availability, holds the top spot, which does not come as a surprise given the rise in rents as well as the general lack of building new housing infrastructure in many parts of Europe in recent years. For the topic of housing and transportation, ESU has adopted a Statement in 2021 (ESU, 2021). Following closely are the accessibility and affordability of healthcare, especially linked to the current issues related to the mental health of students.

In the open answers, unions pointed out different aspects related to students' finances and students' health. NUS Scotland mentioned that while an energy bill support was put in place for several disadvantaged societal groups, student households did not receive targeted support, making it a high priority for their work. The Flemish student union VVS highlighted additional financial resources bound to be used for the creation and maintenance of social services, including relatively affordable psychological support, doctors for students and study loans as a priority. The Spanish union CREUP mentioned guaranteed resources and adaptations for students with disabilities as a high priority, as did the Latvian union LSA in regards to the need for the availability of digital infrastructure and online study platforms to support students, especially those with mobility restrictions. The Italian union UDU referred to support services for students' wellbeing and mental health, access to healthcare free of charge, material conditions of student residences, incrementing the number of students eligible for student grants and abolition of the status of 'eligible but not beneficiary' for student grants. In light of these challenges, unions also put forward several resolutions related to student support services that ESU adopted in our Board Meetings, which can be found online[1].

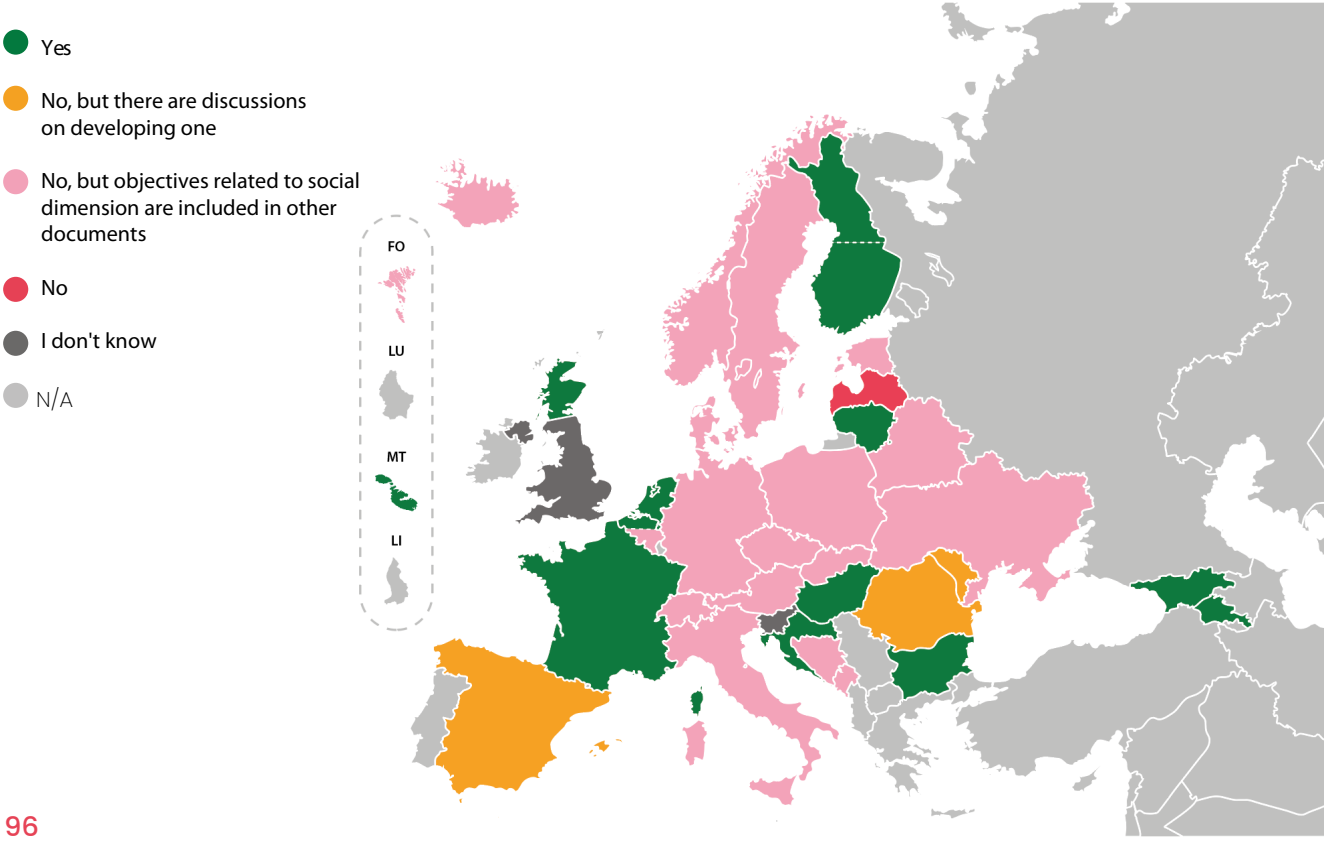
[1] https://esu-online.org/category-policies/resolutions/

1. Principle I: Strategies

Principle 1 of the PAGs stipulates that 'the social dimension should be central to higher education strategies at system and institutional level, as well as at the EHEA and the EU level.' This principle is accompanied by two guidelines regarding targets and broad-based dialogue.

Top level strategies

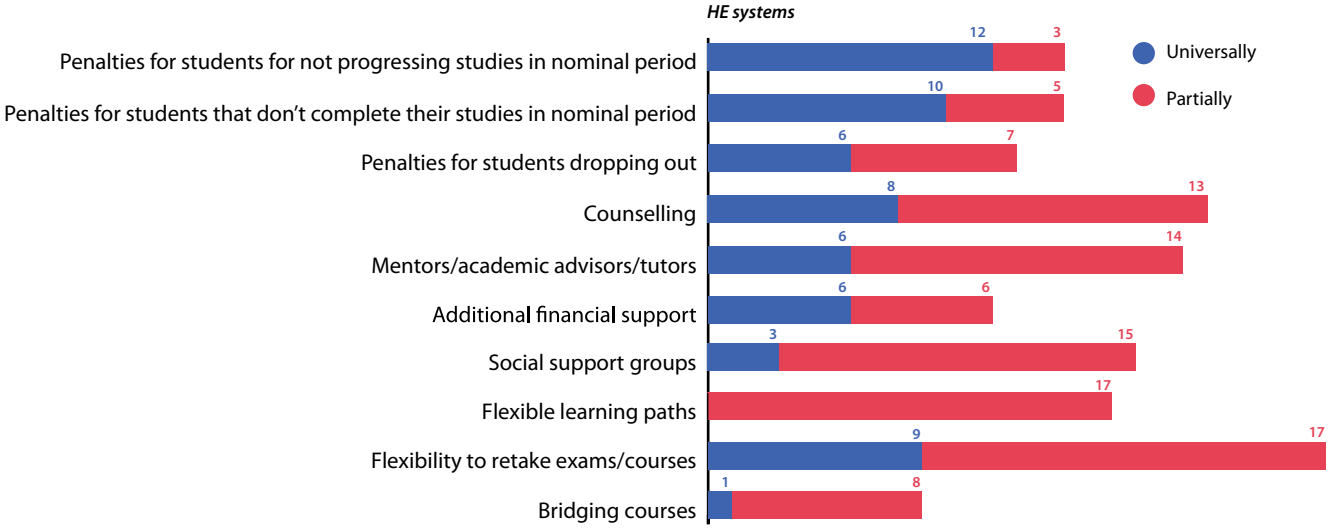
7.4. Existence of top level strategies or major policy plans on the social dimension



Asked about the existence of such national strategies or major policy plans with regard to students, only 33% of NUSs answered positively, with a further 54% answering that objectives at least are included elsewhere and a further 8% answering that the development of such a strategy is currently discussed. Latvia stands out as the only country where the NUS reported that no strategies nor other documents with objectives seem to exist. Only a quarter of the NUSs report that these strategies or documents that include objectives to the social dimension have either legal/formal power or no legal/formal power but are included in other documents with legal/formal power. These figures stand in contrast to the 2024 draft Bologna Process Implementation report (BPIR), where a majority of countries reported to have strategies in place. Given that many unions reported not to be included by public authorities in all phases of the policy cycle, including the continuous assessment of policies (ibid.), the discrepancies are not surprising and may point to various problems such as a lack of continued knowledge about the existence of the policies, and moreover, a lack of inclusion and currency regarding the development of the policy (e.g. via assessments and continuous collaborative working), as well as possibly discrepancies in whether NUSs and public authorities assess certain existing documents to count as strategies or not. Similarly to the BPIR, with regard to the inclusion of social dimension in quality assurance 81% of NUSs reported that this was done directly or indirectly. Contrary to the BPIR, NUSs reported that in Wallonia, the Czech Republic, Estonia and France the social dimension is not part of quality assurance in any form.

Targets and measures

7.5. Existence of measures to decrease dropout levels



As to the concrete targets aiming at widening access, supporting participation in and completion of studies, the BPIR only surveyed whether measurable targets exist. ESU went a step further and operationalised this principle by inquiring measures in place to decrease dropout levels. ESU believes that this is a key element through which it can be determined whether strategies actually foster or hinder social policy.

In the majority of countries penalties for not progressing studies in the nominal period (38%), penalties for not completing studies in the nominal period (24%) and penalties for dropping out of one's studies (35%) are common across all HEIs, even though these measures are known to hinder equity and inclusion. Contrary to that, measures that foster equity and inclusion usually only exist at HEIs that decide themselves to implement them, suggesting a lack of systematic implementation of these positive measures across countries. Most common are counselling and mentoring services as well as the possibility for flexible learning pathways and to retake exams/courses. Standing out, Latvia reported the possibility to take up to a year off from one's studies while retaining the source of financing for the studies.

Top level strategies and ground-level support

In addition to the question on whether top level strategies exist and what kind of measures are in place, ESU surveyed NUSs also about measures taken by top-level authorities to support the implementation of social dimension policies on institutional level. 49% of NUSs reported that PAs provide additional funding to HEIs implementing social dimension policies. 27% of NUSs reported that HEIs are required by law to develop social dimension policies and a further 27% reported that there are recommendations for HEIs to develop such policies. On the other hand, the withholding of funding from HEIs as a negative incentivisation measure to implement social dimension policies was only reported by 13.5% of NUSs (Austria, Flanders, Finland in regards to Universities, Malta). The British NUS elaborated that the government supplies additional funding to HEIs which successfully widen access to higher education, thus incentivising recruitment. In the Netherlands HEIs are required by PAs to report their activities on the social dimension annually.

On a positive note 54% NUSs reported that students are being involved both in the evaluation and assessment of social dimension policies at higher education institutional level. Only 11% NUSs reported that students are not being involved at all (Belarus, Faroe Islands, Italy, Moldova). Furthermore 41% of the NUSs report that there is a requirement from top-level authorities to include student representatives and a further 27% that there is at least a recommendation.

2. Principle II: Flexibility and Recognition of Prior Learning

According to Principle 2 of the PAGs, there shall be legal regulations and/or policies in place to allow HEIs to widen access to, participation in and completion of higher education studies. To this end, the recognition of prior formal and non-formal learning is named concretely as a tool to achieve this goal.

As a general overview, in most EHEA countries national regulations allow HEIs to flexibly design their study programmes. According to NUSes, part-time studies are available in 92% of HE systems, while blended, online or distance learning-based study programmes are available for all types of HEIs in 80% of HE systems. Another aspect to take into account is whether different types of study programmes are not only allowed, but also funded by the national authorities. In this case, NUSes report that while full-time studies are funded, by a variation of funding systems, in all EHEA countries, this is true for part-time studies in around two thirds of HE systems. On the contrary, blended, online or distance-learning programmes are usually not funded.

We also asked NUSes the extent to which the outcomes of full-time and part-time studies are valued equally. In 3 countries NUSes said that is not the case, namely Armenia, Slovenia and Slovakia. For example, in Slovakia the union reports that different opinions and views are held for example by employers and other stakeholders on the outcomes of part-time studies.

Apart from the flexibility of the design of study programmes, ESU also asked NUSes questions related to the flexibility within the study programme in order to support completion of studies. ESU inquired about the existence and spread of seven measures: 1. insertion/immersion courses, 2. targeted guidance, counselling or mentoring, 3. support for learning and organisational skills, 4. flexible curriculum/progression routes within study programmes, 5. provision of adapted infrastructure, 6. provisions for alternative assessments, 7. external QA monitoring of institutional policies on student-centred learning for underrepresented groups. In all cases, around 40-50% of the unions reported the existence of such measures, with only targeted guidance, counselling and mentoring being less common (32%). At the same time, there are differences in the systematisation of these measures,

with measures being seldomly implemented systematically across all HEIs rather than being existent on a HEI by HEI basis. Insertion/immersion courses and guidance/counselling/mentoring programmes for vulnerable, disadvantaged and underrepresented groups are nearly nowhere implemented systematically across all HEIs. The other measures were reported to be implemented by all HEIs in 10-20% of countries, therefore largely also lacking in systematisation.

Within the Principle 2, a cornerstone of ensuring accessibility through flexibility is the promotion of recognition of prior non-formal and informal learning ('RPL'). While a significant area of cooperation within EHEA several years ago, RPL is treated now more as an 'old' topic which has been already tackled, which is definitely not the case. RPL can support students in both accessing higher education and progressing in HE. Apart from enhancing the inclusivity of the HE, it also embeds its links with non-formal and informal learning, recognising and valuing their role. Finally, it also offers a chance for students to make best use of the knowledge and skills obtained through non-formal and informal learning, pointing to student-centred learning..

RPL is relevant also in the context of other policy processes or areas. It is the object of a EU's 2012 Council Recommendation on the validation of non-formal and informal learning (EU Council, 2012), and subsequent guidance by the European Centre for the Development of Vocational Training (CEDEFOP). However, the focus in those cases was on other sectors rather than HE, for example in VET. Furthermore, RPL is linked to recognition policies and is included in the Standards and Guidelines on Quality Assurance in EHEA ('ESGs').

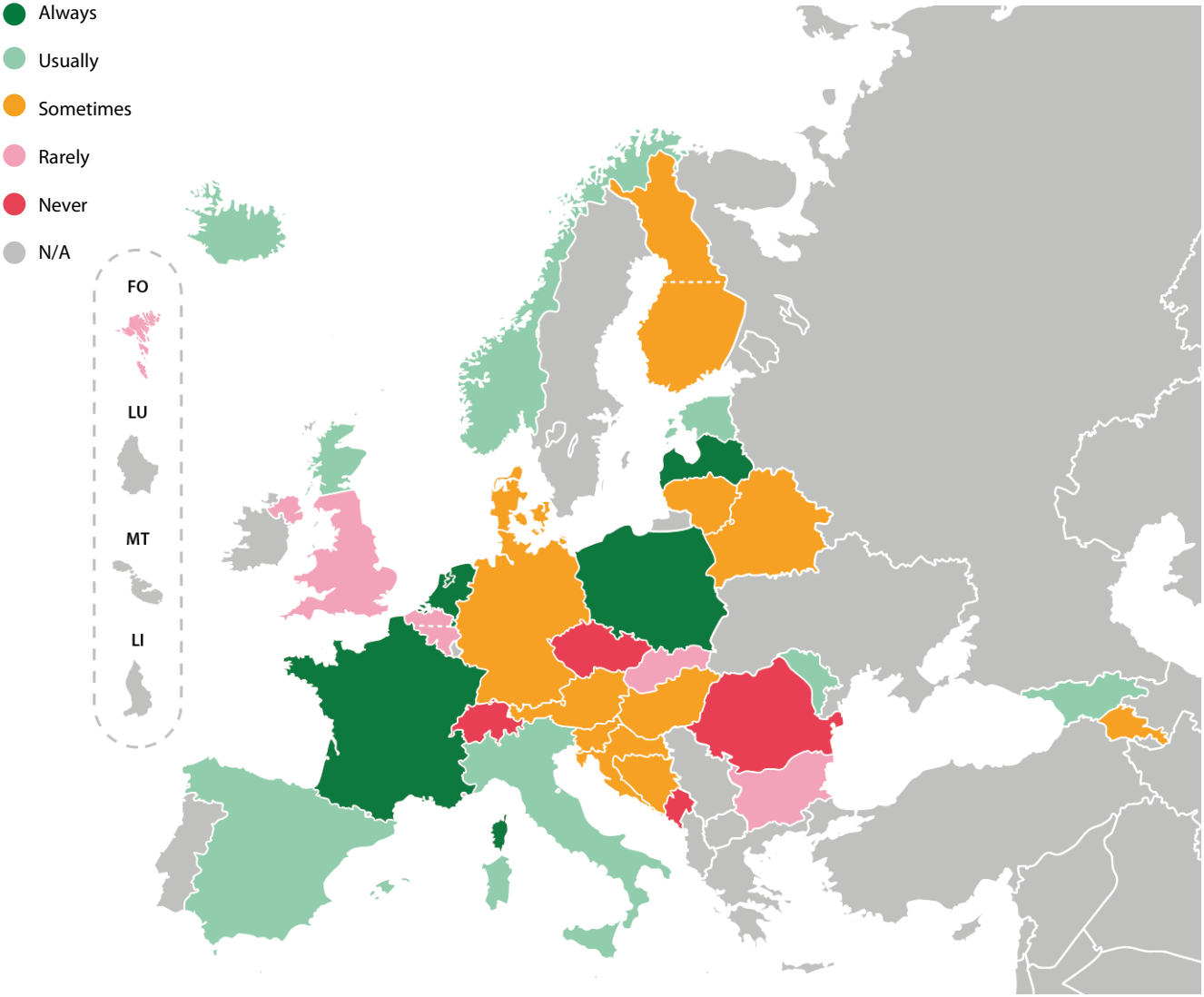
Despite this, RPL is recognised as a right of students in only 14 HE systems, while in 8 systems it is not even mentioned at all in top level legislation. Unions report that RPL can be used for enrolling in HE in 17 systems, for proceeding to the next cycle in 11 systems and for progressing within a study programme in 22 systems. We can conclude that in less than half of the countries of EHEA the recognition of prior learning can be used for any of the prescribed functionalities. Furthermore, RPL for accessing HE, the most relevant one for the topic of social dimension, is used in the least number of countries. While the trend is consistent with the results of the 2024 Bologna Process Implementation Report, the scale is different, with countries reporting the possibility to use RPL for progressing in HE

in 35 systems (out of 47 surveyed, in comparison with 37 for ESU) and for accessing HE in 21 systems. This may be explainable to some extent in light of some answers of unions that mention RPL as a technical possibility (or not being prohibited), despite not being applied in practice (for example because of lack of methodological guidance).

In relation to the quality assurance of RPL, in 21 systems the national quality assurance framework includes standards related to RPL. On a broader scale, only 15 public authorities monitor the use of RPL in the higher education institutions. Despite being a useful tool for the recognition of qualifications of undocumented migrants, only 13 HE systems use RPL for this purpose.

As to the availability of RPL for students within the HE system several unions assessed RPL to be never used/not implemented (Czech Republic, Montenegro, Romania and Switzerland) with a further majority reporting an inconsistent use/implementation, while only four unions (France, Netherlands, Latvia and Poland) reported a consistent use of/implementation of RPL.

7.6. Availability of recognition of prior learning for students

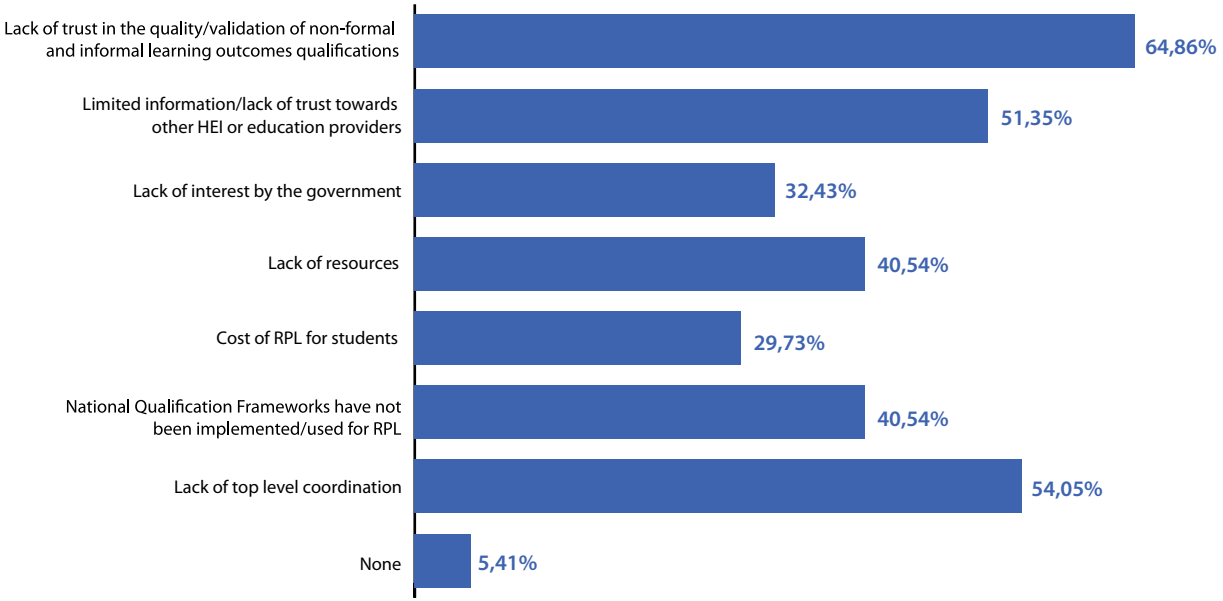


Finally, ESU looked into what the national unions perceive as barriers for promoting recognition of prior learning. The most common barrier was 'Lack of trust in the quality/validation of non-formal and informal learning outcomes qualifications' (65% of cases), which points out both the lack of sufficient cooperation between formal and non-formal sectors, as well as insufficiently developed validation systems, despite European guidance. The result has also increased from 47.2% in the 2020 edition of BWSE.

The following barriers are lack of top-level coordination from the national authority and 'Limited information and a lack of trust from HEIs towards other HEI or education providers', standing above 50%. The lack of coordination speaks to a situation where despite not being prohibited, HEIs do not implement it because there is insufficient methodological guidance from national level. Around 40% of respondents believe that barriers are also related to lack of resources for RPL and that the National Qualification Frameworks (NQF) have not been implemented or their potential hasn't been used fully for RPL. It is worth noting that in 2020, for the same question only 30% of unions pointed to lack of resources while 19.4% reported the insufficient use of NQFs as a barrier.

Lack of interest by the government as a barrier has decreased from 50% in 2020 to 32.4% in 2024, while the cost of RPL for students was identified as a barrier in 29.7% of cases, compared to 13.8% of cases in 2024.

7.7. Perceived main barriers for the implementation of recognition of prior learning



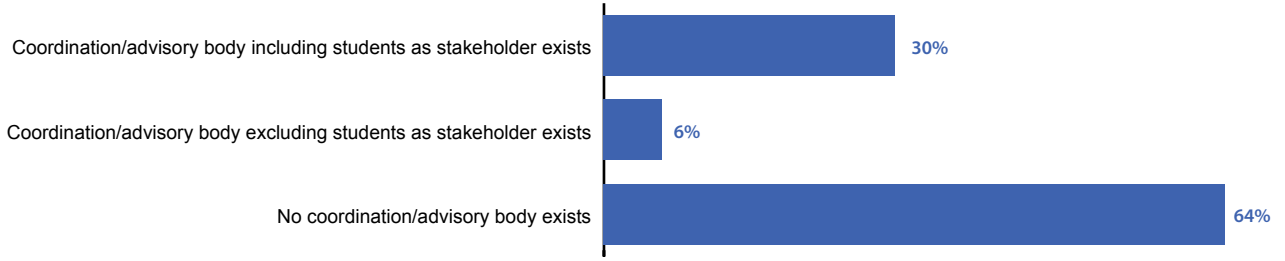
Unions were also asked to provide specific insights into the challenges faced in recognising prior-learning, as well as good practices. The Austrian union ÖH mentioned that 'it is not always clear what has to be recognized and how, with the result that HEIs rather don't recognize at all or just recognize very little of what the students could really have recognized', while the German union fzs pointed out that 'HEIs are often reluctant or not interested in the recognition of any non-academic credits, or don't know about legal basis'. SAMOK from Finland mentioned that there is a too strict interpretation of learning outcomes, and that RPL has issues with flexibility, for example when study fields are different. SYL, also from Finland, pointed out a good practice that student representatives can receive credits for their work via RPL. On a broader scale, the French union FAGE mentioned that RPL is used for valuing student commitment and there are dedicated diploma endorsements. On the other side, they also refer to lack of top-level coordination, where each department can decide on their evaluation methods and some experiences are not considered part of RPL.

Overall, unions mentioned as required factors for the success of RPL: top level coordination, guidance for students, more trust in students, better communication with all stakeholders, more resources for RPL, including for training staff, as well as better coordination with student unions.

3. Principle III: Synergies and lifelong learning

Principle III states, 'the inclusiveness of the entire education system should be improved by developing coherent policies from early childhood education, through schooling to higher education and throughout lifelong learning,' especially through social dimension targets regarding increasing student participation in, facilitating completion of and increasing access to higher education.

7.8. Existence of coordination of social dimension policies across different education levels



Asked about whether there is systematic coordination between top level authorities regarding different education levels (eg. schools, higher education, lifelong learning), matching the numbers BPIR 2024, only 30% reported the existence of coordination/advisory groups in which students as stakeholders are invited or the existence without the participation of students. 64% of NUSs reported that no such coordination was implemented, pointing towards a lack of systematic governmental whole-school approaches in terms of a holistic approach to education under the inclusion of all

relevant stakeholder groups in most countries. As a good-practice example the Latvian advisory board 'Education for All' and the Flemish 'Vlaamse Onderwijsraad' are to be mentioned, where learners including the student unions are included amongst other stakeholder.

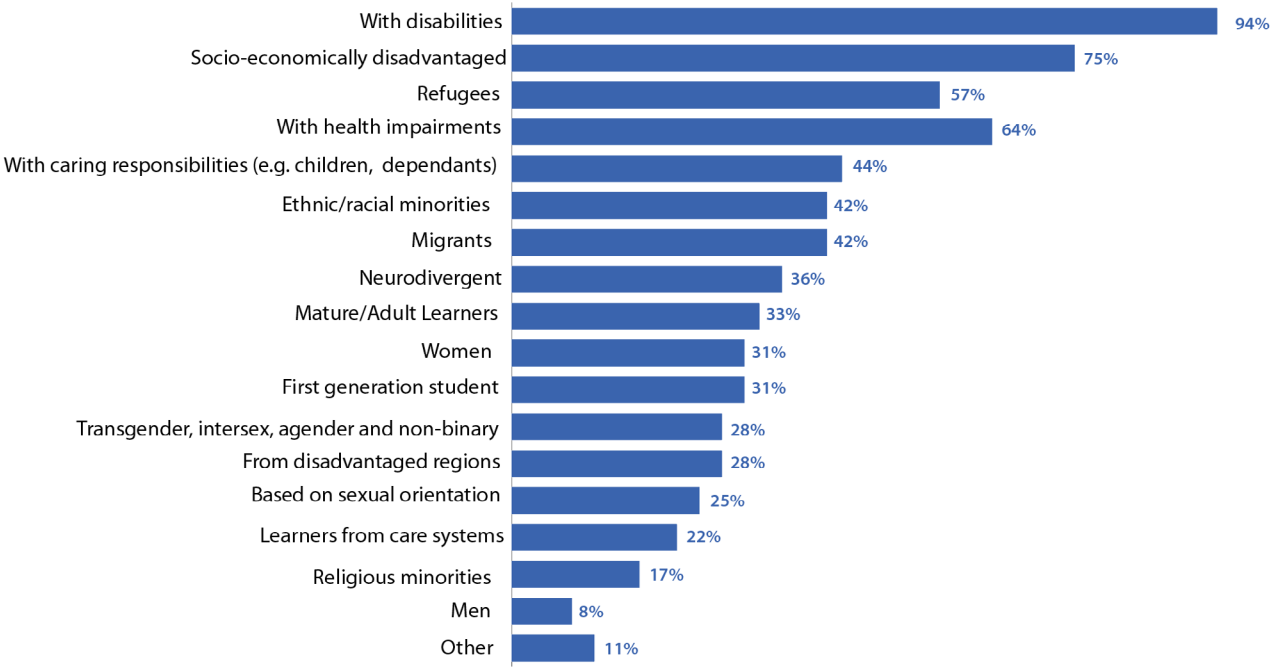
4. Principle IV: Data collection

Principle 4 of the PAGs stipulates that 'reliable data is a necessary precondition for an evidence-based improvement of the social dimension of higher education' and thus, higher education systems should collect certain types of data. Regarding this principle, ESU set out to explore on which student groups data is collected and, how and when this is done.

Generally, monitoring student background characteristics other than age and gender at higher education entry is widespread across the EHEA (BPIR 2024), though there are generally large differences as to who, how and when data is collected. To this end, despite being essential for the systematisation of data collection, only a third of NUSs reported that a top level policy exists in which underrepresented groups in higher education are defined. These differ largely in regards to groups defined (most commonly women, persons with disabilities and persons with migration background are recognised) and some are quite old and thus possibly outdated. This also matches EUROSTUDENT 7 data (Hauschildt et al., 2021), where comparability between countries only ensued in terms of gender, age, students with children, students with impairments and migration background, pointing towards a lack of comparable data regarding other dimensions..

16.7% of NUSs reported that public authorities do not regularly collect data of higher education student characteristics and experience in higher education, though there are differences in regularity and scope between countries. According to NUSs, data is collected most commonly during the course of studies and in at least half of the countries also at entry level and/or upon graduation. Less commonly is data collection after the first year of studies and upon the transition to the labour market. Only four unions (Belarus, France, Lithuania, Sweden) reported that data is collected in regards to all five points in time mentioned above.

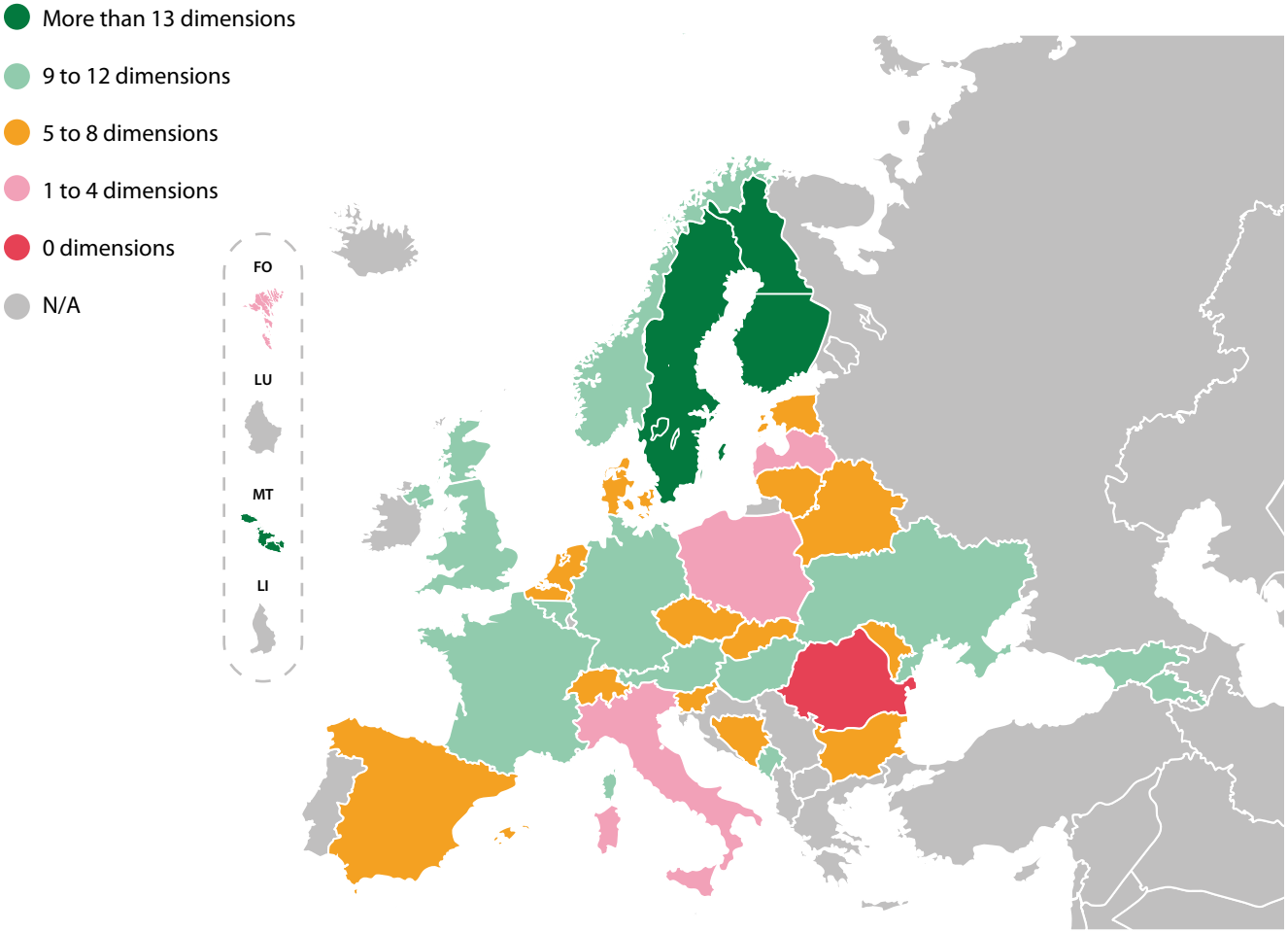
7.9. Groups considered by public authorities as underrepresented, disadvantaged and/or vulnerable groups in higher education



With regards to 16 different categories of vulnerable, disadvantaged and underrepresented groups, disabilities (94%), socio-economic background (75%), refugees (67%) and other health impairments (64%) are most common across countries. In around half of the countries caring responsibilities and ethnic/racial minorities and/or migrants are recognised as well. In around a third of the countries mature/adult learners, women, first generation learners, gender-non conforming learners, learners from disadvantaged regions and sexual orientation are recognised. Less common are the categories of children from care systems (22%), religious minorities (17%) and men (8%). Neurodivergency is recognised either within disabilities/health impairments or as a separate category in at least 36% of

countries. In addition, some unions mentioned that data was collected on language minorities (e.g. Finland) and stateless persons (e.g. Italy, though only with regards to scholarship calls).

7.10. Existence of data collection on underrepresented, disadvantaged and/or vulnerable groups in higher education by public authorities



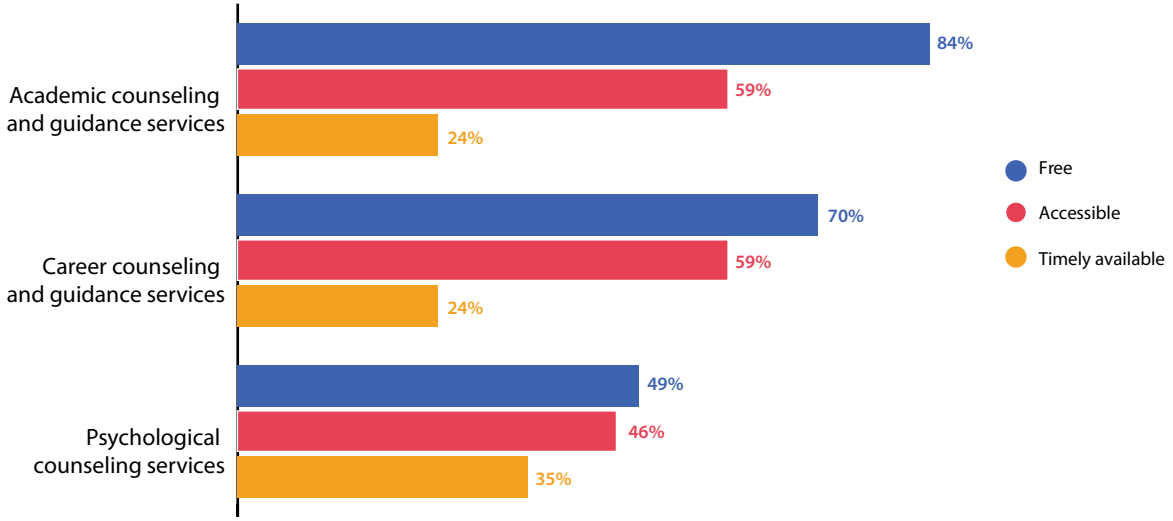
Asked about the data collection on the aforementioned groups, data is collected on 13-16 categories in only 14% of the countries, with Scotland, Sweden, Finland and Malta standing out as to the number of categories. On the other hand, Romania, contrary to the BPIR 2024, stands out as the only country where an NUS reported that no data was collected at all. In some cases it needs to be noted that data collection might not be legally possible, such as in Germany on 'ethnic/race', although this is to be relativised as this data can be collected through alternative methods (as, e.g., done for the German census).

Asked about which groups that are currently not considered as vulnerable, disadvantaged and underrepresented should be added in their national context, many NUSs mentioned as a priority 'LGBTQIA+' (which might either refer to the gender identity and/or sexual orientation), as well as ethnic/racial minorities, students from low socio-economic backgrounds and students with caring responsibilities. A few unions also pointed towards first generation students, religion, students that entered HEIs without HEI entrance qualifications (alternative pathways), neurodivergency (especially due to connected stigmatisation), students studying in rural areas and students abroad, international and refugee/stateless students. The Georgian NUS mentioned a need to consider students from occupied and close-to-border regions as vulnerable, disadvantaged and underrepresented groups, while for Ukraine the need for a category regarding internally displaced students was mentioned.

5. Principle V: Counselling and Guidance

Principle V of the PAGs stipulates that 'public authorities should have policies that enable higher education institutions to ensure effective counselling and guidance for potential and enrolled students in order to widen their access to, participation in and completion of higher education studies. In order to operationalise this principle, ESU took into account three types of counselling: academic counselling, career counselling and psychological counselling.

7.11. Provision of student counselling and guidance services



Notably, NUSs indicated a significant variance in the accessibility of different counselling services. Academic counselling and guidance services, crucial for supporting students in their educational journey, are reported as free by 84% of the unions, while 59% of them considered them accessible, and only 24% reported them to be timely available. While these percentages demonstrate a reasonable level of accessibility, they also signal a room for improvement, especially in ensuring timely availability.

Career counselling and guidance services emerge as being more commonly available, with 70% reporting them as free, 59% as accessible, but only 24% as timely available. As for the academic counselling, the substantial percentage indicating less timely availability raises concerns about the need for more efficient and responsive services, and especially calls on the need for hiring more professional staff that can adequately provide the services.

