



FOCI

Future-proof Criteria for Innovative European Education

D4.1 –Policy recommendations on applying the European degree (label) criteria on diverse innovative models of flexible and societally relevant transnational European higher education

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**Policy recommendations
on applying the European
degree (label) criteria**



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List of abbreviations

EA	European Approach for Quality Assurance of Joint Programmes
EC	European Commission
ECTS	European Approach for Quality Assurance of Joint Programmes
EGM	Expert Group Methodology
EHEA	European Higher Education Area
EEA	European Education Area
EQAR	European Quality Assurance Register for Higher Education
EQF	European Qualifications Framework
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
EU	European Union
HE	Higher Education
HEI	Higher Education Institution
NGO	Nongovernmental Organization
QA	Quality Assurance
TNE	Transnational Education



1. Introduction

The commencement of enhanced cooperation within European higher education was initiated 25 years ago, marked by the Sorbonne and Bologna Declarations, ultimately leading to the establishment of the European Higher Education Area (EHEA) under the Bologna process. This initiative introduced a structured framework for bachelor's, master's, and doctorate degrees, accompanied by the mutual recognition of educational systems, the European Credit Transfer and Accumulation System (ECTS), and a unified quality assurance mechanism. Nonetheless, variations persist in the implementation of the Bologna process across member states, impeding the offering of joint degrees. To confront these hurdles and meet European Education Area objectives by 2025, the European Commission initiated the European degree label (EDL) initiative in 2022. This call/initiative had the objective to test and explore deeper transnational cooperation instruments to further develop a genuinely European dimension in higher education, built on shared values. The initial phase in the policy experimentation was to explore how shared European standards could be employed to acknowledge specific added value of international joint programmes designed and delivered by different universities, providing students with a discernible level of quality and a European perspective. Supported by the Erasmus+ programme, the European Commission allocated funding to six policy experimentation projects, including the Future-proof Criteria for Innovative European Education project (FOCI).

The FOCI project

The Future-proof Criteria for Innovative European Education (FOCI) project is part of a larger policy experimentation initiative described above. It aims at investigating the possibilities and needs for implementing the European degree (label), the criteria for awarding this label, and compliance with regulatory frameworks. The consortium brings together three different European University Alliances, with eight universities:

YUFE Alliance: Young Universities for the Future of Europe¹

- University of Rijeka
- University of Antwerp
- Maastricht University

ECIU Alliance: The European Consortium of Innovative Universities²

- Kaunas University of Technology
- Lodz University of Technology

EPICUR Alliance: European Partnership for an Innovative Campus Unifying Regions³

- University of Amsterdam

¹ <https://yufe.eu/>

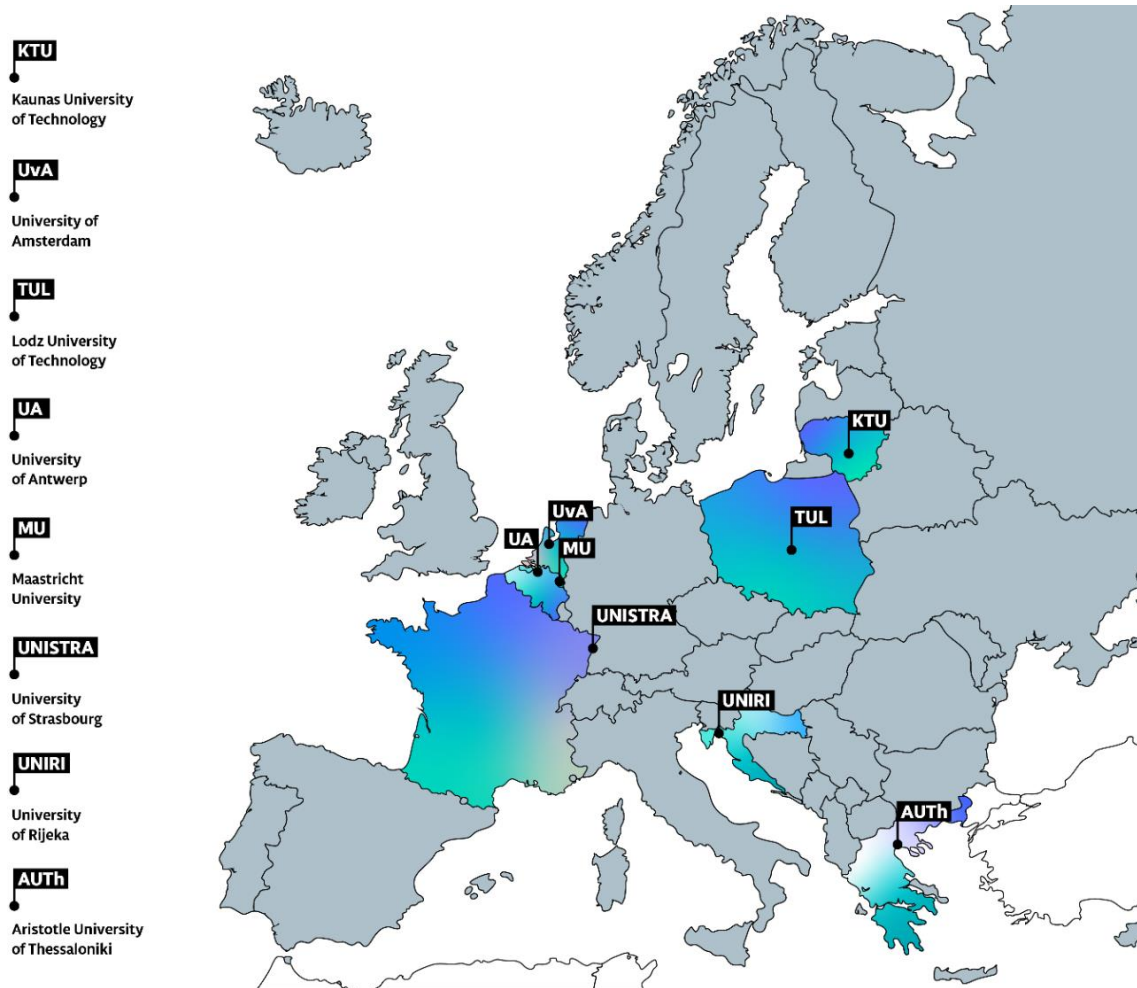
² <https://www.eciu.eu/>

³ <https://epicur.edu.eu/>



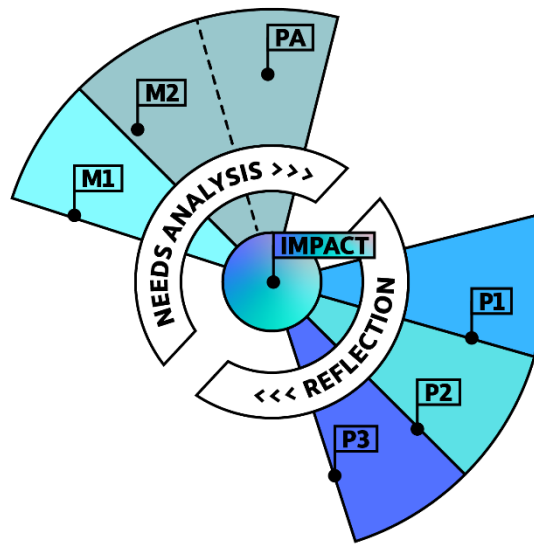
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- University of Strasbourg
- Aristotle University Thessaloniki



A selection of universities throughout Europe allows us to use diverse and broad networks and take into account good practices and country-related differences while searching for a unified approach towards the European degree (label) concept and/or framework.

FOCI project is based on a methodology combining continuous stakeholders needs analysis and reflection from experts of different background with the process of piloting, testing and validating various dimensions of the European degree (label) initiative. Stakeholder consultations and reflection were conducted based on interactions with various stakeholders (higher education institutions, ministries, student associations, quality assurance agencies, and representatives from the labour market) while the FOCI piloting process was implemented mainly via the FOCI expert groups which included both university experts and stakeholder representatives (see Section 3 for more details).



