Strasbourg, Brussels, Vatican, Warsaw, August 30, 2013

**STRUCTURAL REFORMS WORKING GROUP**

Brussels, September 24 – 25, 2013

**TOWARD A REPORT BY THE STRUCTURAL REFORMS WORKING GROUP TO THE BFUG**

Discussion document by the Co-Chairs of the Structural Reforms Working Group

**Item X**

**INTRODUCTION**

The Structural Reforms Working Group (SRWG) is expected to submit a draft report to the BFUG in fall 2014. While the Co-Chairs consider that it has been useful for the SRWG to have had two initial meetings with a relatively free discussion of different aspects of its mandate - including a focus on transparency instruments at its second meeting - and while the third meeting of the SRWG will include a more in-depth discussion of qualifications frameworks, the Co-Chairs also consider it essential that the work of the SRWG from now on focus on developing its report to the BFUG.

The present document aims to sketch an outline of the report as well as a timetable for developing it. A sketch of the proposed outline of the report, discussed in some detail in the present document, will be found in Appendix 1, whereas a sketch of the information required for each issue (see “Information required” below), will be found in Appendix 2.

The report by the SRWG will constitute the main EHEA document on structural reform in the 2012 – 15 work program. It should as far as possible cover the areas listed in the terms of reference of the SRWG while keeping in mind that, on the one hand, the terms of reference are very extensive and, on the other hand, the need to see the four main policy areas covered by the terms of reference in context.

The SRWG is the only working group with more than one sub-group. Each of the sub-groups should contribute to the report of the SRWG. This may raise some challenges in terms of timing but will also contribute greatly to the content of the report.

**POLICY AND IMPLEMENTATION**

One topic of discussion has been the balance between policy considerations and recommendations, on the one hand, and reporting on and identifying obstacles in the implementation of the structural reforms adopted within the EHEA so far, on the other hand. An important issue here is the balance between the report of the three thematic working groups (structural reforms; mobility and internationalization; social dimension and lifelong learning) and the Implementation Working Group. It is important to avoid overlap and in particular to avoid asking countries and organizations to provide the same information twice to different groups. The SRWG Co-Chairs therefore recommend that the report by the Implementation WG be the main source for information on the state of implementation of structural reform and hence also on obstacles or concerns about the speed of implementation of specific aspects of structural reforms.

Ideally, the information provided by the Implementation WG would provide a basis on which the SRWG could consider possible measures to improve implementation in areas where implementation is lagging behind. However, this would require that the report by the Implementation WG be available some time before the reports by the thematic working groups need to be submitted to the BFUG. As we know, the opposite will be true: for the report by the Implementation WG to be based on as up to date information as possible, the first draft will not be available until early 2015. The reports by the thematic working groups will therefore only to a limited extent be able to comment on the implementation of their respective policy areas, at least to the extent these comments should built on recent data. It may, however, be possible to discuss possible recommendations on implementation with the Co-Chairs of the Implementation Working Group some time in spring 2014.

**INFORMATION REQUIRED**

The Co-Chairs are concerned that the main issues covered by the report be presented coherently and that, without wanting to impose a too rigid scheme, they follow the same outline. For each issue, it is therefore suggested that the description follow the following outline:

**Concept**

What is the concept covered? Is the concept clear or is there a need for the EHEA, at the competent level (Ministers, BFUG, Working Group, as the case may be) to clarify the concept?

**Description**

A brief description of the issue and how it relates to structural reform, as well as of the level(s) (EHEA, regional, national, institutional) concerned.

**Issue**

What is the direct issue that needs to be addressed? What is the problem and why is it a part of the report?

**Solution(s)/Recommendation(s)**

What does the SRWG recommend in response to the issue? This may not only be an issue of “what?” but also of “who?”, “how?” and “by when?”

An obviously fictitious example would be a recommendation to the effect that “all EHEA members rewrite their national qualifications framework in broad consultations with all stakeholders by the end of 2015”. A perhaps not-so-fictitious example may be to propose that all EHEA members submit plans by the July 2016 (i.e. a good year after the next Ministerial conference) for how they intend to fulfill the commitment made in Berlin to issue the Diploma Supplement automatically, free of charge and in a widely spoken language, including a timetable for when this commitment will be fulfilled.

