EUROPEAN UNIVERSITY ASSOCIATION

BRIEFING

Going beyond the 20% student mobility benchmark

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Executive summary

The next Bologna Process Ministerial Conference is scheduled for 2024 in Tirana, Albania. Twenty-five years will have passed since the signature of the founding Bologna Declaration.

For a quarter of a century student mobility has been at the forefront of ministerial preoccupations. The original commitment to the 'promotion of mobility' soon gained in definition and is now a specified quantitative benchmark: **at least 20% of graduates in the European Higher Education Area (EHEA) should have experienced an academic or work placement outside their home country**.

How will ministers approach this issue in Tirana? In celebration, with concern, or with only passing reference? They have an opportunity to redefine the benchmark, for the ground is shifting. The Covid-19 pandemic and the green and digital transitions have dramatically re-shaped the landscape. The European Commission is funding a study on learning mobility, yet to be published. Its findings will inform a proposal for a Council Recommendation on a new learning mobility framework.

Now is the time to consider the viability of the benchmark, for it has never been reached.

This briefing assumes that ministers will wish to maintain the long-standing focus on internationalisation, inclusion, recognition, higher education institution (HEI) partnerships, portability of funding, data collection and data consistency.

They should do so, but this may not be sufficient to sustain credibility in the 20% benchmark. A radical re-definition of student mobility is timely and desirable.

This briefing asks for the consideration of all stakeholders, irrespective of their legal or regulatory competences. It intends to stimulate debate and to contribute to consensus-building.

Framing all the proposed discussion points is the need to consider lifting the UOE[1] and Eurostat restrictions on the admissibility of branch campuses and distance learning as modes of international mobility. A number of suggestions are listed below.

To enlarge the pool of physically mobile students:

A. Cross-border traineeships undertaken outside Erasmus+ in the framework of university-industry collaboration, whether in the context of bilateral or formal trade agreements, should be included in the mobility statistics.

B. In the legal framework of the EU's internal market, obstacles to cross-border trainee mobility should be identified and removed.

C. Consideration should be given to whether and how students in branch campuses and on franchised programmes can be regarded as mobile.

D. As a complement to the existing strong focus on inclusivity, and in view of the high incidence of physical mobility at master's and doctoral levels, efforts should be made to expand cross-border inter-cycle progression routes across binary divides.

E. Mobilities achieved in non-formal and informal prior learning (RPL-NFIL) should be recognised and counted into the benchmark.

1 The acronym UOE stands for the combined statistical operations of the UNESCO Institute of Statistics, the OECD and Eurostat.

To re-engineer the 20% benchmark:

F. Given the urgency of the digital and green transitions, physical mobility needs to be blended with virtual mobility[2] in ways which assure high quality and amenability to measurement.

G. Wide-ranging debate should be initiated in order to develop a credible, widely accepted and sensitive set of metrics on internationalisation in general and on blended and virtual learning in particular.

H. The Scoreboard which the Commission proposes to locate within the European Higher Education Sector Observatory should use the refined metrics as the basis for a new series of longitudinal data.

I. In order for refined metrics to be deployed in evolving digital mobility and recognition instruments, a fourth edition of the *ECTS Users' Guide* should promulgate precise guidelines and generate good practice.

J. If the 20% benchmark is to be retained, consideration should be given to breaking it down into cycle-based components, with the bachelor's benchmark re-set at a realistic level and the master's and doctorate benchmarks adjusted accordingly.

The history of the 20% benchmark has been one of gradual re-specification, from an initial aspiration to a quantified minimum and a timeline. Since the 2020 target date, Covid-19, the war in Ukraine, and Brexit have seriously disrupted the mobility growth curve. The pandemic accelerated a shift to online learning. The war in Ukraine prompted forced student mobility. Brexit has distorted the direction and volume of mobility flows.

This briefing suggests that the benchmark's catchment might be widened to include other mobile student populations: graduate trainees who move outside the scope of Erasmus+; students in branch campuses and on foreign franchise programmes; students whose mobility might be constrained by binary systems and, most significant in terms of numbers, students engaged in cross-border virtual learning.

But the virtually mobile raise complex issues. Should they be counted into the benchmark? If so, by what system of metrics? Which categories of blended mobility can convincingly count as foreign educational experiences?

The attached paper explores these issues in detail, in the hope of contributing to a new consensus.

2 In this briefing we use the term 'virtual mobility' with caution. It is increasingly widely used, including in the Erasmus+ programme. The UNESCO International Institute for Higher Education in Latin America and the Caribbean (IESALC) defines it as "a form of mobility that uses information and communication technologies to facilitate cross-border and/or inter-institutional academic, cultural, and experiential exchanges and collaboration which may be credit-bearing or not for credit." However, the assertion that virtual cross-border interaction constitutes mobility is by no means universally accepted.

Contents

The history of the 20% student mobility benchmark

1. Cross-border student mobility has long been a priority for European ministers of higher education and for the EU institutions. They have consistently argued that academic placements abroad bring educational and cultural benefits to students and systems, as well as economic benefits to the countries concerned. One year before the launch of the Bologna Process in 1999, four EU member states (France, Germany, Italy and the UK) envisaged in their Sorbonne Declaration that:

   > "at both undergraduate and graduate level, students would be encouraged to spend at least one semester" [in a foreign HEI].

2. It took some years before the Bologna ministers, meeting in London (2007), resolved to ask the European Commission (Eurostat), in conjunction with Eurostudent:

   > "to develop comparable and reliable indicators and data to measure progress towards the overall objective for the social dimension and student and staff mobility in all Bologna countries"

3. In Leuven and Louvain-la-Neuve (2009), they formalised the benchmark, giving it content and a timeline:

   > "In 2020, at least 20% of those graduating in the European Higher Education Area should have had a study or training period abroad."

4. In a parallel development in 2011, the Council of the EU adopted the same benchmark and asked the European Commission to submit a progress report in 2015[3].

5. In the following year, Bologna ministers (Bucharest 2012) requested Eurostat, Eurydice and Eurostudent to provide:

   > "more benchmarked data collection and referencing against common indicators, particularly on employability, the social dimension, lifelong learning, internationalisation, portability of grants/loans, and student and staff mobility".

6. In 2017, the European Commission delivered the progress report requested in 2011. It revealed that in 2013 mobility had stood at a lowly 2.9%, but pointed out that the figure was misleading. The statistics available on degree mobility were only partial. Moreover, on credit mobility there was no useable data at all – even in Erasmus+, which recorded enrolment data but not the graduation data in which mobility figures would be embedded. The Commission saw no reason to downgrade the benchmark. It considered that the data collected over the reference period 2016-2020 would be significantly richer and that the close examination of 2016 and 2017 data would be a sound basis for future policy making.

7. Subsequently, in Paris (2018), the Bologna ministers mandated the Bologna Follow-Up Group (BFUG):

   > "to develop a Bologna Process Implementation Report assessing the main developments in the EHEA since the Bologna Process began, including to what extent we have fulfilled the mobility benchmark agreed in Leuven/Louvain-la-Neuve in 2009".

8. Finally, in Rome (2020) they resolved to reaffirm the benchmark "that at least 20% of those graduating in the EHEA should have experienced a study or training period abroad". They further committed to:

   > "enabling all learners to acquire international and intercultural competences through internationalisation of the curricula or participation in innovative international environments in their home institutions, and to experience some form of mobility, whether in physical, digitally enhanced (virtual) or blended formats."