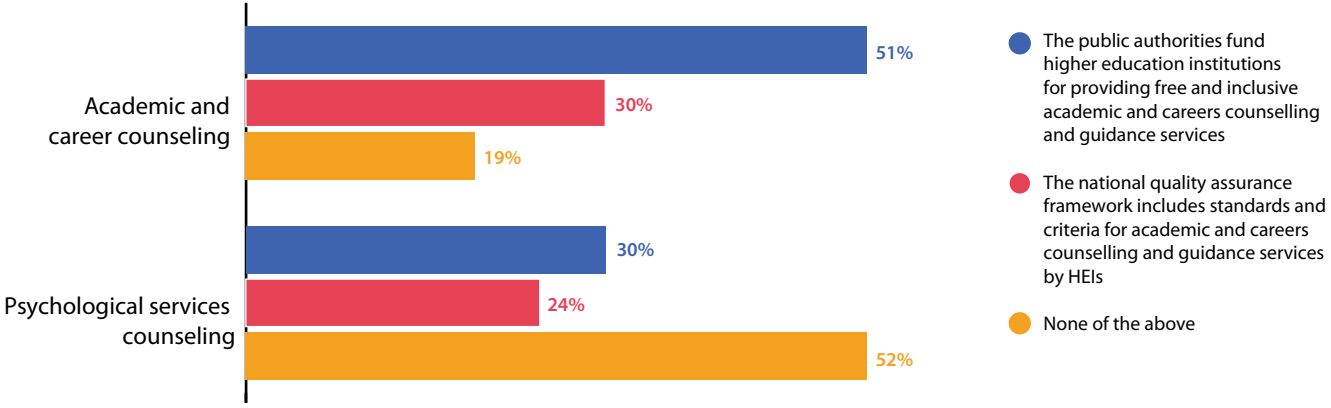
Psychological counselling services, crucial for addressing the holistic well-being of students, present similar accessibility patterns: just 49% of unions reported them to be free, 46% as accessible, and 35% as timely available. These results underscore the importance of further attention to mental health services, with a notable portion of students expressing the need for improved accessibility.

According to the draft Bologna Process Implementation Report (EHEA, 2024), psychological counselling services are legally required in 38 systems, and in 26 systems there is a legal requirement for academic and career guidance services. While BPIR 2024 results appear rather positive, results gathered from NUSs suggest that these legal requirements don't ensure sufficient benefits for students in practice. This discrepancy can possibly be explained by results shown also in the BPIR 2024, where only 10 systems meet all four indicators that were selected to monitor effective guidance and counselling services.

Furthermore, all these counselling services should also be part of regular quality assurance. Unions report that the national quality assurance framework includes standards for academic and career counselling, respectively psychological counselling in around 30% of cases. Robust standards integrated into quality assurance frameworks can serve as a cornerstone for ensuring the consistency, inclusivity, and quality of counselling services.

The financial underpinning of counselling services within higher education institutions is a pivotal aspect of ensuring their efficacy and accessibility. A majority of unions, comprising 51% of higher education systems, mentioned that public authorities fund academic and career counselling services, while only 30% do so for psychological services.

7.12. Public authorities' involvement in counselling services



For the latter, a substantial 56.76% reported relying on sources outside of governmental funding. This divergence highlights a potential challenge in establishing a sustainable financial model for psychological counselling within higher education. The prevalence of 'None of the above' responses (52%) signals an evident gap in funding and quality assurance mechanisms, raising concerns about the accessibility and adequacy of the support services.

6. Principle VI: Sustainable funding, study grants and tuition fees

Principle 6 of the PAGs states that public authorities should ensure that 'higher education fundings systems facilitate the attainment of strategics objectives related to the social dimension' in conjunction with sufficient and sustainable funding being allocated to HEIs, as well as the need for financial support systems that should aim to be universally applicable to all students, but at least to be needs-based and enabling all students to access and progress through higher education successfully.

In the European tradition education is considered as a public good, which is reflected in the 2007 Ministerial Communiqué. As a public good qua definition is a commodity for the benefit of the entire society and thus should be accessible to all, the question of study grants (both universal and needs-based systems) connects directly with the issue of the responsibility of both public authorities and higher education institutions regarding the accessibility of higher education for students and intersects with the idea of the freedom to learn. To this end, social dimension policy and especially tuition fees and study grants intersect with aspects of the fundamental values of the EHEA, which should be kept in mind when discussing principles six of the PAGs.

Funding mechanisms to facilitate social policy

Given the strong emphasis on institutional autonomy in many European higher education systems, different mechanisms applied to funding schemes are in some cases the only and in other cases one of the most impactful ways to strategically facilitate that HEIs implement policies regarding social policy objectives.

Asked about how different funding mechanisms are used by public authorities to facilitate the widening of access, increase of participation and completion in HEIs, more than half of the unions reported that core funding and additional funds through project applications are used in their HE system to this end. Furthermore a third of the unions pointed towards additional funds based on institutional strategies. At the same time, 22% of unions reported there was no obligation to use public funds on social policy, with most of the countries in question being eastern European countries. Even though these numbers might appear to signal a somewhat positive situation, it has to be set into relation with the widespread underfinancing of higher education in Europe. Questionable is also to what extent core funding and additional funds are tied to social policy objectives, as usually only few groups are targeted and/or questionable indicators are used, such as completion rates. To this end, the funding dimension in support of widening access, increasing participation or completing higher education is one of the most neglected aspects of the PAGs in the EHEA.

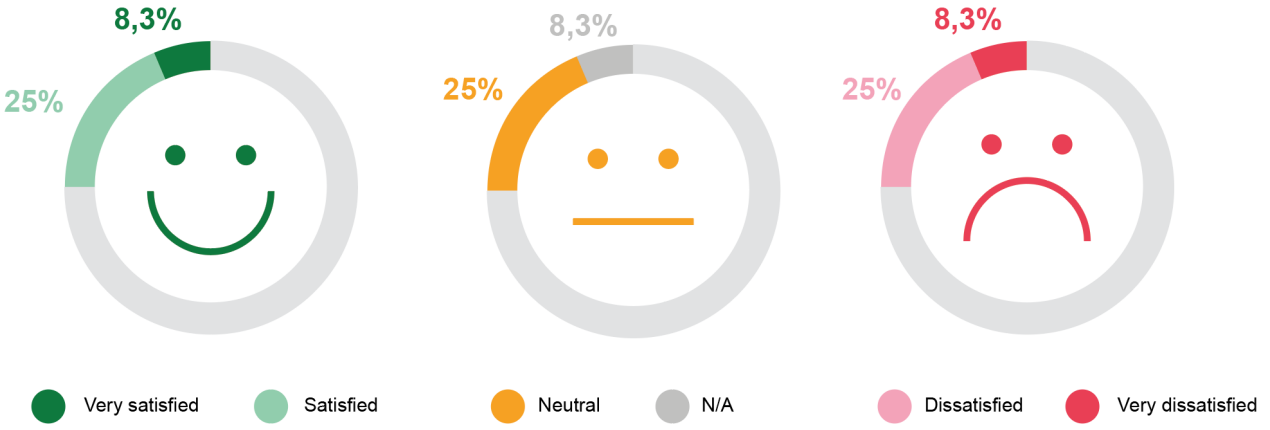
Study grants

Generally speaking, 36% of NUSs reported that in the last couple of years the total allocated public funding for study grants increased, while 33% of NUSs reported no changes and 8% even a decrease (23% 'i don't know').

Only three unions (Czech Republic, Denmark and Finland Universities) reported that the grant system reached all students in need for financial support, even though 53% of the NUSs reported that there have been slight or significant increases on the total number of receivers in recent years (opposed to 11% reporting a decrease). Additionally, a third of unions report that in recent years the eligibility criteria for study grants has been reformed to become more permissive, while 63.9% reported no changes in the eligibility criteria. These figures complement the data from the 2024 BPIR, according to which need-based grants are far more widespread than universal grants, with the need-based grants reaching in most systems not more than 30% of the student population. This supports student unions assessments that the grants are not reaching all students in need, bearing in mind that young people generally are an at-risk group for poverty and some studies (UWN, 2022) revealing that even in richer European countries an alarming share of students live below national poverty lines.

Regarding the sufficiency of the amount that is paid to study grant receivers, 53% of the NUSs reported little or significant increase in the amount of the grants in recent years, while only a third of the unions reported that grants were indexed according to the inflation. Very positive is that in none of the countries grants were decreased, though 8% of NUSs report that there are discussions on it (Denmark, Wallonia, Finland VET). As to whether the support is sufficient to cover all indirect costs, no union reported this to be true, with only the Bulgarian, Danish, Finnish (VET) and Flemish unions reporting that at least most of the costs were covered by the financial support available to those students in need. This assessment is supported by Eurostudent 7, which revealed that 79% of student income are generated through employment, support from families or other private sources, while public sources only account for a tenth (Eurostudent, 2021 p. 177), with self-earned income being the most important source in two thirds of countries (ibid., p.178) and 70% of students being dependent on support from family/partners/others (ibid., p. 179).

7.13. Satisfaction with eligibility criteria of study grants

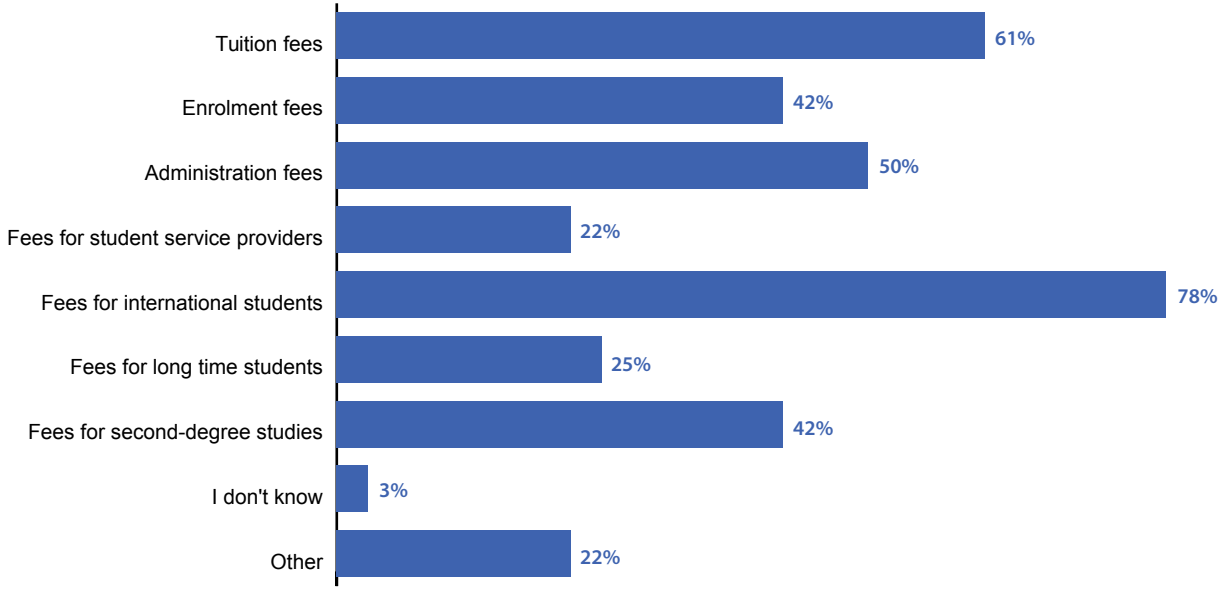


With regard to the satisfaction level of NUSs with prevalent grant systems, regarding the eligibility criteria, a third of the unions are satisfied, opposed to a third being dissatisfied with the criteria. In addition, needs-based systems are criticised with regard to aspects such as underlying income criteria and other restrictive criteria as well as the loans resulting in debts putting already disadvantaged persons at an even greater disadvantage and connected administrative hurdles due to the paperwork required and the lack of (re-)assessing the criteria (Belgium, Switzerland, Germany, UK). Furthermore, in many countries the total amount of support students receive does not reflect their actual needs, which negatively affects students due to the need for employment in addition to their full time studies. In some cases grant systems depend on local government (Switzerland), making them unequal. In Italy, grants are based on merit, making them not accessible to all. In some countries the systems do not account for family problems (e.g., estranged parents or parents unwilling to pay child support), such as the German BAföG where in these cases students are forced to sue their parents in order to be able to access the study loan or in Estonia, where students under the age of 24 cannot access the study grants as they are considered to be supported by their parents. On a very positive note it is to be highlighted that the Netherlands reformed their

system by switching from a loan system to a grant system, thus preventing students in need for financial support from acquiring debts[2].

Tuition fees

7.14. Existence of different types of study related fees



[2] As a side note, even though the PAGs refer to universal grants, the Romanian student union ANOSR pointed out that in addition to the already existing grant system, a loan system was introduced recently though it only covers a very small percentage of the total student population. Furthermore, NUSes in systems where financial support systems are partially loan-based and/or (other) loan systems exist, reported study loans did not only result in debts for already vulnerable and disadvantaged student groups but also often have additionally high interest rates such as in Iceland, Lithuania or the KfW-loan in Germany.

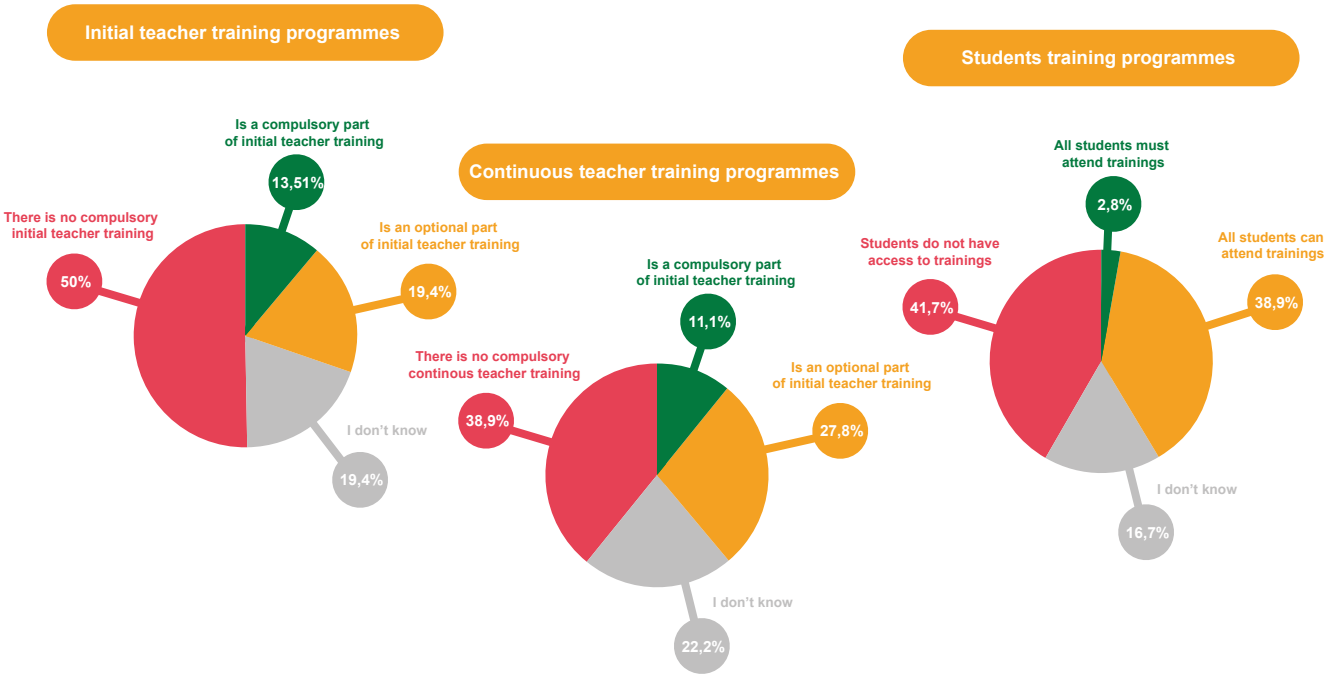
ESU believes education should be free, as fees can further inequity regarding the accessibility of and successful progression in higher education, impacting students from vulnerable, disadvantaged and underrepresented groups strongly (especially, if there are no or only insufficient measures in place to mitigate direct and indirect costs of studying). To this end, ESU inquired NUSs about the existence of seven specific types of fees (for tuition, enrollment, administration, student service providers, international students, long-time students, second-degree studies, as well as 'other'). In all higher education systems at least one form of fee is prevalent. In 78% of the countries international students have to pay tuition fees, followed by general tuition (61%). In addition, administrative, enrollment and fees for second-degree studies are common in around half of the countries. Regarding 'other' forms of fees, some countries have fees for studying in foreign language study programmes (Czech Republic, Estonia), public transportation (parts of Germany due to special price reduced contracts with providers), part-time studies (Estonia, Poland), student health services (Finland) and contribution to the student and campus life (France). In Italy all surveyed fee types exist and are part of the so-called 'right of study' fee.

Interestingly, asked about whether NUSs believe that the currently existing fees in their corresponding higher education system have an impact on the access to education for domestic students (in case of EU/EEA countries, non third-country students), 59% of the unions believe the fees impact access to higher education negatively, while 38% don't believe there is much (35%) or even no (3%) impact in terms of access, with an additional 3% pointing towards no impact as vulnerable, disadvantaged and underrepresented students are exempted from fees. This might be explained by considering that student unions, particularly those from Southern and Eastern Europe, perceive the current fees, which are relatively low and administrative in nature, as not posing as significant a barrier to accessing higher education as other factors such as indirect costs.

7. Principle VII: Staff training and institutional mission

In regards to the diversification of student and staff bodies in recent decades, Principle 7 of the PAGs stipulates that public authorities should enable HEIs to strengthen their capacities in response to this, including through the creation of inclusive learning environments and institutional cultures, including via adequate training on diversity, equity and inclusion.

7.15. Existence of top level provisions for initial and continuous teacher and student training, training on diversity, equity and inclusion in education



ESU therefore inquired with NUSes whether initial teacher training programmes, continuous teacher training programmes and training programmes for students focusing on diversity, equity and inclusion have been implemented in their respective higher education systems.

Only 13.51% of NUSes reported that initial teacher training programmes were compulsory, with an even lesser 11.1% reporting continuous teacher training programmes as compulsory. Notwithstanding the fifth of NUSes that opted to answer 'I don't know', these figures point towards a broad non-implementation of this principle and a massive lack in ensuring that higher education staff is educated on and prepared for the engagement of a diverse student population.

Moreover, in regards to ensuring that students receive adequate training on diversity, equity and inclusion, only the Georgian student union GSOA reported mandatory training for students. Given that self-development is an integral part of higher education and that HEIs should foster competences for democratic culture encompassing values, attitudes, skills and knowledge and critical thinking (Council of Europe, 2020), both in regards to their own staff but also to prepare learners for life, the figures on principle 7 show a strong need to revise how to implement training programmes systematically across higher education.

In relation to whether higher education institutions' buildings and other infrastructure (e.g. accommodation, libraries) are accessible for persons with disabilities, unions report that in 10% all HEI buildings are accessible, in 45% most buildings are accessible and in 45% only some buildings are usually accessible for students with disabilities. Furthermore, public authorities are involved in making their infrastructure more accessible in 64.8% of cases. Among those, in 12 higher education systems this is done through legislation, in 4 systems through funding for HEIs and in 8 systems through guidance. In only one country (France) all three types of involvement are present.

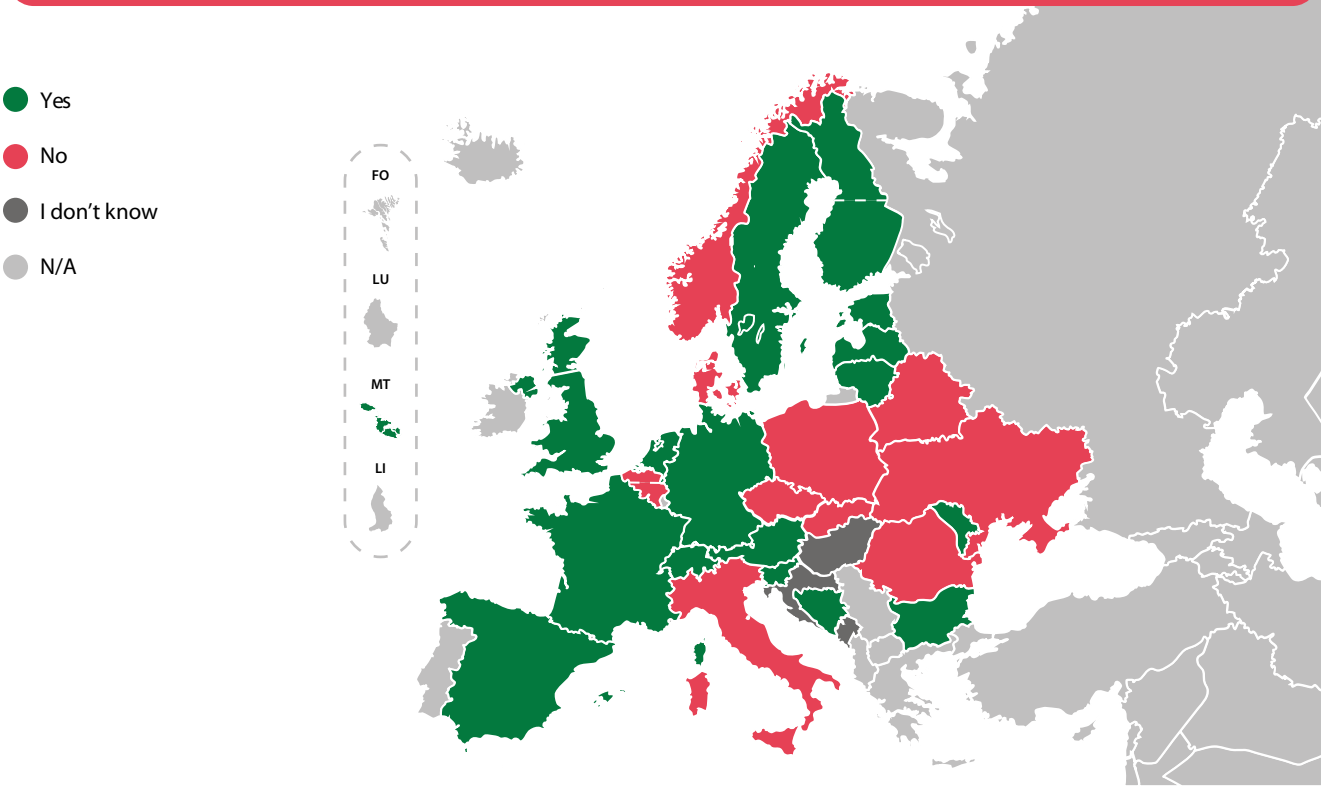
When looking into examples offered by unions into how student needs are accommodated in campus, most point to adaptations for exams and schedule of classes or lectures, but also different facilities: study rooms, libraries, recreational spaces. A good example is present in Austria, where the ministry includes aspects related to social dimension and student environment in the financial contract with each HEI. However, the Austrian union also points out that the achievement of the goals within the contract is improperly monitored. In Germany, fzs mentions that 'under certain circumstances, students can apply for disadvantage compensation such as more time for exams, different examination forms, extensions of maximum study periods and so on. These however only apply for concrete disadvantages of a student, not general disadvantages'. NUS Scotland mentions that 'usually any reasonable adjustments can and must be met', while NUS UK refers to regulations for newly built buildings concerning physical access needs. Finally, KSU also mentions that 'accessibility, assessment and infrastructural aids are in place'.

8. Principle VIII: Mobility

Principle 8 of the PAGs stipulates that international mobility programs should be structured and implemented in a way that foster diversity, equity and inclusion and should particularly foster participation of students and staff from vulnerable, disadvantaged or underrepresented backgrounds.

Outgoing mobility

7.16. Support for outgoing international mobility of underrepresented, disadvantaged and vulnerable student groups by public authorities



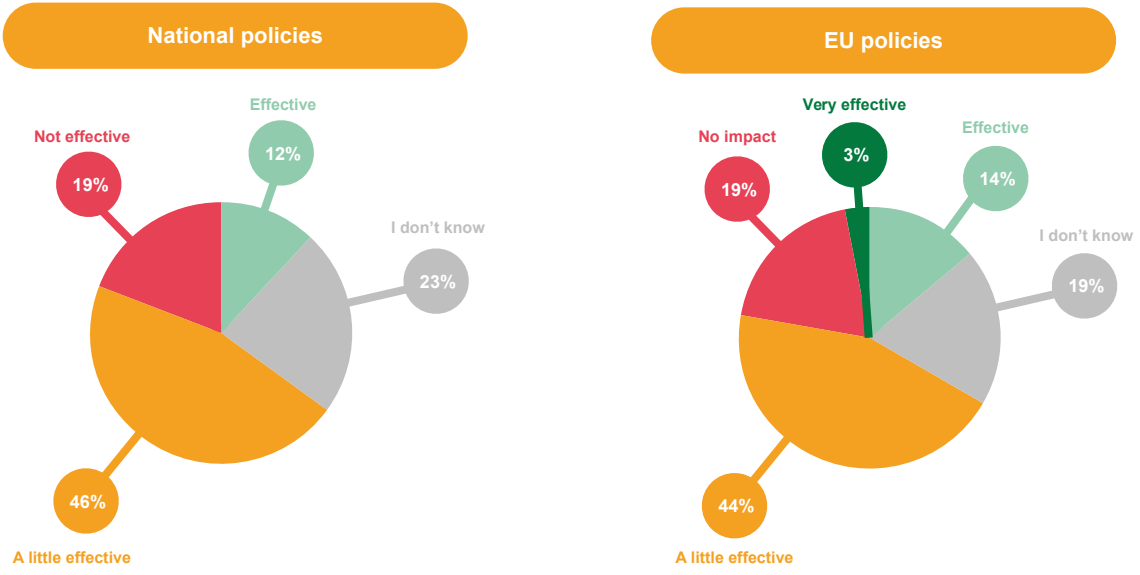
To this end, ESU asked NUSs about support provided by top level authorities for outgoing international mobility of vulnerable, disadvantaged and underrepresented student groups. Only around half of the NUSs reported the existence of targeted support. This form of targeted support appears to be less common in central, eastern and at least some northern European countries. The BPIR 2024 supports that many central and eastern European countries do not have targeted mobility measures in place, as well as several nordic countries. Furthermore, there also seems to be a discrepancy between NUSs vis-a-vis ministries, as several NUSs where ministries reported the existence of targeted measures reported the contrary. Given that according to EUROSTUDENT 7 (Hauschildt et al., 2021 p.255) and a recent study by ESU with ESN (ESU and ESN, 2023) financial burdens are the most cited obstacle to temporary enrolment abroad, the discrepancy between NUSs and ministries might point towards unions assessing existing financial support as insufficient and thus as not to be considered with view to the principle. To this end it is to be highlighted that some national agencies are confronted with a choice whether to increase Erasmus+ grants through top-ups while decreasing the number of students supported, or to fund more students but with lower grants, which surely has an impact also on the support for vulnerable, disadvantages and underrepresented student groups. Problematic is also that national level support for mobility for disadvantaged student groups differs largely between countries, creating imbalances between countries. For the UK it is to be highlighted that the country not only left Erasmus+ but also doesn't seem to provide targeted support, while opposing this Scotland makes its own efforts to support student mobility including targeted support for vulnerable student groups.

Most commonly, according to NUSs, earmarked funding is provided though only four unions reported it to include all relevant student groups. Furthermore, data collection and concrete mobility targets exist as measures in around a third of the countries that provide targeted support. Action plans were only reported by two unions to exist. Overall, 69% of unions reported that there are policies in place to increase the participation of vulnerable, disadvantaged and underrepresented student groups, though only 8% of these unions assessed those policies to be somewhat effective.

Incoming mobility

Incoming mobility is, unfortunately, not covered by the Bologna Process Implementation Report, but important to be looked after as for many vulnerable, disadvantaged and underrepresented student groups mobility is only possible if there is sufficient support in the potential host country in place. Especially in connection to HEIs as providers, according to NUSs, in around a third of the countries, guidance and mentoring services, subsidies, accommodation and/or targeted grants are implemented. Furthermore, 15% of countries' HEIs provide training for teaching and administrative staff on how to support students and/or subsidised meals. The Faroe Islands and Latvia stick out as unions report that there are no measures in place to support students from vulnerable, disadvantaged or underrepresented groups. In Italy support depends on individual professors and staff supporting students. For Norway the existence of grants within a universal system was highlighted.

7.17. Effectiveness of national and EU policies on increasing the participation of underrepresented, disadvantaged and vulnerable groups in incoming international mobility



With 28% of NUSs reporting no policies to exist on national level with the target to increase the participation of vulnerable, disadvantaged and underrepresented incoming students, 12% of unions reporting the existence of policies assessed them to be somewhat effective and 65% assessing them to have little to no effectiveness. Compared to national level policies, EU level policies are rated overall only as more effective, with 17% assessing them as somewhat or very effective, while 64% rate them to have little to no effectiveness.

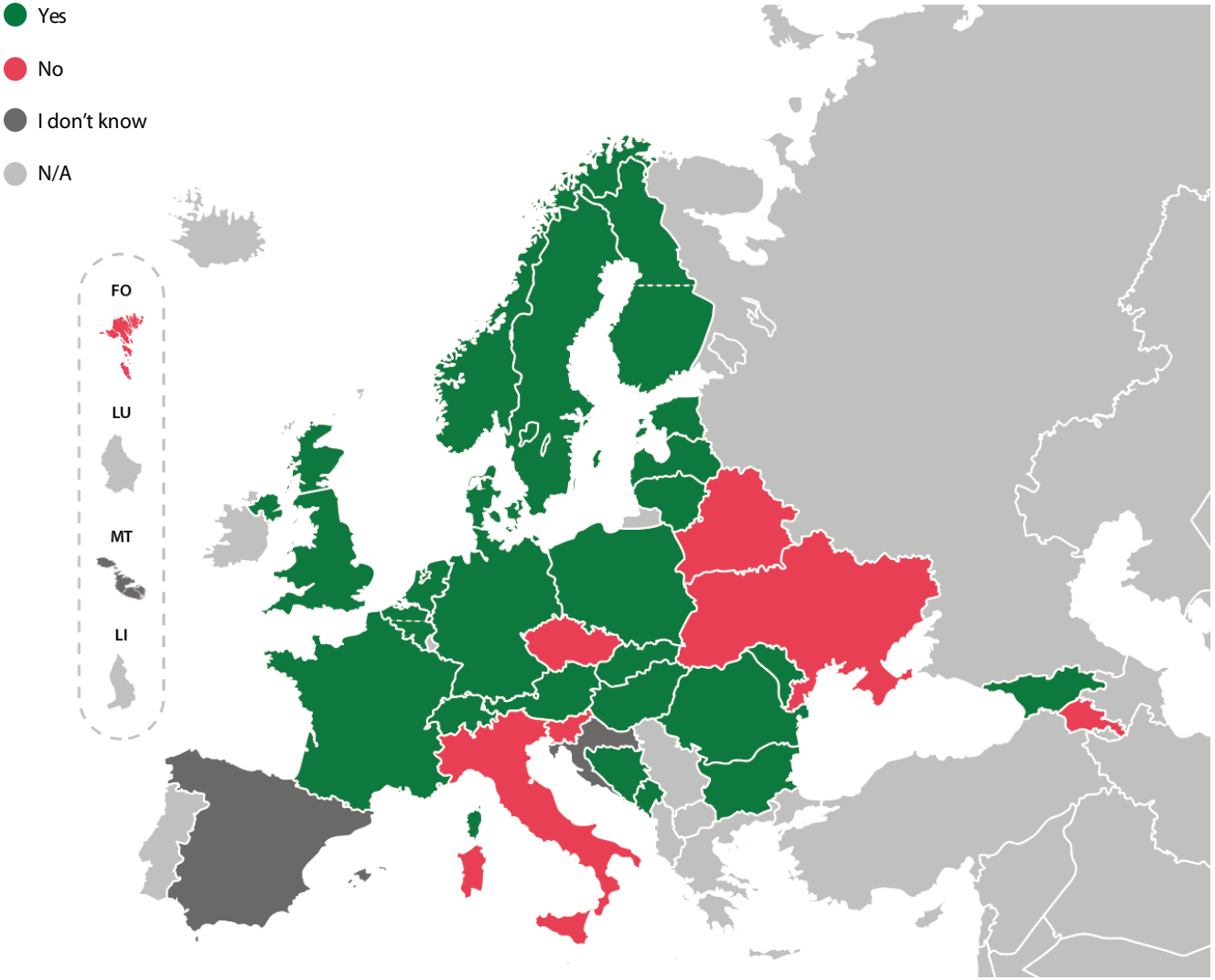
Notably, both in regard to outgoing and incoming mobility, projects like the Inclusive Mobility website (inclusivemobility.eu, n.d.) are useful to provide students with necessary information on the accessibility of other systems and HEIs. Overall, as the study by ESU with ESN (2023) shows, actions regarding incoming mobility usually are undertaken by HEIs and local student unions. The study also highlighted that issues regarding higher tuition fees for third-country nationals, health insurance, work permits and access to grants affect incoming students largely. To this end, in order to support disadvantaged student groups and prevent precarity, the most important measure hosting countries could implement is to treat them equally to other students in the country.

9. Principle X: Social/policy dialogue

Principle 10 of the PAGs stipulates that public authorities should engage in a policy dialogue with higher education institutions and other relevant stakeholders.

As also shown by the Bologna Process Implementation Report, according to which more than half of the EHEA countries have not established a national policy dialogue, systematic social dialogue is lacking in most countries. Nevertheless, it can be positively highlighted that in terms of social policy 68% NUSs reported being involved by public authorities in some form or the other even though there are country-related differences as to the different phases of the policy cycle. At the same time it is noteworthy given the longstanding commitment reiterated in several Ministerial Communiqués of the EHEA that 24% of NUSs reported no involvement in any stage of the policy cycle on top level.

7.18. Involvement of NUSes in the policy cycle regarding social dimension policy on top levels



Involvement occurs most often during the policy formulation phase (49%) and sometimes also during monitoring/evaluation phase (32%) as well as more rarely through a role during the adoption process of policies (24%). Only five unions report that they are involved through all stages of the policy cycle (Finland-HEI, France, Scotland, Netherlands, Sweden). Lastly, public authorities rarely survey the satisfaction of NUSs regarding their involvement.

As to whether consultations with top level public authorities lead to tangible changes in social dimension policy, only 41% unions reported legal changes, with a further 27% reporting recommendations and 16% reporting that consultations did not lead to any changes at all.

Given the democratic backsliding in Europe, parallel by an increase of attacks on academia as well as the fundamental values underpinning the Bologna process, the current situation on social dialogue paints not only a picture of neglect, but also should be noted as a threat to both academia and society. On the one hand, this is connected to a lack of democratisation of higher education, which in turn stands in contrast to the idea of fostering active citizenship and democratic competences. On the other side, this leads to the inclusion of the student voice from decision making, resulting possibly in decisions and actions that run contrary to student wishes and/or needs, thus alienating students both politically as well as in regards to their sense of belonging in higher education. Therefore, it is advisable to implement social dialogue systematically, in order to strengthen the legitimacy of decision making as well as of democratic academia as such.

10. The effects of the energy and cost-of-living crises on student poverty and higher education institutions

It's imperative to recognize the evidence from many countries that young people who grow up in poverty are one of the most vulnerable groups, with poverty-affected youth being statistically more likely to be in poor health, to be disadvantaged in their educational development leading to underachievements in education and having lower skills and aspirations, as well as being dependent on low-income jobs and welfare (Council of Europe, n.d.). In the EU as of 2022, young adults aged 18-24 years are more likely to be at risk of poverty or social exclusion than other societal

groups (Eurostat, 2023). It is noteworthy that despite the Europe 2020 strategy with the target of fighting against poverty and social exclusion by lowering the amount of people living under national poverty lines by at least 25%, this target has not been achieved and therefore the Commission introduced a new target within for 2030 within the European Pillar of Social Rights action plan (European Parliament, n.d.). Recent crises, including COVID-19, the war in Ukraine, and inflation, have further compounded the issue of student poverty across the entire European continent. To raise awareness of the European Students' Union launched in 2022 the 'Education is Freezing' campaign, analysing student poverty in Europe and providing recommendations for both European and national-level authorities and stakeholders (ESU, 2022).

To this end, ESU surveyed NUSes to assess efforts of top-level authorities in addressing student poverty since 2020. 36% of NUSes reported no action taken by their governments, 22% cited the implementation of general measures not specifically aimed at students, and 39% reported affirmative actions were taken. Measures primarily resulted in order to address the impacts of the COVID-19 pandemic (46% of countries) and/or the rising cost of living in connection to the ongoing inflation (51%). In addition, 37% of countries implemented measures in direct response to the energy crisis in 2022. In 54% of countries the introduction and/or adaptation of grant systems are used as a mechanism to combat student poverty, followed by direct cash transfers in response to the prevailing crises (29%) and other financial measures such as rent support and/or price ceilings for energy prices (29%).

Regardless, a significant proportion of NUSes expressed dissatisfaction with the measures taken by top-level public authorities (dissatisfaction levels at 62%) and HEIs (dissatisfaction-levels at 46%). The reasons for this range from dissatisfaction due to a lack of measures, to measures being insufficient and/or measures not being accurate to the root of the problems.

Furthermore, ESU observed the financial strain on higher education institutions following the surge in energy prices since 2022. NUSes indicated that many HEIs were struggling to pay energy bills, leading to threats of closure during the winter months to reduce costs. This situation, compounded by the shift to online classes during lockdowns, contributed to increased mental health issues and

stress among students (Azmi et al., 2022). An inquiry of whether public authorities provided support during the energy and inflation crisis, only half of the NUSes reported that support either through direct financial assistance or indirect forms of support (such as protected consumer status or price caps) had been implemented.

IV. Key takeaways and policy recommendations

Concluding, contrary to the various commitments made by Ministers, the EHEA is currently still far away from having implemented the PAGs and as such, the EHEA cannot be deemed to be socially inclusive. This is especially worrisome, as the effects of the pandemic and the cost-of-living crisis of recent years have broadened social inequalities and especially also inequity in (higher) education, with many students living under precarious and poverty-marked conditions, often financially dependent on family members and self-employment.

In order to ensure that students from vulnerable, disadvantaged and underrepresented groups have equitable access to and progression within higher education, four recommendations can be derived. Firstly, all higher education systems should implement **strategies** encompassing accurate definitions, targets and concrete measures to support students, as well as the implementation of legal requirements and financial incentives for HEIs. Secondly, **student unions and representatives** as well as other relevant stakeholders should be **meaningfully engaged** in all phases of the development of such policies. Thirdly, meaningful policy and **social dialogue** needs to be structurally anchored and systematically enshrined on all levels of the higher education system. And, fourthly, **universal grants** and easened access to other forms of support need to be implemented.

For the EHEA level, it is critical that momentum is kept for implementing the PAGS consistently and no watering down of commitments is allowed, otherwise the document would turn into a paper tiger. While ESU is enthusiastic about the adoption of the Indicators and Descriptors, it needs to be noted that scope and content have been significantly watered down. It is essential to point out that while the indicators would serve as a guidance, there should be proof of meaningful achievement of the Principles through other means if they are not taken into account. EHEA should continue to

work on social dimension, especially on data collection, impact assessment and embedding social dimension in the practices and policies of EHEA.