**A FIRST OUTLINE OF THE REPORT**

In the following, we will seek to provide a first outline of the report and to indicate what could be the main content of each part. We do not at this stage seek to provide any extensive outline of specific issues or to suggest recommendations. As mentioned, a skeleton outline is provided for reference in Appendix 1.

**Introduction**

The introduction should describe the context of the report. This would include a description of the SRWG terms of reference (which should also be appended to the report *in extenso*) as well as of the four sub-groups and the relationship of the sub-groups to the SRWG. The introduction should make the point that contributions from the sub-groups have been included in the report. It might be considered whether more extensive reports form the sub-groups will be made available electronically, in which case the SRWG report should include the reference to the web sites. This is ultimately an issue for the BFUG to decide.

It is important to note that the overarching goal of the SRWG – as of the three other working groups is to develop the EHEA further. The achievement of that objective requires structural reforms in the participating countries in all four major policy areas covered by the SRWG. The structural reforms have to be coherent and they need to be implemented properly and timely. However, we know - e.g. from the seminar on the 2nd cycle and from briefings by the third cycle working group - that a broad diversity will continue to exist with regard to qualifications frameworks and quality assurance. The report should therefore also point to how to deal with diversity and to how we could make the diversity more transparent. That can be included in the transparency issue but that can also be included in the recommendations part of each area (QF, QA, recognition).

The report will also need to acknowledge that higher education worldwide is undergoing many changes and that many of those changes will have a (structural) impact on our higher education systems. MOOCs may be the most obvious example of this. The report cannot fully explore the impact of these changes, in part because it already has terms of references that are both extensive and specific and in part because many of these developments are still in the making. The report could, however, make the point that the EHEA needs to follow developments closely also in the 2015 – 18 work period and that it may wish to reflect on what the impactions of some of the developments may be on the very concept of an education system.

The introduction would need to note that two important, specific areas of structural reform – the revision of the ESG and the pathfinder group on automatic recognition - lie outside of the remit of the SRWG. Whether some reference should be made to one or both initiatives in the report will need to be assessed toward the end of the period. The SRWG will be expected to – and will expect to – comment on both initiatives at some stage.

The introduction should also provide a brief background by referring to the main work on structural reforms in the EHEA so far and it should in particular refer to the reports by the working groups on recognition, qualifications frameworks and transparency instruments to the Bucharest ministerial conference. It should also note that policy developments in quality assurance have for the most part been driven by the E 4 group as well as, more recently, by EQAR.

The introduction should also make the point that structural reforms have been a major part of the EHEA agenda –as well as of the public image of the EHEA – so far. Many structures have been reformed and even if some work remains before all countries have developed e.g. national qualifications frameworks compatible with the QF-EHEA and national quality assurance agencies operating in full accordance with the ESG and qualified for membership of ENQA and/or EQAR, the main challenge over the coming years will nevertheless be to ensure that the reformed structures are implemented. This could be illustrated by the fact that national implementation of the Lisbon Recognition Convention through policies and practice for fair recognition is highly uneven and that many public countries (and institutions) have yet to deliver on the commitment made by Ministers in Berlin to issue the Diploma Supplement automatically, free of change and in a widely spoken language by 2005.

Not least, the introduction should make the point that one important reason for establishing a working group on structural reforms, replacing the working groups on specific policy areas in the previous work programs, was that the BFUG felt a need to see structural reforms in context and to assess how the four main policy areas influence each other. In this respect, the introduction should also refer to an elaborate on the considerations outlined in its terms of reference:

“The Working Group should consider structural reforms in relation to the major purposes of higher education:

* Preparing for employment;
* Preparing for life as active citizens in democratic societies;
* Personal development;
* The development and maintenance of a broad, advanced knowledge base;

as well as the three missions:

* teaching and learning;
* research;
* service to society.

It should further be guided by the following policy considerations:

* Students, employers and society at large want more objective, reliable and high quality information about higher education;
* There is an increasing societal expectation of Higher Education Institutions that they enhance the employability of graduates and provide students with skills relevant to the labour market;
* There is a need to adapt the Bologna goals and instruments for structural reforms to the ever changing context of higher education and of our societies and to the evolving needs within the EHEA;
* There is a need to build trust and confidence in higher education;
* The relationship between the structural reforms developed within the EHEA and their impact on other regions needs to be considered;
* There is a need for a more supportive environment for academic staff and students;
* Higher Education needs to contribute to Lifelong Learning.”