3 Council conclusions 2011/c372/08

9. The benchmark has never been reached. Moreover, until very recently ministers have been unable to ascertain exactly by what margin it was being missed. The data available was not fit for purpose. Throughout most of the years of the Bologna Process they have struggled to gain a clear view of the situation on the ground. In retrospect it is striking to see how many times they have repeated their call for improved data collection at European level. Even in Paris (2018), as we have seen, they were still in the dark. It was only with the publication of the 2020 edition of the Bologna Process Implementation Report that an accurate picture emerged. The Report's findings are examined in sections 14-21 below.

Inadequate data was not the only obstacle to the expansion of mobility

10. The absence of reliable data was only one of the factors impeding the drive to promote mobility. The word 'obstacle' recurs frequently in the early Communiqués (Bologna 1999, Prague 2001, Berlin 2003, Bergen 2005, London 2007, Bucharest 2012). It then recedes from view – not because the obstacles are removed, but because the potential remedies become more apparent.

11. The table below shows the chronology of the recognition of the obstacles and the measures proposed to address them:

First mention	Mobility-related issue	Reiteration(s)
Berlin 2003	Call for improved quality and coverage of data on mobility	Bergen 2005, London 2007, Leuven / Louvain-la-Neuve 2009
Berlin 2003	Facilitating the (cross-border) portability of grants and loans	Bergen 2005, London 2007, Bucharest 2012, Yerevan 2015
Berlin 2003	Efforts to boost the number of mobile doctoral students and post-docs	Bucharest 2012
Bergen 2005	Easing of visa, work permit and other immigration and residence requirements	London 2007
London 2007	European Commission (Eurostat) and Eurostudent requested to develop comparable and reliable indicators and data to measure progress towards student and staff mobility	Leuven / Louvain-la-Neuve 2009
London 2007	Recognition, further specified as automatic recognition (2012) and backed by compliance in the area of quality assurance (2018)	Bucharest 2012, Paris 2018
London 2007	Joint programmes, flexible curricula, and mobility windows	Leuven / Louvain-la-Neuve 2009, Bucharest 2012, Paris 2018
London 2007	Qualifications frameworks	
London 2007	Networks of national experts	
Leuven / Louvain-la-Neuve 2009	Setting of the benchmark: "In 2020, at least 20% of those graduating in the European Higher Education Area should have had a study or training period abroad."	Rome 2020
Bucharest 2012	Request for "more benchmarked data collection and referencing against common indicators, particularly on employability, the social dimension, lifelong learning, internationalisation, portability of grants/loans, and student and staff mobility". Eurostat, Eurydice and Eurostudent charged with reporting back in 2015.	
Bucharest 2012	Internationalisation of HE	Rome 2020

First mention	Mobility-related issue	Reiteration(s)
Yerevan 2015	Emphasis on the links between mobility and competences; the importance of labour market considerations was made explicit in 2018	Paris 2018
Yerevan 2015	Promotion of mobility of disadvantaged students, including those in conflict areas	
Yerevan 2015	Mobility of teacher education students	
Paris 2018	Digitalisation of mobility instruments	Rome 2020
Rome 2020	Virtual and blended learning provision	

12. The third, and most recent, edition of the Commission's Mobility Scoreboard[4] makes no mention of the benchmark. The name is misleading, for the focus of the Scoreboard is qualitative rather than quantitative. It uses the familiar traffic light code[5] to display the progress made by national systems in the elimination of the obstacles to mobility: information provision, language preparation, portability of funding and recognition. It asks whether benchmarked strategies exist and at what level they are elaborated. It covers EU member states, the European Economic Area (EEA) and European Free Trade Area (EFTA) countries, additional Erasmus+ programme countries (North Macedonia, Serbia, Türkiye), as well as the candidate countries Albania, Bosnia and Herzegovina, and Montenegro. It therefore omits from its coverage Belarus, Russia, Ukraine, as well as the UK, a major player in international student mobility.

13. The Scoreboard's broad conclusion affords only limited encouragement. "Overall, for most countries learning mobility has not been a dynamic policy area during the 8 years covered by the Mobility Scoreboard [i.e. since its previous edition in 2015]. Although most changes have been positive, leading to improvement in the indicators, the overall picture remains rather static, and indeed around a third of European education systems are in a very similar situation today as they were in 2015/2016."

How is the 20% benchmark calculated and is it within reach?

14. For accurate quantitative data, we have to turn to the *Implementation Report*, requested by ministers in Paris (2018) and duly submitted to them in Rome (2020). The Report shares the Scoreboard's reluctance to celebrate any major achievement. Its summary statement strives to appear nuanced, but it has to concede that many of the oft-cited obstacles persist:

> Despite problems in measuring accurately the different forms of student mobility, it is clear that international student mobility has grown considerably during the past two decades.
>
> Nevertheless, the benchmark of 20 % of graduates experiencing mobility by 2020 has not been met. The setting of the 20 % mobility benchmark did nevertheless create new momentum to stimulate international student mobility by repositioning it at the top of the ministerial agenda. It also gave a significant push to improving the international data collections on mobility in general, and on credit mobility in particular. Attention to recognition practice, ECTS, Diploma Supplement and portability of student support are also likely to have facilitated both credit and degree mobility. Moreover, the introduction of a common three-cycle degree system has made it much easier to complete one cycle in one country and then study another cycle in a different country. [p.11]

4 Eurydice, European Education and Culture Executive Agency, April 2023
5 See the Scoreboard's summary Figure A on p.72

15. The Report goes on (pp.127 *et seq*) to discuss physical degree and credit mobility, recognition, grants and loans, and internationalisation. It is in section 5.2 (pp.134-156) that we find the granular analysis of mobility flows requested by ministers. Broadly speaking, it notes, reliable data came on stream only in 2016. Yet even at its time of writing in 2020, conflicting definitions of 'country of origin' muddied the statistics: two thirds of EHEA countries held the country of origin to be where the certificate of upper secondary education had been obtained (as per the UOE definition[6]), but 15 countries used the less directly relevant criterion of nationality/citizenship (p.135). This mattered, since the co-existence of inconsistent data sets would likely reduce the accuracy of mobility totals and relegate them to the status of approximations, however useful they might be. Efforts to persuade all relevant countries to adopt the same methodology continue.

WHAT IS THE UOE?

The UOE is the data collection assembled jointly by the UNESCO Institute of Statistics, the OECD, and Eurostat. It holds data on students enrolled, entrants, graduates, personnel, foreign language learning, education expenditure, and mobility.

While nominally recording volumes of outward physical mobility, UOE gathers data from the *destination countries* – to which the mobile students are incoming. UNESCO and OECD participation is necessary because many destination countries are outside Europe.

UOE defines the *country of origin* primarily as the location of upper secondary education. It accepts country of usual or permanent residence as an alternative, while admitting citizenship only as a last resort.

16. The European Commission's *Methodological manual on learning mobility in higher education* (July 2015 version, published by Eurostat) reproduces much of the original text of the *UOE Data Collection Manual*, amplifying it for the European context. It points out (p.6) that, crucially, all outward mobility is normally reckoned from the country in which the student completed her/his upper secondary education. If this is country X, then it follows – and is duly signalled in the text – that her/his subsequent degree mobility from bachelor's to master's or from master's to doctorate between country Y and country Z cannot be attributed to country Y; instead, it accrues to the mobility balance of country X. This distorts the mobility figures at country level while ensuring an accurate overall total.

