

European Higher Education Area (EHEA): Policy Developments and Trends

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Introduction

Daniela Cristina GHIȚULICĂ,
Director General of ARACIS and President of ENQA

Fifteen years after the launch of the European Higher Education Area (EHEA), and twenty-seven years after the initiation of the Bologna Process, European higher education continues to be shaped by processes of transformation involving policy development, national-level steering, institutional leadership and implementation in areas such as quality assurance, the recognition of qualifications and qualifications frameworks, as well as mobility, internationalisation, the social dimension and fundamental values. The EHEA has progressively become a key framework for the transformation of higher education systems in Europe, enabling them to respond to regional and global challenges while maintaining a distinctive model based on cooperation, mutual trust and shared values.

Knowledge sharing regarding Bologna Process key commitments, policy areas, achievements and challenges has become central to effective implementation. This issue of *Universitas*, devoted to EHEA: policy developments and trends, brings together valuable contributions from renowned experts that examine the historical, legal, institutional and socio-political dimensions of these transformations. The articles address several of the core themes identified in the call for papers, including the three pillars of the EHEA – recognition, quality assurance and qualification frameworks – as well as transnational education, digital transformation and artificial intelligence, academic freedom, institutional autonomy, mobility and the broader European dimension of higher education.

A first group of contributions focuses on the governance and institutional architecture of the European Higher Education Area. The analysis of the Bologna Process highlights how the EHEA has developed as a structured system of coordination despite the absence of binding legal instruments. Through ministerial communiqués, the Bologna Follow-Up Group (BFUG) steering, working groups and iterative follow-up mechanisms, the Bologna Process has generated a stable form of policy cooperation. This perspective makes it possible to understand the EHEA not only as a political project, but also as a soft governance space in which structured procedures and follow-up, expertise and institutional practice sharing play a central role. Closely connected to this is the reflection on the European dimension of higher education. The contributions show that this dimension is not limited to the action of the European Union and should be understood through the interaction between EU policies and the Bologna Process commitments and tools. Mobility, recognition, quality culture, fundamental values and the social dimension emerge as policy domains through which a shared European approach to higher education has been progressively constructed.

A second thematic area concerns recognition of qualifications and academic mobility. The historical reconstruction of the birth of the National Academic Recognition Information Centres in the European Union (NARIC) network shows how recognition became a strategic issue for European cooperation from the 1970s and 1980s onwards. Recognition was understood as a necessary condition for making mobility effective, supporting university cooperation and facilitating the free movement of persons. The

evolution of recognition policies thus reveals the importance of information and cooperation networks, professional expertise and mutual trust in the construction of the European higher education space. This trajectory is further developed in the contribution devoted to automatic recognition and digital transformation. While digital tools may support more transparent, effective and consistent recognition procedures, the article stresses the need to distinguish automatic recognition from full technological automation. The use of digital systems and artificial intelligence in recognition processes must remain consistent with the principles of human oversight, accountability, transparency, data quality and human-centred evaluation.

Quality assurance is another central theme of this issue. The contribution examines how the European quality assurance framework may respond to emerging challenges such as sustainability, artificial intelligence, resilience and institutional transformation. It also explores the author's proposal that selected elements of Total Quality Management and Business Excellence Models could complement existing arrangements. Within the EHEA, however, the European Standards and Guidelines (ESGs) remain the commonly agreed framework for internal and external quality assurance, grounded in institutional responsibility, continuous enhancement, stakeholder participation and respect for institutional diversity and autonomy.

The issue also addresses Transnational Education (TNE) as a structural dimension of the internationalisation of higher education. TNE raises complex questions concerning governance, regulation, student protection, quality assurance and accreditation, and recognition of qualifications. By examining the Italian case and selected comparative models, the contribution highlights both the opportunities and the challenges associated with transnational forms of higher education provision. Digital transformation and artificial intelligence (AI) are also examined from the perspective of university governance and regulatory responsibility. The adoption of AI systems in academic contexts raises significant legal and institutional questions, particularly regarding compliance with the EU Artificial Intelligence Act, data protection rules and the safeguards required to protect fundamental rights, access to knowledge and academic freedom. Universities may assume different responsibilities depending on whether they simply use AI systems developed by external providers or develop and deploy their own systems. In this sense, AI is not merely a technological tool, but a factor capable of reshaping the organisational and regulatory infrastructures through which knowledge is produced, managed and disseminated.