Finally, the introduction should explain that the report will first consider each major policy area separately and then consider the relationship between them.

**POLICY AREAS**

For each of the four policy areas, the SRWG should identify specific issues that should be covered by the report and on which the SRWG may want to give recommendations. In the report, these should be covered according of the outline given under “Information needed” above.

In the discussion below, a cross reference to the specific tasks listed in the ToR is provided where relevant. The first of these tasks (Consider and make recommendations on specific issues of policy and practice related to quality assurance, qualifications frameworks, recognition of qualifications and transparency instruments and their mutual interaction) as well as tasks 14 - 17[[1]](#footnote-1) are relatively general and will therefore be covered by the report as a whole. Some policy issues will nevertheless be included in the discussion elbow with reference to the first specific task of the ToR. As will be shown, some tasks may not warrant separate mention in the final report. They are nevertheless referred to here, mostly under “overarching issues”, to ensure that no part of the specific tasks is overlooked. The SRWG may need to assess whether the recommendations should aim broadly or rather focus on a more limited number of issues.

The issues listed below are ordered according to policy area and within each area according ot the number of the specific task as listed in the ToR. The order should therefore *not* be read as an indication of relative importance or preference.

**Quality assurance**

***Common principles of quality assurance to be applied across HE and VET*** (ToR no. 4)

One of the recommendations by the Irish Presidency conference held in Dublin on March 12 – 13, 2013 was that the EQF Advisory Group and the BFUG working group on Structural Reforms, in co-operation with ENQA and EQAVET, review and make proposals to strengthen the common principles of quality assurance to be applied across HE and VET. A first exchange of views will be held with the EQF Advisory group during the joint session on September 25.

***Comment on the draft amendments to the revised ESG*** (ToR no. 10)

This task will need to be considered in the light of the BFUG thematic debate on November 7 – 8 and it may or may not be a part of the SRWG report. Even if this point is included in the report, the SRWG will most likely need to comment on the draft separately, very possibly at its meeting on December 9 – 10, 2013.

***EQAR-registered quality assurance agencies operating in countries other than their countries of origin*** (ToR no. 13)

The SRWG could, possibly on the basis of information provided by EQAR, give an overview of countries in which assessments by “non-national” agencies is accepted and the scope of the decisions by EQAR-registered agencies which are recognized as of a date to be decided, probably in summer 2014. The SRWG may wish to reiterate the basic principle that such assessments should be accepted and outline steps that competent public authorities could take in this sense. It may wish to suggest wording for the Yerevan Communiqué on this point.

**Qualifications frameworks**

***The place of short cycle qualifications in the QF-EHEA*** (ToR no. 1 and the 2012 report by the Working Group on Qualifications Frameworks)

When Ministers adopted the QF-EHEA in Bergen in 2005, they acknowledged that countries may include short cycle qualifications within the first cycle in their national frameworks but declined to make specific provision for short cycle qualifications within the QF-EHEA. Since 2005, short cycle programs have gained prominence in many countries and the EQF, adopted in 2008, includes a level 5, which is normally the level to which short cycle qualifications, whether in higher education or VET, are referenced. The SRWG may therefore wish to consider recommending that short cycle qualifications be explicitly included in the QF-EHEA. It should be emphasized that a recommendation to this effect would not oblige countries to include short cycle qualifications in their national frameworks nor should this be an element of the stock taking exercise. It would, however, acknowledge the *de facto* importance of short cycle qualifications in many countries within the EHEA.

***Referencing of access qualifications*** (ToR no. 1 1 and the 2012 report by the Working Group on Qualifications Frameworks)

The referencing of school leaving qualifications giving access to higher education has been identified as a major challenge to the usefulness of the overarching frameworks. As pointed out in the 2012 report by the Working Group on Qualifications Frameworks, if some school leaving qualifications are referenced against EQF level 5, the logical implications would be that school leaving qualifications from countries in which they are referenced against level 4 would not be fully recognized for access and, conversely, that countries referencing their access qualifications against EQF level 5 would expect these to be recognized for credits toward a frit degree as they would de facto be considered to be at the level of short cycle qualifications. Should these not be the expected consequences, there would be no logical basis for the referencing. In principle, there would therefore be good reason for the SRWG to make a recommendation on this issue. However, there now seems to be a constructive dialogue on the issue within the EQF framework and it is important not to make recommendations that might upset this dialogue. The SRWG should therefore reserve judgment on whether to make a recommendation until a relatively late stage of its work – but it should keep the possibility open.