17. The EU Manual also indicates – less problematically – that credit mobility undertaken during periods of degree mobility must be discounted in order to avoid double counting. (In addition, it contains a relevant prescription on distance learning, which we discuss in sections 42 *et seq* below.)

18. Let us return to the 2020 Bologna Implementation Report. When measuring the 2017 mobility rates against the Bologna benchmark of 20% it looks first at the data available on total outward mobility (i.e. credit and degree, from short cycle pre-bachelor's through to doctoral levels). It finds (figure 5.1, p.136) that only four countries break through the 20% barrier, leaving 38 falling short, and giving an across-the-board outward mobility rate of 9.4%. Broken down, this represents the sum of 5.9% (credit) and 3.5% (degree).

19. Overall, in 2017, the EHEA had not advanced even half-way to its 2009 benchmark. However, the Report's figure 5.2 (p.138) shows combined mobility rates at master's and doctoral levels to be relatively healthy. So much so, that if they were considered in isolation from bachelor's level, "the EHEA as a whole would actually be close to the 20% benchmark". The Report finds that credit mobility is highest at master's level (figure 5.3), while degree mobility is highest at doctoral level (figure 5.4). The master's and doctorate percentages are of course expressions of diminishing total student number at those levels, since each level excludes students who have not progressed from the level below.

6 The acronym UOE stands for the combined statistical operations of the UNESCO Institute of Statistics, the OECD, and Eurostat. For definition and discussion of the country of origin, see the *UOE Data Collection Manual,* 2020, at http://uis.unesco.org/en/files/uoe-data-collection-manual-2020-en-pdf

20. "With hindsight", it concludes, "it seems that [the 20%] benchmark was set somewhat blindly, as countries were unaware of the actual reality of student mobility in 2009, and insufficient account was taken of general increases in student numbers". Given the figures quoted, the Report's candid conclusion is unsurprising: the benchmark has been missed – despite the positive work in developing mobility instruments, internationalisation, recognition, inclusion, and joint degrees.

21. The Report is based on mobility statistics collected from the 47 EHEA countries – that is to say, 47 potential countries of origin. The Eurostat Manual, however, considers only countries of origin which are EU member states (of which, in 2015, there were 28). Mobility volumes counted at EHEA level are therefore greater than those at EU level. It must be possible to disaggregate the latter from the former. Even if this were done, of course, the mobility percentages might be the same. Suffice it to say that the distinction is rarely, if ever, made and that policy seems happy to live with the elision.

Traineeships in Europe

22. Semesters and years abroad undertaken for the purpose of academic study are not the only mode of reckonable credit mobility. The benchmark also encompasses work placements – what the 2020 Bologna Implementation Report refers to as "study-related traineeships". The UOE Manual (2020) notes that "at this stage no international definition of traineeship exists". It adds that "the purpose of the traineeship is to help a trainee to adapt to requirements of EU labour market, acquiring specific skills and enhancing of understanding of the economic and social environment of the country concerned, while gaining work experience."[7]

23. The Eurostat Manual speaks of work placements rather than traineeships. Explicitly invoking Erasmus+, it notes that such placements can be organised by consortia of at least one HEI with at least one enterprise/association/chambers of commerce/foundation, etc.[8] And indeed, the current Erasmus+ programme offers financial support for cross-border traineeships[9] undertaken within and beyond the EU; these, as a matter of course, feature in its mobility statistics. A salient feature of Erasmus+ provision is that it supports traineeships undertaken in the year following graduation, as well as those undertaken on-course.

24. As for the Bologna Process, it is curious that the term 'traineeship' is nowhere used in any of the ministerial Communiqués or their appendices/annexes. Nor is there any reference to internships. This, despite the conjoined priorities of mobility and employability. The proxy term 'placement' first appeared in Leuven / Louvain-la-Neuve (2009), when ministers encouraged "work placements embedded in study programmes as well as on-the-job learning". The point was made again in Yerevan in 2015 and in Paris in 2020. But the topic appeared only once more – in the contextually circumscribed Belarus Strategy set out in Paris Appendix II (2020). Traineeships have not enjoyed a high profile in Bologna discourse.

25. This leads one to ask whether traineeships undertaken outside Erasmus+ feature in the EU and EHEA mobility totals. In what frameworks are they located and how might their numbers be increased? The *Morgenbesser* ruling (C 313/01) by the Court of Justice of the European Union (CJEU) in 2003 is instructive in this regard (see paragraph 27 below). At this point, however, a brief digression is necessary.

26. As the UEO Manual indicates, the question of traineeships leads directly into consideration of labour market access. The largest labour market in the EHEA is the EU's internal market, in which cross-border service delivery and the recognition of qualifications have been shaped by a long succession of legislative acts and judicial rulings, including *Morgenbesser*. The EU focus on traineeships is strong. In a recent strategy document the Commission stated its aim to "boost Erasmus+ traineeships abroad, reaching more than 100,000 trainees every year, through student peer reviews and traineeships in start-ups and entrepreneurial organisations."[10]

7 *UOE Data Collection Manual, 2020, op.cit.*, p.35
8 *Methodological manual on learning mobility in higher education,* European Commission (Eurostat) 2015, p.24
9 Erasmus + Programme Guide 2023 v1, esp. pp. 48 and 54
10 *European Strategy for Universities*, January 2022, p.9.

In June of this year the European Parliament passed a Resolution supporting the Commission's move to update the Council Recommendation on a Quality Framework for Traineeships (2014)[11]. In the same spirit, student organisations have recently lobbied for a quality charter for trainees in the Erasmus+ programme.[12] The Parliament's Resolution contains in annex proposals for a Directive and a Decision. The latter features a draft Article 10 on cross-border traineeships:

> **CROSS-BORDER TRAINEESHIPS**
>
> 1. Member States shall facilitate the cross-border mobility of trainees in the Union, inter alia by clarifying the national legal framework for traineeships and establishing clear rules on hosting trainees from, and the sending of trainees to, other Member States and by reducing administrative formalities.
> 2. In the case of third-country nationals carrying out traineeships within the Union, Member States shall facilitate the application of the QFT to them.
> 3. In the case of mobility outside the Union, Member States shall promote respect for the QFT in agreements between educational institutions and traineeship providers.

27. EU law, however, already covers traineeships – in the context of the recognition of professional qualifications. Article 55a of the Directive on the Recognition of Professional Qualifications concerns the mandatory periods of training imposed by national competent authorities for accession to a profession. It allows the traineeships required in one member state to be undertaken in another, subject to appropriate guidelines being published by the authority, in particular regarding the role of the trainee's supervisor. Recital 27, boxed below, makes it clear that the intention is to foster cross-border traineeships. The 'young graduates' to which it refers would in principle, in the year following their graduation, be eligible for Erasmus+ support. In this sense, mobile students/trainees fall within the scope of the Directive. Logically, they should be reckonable within the benchmark, even if they are mobile outside Erasmus+.

> National rules organising the access to regulated professions should not constitute an obstacle to the mobility of young graduates. Therefore, when a graduate completes a professional traineeship in another Member State, the traineeship in question should be recognised when the graduate applies for accessing a regulated profession in the home Member State. The recognition of a professional traineeship completed in another Member State should be based on a clear written description of learning objectives and assigned tasks, to be determined by the trainee's supervisor in the host Member State. Professional traineeships completed in third countries should be taken into account by Member States when considering a request to access a regulated profession.