To this end, ESU recommends in regards to the different principles underpinning the social dimension in higher education:

Principle 1: Strategies

- Establishment of national/top-level strategies in collaboration and regular (re-)evaluation of the strategies and targets collaboratively with all stakeholder groups; targets and measures should actually foster access and inclusion, not prevent it
- HEIs need to be provided with the necessary resources to be able to reach the strategies
- Legal requirements and financial incentives for HEIs to implement the strategies

Principle 2: Flexibility & RPL

- Allowing for the provision of blended, online and distance-learning programmes and ensure a framework for their quality
- Ensuring accessibility of student benefits and support measures for part-time students
- Allowing within the legislation and support flexibility within the study programmes, enabling student-centred learning, including through funding
- Recognising RPL as a student right and include RPL in the national QA frameworks
- Making better use of and, if necessary, adjust NQFs to cater for non-formal and informal learning and support RPL
- Regulating the use of RPL for all study programmes, encompassing all purposes (access to higher education, progress between cycles and within a study programme) and removing undue barriers
- Offering methodological guidance and top-level coordination on RPL, including on the use of learning outcomes
- Support for training for staff on how to apply RPL and guidance for students
- Including student activism and volunteerism as a specific component of RPL

Principle 3: Synergies and lifelong learning

- Establishment of national/top-level systematic and structural coordination (groups) including all relevant stakeholders from the academic community and on political level
- Strategic implementation of the whole-school approach

Principle 4: Data collection

- Defining vulnerable, disadvantaged and underrepresented student groups & regular further development of the systematisation
- Establishment of national/top-level supported higher education research institutions to support data collection (similar to Eurostudent)
- Regular data collection at the before, at the beginning, during and after studies
- Setting of minimum standards for data collection across the EHEA

Principle 5: Counselling and Guidance

- HEIs should prioritise improving the accessibility and timeliness of counselling services by expanding resources, streamlining processes and implementing mechanisms for prompt response to students' needs
- Adequate funding should be allocated to HEIs specifically for the provision of free and inclusive counselling services
- Standards and criteria for counselling services should be explicitly incorporated into quality assurance frameworks to ensure that benchmarks for consistency, inclusivity and quality are met
- Efforts should be made to align institutional practices with legal mandates, ensuring that students receive the intended support outlined in regulations
- Counselling services should be actively monitored and evaluated to ensure compliance with standards and effectiveness in meeting students' needs

- A coordinated approach between stakeholders, including public authorities, HEIs, quality assurance agencies and students ensures alignment of policies, allocation of resources and ongoing support for students' well-being

Principle 6: Sustainable funding, study grants and tuition fees

- Providing sustainable funding to HEIs to reach the PAGs targets
- Implementing funding mechanisms that incentivise HEIs to further accessibility and diversity
- Introduction of universal study grants
- In case of negative inflation and/or rising costs of living, regular raises and/or indexation of grants
- Calculation of grants based on real direct and indirect costs of living
- In case of needs-based grants: extension of eligibility criteria to embrace all students in need, simplification of application and calculation processes (de-bureaucratisation)
- Regular revision of the grant system collaboratively with student unions
- Abolition of all forms of tuition fees
- In case of the existence of fees: regular revision of the impact of the different forms of fees on students social situation, hardship regulations, measures to counteract negative impact on vulnerable, disadvantaged and underrepresented student groups

Principle 7: Staff training and institutional mission

- Providing funding for HEIs to ensure initial and continuous teacher training programmes and training programmes for students focusing on diversity, equity and inclusion
- Supporting investment plans, including through EU funding, to ensure that campus infrastructure is accessible for disabled individuals and follows the principles of universal design
- Supporting information provision on the accessibility of campuses

Principle 8: Mobility

- Implementation of strategies encompassing outgoing and incoming mobility regarding the support for vulnerable, disadvantaged and underrepresented student groups, including targeted mobility measures
- Sufficient financial support matching actual costs of mobility
- Accession of Erasmus+ in cases where HE systems are not part of the program
- Providing sufficient funding and incentives for HEIs to support mobility services for incoming and outgoing students, especially in terms of support services, accommodation, mentoring and other relevant services

Principle 10: Social/policy dialogue

- Establishment of systematic social dialogue, backed by structures and other measures to increase exchange and collaboration between all stakeholders and all relevant public authorities
- Implementation of meaningful participation of student unions and representatives during all phases of the policy cycle on national/top-levels
- Legal requirements for HEIs to engage local student unions and representatives during all phases of the policy cycle

Student poverty

- Promote a Council recommendation on student support services for the well-being in Higher Education, establishing minimum standards for the investments in student grants, healthcare, mental health support, housing, transport, and other services, in line with the values of the European Pillar of Social Rights, and guiding the Member States to adopt measures to enhance students' well-being within higher education through strategies and concrete actions.
- Removal of age limitations for students to benefit from support services, financial assistance and other aids, regarding both support measures implemented in response to the multiple crises and universal support systems.

- Creating national action plans, in consultation with the student unions, to tackle student poverty regarding both the current inflation crisis and as a structural phenomenon.

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Quality assurance

I. Introduction

Quality assurance (QA) has been an integral feature of the Bologna Process and one of the most successful drivers for change in higher education. In 2015, the ministers of higher education placed a strong emphasis on the notion that 'enhancing the quality and relevance of learning and teaching is the main mission of the EHEA'. Subsequently, in 2018, they designated quality assurance as one of the key commitments of the Bologna Process, crucial for achieving the EHEA purposes of comparability, compatibility and transparency to ensure mobility and the competitiveness of European higher education systems.

In the following sections, after presenting the Bologna commitments in QA, we will look in closer detail at the following elements:

- Fit-for-purpose quality assurance systems, based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)
- The support for the European Approach for the Quality Assurance of Joint Programmes
- Student participation in quality assurance (in internal QA, external QA and the QA of agencies)
- Openness to cross-border QA and the role of the European Quality Assurance Register for Higher Education (EQAR).

ESU recently conducted a separate analysis on the implementation of the ESG and students' perceptions of the future of QA in the EHEA, and more specifically, the future of the ESG, as part of the QA-FIT project (ESU, 2023). To avoid duplication, data from the aforementioned publication is quoted where relevant.

II. Bologna commitments

At the inception of the Bologna Process, quality assurance systems emerged in most European countries, with various, sometimes diverging practices unfolding.

Quality assurance has become a hallmark of European cooperation in higher education through the Bologna Process. In 1999, the ministers of the Bologna Process committed to promoting European cooperation in quality assurance to develop comparable criteria and methodologies. The objective of these comparable criteria and methodologies was multifold: increase the basic comparability of higher education systems and trust in the quality of each others' systems to promote mobility, as well as to improve the attractiveness of European higher education systems and the degree to which they served the missions of higher education. This has been underlined in the 2001 Ministerial Communique, emphasising that 'quality is the basic underlying condition for trust'.

Quality assurance served as a valuable and efficient transmission channel for EHEA policies. Through shared criteria, the implementation of policy measures was incentivised directly towards the institutional level, leading to a more successful implementation of EHEA priorities.

The main principles of the European QA model, including the participation of students, were adopted as principles by ministers in 2003, followed by the adoption of the Standards and Guidelines for Quality Assurance in the EHEA (ESG) in 2005, proposed by the E4 group (ENQA, ESU, EUA, EURASHE). The adoption of the ESG has been a game-changer for quality assurance in EHEA, as it provides a common language, a common reference, and a set of minimum criteria for conducting QA. While not limiting additional national criteria, the ESG has been designed to be reasonably generic to ensure that they are applicable to all forms of provision and to the diversity of the EHEA while supporting mutual trust, thus facilitating recognition and mobility across countries.

The adoption of the ESG was followed in 2008 by the creation of the European Quality Assurance Register for Higher Education (EQAR), which maintains a list of external QA agencies that operate in substantial compliance with the ESG. The creation of such a register enabled ministers in 2012 to commit to 'allowing EQAR-registered agencies to perform their activities across the EHEA, whilst also complying with national requirements'. Opening the higher education system to QA agencies beyond national borders implied not only had an appropriate level of compatibility been achieved but it was also intended to provide additional opportunities for higher education institutions to select suitable QA agencies that offered novel approaches to QA and support internationalisation.

In 2015, the ministers adopted a revised version of the ESG, clarifying its provisions and expanding its coverage of indicators, notably for students, by explicitly including student-centred learning as one of the criteria in internal QA. Furthermore, in order to ease the quality assurance component of establishing Joint Programmes, the ministers also adopted the European Approach for the Quality Assurance of Joint Programmes, as a set of common criteria that can be used in a procedure for evaluating Joint Programmes that should be recognised as sufficient in all countries of the higher education institutions involved.

In recent years, the focus of the EHEA seems to have settled on implementing already existing commitments, noting an existing gap in the achievement of a common QA framework for quality assurance.,

The 2018 and 2020 Ministerial Communiques took into account developments in digitalisation. The ministers have further committed to the use of digital tools in QA, the QA of digital education and the further development of the Database of External Quality Assurance Results (DEQAR) to facilitate automatic recognition.

In 2020, as a result of increasing transnational provision, ministers also committed to 'ensuring that our external quality assurance arrangements cover transnational higher education in the EHEA with equal standards as for domestic provision'. They also explicitly called for the application of ESG for microcredentials through an enhancement-oriented use of ESG.

III. Analysis of Bologna commitments implementation

ESU believes that the EHEA's work on QA has been one of the most successful policy areas, producing meaningful change in learning and teaching policies, especially in promoting student-centred learning. In countries with a weaker culture of student participation, the European principles of student participation in QA accommodated other higher education stakeholders with students' presence in decision-making through a ricochet effect. It also established a different conceptualisation of students as i) political agents (students' unions, student representatives)

and ii) experts of their learning (student experts in QA but also the whole student community's engagement in QA). However, the implementation of QA commitments did not happen without pitfalls or half-implemented measures.

III.1 General question about the types of external quality assurance reviews

Quality assurance policy-makers and stakeholders have long debated which types of external quality assurance activities are best fitted to achieve the purposes of a QA system. While external quality assurance reviews can take several forms, the most prominent national approaches are institutional reviews (audits/evaluations/accreditations/certifications etc), programme reviews or a combination of them (mixed system).

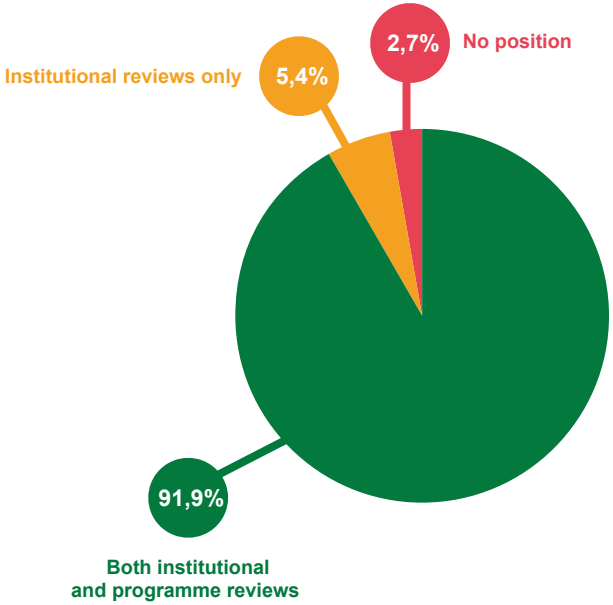
Due to distinct national contexts, historical reasons, practices or stages of development of the external and internal quality assurance system, countries have taken diverse approaches in deciding whether to use institutional or programme-level reviews or both. To accommodate all types of approaches, the ESG does not mandate any specific type of external QA activities. The ESG is equally applicable to all, and it is expected that the system, as a whole, will be fit for purpose.
However, more recently, there have been emerging calls, especially from the European Union institutions (the European Commission and the Council), to move exclusively towards institutional-based reviews. This can be evidenced, for example, in the 2022 Council Recommendation on Building Bridges in higher education (Council of the European Union, 2022). The justification for this policy option is because of the difficulties created by systems using programme-level accreditation in their attempts to create joint degree programmes.

After the adoption of the aforementioned Council Recommendation, some member states have changed their legislation or are planning to do so in order to move in this direction. However, a relevant proportion of EU countries still maintain programme-level external reviews, albeit in different formats (sampling of system programmes to be accredited, evaluation of clusters of study programmes by field, ex-ante or ex-post evaluations, different rules for art studies or universities of applied sciences) (EQAR, 2021).

Nevertheless, the desire to move towards institutional-based reviews can shift the focus away from designing quality assurance frameworks which are fit-for-purpose for their national context if the change towards institutional reviews does not fully take into account the maturity of the internal QA system and the effectiveness or impact of tools within QA for institutional reviews.

From the perspective of students, 34 out of 37 National Unions of Students believe that both institutional and programme level reviews should be required in their own jurisdiction, in stark contrast with the push towards exclusively institutional-based evaluation. This implies that students see a mixed approach as fit for purpose, able to ensure the achievement of the QA purpose and guarantee the quality of education delivery for all study programmes. For sure, one barrier in this regard is the resources needed (both financial and time-wise) to introduce both types of reviews in all HE systems.

8.1. Preference for types of external reviews to be implemented in the national context



There are some different perspectives as well, proving that moving towards institutional reviews can be successful, if some conditions are met. For example, VVS (Flanders) points out that only new programmes get externally reviewed, and the current system is accepted by VVS as long as students get a prominent role in the external review of their institution. The students' union also added that certain changes or evolution towards an institutional only QA approach might have a negative impact that would call for a return to the periodic reviews of study programmes. One of the student unions from Finland (SYL) also pointed out that while they have a preference towards institutional reviews, Finnish universities have the option to carry out programme level reviews voluntarily.

III.2 European Approach to the Quality Assurance of Joint Programmes

The European Approach for the Quality Assurance of Joint Programmes ('EA') has been adopted by the ministers of higher education in 2015 with the explicit aim of easing the quality assurance of any joint programmes and, as such, facilitating their uptake. It serves as a tool for removing the need to apply multiple QA procedures and follow additional national QA criteria for setting up joint programmes. Any EQAR-registered QA agency should be able to conduct one single evaluation of the joint programme through the EA and the decision should be recognised in all countries where the higher education institutions involved are based. For this to happen, national legislation needs to be changed, where necessary. This holds particular relevance for countries where programme-level external QA is mandatory.

In the 9 years since the adoption of the European Approach, the data from the Bologna Process Implementation Report (EHEA, 2024) reveals that in only 17 countries the EA can be used by all higher education institutions, while in 10 additional countries the EA is available to only some HEIs. The analysis carried out by EQAR (EQAR, 2023) further reveals a low take-up of the procedure, with less than 40 evaluations based on EA in the last 9 years, according to data collected from agencies uploading reports in DEQAR.

In order to grasp existing developments in the EHEA member states and the interest that the member states have in enabling the use of the EA, ESU asked the national unions of students whether there have been any consultations at the national level regarding the implementation of the European

Approach, with only 15 national unions of students confirming that such consultations have taken place. Ongoing discussions related to the use of the EA have been reported in Sweden, Bosnia & Herzegovina, Czech Republic, Faroe Islands, Georgia, Norway, Italy and Slovenia. On the other side, discussions on introducing additional requirements in the use of the EA have been reported in Iceland and Moldova.

Furthermore, we asked the NUSes whether they believe that in their national context there should be additional national requirements in the use of the European Approach. The results show that 9 NUSes support the statement, while 12 are against it and 12 do not have a position on the matter.

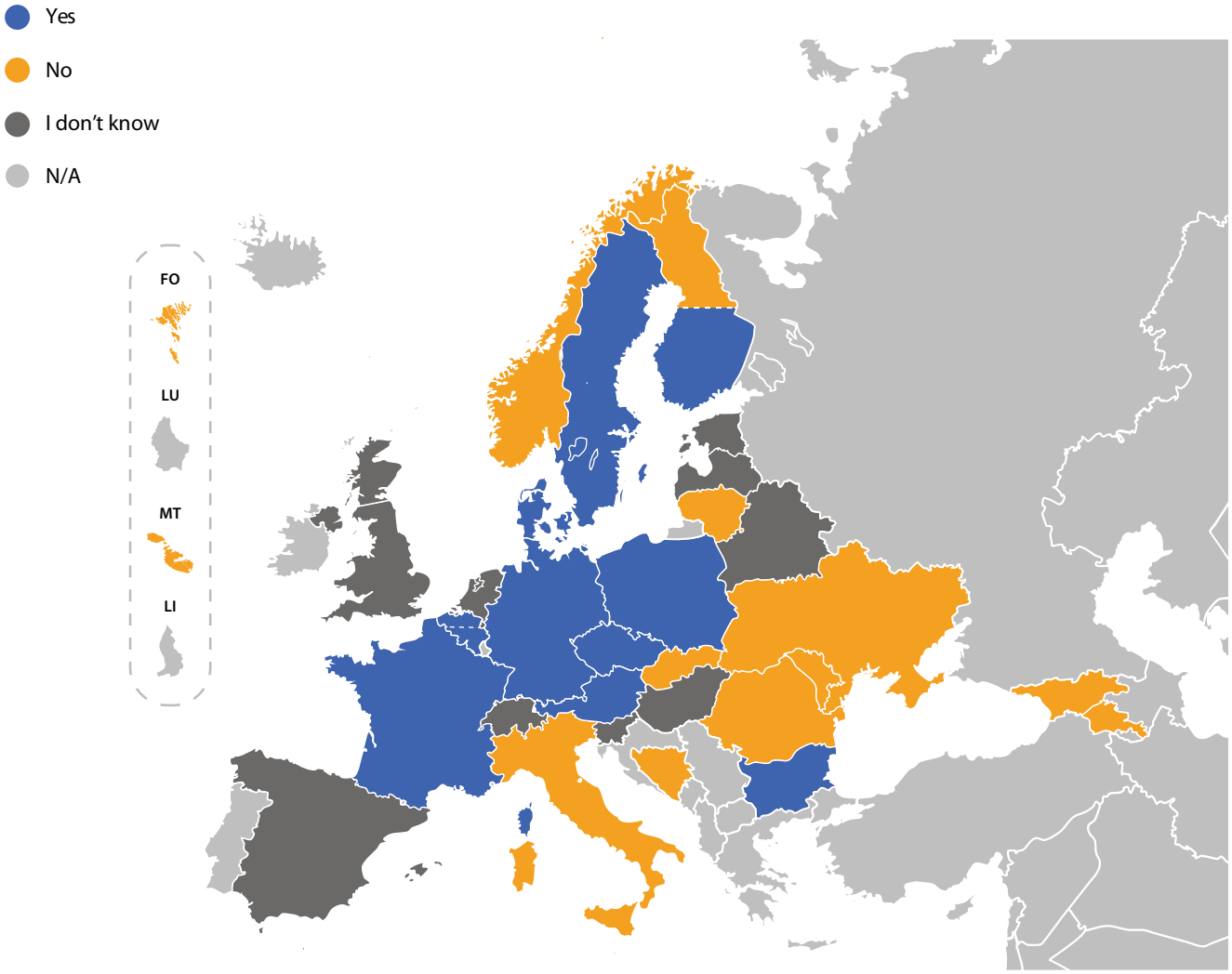
Despite this being only a minority of NUSes, having more than 25% of NUSes declaring their support for adding national criteria for the use of EA, which in itself is meant to eliminate national criteria, shows a trend worth looking into.

Several, non-exclusive presumptive explanations can be considered. On the one hand, the content of the EA can itself be considered too general for achieving the purpose of accountability and guaranteeing the quality of education provision.

It is important to highlight that the EA is not meant to replace all national legislation related to delivering a joint programme, but only to waive the national requirements related to its quality assurance.. In contrast with the idea of promoting a European degree (label), which may attempt to waive additional elements related to regulating higher education provision and as such create the imminent risk for students of losing student rights that are currently inscribed in legislation (e.g. on admission, tuition fees, academic progression), with no European counter replacement, the EA is simply a tool for simplifying the programme level external QA requirements.

However, in some EHEA member states, quality assurance methodologies include student rights (for example related to student participation in QA or assessment policies). In that case, the use of EA may render those provisions inapplicable for joint programmes. In this context, the solution would be to ensure these rules are also included in legislation.

8.2. Support for additional national requirements on the use of the European Approach



III.3 Student participation in QA

Starting from the first edition of the ESG, student participation has been an essential feature of the European model of QA. As the concept of quality education is intrinsically linked to seeing students as an active agent of their own learning, without meaningful student presence quality assurance cannot fulfil its aims.

Several provisions in the ESG mandate student participation in internal and external QA, as well as the quality assurance of QA agencies. Two main streams of thought have been put forward in favour of student participation: one stemming from the academic tradition of viewing students as key stakeholders within the academic community and partners in all facets of higher education, and another one seeing students as consumers of higher education who expect to receive 'value for money'. In contrast to the perspective that advocates for student involvement in decision-making, the alternative considers students mainly as sources of information. ESU has always argued for the first vision of the process, which has also been adopted within the Bologna Process. This does not guarantee though that the same line of thought is also universally applied within EHEA.

From the basic commitment in the ESG, which feature but do not delineate the expectation regarding student participation and the achievement of compliance with the ESG (so as to consider student participation adequate, as opposed to tokenistic or only apparent), practices have emerged and become customary for how to interpret the ladder of student participation in QA. Several publications have been issued on this topic, such as the ESQA publications (Effective Involvement of Stakeholders in External Quality Assurance Activities (Romanian Ministry of Education, 2020)) on effective participation of stakeholders or the ESU-ENQA publication 'Listen, Talk and Team Up' (ESU and ENQA, 2022).

In order to comply with the requirements of student participation and to deem it appropriate, several policies need to be set in place: that ensure that the opinion of students can impact the outcome of the process and have consequences, follow-up, equal participation in panels or internal QA bodies, outreach activities and so on. Despite being a longstanding commitment, there are still

several structural issues to overcome in order to achieve impactful student participation in both internal and external QA, despite evident progress.

There are still instances around Europe where student participation serves exclusively as decorum, integrated solely for ticking the regulatory box rather than internalising its benefits. This results in a superficial engagement of students, disenfranchising them which in turn renders the QA process ineffective. Of more concern is the persisting existence of cases where the student voice in internal/ external QA is intentionally suppressed, a practice mentioned by NUSes in Bulgaria, Czechia, Slovakia, Romania, Italy and Germany.

In some of the following sections, a separate analysis into student participation in internal and external QA is provided, highlighting that student participation in QA matters needs to be ensured, in relation to national QA laws, policies and frameworks as determined by the government. In Bulgaria, Hungary, Iceland, Ukraine, Belarus, Flanders, Faroe, UK, Moldova, Malta, Netherlands and Slovakia, national unions report that they are not regularly consulted by the government on QA policies, while unions from Germany and Italy report that even though this consultation takes place, in practice it is tokenistic. In some countries, students' involvement in governmental QA policy is ensured through membership of other representational bodies: for example in Switzerland (Accreditation Council), France (CNESER) or Czech Republic (Council of HEIs). In some cases, students are consulted at a very late stage in the process and only when governments change laws and are obliged to ensure a minimal engagement of stakeholders.

a) Student participation in internal QA

As core stakeholders of the HE system and the main authority in their own learning, students are an essential part of internal QA. By focusing on their needs and interests, their view on how 'quality' education looks andis delivered should be paramount. According to the QA FIT paper published by EUA and EURASHE (EUA and EURASHE, 2023), 73% of higher education institutions declared 'increasing student and staff satisfaction' as one of the main purposes of their internal quality assurance system.

There are different ways of ensuring student participation in internal QA, each on a different level on the ladder of student participation: from mere data providers to full empowerment.

One fundamental approach to involving students collectively in internal QA processes is through data collection. In this role, students regularly answer surveys (usually at the end of a semester or academic year) where they assess the quality of their courses and the performance of the academic staff. This essential, basic practice took years to implement across the EHEA and came with different caveats: This included insufficient coverage of all the aspects of relevance to students, low participation rate due to a mistrust in the anonymity of the process or a lack of meaningful follow-up amongst others. According to the QA FIT paper, only in 36% of cases students always have the opportunity to take part in such surveys, while in 27% of cases they usually have the opportunity. Furthermore, only in 15% of cases the results of these surveys were published, while in 24% of cases this never happened. This lack of transparency and follow-up disincentives students to fill in surveys and to trust the internal QA processes. Finally, in less than 10% of cases the follow-up of the student surveys always takes place.. Students should be engaged in designing these surveys and their interpretation to ensure contextualisation and legitimation. Participation in the bodies which analyse the results provides trust for students and ensures the effectiveness of the follow-up.

Internal quality assurance policies are developed using the experience described by students in these surveys. Such surveys may assess the broader perceptions of students by considering various factors that influence the learning process and the extent to which students can autonomously exercise their rights in the learning and teaching process. In this sense, the matter assessed is not simple satisfaction, but student agency.

Promoting the culture of quality should take place from the beginning of the study cycle. Students should be encouraged to be critical and reflective regarding their programmes, curriculum planning, assessment, learning environment and study conditions, support systems and promoting student-centred learning. The whole student body should be engaged through regular surveys (on different areas of relevance) and qualitative means, on both institutional and sub institutional levels and they should know the results of evaluations of any follow-up action taken and their impact.

Apart from the participation of the whole student body, formal participation in QA bodies should ensure a meaningful and impactful participation. This implies student participation through student representatives, acting to offer legitimacy, scrutiny, efficiency, transparency to the QA process and by offering expertise. Student representatives should be engaged in the whole policy cycle of internal QA: preparation of the internal QA strategy/plans, implementation, monitoring and evaluation, as well as in the consideration of the outcomes of IQA: preparation, decision, implementation and evaluation of policies/strategies/measures.

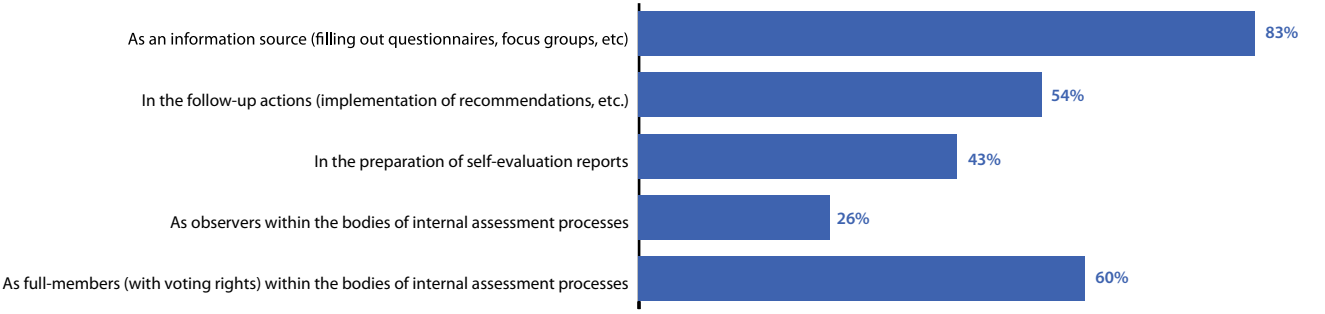
Most national unions of students confirm that students are involved in the internal QA processes of higher education institutions, showing that there is at least a minimum level of participation of students in internal QA.

Nevertheless, the unions from France, Belarus and Bosnia & Herzegovina mention that students are not generally involved in the internal QA procedures.

We further asked the national unions of students to clarify the modalities through which students are involved in internal QA. In most of the cases they are involved as an information source in internal QA (29 systems), for example by filling out questionnaires. As mentioned, this should be considered the bare minimum of engaging students in QA and should be far from being considered a reasonable level of student participation. The second, more promising, answer is through being full members within the bodies managing internal QA (21 systems). Other modalities include the implementation and follow-up of QA activities (19 systems), the preparation of self-assessment reports (15 systems) or as observers in internal QA bodies (9 systems). In some countries, such as the Netherlands student representatives write a dedicated chapter in the internal QA of the evaluation reports.

In comparison with 2020, the participation of students as full members with voting rights within internal QA bodies has increased from 46% to 60%.

8.3. Type of involvement of students in internal QA processes

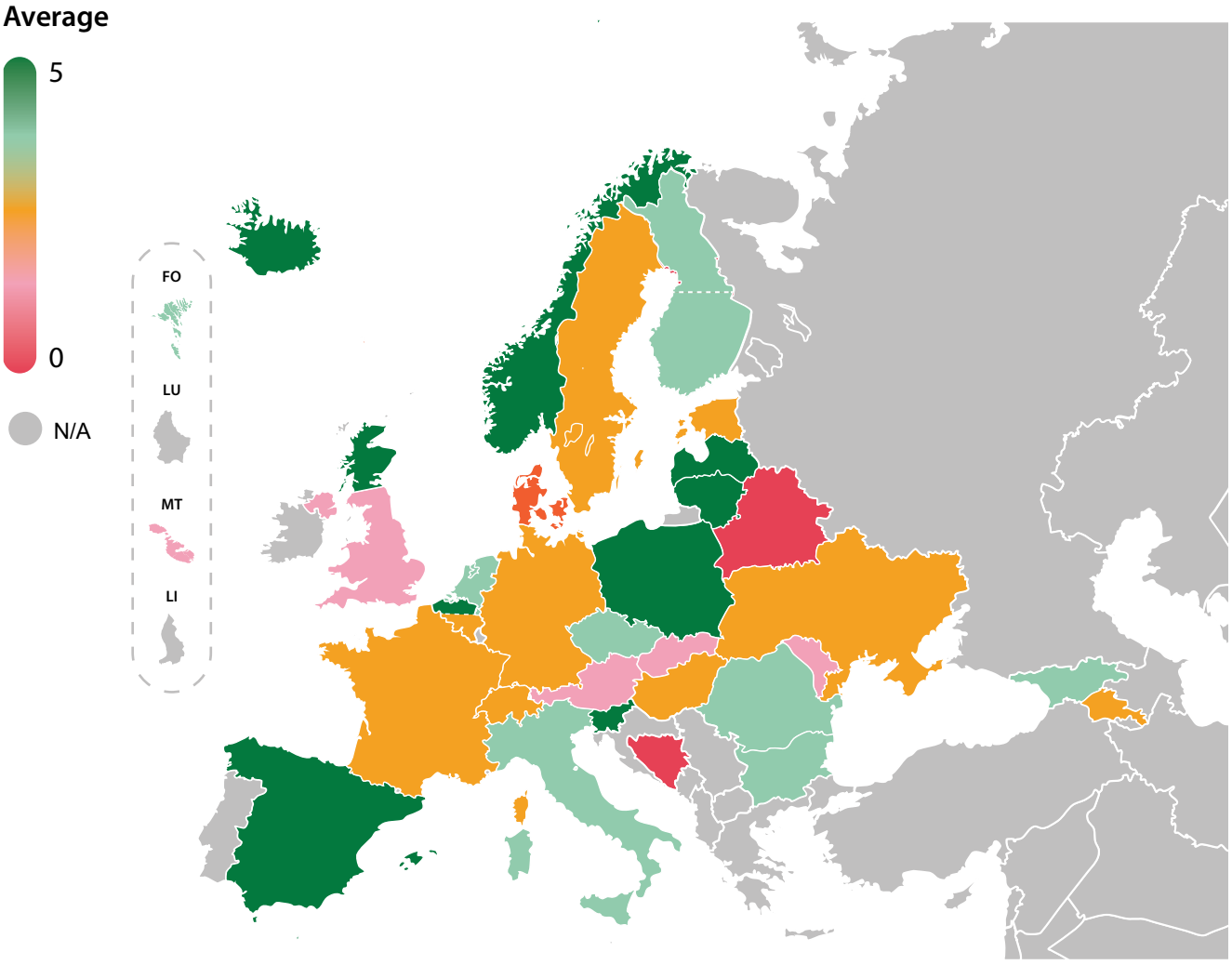


To determine the level of student participation in internal QA, ESU created a scoreboard where

- i) involving students as an information source, ii) in the follow-up actions and iii) in the preparation of self-evaluation reports were given each **1 point**,
- +0.5: participation as observers in QA bodies was given **0.5 points** and
- +2: participation as full members in QA bodies was given **2 points**.

Where students were full members in QA bodies, the additional possibility of also being observers was not taken into account. This leads to a scorecard system where a maximum of 5 points can be obtained, which is the case for Spain, UK - Scotland, Iceland, Norway, Poland, Slovenia, Belgium Flemish Community, Latvia and Lithuania. The light green category includes countries obtaining between 4 to 5 points, while the orange category includes those with 2 to 4 points. Finally, the pink category includes countries receiving between 1-2 points and on the other side, France, Belarus and Bosnia & Herzegovina obtained 0-1 points and are included in the red category.

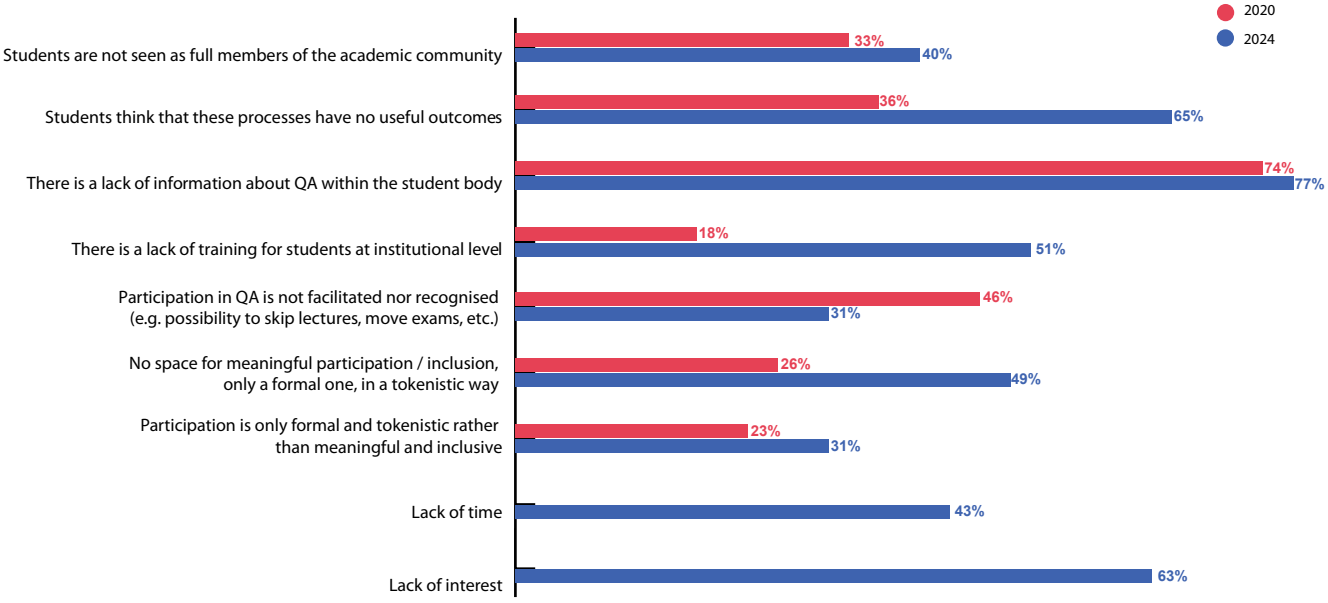
8.4. Involvement of students in internal QA processes - scorecard indicator



When considering the main barriers in ensuring students' involvement in internal QA, students' unions pointed out the following in the Bologna With Student Eyes 2024 survey: the lack of available information for the student body (77%), followed by the fact that 'Students' think that these processes have no useful outcomes' (65%) and their lack of interest (63%). More worryingly, in 40% of cases students are not seen as full members of the academic community, a significant barrier, whilst 49% point out to tokenism in student participation. A specific barrier is mentioned in Finland, as international students are not usually able to participate because Finnish language skills are required.

Compared to the data collected in 2020, the answers referring to the lack of information available to students remained at the same levels, while the indicators related to the lack of transparency and a perceived tokenism towards students as well as the perception that QA processes do not lead to useful outcomes has increased among NUSes.

8.5. Main barriers for students regarding their involvement in internal QA



One of the most clear-cut ways of ensuring student participation in internal QA is through giving students the possibility of formal representation in internal QA bodies. The NUS survey shows that only in 5 higher education systems (Iceland, Faroe, Georgia, Belgium - French Community and Italy) can we find student participation in internal QA bodies that reaches levels of over 25%, whilst in Sweden, Romania and Slovenia it settles around 20-25%. In Belarus, Bosnia & Herzegovina, Switzerland, Austria, United Kingdom and Slovakia, students are generally not present in internal QA bodies. In some countries, the minimum requirement is the inclusion of one single student, without a predetermined quota. At a median level, students are present in such formal bodies with a quota of around 10-15%, in many cases differing at national level from one institution to another. However, the national unions of students point out that in many cases it is the academic senate, where students do have a higher presence, that takes the final decisions on matters related to internal QA. This means that students have little power to influence the process if it only includes final decision-making, without any involvement in the preparation and coordination phase.

It is also observed that student participation is more evident where it is explicitly mandated by the ESG, pointing to a top-down process which shows that in some cases the true value of student participation in internal QA has not been fully internalised, but rather seen as a regulatory requirement.

b) Student participation in external QA

Students offer an irreplaceable perspective in external QA processes, where their participation is clearly required by the ESG. Through active participation in expert panels, students provide substantial contributions by integrating their unique experience as learners in the application of indicators pertaining to student life. This in turn enhances the legitimacy of the process guaranteeing the quality of education towards students and the wider public.

The EQA policies have been faster and better integrated than IQA policies, including on the topic of student participation. The student participation in external QA has also been regularly monitored through the Bologna Process Implementation Reports, latest in the 2024 edition (EHEA, 2024).