***Third cycle qualifications*** (ToR no. 8)

This part of the report should be developed on the basis of suggestions by the relevant sub-group.

***Implementation of qualifications frameworks*** (ToR no. 8)

This part of the report should be developed on the basis of suggestions by the relevant sub-group.

**Recognition**

***Review national legislation to fully comply with the Lisbon Recognition Convention and promote the use of the EAR-manual to advance recognition practices*** (ToR no. 1 and the Bucharest Communiqué)

This is possibly an area where research could be commissioned (see overarching issues, below) or where the ENIC and NARIC Networks could be asked to provide a contribution. The analysis of the 2007 national action plans for recognition[[2]](#footnote-2) clearly identify discrepancies between what countries have committed to through the Bologna Process and the actual state of implementation, including when it comes to adapting national legislation of the only legally binding text of the EHEA.

***The use of qualifications frameworks to improve fair recognition*** (ToR, no. 3)

Qualifications frameworks should provide clear answers to some of the questions credentials evaluators would normally ask about a foreign qualification, notably about quality, level and workload, and should also be helpful in assessing learning outcomes. The Lisbon Recognition Convention Committee adopted a new subsidiary text to the Convention on this topic in June 2013[[3]](#footnote-3). The SRWG may wish to consider how this Recommendation could best be implemented and how recognition policies could be further developed. It may wish to ask the Network of national correspondents for qualifications framework to consider this issue at its meeting in November 2013.

***Recognition of prior learning*** (ToR no. 8)

This part of the report should be developed on the basis of suggestions by the relevant sub-group.

***Automatic recognition*** (Pathfinder group)

The issue of automatic recognition is under the remit of the pathfinder group, which will report directly to the BFUG. As with the revision of the ESG, the SRWG may nevertheless be invited to comment on the proposal, either separately or as a part of its report.

**Transparency**

***Diploma Supplement*** (ToR no. 1)

The Diploma Supplement is a transparency instrument under the Lisbon Recognition Convention as well as a part of Europass. There are at least two potential issues linked to the Diploma Supplement.

The first is that in spite of ministers having committed to issuing the Diploma Supplement automatically, free of charge and in a widely spoken language by 2005, 8 years later this is still far from being a reality in the EHEA – and it seems likely this will also be the case in 2105, 10 years after this commitment should have been honored. The SRWG may therefore wish to consider a recommendation on how countries can now live up to their commitment; e.g. by recommending that countries submit plans and timetables for implementation.

The other issue is whether the Diploma Supplement should be reconsidered in the light of developments since it was adopted in the late 1990s. These developments include a stronger emphasis on learning outcomes, the development of national qualifications frameworks compatible with the QF-EHEA and the/or the EQF, and a much stronger emphasis on external quality assurance, including the development of ENQA and EQAR and the adoption of the ESG. On the other hand, due account should be taken of the fact that because the Diploma Supplement was developed jointly by three international institutions in two different formal settings, as described above, modifying it will be an elaborate process in which, as far as the Lisbon Recognition Convention is concerned, the next opportunity would be the meeting of the Convention Committee in 2016. A recommendation at the ministerial conference in 2015 would therefore be timely but work on a revision would need to be launched earlier. The procedures for adopting a revised version within the EU system would need to be clarified – it is clear that neither body (the EU or the Lisbon Recognition Convention Committee) can adopt a revised Diploma Supplement without the consent of the other.

***Improve transparency instruments for describing individual qualifications as well as higher education systems*** (ToR no. 5)

The terms of reference make specific reference to the Diploma Supplement and the ECTS, the latter of which will at least in part be covered by the sub-group on the ECTS Users’ Guide. More broadly, this task could be interpreted as making recommendations on how public authorities may, as a whole, make the information provide on their education systems more transparent. The SRWG may also wish to consider what the role and responsibility of public authorities might be in ensuring that higher education institutions provide reliable and meaningful information to prospective students and their parents, to employers and to others who may want or need reliable information on higher education institutions and programs, including on the value and rights associated with their qualifications. The SRWG may also wish to consider how public authorities, higher education institutions and student groups may help make these groups ware of issues it is important to verify before committing to a program or employing someone on the basis a qualifications. The BFUG has been given the mandate to continue monitoring a number of other transparency tools which have been developed by different actors, also outside the realm of the Bologna Process, therefore the SRWG may wish to give an overview on this issue.