11 2014/C 88/01, at https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327(01)

12 See the *Erasmus+ Review 2021-2022*, published by EUF, ESN and ESU, May 2023, p.28. See also ESU's detailed recommendations at https://esu-online.org/policies/bm84-ensure-quality-internshipstraineeships-and-apprenticeships-in-europe/

28. This provision derives from the *Morgenbesser* judgment. Here, the CJEU ruling allowed that citizens of any member state could, in any other member state, engage in traineeships relevant to accession to a regulated profession. This supra-national freedom was not, however, codified in Article 55a of the amended Directive, despite the wishes of the Commission. In the event, as Lavinia Kortese points out, "Article 55a is only applicable to individuals who go abroad for a traineeship and return to their home Member State (i.e. the Member State where they received education and training) which requires a professional traineeship for them to gain access to a profession."[13] It does not allow a trainee from MS1 to complete a period of training in MS2 in order to access a profession in MS3. The incentive for students to seek traineeships abroad is thereby reduced. This could be remedied through the next scheduled review of the Directive.

HOW DOES THE EU MANAGE PROFESSIONAL RECOGNITION?

Directive 2006/35/EC on the recognition of professional qualifications was amended by Directive 2013/55/EU; a consolidated version is now in force. It concerns cross-border mobility in the regulated professions, setting them into three categories. The craft professions are of no significant relevance to higher education. The 'general system' covers the majority of professions; here, recognition depends on application of compensation mechanisms in cases of substantial difference between a professional qualification in the home MS and its parallel qualification in the host MS. The third category, the 'sectoral professions' enjoy automatic recognition: medical doctors, dentists, veterinarians, general care nurses, midwives, pharmacists and architects.

Note that recognition does not guarantee labour market access, just as recognition of an academic qualification does not guarantee admission to an HEI.

29. Mutually inconsistent national regulatory regimes also have the effect of reducing the scope for cross-border traineeships. A case study conducted by the Institute for Transnational and Euregional cross-border cooperation and Mobility (ITEM), at the University of Maastricht, examined the training requirements of paediatricians in Belgium (French Community), Germany (North Rhine-Westphalia), and the Netherlands. In 2018, the distribution of specialist paediatricians, in terms of *per capita* of children, was uneven, both within and between member states. There was therefore demand and scope for the cross-border mobility of both qualified doctors and patients. However, only in Germany did the specialty of paediatric surgeon exist formally in the taxonomy of the Directive. Moreover, the training programmes and the accreditation requirements placed on training centres varied substantially between the three administrations. As a result, cross-border traineeships proved extremely problematic.

30. The ITEM study envisaged that the situation would be eased by application of the Regulation on a mechanism to resolve legal and administrative obstacles in a cross-border context, proposed by the Commission in May 2018. A training institute wishing to cater to the needs of trainees from all three countries could avail itself of the provision which "allows for the application in one Member State, with regard to a cross-border region, of the legal provisions from another Member State, where the application of the legal provisions of the former would constitute a legal obstacle hampering the implementation of a joint project"[14]. The Regulation has not yet been adopted.

31. The *Morgenbesser* ruling and the study of paediatricians suggest that EU legislation on professional qualifications could usefully be mapped, with a view to revealing in what ways it inhibits the cross-border mobility of trainees and how it might be appropriately amended. This would be of immediate benefit to EU member states and EEA countries, as well as – in due course – to candidate and applicant countries grappling with the accession criteria and the *acquis communautaire*. And also, necessarily, to the 51 higher education systems of the EHEA and their efforts to reach the mobility benchmark. No such initiative is on the horizon, however.

13 Kortese, L S J, *The Recognition of Qualifications in the EU: Blurring the Lines of Competences between the Internal Market and Education*, doctoral thesis, University of Maastricht, 2020, p.180. For this and the following paragraphs I am indebted to Dr Kortese's for access to her thesis.

14 COM(2018) 373 final, p. 16

Traineeships outside Europe

32. The intra-EU dimension of mobile traineeships is important, but EU trade policies and practice are also worth considering. Three years after the Treaty of Maastricht, the General Agreement on Trade in Services (GATS), adopted by the World Trade Organisation (WTO) in 1994, came into effect. Although the vast majority of EHEA countries are members of the WTO, Bologna ministers have never alluded to this fact. Yet it is common practice in EU trade agreements to recognise the category of *graduate trainee* or *trainee employee* as falling within the scope of GATS Art.1.1(d). This Article indicates that cross-border services can be delivered by 'natural persons' (i.e. individuals, as opposed to 'legal persons', multi-person entities with a legal status). Definitions and commitments vary, because the GATS Annex "on movement of natural persons supplying services under the agreement" leaves it up to WTO Members to negotiate specific commitments for specific categories of individuals.

WHAT CATEGORIES OF SERVICES ARE RELEVANT TO HIGHER EDUCATION?

The GATS specifies four modes:

- Mode 1: cross-border service provision, e.g. distance learning
- Mode 2 : service consumption abroad, e.g. credit and degree mobility
- Mode 3: service provider established abroad, e.g. branch campus
- Mode 4: cross-border service provision by natural persons, e.g. trainees

The GATS applies to trade relations between WTO member countries.

Note that international service providers such as HEIs can develop business practices which operationalise all four modes in conjunction.

33. By way of example, the EU's Comprehensive Economic and Trade Agreement (CETA) with Canada defines graduate trainees as "natural persons who: (A) possess a university degree; and (B) are temporarily transferred to an enterprise in the territory of the other Party for career development purposes, or to obtain training in business techniques or methods" (Art.10.1(c),(iii)). Such persons might well be transferred in their first year of employment following graduation, in which case they would fall into the category of those eligible for Erasmus+ funding.

34. A slightly different definition of graduate trainees is found in the EU's Free Trade Agreement (FTA) with Singapore: "natural persons who have been employed by a juridical person of a Party for at least one year, who possess a university degree and who are temporarily transferred to an establishment in the territory of the other Party for career development purposes or to obtain training in business techniques or methods" (Art.8.13,2b). The FTA with South Korea has the same wording (Art.7.17,2b). The term *trainee employee* is also used, for example in the FTA with Viet Nam (Art.8.13, 2(i)) and the post-Brexit Trade and Cooperation Agreement (TCA) (Art.140.5g) with the UK, but the substance is the same.

35. These trade agreements do not specify whether such persons should also be students. As they will have been employed for one year prior to their traineeship, they do not belong to the same category as those covered in the CETA. Nevertheless, they may well be pursuing further academic studies at master's or doctoral level, on their own initiative or in agreement with and perhaps sponsored by their employer. If so, their posting to the country of the trade partner is likely to be a study-related placement. However, it is doubtful that they will ever find their way into the mobility statistics on which the benchmark is based.

36. The graduate trainee category is an interesting one: in the GATS, the trainee is construed as a service provider; in Erasmus+, to put it in the language of trade, as a service recipient or consumer. Either way, its status as a mobility is clear. A mapping and annual count of the non-Erasmus+ mobile graduate trainee population (GATS mode 4), undertaken by the ministries of trade and higher education in the EU member states and in the FTA partner countries, would be informative and useful.

How do branch campuses stand in relation to the mobility benchmark?

37. The four GATS modes accommodate the provision of higher education services between WTO member countries; these services may well include physical student mobility. While Erasmus+ credit mobility is logged into the benchmark calculations, this may not be the case with the mobility associated with intra-EU professional development and with international trade. If the 20% benchmark is to be reached, these apparently extraneous incidences of mobility are worth examining and auditing.

