

Erasmus for All

The position of CESAER

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CESAER - the Conference of European Schools for Advanced Engineering Education and Research - is a non-profit-making international association of leading European universities of technology and engineering schools/faculties at comprehensive universities and university colleges.

CESAER stands for scientific excellence in engineering education and research, and the promotion of innovation through close cooperation with the private and the public sector in order to ensure the application of cutting-edge knowledge in industry and society. It maintains and promotes the highest quality standards in knowledge and competence with added value to collaborators of competitiveness and growth environments.

CESAER has a current membership of 57 institutions from 25 different countries.

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1. Introduction

CESAER welcomes the Proposal for a Regulation of the European Parliament and of the Council establishing ERASMUS FOR ALL¹ and the proposed design and content of the new programme. CESAER member institutions have actively participated in the previous programmes and, therefore, can evaluate advantages and disadvantages for its implementation. We consider "Erasmus for All" as positive, for the higher education sector the proposal offers many opportunities. However the effectiveness will depend on the further elaboration of the proposal. Therefore it is early to give a proper comprehensive judgment, but some thoughts and concerns are worth sharing at this stage. All our comments are made from the university perspective with special regard to advanced schools of engineering education and research.

Erasmus for All will merge into one single programme all the present EU initiatives in education, training and youth sport activities, thus substituting existing programmes.

By creating one single programme, the existence of numerous programme titles with similar or overlapping objectives can be avoided and it may capitalize all the popularity and credit of the ERASMUS "brand" that is strongly associated to learning abroad and European cooperation.

The idea of creating one single program which merges previous ones (Lifelong Learning Programme - LLP, Youth in Action and Erasmus Mundus and others) comes from the previous positive experience in merging Socrates, Leonardo and eLearning into the LLP. According to the European Commission it will favour the creation of synergies through their key actions and it will maintain its quality. Participants will make the most of the experience by keeping the positive aspects of the previous programme and changing what has not worked well.

CESAER welcomes the intention of the Commission to make Erasmus for All more visible, less fragmented, easier and more flexible to implement and more quality focused.

CESAER sees it as essential that the programme adapts itself to the changing needs of society and evolves accordingly. Therefore, CESAER welcomes that the Commission considers a priority to maintain and strengthen the relationship between higher education institutions and the entrepreneurial world, and keeps excellence in teaching and learning, employability and entrepreneurship high on the agenda².

CESAER appreciates that this new programme shows a very strong commitment for the internationalisation of higher education worldwide, aiming at having strong impact at individual, institutional and political levels.

CESAER members expect that the new programme will focus on European Added Value (EAV) and systemic impact by supporting three types of actions:

- Learning opportunities inside or outside EU, namely studies and training, teaching ad professional development and activities for youth;

¹ COM (2011) 788 final).

² Op. cit., Page 4

- Institutional co-operation between higher education institutions, youth organizations, enterprises, local authorities and NGO's to stimulate innovative practices in education, and training for young qualified professionals, thus promoting employability creativity and entrepreneurship;
- Supporting member states' efforts to introduce reforms in order to modernize their educational and training systems and to promote innovation, entrepreneurship and employability,

reducing the current programmes into actually three integrated key actions, of which only one will include students, teaching staff, and technical staff mobility. CESAER sees the need to ensure that all tracks of mobility are included in a balanced way and are given the effective relevance, based on the previous positive experiences. For example, the mobility based on specific projects as the institutional cooperation between companies and higher education institutions aiming at good practice implementation into the modernization of educational systems. Regarding mobility of other staff, CESAER sees this line as important but many member institutions didn't use it because of limited financial means and high administrative costs.

For the higher education sector it is utterly important that simplification also means that the education programmes become more tuned with the proposed future research programme "Horizon 2020".

Summing up, CESAER assesses the major changes in the programme structure positively and is especially hopeful concerning further elaborations on the proposed higher budget as well as the envisaged simplification. However no detailed information is available yet on many important aspects, such as the conditions and other aspects of implementation. Therefore, we look forward not only to receiving more detailed information in due time during the preparatory phase towards 2014 but also to being involved as stakeholders in the discussions on the rules for participation. We will certainly comment further information as it will become available.

