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Policy Paper on Quality of Higher Education

1. Introduction

High quality higher education is of utmost importance for students, institutions and society. An education of high quality provides the right tools for students to meet future challenges. A high quality higher education system is characterised by removing all obstacles to access, and facilitating progress and completion, implementing a student-centred approach to learning and fairly assessing students. This system must also be braced by adequate student support services; ensuring links between learning, teaching and research activities; individual, social and civic training for responsible and active citizens; mobility opportunities; academic freedom; and where students are considered full members of the academic community and competent, constructive partners.

ESU believes that the quality of higher education should be one of the highest priorities in the debates within the European higher education society. High quality and accessibility are two sides of one coin. It is of the highest importance that all higher education is accessible and of high quality in order to give the best possible conditions to enter and complete higher education.

Sadly, the concept of excellence in higher education is often misused to refer to so-called 'elite' programmes and centres, which focus on a small number of individuals and institutions that are considered talented or of high quality. ESU believes that an open knowledge-based society will not be established with this concept of excellence that can only be achieved through stronger competition. Cooperation instead of competition is the basis for development of higher education institutions and students.

Every student should have the possibility to completely utilise their own intellectual potential without being limited by restrictive learning programs. ESU opposes any educational system, which separates different levels of perceived talents within higher education. ESU regards the road towards elitism as disastrous for the European higher education landscape and stresses instead the development of high quality education, accessible for all.

Learning and teaching

In the traditional higher education system, study programmes, courses or modules, learning and teaching methodologies, as well as student assessment, have been predominantly designed, organised and carried out from a teacher's perspective around the question of which issues should be taught to students. Hence it has not always been clear and explicit what the goals of the learning process from the perspective of a student are.

The paradigm shift towards a student-centred learning approach relates to both a mind-set and a culture within a given higher education institution. It is characterised by innovative methods and interaction between teachers and students to support the achievement of intended learning outcomes, where the students are viewed as corresponsive and active participants in their own learning process. Through the use of active learning and linking learning and teaching with research, students develop transferable skills, such as problem-solving and critical and reflective thinking.

Qualification frameworks

Qualifications frameworks should fulfil a variety of purposes and aims. These can be of more structural nature, i.e. facilitating the compatibility and comparability of degrees, but they should also be used in a way that supports the transition between and access to various fields of education and learning. Qualifications frameworks provide a bridging element between traditional higher education and lifelong learning (LLL). Qualifications frameworks should also help facilitate the mobility of students and academic staff in higher education.

The use of qualifications frameworks throughout Europe implies that some degree of coherence is vital. National qualifications frameworks need to be in line with the EHEA Qualification framework (QF-EHEA) and the European Qualification Framework (EQF-LLL). This coherence must not reduce the diversity and pluralism of disciplines and delivery. Qualifications frameworks as such must not be static but rather continuously adjusted and improved.

Recognition

Students should have the possibility to have their prior learning recognised, independently of how it was achieved (either through formal, non-formal education or informal learning), even if they do not hold a formally certified qualification providing access to a certain education programme. Moreover, automatic recognition of comparable degrees should be granted between countries in the European Higher Education Area.

Quality assurance

Quality assurance has been developed in Europe as a result of strong partnerships between key higher education stakeholders, while recognising students as full partners. Quality

assurance must continue to be a priority and primarily focus on enhancing higher education institutions and programmes, while ensuring that students are able to achieve the intended learning outcomes and their learning experience remains at the forefront of institutional missions. For this to be effective it is crucial that student representatives and students' unions are recognised by higher education institutions. The results from quality assurance processes should be presented to the wider public in a clear and accessible way. The assessment of higher education institutions and study programmes should be based on their mission statements and intended learning outcomes, while taking into consideration the quality assurance framework of the higher education system. The relevant stakeholders must undertake this work.

Transparency and information provision

Proper information provision about higher education systems and institutions is a prerequisite for students to make qualified choices about institutions based on their own preferences and needs. Students require truly relevant information for their study choices. They need access to qualitative information about higher education institutions and programmes provided in an independent and non-biased manner. Students are not a homogenous group; they have different needs and preferences and are perfectly able to use qualitative information in making their choices.