38. In GATS mode 4 it is the natural person who is mobile. In GATS mode 3, by contrast, it is the enterprise. The setting up of a branch campus in a foreign country is likely to constitute, in the language of the GATS, a 'commercial presence'. Questions raised in connection with the legality of the establishment of higher education institutions have on occasion been brought to the CJEU. In *Neri* (C-153/02), a case in which the dispute was between two member states, the Court invoked Article 43 of the Treaty of Rome (now Article 49 of the Treaty on the Functioning of the European Union - TFEU) as the basis of its ruling: "Within the framework of the provisions set out below, restrictions on the freedom of establishment of nationals of a Member State in the territory of another Member State shall be prohibited. Such prohibition shall also apply to restrictions on the setting-up of agencies, branches or subsidiaries by nationals of any Member State established in the territory of any Member State."

39. When the issue of establishment involved a third country, as in the dispute between the Central European University (accredited in the USA) and the Hungarian government (C 66/18), the Court pointed out that, as an international agreement entered into by the European Union on the basis of its exclusive competence in the field, the GATS was fully integrated into EU law. In its judgment, the Court deemed Hungary to have failed in its obligation to comply with the principle of national treatment set out in the GATS Article XVII.1: [...] each Member [of the WTO] shall accord to services and service suppliers of any other Member, in respect of all measures affecting the supply of services, treatment no less favourable than that it accords to its own like services and service suppliers."

40. In and beyond the EHEA there are a number of branch campuses, legally established by parent institutions based in the EHEA. They normally operate in the framework of agreements between a higher education institution in country A and the government of country B. Note that country A is not necessarily an EHEA country or a WTO member. Should students enrolled in a mobile university be regarded as mobile? The question is legitimate. While studying in country B, their curricula, learning resources, teaching and counselling staff, and final qualification may, partially or wholly, be foreign. (We disregard here the question of student mobility between the parent and the branch: in Erasmus + it is deemed ineligible if both campuses operate under the same Erasmus Charter.) The same argument may be made in respect of franchise agreements. Indeed, when students in branch and franchisee campuses are also in receipt of distance learning tuition delivered virtually from the parent or franchisor institution (GATS mode 1 – 'cross-border supply' of services), they may be said to be the beneficiaries of a form of blended mobility – even though the blending of physical and virtual would take place in only one location. (We discuss the concept of blended learning in the next section.)

41. However, the UOE Manual enunciates a crucial principle which is impossible to ignore:

> "Any transfer between education systems which does not involve the physical crossing of an international border is not considered as **international learning mobility**." (Emphasis in the original, p.34). The exclusion applies specifically to:
>
> "programmes offered to students originating from the reporting country by foreign-based institutions based in the reporting country leading to foreign degrees".

So much for branch campuses, it seems. But the question arises as to whether this principle is negotiable in the future. If the benchmark is adapted to the point at which categories of non-physical mobility can be counted, is it then compromised beyond the limits of credibility? Or are there compensatory elements

of international academic and cultural experience which at once redeem it and render it more achievable? This briefing (para.64 below) offers considerations which might help provide answers, but ultimately, the matter is resolvable only by the emergence of a strong and convincing consensus one way or the other.

Virtual and blended mobility

42. The same issue appears with much greater urgency in the context of the post-pandemic digital transition, this time in connection with what have come to be called 'virtual' and 'blended' mobility. Notwithstanding the urgency, the UOE Manual also discounts:

> "distance learning programmes provided by institutions based in the reporting country to students based in another country".

And the Eurostat Manual confirms the exclusion of:

> "distance learning programmes (which may be provided via e-learning) offered by institutions based in a country different from the one where the learner is based" .

43. At their summit in Rome in 2020, when re-affirming the 20% benchmark, ministers nevertheless further committed to

> "**enabling all learners** to **acquire international and intercultural competences through internationalisation of the curricula** or participation in **innovative international environments** in their home institutions, **and to experience some form of mobility**, whether in physical, digitally enhanced (virtual) or blended formats."[15]

Distance learning materials received from abroad and utilised by a student 'at home' are mobile, that much is clear. But can the student also be considered mobile, as ministers appear to suggest? The UOE Manual, as we have seen, dismisses the possibility out of hand.

44. However, for the higher education sector and its policy makers, the question seems already to have received a positive answer. The future mobility model is one which fuses physical, virtual, and blended. The European Universities Initiative (EUI) is a case in point. It allows large university alliances from different European countries to collaborate on learning and teaching provision. Institutions commit to align their education offer and to render 50% [sic] of their students mobile. Its factsheet promises inter-university campuses, where "students, staff and researchers enjoy **seamless mobility**[16] (physical, virtual or blended) to study, train, teach, do research, work or share services at cooperating partner institutions". A seductive formulation, sufficiently imprecise to allow the consortia to develop strategies and measures appropriate to their disciplinary focus and their geographical circumstances. Although all will operate within the same funding framework and overall rationale (including the obligation to respect the green and inclusion imperatives, as well as the digital), seamlessness is likely to yield a wide range of models and practices.

45. A study of the first four years of the EUI commissioned by the European Parliament found that the initiative was financially unsustainable, largely due to the transaction costs forced on participants by their incompatible regulatory frameworks. It was more optimistic regarding the modes of blended learning developed during the pandemic: "these new forms are more inclusive, fit better to regular programmes and thus attract a larger student population." The same positive spirit informs the responses to the Commission's projected Joint European Degree template: stakeholders assume that it will help embed and boost all modes of mobility.[17] On the other hand, there remains the lingering fear that – irrespective of the pandemic – the growth of blended learning may depress the level of physical mobility. Indeed, the researchers heard from their focus groups that "mobility is not seen as a burden for their curriculum as students are free to choose if they want to be (internationally) mobile". It is risky to assume that

15 The emphases are in the original.
16 The emphasis is in the original.
17 See the PPMI Report to the Commission on 'The Road towards a possible joint European Degree', p.84.

university alliances will boost the level of physical mobility to within reach of the 20% benchmark. Indeed, the study notes that:

> "the benchmark of 50 % student mobility within the alliances is perceived by coordinators and presidents of EUAs as difficult to achieve." (p.45).

46. The European Universities Initiative is innovative, but only to a degree, for the Erasmus+ programme, with its much wider reach, also provides financial support for blended learning. The 2023 Programme Guide reads as follows:

> [HEIs] should promote blended mobility, the combination of a physical mobility with a virtual component, within their institution to offer more flexible mobility formats and further enhance the learning outcomes and impact of physical mobility. HEIs must ensure the quality of blended mobility activities and formal recognition for participation in blended mobility, including the virtual component.

The programme conceives blended mobility as a supplement to physical mobility (for students who can undertake only short placements) or as an enrichment of it (by widening the scope of group learning). The Guide specifies that "a blended mobility for studies must award a minimum of 3 ECTS credits" [p.55]. In other words, in a typical full-time semester of ECTS 30the blended component must not fall below 10% of the total experience. Whether this refers to a module consisting of physical and virtual components or only to one or the other is not clear. The fact that the virtual learning can be accessed in any of the consortium partners is a further element of imprecision. Does it all mean that a student satisfying the minimum requirement would be reckoned to be 5% mobile over an academic year of ECTS 60 and counted as such in the annual pan-European total? The percentage would satisfy neither the Sorbonne ministers' insistence on "at least one semester" nor the minimum of three months or ECTS 15 stipulated by their successors in 2009. On this issue the Guide is silent.