Finally, attention is devoted to the fundamental values of higher education, with a comparative analysis of institutional autonomy and academic freedom in post-Soviet countries. The article shows that the formal recognition of these principles does not automatically ensure their effective implementation in practice. Their protection depends on the interaction between legal frameworks, which are a key enabling factor, governance models, institutional cultures and awareness.

Taken together, the articles collected in this issue show that the EHEA remains a dynamic and evolving policy space. Its development cannot be understood through a single lens, as it remains a complex framework, often difficult to navigate beyond the BFUG bubble.

By bringing together different perspectives, related both to its key commitments, but also to policy

areas as the fundamental values and internationalisation and the transversal topic of digitalisation, and even the hot topic of artificial intelligence, this issue of *Universitas* brings an important contribution to the debate on the future of European higher education and on the role of the EHEA in shaping policy developments and institutional practices in Europe and beyond, even more relevant now, less than one year ahead of the Iasi and Chisinau Ministerial Conference.

Daniela Cristina GHIȚULICĂ
Director General of ARACIS and President of ENQA

Intelligenza artificiale, compliance e assetti della governance nelle Università italiane

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<https://doi.org/10.65158/OVFO2663>

| Abstract (IT)

Dopo aver ricostruito il ruolo del diritto internazionale dei diritti umani anche nella definizione dei limiti giuridici all'utilizzo di sistemi algoritmici nei contesti educativi, il presente contributo delinea il quadro normativo rilevante relativo alla regolazione dell'intelligenza artificiale nella governance accademica e formula alcune osservazioni sulle possibili integrazioni dei relativi assetti e sulla compliance. In quest'ottica, l'obiettivo del presente lavoro consiste nell'analizzare l'impatto dell'intelligenza artificiale sui modelli organizzativi dei sistemi di formazione superiore e verificare in quale misura l'adozione dell'intelligenza artificiale in tali sistemi possa contribuire a modulare le infrastrutture istituzionali attraverso cui la conoscenza viene organizzata e diffusa.

Parole chiave: Intelligenza Artificiale, Diritti Umani, AI Act, Università, Governance, Compliance.

| Abstract (EN)

After reconstructing the role of international human rights law, including in defining the legal limits on the use of algorithmic systems in educational contexts, this paper outlines the relevant regulatory framework for the regulation of artificial intelligence in academic governance and offers some observations on possible integrations of the relevant structures and on compliance. From this perspective, the aim of this paper is to analyze the impact of artificial intelligence on the organizational models of higher education systems and to assess the extent to which the adoption of artificial intelligence in such systems can contribute to shaping the institutional infrastructures through which knowledge is organized and disseminated.

Keywords: Artificial Intelligence, Human Rights, AI Act, University, Governance, Compliance.

1. Introduzione

In che misura l'attuale quadro normativo – internazionale, europeo e interno – è in grado di regolare l'utilizzo dell'intelligenza artificiale¹ nella *governance* dei sistemi di formazione superiore, senza intaccare diritti fondamentali quali il diritto allo studio, l'accesso equo alla conoscenza e la libertà accademica? E quali sono, alla luce di tali norme, gli adempimenti di compliance che una istituzione accademica deve porre in essere?

Prima di procedere oltre, preme puntualizzare come il presente lavoro si concentri prevalentemente sul quadro normativo dell'Unione europea e sulle sue implicazioni per la *governance* e la *compliance* delle istituzioni universitarie italiane. Tale delimitazione metodologica non esclude, tuttavia, il rilievo di ulteriori livelli di regolazione – in particolare quelli elaborati dal Consiglio d'Europa e dall'UNESCO – che verranno richiamati nei loro tratti essenziali al fine di circoscrivere il perimetro dell'analisi e chiarirne l'impostazione. In questo senso, il contributo si colloca consapevolmente all'interno di una prospettiva multilivello della regolazione dell'intelligenza artificiale.