2. Learning and teaching paradigm shift towards student-centred learning (SCL)

ESU calls for a paradigm shift towards a student-centred approach to learning and teaching, where the focus is on the goals of the learning process from the student's perspective. Learning outcomes, credit systems, qualification frameworks, flexible curricula and recognition of prior learning are examples of approaches and instruments that form the conceptual and operational basis of a paradigm shift from teaching to learning and a student-centred education system. However, ESU emphasises that a paradigm shift cannot be achieved only by structural measures, but requires adequate funding, constant promotion within and acceptance by the whole academic community, including students.

Higher education institutions, student organisations and quality assurance bodies have a responsibility to promote a shift towards student-centred learning, predominantly through the provision of development training, specific support to teaching staff and proper infrastructure for students, as well as the dissemination of good practices. Governments should provide the necessary resources to support the implementation of student-centred learning.

Pedagogical training for teaching staff in higher education institutions should be a requirement, and institutions should offer continuous staff development trainings. Strategies on student-centred learning should be designed on national and all institutional

levels, and the implementation of student-centred learning should be continuously evaluated. Students should be represented in each of those processes.

Learning outcomes: a driver for a paradigm shift

The concept of learning outcomes is at the core of a student-centred education system. All study programmes should be designed with an intention to achieve a set of specified learning outcomes. Learning outcomes are custom formulated statements that describe minimum requirements of knowledge, skills, competences and attitudes, that the student is intended to acquire during the learning activity. Students should be involved in the process of designing study programmes and defining their intended learning outcomes. Where relevant, external stakeholders should also be consulted in the process of defining the intended learning outcomes. The intended learning outcomes should be formulated in a clear and understandable way, and be made accessible for students and other interested parties.

ESU believes that learning outcomes should accommodate multiple purposes of higher education, including preparing students for active citizenship and their future careers, developing a broad and advanced knowledge base and critical thinking skills, as well as stimulating research and innovation.

Learning outcomes should be clearly and transparently defined within the frameworks of broadly recognised learning and educational theory while taking into account the existence of many different types of learning pertaining to all aspects of human life and development.

Learning and teaching processes and student assessment

Learning and teaching activities and student assessment methodologies should be aligned to support the achievement of intended learning outcomes, while taking students' needs into consideration. This implies that student assessment must support and fairly assess the achievement of the intended learning outcomes. Thus student assessment can be conducted in courses, modules or any other level in the learning process.

The forms of assessment used must evaluate students' achievement of the set learning outcomes. Students should be clearly informed of the assessment activities to be used in their programme, what examinations or other assessment methods they will be subjected to, what will be expected of them and the criteria that will be applied to the assessment of their performance. Meanwhile, the assessment practices should take into account students' individual needs. As well as being informed about assessment strategies, students should also be directly involved in selecting these. Students should also have the right to appeal any assessment if they feel it was not conducted in accordance with the previously mentioned characteristics.

Learning outcomes can be achieved through formal and non-formal education and informal learning. Therefore, it is important that higher education institutions have clear and transparent recognition procedures in place.

Credit system and ECTS

Credit systems can be beneficial for achieving more transparency and compatibility between

different educational structures. Taking the students' workload and learning outcomes as the basis of credit allocation represents a change of paradigms and is essential for implementing the student-centred learning approach. Currently, credit allocation is often based upon the teaching input, which often has consequences for the duration of a study programme. The actual workload necessary to successfully complete part of a study programme is often neglected.

The workload should be based on the investment of time in the entire learning process, including contact hours. This means that all activities are taken into account; not only the time students spend in lectures or seminars, but also the time students need for individual learning and preparation for examination(s), and any other kind of activities which assist in successfully achieving the intended learning outcomes.

A credit system can facilitate recognition procedures and can also open the possibility for flexible learning paths. Therefore, it also facilitates access to higher education for non-traditional learners.

ESU also welcomes the use of credits as a transfer and accumulation system (ECTS). In order to achieve more compatibility in the use of credit systems, ESU calls upon national governments in Europe to meaningfully implement the ECTS as the credit system in higher education or, in case of existing national credit systems, to make them compatible with the ECTS under the conditions laid out in this document. Higher education institutions are responsible for the implementation of the ECTS for all study programmes and their integral parts, for example internships. ESU also invites countries to seek connection and correlation between Vocational Education and Training (VET), Applied Sciences and Higher Education systems in order to allow these students to progress further into higher education.