47. Distinct from the blended mobility discussed above is the option of the "blended intensive programme". In this case, "physical mobility must last between 5 days and 30 days (excluding travel time) and be combined with a compulsory virtual component facilitating collaborative online learning exchange and teamwork" (p.55). There is no specified duration for the virtual element, but it must – within the minimal element of ECTS 3 – bring "the learners together online to work collectively and simultaneously on specific assignments that are integrated in the blended intensive programme and count towards the overall learning outcomes" (p.62).

48. We are faced with several questions. Can cross-border virtual learning *per se* be regarded as mobility? Or is it only in conjunction with physical mobility? Is a sequence of cross-border virtual and physical mobility sufficient to merit the designation 'blended'? If some of the components dismissed by the UOE eventually become reckonable within the benchmark, if only in combination with physical mobility, what is the computational methodology that will be sufficiently sensitive to quantify the range of mobility profiles that will inevitably emerge?

49. Blended mobility has neither a precise definition nor a stable presence in the EU-funded programmes. The European University Initiative, by invoking the principle of 'seamlessness', would appear to highly dependent on blending, as well as being obliged to credit it, albeit in a variety of ways, as mobility. In the Erasmus Mundus Joint Master's Degree scheme, by contrast, virtual mobility is ruled out. Virtual learning may well take place, but it cannot count as a mobility if it replaces physical mobility. The prescription is categorical:

> EMJM must include compulsory physical mobility for all enrolled students (EMJM scholarship-holders or not) consisting of a minimum of two study periods in two countries, of which at least one must be a EU Member State or third country associated to the Programme. These two countries must be different from the country of residence of the student at enrolment stage. Each of the two mandatory study periods must correspond to a workload of at least one academic semester (30 ECTS credits or equivalent). [...] Compulsory mobility periods cannot be replaced by virtual mobility (distance learning).

50. In its Thematic Peer Group (TPG) report, Digitally competent teachers, the DIGI-HE project led by the European University Association proposed a definition of blended course delivery, as distinct from face-to-face, online, hybrid and hyFlex. The blended mode has the following characteristics (2023, p. 16):
    - Teachers and all students onsite in class (synchronous, i.e. with scope for simultaneous physical and virtual interaction), and online at other times (asynchronous, i.e. physical and virtual interactions in discontinuous sequence).
    - Onsite and online activities are clearly identified and organised by the institution, on a clear schedule.
    - Seamlessly integrated online and in-person learning activities.
    - 30-80% online activities.

51. Blended course delivery, however, has no necessary cross-border dimension, notably when the collaborating institutions are located within the same higher education system. The European Association of Distance Teaching Universities (EADTU) has tabulated the different permutations of blended mobility:
    - short-term | long-term | intermittent
    - synchronous | asynchronous
    - one-campus | multi-campus
    - online mobility supporting physical mobility or physical mobility supporting online mobility

    When the institutions collaborating on a student exchange programme are located in different countries, it is legitimate to talk of mobility. The assumption here is that both physical and virtual interactions have a cross-border character, but while this is necessarily true of the physical it is not necessarily true of the virtual; if the virtual is wholly undertaken in-house in the home university, there is no blended mobility.

52. Cross-border physical mobility is measurable: one student in transit is an integer of mobility. The problem posed by blended mobility lies in the difficulty of measuring the cross-border utilisation of learning and teaching materials by the student. It must be quantifiable if it is to count meaningfully as a mobility. And unless it can count meaningfully as a mobility, it is irrelevant to the attainment of the 20% benchmark. The benchmark therefore demands a refined set of metrics able to assign relative values to the quantitative and qualitative components of a blended mobility experience. Such a set would have to take due account of the mode and strength of the combination of virtual with physical mobility. Until a methodology emerges, it is difficult to see how blended mobility might contribute to the mobility benchmark.

53. Underlying this issue is the challenge posed by measuring the 'internationality' of the learning experience which the Bologna ministers resolved to foster. The same question, as discussed earlier, applies to studies conducted in branch campuses and on franchised programmes. The bland assertion that any quantum of interaction with a foreign learning process renders the whole experience international is not helpful; it can lead to an accounting system so insensitive as to be practically useless. And when the value-added can be argued only intuitively, it becomes difficult to justify commitments of time and money. What is needed are criteria to define the levels of intensity and productivity of international experience – and the metrics to quantify the internationality of institutions, student and staff bodies, research collaborations, and course components. For example, will the learning outcomes of a module taken 'at home' differ, at least in part, from those of the same module taken 'abroad'? Surely they should, since the competences acquired abroad (cultural, educational, linguistic) will not replicate those acquired at home. But what of a foreign module studied at home? Where does the added value lie? Unless it can be specified, quantified, and credited, the concept of virtual learning mobility will lack credibility.

54. Were such an accounting methodology to be developed, it would need to be deployable in the recognition of prior learning (RPL), thereby raising the possibility of on-course exemptions from mobility requirements. This is feasible, quality assurance permitting. What is more problematic is self-blended concurrent learning. It can, in theory, be recognised and credited if it takes the form of a micro-credential or a MOOC, but a great deal of self-managed study – typically fragmentary and spontaneous – can derive from foreign sources and function as an unmonitored blending agent. Technically, it is accountable only with difficulty.

Factors of disruption

55. On the face of it, the 20% benchmark is unachievable unless (1) UOE and Eurostat soften their insistence on physical mobility, and (2) a new definition of mobility emerges, supported by a workable set of metrics and by an overwhelming consensus of European higher education stakeholders. Until recently, this might have seemed beyond the bounds of possibility. However, in the last three years, the situation has changed dramatically to the point at which a new academic world (hopefully, a brave one) is visible. It is worth pausing to survey the factors of disruption; they give a sense of just how much has changed since 2020 – the date at which the benchmark was to have been reached. In the case of virtual learning and its deployment as a surrogate for physical mobility, the time lapse between institutional policy change and implementation was brief. But the mature consequences of the state of academic emergency remain to be seen. Will the contingency measures be absorbed as permanent features of the higher education landscape?

56. Consideration of mobility data for the period 2020-2023 will inevitably reveal significant departures from the expected curve. There have been three major disruptors: the Covid-19 pandemic, Brexit, and the war in Ukraine. How precisely they reinforced each other is hard to determine, but their cumulative impact has been significant. The pandemic had a qualitative impact on student mobility, notably due to the severe restrictions imposed on travel and on social contact. It unquestionably accelerated Europe's digital transition. In the case of virtual learning and its deployment as a surrogate for physical attendance as well as for physical mobility, the time lapse between institutional policy change and implementation was brief. But the mature consequences of the state of academic emergency remain to be seen. Will the contingency measures be absorbed as permanent features of the higher education landscape? A survey conducted by EUA in the framework of the DIGI-HE project mentioned above showed that in 2020 25% of 368 respondent institutions across the EHEA had made provision for virtual mobility, either institution-wide or at faculty level. A further 35% were actively planning to introduce it. In 2021, EUA – having consulted 26 national rectors' conferences – noted that "very often, there is no system-wide approach, and the mode of teaching is handled differently by the institutions in the respective systems". One year later, Universities UK International found that, of 59 institutional respondents to its national survey, nearly two thirds had made a significant shift to virtual learning, but 21% of these had no plans to maintain the arrangements. The overall picture has yet to settle.

57. By the time the Bologna ministers meet in Tirana in 2024, it may be possible to assess the effects of Brexit on student mobility. Although the UK remains in the EHEA, its departure from the EU has taken a population of 68 million out of the EU regime of freedom of movement – that is to say, out of the European labour market. Brexit is also likely to have depleted Erasmus+ numbers, since the UK prior to its withdrawal was one of the major host countries. In the course of the current year, 2023, the residual UK activities in the Erasmus+ 2014-2021 programme will come to an end. Henceforth, UK institutions and citizens can participate only in a limited number of programmes, in line with the rules applying to non-associated third countries, as well as excluding any activities which draw on funding from the EU's External Action Service.