M1

Methodology of issuing the label

M2

Methodology of applying the label criteria

PA

Programme assessment

P1

Policy recommendations on joint degrees design and delivery

P2

Policy recommendations on legislative aspects

P3

Policy recommendations on refining the label criteria

The FOCI approach to the concept involves:

- Emphasis on the added value of European degree (label) – a thorough needs analysis with strong stakeholder involvement.
- Analysis of the common European degree (label) criteria and its application, together with formal requirements (legal, procedural, administrative fields). Different and diverse study programmes were analysed and received feedback about their compliance with the European degree (label) criteria, while this was simultaneously useful for proposing enhancements of the criteria themselves.
- Analysis and suggestions related to the European degree (label) principles in order to make it applicable not only to full educational programmes, but also broadening perspective and considering flexible learning pathways as well as micromodules.
- Simultaneous exploration (implementation simulation) to ensure European degree (label)'s ability to be fit for purpose while allowing criteria adaptability for existing and future joint programmes.



The overarching objective of the FOCI project is to generate robust and practical policy proposals for the European Commission and other key stakeholders in higher education regarding the development and enhancement of the European degree (label), thereby fostering improvement within the European higher education landscape. These recommendations will cover the suitability of the European degree (label) criteria, their scope of relevance, contextualisation and application, and methodological challenges and solutions.

Structure of the document

This report was developed through a thorough review of stakeholder needs analysis, European degree (label) criteria analysis, pilot assessment report, report on administrative, procedural and legal aspects analytical report, which provided insights into the challenges and opportunities associated with the European degree (label). Additionally, consultations with stakeholders, including government bodies, HE institutions, student associations, quality assurance agencies, and employers, were conducted to gather input and perspectives. It consists of a short executive summary, presentation of methodology and main policy recommendations.

2. Executive Summary

The document presents a comprehensive report on the European degree (label) initiative and its policy recommendations. The document outlines the research methodology, which has drawn on the expertise of three European Universities' Alliances and feedback from a wide range of stakeholders, including quality assurance agencies, government ministries and student organisations. The stakeholder consultations and the evaluation of the pilot programmes have been instrumental in formulating the policy recommendations and highlighting the need for clear objectives and values of EDL to ensure that it adds value and stands out from other transnational education models. The report emphasises the importance of defining the European degree and the European label separately and highlights the potential of micro-credentials and flexible learning pathways within the European degree (label).

The report's conclusions and recommendations focus on the purpose, scope and suitability of the proposed European degree (label) criteria. It calls for clear intentions behind the European degree (label) to differentiate it from other collaboration options and ensure that it is a mark of quality. Recommendations include not limiting the European degree (label) to full degree programmes, considering the inclusion of non-formal education and reducing the administrative burden on national agencies. Compatibility, or even integration, of the legal basis for the European degree (label) with(in) national legislation is central to the European degree (label) concept and the report proposes the establishment of a coordinating body at EU level and clear guidelines for higher education institutions on the application process.

Many of the recommendations contained in this document are connected (directly or indirectly) to key FOCI policy positions that were already voiced towards the European Commission and other European stakeholders and policymakers:



- **The scope of the initiative needs to be expanded** to include other models of higher education in addition to full programmes, in order to strengthen the relevance of the initiative and make it as future-proof as possible.
- **The clear purpose for the European degree needs to be defined**, together with a clear outlook on the added value that the European degree will bring to different stakeholders.
- **European degree criteria and the evaluation methodology** that is to be developed need to be constructed in a way which respects academic freedom and autonomy and adds as little complexity to the HE landscape as possible.

Finally, the report discusses the need for the European degree (label) to complement national policy objectives without interfering in national higher education policies and to create synergies with other European initiatives. The sustainability plan (Deliverable 5.2) aims to ensure the lasting impact of the project and its alignment with future policy initiatives. The report concludes by emphasising the need for clear communication, the use of existing frameworks and the need for the European degree (label) to develop its own identity within the European higher education landscape.

3. Methodology

The current report, as an overarching project deliverable, builds on the previous results of the FOCI project, in particular deliverables 2.1 Stakeholder needs analysis, 2.2 Analytical report on the procedural, organisational and legal aspects and 3.2 Analytical report on the application of European degree (label) criteria.

Stakeholder needs analysis enabled the project to identify the potential challenges, such as the risk of increased administrative burden and the need to harmonise the European degree (label) with national regulations and laws and to collect suggestions on refining and clarifying the criteria rather than adding new ones, with a focus on flexibility to meet the future needs of students. The report emphasises the importance of considering the diversity of stakeholder perspectives and combining them with the results of other similar projects to ensure a comprehensive understanding.

In summary, the first phase of the FOCI project was successful in gathering and analysing stakeholder views on the proposed European degree (label), identifying key benefits and highlighting potential challenges. The results fed into the ongoing development of policy recommendations aimed at improving the quality and recognition of higher education in Europe through the European degree (label) initiative.

The FOCI's **Pilot programme evaluation (Deliverable 3.1 and 3.2)** was instrumental in the development of policy recommendations for the European degree (label) concept. The report serves to test the application of the proposed criteria and the FOCI methodology by conducting a pilot evaluation of different educational programmes from different contexts across Europe. This assessment analyses the applicability, relevance and feasibility of the criteria for awarding



the European degree (label). For example, it analysed whether the institutions had jointly developed an accreditation policy and whether this was publicly available.

The assessment shows that the criteria are met to varying degrees. Certain criteria, such as innovative approaches to learning, are largely met, while others, such as the monitoring of graduate outcomes, are challenging. The report highlights the need for clarification and possible revision of some criteria to better suit different types of programmes, especially short programmes. In addition, the report emphasises the importance of providing clear and comprehensive evidence of compliance with the criteria.

The deliverables 3.1 and 3.2 are a first step towards validating the European degree (label) criteria and serve as a basis for policy recommendations. The results show that while many degree programmes meet the essential criteria, there is room for refinement and adaptation to ensure that the criteria are comprehensive and applicable to a wider range of educational models. The results contribute to the overall objective of providing actionable policy recommendations to strengthen the European higher education landscape.

At the same time, the pilot evaluation allowed to gather relevant feedback coming from various stakeholders, such as evaluation methodology experts, representatives of evaluated programmes, and evaluators, on various aspects: the proposed criteria, the indicators that were specifically developed to interpret these criteria, and the evaluation process itself. This was used to infer any improvements that could be adopted for each level of feedback and for the whole process of conducting an evaluation against the European degree criteria.

The comparative **Legal, regulatory, procedural and administrative analysis (Deliverable 2.2)** served as a pivotal point for understanding legal peculiarities of issuing a European degree (label). It analysed the regulations on higher education in the countries and institutions of the FOCI consortium. It assessed whether and how joint programmes can be legally designed and implemented by institutions from different EU Member States and whether the proposed European degree (label) criteria can be met pursuant to the current legislative framework. This included aspects such as whether programmes include mandatory physical mobility. It also examined whether the programmes are offered in at least two EU languages, use the ECTS credit system and meet other European degree (label) criteria such as quality assurance, common policies and the issuing of a common diploma supplement. The analysis found that Member States take different approaches and fulfil the European degree (label) criteria to varying degrees, with some encountering legal and administrative barriers, especially in the context of issuing joint degrees.

The outcome of 2.2 provided insights into the policy recommendations, which include a comprehensive legal and procedural analysis. Regulatory models, mandatory European degree (label) criteria and the feasibility of implementing these criteria within the existing national and institutional framework were noted and provided insights into the possible issuance formats of the European degree (label) and underlines the need for standardised terminology and clear regulatory guidelines to support the establishment of the European degree (label). The current



report with policy recommendations recognises the importance of terminology and definitions as well as the legal nuances in the different education systems.