Diploma supplement

Students should have the right to receive documentation explaining the qualifications gained, including achieved learning outcomes and the context, level and status of the studies that were pursued and successfully completed. This certification should be automatically issued upon graduation (the so-called diploma supplement developed by the European Commission, Council of Europe and UNESCO-CEPES and confirmed in the Lisbon Convention) or upon request before graduation, but always free of charge and following a standardised model. The achieved learning outcomes must also be clearly stated in these documents. This also includes situations in which more credits and/or learning outcomes have been accumulated than the minimum requirement for obtaining a degree.

Enabling flexible curricula and individual learning paths

ESU stresses that curricula of study programmes should allow for a certain level of flexibility with regards to students' academic interests and strengths. As such students should also be an integral part in shaping the curricula. Flexibility however requires proper information and guidance for students to make an informed choice. Therefore it is important that all courses or modules have written descriptions of learning outcomes accessible to students in advance. Moreover, higher education institutions should provide counselling, guidance, mentoring and tracking to support students' access, progression and completion.

Students should have the option to take courses from other fields of study. Multi- and interdisciplinary approaches should be also used in the curricula design. This will lead to the acquisition of a solid base for further education and/or necessary competencies for working life, according to the student's wishes.

E-Learning, Open Educational Resources (OER) and Massive Online Open Courses (MOOCs)

ESU supports sharing digital learning resources (i.e. podcasts of lectures) and Open Educational Resource policies for improving the accessibility of educational resources. ESU also believes that MOOCs are an advantage for opening higher education to a wider group of students and reducing the barriers of participating in learning at a higher level. However, MOOCs should not be seen as a way to replace or reduce the availability of traditional learning.

ESU believes that a common initiative within the European Higher Education Area should be developed for ensuring and enhancing the quality of this type of education provision, and the recognition of the achieved learning outcomes, while taking into consideration its specifics. A clear connection between these means of education provision and the qualification frameworks based on the learning outcomes should be established.

3. Qualifications frameworks

ESU reaffirms its support of the development of national and international qualifications frameworks in order to apply the learning outcomes approach to the education system as a whole. The most important advantage that ESU sees is the achievement of greater cohesion and the support such frameworks can provide for a system based on learning outcomes and the implied shift from a teaching-based system to the learning-based system. However, ESU considers the use of learning outcomes in qualifications frameworks as a condition sine qua non for their development and implementation. It is essential that learning outcomes are defined in such a way that they reflect all purposes of education.

National qualifications frameworks should cover the entire education system of a country in order to demonstrate the relationship between all sectors of the education system. This allows for closer cooperation between sectors, which results in extended possibilities of smooth access to different educational programmes for students and transition between sectors and cycles. National qualification frameworks should also facilitate non-traditional routes into the higher education, which would contribute to widening access policies. The entry requirements for any education programme should be clearly defined through referencing a level within a qualifications framework. Entry to that programme must be open to all who hold a qualification aligned with the respective level, independent of the country and/or sector within which it has been achieved.

ESU stresses that the development of national qualifications frameworks must not be used to incorporate regulatory aspects that have not been in place before, especially with regards to admission criteria for levels of higher education. Such an approach would only undermine the acceptance and thus the envisaged benefits of qualifications frameworks.

ESU believes that it is crucial that students as well as higher education institutions and other higher education stakeholders are partners in the process of the implementation of national qualifications frameworks, referencing and self-certification. The European Higher Education Area qualifications framework needs to be useful for all signatory countries of the Bologna Process, as well as outside of the European Higher Education Area to maximise the opportunities of internationalisation for higher education systems in Europe, making them comparable with one another. ESU invites for greater coordination between the EU and European Higher Education Area Qualifications Frameworks. Therefore it must not be limited to EU and associated countries, despite the fact that it is part of the European Commission's work under the Lisbon strategy.

Cycles

ESU considers the use of cycles in qualifications frameworks as a necessary element to make the European degree structures more comparable and compatible. Therefore ESU stresses that qualifications frameworks need to include the first, second and third higher education cycles. These cycles can be understood as levels within the qualifications frameworks.

Reasons for introducing the three-cycle degree structure also go beyond recognition of degrees. One of the arguments is the introduction of intermediary exit points and bridges between different sub-sectors to allow more people, and in particular to motivate underrepresented groups and students outside traditional learning paths, to enter higher education cycles and complete a degree. ESU supports the development of three cycles in alignment with the qualifications frameworks, which increase the flexibility of educational paths and the possibility for an individual to be an active and self-directive learner, while also rejecting the fragmentation of degree to an unlimited extent, which could directly affect the value of the degree, obtained.