***Review of the ECTS Users’ Guide*** (ToR no. 8)

This part of the report should be developed on the basis of suggestions by the relevant sub-group.

**Overarching issues**

***Learning outcomes*** (ToR no. 2)

Learning outcomes are an important element bringing the four main policy areas together. They represent a shift in focus from procedural considerations to considerations of what learners know, understand and are able to do on the basis of a qualification as well as of the attitudes they have developed in the course of their education. Ideally, a confirmation of learning outcomes, which would be linked to qualifications frameworks, be obtained in programs that have been quality assured and that would in themselves be an important part of the internal quality development in higher education institutions, and that would be described and assessed in transparent ways, will be a building block of the EHEA. At the same time, it is clear that – like automatic recognition - this is very much a goal for the future and that much work is still required for this to become a reality. Much progress has been made and in some countries learning outcomes have become an integral part not only of policy discourse but also of higher education practice. In other countries, however, a genuine understanding of learning outcomes is still not a part of the reality of higher education. The issue is particularly difficult because it touches on fundamental aspects of higher education culture and practice and a change of description does not automatically entail change of practice. A coherent development of learning outcomes may well be one of the fundamental challenges the EHEA will face over the next years and one that will decide whether the EHEA will be built not only on coherent structures but also on coherent implementation of structures.

***Employability*** (ToR no. 7)

Like learning outcomes and the global dimension, employability is one of the overarching dimensions of structural reform – as well as of the agenda of the other working groups. In increasingly complex societies, advanced competences will be a prerequisite for most kinds of employment. The further development of Europe’s economy – and beyond that, of European societies – will therefore depend on higher education providing a basis for meaningful employment. Hence, the structures of the EHEA must further this goal, with implications for the quality of education, the framework and structures of qualifications, recognition and transparency. At the same time, the interpretation of “employability” must take account of the fact that employment requirements as well as the academic content of qualifications are likely to develop rapidly and that education serves a variety of purposes, including democratic citizenship and personal development. The balance between subject specific and transversal competences, employers’ involvement in the development of study programs and structural changes, the transparent description of competences as well as study programs and education systems and the transferability and comparability of quality assessments are all likely to be part of the SRWG’s consideration of the issue.

***The role of structural reform in furthering other policy areas*** (ToR no. 6)

This task may perhaps be best acquitted through contacts and discussions with the two other thematic working groups as well as with the Implementation Working group but it may be worth pointing out, at least in the introduction, what some of the implications structural reforms may be on other policy areas.

As two obvious examples, education systems may, through their structures and regulations, make it easier for students to move within and between systems and to access various levels of higher education entirely or partly on the basis of non-formal qualifications – or they may impede such movement and access. Juxtaposing information from the 2012 Implementation report, for example, shows that the countries in which the alternative learning paths are the least developed within their respective national systems are also the countries most likely to experience a sharp drop in the number of people of “classical student age” and whose institutions will hence face the most difficulties in recruiting students from within their own countries in the years to come[[4]](#footnote-4).

Likewise, quality assurance, qualifications frameworks, recognition and transparency instruments all have the potential of making mobility easier – or more difficult. However, it may be preferable to outline these broader political aspects of structural reform in the introduction or the final part of the report.

***Global dimension*** (ToR no. 7)

While the structural reforms are developed for the EHEA and its member countries, they have global implications both because EHEA members interact with countries outside of the EHEA and because the EHEA has given rise to very considerable interest in other parts of the world. This interest has given rise to the Bologna Policy Fora held end-on with the ministerial conferences in 2009, 201 and 2012 as well as the suggestion in the 2012 Policy Forum Statement that

Regional exchanges and peer learning should strengthen the political commitments agreed at the Bologna Policy Fora, while also involving practitioners and representatives of the academic communities in a long term policy exchange. We agree that this policy cooperation should focus on specific topics and that it may in particular involve countries or regions which have expressed a particular interest in the topic at hand.