2. Branding

CESAER generally welcomes the programme name "Erasmus for All", but expresses concern about what the effects of loosing a well-established branch name such as "Erasmus Mundus" will be, both internally at the different higher education institutions (HEIs) as well as externally (especially in third countries). The higher education institutions have invested a lot of time and resources in creating awareness about the Erasmus Mundus action. "Erasmus" and "Erasmus Mundus" stand for two different kinds of activities (non-degree and degree-seeking mobility); it is important that this distinction be maintained or, better, strengthened in the course of the presentation of the new programme "Erasmus for All".

Article 16 (4) gives the "surnames" to the programme: Higher Education, Training, Schools, Youth Participation, Adult Learning, Sport [amended text]. CESAER hopes that participation in more than one of the schemes will be possible and that these names correctly identify the type of mobility addressed in order to avoid overgeneralization and confusions among young people.

Changing the name of Erasmus Mundus, which clearly meant mobility outside Europe does not seem adequate for CESAER. Naming of actions should be clear enough: Erasmus degree, Erasmus International Master or others should be considered.

3. Objectives

3.1 General objectives:

CESAER supports the approach to link the general programme objectives with the objectives of Europe 2020: reducing the number of early school leavers and increasing the number of people who reach third level education. Erasmus for All will contribute to the development of higher education in third countries and, with its strong international dimension, it increases cooperation in education and learning within the Union and beyond. European values, transnational character of mobility and cooperation and systemic impact on society in the long run are basic for a successful programme.

CESAER fully subscribes to the core characteristics of the programme: Raising the attractiveness of the European Higher Education Area, excellence, solidarity, and equity. Furthermore, CESAER emphasises that the synergies between ERASMUS for All and HORIZON 2020 and the European Research Area should be highlighted wherever possible and appropriate in order to ensure that Erasmus for All contributes also to the integration of education, research and innovation and the realisation of the knowledge triangle, an important issue that CESAER wishes to be highlighted.

3.2 Specific objectives:

Among specific objectives CESAER underlines in particular the following:

- the improvement of the level of key competences and skills to increase access to the labour market;
- participation of young people in democratic life;
- fostering quality, innovation excellence and internationalization at educational institutions;
- the modernization of education, learning and training systems;
- make European HEIs more attractive for countries outside the EU and increase mobility with them;
- improve teaching and learning;
- emphasize the teaching and learning of languages;
- promote excellence in teaching and research;
- increase ways of formal and informal learning.

CESAER is aware of the fact that this is a very long list of objectives that are also strongly interrelated. However, all these objectives must be kept on sight and will help to broaden the perspectives of internationalization in education.

The Commission also devises the creation of measurable performance indicators in addition to appropriate means to assess quality related to these objectives, a measure which CESAER regards as very positive in order to ensure that performance and achievement are evaluated also in real numbers.

4. Budget

CESAER is very positive towards the proposed budget increase of about 70% compared to the present seven years budget. CESAER considers that to be a very well justified prioritization in view of the Commission's and the member states' emphasis on the importance of raising the level and relevance of skills contributing to excellence and equity. It corresponds also to two of the five Europe 2020 headline targets, namely

i) employment (75% of the 20-64 year-olds to be employed), and

ii) education (at least 40% of 30-34-year-olds completing third level education).

It remains to be seen if the 70% increase will reflect similarly in all the areas of the programme or if it will be very selective in that sense. CESAER sees a need to pay special attention to a well distributed and balanced increase across the actions of the programme.

Regarding financial provisions, the document says that about 25% of a total budget of \in 17.299 million will be for higher education, from which \in 16.741,738 million will be for actions on education, training and youth and \in 1.812,10 million will be devoted to promote the international dimension of higher education³. In our view, the budget raise of the international dimension of the program is too limited compared to the budget raise in the European dimension.

In respect to the higher budget, it would be more appropriate to have two multi-annual allocations covering the first four years and the remaining three years respectively. Thus, we hope that there is more flexibility and that a reward mechanism is devised for those countries with a positive and good implementation of the programme (performance-based allocation of funds, as stated on page 4). The Commission should guarantee that funding can be readjusted not only in cases of "major unforeseen circumstances or important political changes"⁴, but also at a member state's request and for well justified reasons. This should prevent immobile allocations which have led to very low students' grants in the past.