Whereas a common degree structure should cater for comparability and transparency, such a common structure should not be a catalyst for harmonisation. Within a convergent structure there should be room for national and institutional diversity within the remit of the European Higher Education Area Qualifications Framework.

ESU strives for non-EU Bologna countries to be consulted and given more support and financial help to deal with these reforms. It is also essential that higher education institutions and student bodies inside higher education institutions are fully involved in the reform process.

Short cycle degrees are a very heterogeneous group of programmes and studies, designed mostly to provide for short-cycle professional or vocational qualification after secondary education. In some countries, a part of these programmes are recognised as higher education, while in other countries they are regarded as post-secondary education (even if leading to similar professional qualifications according to qualification frameworks). These study programmes must allow students to continue further studies in higher education

either immediately after graduation or later. These short cycle programmes can constitute an access route to full-length first cycle degrees. Short cycles can be utilised in those countries where it fits into the national higher education framework and can be a tool to guarantee flexible entry and exit to higher education.

The first cycle degree with a more academic orientation should introduce scientific and reflective thinking, general academic skills and competencies. It should contain courses in a specific field of science given in a broader perspective and linked to other relevant scientific fields. It should provide students with an overview of the field and prepare them for the second cycle. Academic orientated programmes in the second cycle can concentrate more on one narrow area of science without excluding the possibility of an interdisciplinary orientation. The aim of these programmes must be that students can also conduct independent scientific research in their field of study.

The more professionally orientated programmes of the first cycle should prepare the student for a position in the labour market in the field of study. These programmes should introduce reflective thinking and general professional skills and competencies. The content of the courses should be related to the required knowledge for that field of work and applied sciences. A professionally orientated second cycle must deepen the knowledge of a certain professional field and introduce specific professional skills and knowledge in a specific professional field.

To ensure access in all fields, reasonable transition mechanisms between the first and second cycle should be established within the different types of higher education institutions. Completion of the first cycle of studies must always give the student access to the appropriate second cycle. Therefore no tuition fees or other restrictions can be imposed to enter the first or second cycle in accordance to the qualification framework.

Doctoral degrees

Discrimination or specific access barriers for students coming from non-university higher education institutions are unacceptable. Flexibility between second and third cycle studies should allow graduates of second cycle programmes admission to doctoral programmes in their field of studies as well as in other disciplines. Recognition of prior learning should be applicable to doctoral studies. Access to doctoral programmes should also be possible for applicants not holding a second cycle qualification provided they have the necessary competences according to the qualification framework.

ECTS credits might be introduced when doctoral study programmes contain certain courses or modules, such as research methodologies or didactics, in order to foster recognition and mobility of PhD candidates and transparency of the PhD programmes.

Research

ESU believes in the independent research, relevant for and benefiting society. In order to

develop quality in higher education, students' education must be based on cutting-edge research, academic and artistic knowledge and development. This requires the use of suitable pedagogical methods and that the relationship between research and development and education deliberately and systematically are incorporated into education. ESU calls for a stronger link between the European Higher Education Area and the European Research Area.

Student participation in research is critical in ensuring a research-based education, and is a cornerstone in inspiring lifelong learning. Student participation should not only be conducted through participation in research programmes, but also through easier access to professors; through encouraging professors to continuously meet students also outside of lectures. It lowers the threshold to actively search for and use research both before and after graduation, in employment situations and daily societal life. It also encourages further study, professional development after graduation, and the recruitment of a broader group of students into research carriers.

Outcomes of research should be open and available. Open access to research results will give a tremendous benefit for students. Today many students in Europe lack access to a wide selection of research journals and this is inhibiting the quality of studies and academic integrity. Furthermore, research must be seen as a public good and the majority of the work behind research and publishing is done with public financing. There is no reason why the greater public should not be able to access the research results freely. The expenses for subscriptions and access to research journals today is in many European countries, and especially in developing countries, a great cost and burden. In turn, these costs have helped fuel the excessive profits of some of the biggest publishing companies in the world. ESU supports the UNESCO and EU initiatives to demand that all publicly funded research, in principle must be published openly accessible. This must be propelled by having all results of research supported by the EU framework programmes published in open access format. This cost of this should be eligible expenses in EU programmes. It is furthermore crucial that a paradigm shift to open access publishing makes research easier accessible for students.

Intellectual property

Whenever students generate intellectual property, understood as intangible property in the course of their study or research, they should have the same rights on their intellectual property as other academic actors. In addition, students should be informed about intellectual property related topics and be aware of the institutional and national regulations in place.