FOCI consortium has also set up its internal pool of experts which contributed to each phase of developing the policy recommendations. This included staff with appropriate expertise from all partner universities. Within FOCI organisational structure, three distinct Expert Groups were set up: Expert Group Methodology (EGM), Expert Group Legal (EGL) and Expert Group Evaluation (EGE). These expert groups were composed of experts nominated by partner universities and representatives of stakeholder organisations, as described below:

- **Expert Group Methodology (EGM):** tasked with developing a methodology of applying the European degree (label) to joint programmes and other transnational education models – involving QA agencies and student representatives (ESU and ESN).
- **Expert Group Legal (EGL):** tasked with exploring legal, regulatory, procedural and administrative aspects of joint programme design and delivery – involving all interested stakeholders.
- Pilot programme evaluation teams - **Expert Group Evaluation (EGE):** tasked with applying the methodology and assessing (in smaller evaluation teams) the programmes against the set criteria - involving HE Ministries.

In order to widen the scale and input, there were 12 associated partners and 6 cooperating institutions involved in FOCI:

Associated partners:

- ASHE (Croatian QA Agency) - Croatia
- Croatian Ministry of Science and Higher Education - Croatia
- NVAO (Dutch-Flemish Accreditation Agency) - Dutch side - Netherlands
- Dutch Ministry of Education, Culture and Science - Netherlands
- NVAO (Dutch-Flemish Accreditation Agency) - Flemish side - Belgium (Flemish community)
- Flemish Government - Department Education & Training – Belgium (Flemish community)
- Adecco Group (human resources agency) - Europe
- European Students' Union (ESU) - Europe
- Erasmus Student Network (ESN) - Europe
- Lithuanian National Union of Students - Lithuania
- Greek Ministry of Education and Religious Affairs – Greece
- Hellenic Authority for Higher Education - Greece

Cooperating organisations:

- French Ministry of Higher Education and Research (MESR) - France
- HCERES (French national Accreditation agency) - France
- Conference of Rectors of Academic Schools in Poland (CRASP) - Poland
- Council of Europe - Europe
- EGEE - France



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To gather different perspectives and analyse possible criteria, scenarios and other considerations, four consultation events and/or platforms were organised:

- 28/03/2023: FOCI introductory event (online)
- 26/10/2023 FOCI policy workshop (Kaunas, Lithuania)
- 7/2/2024 Online FOCI policy workshop on the European degree (label)
- Continuous stakeholder brief and comments on policy recommendations through written consultations in three cycles



4. Findings and policy recommendations per each policy area

In this overview, the main offerings and findings of the FOCI consortium are presented. Based on internal consultations and stakeholder input, several key issues with relevant sub-categories were identified and a summary of recommendations is provided after each category, highlighting key discoveries and points to consider.

FOCI detected five key policy areas that were further explored and analysed:

1. Purpose of the European degree (label) and European degree
2. Scope of the European degree (label)
3. Fitness of the proposed European degree (label) criteria
4. Legal frameworks and their impact on the European degree (label) concept
5. Policy framework for the European degree (label)

1. Purpose of the European degree (label) and European degree

Clear goals and intentions behind the European degree (label)

Many considerations that will be explored in this chapter in some ways connect to a central theme of the need to have a clear understanding behind the goals and intentions for the European degree (label).

This notion was prominent within the stakeholder consultation process, as a limiting factor for developing all other aspects and practicalities of the European degree (label). Simply put, when considering the operational necessities, challenges, opportunities, and facilitating factors, stakeholders are limited by a lack of concrete understanding behind the purpose of the European degree (label). This is strengthened by a lack of understanding regarding which pathway – European degree or European degree (label), or both – the European policymakers plan to pursue.

The European degree and European degree (label) need to be defined while carefully distinguishing between the two terms, the intention behind their creation, and the expectations for their use. Importantly, this must also consider establishing the relationship between different European bodies and the European degree (label).

As such, discussion on revising the European degree (label) criteria should begin with the necessity to clearly present the underlying goals behind the label's creation, shown from the perspectives of different stakeholder groups, including considering the value to them and the reasoning behind the creation.



Defining the values driving the European degree (label)

Connected to the above point, an emerging topic during stakeholder consultations indicated uncertainty regarding the values that support the introduction and implementation of the European degree (label). On a philosophical level, this is connected to a much wider topic of what “Europe” and “European” mean as concepts grounded in centuries of historic contexts and backgrounds.

On a practical level, this signals that the European Commission, together with all relevant stakeholders, needs to ground efforts for the European degree (label) in defined political assumptions over what the label represents for countries. Notably, prominent questions become what exactly the European dimension means within the context of the European degree (label), and how to avoid the pitfalls of EU-centricity, dominance of Western-European-centric values and similar problematic notions related to sociopolitical value.

While there is currently no definitive answer, a common suggestion among stakeholders was to ensure inclusivity and a broad perspective when laying the core values of the European degree (label).

Another point was to ensure academic values are also intrinsic to how the European degree (label) will be defined. This will be connected to the value proposition (discussed further) but ensuring that academic freedom is valorised and integral to the European degree (label) will facilitate establishing it as a unique part of higher education in Europe.

This also concerns the practical considerations regarding communicating the European degree (label) to stakeholders. Clear messaging will be important for stakeholders across all stages of the European degree (label) development: Ministries, quality assurance agencies, higher education institutions, academic staff and students.

Differentiating the European degree (label) from other options for transnational collaboration in higher education

An often-raised question among stakeholders and university representatives referred to the need for a European degree (label) when other options for joint degree programmes already exist. The data collected through stakeholder consultations points towards a lack of clarity for different institutions (Ministries, quality assurance agencies) on what is the purpose of the European degree (label) when compared to alternatives for joint programme delivery and what does the European Commission wish to achieve through the introduction of the label.

The European degree (label) should indicate specific added value to students and other stakeholders that is focused on a transnational learning process that is clearly distinct from other models and platforms, such as joint degrees themselves, Erasmus Mundus programmes etc. Clear relationships (linkages, complementarity, differences) must be established between the label or the degree and similar instruments available in the EHEA. Importantly, this



highlights that stakeholders involved in higher education with the knowledge available to them could see overlaps between a European degree (label) and other instruments.

This further demonstrates the importance for the European degree (label) to have a clear identity where HEIs and students understand the benefits of programmes that have a European degree (label).

(Specific) Added value of the European degree (label) criteria

A commonly raised point during the input gathering concerned the added value aspect of a European degree (label) (which is also connected to a prior point on differentiating between the label and other transnational degree options). Broadly, the stakeholder's views are that the European degree (label) should be a framework that is applicable to different contexts and is discipline neutral. In other words, the value proposition of the degree (label) should not be grounded in specific types of programmes; rather, it should signal a quality and approach to higher education provision.

The collected feedback suggests that the stakeholders perceive the European degree (label) as focusing on internationalisation of the learning experience, the flexibility of learning experience, the European characteristic of the learning experience, and the inclusivity of the learning experience. Thus, the message being communicated to potential students (and by extension to graduates when they enter the labour market) should be based on intercultural experiences, international student communities, and innovative teaching methods delivered through student-centric learning process. Additionally, a suggestion was raised that the European degree (label) programmes could also include specific types of courses for students – European history, Europe and geopolitics, etc. – that would further strengthen the European dimension.

A potential issue is that for the stakeholders this ends up diluting the European degree (label) itself. As it takes on more characteristics, it starts losing its distinctness and applicability to diverse contexts, being about too many aspects at once without clearly demonstrating how it would be beneficial.

European degree (label) as a mark of quality

The European degree (label) has been discussed by quality assurance agencies as a potential tool to support the market visibility and position of European HEIs. The (label) should present unique transnational characteristics where programmes with the European degree (label) are characterised for their high quality (i.e., programmes that are evaluated by EQAR-registered quality assurance agencies).

At the same time, it is important to consider that the European degree (label) should not be used to create an elitist system which diminishes the value of other programmes. This further highlight how the European degree (label) needs defining characteristics which would set it apart from other higher education offerings without lessening their value.