In order to determine the level of student participation in external QA, ESU created a scorecard indicator with the following indicators:

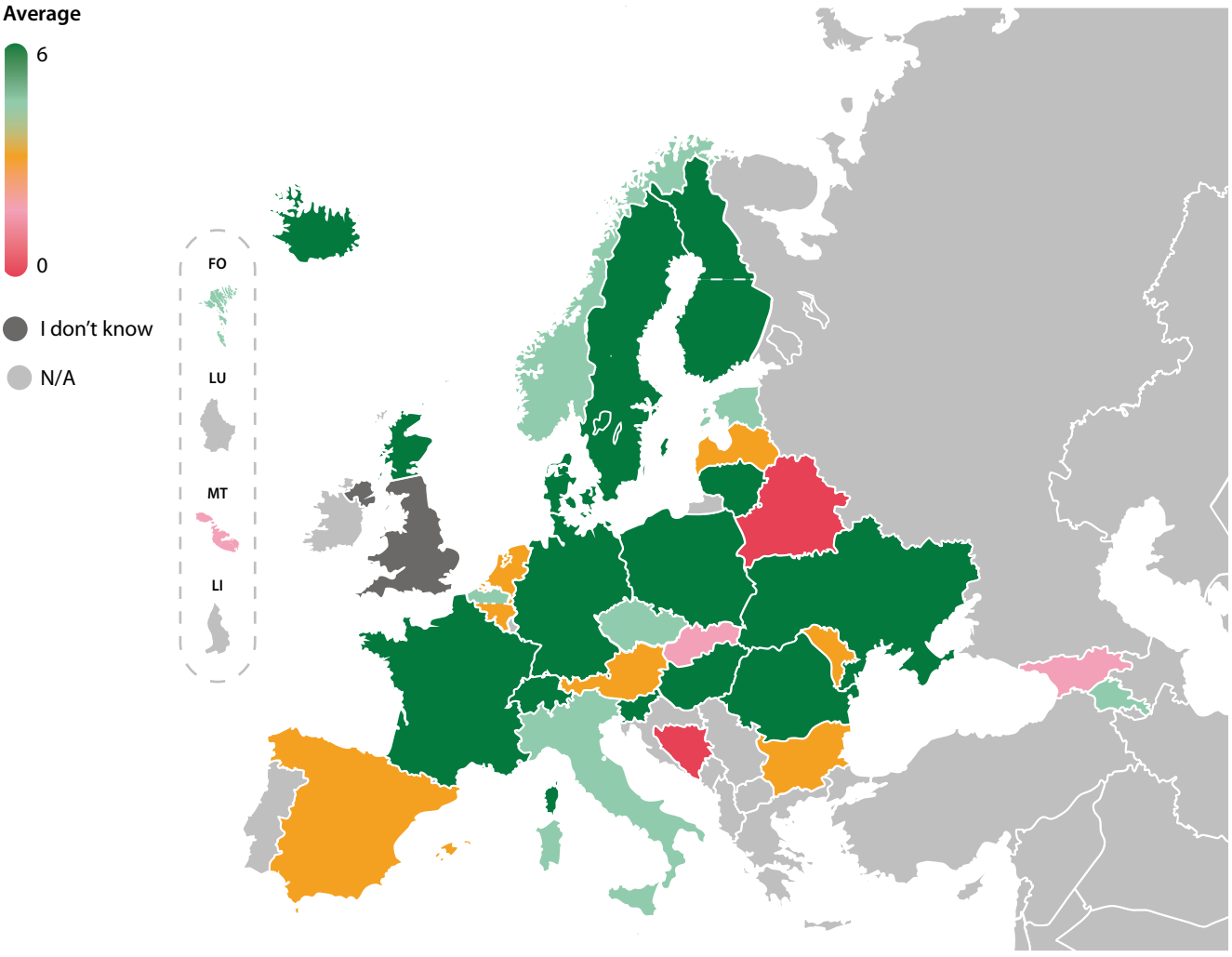
- participation in external review panels was given **1.5 points**,
- i) participation in external QA follow-up procedures, ii) participation in the design In the external QA follow-up procedures and revision of methodologies, iii) participation in the governance structures of QA agencies, iv) participation in the decision-making body responsible for approval of external review reports (either within QA agency or another accreditation body) were given each **1 point**,
- and participation in consultations organised by QA agencies was given **0.5 points**.

The maximum number that could be obtained is 6 points. The countries with the most developed external QA student participation system were included in the dark green category (5-6 points), with the lower categories being light green (4-5 points), orange(2-4 points), pink (1-2 points) and red (0-1 points).

15 higher education systems are included in the dark green category, which shows that while some progress has been achieved, there are still several higher education systems in which adequate student participation in external QA is not yet a reality. The scorecard indicator revealed that the lowest level of student participation is in Belarus and Bosnia & Herzegovina (red), Slovakia and Georgia (pink).

Students are involved in external review panels as full members in 29 higher education systems, however, national unions report that they are usually not present at all in external panels in 3 systems (Belarus, Bosnia and Herzegovina and Moldova). On the other hand, the presence of student representatives is valued and recognised in expert panels in countries such as Germany, Georgia and Malta, where students can act as both chairs or secretary of external review panels.

8.6. Student participation in external QA - scorecard indicator



Considering the equal treatment of students in external review panels and equal payment for similar positions this is not ensured everywhere. NUSes reported a lack of equal footing with other panel members in Bulgaria, Lithuania, Armenia, Italy, Netherlands, Slovakia.

The data collected through the national unions of students also points out the differences in perception compared to the data reported by the member states within the draft of the latest edition of the Bologna Process Implementation Report (BPIR) (EHEA, 2024), where 26 systems declare themselves to have met the commitment (similar indicators as ESU were used) and thus find themselves in the dark green category. The most conspicuous cases are the responses from Bosnia & Herzegovina (red in ESU's analysis, light green in the BPIR), Georgia (pink in ESU's analysis, dark green in BPIR), Spain and Netherlands (orange in ESU's analysis, dark green in the BPIR).

The main barriers perceived by NUSes in the participation of students in external QA are similar to the ones mentioned above for internal QA, evidencing especially the lack of time, interest or information (55-60%) and a lack of training (40%). It is interesting to note that for internal QA the factor of believing that IQA has no useful outcomes is among the highest, it fares at only 29% for external QA.

In the recently published QA FIT paper (ESU, 2023), 28% of surveyed NUSes agreed and 31% somewhat agreed that one barrier towards realising the potential of the ESG is to ensure that changes made after an external QA inspection are systemic. Furthermore 65% of NUSes indicated that there was a lack of a follow-up after external QA while 35% mentioned that national methodologies for QA are not applied in practice. These factors collectively serve as further reasons to demotivate students from getting involved in external QA.

The most comprehensive manner through which student participation in external QA can be ensured is through the establishment of national pools of student experts. The establishment of national QA pools for students ensures the medium for the professionalisation of student experts. This is achieved through a consistent flow of training, which should include both initial and continuous training, the development of opportunities, and exchanging experiences and good practices that eventually create a community of student experts. By maintaining student participation in external

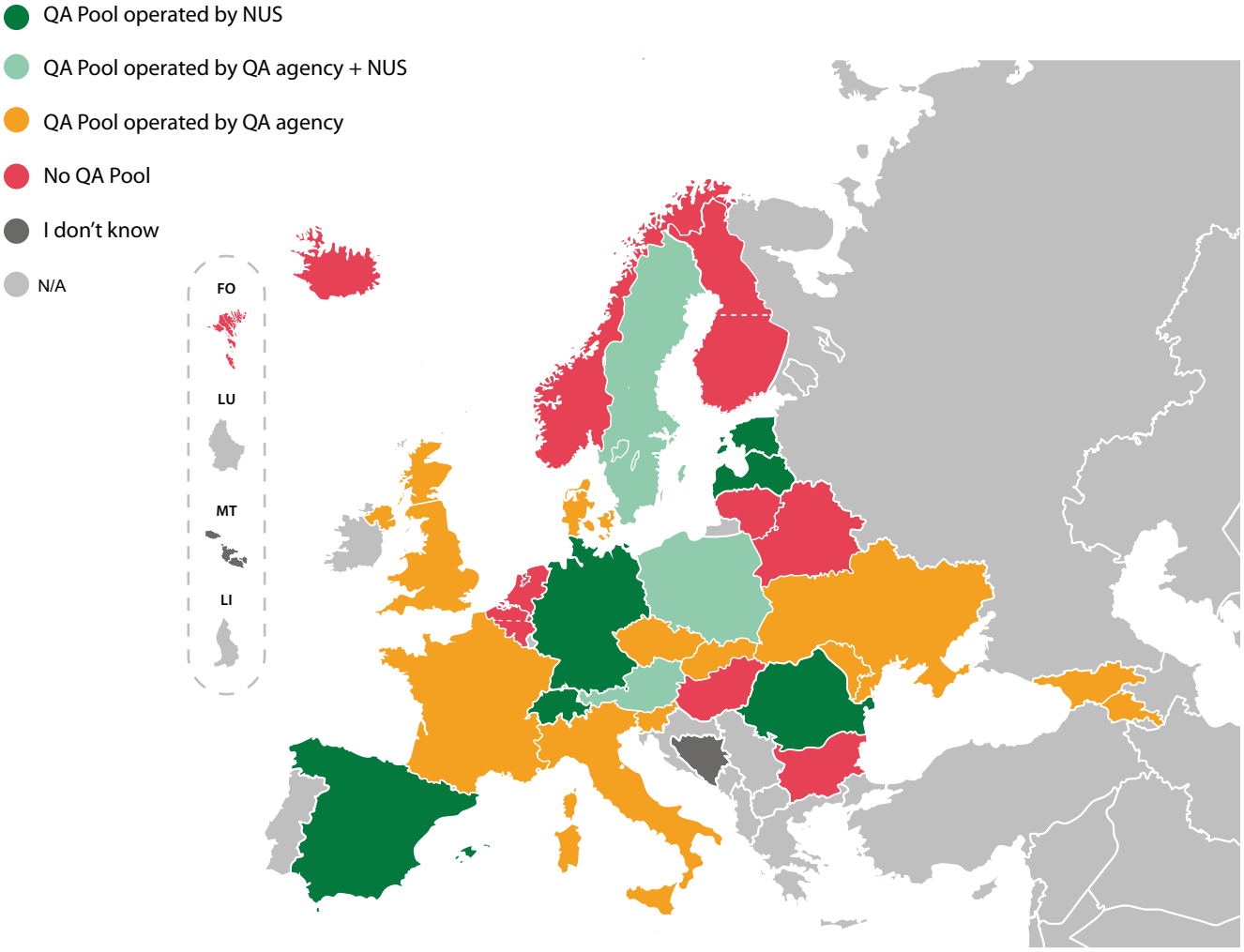
QA for a longer period, they build confidence and expertise. Considering the shorter timespan in the cycle of participation of student experts, regular training is paramount to ensure their effective participation in expert panels to ensure they are on par with other QA experts.

The student experts in national QA pools can also support internal QA in their own higher education institutions. According to the responses given by 70% of QA agencies in the ESQA study (ARACIS, 2020), the lack of knowledge in QA poses a barrier for student participation in external QA. However it is incumbent upon quality assurance agencies, together with the national unions of students, to train student experts in order to develop their knowledge and understanding of QA processes, and the creation of a national student experts pool is instrumental in this endeavour.

According to the data collected in the 2024 Bologna With Student Eyes survey, national QA student expert pools are established in 21 higher education systems. Out of those, in 6 higher education systems (Spain, Switzerland, Germany, Romania, Lithuania and Latvia) the pools are managed by the National Union of Students or the NUS has a leading role in managing the pool. Co-management roles of the NUS together with the QA agency can be found in three systems (Austria, Poland and Sweden) while in 12 other systems the pool is managed exclusively by the QA agency. The participation of NUS in the management of the pool empowers students and ensures their perspectives are taken into account in the design and delivery of the trainings, selection of student experts or nomination processes for external reviews.

On the other side, a lack of transparency in the selection, training and nomination of students can have detrimental effects, especially in the trust given to the process. This is evidenced also by the examples given by NUSes. In Bulgaria, the selection process for student experts is conducted via contacting universities and rectors, which raises concerns on the transparency of the process. The same verdict is given by the Danish union. In Slovakia training does not take place regularly, i.e., between 2017 and 2023 no training had been conducted for new student experts. Several unions also pointed out instances of inadequate and poor management practices in conducting the training for students. Examples of such practices include the provision of online training sessions for more than a hundred participants simultaneously or combining training for students, academic staff and stakeholders without explanation of each stakeholder's role.

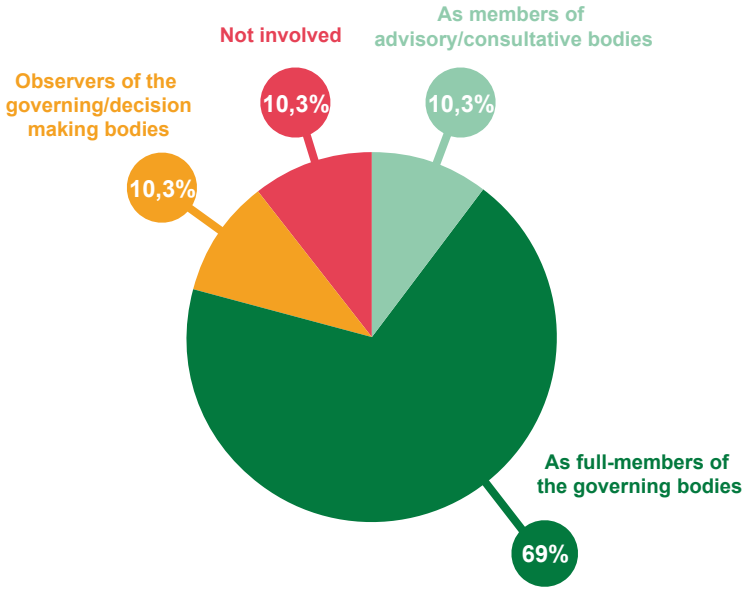
8.7. Situation of the QA Student Experts' Pools



Considering the level of student participation, whilst national legislation and policy on QA is determined by the government, QA agencies have an equally essential role in conducting the reviews, and in determining the methodologies and guidelines for external QA and approving the results of the reviews.

Therefore, student participation in external QA also implies their participation within the governance of the QA agency. In 69% of cases, students are involved with full rights in the governing bodies of the QA agency, while in 10% of cases they are mere observers. The results of the Bologna With Student Eyes also indicates that whilst in 10% of cases students are members of advisory bodies, they are unable to shape the agenda and make their voices heard, whilst in 10% of cases students are not present at all, which raises the question on the commitment of the respective agencies to serve the public interest.

8.8. Student involvement in QA agencies



The average participation rate of students in the governing bodies of QA agencies is around 10 to 15% of the total number of members of the body. The results of the 2024 Bologna With Student Eyes show a participation rate of over 25% in Georgia, and participation between 20-25% in Denmark, Sweden, Finland, Norway and Malta. According to the ESQA Study on stakeholder involvement in external quality assurance (Romanian Ministry of Education, 2020), in around 60% of higher education systems, the involvement of students in the QA agency is determined by the national framework, while in around 80% of cases, it is regulated within the procedures of the QA agency.

Apart from the general question of student participation in the governance of the QA agencies, various approaches can be observed. In Iceland, the student member of the governing board is an international student, selected through an open call. In Norway, the board of NOKUT is appointed by the Ministry of Education and Research and consists of nine members. One member must be a student from a higher education institution, and one member a student from a tertiary vocational college. In the United Kingdom, the student member of the Quality Assurance Agency's (QAA) Board also co-chairs the QAA's internal engagement panel. In the Belgium - Flemish Community, the national union is part of a Sounding Board including the representatives of HEIs and university colleges.

The most comprehensive level of student participation is found in Romania, where 2 students are members of the ARACIS Council, in addition, students are represented on the Ethics Committee, the Accreditation and External Evaluation departments, the 13 study field committees, as well as in the appeals committees. Students are also members with full rights in the selection panel for the academic staff who are members of the Council.

Although positive developments in student participation in QA processes can be observed, it is also important to ensure the commitment needed to maintain and improve student participation and its efficacy.

III.4 Cross-border QA and EQAR

With the premise that a comparable system of QA has been established across Europe, with the ESG as the common minimum standard, one Bologna commitment is that higher education

institutions should be able to choose any suitable EQAR-registered QA agency to conduct external reviews, including having the possibility to fulfil the national requirements for mandatory external QA. This intended freedom has several benefits for the higher education institutions, improving their internationalisation, their capacity to benchmark them to other HEIs in Europe, and selecting suitable QA agencies that may focus on institutionally relevant strategic areas for development or in offering novel approaches.

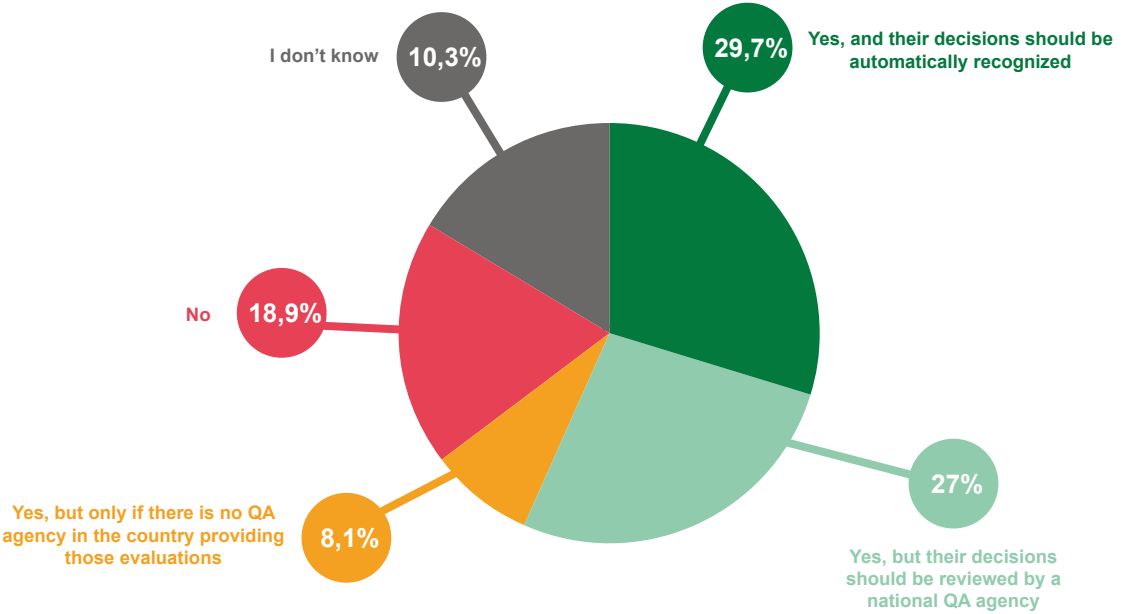
Based on their experience with cross-border QA, we asked national unions of students about their perception on whether cross-border QA should be allowed in their country as part of the mandatory external QA review.. In total 56.7% of NUSes agree with this statement, with 29.7% mentioning that the decision of the QA agency should be automatically recognised, while 27% qualify the decision as long as there is approval of the report by the national QA agency. Furthermore, 8% believe the openness should be subject to restrictions based on whether there is a suitable QA agency in their own country, while 19% of NUSes disagree with the principle.

In the 2020 edition of Bologna with Student Eyes, 5% of NUSes disagreed with the commitment to openness of cross-border QA. The difference between the negative answers in 2020 versus 2024 was due to the fact that the 'yes' option was replaced with the option 'additional national requirements'.

As per the communiques, the openness to cross-border QA does not imply a full renunciation of the national QA requirements. Whilst international QA agencies should be able to operate freely across the EHEA, without undue burdens or barriers, this also implies taking into account the legal framework on QA in each jurisdiction. According to the Key Considerations for Cross-Border Quality Assurance in the European Higher Education Area, (ENQA et al., 2017) published by E4 and EQAR, the cross-border QA activity may be contingent on the national higher education framework and other specific national regulation. In case cross-border QA is part of the national mandatory QA, the institution and QA agency should consult and involve as appropriate national regulatory bodies. However, there is a distinction between reasonable national rules and those that de facto serve as an unjustified barrier (e.g. all members of the panels having PhDs, pre-approvement of the joint programme's draft agreement by the national QA agency, having the evaluation solely in the national language).

Furthermore, the answers from NUSes are based on a limited interaction with international QA agencies because of the Covid-19 pandemic, but also on the perceived phenomenon of 'agency shopping', suggesting that some HEI's could choose QA agencies which more easily offer positive evaluations. EQAR analysis (EQAR, 2023) shows the result of external QA reviews for domestic and international QA agencies (53% positive results for domestic QA agencies, 69% positive results for international agencies). The differences can be generally explained by the nature of cross-border reviews, which often serve as an add-on to the mandatory external QA review.

8.9. Perception on whether foreign QA agencies registered in EQAR should be allowed to operate in other countries



One of the tools created by EQAR to support the transparency of QA, the accountability of HEIs and recognition procedures is the Database of External Quality Assurance Results (DEQAR). According to the responses by the national unions of students, 80% of the national unions of students are aware of the existence of DEQAR and a quarter of them use this database regularly, while 20% never used it. The main purposes of using DEQAR was to see its structure, features and how it works (16 NUSes), to consult precise QA reviews reports (14 NUSes) and to get information about specific higher education institutions (12 NUSes).

Several purposes of EQAR are indeed recognized by the student organisations, especially encouraging compliance with the ESG (49%) and supporting European policy in QA (40%).

IV. Key takeaways and policy recommendations

In comparison with other policy areas within the Bologna Process, quality assurance has generally seen a more uniform implementation and engagement from the wider higher education community in the EHEA. These positive results have been rightly placed on the enabling framework to incentivize compliance with the commitments in QA, especially through the need to align the system with the ESG. The approach of having ESG-compliant QA agencies that can externally assess the quality within HEIs with outcomes seamlessly recognised within EHEA can help make the vision of EHEA a reality.

While QA is an example for other policy areas in the Bologna Process, it does not equate with the fact that full compliance with the QA commitments has been achieved. Notwithstanding those countries whose progress is lagging in the most basic commitments related to quality assurance, there are still several challenges to address even in more advanced systems.

ESU believes that a one-size-fits-all approach towards eliminating programme-level reviews is misdirected and hurried. One of the strengths of the QA policies is agreeing on the bare minimum which should be enacted across the EHEA for accountability while preserving the diversity of the systems for enhancement, catering for the needs of higher education communities and national contexts through a fit-for-purpose approach to QA policies. This also applies to the types of review chosen.

While new developments such as microcredentials, digital education or European University Alliances require additional attention, especially towards how particular elements of the ESG are applied to them and how successful QA methodologies are created to take them into account, this should not turn the focus away from fully complying with the ESG. There is a need for a further deepening of the integration and implementation of the core elements of the ESG and the commitments related to QA in the Bologna Process, as also evidenced in the survey of priorities for member states in the Action Plan (EHEA, 2023) of the thematic peer group on quality assurance.

The next cycle in the Bologna Process should also see the revision of the ESG, in order to adapt it to new trends and challenges in higher education and QA, especially linked to social dimension and other fundamental values, and to make the standards and guidelines, as well as their application clearer.

One area which needs enhanced emphasis is the growing offer of transnational education (TNE), by concretely addressing through policy measures the quality assurance of the offering of TNE. Whilst in 2020 ministers in the Bologna Process committed themselves to quality assuring transnational education with the same rigour as for domestic higher education provision, this is far from being achieved and students remain susceptible to falling into the trap of poor quality education provision or unrecognised qualifications. In the meanwhile, little progress has been made despite common efforts towards transposing the vision depicted in the Rome Communique into reality. The Bologna Process should thus seek to address this issue through a systemic approach, starting from working with stakeholders to better understand the complexity of the phenomenon.

While acknowledging some recent progress, especially in the light of the European Universities Alliances, ESU also highlights the importance of finally integrating the use of the European Approach for the Quality Assurance of Joint Programmes in national legislation. This should serve as an easy step, but with a crucial impact for boosting transnational cooperation in education delivery. In the meanwhile, apart from the QA element, member states should reflect upon which additional national criteria serve the public interest and have to be maintained irrespective of domestic or joint delivery (for example guarantees of accessibility and equity in admissions, lack of tuition fees, support systems or guarantees of student participation and justified rules on assessment) and which criteria should be removed for joint programmes in order to support its implementation. ESU also believes that any tool created within

the European Education Area to ease the internationalisation process, such as the European degree label, should be available for any type of cooperation between HEIs located within the EHEA.

Despite notable progress in the participation of students in external QA, student involvement in internal QA still remains in many cases tokenistic, only as a facade, limited to consumeristic approaches. In most of the cases students are involved as an information source in internal QA (29 systems), although in less than 10% of cases follow-up of the student surveys is always a reality. Students are full members within the bodies managing internal QA in 21 systems, but not in all policy areas and in all stages. Lack of information for the student body (77%), followed by the fact that 'Students think that these processes have no useful outcomes' (65%) is still one of the biggest barriers for student participation, which leads to mistrust and apathy, further making their engagement more difficult. For external QA, the lack of training is one of the biggest barriers, not compensated by the fact that there has been no progress in the establishment of QA pools. All this signals the need to move from a formal participation in QA, which is widely achieved, towards a more meaningful and wider student participation, which requires both resources and a paradigm shift.

Finally, in order to promote cross-border QA, there needs to be better comparability of practices for implementing ESG, especially when QA agencies carry out cross-border external QA. According to the survey results, students believe that EQAR's role in this endeavour is paramount.

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Keys commitments

I. Introduction

In the 2018 Paris Communiqué, the ministers of higher education brought into the limelight the long-standing commitments made within the Bologna Process which, due to their importance, were designated as key commitments. This designation does not imply a lesser importance of other commitments, but rather the key commitments' role in a) fostering the minimum comparable and compatible elements to ensure that the EHEA can coherently work as a whole and b) their function as a basis for the development of other common policies on a solid framework.

These key commitments are:

- A Three-Cycle System compatible with the Qualifications Framework of the EHEA and first and second cycle degrees scaled by ECTS. As a corollary, this also includes the adequate use of learning outcomes;
- Compliance with the Lisbon Recognition Convention (LRC), including the use of the Diploma Supplement;
- Quality Assurance in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

The key commitments are the most well-known transformative tools of the EHEA. Among the main reforms, the three-cycle system sparked the most controversy, with critical voices still present today pointing to misgivings in the architecture of the system.

There are many drivers for the key commitments and their interlinkages underline the importance of treating them as a whole. Transparent frameworks of qualifications ensure flexibility for students: they can choose diverse learning paths underpinned by the same 'token' of learning, scaled in ECTS, for both accumulation and transfer. This promotes mobility, whilst students, employers and society at large can also, at least in theory, understand what acquisitions (learning outcomes, i.e. knowledge, skills and competences) students are expected to have at the end of a cycle. For students, such a transparent system would also mean they are assessed against pre-defined acquisitions

in a predictable and equitable manner. This, in turn, provides guidance for prospective students in choosing their study programmes and understanding the role of each degree. Qualifications frameworks also integrate non-formal and informal learning, which permits the recognition of prior learning as well as a combination of learning routes. The qualifications and consequently the rights attached to them are supposed to be easily recognised across the EHEA thanks to the Lisbon Recognition Convention (1997), and by providing information to all parties through the Diploma Supplement. Finally, quality assurance is the prerequisite of trust in the overall system, as well as for each degree, eventually also closing the loop of ensuring the implementation of the key commitments by integrating their proper implementation in QA procedures.

This chapter analyses the implementation of two of the three key commitments from a student perspective. Due to the broad scope of the quality assurance commitments and the significant role played by students' in QA, a dedicated chapter will address this topic in a comprehensive manner.

II. Bologna commitments

In the Bologna Communiqué, ministers of higher education declared that the degree structure sits at the core of their cooperation, ensuring more comparability, mobility, competitiveness and attractiveness as well as greater national and European employability. They committed to a first cycle lasting at least three years and leading to a first degree that is 'relevant to the labour market'. In this context, the second cycle shifted its focus more on research, culminating in the attainment of a PhD at the end of the third cycle.

In the Prague Ministerial Communiqué, the ministers clarified that 'Programmes leading to a degree may, and indeed should, have different orientations and various profiles in order to accommodate a diversity of individual, academic and labour market needs'. The programmes would be underpinned by the qualifications framework, which should encompass a 'wide range of flexible learning paths, opportunities and techniques' (Berlin Communiqué). The learning outcomes and student workload would also determine the allocation of credits, in accordance with the ECTS Users Guide (last revised in 2015).

One overarching issue addressed in the past but losing steam due to a lack of appropriate follow-up, is the nature of the masters programmes. In 2012 (Bucharest Communiqué), ministers asked for 'exploring further possible comm on principles for masters programmes in the EHEA, taking account of previous work'.

In the same year, the ministers decided to align the QF-EHEA with the European Union's European Qualifications Framework levels 6, 7 and 8. In 2015 (Yerevan Communiqué), ministers included the short-cycle higher education as a self-standing qualification level and in 2018, following the Paris Communiqué, the whole QF was updated. Finally, in 2020 (Rome Communiqué) ministers asked the BFUG to update the criteria based on which member states self-certify their national qualifications framework against the QF-EHEA 'to include a stronger element of peer review of national report'.

For the Diploma Supplement, in 1999 (Bologna Communiqué) the ministers highlighted the importance of the Diploma Supplement as a transparency tool to enhance the readability and comparability of degrees. By 2005 (Bergen Communiqué) ministers committed themselves to ensuring that every student should receive the Diploma Supplement automatically and free of charge upon graduation, in a widely spoken European language. The Diploma Supplement has been subsequently revised in the 2018 (Paris Communiqué).

On the topic of recognition, the ministers embraced the already existing work of the Council of Europe and UNESCO based on the Lisbon Recognition Convention, adopted in 1997. The 2012 Bucharest Communiqué first introduced the notion of 'automatic recognition' and endorsed the European Area of Recognition (EAR) Manual to support the implementation of automatic recognition. The Rome Communiqué (2020) dedicated a substantial part to the topic of recognition. The Communiqué emphasised the importance of strengthening the implementation of the Lisbon Recognition Convention. The Communiqué also recommended applying principles of the convention to qualifications and periods of study outside the EHEA, achieving automatic recognition and ensuring fair recognition of qualifications held by refugees.

III. Analysis of Bologna commitments implementation

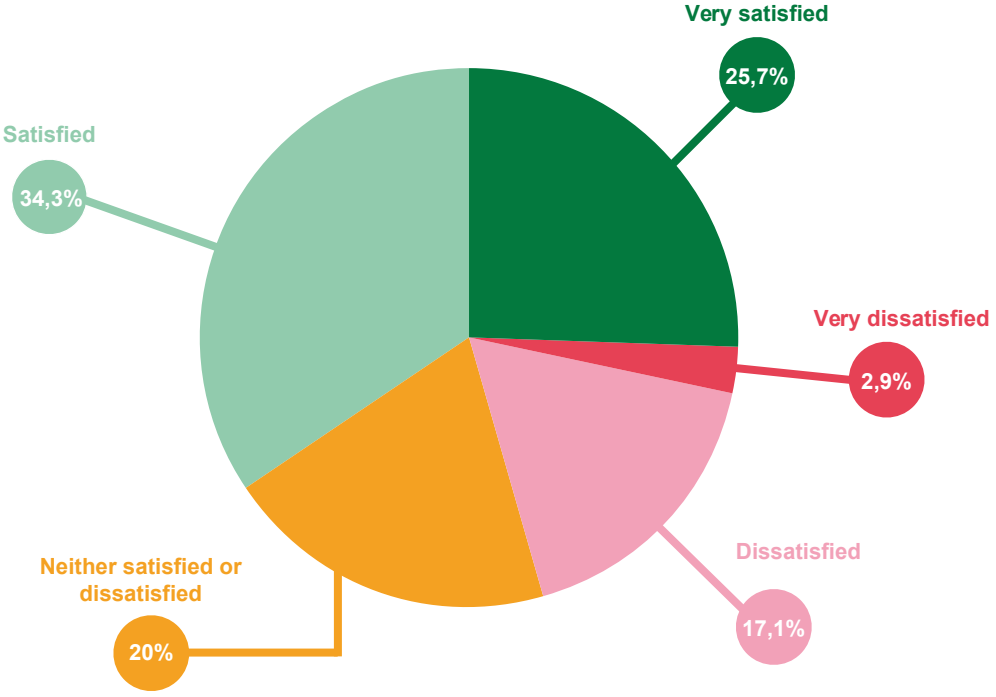
1. Three-Cycle Structure - Bachelor, Masters and PhD

The first topic where we gauged the perspective of the national unions of students related to the Bologna Process implementation was the three cycle structure. As mentioned above, one of the most far-reaching and impactful decisions within the Bologna Process was moving towards a three-cycle approach, influenced by the Anglo-Saxon system of degrees at the dawn of the Bologna Process. Despite its merits of consistency, the implementation of the three-cycle system was eventually long, ambiguous and poorly managed. The lack of engagement with or understanding from the academic community generated ample criticism, some of which still persists today. In practice, despite common commitments to achieve the three-cycle structure based on QF-EHEA, different interpretations and conceptions exist on how this should become a reality, resulting in persistent disparities between member states, especially in Eastern Europe.

In the process of implementation, the unions remark in the survey results that the former long version of the degree (bachelor + masters) programmes were simply 'cut in two', leading to a lack of coherence in the designs of study programmes and expecting all students to enrol into a masters programme after their bachelor degree. This went contrary to the expectation that, on the one hand, a bachelor would be sufficient for labour market purposes, and on the other hand, that flexibility would be offered to students to pursue a wide range of masters programmes after their graduation from a bachelor degree. In some cases, masters programmes were not designed to suit students who do not possess a bachelors in the same study field. In other cases, former long programmes were stretched into a bachelor+masters or, on the contrary, compressed into one bachelor programme. The different National Unions of Students hold varying stances on these changes, i.e., either supporting or being against such a move depending on the success of the implementation. Some expressed support for the long study programmes related to the domains under the Directive 2005/36/EC on the recognition of professional qualifications (e.g. from medical field or architecture).

In general, we observe that 59% of the national unions of students are either satisfied or very satisfied with the implementation of the three-cycle structure in their higher education system, while only 20% are dissatisfied or very dissatisfied. The successful introduction of the three cycle system in most countries nearly 20 years ago shows a positive developmental trend and a process of consolidation and clarification. From the responses it can be further concluded that most complaints refer to the nature, scope and structure of masters programmes, rather than bachelor.

9.1. Student satisfaction with the implementation of the three-cycle system



While overall the assessment is fairly positive, we aim to present below several challenges presented by some unions:

- fzs from Germany points to increasingly inflexible conditions, contrary to the stated objective, less choices within programmes, more school-like programmes and increased pressure from exams, as well as not sufficient places that would guarantee the possibility to enrol in a masters degree programme after completing a bachelor. Also German landers implemented the cycle structure differently, limiting national mobility;
- CREUP from Spain and others mention a rushed implementation which did not take into account learning outcomes;
- ANOSR from Romania mentions issues especially with masters programmes, which sometimes just repeat the same disciplines taught at bachelor level without developing more challenging learning outcomes associated with the masters level;
- UDU from Italy mentions how the three-cycle structure indirectly fosters inequalities between the richer Northern HEIs and the poorer Southern HEIs, as the possibility of creating attractive masters programmes is deeply related to the financial means of the HEI;
- FEF from Belgium-French Community pointed out that shorter studies lead to more pressure on students, especially if they do not have built-in flexibility, the latter also being mentioned by SYL from Finland. FEF also mentions cases where 4 year bachelor level degrees are coupled with 2 year masters level degrees, actually prolonging the length of studies.
- FAGE from France and SPUM from Montenegro also refers to instances where a bachelor degree is not perceived as sufficient for accessing the labour market.
- HOOK from Hungary generally points out the risk of reducing time spent in higher education through shorter bachelor programmes. .
- Unions also point out inadequate use of learning outcomes.

This is further exacerbated by issues related to recognition, with e.g. countries with 4 year bachelor degrees having to recognise students that have graduated a 3 year bachelor degree, which can be considered insufficient either for enrolling in a masters degree (as the student cannot accumulate the required 300 ECTS, during a one year masters programme). Finally there is also the lack of flexibility for those with a VET degree trying to enrol in bachelor/masters degrees. This affects the permeability of the learning pathway.

All the above points to lingering challenges in the implementation of the three-cycle system, with unintended consequences.

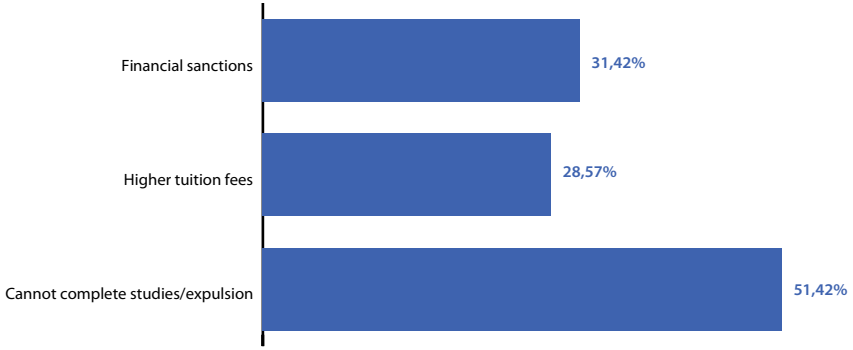
One of the biggest overarching challenges is related to the shorter timeframe for completing a cycle combined with the lack of flexibility, both between and within cycles. The introduction of the cycle-system was not meant to reduce flexibility.

When asking the national unions of students whether there are any restrictions on how many semesters/terms a student can take to complete a cycle, for each cycle the following are reported:

- in 13 higher education systems there are national restrictions;
- in 15 higher education systems the existence of restriction depends on the higher education institution whilst
- for 6 higher education systems (Estonia, Faroe Islands, Bosnia Herzegovina, Sweden, Lithuania and Georgia) there are no reported restrictions.

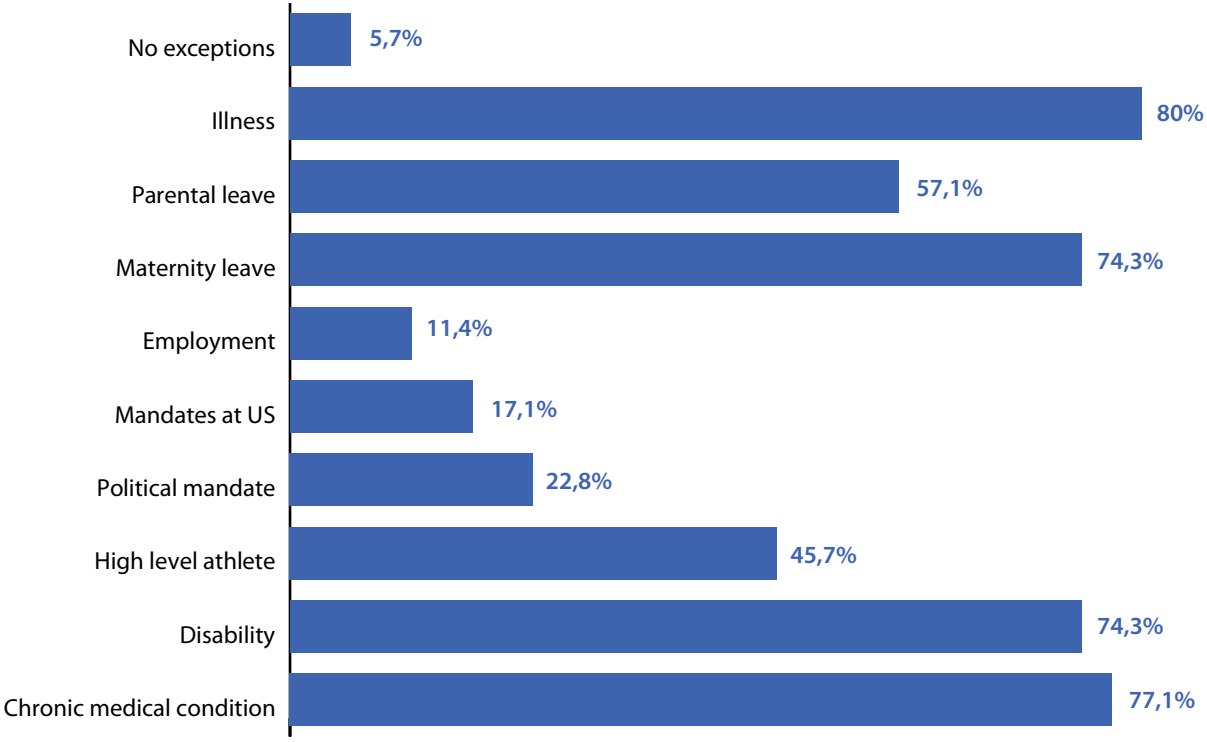
The most common consequence when exceeding the limit for the completion of a study programme are expulsions (18 systems), followed by financial sanctions with regards to student support measures (11 systems) and higher tuition fees (10 systems) (see figure below).

9.2. Consequences for students exceeding the expected number of semester for completing a study programme



Most higher education systems allow extending the graduation time without any punitive consequences in some defined cases. Usually such exemptions are granted based on personal conditions or events, such as illness, disability, chronic medical condition, parental leave. A smaller number of higher education systems allow exemptions due to employment or being on leave due to student representative duties. Finally, some also allow exceptions for military service.