Employability and entrepreneurship

ESU understands employability as a broad concept which includes subject-specific, methodological, social and individual competences which enable graduates to successfully take up and pursue a profession/employment and empower their life-long learning.

Employability is also about making graduates more likely to gain employment in their chosen field(s), being able to create/start new businesses, and being able to develop and succeed in their occupations.

ESU believes that employability does not mean matching educational and labour markets, companies defining contents and teaching methods, training the routines of everyday work nor pure life experience. Employable higher education graduates have a scientific qualification with knowledge of the theories and methods of the discipline; are able to apply their knowledge on the job in order to assess and solve problems; are able to develop new qualifications; have acquired relevant soft skills; and are able to recognise their own training needs. In order to enhance employability, a student-centred learning approach must be fully endorsed and implemented by higher education institutions, which empowers active student participation in curriculum design and internal quality assurance of teaching, learning and assessment activities.

ESU also believes that employability is not the responsibility of the higher education system alone, but incorporates many factors such as social security and labour legislation, economic models and regional disparities.

Cooperation between external stakeholders and higher education institutions can be useful, but must be approached with care. Employers, trade unions and other external stakeholders can contribute with important knowledge and participate in the discussion about the design, delivery and recognition of higher education programmes, but the decision-making power must always rest with institutions, students and other internal stakeholders.

ESU is concerned at any attempt to measure educational quality or success in terms of employment or income statistics – while important; these do not provide an accurate reflection of quality in higher education.

Entrepreneurship should be seen as additional method to develop students' transversal skills, and not only as a solution to the graduate unemployment. ESU believes that entrepreneurship should not be a mandatory part of all curricula. However, entrepreneurial studies should be provided upon the students' request. Graduates should be provided with financial support and incentives in order to improve conditions for start-ups.

4. Recognition

There should be procedures for recognition, which must be accessible, clear and transparent to all applicants, but not a bureaucratic burden. They shall be based on the principles of the Convention on the Recognition of Qualifications concerning Higher Education in the European Region (also known as the Lisbon Recognition Convention). ESU emphasises that recognition shall be granted if no substantial differences can be proved by the institution that is charged with recognition.

Recognition of prior learning

ESU stresses that recognition of prior learning should be available for the purpose of gaining entry to a certain education programme, as well as for gaining recognition of certain parts of an education programme due to already achieved learning outcomes (e.g. courses or modules; comparable to academic recognition of study abroad periods).

Credit assignment should be correlated to the achievement of learning outcomes. Therefore credits must be granted for achievements in prior learning and especially for competencies resulting from professional experiences. Students should have the right to have their prior learning evaluated by higher education institutions and/or recognition authorities.

Every student nevertheless must have certain procedural guarantees, i.e. the right to fair and equal recognition of their credits based on the achieved learning outcomes. Higher education institutions must recognise any prior learning as degrees, courses and study periods unless substantial differences can be demonstrated. The criteria used must be public and objective. The student must have the right to appeal. Decisions on recognition must be made within a reasonable time limit specified beforehand by the competent recognition authority.

Automatic Recognition

It is essential for ESU that the recognition of comparable degrees is guaranteed and granted automatically, free of charge, in all countries of the European Higher Education Area based on the tools already developed within the Bologna Process. ESU, having regard of the Lisbon Recognition Convention, considers that there should be automatic recognition of comparable degrees between those European Higher Education Area countries that have already fully implemented the Bologna structural reforms (three-cycle system, ECTS, national qualification framework -aligned to the QF-EHEA-, quality assurance agency registered in EQAR, automatic issuing of the Diploma Supplement), as there would not be any substantial differences. This means that, for example, students holding a bachelor degree in one of those European Higher Education Area countries should be able to enrol in a master study programme in any other country of the area without having to initiate any additional procedure for getting a formal recognition of their degree. The Bologna Process should prioritise this action line in order to fully implement a true European Higher Education Area.

ESU believes that automatic recognition contributes to equal opportunities for high-quality education, increasing the mobility of students and graduates in the European Higher Education Area, as well as enhancing graduates' employment chances.

Within the European Higher Education Area, the diploma supplement should be a sufficient tool for overcoming language barriers when applying for recognition. Learning outcomes should provide the basis for recognition of non-European Higher Education Area qualifications.