European degree (label) as an indicator of international education experience



The joint programmes with a European degree (label) should have mobility as a core part of their design. Students enrolling in these programmes should have seamless access to the participating HEI services and their mobility an expected part of completing the degree.

The European degree (label) can become a clear indicator to employers of multicultural experience but only if mobility is made a deliberate and necessary part of the study experience.

Using European degree (label) to strengthen international visibility of European education

The European degree (label) can be considered a unifying mark of quality for a potential driver of international visibility of European higher education. It is a new opportunity to attract international students by offering a uniquely European approach grounded in internationalisation, mobility and education quality. This would strengthen the position of European HEIs on the international market.

Summary of recommendations:

- The European degree (label) should guarantee that the programme in question has a strong European dimension and adherence to European values. It is essential that this European dimension does not come at a cost of external and global cooperation that many European universities foster and cherish.
- The European degree (label) should not be a mark of excellence (as typically understood) of the programme content in question. However, it can demonstrate excellence in international cooperation and programme co-creation processes, which the degree or the label can signal.
- The imperative and expectation from the European degree (label) is that it leads to some qualitative enhancement of European joint education. It is not enough that the degree or label simply recognises the value of a certain type of existing programmes as they are, i.e. the degree or label should not serve primarily as a communication tool. However, if added value based on innovative qualitative characteristics is demonstrated, then an additional function of the degree or label can be that of a communication and visibility tool.

2. Scope of the European degree (label) and the European degree

Expanding the scope of the European degree (label)

A key topic when considering the European degree (label) is the level at which it would be applied. Stakeholder consultations and discussions with the three Alliances involved in the project (ECIUS, EPICUR and YUFE) highlight the imperative of having smaller units being eligible for the degree (label). This includes minor degrees, micro-credentials, flexible learning pathways and other similar models – in essence all the education opportunities and units of learning of a volume smaller than a full programme.



The benefits of this approach are the increased opportunities for the European degree (label) uptake as the eligibility would not be exclusively reserved for full degree programmes. Higher education institutions would have the freedom and flexibility to explore novel educational offering, grounded in the goals and value of the European degree (label). This is especially important in terms of future-proofing the European degree (label) concept – as it can be expected that full degrees will lose at least some of their uptake in relation to smaller, more flexible and agile units of learning which seamlessly fit in the framework of lifelong learning. Further support for this expansion comes from the fact that European University Alliances often work on innovative models which are not easy to structure within a full programme, as is the case with three alliances involved in the FOCI project.

However, it must be considered that regulations for smaller education units can be quite different between countries, necessitating a solution of how the European degree (label) would be regulated.

Focusing on learning flexibility and micro-credentials

The potential of micro-credentials as a differentiating factor for a European degree (label) was brought up by different stakeholder groups. Micro-credentials were viewed as a flexible tool that would not increase administrative burden for quality assurance agencies and other involved stakeholders, while the European degree (label) could be a driver in their uptake in the EHEA. Students and labour market representatives acknowledge the value of micro-credentials as an indicator of personalised, flexible and inclusive learning.

In the context of added value, micro-credentials are an opportunity for a European degree labelled programme to differentiate itself from other labels and approaches to joint programme implementation. Micro-credentials have the potential to fulfil interest in flexible learning pathways. Furthermore, this would facilitate the wider exposure of micro-credentials to higher education stakeholders and demonstrate their application and benefits.

Integration of informal and non-formal education within the European degree (label) scope

Throughout FOCI policy consultations, a question of integrating informal and non-formal education within the scope of European degree (label) was raised. While higher education institutions can in general recognise informal and non-formal learning, such principles are not universal across European countries. In line with contemporary approaches which break down the barriers between formal, non-formal and informal education by acknowledging that learners acquire and develop competences in a multitude of contexts, different transnational models of higher education should be sensitive to these considerations.

Therefore, it is very important that the European degree (label) concept, criteria and criteria application are not stifling the possibilities of HEIs in the domain of informal and non-formal learning. This goal was emphasised and supported by stakeholder consultations, during which it was noted that informal and non-formal education should not be an obstacle for a European degree (label), under the condition that it is within the legal framework.



European degree (label) and mobility within the education system

Studying programmes, micro programmes, courses, and other units under the European degree (label) should not create obstacles when choosing different learning paths or moving between different learning paths. Flexibility of higher education is a goal that needs to be supported and facilitated, which is why it is important that the application of a European degree (label) does not prevent learning mobility and the degree (label) needs to be in line with quality assurance and European guidelines.

Summary of recommendations:

- In the interest of future-proofing the European degree (label) initiative, it is imperative to also apply these principles to smaller units of learning, such as micro-credentials. This perspective should always be clearly communicated and emphasised externally.
- Focus on other models of HE provision is what brought the three Alliances together within the project, and the FOCI consortium is therefore committed to applying the European degree (label) principles on such models.
- The recent focus of the European Commission on European degrees instead of the label as an intermediary step should not come at the expense of this push for including units of learning that are smaller in volume than a full programme.
- Scope of the initiative should also be expanded to EQF level 5.

3. Fitness of the proposed European degree (label) criteria

Scope of the criteria requirement for the European degree (label)

For the European degree (label) it is worth considering the reduction of the number of different application criteria to foster a greater focus on specific characteristics in line with the goals and values of the degree (label). This could lead to two outcomes that would be beneficial to applying to higher education institutions. First, it would reduce the burden on HEIs in designing compliant programmes as well as the administrative burden on quality assurance agencies evaluating such programmes.

Secondly, by limiting the criteria the European degree (label) would have a stronger and more obvious focus that would be easier to communicate to students and the labour market. This goes back to the discussion about clear goals and value proposition. A reduction in the number of criteria could be an option to achieve clear messaging regarding the benefits and the type of learning pathways supported by programmes with a European degree (label).

It would be worth it to consider the possibility of aggregating or clustering the criteria and use of umbrella terms to avoid accidental exclusion of diverse models and options.



A clear indication of the criteria targets

Stakeholder consultations demonstrated that there is a degree of unclarity regarding the target of specific criteria – i.e. which criteria are applicable to the proposed programme, and which need to be met by collaborating institutions. This indicates that the aims and substance of criteria can be misunderstood by those applying the criteria in practice, which points to a need to develop clear methodology and guidelines for the application of European degree (label) criteria.

Removing ambiguity from criteria description would greatly support the efficiency of the evaluation process. For example, “high skill” could mean different levels of competences within different fields and disciplines. Consider the context within which the criteria might be applied and link them with existing competence frameworks.

Considering how international mobility is reflected in the evaluation criteria

International mobility was debated during stakeholder consultations as it is an important aspect of the European degree (label). Generally, stakeholders agree that international mobility is difficult to replicate through other internationalisation approaches, such as virtual mobility, but on the other hand strong emphasis on physical mobility risks damaging the inclusivity of the programme in question. Thus, the question is whether inclusion of international physical mobility creates opportunities or barriers for students.

Specifically, while having international physical mobility as a core part of the European degree (label) would support internationalisation of students, intercultural communication, create concrete added value, it might also create barriers for students who are unable to engage in mobility due to different circumstances.

A more flexible approach in formulating the mobility-related criteria may solve the issue by acknowledging that for some students, who would otherwise engage with European degree (label) studies, international mobility may not be an option, even if attempts would be made to remove obstacles.

Academic autonomy

This subject has been brought up by different stakeholders who considered that the European degree (label) should not come at the expense of academic autonomy. It is both a question of perception towards the European degree (label) which is solved through transparency regarding its purpose and role in EHEA. As mentioned previously, the European degree (label) should not devalue diverse approaches to curriculum content and design; otherwise, it risks alienating HEIs from its adoption.

Leveraging existing tools and frameworks

Examining the reflections of proposed mandatory criteria, one of the main takeaways is the support towards options grounded in already established processes for transnational



collaboration in higher education. The proposition to utilise European Standards and Guidelines (ESG) for internal and external quality assurance, use of ECTS for joint programmes, accreditation and evaluation to be carried out by EQAR-registered agencies and similar were rated with near universal approval.