9.3. Exceptions for delaying completion of study programmes without penalties



We can observe that in most cases the strategies for ensuring timely completion of studies are punitive. While in most cases the victim is the student, In 12 higher education systems there are also financial penalties for HEIs if students don't complete their studies in the nominal period.

These practices are in contrast with the objectives of flexibility, student-centred learning or even lifelong learning practices. Punishing students with the withdrawal of financial support for not finishing in time not only does not support the objectives of increasing completion rates, but can be counterproductive leading to higher rates of dropout. Limiting the number of semesters allowed to complete a degree may have a similar impact due to the inflexibility of the study programme.

Apart from such measures, alternative systemic policies are presented by one of the students' unions from the Netherlands (ISO) which mentions the role of counselling and guidance before choosing a study programme, which supports students' decision in completing the degree.

2. Short cycle

While in the initial stages of the Bologna Process ministers were hesitant to introduce the short cycle within the cycle system, especially due to different practices related to its standing within the national qualifications framework and its place in the learning trajectory, more recently the short-cycle has been integrated in the QF-EHEA. Nevertheless, it is not a commitment of HE ministers to create short-cycle degrees, as its deployment at national level is voluntary. However, when in place, students graduating from short-cycle study programmes, as part of a higher education degree, should benefit from the same advantages of the Bologna Process linked to the recognition and awarding of the degree.

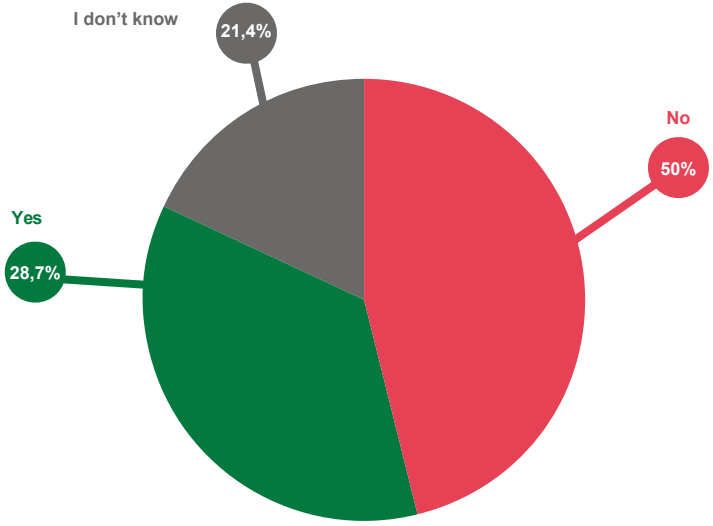
18 national unions of students reported that short-cycle degrees are in place in their national higher education systems. In these systems, only 29% of unions agreed that there is enough information provided to students in regards to the deployment of the short-cycle.

When in place, the short-cycle can support students who otherwise would have not entered higher education, due to personal or professional circumstances. Short-cycle studies generally support

the upskilling of learners with a higher education degree, usually in the field of applied sciences or other specific professions.

NUSes expect that the short cycle is supported with adequate information related to the learning offer, the learning outcomes, how the degree would be recognised and its benefits. In half of the cases unions report that this information is missing.

9.4. Sufficiency of information provided to students in regards to the short-cycle



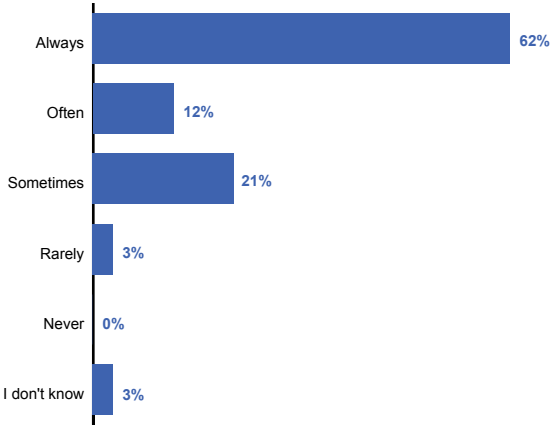
Out of the 14 unions that expressed an opinion on whether they are satisfied with the integration of the short cycle, 5 were satisfied (Denmark, Georgia, Latvia, Sweden Iceland) and 3 (from Armenia, Lithuania and Italy) were dissatisfied. When asking the national unions of students within higher education systems where the short cycle is not in place whether they would support the introduction of a short cycle, 5 responded favourably, 3 were against the idea of introducing such a short cycle and three did not express a position on the matter.

3. Qualifications Frameworks and the use of learning outcomes

Looking at the progress made through the Bologna Process in the past years, the adoption of a national qualifications framework, comparable and based on its self-referencing to the QF-EHEA and compatibility with the EQF, has supported both international mobility through recognition and a clearer standardisation of degrees. However, equally important for students, the adoption of NQFs has supported the move towards using learning outcomes, contributing to changing the learning and teaching approach from traditional (mnemonic) to student-centred, even in cases where learning outcomes-based programmes were not formally and effectively developed. Implementing Learning Outcomes, which ministers committed to ('the necessity for ongoing curricular reform geared toward the development of learning outcomes' - Leuven/Louvain la Neuve Communique 2009) has been linked to student-centred learning, recognition, and recognition of prior learning and mobility, with a view to promote transparency and compatibility of higher education systems within the EHEA.

While from a normative perspective, there is an expectation in EHEA member states that higher education institutions take into account the level of NQF and its descriptors when determining learning outcomes for a study programme, this does not necessarily happen in practice. Asking whether they are used by higher education institutions in the design of study programmes and when drafting the learning outcomes, 62% of NUSes answered this is always the case, 12% answered that it happens often, 21% of NUSes said sometimes and 3% rarely (see figure below). For comparison, in 2020 only 40% of NUSes declared that NQF is always used, while 32% considered it is often used in the design of study programmes. A promising development can be therefore observed. Especially where QA mechanisms do not evaluate the formulation of learning outcomes, several problems can be identified. These relate especially to not explaining learning outcomes to students or having study programmes with a long list of learning outcomes.

9.5. Usage of the National Qualifications Framework (NQF) by HEIs in the design of study programmes

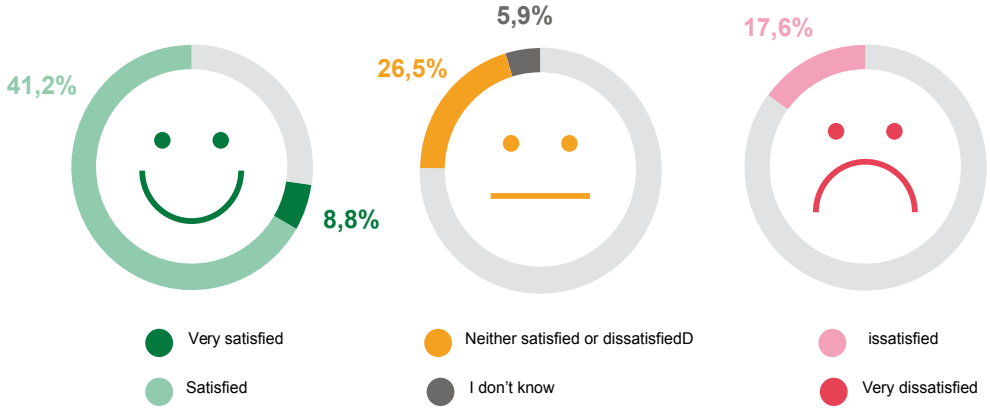


Furthermore, in some cases the potential of NQF is not adequately used for scaling non-formal and informal learning or for the recognition of prior learning, which means that the intended flexibility is not ensured. One challenge is related to the perennial dichotomy between being more concise (in order to enhance comparability and recognition) and more abstract (to foster flexibility).

NQFs should also be used by students and employers to understand the qualification level, as well as the level of knowledge, skills and competencies. This implies that the NQF presentation is user-friendly and accessible. One way to ensure this is through the participation of stakeholders in the design and/or reassessment of the NQF. From the data collected, in 18 higher education systems the national unions of students were involved in such a process, they were not involved in 11 systems and 5 unions did not know. A special situation is noted in the Czech Republic, where the national union declares that the NQF is only facultative. In Italy, the national union of students decries the overall lack of involvement of social partners in the work related to NQF, which is exclusively attributed to a group of experts.

Overall, 61% of the national unions of students are satisfied with the developments related to NQF in their country, 31% are neither satisfied nor dissatisfied while only 7% are dissatisfied. Compared to the data gathered in 2020, 43% of NUSes were satisfied with the developments related to NQF, while 24% were dissatisfied, showing that there has been some progress in the perception of the student unions. One rationale for this was related to the advancements in the integration of microcredentials in the NQF, which required consultations with the sector and as such a reachout to students' unions as well.

9.6. Satisfaction with the implementation of the national qualifications framework



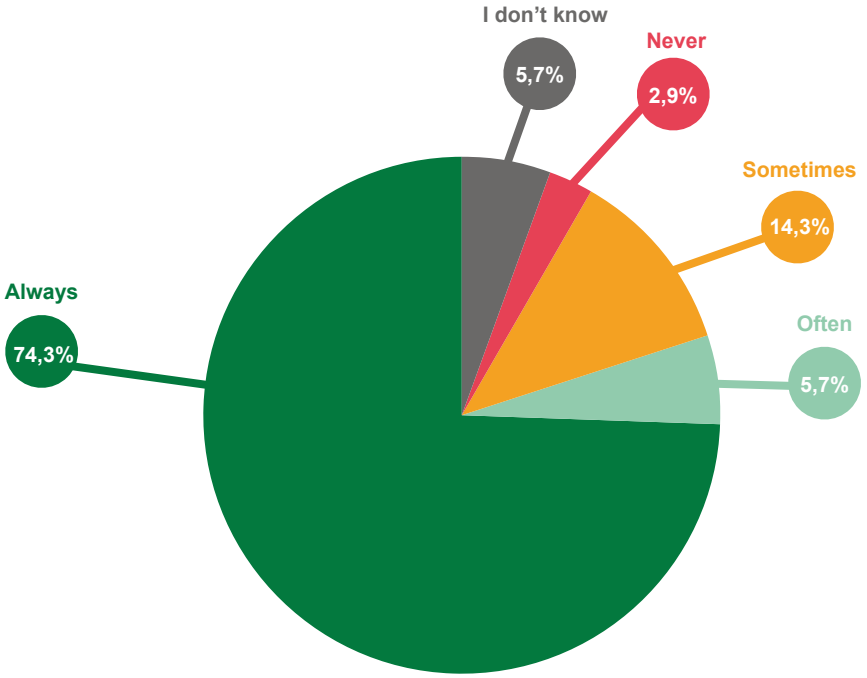
4. ECTS and diploma supplement

The adoption of the European Credit Transfer and Accumulation System (ECTS) introduced a common currency in facilitating the recognition of academic workload and achievement, in promoting mobility and ensuring transparency. It is also a mechanism through which students understand the expectations of the workload. Through using ECTS properly, student-centred

learning is promoted, while creating an enabling framework for flexible learning paths, even more so if non-formal learning opportunities are also using ECTS. The guiding document for ensuring comparable application of ECTS is the User's Guide, last reviewed in 2015 (EHEA, 2015).

In terms of whether study programmes, modules and individual courses are constructed using the ECTS based on the User's Guide, 74% of the national unions of students affirmed this is always the case, while in 6% of cases they said it happens often (Austria and Germany), whilst in 11% of cases this sometimes happens (Bosnia & Herzegovina, Latvia, Moldova, Slovakia) and it is never considered within one country (Belarus).

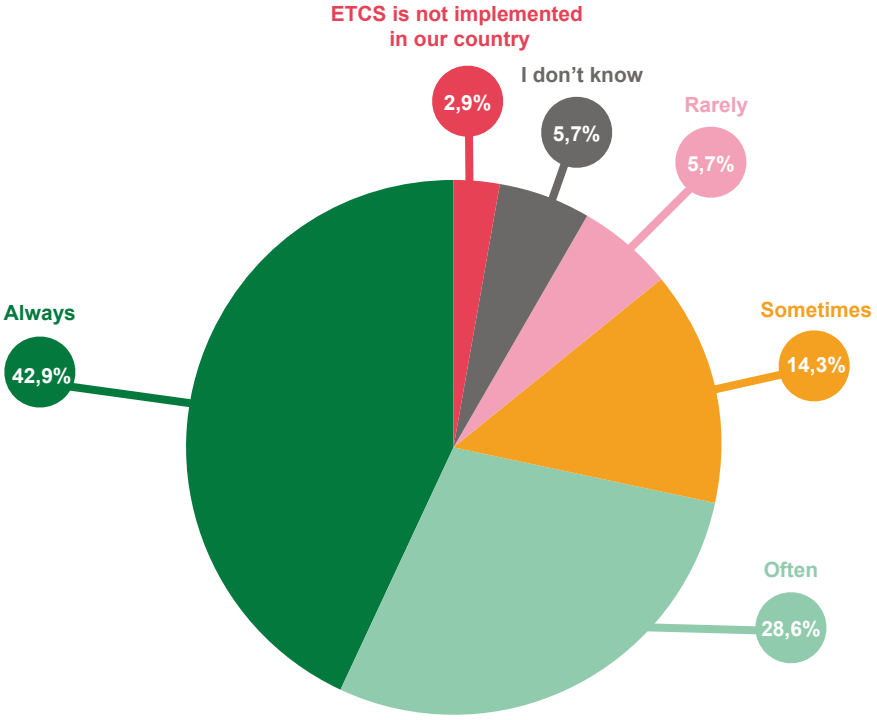
9.7. Frequency of study programs, modules and individual courses being designed based on the ECTS User's Guide



This shows a slight progress from 2020, when the proportion for 'always' constructing the study programmes, modules and individual courses based on the ECTS User's Guide was 71%.

The situation is less encouraging when considering the application of the essential principle of ECTS, having the credits determined based on total student workload for achieving learning outcomes. Only 43% of unions report that this is always the case, whilst in 29% of cases it happens often and in 14% of cases it sometimes happens. Nevertheless, the proportion of unions that report using student workload for achieving learning outcomes as always being the criterion for the allocation of ECTS increased from 24% to 43%.

9.8. Allocation of ECTS on the basis of the total student workload for achieving learning outcomes



In comparison with the 2020 edition of the Bologna With Student Eyes, the percentage of those confirming the adequate application of the principle for calculating ECTS in all or most cases decreased from 76% in 2020 to 72% in 2024. While this is statistically a negligible margin, this points to a stagnation in the field.

Unions report that ECTS are in many cases still calculated in a bureaucratic way, not reflecting the real workload. In these circumstances they tend to be determined based on how relevant professors consider a subject or the perceived difficulty of a subject, without a practical link with the real effort required by students. In other cases the number of classes determines the number of ECTS, or the number of ECTS is determined by dividing the number of ECTS that need to be summed up at the end of the year based on the number of disciplines. In Denmark, DSF mentioned a proposed new reform that would move away from the rule of 60 ECTS per year, which would be detrimental to students. In Latvia, ECTS have been implemented only in 2022, so no evaluations have been done yet.

Asked about how the workload is calculated, the unions from Denmark, Sweden and Moldova mentioned that surveys for students to determine the real workload are in place. In France, the union mentioned that the criterion used is the teaching hours. In Austria, Bulgaria, Czech Republic, Hungary, Romania, Latvia and Slovenia there is an estimation per discipline, while in most cases (17), there is no check-up after the learning and teaching process to see whether the estimation is accurate. The union from Italy points out that all methods are considered (teaching hours, estimations, surveys for students).

According to the User's Guide, the use of ECTS should be regularly assessed and monitored. 22 unions confirmed this is the usual practice, while 4 mentioned that it is not usually the case (Bosnia and Herzegovina, Switzerland, Hungary, Spain) and 8 did not know whether it is a common practice. When the use of ECTS is monitored, in 8 systems it is done by the top-level higher education authority, in 15 cases by the higher education institutions themselves, and in 13 cases by quality assurance agencies through external QA.

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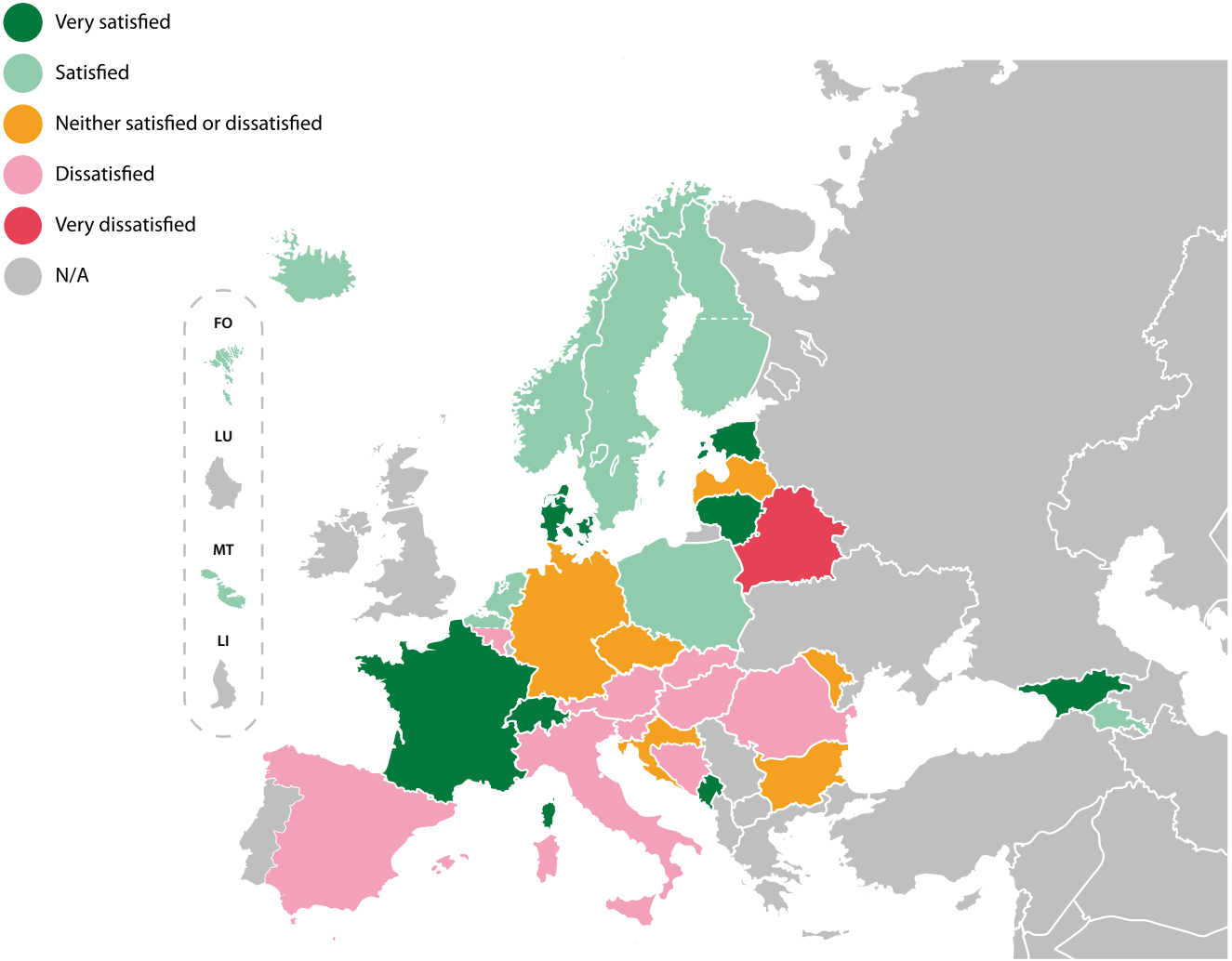
In terms of overall satisfaction levels with the use of ECTS in their higher education system, 20% of unions are very satisfied (dark green), 31% of unions are satisfied (light green), 17% are neither satisfied nor dissatisfied (orange), 26% are dissatisfied (pink) and 3% are very dissatisfied (red). The perception of the unions is captured in the map below. In comparison with 2020, the situation is fairly stable: 50% of the unions were satisfied or very satisfied in 2020, while 51% are satisfied or very satisfied in 2024.

Another tool stemming from the Lisbon Recognition Convention and integrated in the key commitments of the Bologna Process is the Diploma Supplement, which serves the dual purpose of smoothing recognition and informing graduates and third parties of the graduates' learning outcomes and achievements, grading system, courses etc.

Out of the 35 higher education systems considered in this chapter, NUSes point out that the Diploma Supplement is free of charge in 92% of cases, regulated by national legislation and offered automatically in 77% of cases and offered by default in at least two languages in 66% of cases. This shows a slight difference from the data presented in the 2024 Bologna Process Implementation Report, where in 79% of cases all criteria were met.

Despite the possibility to integrate non-formal activities in the Diploma Supplement, e.g., student representation, according to the descriptors agreed within the template adopted in the Bologna Process, there are reports of cases where this is not allowed.

9.9. Satisfaction of the NUS with the implementation of ECTS



5. Recognition and automatic recognition

Recognition stands at the basis of the Bologna Process, as it opens up the entire EHEA to students and graduates and incentivises degree and credit mobility and all the benefits associated with it, as well as the European labour market. Over the past years, several noteworthy advancements in this area have taken place, both within the European Higher Education Area (EHEA), the European Union and on a global scale. The subject gained greater acknowledgement when the General Conference of UNESCO adopted the Global Convention on the Recognition of Qualifications concerning Higher Education (UNESCO, 2019), which entered into force in 2023.

As has been highlighted on several occasions, ESU's view is that recognition of qualifications and study periods in line with the Lisbon Recognition Convention is a fundamental right for students and part of the overall principle of the free movement of persons. A fair, free and timely procedure is a key enabler for a fully-fledged European Higher Education Area. Nevertheless, the sad reality is that students still face several barriers when trying to have their qualifications and study periods recognised in the EHEA. As previously outlined in ESU's Resolution on the Development of Automatic Recognition Processes in Europe (ESU, 2022), a recent situation highlighting this concern involved students escaping the conflict in Ukraine. Ensuring smooth recognition of full and partial qualifications of Ukrainian students took concerted actions of ENIC (European Network of Information Centres) and NARIC (National Academic Recognition Information Centres in the European Union) networks and other parties. This underscores the necessity for additional work even within EHEA.

The recognition process and procedural aspects

In relation to the recognition of foreign qualifications, the unions report that in 17 cases the recognition procedures are handled by the higher education institution themselves, while for 10 cases the recognition is mainly the attribute of top-level authorities or the ENIC-NARIC centres The other 10 unions do not know which is the final decision-making authority in this regard. . This requires different approaches based on the division of competences, which is not the case for credit recognition, which in most higher education systems is the competence of higher education institutions.

The responses from NUSes to the Survey shed some additional light on the perceived effectiveness of recognition procedures in terms of simplicity, non-discrimination, being free of charge, and transparency. The findings provide valuable insights on:

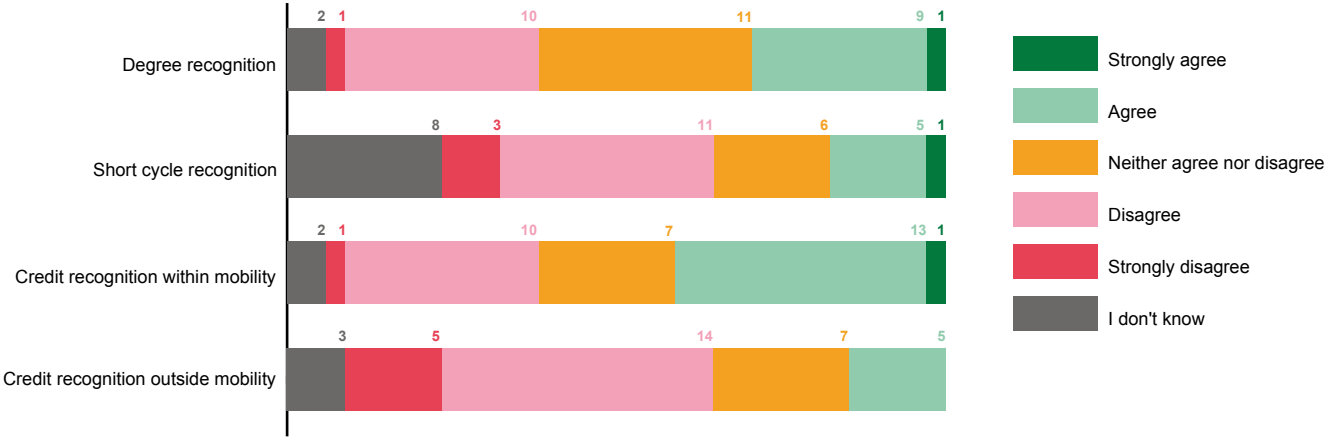
- **Simplicity** - The data suggests a divided stance on the simplicity of recognition procedures. While a significant number of respondents express disagreement (13 unions disagree and 2 unions strongly disagree with it), a noteworthy portion remain neutral (9 NUSes). This indicates a potential need for clearer communication and streamlined processes to enhance the simplicity of recognition procedures. In comparison with the 2020 edition of the survey, when 33% of NUSes agreed that the recognition procedures are simple, this dropped in 2024 to 17%. This can also point to decreased information shared with NUSes with regards to recognition procedures.
- **Free of charge** - The survey highlights concerns regarding the perceived cost associated with recognition procedures. A substantial number of respondents disagree or strongly disagree with the notion that the recognition procedures are free of charge (18 in total). Addressing this concern is crucial to ensure that financial barriers do not hinder access to recognition.
- **Transparency** - Transparency appears to be a positive aspect, with 16 NUSes expressing agreement. This is encouraging, as transparency is fundamental to building trust within the national HE systems. In comparison with 2020, when 41% of NUSes considered the recognition procedures transparent, we observe a a slight improvement, with 46% of respondents finding the recognition procedures transparent in the 2024 edition.
- **Non - discriminatory** - The NUS responses showed a mix of opinions regarding the non-discriminatory nature of recognition procedures. The relatively high number of respondents who neither agree nor disagree (13 unions) suggests a degree of uncertainty or lack of clarity regarding the extent to which recognition procedures are perceived as non-discriminatory. Secondly, a notable number of respondents believed recognition procedures can be discriminatory, which may indicate bias linked to the origin of the qualification or HEI.

9.10. To what extent does your NUS agree that the recognition procedures are...

Thus, the data (see figure above) suggests notable concerns about the perceived complexity and potential financial implications. Regular feedback mechanisms and open dialogue with students can contribute to refining and optimising these procedures to better serve the student community. Despite progress in integrating principles of the Lisbon Recognition Convention, more work is needed to fully implement them in practice.

ESU also analysed to what extent unions agreed that recognition procedures are easy for a student to go through, encompassing degree recognition, short cycle recognition, credit recognition within mobility, and credit recognition outside mobility. To begin with, it is noticeable that, for each category that we will list below, at least 10 unions shared their disagreement with the ease of the procedures.

9.11. To what extent does your NUS agree that the following recognition procedures are easy for a student to go through:



Credit recognition within mobility has been assessed as slightly easier than degree recognition, (despite NUSes pointing out that sometimes HEIs do not equate the ECTS points obtained from foreign degrees as equally valuable as local ones) while credit recognition outside mobility emerged as the most contentious area, with a significant number of students' unions strongly disagreeing. This signals a substantial challenge or dissatisfaction amongst students with the procedures related to credit recognition outside mobility. In comparison with 2020, when 57% of unions agreed that credit recognition within mobility is easy, this has now decreased to 40%.

In regard to the fixed time limit for the issuing of a recognition decision, half of the unions declared that this is not the case. However, there are instances where such time constraints are observed. In Slovakia, the fixed time limit is set at three months, while in Latvia and Bulgaria, it is up to one month.

In Spain, Belgium, and Finland, the limit can extend to six months. Due to the lengthy recognition process, students might miss out on the enrollment deadline. International students with degrees outside EHEA face even greater difficulties, despite the existing ministerial commitment (Rome Communiqué) to apply the LRC principles also to degrees outside the EHEA.

Another issue raised by unions is that interpretation of substantial differences can be subjective. This is further made worse by the fact that in 3 higher education systems there is no appeals mechanism for recognition within higher education institutions (Belgium - Flemish Community, Finland and Romania) or few HEIs have them set in place (Armenia, France, Slovakia). Within 14 HEI systems, appeals bodies for recognition are mandatory by law.

Belarussian students expressed difficulties in obtaining credit recognition after short-term mobility, with a growing trend of non-recognition of diplomas from other countries. For example, the bilateral commitment of diploma recognition with Poland was stopped.

All these problems undermine the effectiveness and fairness of the recognition process, negatively impacting students' educational experience, career prospects, and overall well-being. Missed opportunities, financial burdens, inequitable treatment and bureaucratic challenges demand immediate attention and resolution to ensure a fair and efficient educational landscape for all.

In response to the question regarding the existence of procedures for recognising qualifications of refugees or displaced persons with missing or incomplete documentation of their qualifications, half of the unions declared they are aware of such practices. The absence of recognition procedures for the qualifications of undocumented refugees and displaced persons is a reminder of the barriers that persist, hindering the educational aspirations of individuals grappling with the hardships of forced migration. This issue transcends national borders, reflecting a global challenge that demands collective attention and comprehensive solutions.

In order to regularly improve the recognition process, as well as to address issues stemming from experience and complaints received by the students' unions, we asked NUSes how often they communicated with various decision-makers specifically on recognition topics: ministries of education, ENIC-NARIC centres, individual higher education institutions, national rectors conferences, Erasmus+ agencies and QA agencies. Overall, between 12 to 17 national unions of students communicated at least once per year with each decision-maker on matters pertaining to recognition, with 17 unions answering so for ministries, and 12 unions for ENIC-NARIC centres.

6. Automatic recognition

In the 2020 Rome Communiqué, the ministers of higher education declared that 'We will ensure automatic recognition of academic qualifications and periods of study within the EHEA so that students, staff and graduates are able to move freely to study, teach and do research. We will make the necessary legislative changes to guarantee automatic recognition at system level for qualifications delivered in EHEA countries where quality assurance operates in compliance with the ESG and where a fully operational national qualifications framework has been established.'

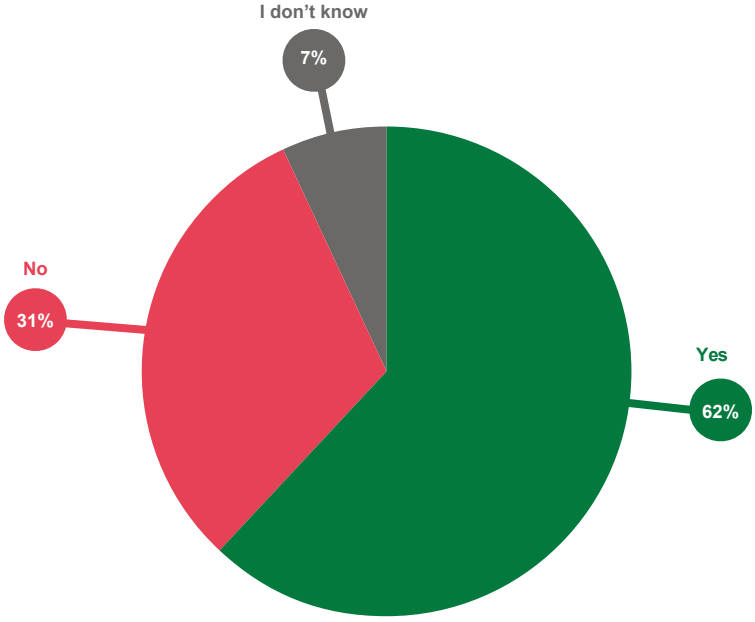
Automatic recognition is defined in Bologna as 'the automatic right of an applicant holding a qualification of a certain level to be considered for entry to a programme of further study in the next level in any other EHEA country'. Despite being first mentioned in the 2012 Bucharest Communiqué, little progress has taken place, until recently, in ensuring automatic recognition.

ESU believes that automatic recognition, underpinned by Bologna commitments, should be an enforceable right of students. It is beyond comprehension that after 25 years of the Bologna Process, the basic minimum trust and knowledge-sharing necessary to achieve automatic recognition are not met. As a clarification, automatic recognition implies exclusively generic recognition of the QF-EHEA level and nature of degree, without any implications in terms of specific recognition (of the content of the degree) or admission to higher education.

In order to ensure automatic recognition and considering its system-level impact, ESU believes this should be dealt with at national level, naturally with admission continuing to be dealt with at institutional level. This would also counter practices of combining generic recognition and admission, including unsubstantiated arguments on the reasons for denial of entry (whether it is because of recognition or other criteria), to which students have no effective means of appeal.

NUSes declare that automatic recognition is in place in 20 higher education systems, among which in 13 systems de facto and unilateral automatic recognition is in place. While de facto automatic recognition maintains most of the features of de jure automatic recognition, the main problem is the lack of certainty and, if needed, legal remedy.

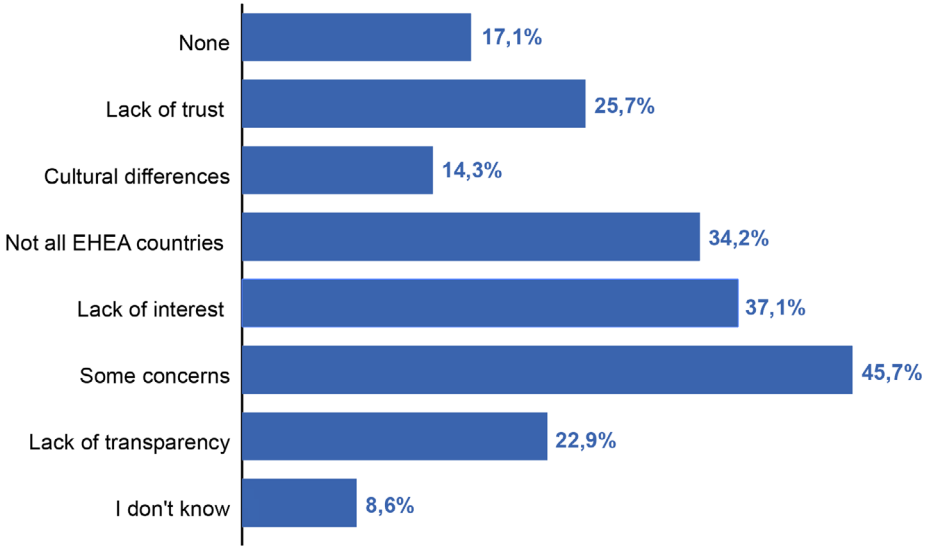
9.12. Implementation of automatic recognition of degrees from other EHEA countries



Looking into whether achieving automatic recognition is important for the national unions of students, 23% of unions believe it is essential, 40% assess this political priority as highly important, 29% consider it of moderate importance, 6% low importance and 3% believe automatic recognition is not important at all. The proportions have remained similar to the previous 2020 Bologna With Student Eyes data collection exercise. Beside the practical implications of making recognition procedures smoother, there is also the matter of principle of guaranteeing a fundamental right for students which should be easily acknowledged if the advancements in implementing Bologna tools are considered and trusted across the EHEA.

As a follow-up question, we looked into why national unions of students believe automatic recognition is not in place yet.

9.13. Perception of main barriers for the implementation of automatic recognition in the EHEA



After the option pointing out concerns regarding regulated professions (16 national unions of students), the most common barrier is political rather than technical: a lack of interest by governments (13 national unions of students). These are followed by the misapplication or only apparent application of EHEA tools in member states (12 answers) and a lack of trust between member states (9 answers). Particularly, 6 unions answered that they do not understand why automatic recognition is not already in place. Notably from the previous Bologa With Student Eyes publication, the number of NUSes mentioning the lack of implementation of key commitments fell from 49% to 34%, while the lack of interest from member states slightly increased from 35% to 37%.

The lack of interest is stark considering the potential benefits that automatic recognition may entail not only for students (less time and costs, less bureaucratic procedures, more certainty and incentives to take advantage of mobility opportunities), but also for the public authorities (increased attractiveness - in case of mutual recognition practices, less costs, more internationalisation, easier access to the labour market for skilled individuals).

IV. Key takeaways and policy recommendations

Without meaningful and full implementation of the key commitments, not only the European Higher Education Area cannot be complete, but also the commitment to the whole process, as well as to different or developing policy areas is questionable if the 'basic points' are not met. As sufficient time has passed and adequate support measures have been in place, there is no reason for any country to justify delay.

In terms of the normative integration of the principles, policies and tools underpinning the key commitments in the EHEA, the situation has steadily improved in recent years. However, as this chapter reports, this does not imply either full, or meaningful implementation of the key commitments. It may be the case, such as for ECTS, that practically all HEIs are expected to, and are, using the ECTS User's Guide, but the way the ECTS are determined is still, de facto, not in line with the Guide. It can also be the case that the principle was sometimes translated improperly (or only on the surface), i.e., introducing inflexible conditions for degrees or a division between bachelor and masters programmes that does not make sense for students.

Therefore, before analysing whether translating key commitments in national legislation has produced a paradigm-change and were properly translated into practice, it is important to assess whether the whole core of the key commitment has been taken into account. The key commitments are built upon and rely upon each other, and as such a lack of full application of one can create an improper application or lose the full potential value of other components in the structure.

The fact that the key commitments are not fully implemented (or at least perceived to be not implemented) by member states is shown in the reluctance of some member states to move towards automatic recognition, which includes as criteria the fulfilment of the key commitments.

At higher education institution level instances of not using automatic recognition are observed. Other instances entail burdensome recognition processes where substantial differences are equated to any type of difference. This can either show a lack of information on or proper understanding of Bologna tools and how they foster trust, or a lack of trust altogether, because those who need to practice recognition do not perceive the Bologna Process commitments sufficiently implemented in practice abroad, or even worse they rely on subjective impressions of quality of education abroad.

This can also be evidenced by the expansion of regional agreements (particularly Baltic-Benelux), which - while each agreement is in itself a welcome development - shows that the perception is that not all countries are fully implementing the key commitments, that they are unwilling to move towards full automatic recognition or are unfamiliar with other countries' degrees in a sufficient manner. The ENIC-NARICs have an essential role to play here, through their socialisation and knowledge-gathering and sharing.

In the Bologna Process, the method determined to support implementation was the creation of the Bologna Implementation Coordination Group and three thematic peer groups for each commitment. Whilst being welcome entities dedicated to supporting the implementation of the Bologna Process' key commitments, they have some structural shortcomings: countries can opt out or not attend meetings, choose not to present implementation plans, and propose plans without the involvement of stakeholders or with little follow-up. The level of stakeholder participation can be a shortcoming in the implementation phase as well. More thorough implementation processes

should be in place, especially through the creation of public implementation plans for each cycle, designed, implemented and monitored together with stakeholders.

Recommendations for the key commitments addressed to public authorities:

- Regarding the degree structure:
  - Reassess the division of content for bachelor and masters programmes, in order to ensure their coherence and relevance for students.
  - Make use of one of the intended purposes of the three-cycle system by promoting more flexibility between learning pathways, as well as permeability with VET.
  - Better integrate the short-cycle in the degree structure and improve the information provision towards students.
  - At Bologna level, revisit the work on the commitment related to clarifying the nature, scope and structure of masters degree programmes.
  - Abolish penalties for not finalising the degree in the expected timeframe.