It is important for the EHEA that our structural reforms and the reasons that led to their development are understood in other parts of the world and it is equally important that EHEA members and consultative members are informed about and understand structural issues in other parts of the world.

***Joint degrees and programs*** (ToR no. 9)

This part of the report should be developed on the basis of suggestions by the *ad hoc* group appointed by the BFUG on the joint proposal of the SRWG and the WG on Mobility and Internationalization. The proposals need to be coordinated with the latter and may be submitted either as a part of the SRWG report, of the report by the WG Mobility and Internationalization or separately.

***Help identify and set priorities for peer learning activities*** (ToR no. 11)

This will be done annually though proposals to the BFUG and will not necessarily be covered in the report.

***Organize, or stimulate the organization of, Bologna conferences, mini-seminars, peer learning activities and events on issues related to structural reforms*** (ToR no. 12)

This will be a brief part of the report, if included at all, and there is a clear link to several other specific tasks.

***Commission research*** (ToR no. 14)

The SRWG may wish to do so – and would then also need to raise the funding required, e.g. through countries and organizations participating in the SRWG. At its September meeting, the SRWG may wish to consider whether research could be commissioned in one or more policy areas; the self-certification and referencing of national qualifications frameworks might be one such area and the review of national legislation on recognition another.

To the extent research is commissioned, this may be mentioned in the report under the relevant policy area.

**Structural reforms in the EHEA**

In this concluding part of the report, the SRWG should discuss the relationship between the various policy areas, consider where specific policies have served to develop coherent structural reforms and where they may have worked at counter purposes. In this part, the report should also seek to outline its broader recommendations for how structural reforms should develop over the next few years, most suitable up to 2020. The recommendations should cover both content and methodology and should address the issue of how structural reforms might best be taken forward in the 2015 – 18 EHEA work program.

**TIMETABLE AND METHODOLOGY FOR THE SRWG**

As mentioned, the discussions of the SRWG should now focus on developing the report. The Co-Chairs will aim to develop the draft report as discussion progress and in preparation for these. We will continue to meet at least once between every meeting of the SRWG and will also liaise with the chairs of the sub-structures as needed.

The SRWG meeting on September 24 – 25 will include substantial discussion on qualifications frameworks, in particular through the joint session with the EQF Advisory Group.

In the SRWG meeting on December 9 – 10, 2013, we will be able to take stock of the discussion of the draft revised ESG at the BFUG meeting in Vilnius on November 7 – 8.

The SRWG should meet once or twice in spring 2014 and should finalize its draft report in September or early October 2014, depending on when the BFUG will meet in fall 2014. As Co-Chairs, we have asked that this meeting be held relatively late in the semester in order to enable the three thematic working groups to finalize their reports.

**APPENDIX 1**

**OUTLINE OF THE DRAFT REPORT**

Introduction

Specific policy areas

* Quality assurance
* Qualifications frameworks
* Recognition of qualifications
* Transparency
* Overarching issues

Structural reforms in the EHEA

**APPENDIX 2**

**INFORMATION REQUIRED**

For each major issue, the following elements should be included:

* Concept
* Description
* Issue/problem
* Recommendation/solution

1. These are:

   1. As appropriate, commission research to support its work;
   2. Maintain contact with and, as needed, oversee the work of any sub groups established to address specific aspects of structural reforms;
   3. Advice the BFUG on any issues referred to it by the BFUG;
   4. Submit proposals to the 2015 Ministerial conference, through the BFUG, aiming to improve the coherence of the structural reforms within the EHEA.

   [↑](#footnote-ref-1)
2. Rauhvargers, Andrejs and Agnese Rusakova (2010). *Improving recognition in the European Higher Education Area: an analysis of national action plans*Strasbourg Council of Europe Publishing Council of Europe higher education series no.12 [↑](#footnote-ref-2)
3. <http://www.coe.int/t/dg4/highereducation/Recognition/DGIIEDUHE(2012)14%20Rev09%20FINAL%20-%20LRC%20Supplementary%20Text%20on%20the%20Use%20of%20QFs%20ENGLISH.asp#TopOfPage> [↑](#footnote-ref-3)
4. This point was made by David Crosier in his presentation to the annual conference of the European Access Network in Strasbourg on June 3 - 5, 2013. [↑](#footnote-ref-4)