CESAER recognises that the proposed budget may be disputed heavily during the consultation process with the European Council and European Parliament, but stresses the importance of preserving the suggested proportion of the overall budget for this programme which is highly important for supporting the European human resource base for the ambitious general goals of Europe2020 for sustainable growth and employment.

³ Arts. 13 (1a) and (2)

⁴ Art. 13, 2, second paragraph

5. New forms of financial provisions

The new programme foresees the opportunity to reinforce mobility and co-operation, by including the financial support to students who might consider being volunteers abroad engaged in higher education and professional education and training, as well as for teachers, training staff and youth activities promoters.

It seems adequate to use lump sums and flat rate funding for grants⁵ based on unit costs, in order to increase efficiency and reduce administrative costs; however, we expect that would also mean a realistic increase of grants for students, teachers and staff according to the cost of living in different countries. In general, we have doubts if the total budget will be high enough for the total amount of possible beneficiaries and we hope that the estimates are correct. It should be guaranteed that higher education students with good academic records and wishing to study abroad are not left behind the programme for economic reasons. We also hope that the reduction of implementation costs leads to economic incentives for those HEIs with a performance record well above the general required level.

In CESAER's view, partner institutions need to guarantee that they accept the principle of no fees payment that is demanded by the receiving institutions both for studies and for training periods. In the latter case students are often treated differently from those following standard-track studies.

CESAER members welcome the new loan warranty system to help Master degree students to finance their studies abroad and acquire the necessary capability for specific types of work requiring intensive use of their knowledge. However, we recommend that for the proposed facility careful implementation and monitoring is applied by a selected group of pioneer institutions, in the form of pilot projects. In addition, we see a need for a number of clarifications.

Regarding Article 14 (3), the "funding for guarantees for loans to students undertaking a FULL Masters degree in another participating country" is not clear. In principle, we see two main benefits of the proposed loan system: for students from third countries wishing to pursue a Master's degree in the EHEA, and for European students aiming for "vertical mobility", which is one of the Bologna objectives. However, the proposal sometimes makes reference to full Masters in another country, whereas in other parts it seems that the possibility of studying for shorter periods (a number of credits) is considered. The various aspects of encouraging the good students to leave their home institutions "completely" should be carefully investigated. Although many CESAER institutions are in favour of bachelor students going to another institution for a joint/dual/multiple Master programme, some members in the CESAER community would prefer that their students stay enrolled at their home institution for at least a minimum number of credits. On the other hand, if what the student gets is a loan, and this option excludes or eliminates the possibility of obtaining a grant, it goes against the principle of equal opportunities. If we want quality in Erasmus, high performance students should always have the possibility of going abroad without paying. Reward mechanisms always work well. Exemption of enrolment fees should be kept in

⁵ pages 4, 13, and 47

Erasmus for All to prevent that access to high quality studies becomes a profit making business. A loan is only a good option for those students that for other reasons (number of exchange grants, or other) cannot get funding.

Finally, CESAER notes that the procedures in transition period between programmes are not described clear enough, in particular for actions beginning in 2013 and extending until June, July or September 2014, although article 13.5 mentions financial provisions for this.

6. The different actions

6.1 Key action 1: Learning mobility of individuals (Article 7)

CESAER strongly supports the increased emphasis on mobility of individuals, which is in line with the need for individuals that can respond to an ever more globalised world. However, just as in Erasmus Mundus II the programme seems to give priority to student and scholar mobility, whereas the university also would like to see the dimension of non-scholar i.e. staff mobility included in Erasmus for All. This would assist the universities as well as their administrations in better understanding and addressing issues of relevance to international cooperation. Such a widening of the target groups of the programme would certainly contribute to the realisation of the modernisation agenda of higher education institutions in the European Union.

An equilibrium between incoming and outgoing students for each participating university and each country should be aimed at, as it happens in Erasmus Mundus, namely through slightly increased incentives for teachers training in common foreign languages or for making the activities in those universities better known.