- Regarding qualifications frameworks and learning outcomes:
  - Involve stakeholders in the design/assessment of the national qualifications frameworks (NQF) and better explain their role to students and employers.
  - Support higher education institutions in writing learning outcomes that are adequately linked to the descriptors of the NQF and are used for assessment. Consider whether AI and other digital tools could support an efficient and consistent formulation and assessment of learning outcomes.
  - Continue work on better integrating microcredentials into the NQF.
  - Improve the use of the NQF for non-formal and informal learning and recognition of prior learning.
  - Priorities within Bologna structures work on the full implementation of learning outcomes.

- Regarding ECTS and the Diploma Supplement
  - Revise the ECTS User's Guide in order to fine-tune elements based on practice and include new trends such as microcredentials.
  - Improve the monitoring of the determination of ECTS through external QA and, for mobility, through the Erasmus Charter for Higher Education monitoring.
  - Calculate ECTS according to the real workload.
  - Ensure that national legislations implement the template for diploma supplement, in line with EHEA commitments, which also includes non-formal activities.

- Regarding recognition
  - Ensure user-friendly recognition procedures, including through offering information in a widely spoken European language besides the national one, accessible information and clear time limits.
  - Support HEIs in their work on recognition, including with the interpretation of substantial differences.
  - Collect additional data on recognition practices and decisions, including reasons for denying recognition, appeals and their result .
  - Member states should ratify the Global Recognition Convention and apply the LRC principles to degrees from outside the EHEA.
  - Promote automatic recognition and move towards generic recognition of degrees at system-level.
  - Promote the use of the European Qualifications' Passport for Refugees and availability of learning paths for refugee students.
  - Promote timely recognition and valorisation of ECTS in learning mobility, both within Erasmus as well as other mobility programmes, including recognition of courses outside of the learning agreements.

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Learning and teaching

I. Introduction

Learning and Teaching sits at the heart of higher education, representing the first mission of higher education institutions and the most direct experience for students in higher education. The degree to which learning and teaching are valuable and qualitative for students determines the achievement of the purposes of higher education and whether the outcomes for which students seek higher education are met.

Most of the policy goals in higher education, from the social dimension to internationalisation, impact and rely upon functioning learning and teaching processes. These processes, in turn, are primarily determined at the institutional level or even more directly through interactions between students and teachers.

Indeed, the learning and teaching policies are embedded in the core understanding of institutional autonomy, which implies less of a national drive or predetermined direction. However, this does not mean that the public authority can or should do nothing to increase the quality of learning and teaching processes. On one side, the quality assurance mechanisms, ensuring minimum quality standards, go in this direction by prescribing expectations related to learning and teaching. While European and national QA frameworks do not interfere with the content of the learning and teaching processes, they do set standards for their organisation. Countries set up strategies to support the delivery of quality learning and teaching, funding different initiatives and setting requirements and conditions to guarantee adequate learning and teaching, for example, through requirements for initial or continuous professional development for academic staff involved in learning and teaching.

The growing demand for higher education has resulted in an increased participation and greater diversification of the student population, including international students and lifelong learners, which requires adaptive approaches to learning and teaching. The new generations of learners enter higher education with new learning patterns shaped by a changing society and culture. The changing landscape of society has also impacted the learning process due to globalisation, digitalisation and AI, and new expectations regarding skill demand. All these require a trained staff

who can adjust the learning and teaching process and new policies at institutional and national levels to shape the regulation, funding and infrastructure related to teaching and learning.
Several projects and initiatives supported the development of learning and teaching and student-centred learning (SCL) in Europe, such as ESU's Time for Student-centred learning project - T4SCL (2009-2010), Peer Assessment for Student-Centred learning - PASCL (2013-2016), the Toolkit for students, staff and higher education institutions (ESU and Education International, 2010) or more recently EUA's Leadership and Organisation for Teaching and Learning at European Universities - LOTUS project (2020-2022). Other successful fora for debating and sharing learning and teaching practices are the European Learning & Teaching Forum organised by EUA since 2017, and its Learning & Teaching Thematic Peer Groups.
ESU understands SCL as 'both a mindset and a culture [...] characterised by innovative methods of teaching which aim to promote learning in communication with teachers and other learners and which take students seriously as active participants in their own learning, fostering transferable skills such as problem-solving, critical thinking and reflective thinking' (ESU, 2015).
In 2022, ESU adopted a Statement on the future of student-centred learning (ESU, 2022), taking stock of developments in the EHEA and how student-centred learning should adapt to a changing landscape. ESU points out that 'the risk is high of putting any reform in the basket of implementing SCL, even though it is more lip service than a systemic change'. Apart from the lack of required ambition in achieving student-centred learning, the statement points out interlinkages with new trends, such as micro-credentials, transnational cooperation, European university alliances and digitalisation.

We highlight that as European HE becomes even more interconnected and cross-border, relying solely on the capacity to implement SCL at the institutional level proves to be less realistic, and we recall that the surrounding policies on higher education inherently alter SCL as a meta-concept. Already since 2010, ESU has been signalling the effect of austerity on funding policies in the implementation of SCL.

In its 2022 statement on SCL, ESU takes on the conceptual framework proposed by Klemenčič (Klemenčič, 2017) that includes three layers of SCL: as a pedagogic concept to foster individual learning, as a cultural frame for developing communities of learning and as a lever supporting learning systems to achieve student agency. For ESU, SCL includes the pedagogical paradigm, streamlined and learning outcomes-oriented assessments, teacher development, flexibility of learning paths, meaningful and decisive student participation, learning environment and resources and student support measures.

Digitalisation and the surge in the application of Artificial Intelligence tools in higher education are expected to have a clear long-term impact on learning and teaching. While the benefits and pitfalls of digitalisation have been thoroughly documented, we are still in the early stages of understanding how AI will shape education and, implicitly, the student experience.

II. Bologna commitments

In the initial phases of the Bologna Process, the subject of learning and teaching was not directly addressed. However, Bologna Process policies affecting learning and teaching, such as qualification frameworks, ECTS, and learning outcomes, as well as the creation of comparable and compatible quality assurance standards and practices at the European level, have all significantly impacted learning and teaching.

As outlined in the historical overview of SCL in the EHEA, which is included in the Statement on the future of student-centred learning (ESU, 2023), the first mention of student-centred learning in the Bologna Process came with the London Communiqué in 2007. In the Leuven/Louvain-la-Neuve Communiqué (2009), the first outline of the core features of SCL is presented as a 'development of more student-centred, outcome-based learning', empowering students through new approaches to learning and teaching, support and guidance structures, curriculum based on learning outcomes, and flexible learning paths. In line with ESU's perspective on SCL, the Bologna Process acknowledged that SCL is not merely a pedagogical concept but has a more profound and intimate link with the education system as a whole. At this point, SCL also became directly linked with other policy objectives of the EHEA (e.g. learning outcomes).

The Bucharest Communiqué (2012) further included innovative teaching methods, as well as student participation in governance structures at all levels as a precondition to SCL. The Yerevan Communiqué (2015) resulted in the most extensive expansion of the SCL content, including digitalisation as a tool for SCL, assessment methods, as well as full student involvement in curriculum design and quality assurance. During the Yerevan ministerial conference, a landmark achievement for ESU was the inclusion of SCL in the revision of the Standards and Guidelines for Quality Assurance in the EHEA (ESG) (ENQA et al., 2015), both as a specific indicator for internal QA (Indicator 1.3) and as a transversal principle across indicators and guidelines.

In the Paris Communiqué (2018), ministers agreed to 'add cooperation in innovative learning and teaching practices as another hallmark of the EHEA'. Finally, the Rome Communiqué (2020) has proven to be a very ambitious one for ministers in terms of policies for learning and teaching. Ministers committed to an EHEA which 'will encourage creativity, critical thinking, free circulation of knowledge and expand the opportunities offered by technological development for research-based learning and teaching, through 'new and better-aligned learning, teaching and assessment methods and practices, closely linked to research'. They emphasised that 'Flexible and open learning paths, part of the original inspiration for the Bologna Process, are important aspects of student-centred learning and are in increasing demand in our societies.' For this, they adopted Annex III of the Communique, 'Recommendations to National Authorities for the Enhancement of Higher Education Learning and Teaching in the EHEA', the most comprehensive policy document adopted at the EHEA-level focused on learning and teaching.

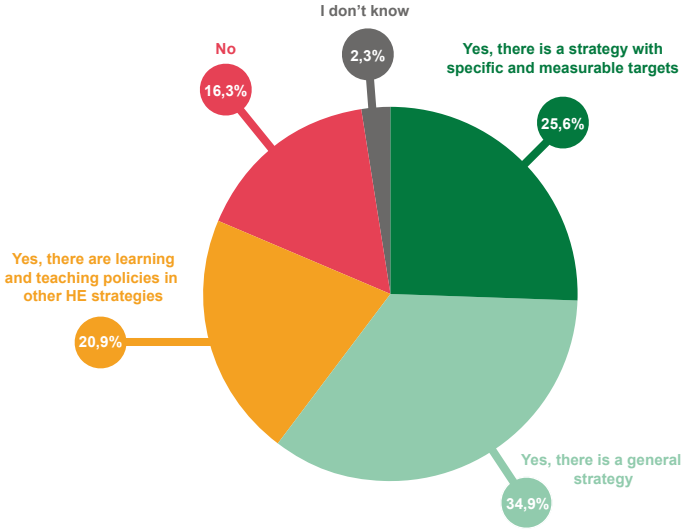
The recommendations to national authorities concentrate on three topics: making student-centred learning a reality, continuous enhancement of teaching and strengthening higher education institutions' and systems' capacity to enhance learning and teaching. All three have been expanded through indicators and policy orientations by the Bologna Process Working Group on Learning and Teaching in the 2020-2024 cycle, especially considering student-centred learning and staff development, additionally focusing on the ethical use of AI and innovative/transformative learning and teaching policies, according to the Report of the working group (EHEA, 2024).

III. Analysis of Bologna commitments implementation

The first question that ESU asked national unions of students in its 2024 Bologna With Student Eyes survey is whether there is a national/top-level strategy on the enhancement of learning and teaching in higher education. According to the responses provided by NUSes, in 25.6% of cases, there is a strategy with specific and measurable targets, in 34.9% of cases there is a general strategy, in 20.9% of cases there is no strategy dedicated to learning and teaching, but objectives are included in other higher education strategies, while in 16.3% of cases there are no national objectives related to learning and teaching.

ESU believes it is important to have such national strategies, while not stifling innovation and trial-and-error approaches. These strategies should tackle both long-standing issues (adequate infrastructure, flexible learning paths, professional development for staff, support systems for students, mentoring and counselling), new trends (digital approaches and AI, microcredentials) and particular approaches (work-based learning, increased need to integrate sustainability and democratic competencies).

10.1. Existence of a top level strategy on the enhancement of learning and teaching in higher education

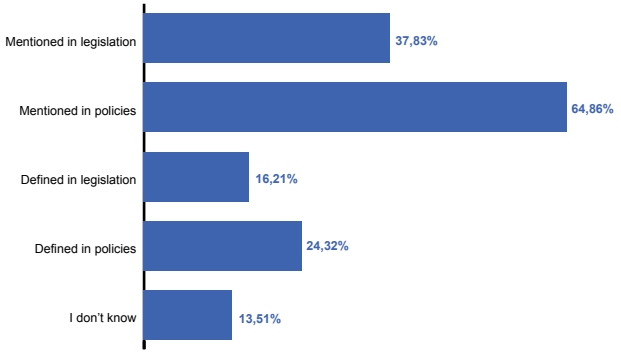


One key element, apart from the existence of strategic objectives, is whether there are incentives and support for the implementation of strategies through funding. Considering the large gap in capacities between higher education institutions, sustainable public funding in learning and teaching is essential to not widen the disparities and leave higher education institutions behind in the integration of new tools and technologies. Out of the 37 national unions of students answering the survey, 14 mentioned there is some type of funding at national level earmarked for learning and teaching policies, 16 affirmed there is no such funding available and 7 did not know.

For the learning and teaching strategic objectives, where they exist, in 18 of cases national unions of students were involved in their creation, while roughly the other half of respondents were not.

The next area we delved into is in relation to student-centred learning. While in the Bologna Process there is no formal definition of student-centred learning, its content as a concept is clear through the policies that have been included under its umbrella, as mentioned in the previous section on Bologna commitments. However, at the national and institutional level, a more clear notion needs to be operationalised in order to ensure smooth implementation. Therefore, ESU asked the national unions of students whether student-centred learning is mentioned and defined in the national legislation or policies on learning and teaching. In 24 higher education systems, SCL is mentioned in national policies, while in 14 it is mentioned in legislation. Consequently, when referring to whether the concept is defined, in 9 systems SCL is defined in policies, while in 6 cases it is defined in the national legislation. Finally, 5 unions did not know.

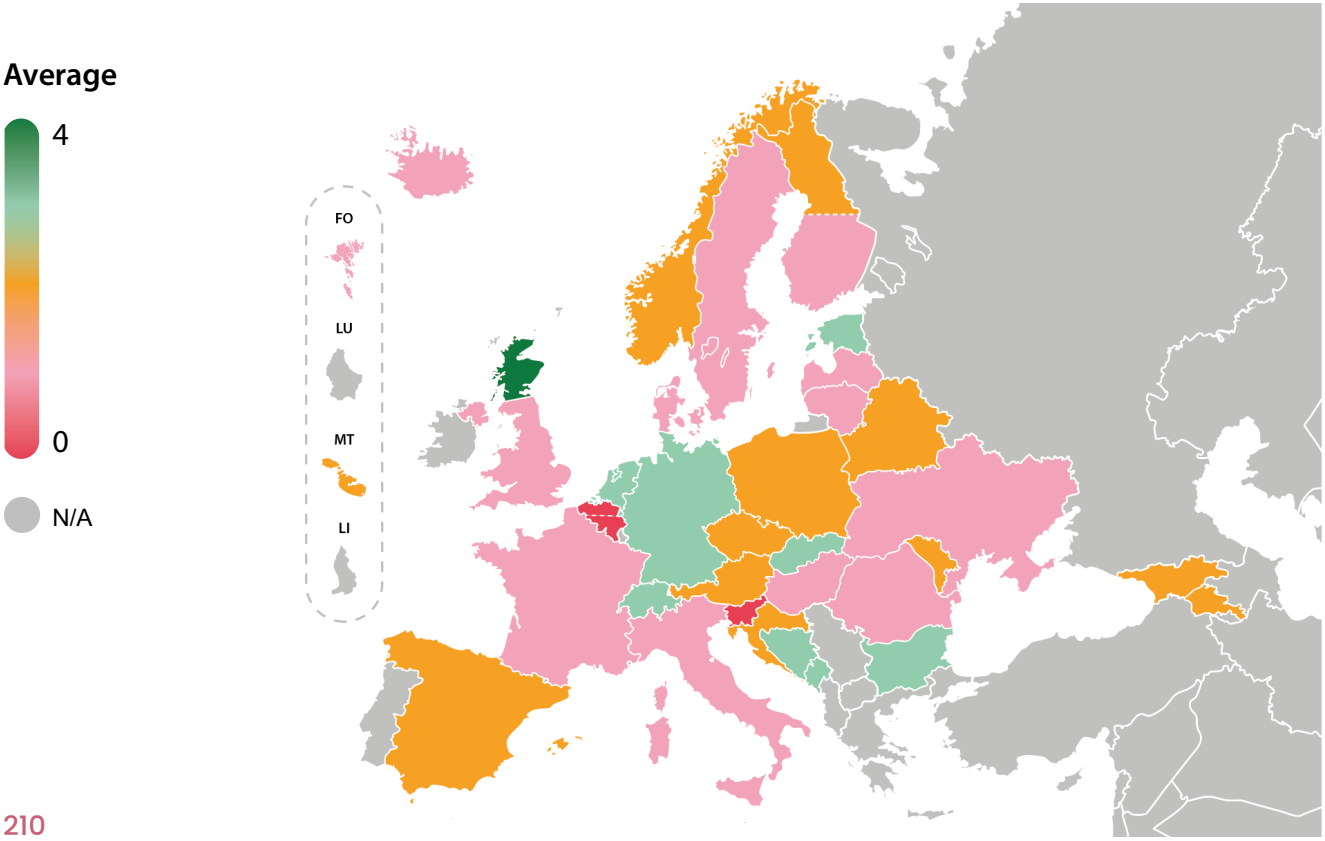
10.2. Recognition of student-centred learning in national legislation and policies



In order to grasp the prioritisation of learning and teaching policies, ESU created a scorecard indicator where one point for each of the following indicators is attributed:

- strategic objectives on learning and teaching was given **1 point**
- concrete targets on learning and teaching was given **1 point**
- earmarked funding for learning and teaching was given **1 point** and
- promotion and definition of student-centred learning in national legislation or national policies was given **1 point**.

10.3. Learning and teaching policies - scorecard indicator

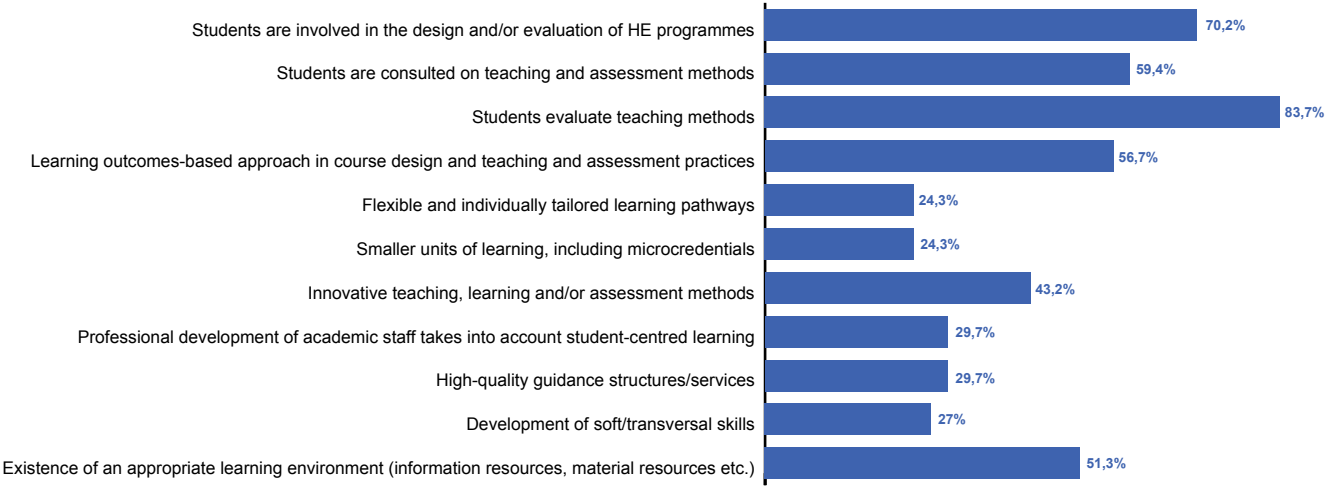


There is only one higher education system that meets all 4 criteria and is marked with dark green: Scotland. 8 other higher education systems achieve 3 out of 4 criteria and are marked with light green as well (Netherlands, Germany, Switzerland, Slovakia, Estonia, Bosnia and Herzegovina, Montenegro and Bulgaria) . Other 12 systems are labelled in orange (2 out of 4 criteria), 13 systems in pink (1 out of 4 criteria) and in three higher education systems the national unions of students report that no indicator is met (Belgium – French Community, Belgium – Flemish Community and Slovenia).

This sheds light to the fact that more effort is needed to translate Bologna commitments in learning and teaching, old and new, into reality.

Furthermore, in order to grasp a better understanding of what policies are actually included in the understanding of SCL and promoted at national level in the name of student-centred learning, we asked NUSes which of some of the most defining elements of SCL are enacted in their systems.

10.4. Implemented policies on student-centred learning



Also part of a different commitment related to quality assurance, the two most common practices are the evaluation of teaching methods (83,7%) and the participation of students in the design and/or evaluation of study programmes (70,2%). The results of the survey show that policy priorities regarding student-centred learning are present in less than half of HE systems in Bologna. In relation to the evaluation of teaching methods, the most selected option, the student union from Slovakia stated that 'it is such an evaluation that only a few HEIs might even read it, and of those few, they just discard and really do not change something based on those results'. These practices are not confined to Slovakia only.

The following policies relate to students being consulted on teaching methods, learning-outcomes based approaches in course design and assessment, learning environment infrastructure conducive to SCL and promotion of innovative learning and teaching practices. A notable issue is the lack of clarity surrounding the idea of 'innovative practices'. This lack of clarity can lead to setting standards that are either too lenient or too stringent when defining what truly qualifies as 'innovation'

In relation to learning-outcomes designed for study programmes, unions mention that in 22 cases this is required by legislation, while in 3 higher education systems all study programmes are voluntarily designed with the learning outcomes as their basis. In 4 higher education systems (Bulgaria, Switzerland, Italy, Netherlands) learning outcomes are often the basis in designing study programmes, while in 5 systems (Estonia, Latvia, Moldova, Malta, Slovakia) this happens only sometimes. 3 unions (from Belgium – French Community, France and Iceland) did not provide an answer on this question.

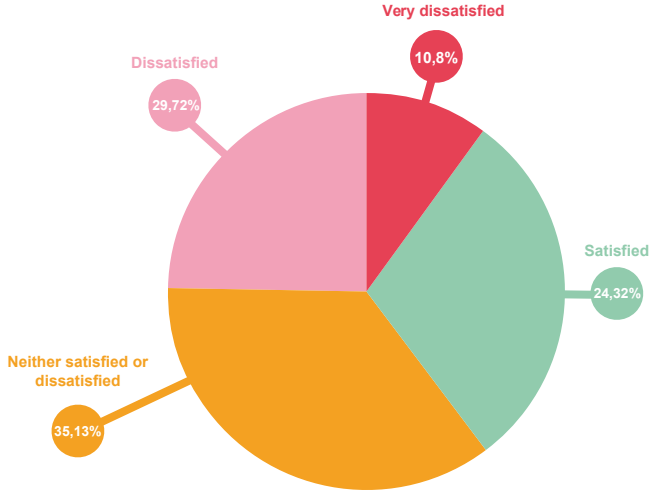
The current draft Bologna Process Implementation Report (BPIR) (EHEA, 2024) data shows that top-level requirements and regulations on using learning outcomes exist in 44 out of 46 surveyed higher education systems. The BPIR mentions that in two cases (Kazakhstan and United Kingdom - England, Wales and Northern Ireland) there is no binding legislation on using learning outcomes, while data collected from ESU's national unions of students further shows that learning outcomes are not systematically implemented in these higher education systems .

Regrettably, high-quality guidance services and professional development opportunities for staff are included in only 11 higher education systems, while integrating microcredentials in student-centred learning policies and promoting flexible learning pathways are linked to SCL in only 9 higher education systems.

Overall, these policies should also be considered in the implementation of internal and external QA, according to the ESGs. Based on the answers provided by the national union of students, SCL is always considered in internal QA in 11 of higher education systems, it is considered often in 12 systems and sometimes in 9 systems. 2 unions (from France and Belgium – French community) consider that SCL is rarely considered in internal QA exercises, while one union (from Belarus) considers this is never the case. As a main policy process to improve SCL, including by a structured participation of students and other internal stakeholders, more attention should be put into transforming the standard of the ESGs on SCL into practice through holistic approaches of HEIs.

All of the information provided above feeds into the perception of satisfaction of the national unions of students related to the implementation of student-centred learning in their higher education systems. Overall, 24% of NUSes are satisfied with the implementation of SCL, while 41% are either dissatisfied or very dissatisfied. In between, 35% of unions are neither satisfied or dissatisfied with the implementation of SCL. This shows that the topic requires significant attention from both HEIs and public authorities.

10.5. Student satisfaction on the implementation of student-centred learning



The Covid pandemic had a strong impact on learning and teaching policies. Due to an unforeseen emergency, learning, teaching and assessment, as well as the practical work had to be moved online. Despite previous calls for enhanced digitalisation and resilient digital infrastructure, many higher education systems turned out to be unprepared for the full-scale transition to emergency online education. Since in the last 2020 Bologna with Student Eyes report, the measures related to the Covid pandemic were still in full-stream, we asked unions to analyse retrospectively in this edition what changed during Covid times in learning and teaching, and how many of those changes still impact the system.

The most relatable point for most of the unions was the adjustment of policies at the national level to cater to online learning, as well as to allow more flexibility for the delivery of the study programme and for the progression of students: for example, in Belgium, Flemish Community, students who

failed the exams could retake them. Other regulations or voluntary actions from higher education institutions were related to improving academic staff's digital skills.

Dedicated funding for learning and teaching was provided in several countries: Spain used EU funds for digitalisation. Governmental funding for digital infrastructure of HEIs was offered in the Czech Republic, United Kingdom and Slovenia. Finland's government supported students and HEIs with funding for wellbeing, counselling and guidance. In the Netherlands dedicated funding was allocated to make sure that students don't get behind on their studies, and could still do an internship. Norway offered funding for student assistants. In the case of Sweden, SFS reports that top-up core funding has been allocated that could be used for learning and teaching, but not exclusively. In UK and Finland, NUS UK and SYL report that a policy priority has been to ensure the mental health of students, while some unions report guidance offered by ministries. Furthermore, some unions have raised concerns regarding the insufficient support provided for using online learning tools, despite expressing the need for such assistance.

Based on the answers received from the National Unions of Students, it is evident that some measures taken during Covid still have an impact today. Most unions attribute this impact to the existing flexibility in legislation in using digital tools in study programmes delivered in person (such as for communication, assignments or recording the classes) or for blended/online learning formats. ÖH, the union from Austria explains that an accompanying document to the newest Austrian GUEP 2023-2030 ('Gesamtösterreichischer Universitätsentwicklungsplan', the national policy in regards to the development of universities in Austria), published end of 2022, focuses on digitalization: 'Universitäten und Digitale Transformation im Jahr 2030' (universities and digital transformation in the year 2030). VVS also pointed out that online assignments are still a practice used within the educational system.

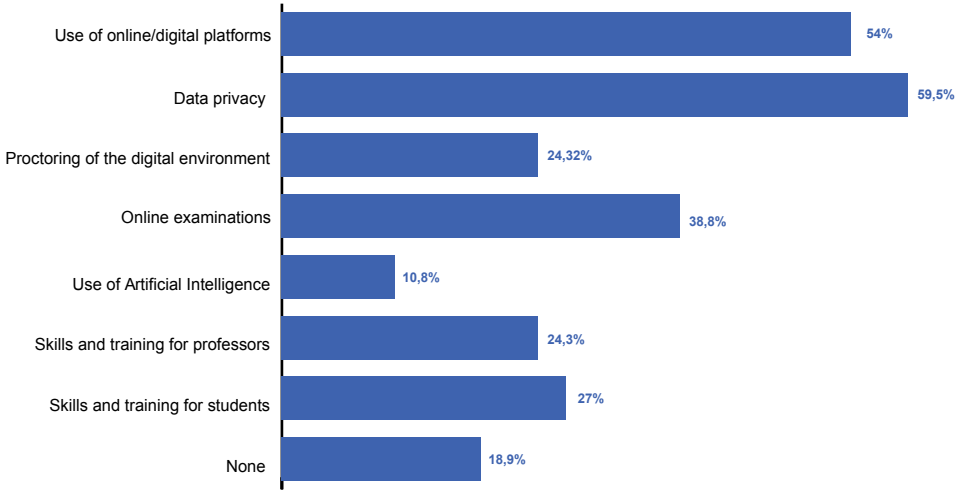
In Finland, SYL mentioned that HEIs have independently implemented policies on distance and hybrid teaching. While no national policies have been implemented, there has been a significant amount of national interest in the pandemic's effect on the wellbeing of students and young people as well as in implementing new learning environments. The National Union of Students from the

United Kingdom highlighted the existing digital divide in accessing online tools and environments for disadvantaged students, changes in the paradigm of assessment and the development of immersive learning experiences using virtual reality (VR) and augmented reality (AR) technologies. Finally, CSC from Croatia mentions the possibility of undergoing online examinations when sick or absent, while UDU from Italy notes that there has been a harsh drawback on digital methods by HEIs after the end of the Covid-19 pandemic.

In overall terms, when looking at the degree of satisfaction related to the current use of digital tools in learning and teaching at national level, 19% of the national unions of students are satisfied, while 35% are either dissatisfied or very dissatisfied. Most of them, 43%, are neither satisfied nor dissatisfied. The latter figures show an ambivalence; while progress has taken place in recent years, there is a need for further work to embed the full potential of digital tools.

Acknowledging the fast pace of changes in embracing (or reacting to) disruptive technologies, such as artificial intelligence, ESU has taken the pulse on the status quo related to national policies on different types of digital tools, as of June 2023 (see figure presented below).

10.6. National policies related to digitalisation in learning and teaching



Data privacy and security is the area with most national policies in place (59.5%), with many EU countries having regulations related to the application of the General Data Protection Regulation. The next categories are regulations on using digital tools and platforms (54%) and online examinations (38.8%). The use of artificial intelligence is regulated by 4 higher education systems.

Considering the digitalisation of learning and teaching, ESU's views are encapsulated in the contribution to the digital education package (ESU, 2022), while for Artificial Intelligence ESU has adopted in 2023 an overarching and encompassing statement related to AI in higher education (ESU, 2024).

In relation to the use of AI in education, several policies are taking shape, from the work of UNESCO (starting with the Beijing Consensus well ahead in 2019), to Council of Europe (a legally binding instrument on the use of AI in education, focused on its implications for human rights and democracy) or the European Union (the AI Act, which designates the use of AI in education as a high-risk medium and puts several guardrails in place). In the Bologna Process, the Working Group on Learning and Teaching worked on recommendations for the ethical use of digital tools and AI.

In the Statement on Artificial Intelligence, ESU mentions that:

- the lack of adequate information about what AI is and what is not has been leading to hazardous interpretations of its impact, that spans across seeing AI as a universal solution to all higher education problems and its full-scale transformation to a dystopian alternative of an AI takeover.
- it advocates for a balanced, nuanced, and pragmatic approach to Artificial Intelligence, that puts the student and its interests in the centre. As a neutral tool, support in deploying AI for enhancing adaptability, innovation, accessibility, and quality should come in hand with a precautionary approach towards its pitfalls and how they can be prevented.
- AI could bring meaningful support to the learning and teaching processes and the higher education policies in general if adequate strategies and measures are in place. The rapid growth of AI also calls for resilient systems that could both take advantage of and also be adaptive to disruptive developments, while protecting students.

IV. Key takeaways and policy recommendations

The transformative changes in society, in the patterns of learners, the emergence of new trends and tools to enhance learning and teaching, the need to readjust the methods to achieve learning outcomes and to guide students in their learning path seem to all move faster than national policy responses in many EHEA countries.In many cases the degree to which progress is demonstrated depends, our unions highlight, mostly on institutional practices and capabilities.

According to our national unions of students, in 11 higher education systems there is a national strategy for learning and teaching with concrete and measurable targets, while 14 unions mentioned there is some type of funding at national level earmarked to learning and teaching policies. For the learning and teaching strategic objectives, in half of the cases national union of students was involved in their creation. This shows that in some cases there is little coordination on how higher education will tackle the challenges it faces in terms of learning and teaching practices.

In 24 higher education systems SCL is mentioned in national policies, while in 14 it is referenced in national legislation. Consequently, when referring to whether the concept is defined, in 9 higher education systems SCL is defined in policies, while in 6 cases it is defined in national legislation.

In some cases, member states or higher education institutions implement the concept of SCL or have policies which resemble this paradigm without referring to or defining SCL. Nevertheless, in some cases, it is believed that SCL is too broad of a concept. ESU believes that the concept of SCL is by no means incompatible with the internal coherence of the concept, as well as the capacity to develop systemic or specific indicators to assess whether SCL is implemented. ESU believes that SCL is not only a broad enough concept that can adjust to the current and future realities, but that resilience through reflexive analysis and how teaching and learning processes and environments react to internal and external factors are built-in features of SCL. ESU considers that SCL, as it is currently understood, still serves its purpose, and its broad vision can encompass the new tendencies and challenges within European HE.

Within the Bologna Process, the evaluation of teaching methods and student participation in program design/evaluation are the two most common practices of student-centred learning. While these practices are closely linked to quality assurance requirements they are not always considered within the internal quality assurance of higher education systems.

In order to achieve successful learning and teaching policies, staff development is key. High-quality guidance services and professional development opportunities for staff are included in only 11 higher education systems, while in other cases it exclusively depends on higher education institutions themselves, which may not have sufficient resources to both offer and require completion of sufficient training opportunities.

Overall, 24% of NUSes are satisfied with the implementation of SCL, while when looking at the degree of satisfaction related to the current use of digital tools in learning and teaching at the national level, 19% of the national unions of students are satisfied. Few national systems have already put in place regulations related to the use of Artificial Intelligence in education.

Considering the analysis presented within this chapter ESU puts forward the following main recommendations:

- Boost implementation of the recommendation to enhance learning and teaching within EHEA (Annex III of the Rome Communique), including through concrete action plans.
- Create national learning and teaching strategies, with related targets and funding objectives, which include ways to adequately integrate digital tools and adapt the learning pathways to ensure their flexibility.
- Focus more on learning outcomes related to soft and transversal skills and critical thinking.
- Ensure that microcredentials are conceived student-centred, seamlessly integrated throughout the student life-cycle free from any unnecessary fragmentations
- Work in the next Bologna cycle on the understanding, operationalisation and implementation of student-centred learning considering new trends and old commitments, including through thematic peer learning activities.

- Work both at national and European level on a common approach to implement AI, looking into how AI impacts current EHEA commitments, key commitments and Bologna tools and learning and teaching approaches.
- Better support the role of counselling, guidance and mentorship for students in order to be able to take informed decisions about their learning choices and career paths.

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Internationalisation and mobility

I. Introduction

'In 2019, there were more than 6 million tertiary international mobile students around the world. This is almost 3% of the total number of tertiary students.' (UNESCO Institute for Statistics, 2022). In the last two decades, the proportion of students who pursue their higher education outside their home country has tripled (ibid.). Internationalisation and mobility are indispensable for fostering intercultural understanding and cooperation among higher education, providing students with numerous opportunities such as to expand their professional networks, to gain exposure to new cultures and to improve their employment prospects. Mobility and internationalisation are additional advantages for higher education institutions. These initiatives facilitate higher education institutions in enhancing their appeal to international students, developing fresh collaborations with foreign higher education institutions, and improving the calibre of their instruction.

Notwithstanding the manifold advantages of internationalisation and mobility, a large number of students continue to encounter obstacles pertaining to mobility. The aforementioned obstacles consist of financial constraints, linguistic barriers, inadequate information, prejudice, insufficient support from the host institution, and non-recognition of higher education institutions credits obtained overseas.

Thus, ESU inquired with its membership the status of implementation of Bologna commitments pertaining to internationalisation policies, incoming and outgoing mobility, support for and access to mobility, and barriers to engage in mobility schemes.

II. Bologna commitments

Even though the most known initiative known not only in Europe but around the globe is the EU's Erasmus+ programme, mobility and internationalisation have been components amongst the wider Bologna Process community, with Erasmus+ being one of several initiatives that support the goals of the EHEA. To this end, the progressing internationalisation of higher education on a global level has accelerated student mobility within and beyond the European Higher Education Area, giving mobility

growing in significance, regardless of nationality. Already the 1999 Bologna Declaration emphasised the significance of establishing a 'European area of higher education as a key way to promote citizens' mobility', introducing measures such as the ECTS system to harmonise higher education and such easen mobility pertaining to educational and employment opportunities among different countries, with the primary objectives being to enhance the global competitiveness of European education by enticing non-EHEA students to pursue their studies in Europe, as well as to promote greater internal mobility among Europe's academic community, including learners, teachers, researchers and administrative staff. The imperative to comprehensively advance international mobility within the European Higher Education Area was reaffirmed in the 2018 Bologna Communiqué.

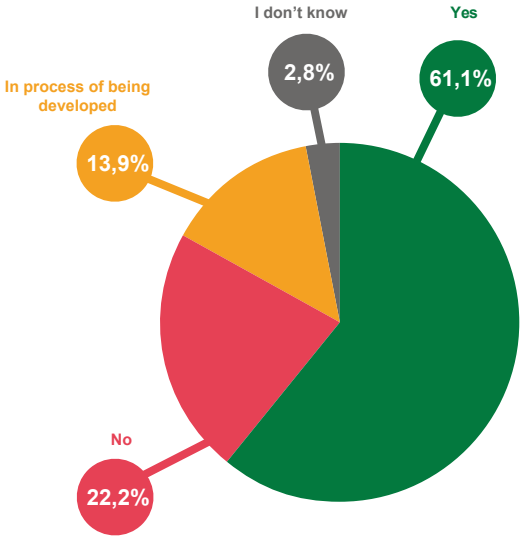
While the 2020 Rome Communiqué reaffirms the significance of mobility within the European Higher Education Area, it should be noted that mobility is intricately linked to the broader vision of an internationalised, interconnected and innovative EHEA (known as the 3 I's of the Bologna Process). This vision is best achieved through the enhancement and facilitation of mobility among learners, researchers and administrative staff. Enhanced mobility can significantly contribute to the development of intercultural and linguistic competencies, fostering a deeper understanding of our interconnected systems and the global landscape.

Regrettably, recent discussions within the Bologna Follow-Up Group of the EHEA have primarily addressed mobility inadvertently rather than explicitly. The Rome Communiqué, alongside its commitment to the 20% mobility objective, also underscores the importance of fostering international and intercultural competencies among all students via the internationalisation of curricula and participation in innovative international environments. Nevertheless, there remains a gap in attention towards critical aspects such as specific actions to ensure the realisation of mobility-related goals. This includes a more ambitious consideration of the concrete steps required to facilitate and guarantee the fulfilment of mobility objectives within the EHEA.

III. Analysis of Bologna commitments implementation

A. Internationalisation policy

11.1. Existence of a top level strategy for the internationalisation of higher education



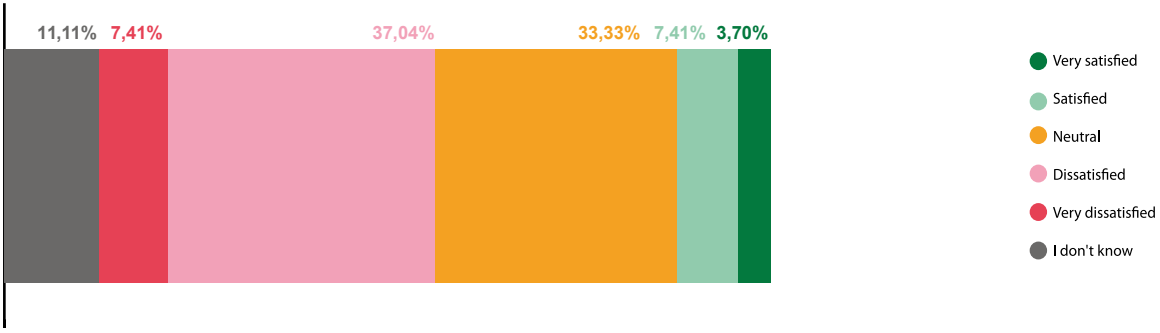
To ensure that targets such as intercultural understanding are facilitated across the EHEA, it is of importance to develop and streamline internationalisation policies Therefore, it was inquired whether there are any top-level strategies on the internationalisation of higher education. 61.1% of NUSes stated that their countries had implemented a top-level strategy, 22.2% reported that no such policy exists and 13.9% said their countries were in the process of implementing one. One NUS did not know whether their country had implemented a national strategy or not.