5. Quality assurance

In a diverse student body there are different perceptions about quality of higher education while sharing certain common features. Quality assurance needs to take into account this student quality concept. By the term “quality assurance”, ESU refers to all activities leading not only to ensure the delivery higher education in all forms according to agreed standards, but also to enhance higher education provision within the continuous improvement cycle.

Quality assurance systems and procedures should focus on how higher education institutions support and promote students’ achievement of intended learning outcomes through teaching and learning and assessment methodologies, as well as the admission of students, progress and completion.

Quality assurance should have multiple purposes. Primarily among them is the enhancement of quality in the learning-process, including study programmes, learning opportunities and facilities available for students; creating and promoting a quality culture within higher education institutions; staff development; increasing mutual trust between actors in higher education; enabling reciprocal recognition; facilitating comparability of qualifications and addressing the aspect of social dimension of higher education. Moreover, as a logical consequence of institutional autonomy and the notion of higher education as a public responsibility, quality assurance should also intend to hold higher education institutions accountable. At the same time it should provide relevant information about their activities and performance to students, external stakeholders and society at large.

Change-leading quality assurance should be implemented with a holistic approach for improving the quality of higher education according to the needs of the students. The quality assurance processes should be fit for purpose, as little bureaucratic as possible and have concrete outcomes leading to real change and improvement.

It is key for ESU that higher education institutions and quality assurance agencies close the feedback cycle, providing public information about the main outcomes and actions taken as a consequence of the quality assurance activities. Quality assurance reports should contain the most relevant information, especially for students, and they should be clear and accessible.

One of the key features of the European approach to quality assurance of higher education, and the key for its success, is close cooperation between stakeholders. This cooperation fosters communication across stakeholders’ boundaries and a common understanding of quality assurance throughout the EHEA. Therefore ESU perceives E4 cooperation (EUA, ENQA, ESU and EURASHE) as an enriching activity that takes quality assurance forward and leads as a good practice at European level.

Achieving sound quality assurance systems requires taking advantage of and using the Bologna tools and recent European reforms like the learning outcomes concept, qualification frameworks, ECTS, the diploma supplement, etc.

Internal quality assurance

ESU believes that higher education institutions hold the primary responsibility for the quality of their education provision, for assuring the quality of its activities through sound internal quality assurance systems and to take opportunities for continuous improvement. Key activities of the internal quality assurance systems should include monitoring and evaluating activities of all education delivery, including the study programmes and their design, and student support services. This should lead to an action plan with clear aims in which implementation can be tracked.

As full members of the academic community and competent co-responsible partners, students should be fully involved in defining the quality assurance policy of the institutions and its internal system. Evaluation of teaching activities is an important part in the internal quality assurance evaluation system and provides a real opportunity for each student to evaluate their education, as well as affect the education for future students. Equally as important as ensuring student involvement in the assessment bodies is ensuring good intelligence of the feedback tools by using a mix of several instruments, such as student questionnaires, focus groups, suggestions boxes, complaint procedures, etc.

Such activities support the development of a quality culture that is embraced by all, from students and academic staff to institutional leadership and management. Quality culture can be seen as the capacity of the internal stakeholders to develop quality assurance implicitly in the day-to-day work of the institution, ingraining quality assurance and enhancement.

Internal quality assurance systems should be aligned with higher education institutions' mission and strategic priorities and act as an integral part of the managerial structures of higher education institutions. ESU also emphasises that while quality assurance bodies are a supportive structure within the higher education institutions, they can neither replace governance bodies and student participation within these bodies, nor undertake their responsibilities.

External quality assurance

ESU believes that internal quality assurance systems should be supported and complemented by external quality assurance activities. Independent quality assurance bodies or agencies should carry these activities out through peer review evaluation, where students are also fully involved. Higher education institutions should be willing to undertake external quality assurance activities to support and enhance their internal systems and their education provision.

The external quality assurance systems should focus on a combination of institutional evaluation and programme accreditation, where the latter might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

External quality assurance bodies or agencies should have an autonomous responsibility for their operations, and the conclusions and recommendations made in their reports must not be influenced by third parties' political agendas.

ESU demands student representation in the relevant governing and decision-making bodies of the quality assurance agencies. National governments are also responsible in setting up the frameworks for quality assurance in cooperation with students and other relevant stakeholders.