Based on the stakeholder consultations, at the same time, propositions that risk barriers due to incompatible national higher education framework conditions (i.e., joint policies for admission, selection, supervision, monitoring, assessment and recognition procedures for joint study programmes) were met with greater scepticism, particularly from quality assurance agencies.

The challenge from their point of view is available capacity to work on new requirements for transnational cooperation (in terms of available funding and personnel to devote time to such activities). Thus, building on the earlier point of reduced administrative burden, actions to introduce the European degree (label) should leverage existing frameworks – EA, ECTS, ESG, EQF, EQAR – while avoiding introducing adoption criteria that would require added collaborative work on the part of actors in the national higher education ecosystems (i.e., national quality assurance agencies).

Furthermore, the findings from a recent analysis by PPMI on behalf of DG EAC4 showcases that even in the context of available instruments, their uptake across EHEA must be considered (e.g., the EA is not available or only partially available in some countries). With this in mind, EQAR and EQAR-registered agencies were determined to be the most flexible option with a high approval from HEIs regarding their involvement in awarding the European degree (label).

Responsibility for evaluating applicants for European degree (label) and streamlining the process

The FOCI consultation process found a significant level of uncertainty among stakeholders and partner universities about the evaluation methodology and process for granting a European degree (label). The collected feedback from those who piloted the evaluation process suggested that considerable workload is required, both on the side of evaluated programmes and on the side of evaluators. Several suggestions were made on how this process could be streamlined.

Most importantly, conducting an evaluation on a “cross-institutional” level would enable stable partnerships (groups of HEIs) to award a European degree (label) for all their educational programmes. In this way, the need to evaluate each specific programme would be avoided, thereby simplifying the system and focusing on stable cooperation structures instead of individual programmes. This is especially important in light of recommendation to apply the European degree (label) methodology to smaller units of learning.

⁴ DG EAC (2023). The road towards a possible joint European degree: identifying opportunities and investigating the impact and feasibility of different approaches. Available at: <https://op.europa.eu/en/publication-detail/-/publication/2844365b-649f-11ed-92ed-01aa75ed71a1>



Another consideration is to incorporate the evaluation into existing processes, i.e., European quality assurance for higher education (EQAR), Standards and Guidelines (for Quality Assurance in the EHEA ESG).

Lastly, it would be desirable to leverage quality assurance agencies that already have a lot of experience with evaluations and combining procedures. By involving such quality assurance agencies, it could support reducing the administrative burden on higher education institutions when applying for European degree (label).

Summary of recommendations:

- Structural elements of the criteria (number of HEI involved, use of ECTS, joint degree delivery, ESG-based quality assurance) are appropriate for the purpose of the European degree (label), though it should be noted that these structural dimensions are already present in the European Approach for Quality Assurance of Joint Programmes and in the Bologna process tools.
- European degree (label) criteria, as currently formulated, require significant investment of time and effort. Therefore, it is essential that a clear and reliable evaluation methodology is developed, together with a simple and lean evaluation process (potentially integrating this evaluation within other processes).
- FOCI proposal for revising the European degree (label) criteria is provided as an annex to this document (Annex 1).

4. Legal frameworks and their impact on the European degree (label) concept

Compatibility with national legislation

The current legal framework at national, regional and institutional level plays an important role in shaping and regulating the implementation of the idea of the European higher education degree (label). The Bologna Process, which began more than 20 years ago, brought together 49⁵ member states of the European Higher Education Area (EHEA) to establish similar higher education systems and instruments. The aim was to improve mobility, employability, equal access, and Europe's global competitiveness. However, the degree of implementation of the Bologna Process varies between participating governments. A harmonised European framework which would enable more intense transnational collaboration across different legislations could be an important added value of the European degree (label).

The FOCI project identified different definitions and terms ("joint degree", "diploma" and "joint programme") in the legislation of EU Member States. It is suggested that all policy debates on

⁵ Russian Federation and Belarus have had their right of representation suspended on 11-12 April 2022



the European degree (label) use a standardised nomenclature to increase the accuracy and understanding of the ideas addressed by the policy. When it comes to joint degrees, there are various legal and administrative difficulties that prevent them from being awarded. It is also worth noting that not every Member State or higher education institution can award a combined degree at all levels of higher education. The development of joint degree programmes in international cooperation is further complicated by the different levels of regulation in the EU Member States - from national or regional to institutional and specific levels.

Compliance with national regulations is crucial for the successful implementation of the idea of the European degree (label). Although the current form of criteria may not be sufficient to remove all legal obstacles to the creation of common (European) joint degrees, the European degree (label) can be a first step towards finding common ground and building trust between Member States. This observation is linked to a further recommendation to clarify the objectives of the European degree (label) initiative: are the criteria primarily aimed at reflecting policy within European higher education and highlighting the European ethos and values, or do they also act as a mechanism for labelling excellence and/or overcoming obstacles to the introduction of joint degrees? A thorough understanding of the purpose and added value of the European degree (label) is required in order to implement the necessary changes to the legal framework at both national and institutional level.

The European quality label for degrees could help to implement the European approach to quality assurance of joint degree programmes and promote recognition of qualifications based on a transnational learning experience and foster trust between all stakeholders. In addition to quality assurance and accreditation issues, all Member States must ensure consistent compliance with the standards for awarding the European degree (label).

Compatible rules are essential to maintain the prestige and importance of the European degree mark, increasing confidence and recognition both domestically and internationally. With the ever-expanding regulatory framework, ongoing discussions and co-operation between Member States are crucial to ensure the strength and relevance of European degree (label) in the ever-changing higher education landscape.

Legal and administrative feasibility of issuing European degree (label)

The fundamental long-term idea behind the European degree (label) is to establish a new type of qualification or a credential which would serve as a voluntary system that institutions can use to demonstrate the quality and alignment of their degrees and programmes with European standards of international cooperation. Following in-depth analysis and stakeholder input, three distinct outcomes have been outlined, each with varying degrees of legal feasibility and administrative complexity. It is important to take into account that the legal feasibility of the presented outcomes is contingent upon the existing national legislation's adaptability to accommodate the proposed European degree (label) concept. Each outcome is ranked based on its potential feasibility within the current legal frameworks.



Ranking the legal feasibility	Implementation potential and required changes
<p>1. The awarding of a European degree label to a joint programme that meets the common European criteria. It may be issued in two ways:</p> <p>1.1. <u>A European degree label in a separate certificate:</u> Providing students with a separate certificate displaying the European degree label alongside their diplomas is considered the most legally feasible option. This aligns with the current practice of issuing diploma supplements. However, gaining national recognition may prove challenging without collaborating with national authorities to achieve mutual acceptance. As well, this is the least supported option.</p> <p>1.2. <u>European degree (label) as a label in the Diploma Supplement, as a recognised qualification (long-term option):</u> Including the European degree label directly in the diploma supplement is perceived as a best backup option. A detailed analysis of national and institutional regulations is required to determine how the label can be incorporated into the supplement. Strategic engagement and advocacy for flexibility around document content may help enable this approach.</p>	<p>These outcomes can be relatively easily implemented within current legal frameworks, or with some modifications as they mostly align with existing practices of issuing supplementary documents and can be incorporated without significant legislative changes.</p>
<p>2. <u>Accredited Joint Degree Based on Common European Criteria:</u> This option, while feasible, involves a level of complexity due to the additional layer of accreditation. Accreditation as an additional quality label could enhance the value of the European degree (label) but requires cooperation with accreditation bodies and potential adjustments to existing processes. Also, there are differences in opinion about this option's desirability – while some participants recognised its value, others believed that this option requires regulatory changes while bringing little added value.</p>	<p>Implementation may require adjustments to accommodate the additional accreditation process. Collaborative efforts with accreditation bodies would be essential, and potential modifications to accreditation regulations may be necessary.</p>
<p>3. <u>European degree:</u> Accrediting a European degree programme universally recognised across the EU (according to the National Qualifications Frameworks of all Member States) involves the highest level of complexity and is the most desirable format of European degree. Alignment with national qualification frameworks requires significant legal coordination and potential changes in the legal system to establish a standardised and universally accepted framework. This</p>	<p>This necessitates significant changes to the legal framework. Harmonising with National Qualifications Frameworks requires comprehensive legal coordination and potentially introducing new legislation to establish a standardised European degree. Changes in the regulatory frameworks can only happen if the</p>



would be the best possible, yet the most challenging and time-consuming option.	added value is clear and the necessity of a European degree is clearly demonstrated.
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While the outlined outcomes encompass a range of different options and possibilities, a potential oversight is a phased implementation approach, gradually integrating the European degree (label) concept through less complex options first to pragmatically allow for smoother adaptation within current legal frameworks.