L'adozione del Regolamento (UE) 2024/1689 sull'intelligenza artificiale rappresenta il tentativo più ambizioso di costruire un quadro normativo organico capace di governare lo sviluppo e l'utilizzo dei sistemi di intelligenza artificiale attraverso un approccio fondato sulla gestione dei rischi e sulla tutela dei diritti fondamentali.

Tuttavia, sebbene il Regolamento abbia suscitato un ampio dibattito dottrinale e istituzionale, l'attenzione si è concentrata prevalentemente su ambiti quali la sicurezza e la protezione dei dati personali, in particolare nei settori bancario-finanziario², societario (*corporate governance*)³ e

¹ Con il termine intelligenza artificiale (IA o, in inglese, AI) si fa riferimento all'insieme di tecnologie e metodi volti a sviluppare sistemi informatici capaci di eseguire attività che, in condizioni ordinarie, richiederebbero capacità cognitive umane, come l'interpretazione di immagini, l'elaborazione del linguaggio naturale o la definizione di strategie. Il *machine learning* (ML) costituisce uno dei metodi attraverso cui tali obiettivi vengono perseguiti. Esso indica un settore specifico dell'IA fondato sull'idea che i sistemi possano migliorare le proprie prestazioni analizzando grandi quantità di dati, individuando autonomamente schemi e relazioni senza che ogni singola operazione debba essere programmata in modo esplicito. Le tecniche di *machine learning* vengono comunemente suddivise in alcune tipologie fondamentali di apprendimento automatico. Una prima modalità è l'apprendimento supervisionato, nel quale il sistema viene addestrato mediante un insieme di dati già etichettati, così da apprendere la corrispondenza tra input e risultato corretto. Diversamente, nell'apprendimento non supervisionato l'algoritmo opera su dati privi di classificazione preliminare e ha il compito di individuare autonomamente strutture ricorrenti, gruppi o correlazioni presenti nelle informazioni disponibili. Un ulteriore modello è rappresentato dall'apprendimento per rinforzo, basato su un processo iterativo di prova ed errore in cui il sistema modifica il proprio comportamento in funzione delle ricompense o penalità ricevute. Infine, tra gli strumenti utilizzati rientrano anche gli alberi decisionali, modelli tipicamente associati all'apprendimento supervisionato che rappresentano il processo decisionale attraverso una struttura gerarchica ad albero: ciascun nodo corrisponde alla verifica di una variabile, ogni ramo indica l'esito possibile di tale verifica e il percorso conduce progressivamente fino ai nodi terminali, detti foglie, che esprimono la classificazione conclusiva. In tema, si vedano su tutti Barone, G., *Machine learning e intelligenza artificiale - Metodologie per lo sviluppo di sistemi automatici*, Palermo, 2021, pp. 15 sg.; Marmo, R., *Algoritmi per l'intelligenza artificiale*, Milano, 2021, pp. 133 sg.

² Ammannati, L., Greco, G.L., *Piattaforme digitali, algoritmi e big data: il caso del credit scoring*, "Rivista Trimestrale di Diritto dell'Economia", n. 3, 2021, pp. 290 sg. Ammannati, L., Greco, G.L., *Il credit scoring "intelligente": esperienza, rischi e nuove regole*, "Rivista di Diritto bancario", n. 3, sezione I, 2023, p. 261. Bagni, F., *Uso degli algoritmi nel mercato del credito: dimensione nazionale ed europea*, "Osservatorio sulle fonti", n. 2, 2021, pp. 909 sg. Barresi, D., *Il rating ESG delle società di capitali*, "Rivista di Diritto Societario", n. 4, 2024, pp. 231 sg. Bonelli, C., *Governance bancaria e controlli interni*, "Rivista di Diritto Bancario", n. 5, 2021, pp. 202 sg. Gambino, A., Scorza, G., Stazi, A. (a cura di), *Il diritto della tecnofinanza (fintech)*, Giappichelli, 2018; Milli, C., *L'uso dell'Intelligenza Artificiale nella previsione del rischio di dissesto bancario. Nuove prospettive di indagine*, "Rivista di Diritto Bancario", n. 7, 2024, pp. 231 sg.