European standards and guidelines (ESG)

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should reflect all of the above-mentioned stands. Internal quality assurance within higher education institutions, external quality assurance of higher education, quality assurance agencies and national quality assurance frameworks should comply with and work accordingly to the ESG. It is responsibility of the institutions and quality assurance agencies to ensure the implementation of the ESG, and governments should create the framework to enforce the ESG and enable their implementation.

European Quality Assurance Register (EQAR)

The European Quality Assurance Register for Higher Education (EQAR) should provide a list of trustworthy quality assurance agencies that work in compliance with the ESG. As one of the founding members of EQAR, ESU would welcome the empowerment of EQAR, and thus invites quality assurance agencies to apply for registration, and national governments to recognise by national legislation and uphold those registered quality assurance agencies and their decisions, while respecting the national quality assurance frameworks.

ESU would like EQAR to focus more directly on students and prospective students, as one group of users, through providing an information tool offering support for study choice and promoting similar initiatives on the national level. EQAR should achieve this by attracting end-users directly to its resources or in cooperation with larger scale projects in which EQAR could play a key role in building trust through transparency. This should be seen as a crucial foundation for the EHEA to become a tangible reality for students.

6. Transparency and information provision

Meaningful information provision mechanisms that suit the needs of the students, as individuals, must be created. Information systems in which the diversity and multiple

purposes of higher education are acknowledged should be set up so they can become a useful tool in the students' choice.

In order to aid students' choice and thereby create transparency in higher education systems and education in Europe, it is crucial for ESU that institutions provide high quality and easy accessible information in many different languages regarding the learning outcomes, didactics and aims of the educational programmes.

Transparency tools

Quality assurance is a process of building and maintaining trust. ESU believes that quality assurance is a potent transparency tool, and there should be more work done to transmit the information about quality assurance outcomes to the wider public and the students. This should be especially linked with information databases that provide descriptive information about higher education such as study programmes and courses. Higher education institutions are free to build their own equally valued profiles and to be assessed against them. Quality assurance pays attention to processes and provides a thorough, informed analysis.

Rankings

Rankings on the other hand are often based on a snapshot of higher education institutions without supporting quality enhancement or involving stakeholders. Rather than having a positive effect as quality assurance is intended to, rankings can lead to the creation of a self-fulfilling prophecy that blocks the ability of higher education institutions to make positive changes. Higher education institutions finding themselves relegated to the lower ranks could find it even more difficult to improve the quality of education they are delivering to students. Lower ranks make higher education institutions less attractive to the stakeholders involved, thereby compromising the possibility of further improvement.

ESU reaffirms its position that classifications must not lead to league table positions and act as the basis for developing rankings. We strive for truly horizontally diversified higher education systems and believe that putting higher education institutions in predefined profiles increases conformity rather than transparency and quality.

Under rankings and classifications, the rise and fall of the reputation of a higher education institution gives room for adjustments in funding and tuition fees. Rankings must not be used as a tool for commodification of higher education. This agenda, in which students are seen as consumers or products instead of stakeholders, opposes European values. Students are neither consumers nor products, but part of the academic community and must be engaged in the learning process.

Rankings and classifications of institutions are quite controversial as they pressure higher education institutions to perform in a reputation-race chasing criteria instead of focusing on their broader mission, and thereby overlooking quality. These tools undermine trust

between higher education institutions, affecting the cooperation, recognition and mobility between them. Ultimately, the reputation of a higher education institution could have a large effect on graduates' employment opportunities and affect student choice. It will enact greater elitism by increasing selectivity and exacerbating the social divide of the student body. These tools will allow for the concentration of funding in some higher education institutions, making rich institutions richer and poor institutions poorer.

Multidimensional and user-driven transparency tools

While rankings reflect the growing international competition among the higher education institutions, they also push them into reputation race where the higher education institutions are evaluated on the basis of a narrow and often no transparent set of indicators.

ESU stresses that higher education and research institutions have different profiles and missions, and any information tools developed should reflect these differences and incorporate a multidimensional approach when looking into institutions' performance.

ESU welcomes the development of user-driven information tools that reflect the individual needs of various users and student cohorts, as this would lead to the development of real transparency tools rather than league tables. ESU is strongly against using multidimensional transparency tools for creating another type of ranking.

Development of student-driven transparency tools

ESU commits to pioneering the creation of student-driven transparency tools that will serve as an instrument for building trust and facilitating student-centred learning. As a guiding principle, student-driven transparency tools must reflect the aspects of higher education that students' consider essential in choosing the place and subject of their studies.