Distinguishing the European degree (label) within the Bologna framework

The format and issuance process of the European degree (label) necessitates careful consideration, balancing the facilitation of the Bologna process and the provision of added value for students. Embedding the European degree within existing Bologna tools appears pragmatic, leveraging established frameworks. The main focus should remain on implementing existing instruments and finding the best possible way to use them, including the Bologna Process, the Lisbon Recognition Convention, and the European approach to quality assurance for joint programmes. Identification is defined by three-cycle structure (bachelor's, master's, and doctoral degrees) fosters standardisation and comparability. The European Credit Transfer and Accumulation System (ECTS) enhances transparency in credit recognition, while the emphasis on student-centred learning and interdisciplinary approaches adds uniqueness. From this perspective, the European degree (label) identity is distinguished by a unified framework that facilitates international mobility and a commitment to a holistic educational experience, distinguishing it from other academic programmes globally.

The European degree (label) and digital obstacles to the issuing process

Digitally issuing the European degree (label) requires clear procedural requirements to be set. The process should align with contemporary standards, ensuring accessibility and interoperability. Obstacles may include varying digital infrastructure across countries, potential resistance to digitalisation, and concerns about data security. Overcoming these obstacles necessitates collaborative efforts, emphasising digital literacy, and addressing infrastructure disparities.

Creating a clear visual identity for the European degree (label)

Visual identity is crucial for recognisability. Establishing a unifying visual identity requires collaboration between a majority of the stakeholders, ensuring consistency while accommodating cultural diversity. Theoretical considerations involve incorporating principles of design psychology to create a visually distinct and universally recognisable label. Striking a balance between standardisation and cultural sensitivity is imperative to enhance the visual impact and global recognition of the European degree (label). Also, standardising the terminology will likewise be important to ensure smooth implementation.



Summary of recommendations:

- The European degree (i.e. a recognised qualification across EU) is recognised as the most desirable format for the future European degree (label). It is also recognised that significant changes in the regulatory frameworks would be necessary for that format to be implemented, which also leads back to questions discussed under Section 1 (Purpose and added value) - such revisions of regulatory frameworks can only happen if the added value is clear, and necessity of the European degree is clearly demonstrated.
- With the European degree as a qualification recognised across EU as the number one, but long-term option, issuing the European degree (label) within the diploma supplement of joint degrees is perceived as the best backup option. This would be possible in most of the regulatory contexts already, although in some countries that option would also require some modifications of regulatory frameworks.
- An accredited joint degree based on the European degree (label) criteria, i.e. recognised quality label is also supported as an option, although there are differences in opinion about this option's desirability – while some participants recognised its value, others believed that this option requires regulatory changes while bringing little added value.
- Issuing separate certificates to students, next to diploma documents, is the least supported option, although at least some participants recognised the value of this option and all participants agreed that it is legally feasible.
- It would be useful to explore the link with the outcomes of the Legal status pilot projects and how they plan to tackle the legal barriers.

5. Policy framework for the European degree (label)

Minimising administrative burden of national agencies

An important aim of the European degree (label) concept is to increase transparency in higher education throughout Europe. Quality assurance agencies consulted within the FOCI project are generally in favour of launching a European degree (label). However, it is crucial that the implementation of the European degree (label) does not further burden the agencies in their administrative processes (The Bologna process in European education⁶, 2009). Quality assurance agencies advocate greater flexibility in terms of the criteria as a method of decreasing administrative requirements for those involved in assessing applicant programmes for a European degree (label). Criteria should be flexible and allow for variations across national contexts. Establishing a clear communication channel between the European Commission (EC) and national authorities will be crucial. The EC should play a facilitating role in coordinating with

⁶ <https://dl.acm.org/doi/10.1145/1595496.1562883>



national agencies to ensure that the European degree (label) complements existing structures and processes.

Coordinating body on the EU level to oversee implementation

In line with the findings of the PPMI study, the establishment of a higher-level coordinating body on the EU level is recommended. This body should consist of a committee of experts representing different stakeholders (students, staff, external stakeholders etc.) and European organisations (HEI organisations, QA agencies, EC, EQAR etc.). This committee would oversee the implementation of the European degree (label), ensuring transparency, fairness and common approach in implementing such a novel concept. The flexible composition of the committee would minimise the administrative impact on overall quality assurance agencies and stakeholders.

Providing clear guidelines to HEIs on the application process

To encourage interest and participation in the European degree (label), clear and transparent guidelines for the submission process should be developed. These guidelines should elucidate the reasons behind the chosen criteria, linking them to policy goals and promoting process transparency. The guidelines should form a comprehensive package together with evaluation methodology and guidelines referred to above. Collaboration between the coordinating body, national agencies, and HEIs is crucial for creating guidelines that facilitate a smooth application process while ensuring alignment with national and European objectives.

Introducing intermediary steps to awarding process

To ease the adoption of the European degree (label), it would be useful to introduce introducing intermediary steps (i.e. when majority of mandatory criteria are met) with an enhancement focus, to aid programmes and institutions in meeting these criteria. This approach would allow programmes that meet certain conditions to be recognised for their suitability for the European degree (label), offering flexibility for adjustments in subsequent evaluations and emphasising the enhancement dimension. Careful communication and collaboration with stakeholders will be essential to ensure that intermediary steps contribute to the label's credibility without creating unnecessary administrative hurdles.

Pathways for policymakers to engage in the development of the European degree (label)

To harness the interest of Ministries and policymakers, the development process of the European degree (label) should incorporate opportunities for active engagement. Establishing collaborative platforms involving European higher education ministries, the EC, and quality assurance agencies, higher education institutions and students can facilitate meaningful discussions and open new opportunities. Policymakers should actively participate in shaping the label, aligning it with existing and ever-changing policy goals, and ensuring that the European degree (label) contributes to broader European priorities.



The establishment of a European degree and national policy goals

The analysis of data obtained through stakeholders' consultations reveal Ministries' interest in supporting European degree (label) criteria that can be linked to existing policy aims. Cross-sectoral criteria (digital skills, environment, democratic values, increasing the visibility of collaborative projects) were frequently supported by Ministry representatives. Importantly, fulfilling the goals of the Bologna process was one of the primary policies aims associated with the European degree (label)ing. This emphasises the expected extra value for policymakers as a tool for accomplishing policy objectives.

This is analogous to the situation with quality assurance agencies and the reduction in administrative burden. Larger support for the European degree (label) can be achieved if the label is clearly associated with existing policy goals and priorities. For example, these can be linked to cross-cutting EU priorities that are common goals; thus, would be known in advance in the development of the European degree (label). However, caution should be taken in not making this aspect the main priority of the European degree (label).

European degree (label) compatibility with national higher education policies

A successful adoption of the European degree (label) requires addressing potential pushback from Member States if the label is viewed as threatening the independence of their national higher education systems. Rather than imposing national characteristics or increasing administrative burdens, the label is to support transnational cooperation and new pathways in higher education. Clear communication is needed to demonstrate how the European degree (label) complements existing structures and does not diminish the legislative power of national authorities. To award the European degree (label), alliances should be encouraged without compromising the participation of other institutions. The label will be accepted and integrated into the diverse European higher education landscape through this approach.