While a majority of countries have implemented internationalisation strategies, given the importance of internationalisation for higher education, all higher education systems should strive towards developing similar policies. Regrettably, regarding higher education systems where strategies are in

place, half of the NUSes expressed that they as student representatives had not been involved at all or only insufficiently in the design. This reluctance to engage students in the policy creation processes leads to gaps in such strategies, mirrored in the perceptions of NUSes, as nearly three-quarters of NUSes consider the internationalisation strategy of their higher education system as only partially implemented.

It needs further to be noted that while the existence of such strategies is of utmost importance, especially to streamline targets and aims among the entire higher education system, internationalisation policies may vary significantly among countries as to their contents. Further research on this could be interesting in order to understand how and why the policies differ, and especially, in order to understand for which aspects a European-level understanding on definitions and targets could be beneficial, notwithstanding that a diverse range of difference might actually connect to national specificities and thus diversity not being an issue as such.

11.2. Satisfaction with the allocation of resources to support the achievement of target goals

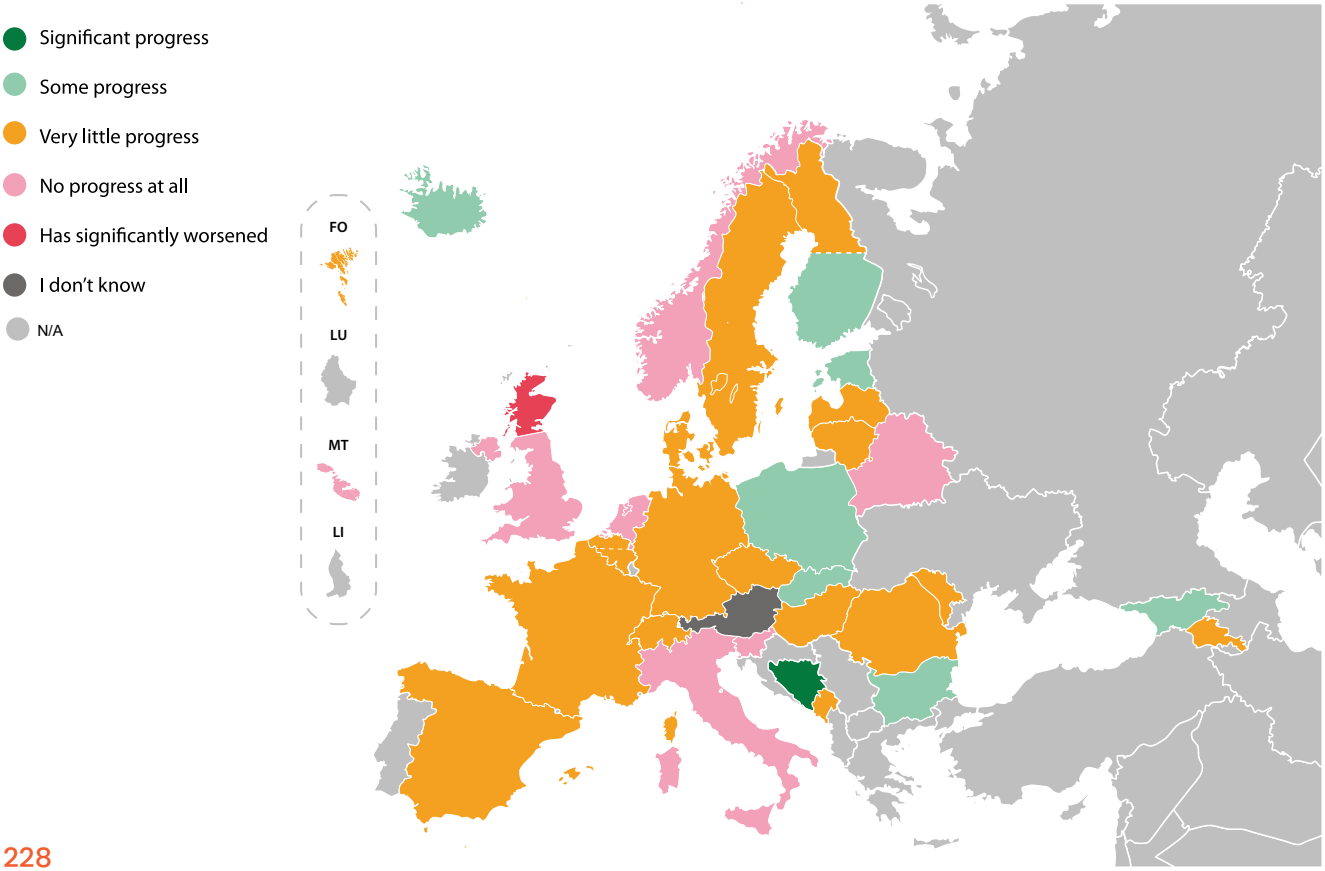


Asked about the allocated resources devoted to achieving top-level targets and objective related to internationalisation and mobility, only 10% of the NUSes expressed satisfaction, while a majority of 44.4% of NUSes express dissatisfaction. Primarily, NUSes cited either a complete absence of funding or insufficient funding relative to the set targets. This suggests a reluctance within these countries to allocate adequate resources and financial support to educational internationalisation efforts.

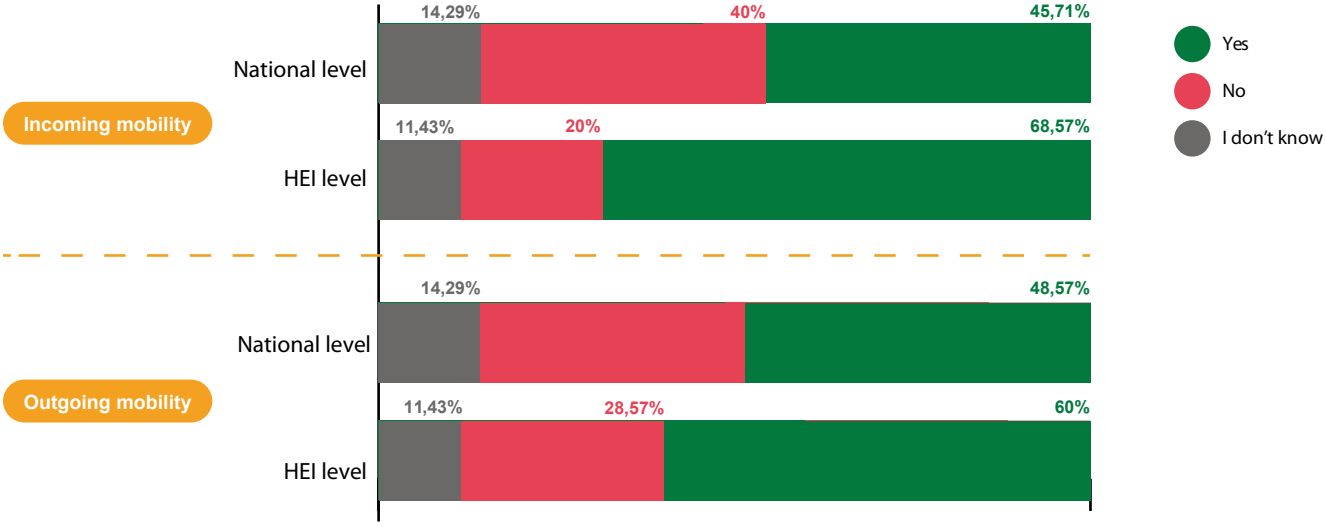
Additionally, respondent NUSes underscored that the usage of funding and decision of allocation in relation to the various objectives depended heavily on individual Higher Education Institutions. A lack of guidance from top-levels is seen to negatively affect especially HEIs with fewer resources. Finally, there is a notable disregard for student involvement in shaping internationalisation strategies, being either tokenist or absent altogether.

B. Facilitation and support of mobility

11.3. Progress made on mobility and internationalisation since 2020



11.4. Existence of effective measures/programs to tackle obstacles to mobility



As fostering mobility is essential for promoting cooperation and exchanging experiences between HEIs, ESU asked NUSes about measures in place to tackle obstacles to ingoing and outgoing mobility as well as the progress made by countries regarding the facilitation of mobility since 2020. It is noteworthy that supporting access to mobility is one of the priorities of the Bologna Process (EHEA, 2020).

With regards to whether there are effective measures in place to tackle various obstacles to both incoming and outgoing mobility, the prevalence of initiatives primarily implemented at the Higher Education Institution (HEI) level is noteworthy, regardless of the mobility type. However, these initiatives are largely unmonitored, with only 25% of them being actively tracked according to the NUSes, suggesting a lack of engagement from governing bodies, leaving NUSes mostly dissatisfied with the measures taken to facilitate mobility. Nevertheless, a few NUSes highlighted good practices.

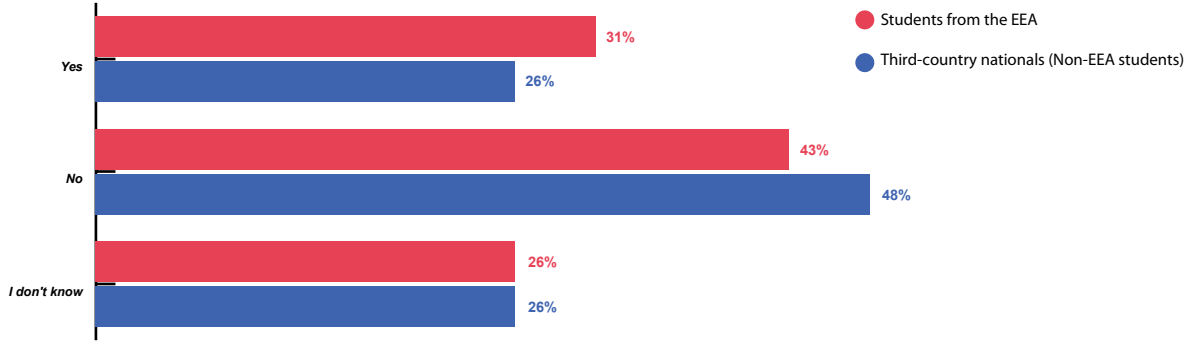
These include the dissemination of relevant information, additional financial support, tailored assistance for student mobility, aid in housing search, and involvement of student representatives in decision-making processes.

As to the progress made in recent years since the Rome Communiqué in 2020 (EHEA, 2020), regrettably, only one NUS (Bosnia and Herzegovina) reported significant progress in terms of access to mobility since 2020. Some progress was noted by the NUSes from Georgia, Bulgaria, Poland, Slovakia, Estonia and Iceland. But most of the NUSes indicated that there was very little progress made. It is to be highlighted that no progress, or better, even a significant decrease was indicated regarding the UK by the Scottish student union. The Turing scheme was mentioned by NUS UK as a new scheme for international students to study in the UK, intended to replace Erasmus+. However, the added complication of visa applications for the UK has made mobility more challenging for international students, rendering the Turing schemes as inadequate in its ability to facilitate international student exchange. Furthermore, no progress was also reported by the NUSes from Italy, Belarus, Croatia, Norway and Netherlands. The Norwegian students union mentioned the new introduction of study fees for third-country nationals as potentially hindering internationalisation.

C. Outgoing mobility & internationalisation at home

1. Strategies and targets

11.5. Existence mobility targets regarding domestic students partaking in student exchange programmes (outgoing mobility)

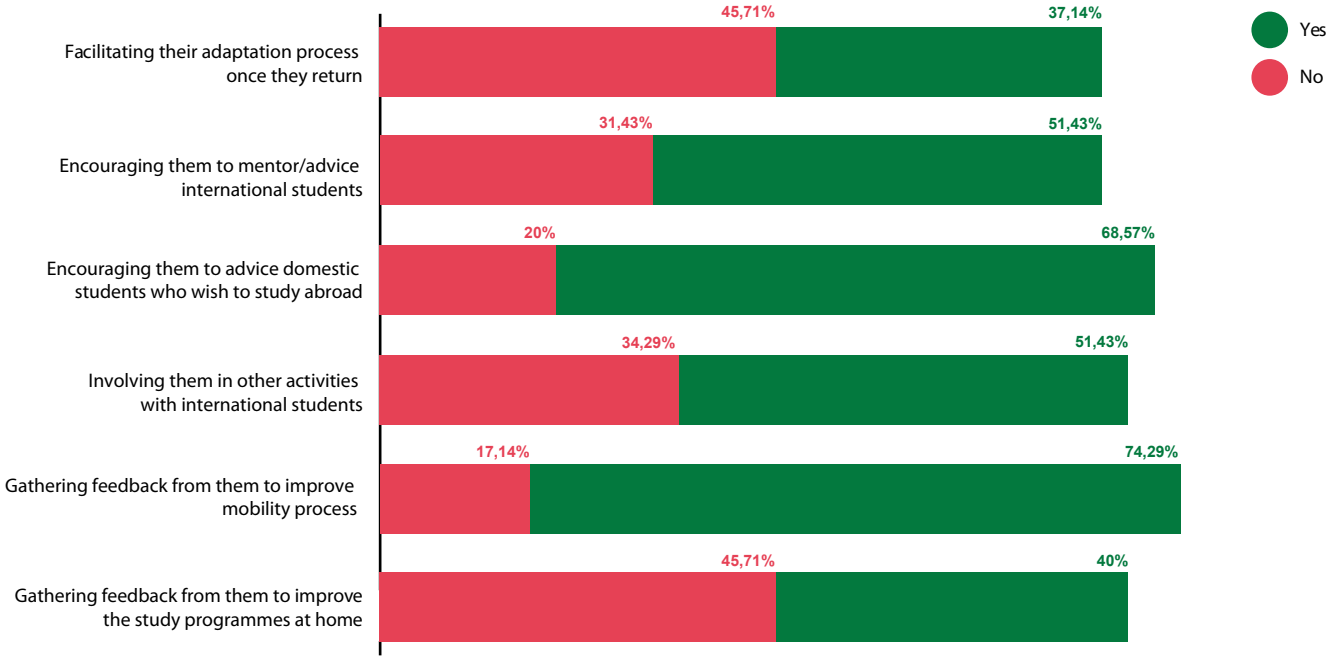


'In today's globalized world , the acquisition of intercultural competence, understanding, democratic values and skills, and language proficiency are crucial for building a harmonious society that accommodates individuals from diverse Backgrounds (ESU, 2023).' Furthermore, mobility does not only enhance the learning experience of students, but also fosters a sense of an European identity and global citizenship, bringing together individuals from different parts of the world. Achieving an interconnected, innovative and inclusive EHEA is thus linked to the 20% target by 2030 as defined in the Rome Communiqué (EHEA, 2020) and promoted by the European Education Area.

To better understand how outgoing mobility is approached in different higher education systems, ESU inquired with its membership whether or not mobility targets have been defined in regards to domestic students going abroad. To this end, only a third of the NUSes reported the existence of such targets both in regards to exchanges within the EEA and/or third countries. Among the higher education systems that have set targets, variations exist, with some having designated targets for specific student cohorts, often with decision-making competencies primarily vested at the level of HEIs rather than on top-levels. As to the satisfaction with the set targets, NUSes highlighted the outdated nature of the targets connected to a lack of regular revision, resulting in misaligned objectives. Furthermore, NUSes underscored the inadequacy of financial resources, support systems, and other student assistance, hindering the attainment of these targets.

ESU further inquired whether any measures were put in place to support students that took part in mobility programmes upon their return to the domestic higher education system. To this end, it can be positively observed that 75% NUSes reported that evaluations are conducted on their experience in partaking in a mobility programme. In addition, it was highlighted that returning students are usually encouraged to function as multipliers, by fostering interactions between them and interested prospective participants in mobility programmes who seek to benefit from their insights.

11.6. Measures being taken for returning students in your country

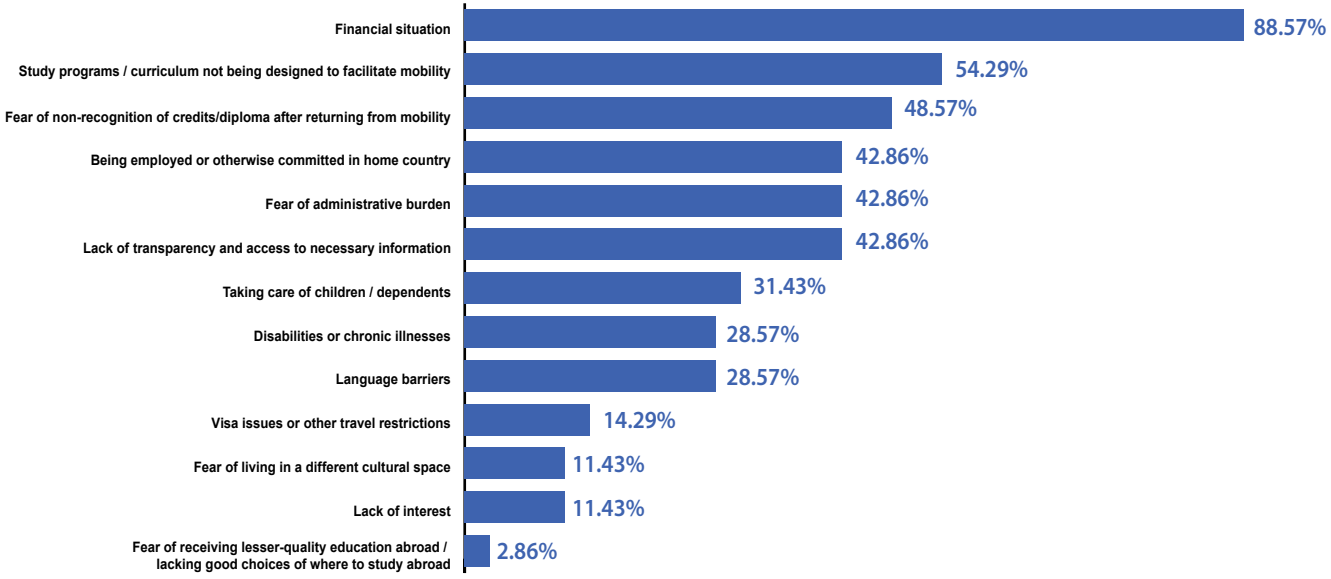


Less positively, NUSes pointed towards a systemic issue regarding the methodology deployed to measure outgoing mobility, as there appear to be no common methods and definitions in place regarding the data collection pertaining the number of participants in and typology of outgoing mobility. Typically, all mobility types are lumped together, not allowing to capture their nuanced distinctions which ultimately is hindering the ability to strategically readjust targets and mechanisms. To enhance comprehension of mobility trends and the habits of students across various higher education systems, it is imperative to devise and collectively endorse guidelines for data collection on mobility. Furthermore, these guidelines ought to delineate between the different types of mobility

(physical blended and virtual), recognizing their inherent differences and allowing for enhanced strategic decision-making with regards to the various targets to be achieved through study-related mobility programmes. Overall, it remains evident that there is an abundance of data, which sometimes is even conflicting and thus there is a need for targeted data based on a common methodology to allow for a minimum of comparison across the European Higher Education Area and for the design of holistic strategies and targeted measures to achieve the objectives.

2. Obstacles to participation regarding outgoing mobility

11.7. Main obstacles preventing domestic students from participating in mobility programmes



As previously mentioned, it is necessary to understand the positives and challenges regarding the setup of mobility schemes and connected policies. To this end, NUSes provided insights into the obstacles for students to participate in outgoing mobility. The primary barrier hindering domestic students from pursuing international opportunities overwhelmingly relates to financial constraints, a concern flagged by nearly 90% of NUSes. Coupled with other aspects such as the dependency on jobs to finance both students' studies and cost-of-living (42.86%) and other possible negative effects regarding stability during one's studies, **this paints a picture of a generation of students who perceive their own partaking in mobility as unattainable**.

However, this is not a new phenomenon, with the issue of unattainability to partake in outgoing mobility for certain groups of students having persisted for far too long. The lack of financial support has consistently emerged as the primary obstacle preventing students from studying abroad, as highlighted in both the 2018 (ESU, 2018) and 2020 (ESU, 2020) editions of Bologna With Student Eyes. Particularly now, amidst the ongoing conflict in Ukraine, the energy crisis, and inflation, the disparity between the costs of living and the grants provided continues to widen. Consequently, the financial hardships reported by students are poised to escalate, significantly impeding mobility opportunities. **While mobility serves as an invaluable educational tool, it cannot come at any cost to students** particularly for those belonging to vulnerable, disadvantaged and vulnerable groups. These concerns are echoed by NUSes. Financial constraints disproportionately affect students from lower socio-economic backgrounds, limiting their participation in mobility programs; inadequate support and accessibility hinder mobility opportunities for students with disabilities; and cultural and social barriers often impede the involvement of minorised students; among others.

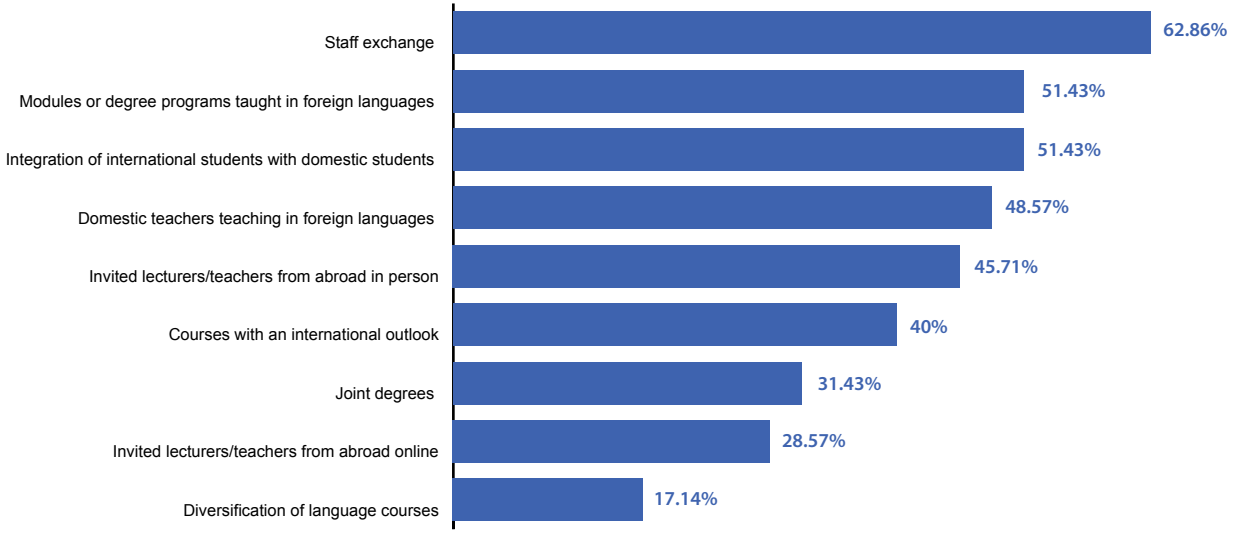
Further additional barriers highlighted by NUSes include study programmes not being designed to facilitate mobility (54.29%) as well as the persisting fear of non-recognition of their credits/diplomas acquired abroad upon the return home which negatively affects the study progress of students, which ultimately can lead to financial repercussions (48.57%). Thus the question arises for many students, what the value of partaking in mobility programmes is vis-a-vis the prospect of having to repeat a semester or full year of studies, ultimately being perceived as wasted time by students and also squandering public funds due to the aforementioned misalignments.

Lastly, NUSes report significant barriers related to administrative complexities (42.86%) and a lack of transparency and access to essential information (42.86%). Despite advancements made by the European Student Card Initiative (ESCI) in recent years, a sizable portion of the student population still grapples with its incomplete implementation. Students require comprehensive information about potential destinations beforehand, and it has to be ensured that ESCI tools are affordable and accessible for all students, designing them on a non-profit-seeking basis (ESU, 2023).

3. Internationalisation at home

Over the past year, the concept of 'Internationalisation at home' (IaH) has emerged as an integral component of higher education institutions' internationalisation strategies. ESU believes that IaH should continue to serve as a catalyst and a platform for facilitating students' engagement in physical mobility. While IaH encompasses a range of policy aspects, ESU focussed on inquiring NUSes to only identify the situation in regards to the most prevalent ones.

11.8. Tools most commonly used by HEIs to support internationalisation at home



According to NUSes, internationalisation at home is most commonly used as a tool pertaining to staff exchanges. This is followed by the offering of internationalisation-oriented courses with a global perspective and linguistic diversity such as through modules or degree programs taught in foreign languages (51.43%), domestic teachers teaching in foreign languages (48.57%), courses with an international outlook (40.00%).

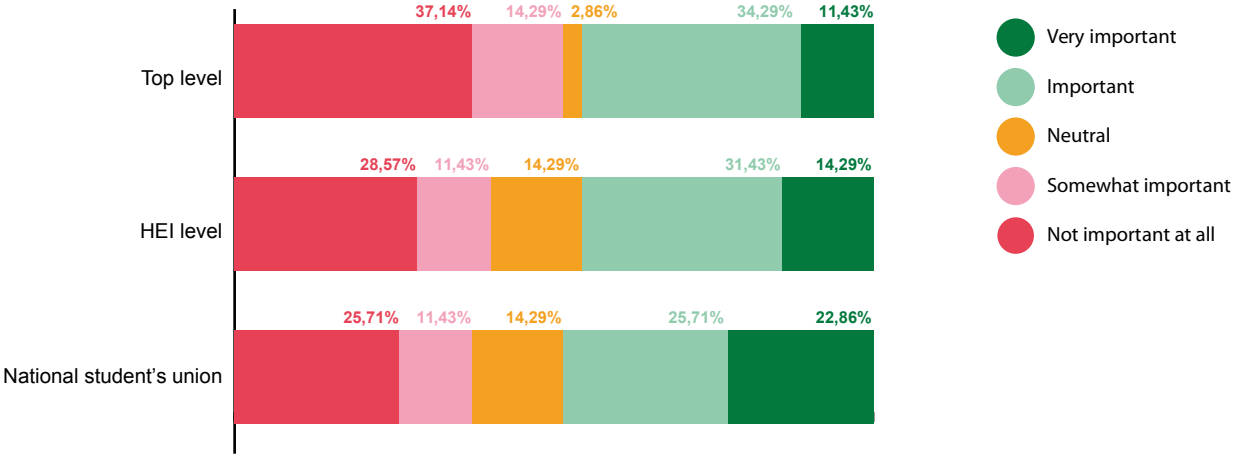
Less common are courses aimed at diversifying language courses (17.14%) and collaborations and partnerships with foreign higher education institutions for joint programs and research projects (31.43%). The latter connects to recent efforts of the European Commission to push forward the idea of 'European Joint Degrees' in order to facilitate new avenues for collaboration among higher education institutions across Europe, though ESU believes that for this all necessary tools have already been established within the Bologna process (ESU, 2024).

Finally, several NUSes underscored the necessity of establishing better avenues for integrating international students (51.43%) and facilitating the participation of guest lecturers/teachers from abroad, both online (28.57%) and in person (45.71%). As to the point of language training for international students, ESU also inquired about the nature of them, to which 60% of NUSes answered that those courses exist and of those only NUSes only half responded that these courses are free, creating a socio-economic barrier to language related integration of international students.

ESU believes that IaH can have an added value to the internationalisation of higher education and allow students who cannot take part in physical mobility schemes to still profit from international exchange opportunities. However, it cannot be considered as mobility as it lacks vital aspects of physical mobility programmes, as such internationalisation at home should not be counted into benchmarks relating to mobility quotas (ESU, 2021). Nevertheless, as to the implementation of internationalisation at home, efforts should be made to have a better integration of the concept into the daily life on campus, with a diverse range of educational activities (especially connecting to language courses) becoming a central part of the higher education experience.

4. Brain drain

11.9. Perception of importance of the issue of brain drain in the national context regarding different stakeholders



Naturally, the issue of outgoing mobility as such and various initiatives to attract international 'talent' especially by Western and Northern European countries prompt considerations regarding brain drain. ESU believes that '[b]rain drains, (...), is a phenomenon that can affect students, academics or workers and can have different dimensions based on the territorial disparities at the regional, national, and European or global levels. (...) Specific policies at the Higher Education level can mitigate or exacerbate brain drain (ESU, 2022).' Thus, ESU inquired NUSes about their perceptions regarding brain drain.

It is crucial to note that 75.86% of NUSes reported the absence of policies on top-level addressing brain drain. This figure is alarming, underscoring a significant lack of interest of public authorities to address a growing issue. Brain drain not only affects higher education systems internally, contributing to urban-rural disparities, but also extends across borders, particularly with migration to Western European countries.

Upon closer examination, NUSes reported a diverse set of views on how the issue is generally tackled in their countries. In some cases, countries are trying to balance out the loss of their own students by setting incentives to retain their own international students, such as in Bosnia and Herzegovina (through free accommodation and fee waivers), the Czech Republic (focusing on retaining students in health related professions) or the Netherlands (offering language classes to international students for better prospects of mid and long term stays). Conversely, France has noted an increasing trend of PhD students leaving, while in regards to the UK the student union pointed towards the effects of an underfunded research environment and high costs of living, having led to around '4.5 million persons (…) considering emigration', with many EU countries having initiatives in place to attract these persons. The Swiss student union highlighted that the exit from several EU programmes (such as Horizon and Erasmus+) may lead to waves of departures from the country in upcoming years.

Ultimately, brain drain needs to be considered not only as a national or regional issue for those areas and countries affected by it, but seen for its far reaching impact on the entire European continent. Initiatives of the EU and especially Western European countries to attract foreign talent are exacerbating the issues, as unbalanced mobility comes along with many strings attached. The profound impact of brain drain extends into all sectors of society, such as innovation and economic strength, the maintenance of functional healthcare and social systems, and even higher education systems themselves. If not addressed at its roots, this phenomenon ultimately leads to the necessity of tools like the EU cohesion funds or development funds from both the EU and countries/regions that immediately benefit from brain drain. Therefore, attracting foreign talent must be considered within the context of a comprehensive approach that takes into account its impact on those communities losing talents. Therefore, balanced mobility must be implemented through coherent and holistic policies, both on national and European/international levels.

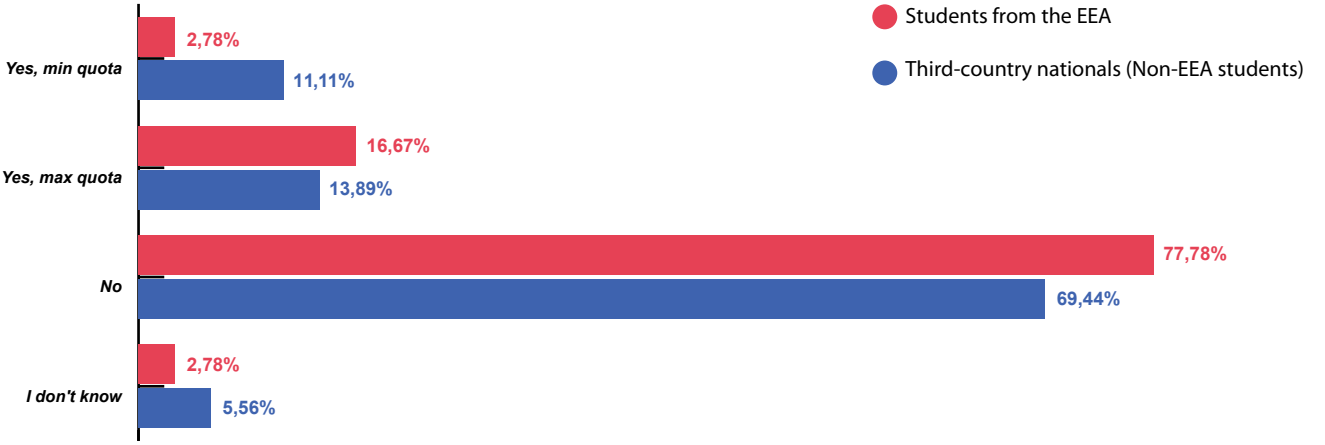
D. Incoming mobility

Hosting international students has a multitude of beneficial impacts on hosting countries, be it in regards to cultural diversity, knowledge exchange, talent, workforce and economic growth (OECD, 2022), with research being the most internationalised area of higher education systems across

Europe (Eurostat, 2024). The success and need of mobility programmes also manifest themselves in the fact that 'half of the world's international mobile students were hosted in countries in North America and Western Europe in 2019 (UNESCO Institute for Statistics, 2022)', with Germany and France being the two countries that host most of the international students. At the same time, most international students face obstacles and discrimination in hosting countries. To this end, as a general trend more and more countries target international students through disadvantageous policies, negatively impacting their quality of life during the studies in hosting countries. Thus, ESU believes it is imperative to not only assess outgoing mobility but also to put a focus on the situation of international students in their hosting country, i.e. incoming mobility

1. Strategies and targets

11.10. Existence of quotas for the receival of students from the EEA vs. third-country nationals (incoming mobility)



To begin with, ESU inquired with NUSes regarding the existence of policies and strategies regarding incoming mobility. Notably, a third of the NUSes remarked that according to their perspective incoming mobility is not systematically worked on in their countries but rather addressed punctually when brought up by individual persons/stakeholders, no matter on which decision making level (top decision-making level, HEI level, national union of students, local student union), pointing towards a huge gap as to even recognising the need to enhance the quality of the student experience of incoming students.

Asked about the existence of minimum and maximum quotas regarding both students from the EEA (European Economic Area) and third-country nationals (non-EEA), most of the NUSes reported that no such quotas exist in their higher education system (EEA: 28 unions, third-country nationals: 25 unions), while only 1-6 NUSes reported the existence of quotas regarding maximum/minimum and/or EEA/non-EEA students. It is also noticeable that quotas for third-country nationals (30.56%) are more prevalent than quotas for EEA-students (22.22%).

Interestingly, according to the NUSes, while maximum quotas seem to be minorly more common for EEA-students than for third-country nationals, minimum quotas were reported more often for third-country nationals than for EEA-students. Where in place, quotas usually connect to health-related study fields, though the explainability might depend on different reasons such as the status of protected profession, the need to retain study spots for domestic students or a need to attract foreign students, among others. Several NUSes (Bosnia and Herzegovina, Germany, Malta, Netherlands) reported that quotas are primarily determined on the level of HEIs. In the Netherlands the housing crisis is currently also leading towards student intake caps with HEIs even recommending international students who are not able to obtain housing prior to the start of their studies to not start their studies at all. Additionally, in Bosnia and Herzegovina, Austria and the French-speaking Community of Belgium quotas have been established specifically for health-related fields of study.

11.11. Existence of mobility targets for the receival of students from the EEA vs. third-country nationals (incoming mobility)

While quotas are a tool to ensure the achievement of certain political goals, ESU also asked its NUSes whether concrete mobility targets exist within their higher education system. The majority of student unions (63,9%) reported that no national targets for incoming student mobility were in place both pertaining to EEA- and third-country nationals. With regard to the NUSes that reported the existence of concrete targets for incoming mobility, these targets encompassed four typologies:

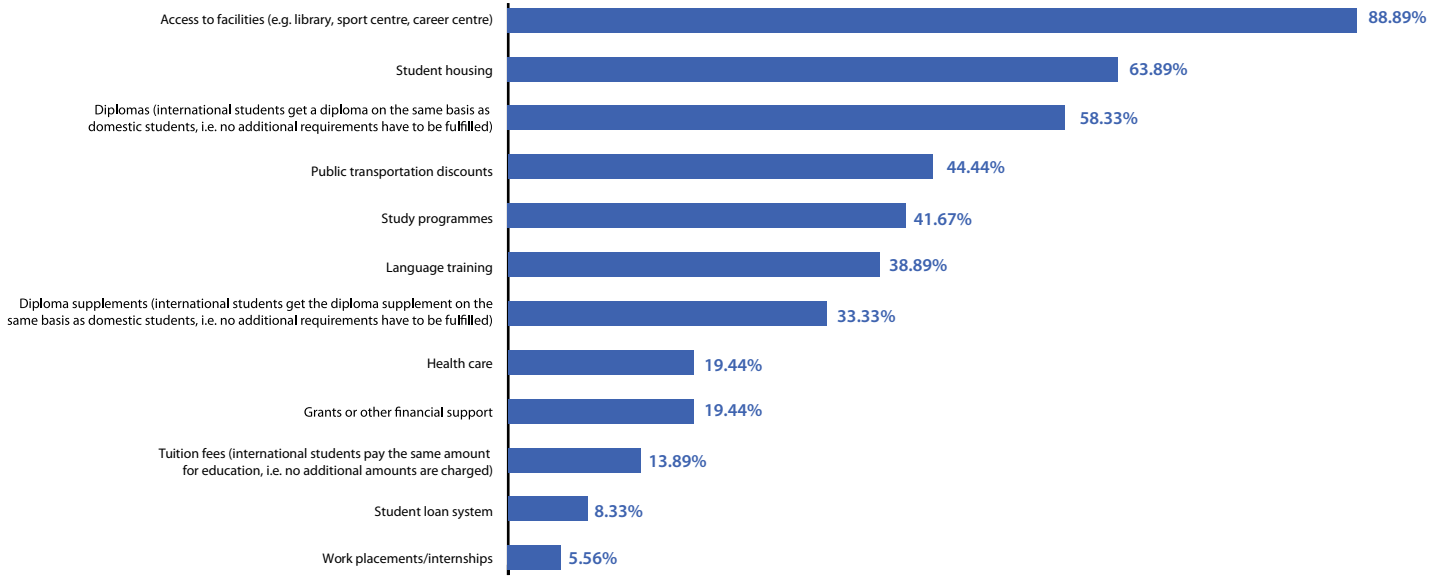
- Aligning with the EHEA target of 20% (or more);
- Targeting a specific set of countries;
- Targeting a certain typology of students (especially PhD students); and
- Targeting certain fields of studies (notably health-related disciplines).

Some NUSes expressed reservations regarding a sole emphasis on quantity, cautioning against potential compromises in quality. Concerns were also raised regarding the potential biases introduced in selection processes due to target setting, potentially exacerbating discrimination.

Additionally, with almost a fifth of NUSes not being aware of whether mobility targets exist for EEA- and/or third-country nationals, the question arises in how far policy-makers and higher education stakeholders sufficiently engage with student representatives to jointly work on the matter. This does not only pertain to the question of whether mobility targets were designed under the in- or exclusion of student representatives, but also in regards to a frequent evaluation of existing targets.

2. Support and services for incoming students

11.12. Availability of arrangements for international students matching those available for domestic students



Assessing which kind of support incoming students receive, especially in comparison to domestic students, ESU placed a focus not only on support in regards to the living conditions of students and study related support, but also on services that aim at fostering social integration.

Notably, ESU observed an apparent trend wherein it is mainly HEIs and local student unions that primarily undertake initiatives for integrating international students. Subsequently, ESU sought information on the parity of arrangements available for international students compared to their domestic counterparts. The majority of NUSes (88.89%) reported that international students enjoy full access to facilities such as libraries and sports centres, mirroring those available to domestic students. Contrasting this, regarding student housing significantly less NUSes (63.89%) indicated parity in access, while even less NUSes (58.33%) affirmed that international students are granted diplomas under the same criteria as domestic students.