³ Cerrato, S., Culasso, F., Crocco, E., *"Handle with care". Per una governance dell'intelligenza artificiale: rischi, tecniche di gestione, assetti cibernetici*, "Rivista delle società", nn. 2-3, 2023, pp. 371 sg. Denozza, F., *ESG, investitori istituzionali e diritto societario*, "Rivista delle società", n. 2, 2022, pp. 31 sg.; Lucchini Guastalla, E., *ESG e doveri degli amministratori*, "Rivista delle società", n. 3, 2021, pp. 112 sg.; Marchetti, B., *La regolazione europea del mercato dell'intelligenza artificiale*, "Rivista della Regolazione dei Mercati", n. 1, 2024, pp. 3-9; Montalenti, P., *Società, mercati finanziari e fattori ESG: ultimi sviluppi*, "Rivista Corporate Governance", n. 2, 2025, pp. 9 sg.

dell'industria agro-alimentare⁴.

Non risultano invece adeguatamente esplorate le implicazioni dell'intelligenza artificiale per la *governance* e la *compliance* delle istituzioni accademiche. Eppure, la progressiva digitalizzazione dei processi e l'adozione crescente di tecnologie algoritmiche stanno trasformando profondamente le modalità attraverso le quali la funzione di produzione e diffusione della conoscenza scientifica delle Università - oggi sempre più mediata da infrastrutture digitali, piattaforme tecnologiche e sistemi di analisi automatizzata dei dati - viene esercitata.

In questo ambito assume particolare rilievo il ruolo delle Università digitali: a differenza delle istituzioni accademiche tradizionali, queste istituzioni sono state concepite e sviluppate fin dall'origine all'interno di un ambiente tecnologico digitalizzato. I loro modelli organizzativi, didattici e amministrativi possono fondarsi su infrastrutture di supporto all'intero processo educativo: dalle piattaforme di apprendimento *online* alla gestione dei dati accademici, fino agli strumenti di analisi delle attività didattiche. L'integrazione dell'intelligenza artificiale in tali contesti non rappresenta solo l'introduzione di una nuova tecnologia all'interno di istituzioni esistenti, bensì può essere interpretata come un'evoluzione ulteriore di modelli accademici già strutturalmente digitalizzati.

Tale evoluzione pone problemi giuridici di non poco momento.

Anzitutto, quelli derivanti dal fatto che l'utilizzo di sistemi algoritmici nei processi educativi può incidere su una serie di diritti fondamentali riconosciuti dal diritto interno e internazionale, quali il diritto all'istruzione, l'accesso alla conoscenza, la libertà accademica e l'autonomia delle istituzioni universitarie, principi consolidati nella tradizione giuridica occidentale. L'introduzione di sistemi di intelligenza artificiale nei processi accademici può condizionare tali principi in modi diversi: da un lato, le tecnologie digitali possono contribuire ad ampliare l'accesso alla formazione superiore, facilitando la diffusione della conoscenza e rendendo possibili nuove forme di apprendimento a distanza; dall'altro, l'utilizzo di sistemi di intelligenza artificiale nella gestione delle attività accademiche solleva questioni relative alla trasparenza delle decisioni automatizzate, alla responsabilità istituzionale e al rischio di discriminazioni c.d. "algoritmiche".

Alla luce di queste considerazioni, l'analisi delle implicazioni giuridiche dell'intelligenza artificiale per la *governance* delle Università assume una rilevanza che va oltre il singolo settore della formazione superiore e si inserisce nel più ampio dibattito sulla governance della conoscenza nell'era delle tecnologie digitali.