Summary of recommendations:

- When it comes to simplification and minimising additional burden for all actors, digitalisation of all stages of the process is recognised as a key support factor. This also includes digitalising diplomas as documents.
- Standardising the terminology will likewise be important to ensure smooth implementation.
- Alignment with currently existing national and international processes, structures and tools will be crucial in ensuring that there is no undue burden resulting from this new initiative and that there are no overlaps, redundancies and duplication. Strong communication and interlinks with other relevant European-level bodies and the Bologna Process will be important.
- Until a legal framework for European Universities Alliances is developed (if so decided), universities should be awarding bodies for the European degree (label). However, other



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bodies can already issue certificates for other units of learning, which might be compatible with the European degree (label) criteria.

- One crucial point of alignment is that no element is externally evaluated twice, e.g. if the programme uses European Approach for Quality Assurance of Joint Programmes, then there shouldn't be additional national-level quality assurance requirements, nor should the European (degree) label evaluations check for these same elements.
- For this purpose, cross-institutional external evaluation should be developed, ensuring that a group of universities can continuously award the European degree (label) for all their educational offers.
- In order to receive the right to award the European degree (label), cooperation structures in charge of developing and delivering programmes leading to the European degree (label) would need to undergo external quality evaluation. This should be done by existing QA agencies and not via creating a new entity for this purpose. An option would be to include multiple agencies in the process to guarantee an international dimension.



5. Overall conclusions

Several **key success factors** have been identified as essential to the European degree (label) initiative's objective of fostering a high quality, widely recognised European higher education system. These factors ensure that the initiative is well positioned to adapt to and influence the evolving educational landscape in Europe.

Stakeholder engagement: The initiative has been successful in engaging a wide range of stakeholders, including government ministries, student associations, quality assurance agencies and labour market representatives. This strong stakeholder involvement was crucial in conducting a thorough needs analysis and developing the European degree (label) criteria.

Cooperation between the alliances: Collaboration between different European higher education alliances (YUFE, ECIU and EPICUR) has enabled an extensive network of experts and a wide range of perspectives. This co-operation between the alliances has been instrumental in disseminating the initiative and linking it to other relevant developments.

Alignment with existing policies and frameworks: The initiative has taken care to align the European degree (label) with existing policy objectives, priorities and frameworks such as the Bologna Process, the Lisbon Recognition Convention and the European approach to quality assurance for joint degree programmes. This alignment ensures that the European degree (label) complements and does not conflict with existing systems.

Flexibility and adaptability: The initiative has recognised the importance of flexibility in the European degree (label) criteria to accommodate different educational models and allow for the inclusion of flexible learning pathways and micro-credentials.

Clear communication: Efforts have been made to clearly communicate the purpose and role of the European degree (label) within the European Higher Education Area (EHEA) and to ensure that it is not perceived as interfering with national higher education policy or academic autonomy.

Utilisation of established instruments: The initiative has succeeded in utilising existing instruments and frameworks such as the European Standards and Guidelines (ESG) for quality assurance, the European Credit Transfer and Accumulation System (ECTS) and the European Qualifications Framework (EQF) to support the implementation of the European degree (label)

Compatibility of the legal framework: The initiative has taken into account the diversity of legal frameworks in individual Member States and aims to create a single reference framework for qualifications that would promote the transferability and recognition of qualifications across Europe.

Planning for sustainability: The development of a sustainability plan (Deliverable 5.2) ensures that the project results have a lasting impact and continue to influence policy at European level.

These success factors are crucial for the ongoing development and future implementation of the European degree (label) initiative, which aims to improve the quality and recognition of higher education in Europe.

The FOCI project has identified several **areas that require further attention** to ensure the successful implementation of the European degree (label). These include clarifying the criteria



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and their objectives to avoid confusion among applicants, considering the role of international mobility in the European degree (label) and ensuring that the initiative does not compromise academic autonomy. The use of existing tools and frameworks such as the ESG and ECTS is favoured, but there is caution against introducing new requirements that could conflict with national frameworks for higher education.

The digital edition of the European degree (label) requires clear standards to ensure accessibility and interoperability, taking into account the different digital infrastructures in each country. In addition, the creation of a clear visual identity for the European degree (label) is essential for its recognisability and global recognition.

The FOCI project emphasises the importance of aligning the European degree (label) with national policy objectives and ensuring that it is not seen as interfering with national higher education policy. The project's sustainability plan aims to ensure that the results have a lasting impact and continue to influence European policy.

The **sustainability plan** (Deliverable 5.2) describes the strategies to ensure that the project results have a lasting impact and continue to influence policy at European level. The plan emphasises building on the contacts, capacities and initiatives developed during the project and uses both internal and external capacities to coordinate with future policy initiatives of the European Commission. The FOCI consortium also recognises the added value of inter-Alliance collaboration which provides an extensive network of experts. This network will be instrumental in further disseminating the initiative and linking it to other relevant current developments, such as the Bologna Process. FOCI has created a comprehensive framework to ensure that the results and recommendations of the project have a lasting impact on the development of the European degree (label), with the ultimate goal of enhancing the European higher education ecosystem.



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Future-proof Criteria for Innovative European Education

Annex 1

**FOCI comments on the final
version of the European degree
(label) criteria proposed by the
European Commission**

Annex 1: FOCI comments on the final version of the European degree (label) criteria

1. Introduction

First version of the criteria was provided and published before the pilot projects started. All the pilot projects endeavoured to test and validate these criteria. In January 2024, the European Commission published the first draft revision of these criteria and initiated targeted consultations with the pilot projects. After one further subsequent revision in February 2024 and accompanying *ad hoc* meetings organised for this purpose, the pilot projects delivered their final input. The content below represents FOCI consortium suggestions and supporting arguments for this final input on the last version of the draft European degree (label) criteria. Due to time constraints and intense revision process, this input to the European Commission did not undergo in-depth consultations within the Consortium and with interested stakeholders, as was the case with other FOCI output. However, the tentative proposal below was based on the developed FOCI policy positions and recommendations presented in this document.

2. FOCI proposal

European Degree (label) criteria			EQF Levels	Alternative proposal for smaller units of learning	FOCI comments and proposals
Transnational programme organisation and management	Higher education institutions involved	The joint programme is offered by at least 2 higher education institutions from at least 2 different EU Member States.	6, 7, 8	Applicable in the current formulation.	No additional comments.
	Transnational joint degree delivery	The joint programme is jointly designed and jointly delivered by all the higher education institutions involved.	6, 7, 8	Applicable in the current formulation.	In the guidelines, it should be clearly explained that the expression “jointly designed and jointly delivered” does not entail a uniform educational provision being delivered at different locations, but that there can be significant diversity between partner universities.
		The joint programme leads to the award of a joint degree.	6, 7, 8	<i>The joint programme leads to the award of a joint certificate or</i>	No additional comments.



				another effective form of recognition.	
		A joint diploma supplement is issued to students, providing a comprehensive list of the outcomes that students attain throughout the programme.	6, 7	For micro-credentials: “The certificate awarded contains information on all elements listed in the European approach for micro-credentials (European standard elements to describe a micro-credential)”	Through the guidelines, it should be ensured that the diploma supplement not only covers activities expressed in ECTS point but also any form of students’ engagement and achievements.
		The joint programme describes the learning outcomes and credits in line with the ECTS Users Guide.	6, 7	Applicable in the current formulation.	It might be useful to include a specific reference to seamless grade conversion, like for example Egracons grades conversion tool.
	Joint arrangements for the joint programme	The joint programme has joint structures and/or mechanisms to establish and monitor joint policies and procedures describing the curriculum as well as organisational and administrative matters in accordance to national/regional legislation of all partners. Students’ representatives are part of the decision-making process to define the joint policies and procedures.	6, 7, 8	Although for much smaller units, students are not always directly engaged, this criterion could still be applicable for such models as well if involvement on an institutional or consortium level is used to feed into the programme in question.	This criterion is now too extensive and convoluted. Proposal to simplify in the following way: “The higher education institutions involved have established and formalised joint policies, procedures and/or arrangements dealing with curriculum planning and delivery, as well as all organisational and administrative matters. Democratically elected students’ representatives are part of the decision-making process to define the joint policies, procedures and/or arrangements”. This way, multi-level descriptions (e.g. structures and/or mechanism to establish and monitor joint policies and procedures) are avoided and description goes straight to the expected outcome.