58. Between 2020, the final year of EU membership and the first of the pandemic, and 2021, the first year of Brexit, the UK's inward degree mobility from the EU dropped from 66,680 to 31,000, a fall of 53.3%[18]. In Erasmus+, outward mobility from the UK fell from 18,113 to 10,172 (-43.8%) between 2019 and 2022; inward mobility declined from 30,497 to 12,147 (-60.2%). Meanwhile, the UK government has launched the Turing Scheme, which it promotes as a 'genuinely global' mobility framework. Now in its second year, Turing data can in theory feature in future overviews of EHEA mobility, but in what volume can now only be speculated. The programme does not support incoming students and is therefore not an exchange programme. In 2021-22, in a further decline from the Erasmus+ years, only 6,987 Turing-funded students were mobile to European destinations. Whether physical mobility in and out of the UK will grow at the speed required and desired by the UK higher education sector is impossible to predict. The UK's contribution to EHEA mobility volumes – and to the achievement of the 20% benchmark – is bound to remain uncertain for some time to come. Ongoing developments compound the uncertainty: the

18 https://www.theguardian.com/education/2023/jan/27/number-eu-students-enrolling-uk-universities-down-half-since-brexit

devolved administration in Wales has launched its own Erasmus-replacement scheme, Taith; Scotland is considering a similar measure; students from Northern Ireland have been given access to universities in Ireland, while a growing number of Irish students are opting – for financial reasons – to study in Northern Ireland.

59. The most recent disruption has been the invasion of Ukraine. The United Nations High Commissioner for Refugees (UNHCR) data portal reported that by 28 March 2023 just over eight million refugees from Ukraine had reached other countries in Europe and that just over five million had been registered for some form of temporary protection. Prior to the Russian invasion there had been just under one million students in Ukrainian higher education. The mass exodus included students, both Ukrainian and foreign (notably African and South Asian), as well as secondary school students of an age to access higher education. (Whether male Ukrainian university students were allowed to exit Ukraine was a matter for local border guards to decide, based on their appreciation of the documents presented.) Ukrainian authorities have reported that 1.4 million citizens have been deported to Russia; how many of these are students is unknown. This represents a forced mobility flow of significant size, although not necessarily into higher education institutions. Some displaced persons may already, or may in the future, be contemplating return. Accurate numbers are impossible to ascertain. Suffice it to say that pan-European mobility numbers for academic years 21/22 and 22/23 are likely to be substantially distorted, particularly as Russian citizens emigrating to the rest of Europe significantly inflate the figures.

60. The *force majeure* embodied by Covid-19 has been replaced by that of climate change. Europe's cost-of-living crisis has meant that the shift to green travel is financially problematic for students and funding bodies, given the comparative prices of rail and budget airlines. The volume of virtual mobility is therefore likely to retain its current momentum, that is to say, rising in a manner which cannot with confidence be said to be short-term. Indeed, a survey by EUA of responses to the challenges of 'greening' revealed that 51% of 390 institutions are making long-term plans to further explore virtual student mobility. 25% already have it in place as standard or compulsory practice.

Looking to the future - expanding physical mobility

61. The European Commission's Communication on a European strategy for universities, published in January 2022, maintains its determination to increase the volume of student mobility. Long-standing Erasmus+ operations are intended to continue on their path of incremental growth. The strategy spotlights other initiatives to boost both actual mobility and the management of mobility: in addition to the EUI, there is the European Student Card, and a projected European Quality Assurance and Recognition System to be aligned with the policies and practices of the EEA[19]. The Commission hopes that the strong focus on automatic recognition will help drive degree mobility. Beyond its intra-European initiatives, it emphasises the role to be played by student and staff mobility in EU-funded international development and capacity-building programmes.

62. The Communication makes no mention of the Bologna and EU mobility benchmark. However, in a move that might eventually to an explicit position, it proposes the setting up of European Higher Education Sector Observatory, one of the deliverables of which will be a Scoreboard "to yearly assess the progress made across the EU towards the key priorities of this strategy: inclusion, values, quality and relevance, mobility, green and digital skills, employability, transnational cooperation, technology transfer and knowledge valorisation." The Scoreboard is intended to accommodate and aggregate the work of all the relevant statistical sources currently up-and-running. Its annual reports will presumably be able to track the curve of proximity to the 20% benchmark, as well as generating data to inform strategic thinking about the benchmark's definition and metrics.

19 The European Education Area, which encompasses early years, primary, secondary, and higher education. Not to be confused with the European Economic Area, mentioned in paragraphs 12 and 31 above.

63. There are several ways of boosting physical mobility. The Commission is right to point to the recognition of student attainment and qualifications, as well as to cross-border quality assurance and to collaborative course design with built-in mobility windows. Other factors have been explored in depth over the years: the portability of funding and the obligation to facilitate mobility opportunities for disadvantaged, vulnerable and under-represented groups. As suggested earlier in this briefing, there is also scope for easing the constraints imposed by EU legislation on professional qualifications, notably with a view to expanding the opportunities for cross-border traineeships.

Looking to the future - re-engineering the benchmark

64. We have stressed the importance of examining whether and how the benchmark should be redefined. This necessarily entails addressing the possibility of going beyond the boundaries of countable mobility set by UOE and Eurostat. Whether this would be regarded as a liberalisation, a watering-down, or simply a matter of keeping up with the changing times is not really pertinent. The reality is that the higher education sector has reached a choice point. Putting it bluntly: either it abandons the unattainable 20% benchmark or it radically expands its catchment. One possibility mentioned already is to bring into the reckoning students on branch campuses and foreign franchises. Effectively, this would mean counting immobile students who are on course in mobile universities and programmes. The suggestion elicits some scepticism. Studying at a Greek liberal arts college operating under a UK franchise does not give a strong sense of what it means to study in London. On the other hand, closer consideration might grant that the students could count as a decimal of a whole mobile student – at what point between 0.1 and 0.9 depending on such factors as the nationality of the teaching staff, the language of delivery, and the degree of 'foreign'/international content in the curriculum. After all, such students have either been denied access to, or have voluntarily stepped outside, their nationally funded HE systems. While still studying in their home country, they are not intellectually immobile.

65. Another possible approach – at first sight presentational – is to apply the benchmark discretely to each of the Bologna cycles rather than regarding it as all-encompassing. This has the advantage of shining a positive light on mobility at master's and doctoral levels, which, as the Bologna Implementation Report of 2020 showed, stood at 16.1% and 17.3% respectively. At those levels, it can be conjectured, the 20% benchmark is achievable. Inevitably, however, the exercise leaves the low rate of mobility at Bachelor level as reported in the Implementation Report (9.6%) cruelly exposed.

66. It also suggests an avenue of research worth exploring: the distribution of cross-border mobility volumes between first, second and third cycles within binary systems and between binary and unitary systems. Degree mobility falls a long way short of seamless if obstacles exist which inhibit progression from bachelor's to master's across binary boundaries. Eurostudent has data on the time-lapse of progression from bachelor's to master's, but is not sensitive to the academic/professional bachelor's distinction and in any case does not track the relation between progression and degree mobility. It would be interesting to investigate how far degree mobility is supported by cross-border and cross-sub-sectoral *passerelles* and to log the data in the future Scoreboard. The pan-European context is complex and the mapping would doubtless require a substantial resource of time and labour.