⁴Battelli, E., *Innovazione tecnologica e gestione della filiera agroalimentare*, "Rivista di diritto agrario", n. 3, 2024, pp. 455 sg. Borghi, P., *L'agricoltura 4.0. Il futuro del settore agroalimentare e il filo rosso che lo lega alle origini della PAC*, "Rivista di diritto alimentare", Quaderno n. 1, 2023, pp. 5-10. Canfora, I., *Politica Agricola Comune e digitalizzazione del comparto agroalimentare*, "Rivista di diritto alimentare", Quaderno n. 1, 2023, pp. 11-19; D'Addezio, M., *Sostenibilità e responsabilità nel settore agricolo e nelle filiere produttive intersettoriali*, "Rivista di diritto agrario", n. 3, 2025, pp. 40 sg. Pisciotta Tosini, G. (a cura di), *La rilevanza della digitalizzazione per un mercato agroalimentare sostenibile*, Palermo University Press, 2023.

2. Intelligenza artificiale e diritto all'istruzione, accesso alla conoscenza, libertà accademica

La regolazione dell'intelligenza artificiale nei sistemi educativi deve essere anzitutto collocata nel quadro dei diritti umani, che riconosce l'istruzione come uno dei diritti fondamentali della persona e attribuisce agli Stati obblighi specifici in relazione alla sua tutela e promozione⁵.

Il principale riferimento normativo è rappresentato dall'art. 26 della Dichiarazione universale dei diritti dell'uomo del 1948⁶, il quale riconosce il diritto di ogni individuo all'istruzione e stabilisce che la formazione superiore deve essere accessibile a tutti sulla base del merito:

Ogni individuo ha diritto all'istruzione [...] L'istruzione deve essere indirizzata al pieno sviluppo della personalità umana ed al rafforzamento del rispetto dei diritti umani e delle libertà fondamentali. Essa deve promuovere la comprensione, la tolleranza, l'amicizia fra tutte le Nazioni, i gruppi razziali e religiosi [...]⁷

Questo principio è stato successivamente sviluppato dall'art. 13 del Patto internazionale sui diritti economici, sociali e culturali del 1966 (*International Covenant on Economic, Social and Cultural Rights* o ICESCR), che impone agli Stati l'obbligo di rendere la formazione superiore progressivamente accessibile a tutti mediante ogni mezzo appropriato⁸.

In ambito europeo, il diritto all'istruzione trova inoltre riconoscimento nell'art. 2 del Protocollo addizionale alla Convenzione europea dei diritti dell'uomo⁹ (CEDU)¹⁰, mentre a livello dell'Unione esso è ribadito

⁵ Floridi, L., Cowls, J., *A unified framework of five principles for AI in society*, "Harvard Data Science Review", n. 1, 2019, pp. 1-15. <https://doi.org/10.1162/99608f92.8cd550d1>. Mantelero, A., *Artificial intelligence and data protection: challenges for fundamental rights*, "Computer Law & Security Review", n. 34, 2018, pp. 643-654.

⁶ La Dichiarazione universale dei diritti dell'uomo rappresenta il fondamento del moderno sistema internazionale di tutela dei diritti umani. Sulla Dichiarazione, si rinvia a: Tomuschat, C., *Human Rights: Between Idealism and Realism*, Oxford University Press, Oxford, 2014, pp. 35-42. Henkin, L., *The Age of Rights*, Columbia University Press, New York, 1990, pp. 19-27.

⁷ Tomasevski, K., *Human rights obligations in education: the 4-A scheme*, "Right to Education Primers", n. 3, 2001, pp. 1-46.

⁸ Come la Dichiarazione universale dei diritti dell'uomo, il Patto internazionale sui diritti economici, sociali e culturali costituisce uno dei principali strumenti del diritto internazionale dei diritti umani e, insieme al Patto sui diritti civili e politici, forma l'ossatura della cosiddetta *International Bill of Human Rights*. Sul Patto, si consultino: Craven, M., *The International Covenant on Economic, Social and Cultural Rights: A Perspective on its Development*, Oxford University Press, Oxford, 1995, pp. 289-310. Saul, B., Kinley, D., Mowbray, J., *The International Covenant on Economic, Social and Cultural Rights: Commentary, Cases and Materials*, Oxford University Press, Oxford, 2014, pp. 1060-1085. Alston, P., Quinn, G., *The Nature and Scope of States Parties' Obligations under the International Covenant on Economic, Social and Cultural Rights*, "Human Rights Quarterly", n. 9, 1987, pp. 156-229.