Furthermore, less than half of the respondents noted the availability of public transport discounts (44.44%), tailored study programs (41.67%), language training (38.89%), and diploma supplements (33.33%) for international students. Particularly concerning were the lower percentages indicating equal access to health care (19.44%), financial aid such as grants (19.44%), tuition fee waivers (13.89%), and participation in the student loan system (8.33%). Most troublingly, work placements were least accessible to international students, with only 5.56% of respondents affirming their availability.

Lastly, NUSes expressed notable disparities in tuition fees, with international students often bearing a heavier financial burden compared to domestic or EU/EEA students. With regard to the Nordic higher education systems, which traditionally take pride in the universal and free design of their systems, a downwards trend can be observed having resulted in the introduction of fees in Finland and the current discussions in Norway. At the same time, in Germany and in France, public authorities and higher education institutions are coming more and more to the conclusion that the introduction of fees for international students have resulted in a decreased number of international students, thus hurting the internationalisation process in their higher education systems. In addition, NUSes of these countries pointed out the decline in the standard of living and quality of life of international students.

This discrepancy extended to scholarships, potentially creating unfair conditions for non-EU/EEA students. ESU lamented this concerning trend of escalating fees for international students, which not only obstructs access to higher education but also contradicts ESU's longstanding advocacy against commercialising education (ESU, 2017).

IV. Key takeaways and policy recommendations

The significance of mobility and internationalisation in higher education is widely acknowledged (European Commission, n.d.). However, despite the progress made in fostering mobility and eliminating obstacles over the past years highlighted in this chapter, the advancements remain inadequate. Financial barriers still prevent many students from accessing mobility opportunities, international students continue to face segregation through higher tuition fees,, issues persist regarding the recognition of mobility related credits, and there is a noticeable lack of interest from public authorities in supporting both HEIs and students on mobility.

Moreover, challenges persist with information gaps and over-burdening bureaucracy, with indications that these issues are becoming more pronounced. In light of this,there is a need to critically examine the current processes: Are they developed and implemented in the best possible way? Are all relevant stakeholders actively and meaningfully involved? Is there sufficient funding for mobility related issues? Is the trust between institutions and stakeholders established sufficiently?
These concerns converge on a central question: Is the Erasmus+ program, being by far the largest and most impactful mobility scheme to date, truly designed to be inclusive for all students? The consistent recurrence of barriers highlighted in this 2024 Bologna With Student Eyes edition, which echo those identified over again over the past two decades, raises doubts. While some progress has been made, it has been sluggish and falls short of the envisioned ambitions.

Consequently, a pressing question lingers: How can we cultivate a genuinely inclusive and globally oriented European Higher Education Area? To this end, ESU recommends:

1. The allocation of adequate resources to design inclusive mobility programs, including through higher and timely disbursed mobility grants and improved funding for international services within higher education institutions.
2. To meaningfully and systematically engage student representatives across all decision-making levels (local, regional/national, and international) related to mobility policies, including the budget allocation.
3. To ban the practice of imposing tuition fees for international students, along with the elimination of barriers that hinder the access of international students to the same services and rights as domestic students.
4. To implement automatic recognition of all credits and diplomas obtained abroad.
5. A common methodology for all EHEA countries, defining different types of mobility and minimum standards for measuring incoming and outgoing mobility.
6. The alignment of future initiatives taken to advance international mobility with developments linked to twin transitions, ensuring benefits for all stakeholders involved.
7. Finally, to undergo a reflection process on the current mobility targets regarding the 20% target of the EHEA, 25% target of the Commission and the 50% target for the Alliances, notwithstanding the various objectives that governments and HEIs establish themselves, in light of the needed targeted support and necessary support structures to achieve them.
8. Establishment of systematic national and supra-national approaches to combat brain drain including balanced mobility
9. Not counting internationalisation at home as mobility, but instead treating it as a distinguished add-on to the internationalisation of higher education

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Higher education in emergencies

I. Introduction and Bologna commitments

In recent years, European public authorities and other stakeholders in higher education have become more aware of the challenges for higher education resulting from challenging situations such as conflicts/wars, natural catastrophes, pandemics and other emergencies. This was sparked especially by the influx of refugees especially from Syria, Afghanistan and Iraq in 2015, and more recently by the impacts of both the COVID-19 pandemic and the Russian war against Ukraine. The EHEA took note of the effects of different crises in various Ministerial Communiqués and Declarations, including the global financial and economic crises (Leuven/Louvain 2009, Yerevan 2015), conflicts within and between countries leading to displacements and aggravated conditions for higher education systems of conflict-torn countries (Yerevan 2015, Paris 2018, Rome 2020) and the COVID-19 pandemic (Rome 2020). To this end, ministers have committed especially through the 2018 Paris Communiqué and the 2020 Rome Communiqué to:

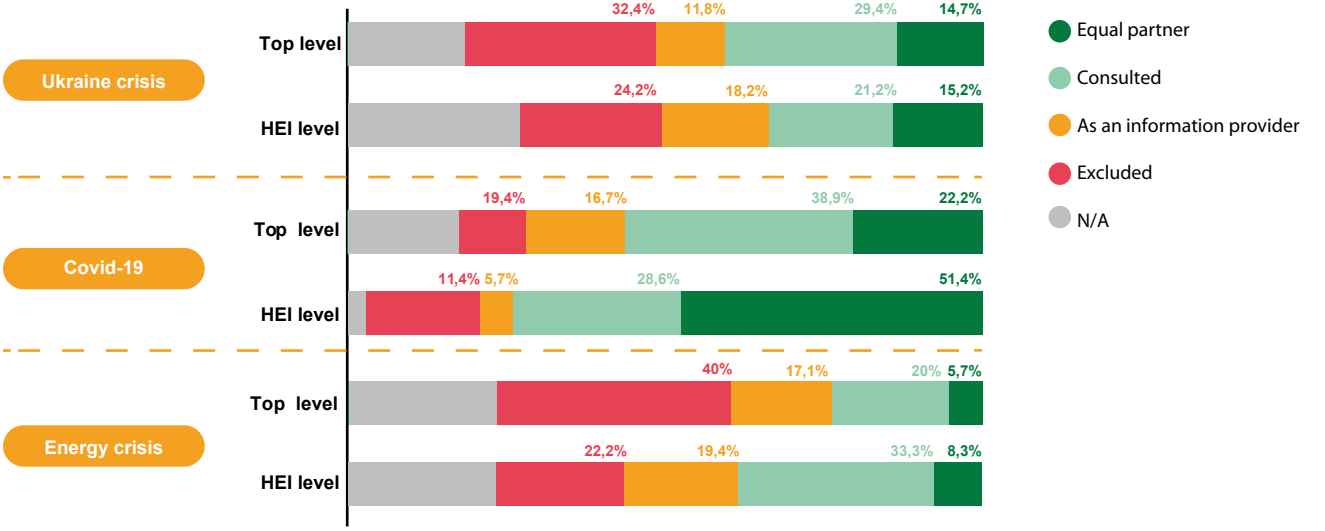
- The recognition of qualifications held by refugees, displaced persons and persons in a refugee-like situation in line with the Lisbon Recognition Convention (2018),
- The adoption of transparent procedures for the recognition of qualifications, prior learning and study periods, supported by interoperable digital solutions (2018),
- Provide inclusive quality higher education in times of crisis (2020),
- Provide appropriate funding for current crises and post crisis recovery aligned with the transition into green, sustainable and resilient economies and societies (2020),
- Support higher education in taking up a leading role in exploring and advising on how to address and overcome limitations regarding digitalisation (2020),
- Enable higher education institutions to engage with societies to address the multiple threats to global peace, democratic values, freedom of information, health and wellbeing – not least those created or exacerbated by the pandemic (2020),
- Overcome the social inequities that still limit the achievement of a fully inclusive EHEA,
- To foster more effective cooperation and closer dialogue among countries, our higher education systems and institutions and with the broader higher education community.

Furthermore, it is noteworthy that various other commitments such as those regarding the Principles and Guidelines on the Social Dimension or the SDGs are also interlinked with the topic of higher education in emergencies and times of crisis. Preceding the following analysis, it is worth noticing that in times of crisis '(...) access to education is at stake, being inextricably connected to general wellbeing, mental health, and social and emotional learning, and thus jeopardised by emergency events (Council of Europe, 2023),' which is also why ESU is dedicating a separate chapter on this issue.

II. Analysis of Bologna commitments implementation

A. Student involvement by PAs and HEIs in their response to the COVID-19, Ukraine and the energy/ cost of living crisis

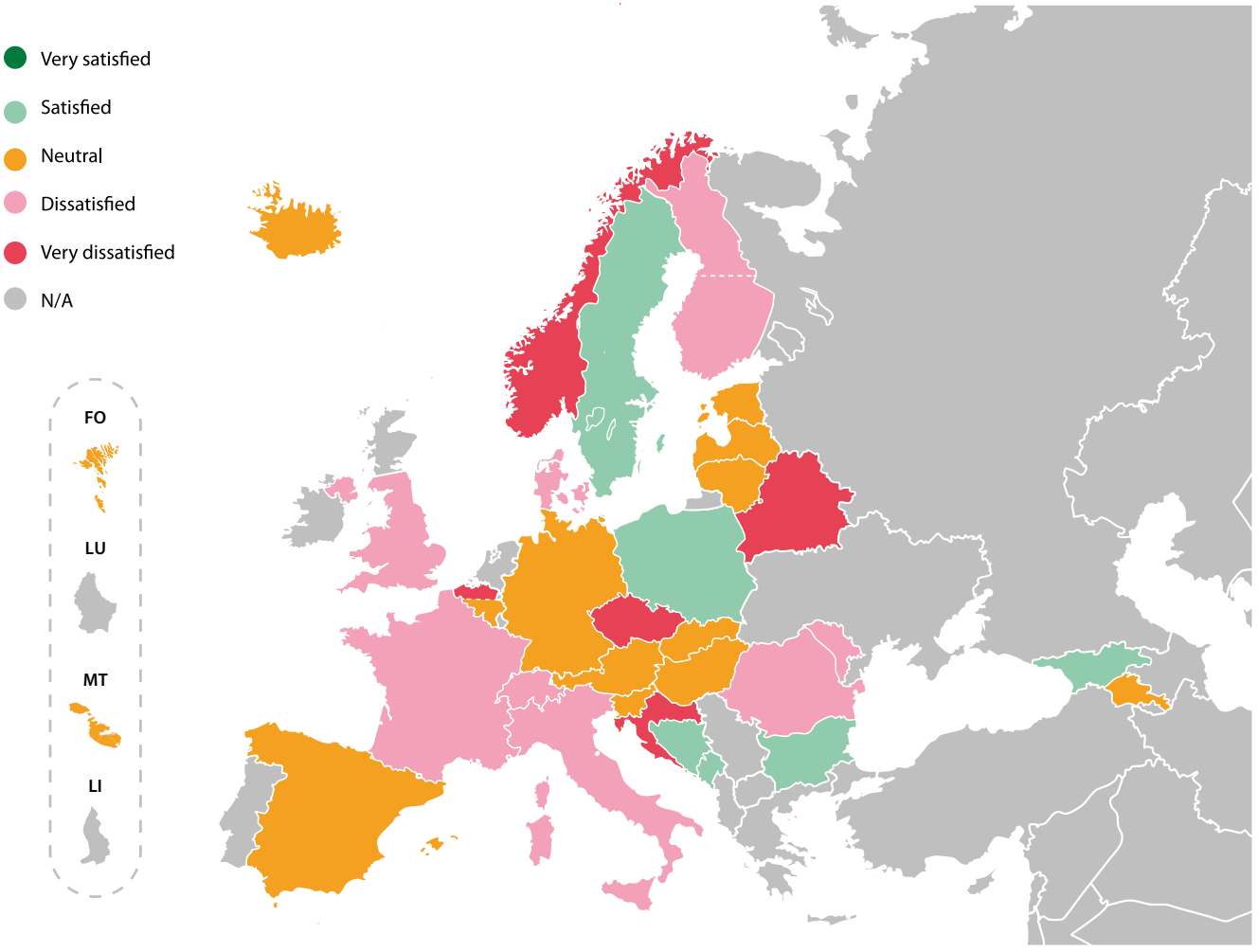
12.1. Student involvement in crisis response management



HE management of a crisis usually differs largely between systems. The COVID-19 pandemic was characterised by great uncertainty. Due to the novelty of the speed and extent of its effects, decision-makers were left at a loss regarding the management of the crisis, which in turn catalysed an openness towards creative solutions as well as broader stakeholder involvement and dialogue to find solutions. This is also reflected in the comparison between student involvement in crisis management regarding the three big crises of recent years - the pandemic, the Ukraine crisis and the related energy crisis. Regarding the pandemic, students' unions reported increased levels of involvement in decision-making processes connected to the crisis management, both by public authorities and at a HEI level. Especially with regard to HEIs, 51.4% of unions reported that they were involved as equal partners in the crisis response management, with an additional 28.6% having at least been consulted. Interestingly enough, even though there was apparently a lot of openness and trust regarding the involvement of students to find solutions during the pandemic, this has not translated into long term strategies regarding the management of higher education in emergencies. If we examine the Russian war against Ukraine, especially regarding the influx of refugee students, only half as many unions reported as having been involved as equal partners or on consultative basis both by PAs and HEIs. This trend continues with regards to the energy and cost of living crisis which is a consequence of the war, where only a quarter of NUSes report having been involved in the crisis management of PAs either as an equal partner or on consultative basis, whereas numbers regarding HEIs are slightly higher.

B. Covid

12.2. Satisfaction with public authorities' management of access to higher education buildings during COVID-19



The COVID-19 pandemic affected the higher educational sector strongly as all over Europe learning and teaching were shifted onto remote and digital platforms , resulting in such negative effects as educational gaps and mental health issues. Regarding the way the public authorities managed the pandemic in relation to the access to higher education facilities, 34.2% of NUSes assessed the decisions of public authorities positively, 15.8% neutral and 39.5% negatively.

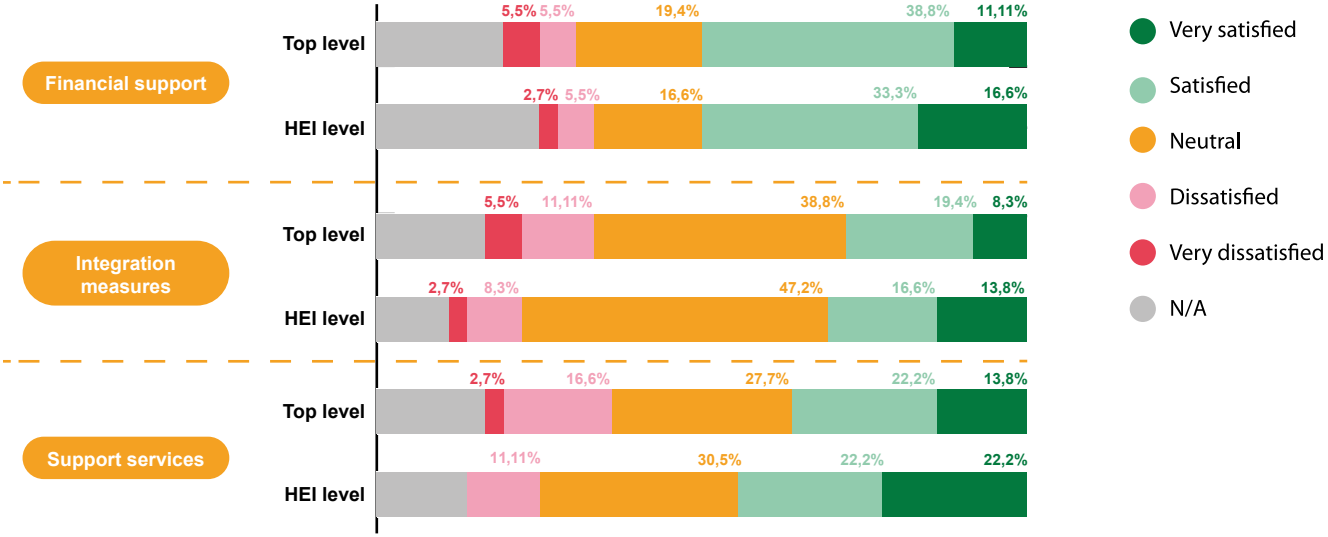
Those unions with a positive assessment referenced that recommended measures by WHO and national health experts were followed, that there was good cooperation with student representatives, and that, despite the move to an online environment, supportive measures such as online lectures, recordings and exams in safe conditions were provided, as well as positive developments regarding the access to digital sources. In Sweden, even though education became digital, campuses remained open, accompanied by pragmatic solutions such as closing places with high risk of infection while keeping those open that were necessary for students' education.

Those NUSes that assessed the management of access to campus negatively or neutrally pointed out that the closure of campuses led to negative effects for students' mental health and impacted the quality of learning and teaching. This was due to teachers not adapting well to the digital environment, as well as the lack of access to libraries and other relevant facilities. The lack of COVID strategies by the Ministry of Education and consequent chaotic management were further mentioned as problems, as well as the neglect of students that didn't have sufficient equipment, infrastructure or who were in need of other support. In some countries, dormitories and HEIs were only accessible for students with valid vaccination certificates, while the transition period to vaccinate was very short and costs for tests had to be covered individually, decreasing accessibility for economically disadvantaged students. As mentioned, these negative assessments were both mentioned by unions assessing the management of access to higher education negatively or neutrally, with the difference being the way the unions assessed the measures in the sense of the security-freedom dilemma. Whilst the problems mentioned can be applied for most countries, the Faroe Islands stick out as their online exams were not accommodated for and no actions were taken to safeguard students on campus. The Swiss and German unions pointed out that due

to the federal structure of their countries, measures diverged institutionally/locally/regionally and changed constantly, causing confusion amongst students and staff.

C. Ukraine

12.3. Satisfaction with the support provided for Ukrainian students



As a consequence of Russia's war against Ukraine, the resulting influx of refugees to neighbouring countries also affected the higher education sector. Ukrainians unlike other refugees were able to enter many European countries without special visa terms and, as members of the EHEA and Lisbon Recognition Convention, easily complied with the requirements to access higher education. To this end, the storage of Ukrainians' qualifications in the national database and the European Temporary Protection Directive were helpful as well. However, it needs to be remarked critically that almost no EU country made use of the possibility to expand the directive for third-country nationals that studied in Ukraine. While many actions were taken in terms of support, ESU asked NUSes with regard to their satisfaction level with measures in regards to financial support, integration measures and support services provided by countries and HEIs respectively. It is noteworthy that some unions opted for the 'neutral' assessment not due to a lack of initiatives but due to not being able to assess the effectiveness of the measures that were taken.

Financial support measures

With regard to public authorities, 50% of NUSes deemed the financial support provided to Ukrainian students as sufficient, with an additional 20% assessing this on a neutral basis. Amongst those that assessed governmental financial support as satisfactory or neutral highlighted measures such as the inclusion in national study loan/grant schemes, coverage of study fees, access to other support systems regarding housing, costs of living, etc. However, unions that assessed governmental financial support as dissatisfied or neutral mentioned a lack of financial support for higher education institutions and grants not being sufficient to cover the costs of living or not being accessible due to requirements for eligibility. Regarding the HEI levels of financial support, the distribution of satisfaction levels overall matches that of the national level, though HEIs performed slightly better regarding the category 'very satisfied'. Measures that were highlighted positively included the waiver of tuition fees, language courses free of charge, provision of cost free dormitories and resources allocated to the wellbeing of international students. Wallonia and France stand out as both countries' NUSes reported being very dissatisfied with both national and HEIs financial support.

Integration measures

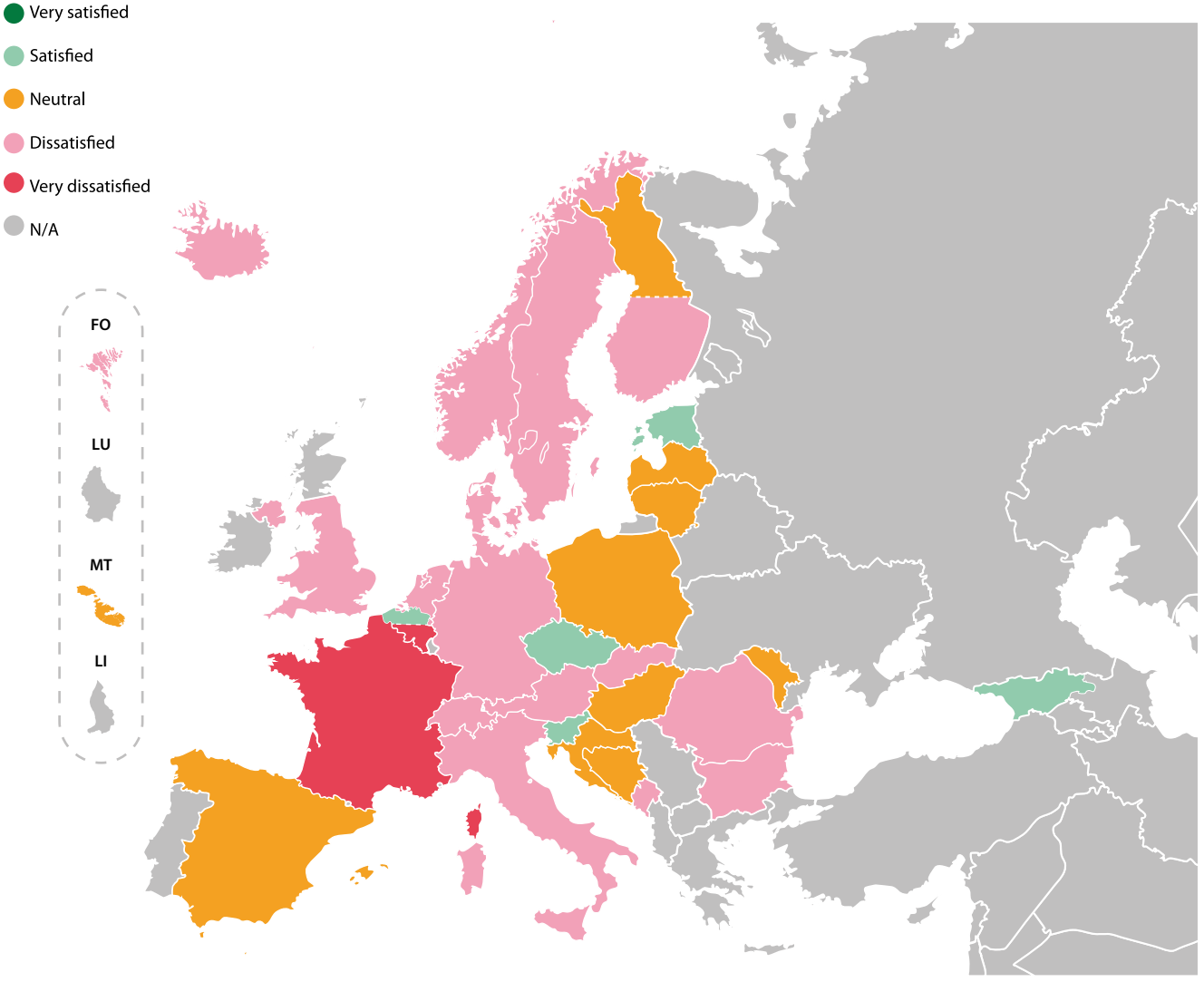
As to integration measures taken by public authorities, NUSes satisfaction levels overall are lower than their views on financial support, with only 31.3% of unions being satisfied, while an additional 43.8% assessed integration measures of PAs neutrally. If we look at the HEIs again the assessment was slightly better than that of PAs due to less dissatisfaction and in favour of more neutral assessments. Amongst the positive measures highlighted were various tailored programmes created for Ukrainian students; shared classes and access to facilities; cultural orientation programs; access to counselling services and access to academic resources; the possibility to access courses to gain ECTS without obtaining a degree (Finland); Ukrainian centres at HEIs (Lithuania); or national academic contact points for Ukrainian students and researchers (e.g. via the German Academic Exchange Service (DAAD), n.d.). Unions also highlighted the importance of integration measures led by local students' unions and other student-led initiatives, especially where PAs and/or HEIs did not provide sufficient support. One union wrote, '(...) the HEIs and the students themselves deserve praise for their commitment and efforts'.'. Only in the case of Finland's universities and the Faroe Islands did unions report dissatisfaction with the universities, with the Finnish highlighting that integration measures were mostly dependent on students and students' unions and varied a lot depending on the faculties.

Support services related measures

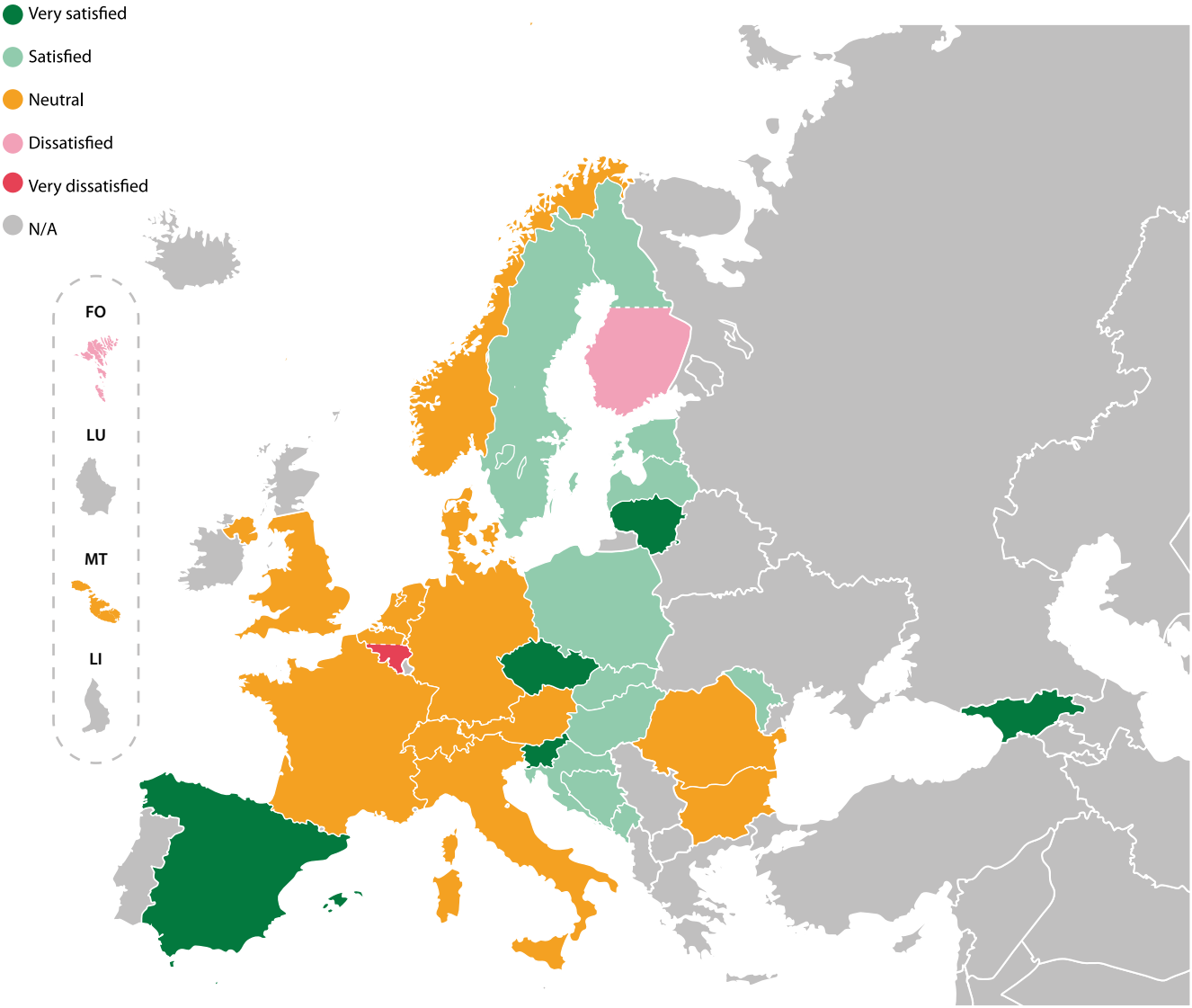
Lastly, in terms of satisfaction levels regarding other support services not directly linked to financial support or integration measures, 40.6% of unions assessed the PAs efforts positively, with an additional 31.3% assessing it neutrally. Similarly, 48.5% of unions assessed efforts of HEIs positively, with an additional 33.3% assessing them neutrally. Unions highlighted as positive measures, social and non-material support, special status allowing for special treatment including the translation of the EU temporary protection directive into national measures (especially in comparison to other refugee groups), psychological support services and helplines, monitoring of study progress, translations and management of the 'mass influx'. At the same time, the NUSes criticised a lack of study places, lack of information and study guidance The supports put in place were designed for a short period only. Despite lobbying efforts there was a lack of assistance for certain groups of students that were unable to leave Ukraine. Regarding the temporary protection directive it is noteworthy that the Bundesland of Hamburg was one of the rare cases where the directive was also expanded to international students that had fled Ukraine. Additionally, some unions highlighted problems regarding continued support as the directive was about to run out when the survey was conducted.

Overall, HEIs responses to the influx of Ukrainian refugee students were assessed as being better than PAs. It is noteworthy that it was highlighted that a clear discrepancy in the different policies regarding refugees from Ukraine versus refugees of other (non-European) countries could be observed, with Ukrainians receiving more support than other refugee groups. NUSes from Eastern and Central European countries were overall more satisfied with measures taken by PAs and HEIs than NUSes from other parts of Europe - though it needs to be highlighted some of the 'neutral' answers coincide with unions not being able to assess the effectiveness of measures rather than only judging based upon the amount of measures that were taken (e.g. Germany).

12.4. Satisfaction with the financial support for Ukrainian students provided by top levels



12.5. Satisfaction with the financial support for Ukrainian students provided by HEIs



III. Key takeaways and policy recommendations

The multiple crises of recent years have underscored the importance of the Bologna commitments regarding higher education in times of emergency. The analysis of the implementation of Bologna commitments , particularly in response to the COVID-19 pandemic, the Russian war against Ukraine, and the ensuing energy and cost of living crisis, reveals several key takeaways:

The involvement of students and other key stakeholders in finding mutual solutions was notably high during the COVID-19 pandemic. However, this positive example of joint action to steer through the crisis did not translate into long-term strategies in terms of managing higher education in emergencies, as the low student engagement with regard to Ukrainian refugee students and the subsequent energy crisis has shown. During the pandemic, higher education shifted to remote and digital learning, speeding up digitalisation processes at large. However, the assessment of PAs, especially those measures to combat the impact on mental health, educational gaps and the inconsistent access to digital resources varied. It is clear there was a need for a more cohesive and adaptable approach to crisis management whether those strategies related to open campuses and safety measures or accessibility challenges.

Even though Europe had to adapt to the influx of Syrian refugees in 2013 and subsequent years, when the war against Ukraine broke out, many HEIs and PAs seemed to have to relearn how to adapt once again. The influx of refugee students showed once again the importance of financial support, integration measures and access to support services. Contrary to other refugee groups, help for Ukrainian refugee students was very abundant and allowed for more flexibility. A lot can be learned from this, be it with regard to the easing of visa regulations, provision of services and aid, as well as the recognition of qualifications.

Linked to arguments and data presented in the chapters on student and staff participation, fundamental values and the social dimension (regarding social dialogue), it is to be emphasised that the existence of cohesive and adaptable crisis management strategies in connection with broad stakeholder involvement is crucial in order to prevent negative impacts on academic freedom and the European model of democratic and participatory higher education governance. This relates both to issues such as the legitimacy and effectiveness of measures, as well as to academic freedom, as '[a]cademic freedom exists within wider societal frameworks, and threats and infringements to academic freedom emerge within both democratic and authoritarian societies (Popovic & Matei, 2022).' In times of crisis, the principles of democracy are tested and endangered as fundamental rights might be circumvented or suspended through emergency acts, which additionally bear high risk of not being reversed after the end of the crisis. To this end, the systematisation of social dialogue and stakeholder involvement in higher education governance '(...) is crucial to build resilient learning environments and thus contribute to the establishment of better administered education ecosystems and communities in times of emergencies (Council of Europe, 2023).'

From the multiple crises and emergencies of recent years, several recommendations are recommended:

1. The ongoing and meaningful involvement of students in crisis management and decision-making processes should be encouraged. Mechanisms for the systematic collaboration between students' unions and representatives, public authorities, higher education institutions and other key actors should be established.
2. Comprehensive and adaptable crisis management strategies should be developed, considering the diversity of challenges posed by different crises, ensuring continuity in education and support services. International collaboration and information sharing to enhance the effectiveness of crisis response measures should be fostered.
3. Social inequities should be addressed by implementing measures that ensure inclusive and accessible higher education for all students, despite and especially in times of crisis. The impact of crisis response measures on marginalised and vulnerable groups needs monitoring and

evaluation to allow learning about how to mitigate inequities.

4. Communication and coordination between PAs and HEIs should be enhanced and measures be aligned where possible in order to provide clear and consistent information to students during crises. To this end, standardised procedures can be an advantage.
5. A thorough evaluation of the responses to the COVID-19 pandemic should be conducted to identify best practices and areas for improvement. Lessons learned should be integrated into future crisis management strategies and policies to enhance the resilience of European higher education systems.
6. Equitable support for refugees and students at risk of persecution should be ensured. To this end, discrepancies in support for refugees from different regions should be addressed and equitable treatment and assistance to all displaced students ensured. Clear guidelines and support mechanisms for HEIs should be established as well as necessary financial resources provided in order to accommodate and integrate refugee students effectively. To this end, the rights of refugees to recognition of their qualifications as stipulated in the Lisbon Recognition Convention need to be promoted and anchored more thoroughly. Lessons learned and best practices from the Ukrainian refugee influx should be translated into strategies.

By implementing these policy recommendations, European countries can build a more resilient and inclusive higher education system that effectively responds to crises, ensuring the well-being and educational continuity of all students.

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Appendices

I. List of abbreviations

AI	Artificial Intelligence
BFUG	Bologna Follow-up Group
BP	Bologna Process
BWSE	Bologna with Student Eyes
CoE	Council of Europe
DEQAR	Database of External Quality Assurance Results
DS	Diploma Supplement
E4	Group composed of the European Association for Quality Assurance in Higher Education (ENQA), European Students' Union (ESU), European University Association (EUA) and European Association of Institutions in Higher Education (EURASHE)
ECTS	European Credit Transfer and Accumulation System
EEA	European Education Area
EHEA	European Higher Education Area
ENIC	European Network of Information Centres
EQAR	European Quality Assurance Register
EQPR	European Qualifications Passport for Refugees
EQF	European Qualifications Framework
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EU	European Union
HEI	Higher Education
IaH	Internationalisation at Home
LLL	Lifelong Learning
LOs	Learning outcomes

L&T	Learning and Teaching
LRC	Lisbon Recognition Convention
NARIC	National Academic Recognition Information Centres
NQF	National Qualifications Framework
NUS	National Union of Students (plural NUSes)
PAGs	Principles and Guidelines for Social Dimension
PAs	Public Authorities
PLA	Peer learning activities
QA	Quality Assurance
QF-EHEA	Qualification Framework of the European Higher Education Area
RPL	Recognition of Prior Learning
SCL	Student-Centred Learning
SD	Social Dimension
TPG	Thematic Peer Groups
UNESCO	United Nations Educational, Scientific and Cultural Organization
WG	Working Group (in the context of the Bologna Follow-Up Group)

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III. List of country abbreviations

AM	Armenia
AT	Austria
BiH	Bosnia and Herzegovina
BE	Belgium
BE – FR	French Community
BE – FL	Belgium - Flemish Community
BG	Bulgaria
BY	Belarus
CH	Switzerland
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FI – HE	Finland - higher education sector
FI – VET	Finland - university of applied sciences
FO	Faroe Islands
FR	Fance
UK	United Kingdom - England, Wales and Northern Ireland
UK Scotland	Scotland
GE	Georgia
HR	Croatia
HU	Hungary
IT	Italy
LT	Lithuania
LV	Latvia
MD	Moldova
ME	Montenegro

NL	Netherlands
NO	Norway
PL	Poland
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia
UA	Ukraine

IV. List of of BWSE data collection

List of NUSes	Country	Part I	Part II	Part III	Part IV	Part V	Part VI	Part VII	Part VIII	Part IX
ANSA	Armenia									
OH	Austria									
BOSS	Belarus									
BSA	Belarus									
FEF	Belgium									
VVS	Belgium									
SURS	Bosnia Herzegovina									
NASC	Bulgaria									
CSC	Croatia									
POFEN	Cyprus									
SK RVS	Czech Republic									
DSF	Denmark									
EUL	Estonia									

Yes No answer No

List of NUSes	Country	Part I	Part II	Part III	Part IV	Part V	Part VI	Part VII	Part VIII	Part IX
MFS	Faroe Islands									
SAMOK	Finland									
SYL	Finland									
FAGE	France									
GSOA	Georgia									
fzs	Germany									
HOOK	Hungary									
LIS	Iceland									
USI	Ireland									
NUIS	Israel									
UdU	Italy									
LSA	Latvia									
LSS	Lithuania									

Yes No answer No

List of NUSes	Country	Part I	Part II	Part III	Part IV	Part V	Part VI	Part VII	Part VIII	Part IX
UNEL	Luxembourg									
KSU	Malta									
ASM	Moldova									
SPUM	Montenegro									
ISO	Netherlands									
LSVb	Netherlands									
NSO	Norway									
PSRP	Poland									
FAIRe	Portugal									
ANOSR	Romania									
SKONUS	Serbia									
SRVS	Slovakia									
ŠOS	Slovenia									

List of NUSes	Country	Part I	Part II	Part III	Part IV	Part V	Part VI	Part VII	Part VIII	Part IX
CREUP	Spain									
SFS	Sweden									
VSS-UNES-USU	Switzerland									
NUSUK	UK									
NUS Scotland	Scotland									
UAS	Ukraine									

Yes No answer No

Surveys:

Part I Student Participation
Part II Academic freedom, academic integrity and institutional autonomy
Part III Social Dimension
Part IV Quality Assurance
Part V Internationalisation and Mobility
Part VI Key commitments
Part VII Learning and teaching
Part VIII Public responsibility and financing of higher education
Part IX General questions about the Bologna Process

Bologna with Student Eyes is a reality-check of what has been agreed upon by national governments within the Bologna Process and what the actual situation is for students. The data for this edition was collected by surveying the European Students' Union's national unions of students in the following areas: student participation in governance, social dimension, quality assurance, recognition, mobility and internationalisation, structural reforms, student-centred learning and financing of higher education. The questionnaire also included general questions about the Bologna Process and its future. In total, 37 national unions of students from 37 countries responded to the questionnaire, from Norway to Malta and Spain to Armenia.

The European Students' Union(ESU) promotes students' interests at European level towards all relevant bodies and in particular the European Union, Bologna Follow-up Group, Council of Europe and UNESCO. Through its members, ESU represents almost 20 million students in Europe.