	Quality assurance arrangements	Internal and external Quality Assurance is conducted in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The institutions, the study field or the programme are evaluated by an EQAR registered agency.	6, 7, 8	Applicable in the current formulation.	No additional comments.
		The joint programme is evaluated using the standards of European approach for quality assurance of joint programmes (EA).	6, 7, 8	Applicable in the current formulation, with a small revision: “The joint programme is compliant with the standards of European approach for quality assurance of joint programmes (EA), insofar as these standards are applicable to the model in question”.	No additional comments.
	Graduate tracking	The joint programme monitors graduates through a graduate tracking system.	6, 7, 8	Not applicable for smaller units of learning but could be removed for such instances.	Within the FOCI pilot evaluation, almost all programmes demonstrated having a certain type of a tracking system but very few use the EUROGRADUATE framework. Therefore, more open statement in the current version is welcome.
Learning experience	Student-centred learning	The joint programme is delivered in a way that encourages students to take an active role in the learning process, and the assessment of students reflects this approach.	6, 7, 8	Applicable in the current formulation and proposed revision.	Proposed revision: “The joint programme is designed and continuously enhanced through co-creation with students, and delivered in a way which stimulates learner autonomy and active role in the learning process. Assessment of students reflects this approach”. Since SCL is always difficult to evaluate, there is a need to use guidelines for further



					specification and providing examples of good practices in student-centred learning (or teaching, learning and assessment) and maybe refer to different EQF levels.
Flexibility of the programme	The joint programme offers the opportunity to receive and combine micro-credentials.	6,7	For micro-credentials: <i>“The programme adheres to the European principles for the design and issuance of micro-credentials as defined in the European approach for micro-credentials”</i>		
Interdisciplinarity	The joint programme includes embedded interdisciplinarity components.	6, 7, 8	Applicable in the current formulation.		No additional comments.
Labour market relevance	The joint programme aligns with labour market requirements by incorporating intersectoral components or activities and the development of transversal skills.	6, 7, 8	Applicable in the current formulation		Guidelines should specify whether it is expected that the labour market needs are analysed by consulting and engaging relevant stakeholders, and eventually using an inclusive list: business, public sector, NGOs...
Digital skills	The joint programme includes components and actions related to the development of advanced digital skills of students, all tailored to the capacities and circumstances of the joint programme, ensuring alignment with its scope and scholarly focus.	6, 7, 8			Should every programme include components on advanced digital skills? These competences can be acquired in different way outside the scope of the programme, therefore this criterion is a good candidate for removal from the list. If such elements are anyway to be used, then we need to consider expanding them to digital competences of the staff involved and referencing one of the existing frameworks (e.g. DigComp)



	Transnational campus – access to services	The programme has joint policies for students and staff to have access to services in all participating HEIs in equivalent conditions as all enrolled students.	6, 7, 8	Applicable in the current formulation and (especially) the proposed revision.	<p>In line with the discussion at the consultation meeting, we propose to add “relevant” to “services”. The criterion would then state:</p> <p>“The programme has joint policies for students and staff to have access to <u>relevant</u> services in all participating HEIs in equivalent conditions as all enrolled students.”</p> <p>This criterion especially needs to be accompanied by proper methodology/guidelines, as there is a large range of services we are talking about (IT, guidance, career development plan, accommodation, and so on)</p>
	Flexible and embedded student mobility	The joint programme offers deep intercultural experience, including a minimum of 1 period of student physical mobility (that can be split in several stays) at another or several partner institution(s) representing overall at least 60 ECTS at EQF 6 level and 30 ECTS at EQF 7 level. The joint programme has a policy offering alternatives for students who are unable to travel.	6, 7	“The joint education includes physical or virtual mobility in the volume of at least X% of the total ECTS volume of the programme”	For smaller units of learning, the requirement of physical mobility likely needs to be removed. We propose returning to a formulation similar to the one in the previous version. Percentage here is included just as a placeholder, it needs to be discussed which threshold is appropriate.
		The joint programme offers deep intercultural experience, including a total of at least 6 months of physical mobility at another or several partner institution(s).	8	Not applicable (EQF level 8)	No additional comments.

		The joint programme has a policy offering alternatives for students who are unable to travel.			
	Co-evaluation and co-supervision for dissertations	Dissertations are supervised by at least two supervisors and co-evaluated by co-supervisors or a committee with members from at least 2 different institutions located in 2 different countries.	8	Not applicable (EQF level 8)	No additional comments.
European Values	Democratic values	The joint programme's joint policies promote and adhere to democratic values.	6, 7, 8	Applicable in the current formulation, if the methodology and guidelines are sufficiently flexible to allow for very small units of learning to fit into such a standard.	This criterion could be very difficult to evaluate (also demonstrated within the FOCI pilot evaluation when applying optional criterion 8). This is a typical example of a criterion that can be evaluated at the institutional level, but likely not on the programme level. Proposal: <i>“Higher education institutions offering the joint programme promote and adhere to democratic values and academic freedom”</i>
	Multilingualism	During the joint programme, each student is exposed to at least 2 different EU official languages.	6, 7, 8	Applicable in the current formulation	Proposal: use a wider set of languages than just EU official languages. Options are using EHEA for the scope (to still keep it somewhat limited to Europe) or removing this limitation all together.
	Inclusiveness	The joint programme commits to wide participation by fostering diversity, equity and inclusion by adopting tailored measures to support students and staff with less opportunities.	6, 7, 8	Applicable in the current formulation and (especially) the proposed revision.	Proposed revision: <i>“Higher education institutions offering the joint programme commit to wide participation in the programme by fostering diversity, equity and inclusion by adopting tailored measures to support underrepresented, disadvantaged and/or vulnerable students and staff.”</i>



					This is again to effectively target the distinction between the programme level and institutional level.
		The joint programme commits to respect the principles of the European Charter for Researchers and Code of Conduct for the Recruitment of Researchers.	8	Not applicable (EQF level 8)	No additional comments.
	Green transition	The joint programme agrees on policies and actions related to environmental sustainability and implements measures to minimise the environmental footprint of its activities.	6,7	Applicable with proposed revision.	<p>This was one of the criteria more difficult to meet in the FOCI pilot evaluation because this kind of action is conducted by the participating HEIs rather than the programme itself. This criterion should either be reformulated to refer to the institutional level or be removed – is it really necessary that each programme separately has such policies and actions?</p> <p>Proposed revision:</p> <p><i>“Higher education institutions offering the joint programme have defined policies and actions related to environmental sustainability and provide students with the opportunities to develop competences related to environmental sustainability.”</i></p>
		The joint programme commits to the principles of the MSCA Green Charter	8	Not applicable (EQF level 8)	No additional comments.
[additional criterion proposed]	[additional criterion proposed]	Teaching staff contributing to the delivery of the joint programme has a level of intercultural competences required to teach in an international and intercultural setting.	6,7,8	Applicable in the current formulation.	No additional comments.

General feedback:

- This simplified version implies the need to develop clear guidelines and a robust evaluation methodology. FOCI has developed an internal methodology based on indicators, which could be easily adapted to the new version of the framework, and we would be happy to contribute to the ensuing discussion about the guidelines and evaluation methodology.
- Some of the criteria can be evaluated on a binary (yes/no) scale, while others are more suitable for a more elaborate scale. It is an imperative to clearly define evaluation scales in the methodology that will follow.
- Many of the proposed criteria can likely already be applied to smaller units of learning, which we consider encouraging. FOCI pilot evaluation found that the results were not so different between the two types of programmes.