⁹ Guida all'articolo 2 del Protocollo n. 1 alla Convenzione europea dei diritti dell'uomo aggiornata al 31 agosto 2019, in https://www.giustizia.it/cmsresources/cms/documents/guida_cedu_articolo2_protocollo1.pdf [ultimo accesso: 5 marzo 2026].

¹⁰ La Convenzione europea per la salvaguardia dei diritti dell'uomo e delle libertà fondamentali, siglata a Roma il 4 novembre 1950 dagli allora quattordici Stati membri del Consiglio d'Europa (e successivamente estesa anche a Paesi extra-UE), riveste, assieme al suo organo giudiziario, ossia la Corte Europea dei diritti dell'uomo, un ruolo fondamentale nella creazione di *standard* giuridici comuni e vincolanti per gli Stati aderenti alla Convenzione stessa. In particolare: «A differenza dei trattati internazionali di tipo classico, la Convenzione va oltre il quadro della semplice reciprocità tra gli stati contraenti. Oltre alla rete di obbligazioni sinallagmatiche bilaterali, essa crea delle obbligazioni oggettive, che beneficiano di una garanzia collettiva» (Corte EDU, sentenza *Mamatkulov c. Turchia* del 4 febbraio 2005). Grazie all'ingresso dell'Unione Europea nella Convenzione, in conformità a quanto prescritto dall'art. 6, par. 2, del Trattato sull'Unione Europea e previsto dall'art. 59 CEDU, la Convenzione possiede il rango di norma comunitaria, con conseguente prevalenza sul diritto nazionale in caso di contrasto. Ciò anche in forza dell'art. 47 della Carta dei diritti fondamentali dell'Unione europea, il quale, secondo la Corte di Giustizia dell'UE (sent. 8 dicembre 2011, in causa C-386/10 P, *Chalkor AE Epexergasias Metallon c. Commissione europea*, punto 5), «... attua nel diritto dell'Unione la tutela sancita dall'art. 6, n. 1, della CEDU». La Convenzione è direttamente applicabile nell'ordinamento degli Stati membri, atteso che, ai sensi dell'art. 6 TUE (Trattato sull'Unione Europea), essa ha il medesimo valore giuridico dei trattati, la cui portata è superiore rispetto a quella di un ordinario trattato internazionale, in quanto proviene da un ordinamento sovranazionale integrato con quello dello Stato membro e costituzionalmente riconosciuto ai sensi dell'art. 11 Cost. La Convenzione diventa, quindi, diritto comunitario e porta con sé tutte le conseguenze derivanti dal principio del primato del diritto dell'UE in termini di efficacia

dall'art. 14 della Carta dei diritti fondamentali dell'Unione europea¹¹; nell'ordinamento italiano trova invece fondamento negli artt. 33 e 34 della Costituzione, che riconoscono rispettivamente la libertà della scienza e dell'insegnamento e il diritto di accesso ai gradi più alti degli studi per i capaci e meritevoli¹².

Accanto al diritto all'istruzione si colloca la libertà accademica, principio fondamentale dell'ordinamento democratico e della funzione sociale dell'Università. Essa è espressamente riconosciuta dall'art. 13 della Carta dei diritti fondamentali dell'Unione europea, secondo cui «*Le arti e la ricerca scientifica sono libere. La libertà accademica è rispettata*», nonché dall'art. 33 della Costituzione italiana, che sancisce la libertà della scienza e dell'insegnamento. La libertà accademica comprende la libertà di ricerca, di insegnamento e di diffusione dei risultati scientifici, e presuppone l'esistenza di un contesto istituzionale che garantisca autonomia e indipendenza della comunità accademica nelle scelte scientifiche e metodologiche¹³.