It includes mobility for studies and for placements, as well as transnational mobility of staff for teaching and for professional development activities. This means that the beneficiaries of the programme will be the same as those of the LLP. However, it does not specify if the mobility for placements will be possible at both undergraduate and postgraduate levels.

We welcome that mobility flows to third countries – in both directions - can be established and supported by the "normal" Erasmus for All grants.

Likewise, mobility for high quality joint, double or multiple degrees, as well as formal and informal learning is mentioned. Nevertheless, there is no reference as to how these actions are going to be financed as the second or third year of studies have had no EU funding so far and have been supported by the sending organizations. In CESAER's opinion, this should be changed. Furthermore, we would welcome clarification about which quality criteria will be applicable. CESAER certainly supports consistent and coherent evaluation schemes for each higher education sector and the development of appropriate standards and rules.

There should be enough flexibility and possibilities for differentiation in the proposed actions for the development of joint programmes. For example, there could be funding reserved for different types of joint programmes. The type of degree (double/multiple/joint) should not be the focus of the competition for excellent joint programs.

CESAER notes that a dedicated action for curriculum development is currently not explicitly part of the proposal. However, we see that this would be important for the development of excellent joint tracks and programmes.

Also placements in industry following approaches similar to the former COMETT programme would be a most welcome activity line.

We would like to know if beneficiaries will be able to enjoy more than one academic period abroad (degree and master) or if there are going to be restrictions to mobility and also with regard to mobility within and outside the EU.

Finally, CESAER notes that academic recognition or concrete quality measures are not mentioned in the whole text of the proposal.

6.2 Key action 2: Cooperation for innovation and good practices

CESAER welcomes the support for transnational strategic partnerships between education and training organizations or other relevant sectors developing and implementing joint initiatives and promoting exchanges of experience and know-how. Transnational partnerships between education institutions and enterprises will also be supported. This is essential for increasing employment among young people and should be a priority. The knowledge triangle of integrating education, research and innovation should be a guiding principle to be applied as appropriate to the different levels of the scheme.

The new Knowledge Alliances and sector skills alliances (wide band partnerships between universities and enterprises) are most interesting for the CESAER members that are working very closely with industry. The Knowledge Alliances will provide new opportunities for cooperation with industrial partners in new areas of activities. The recent pilot activities were promising and the results will contribute to the further elaboration of the concept including clarification where necessary. CESAER members emphasise that it will be most important to keep the management requirement as simple as possible.

It is our hope that this action will not be dedicated mainly to the development and integration of entrepreneurship education and training, but will also be open to other types of university-business cooperation. CESAER would welcome a flexible approach providing room for exploring and developing new forms of cooperation and interaction with business. CESAER would also welcome ad hoc projects of networking and exchange of best practice for sharing of experiences and mutual learning. Finally, also for that action participation should be simplified and the EC financial contribution increased.

For the pilot projects during the current programming period, synergies should be exploited with similar projects already funded under the FP7 Capacities Specific programme.

Often SME's do not have adequate infrastructures to support training activities: Therefore, CESAER recommends considering finding alternative mechanisms to facilitate universityenterprise co-operation targeting SMEs.

The IT support platforms that are mentioned (peer learning, virtual mobility and exchanges of best practices) will equally require specific funding.

6.3 Key action 3: Support for Policy reform (Article 9)

This action is important for policy makers and stakeholders. CESAER is prepared and interested to get involved where appropriate, especially with regard to the Higher Education Modernisation Agenda and in the dialogue higher education systems and institutions in third countries with the aim of peer learning and cross-fertilization between education systems. Most EU national governments have already implemented ECTS, EQF, Europass and support policy dialogue but if there will be a need for some revisions or further development, CESAER will be interested to participate in the deliberations.

7. Formal and non-formal learning

Besides academic recognition, ERASMUS for All will recognize the importance of non-formal learning. In fact getting a job is not solely dependent on having the adequate diploma. Often the companies look for acquired competences. Therefore this approach is supported by CESAER.

8. Erasmus for All and Bologna

It will be crucial to ensure the recognition of study abroad phases in the context of common and joint programmes and the related degrees. There is a need to develop a systematic and coherent approach towards that issue.