67. There are issues regarding the 'social dimension' at stake here. Erasmus+ prioritises 'students with fewer opportunities', but these are generally identified by participant institutions from within particular cohorts in particular cycles. Students with fewer opportunities to progress between cycles are less readily identifiable. If cross-border trans-binary progression routes were available in a greater number of systems, thus facilitating a greater volume of physical degree mobility, then the 9.6% bachelor's mobility rate would be easier to raise.

68. Turning to credit mobility and its contribution to the 20% benchmark, the focus falls on ECTS. The Bologna Process Peer Learning Group A on Qualification Frameworks decided to consider the full implementation of the *ECTS Users' Guide* in its schedule of meetings between 2018 and 2020. It subsequently posted

an agenda. This included: ECTS experts, presumably national, and a reinforcement of the links between ECTS, qualifications frameworks, and quality assurance. A follow-up peer learning activity on the "Implementation of Qualification Frameworks and ECTS – Focus on Learning Outcomes" took place in Vienna in May of this year; the report is not yet available.

69. The *ECTS Users' Guide* would appear to be one of the best means of renewing sectoral consensus in the changed circumstance of the mid-2020s and of expressing it as a set of principles and guidelines. A fourth edition has not been publicly announced. The timeframe is therefore long. For the multi-stakeholder editorial group – should the Commission choose to appoint one – the challenge would be substantial. Its most pressing problem would be to accommodate, as modes of mobility, the virtual and the blended. It would have to map the range of practices of blended mobility in current use, identify good practice, standardise the terminology, enshrine a set of metrics, and propose an operational architecture which would give clear guidance on how to manage the ECTS tariff.

70. It could not avoid the key question: how to calibrate mobility which is virtual? Can cross-border engagement in virtual learning be legitimately and convincingly regarded as a mode of mobility? No doubt it can attract credit – credit which can be accumulated – but in what measure can the credit be transferred? The question is urgent. One may assume that given environmental concerns, funding shortfalls, the cost-of-living difficulties which inhibit the physical mobility of the less well off, and the need to have a viable fall-back option in cases where physical mobility is simply not possible, there will be a push for the acceptance of 'virtual only', either as a mode of mobility or at least as an "international student experience". This should be the object of extensive debate. If virtual exchanges and blended mobility are to have sufficient credibility to be reckonable with the benchmark, they will have to be backed by a strong consensus within and beyond the higher education sector. The evident risk is the creation of two classes of mobile students, the 'authentically' mobile and the 'alternatively' mobile. If the latter maps even approximately on to the category of students 'with fewer opportunities', the challenge will be greater still.

71. Finally, an important question for policy makers and sectoral stakeholders is whether to set a discrete bachelor's mobility benchmark of 20% and to focus substantial efforts on it accordingly – or to subsume it in the three-cycle total. The answer appears at first sight obvious. Only the maintenance of a discrete bachelor's benchmark would offer the greater number of students the benefit of the desired educational and cultural outcomes: a sense of European identity and citizenship; fluency in a foreign language; a wider range of soft competences; and competitive advantage in European labour market(s). It would also maintain the focus on the obstacles that still hamper mobility, including insufficient implementation of the Bologna Process reforms and instruments. Setting an undifferentiated benchmark, on the other hand, risks reinforcing the perception that mobility is the province of an academic elite, those who – intellectually and financially – can afford to delay their mobility until the second or third cycle. A pragmatic solution may therefore be to lower the bachelor's benchmark while at the same time putting measures in place to increase the cross-border trans-binary progression rates from first to second cycle. The benchmarks for master's and doctorates could be uprated accordingly.

Proposed points for debate

The **way forward** should be twin-track:

- to continue to improve policy and practice on internationalisation, inclusion, recognition, HEI partnerships, portability of funding, data collection and data consistency, etc.;
- and to explore possibilities of expanding the definition of mobility as far as is credible.

This briefing asks for the consideration of all stakeholders, irrespective of their legal or regulatory competences. It intends to stimulate debate and to contribute to consensus-building.

Framing all the suggested discussion points is the need to consider lifting the UOE and Eurostat restrictions on the admissibility of branch campuses and distance learning as modes of international mobility.

To enlarge the pool of physically mobile students:

A. Cross-border traineeships undertaken outside Erasmus+ in the framework of university-industry collaboration, whether in the context of bilateral or formal trade agreements, should be included in the mobility statistics.

B. In the legal framework of the EU's internal market, obstacles to cross-border trainee mobility should be identified and removed.

C. Consideration should be given to whether and how students in branch campuses and on franchised programmes can be regarded as mobile.

D. As a complement to the existing strong focus on inclusivity, and in view of the high incidence of physical mobility at master's and doctoral levels, efforts should be made to expand cross-border inter-cycle progression routes across binary divides.

E. Mobilities achieved in non-formal and informal prior learning (RPL-NFIL) should be recognised and counted into the benchmark.

To re-engineer the 20% benchmark:

F. Given the urgency of the digital and green transitions, physical mobility needs to be blended with virtual mobility in ways which assure high quality and amenability to measurement.

G. Wide-ranging debate should be initiated in order to develop a credible, widely accepted and sensitive set of metrics on internationalisation in general and on blended and virtual learning in particular.

H. The Scoreboard which the Commission proposes to locate within the European Higher Education Sector Observatory should use the refined metrics to institute a new series of longitudinal data.

I. In order for refined metrics to be deployed in evolving digital mobility and recognition instruments, a fourth edition of the *ECTS Users' Guide* should promulgate precise guidelines and generate good practice.

J. Consideration should be given to breaking the overall 20% benchmark down into cycle-based components, with the Bachelor benchmark re-set at an appropriate level and the master's and doctoral benchmarks adjusted accordingly.

Post-script

The European Commission has recently run a public consultation on *Learning opportunities (learning mobility) abroad in Europe for everyone*. It closed on 3 May. It is intended to assist policy makers to:

- identify barriers to learning mobility;
- provide guidance on overcoming them;
- promote learning mobility and identify possible incentives;
- make learning mobility more socially inclusive and environmentally friendly and link it more to digital learning opportunities.

At the same time, the Commission contracted PPMI, a research and policy analysis centre, to conduct a background study on learning mobility. "The study will be carried out within the context of the European Commission's plan to adopt a proposal for a Council Recommendation on the new learning mobility framework. The new Recommendation will aim to install learning mobility as a norm rather as an exception for all learners and staff in all education and training sectors, youth, and sport. The main objective of the study is to map and analyse available data on the progress and the incentives as well as the reasons why learners do not move and the obstacles to learning mobility in the EU in all learning settings, provide the Commission with a solid basis of knowledge and analysis and propose concrete recommendations for the revised learning mobility framework, in order to overcome the bottlenecks and to boost learning mobility, both within and beyond the EU programmes."

The consultation report and the study have not yet been published.

EUROPEAN UNIVERSITY ASSOCIATION

The European University Association (EUA) is the representative organisation of universities and national rectors' conferences in 48 European countries. EUA plays a crucial role in the Bologna Process and in influencing EU policies on higher education, research and innovation. Thanks to its interaction with a range of other European and international organisations, EUA ensures that the voice of European universities is heard wherever decisions are being taken that will impact their activities.

The Association provides unique expertise in higher education and research as well as a forum for exchange of ideas and good practice among universities. The results of EUA's work are made available to members and stakeholders through conferences, seminars, websites and publications.

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