A tali diritti si collega inoltre il principio dell'accesso alla conoscenza, che emerge in diverse fonti internazionali relative alla scienza e alla formazione superiore. In particolare, la Raccomandazione UNESCO (1997) e la Raccomandazione UNESCO sulla *Open Science* (2021) sottolineano che la conoscenza scientifica rappresenta un bene pubblico globale e che le istituzioni accademiche devono promuovere la più ampia diffusione e accessibilità dei risultati della ricerca. L'accesso alla conoscenza costituisce pertanto una dimensione essenziale del diritto all'istruzione e della libertà accademica, in quanto garantisce che la produzione scientifica possa essere condivisa, verificata e utilizzata dalla comunità scientifica e dalla società nel suo complesso¹⁴.

diretta e di prevalenza sugli ordinamenti nazionali in caso di contrasto, come espressamente statuito dalla Corte Costituzionale, la quale ha riconosciuto alle disposizioni della Convenzione il valore di «*norme interposte*», che integrano il parametro costituzionale di cui all'art. 117, c. 1, Cost. nella parte in cui lo stesso impone la conformazione della legislazione interna ai vincoli derivanti dagli «*obblighi internazionali*». Il riferimento è alle pronunce della Corte Costituzionale italiana nn. 348 e 349 del 24 ottobre 2007. In particolare, nella seconda di tali pronunce la Corte ha precisato in modo chiaro e inequivocabile che al Giudice nazionale «*spetta interpretare la norma interna in modo conforme alla disposizione internazionale, entro i limiti nei quali ciò sia permesso dai testi delle norme. Qualora ciò non sia possibile, ovvero dubiti della compatibilità della norma interna con la disposizione convenzionale interposta, egli deve investire questa Corte della relativa questione di legittimità costituzionale rispetto al parametro dell'articolo 117, primo comma*» (Cfr. Punto 6.2 dei «considerato in diritto» della sentenza n. 349 del 24 ottobre 2007). D'altra parte, già con le sentenze Frontini (Corte di Giustizia, 1973), Simmenthal (Corte di Giustizia, 1978) e Granital (Corte Costituzionale, 1984) era stato affermato il principio del primato del diritto comunitario e della sua efficacia diretta, con la conseguenza che spetta al Giudice nazionale l'applicazione del diritto unionale attraverso un controllo diffuso senza il necessario intervento della Corte Costituzionale e il potere di disapplicazione della norma nazionale contrastante. Quando, però, è la stessa norma dell'Unione a presentare dubbi interpretativi in ordine al suo contenuto o perimetro applicativo, rilevante per la decisione del caso concreto, starà al Giudice nazionale procedere al rinvio pregiudiziale ex art. 267 TFUE, ai sensi del quale la Corte di Giustizia dell'Unione Europea è competente a pronunciarsi in via pregiudiziale non solo sulla «*interpretazione degli atti compiuti dalle istituzioni, dagli organi o dagli organismi dell'Unione*», bensì anche sulla «*interpretazione dei trattati*».

¹¹ La Carta dei diritti fondamentali dell'Unione europea è divenuta giuridicamente vincolante con l'entrata in vigore del Trattato di Lisbona nel 2009, che raccoglie in un unico testo i principali diritti civili, politici, economici e sociali riconosciuti nell'ordinamento dell'Unione. Essa si applica alle istituzioni dell'UE e agli Stati membri quando attuano il diritto dell'Unione, rappresentando il principale parametro di tutela dei diritti fondamentali nel sistema europeo. La Carta rafforza così la dimensione costituzionale dell'ordinamento dell'Unione e il ruolo della Corte di giustizia nella protezione dei diritti. Sulla Carta, si vedano: Craig, P., De Búrca, G., *EU Law: Text, Cases and Materials*, Oxford University Press, Oxford, 2015, pp. 390-410. Lenaerts, K., *The EU Charter of Fundamental Rights: Scope of Application and Interpretation*, "Maastricht Journal of European and Comparative Law", n. 21, 2014, pp. 375-403; De Witte, B., *The EU Charter of Fundamental Rights: The Legal Status and Scope of Application*, "European Law Review", n. 26, 2001, pp. 202-214.