It is also crucial that the new programme defines the different options with regard to mobility (and respective grant) of the same students in the three different study cycles, so that no restrictions exist on mobility at different levels of their training and education.

With the new study plans according to the Bologna system, it seems that mobility is going to be concentrated at master's level and less at degree level, as it is considered a better option at specialized courses. Will this mean that everybody wishing to study abroad will have to ask for a loan?

The draft document is not clear enough. We advise to make a clear distinction between European and non-European Masters, which is not the case in the current version.

9. The international dimension

CESAER welcomes the aim of Erasmus for All to further extend its cooperation with the world by involving more third countries i.e. non-EU countries. We welcome the new approach that will reduce the fragmentation and complexity while enhancing the visibility of the programme and the higher education system and opportunities in Europe. This will ensure closer cooperation and more efficient branding of European HEIs with partners in the European neighbourhood and outside Europe.

When developing an internationalisation strategy for higher education, CESAER recommends the Commission to take into account the potential negative consequences of limiting and promoting some geographical regions over others.

For CESAER however, the budget increase of the international dimension of the programme is too limited compared to the budget increase in the European dimension.

10. Training in foreign languages

It is not clear yet how the Erasmus Intensive Language Courses (EILC) will be financed in the future. EILCs are a very useful tool to promote less common languages in the EU, that help participants to "survive" in their host country and also contribute to a certain extent to their future professional competitiveness. In this context CESAER emphasises that these EILCs contribute to the further development of the European Research Area by reducing the language barriers.

11. Simplification

CESAER especially acknowledges the efforts of the European Commission (EC) to simplify and streamline "Erasmus for All" by aiming at increased efficiency, more opportunities to apply for funding as well as minimising overlaps of the different initiatives (Erasmus Mundus, Tempus, Alfa, Edulink and cooperation with industrialised countries). It is expected that the promised simplification and rationalisation of processes and the use of common instruments will reduce the administrative effort and complexity related to student mobility and will help HEIs to ensure consistency.

However, CESAER members have voiced concerns if the "administrative simplification"⁶ is going to be viable in reality since the proposal doesn't specify how this simplification is going to be implemented.

At present, there isn't one single database where the students can be registered and where they would be filling one single application form that should be accessible by the institutions involved in the mobility. Often they have to fill forms in both institutions. CESAER sees that as an issue to be addressed in the course of the efforts towards simplification. Therefore, we welcome the creation of a unique central register and/or data base for participants and administrators, each with different access rights.

12. Evaluation

In CESAER's view, the success of Erasmus and other programmes has been sufficiently evaluated to be able to introduce further improvements on the basis of lessons learned during implementation in the current programming period. To give just one example, albeit it is important to determine whether or not the marks attributed to the visiting students

⁶ Page 3

follow adequate standards, in many situations it appeared that there was some inflation in the marks attributed to those students in several institutions.

We hope that the evaluation in 2017⁷ about the effectiveness in reaching objectives will help the programme to improve further, after consultations where universities can transmit suggestions to National Agencies.

13. Conclusions

CESAER hopes that Erasmus for All will mean deep and systemic changes and that all the good ideas gathered in the proposed regulation will be supported by an adequate budget as proposed by the Commission and will also find the necessary budget and financial instruments to be implemented.

CESAER underlines that funding needs to be distributed according to quality and performance. The countries that will be successful will be those that display good management of resources and promote the programme in the European spirit, with a commitment to increase the participation of students, teachers and staff. For assessing the allocation of funds not only the contribution of each country to the European Union budget should be the yardstick but the quality of the participation as well as the performance and human effort in its achievement. Co-financing requirements should be as limited as possible.

Universities of technology help in developing and strengthening the productive sector of society and need a well designed and financed Erasmus for All programme to be able to continue doing so also in the future as an important contribution to the Europe 2020 strategy.

CESAER members are aware that the new programme will require an adaptation at the level of management structures at considerable costs.

Finally, the proposal includes control and audit systems without addressing many practical unresolved matters; we hope that they will be taken up by the National Agencies.

CESAER Leuven, 21 June 2012

⁷ Art. 15.2