¹² Harris, D., O'Boyle, M., Bates, E., Buckley, C., *Law of the European Convention on Human Rights*, Oxford University Press, Oxford, 2018, pp. 706-720.

¹³ Karan, T., *Academic freedom in Europe: reviewing UNESCO's recommendation*, "Higher Education Policy", n. 22, 2009, pp. 191-215. Barendt, E., *Academic Freedom and the Law: A Comparative Study*, Hart Publishing, Oxford, 2010, pp. 1-25.

¹⁴ Hess, C., Ostrom, E., *Understanding Knowledge as a Commons: From Theory to Practice*, MIT Press, Cambridge (MA), 2007, pp. 3-26.

Sebbene tutte tali disposizioni (fatta eccezione per la Raccomandazione sulla *Open Science*) siano state elaborate in un quadro storico precedente (o di molto antecedente) rispetto alla trasformazione digitale dell'istruzione, esse costituiscono tuttora il quadro giuridico di riferimento entro il quale devono essere valutate le implicazioni dell'utilizzo di sistemi di intelligenza artificiale nei processi educativi¹⁵. L'introduzione dei sistemi algoritmici nei contesti accademici solleva infatti questioni nuove rispetto alla tradizionale interpretazione del diritto all'istruzione. Nello specifico, l'utilizzo di strumenti di analisi dei dati per orientare i percorsi formativi degli studenti, di sistemi automatizzati per la valutazione delle prestazioni accademiche o di piattaforme digitali per la gestione delle attività didattiche può incidere in modo significativo sulle opportunità educative degli individui¹⁶.

Assume crescente rilievo anche l'elaborazione normativa del Consiglio d'Europa in materia di intelligenza artificiale. In particolare, la recente Convenzione quadro sull'intelligenza artificiale, i diritti umani, la democrazia e lo Stato di diritto (2024) rappresenta il primo strumento internazionale giuridicamente vincolante volto a disciplinare in modo organico l'impatto dei sistemi di IA sui diritti fondamentali. Essa introduce obblighi di valutazione preventiva dei rischi e di adozione di misure di mitigazione che risultano rilevanti anche nei contesti educativi e accademici, ove l'utilizzo di sistemi algoritmici può incidere sull'accesso alla formazione superiore e sulla libertà accademica.

Queste preoccupazioni sono state progressivamente riconosciute anche dalle organizzazioni internazionali. In particolare, l'UNESCO ha dedicato crescente attenzione all'impatto delle tecnologie digitali sui sistemi educativi. La Raccomandazione sull'etica dell'intelligenza artificiale adottata nel 2021 sottolinea esplicitamente la necessità di garantire che l'utilizzo dell'intelligenza artificiale nei sistemi educativi sia compatibile con il rispetto dei diritti umani e con la promozione dell'accesso equo alla conoscenza. La Raccomandazione evidenzia inoltre il rischio che l'adozione di tecnologie algoritmiche possa accentuare disuguaglianze già esistenti nei sistemi educativi, qualora tali tecnologie siano sviluppate e implementate senza adeguate garanzie normative e istituzionali.

S'è evidenziato come, accanto al diritto all'istruzione, un ulteriore principio rilevante nel contesto accademico sia rappresentato dalla libertà accademica, che costituisce uno degli elementi fondamentali delle società democratiche. Sebbene non esista una definizione univoca di tale principio nel diritto internazionale, esso è generalmente inteso – a livello dell'Unione europea – come l'insieme delle libertà che garantiscono agli studiosi e alle istituzioni universitarie la possibilità di svolgere attività di ricerca, insegnamento e diffusione della conoscenza senza interferenze indebite (art. 13 della Carta dei diritti fondamentali dell'Unione europea, cit.)¹⁷. L'introduzione dei sistemi di intelligenza artificiale nei processi accademici può incidere anche su questo principio: da un lato, tali tecnologie possono offrire strumenti innovativi per la ricerca scientifica e per l'organizzazione delle attività didattiche¹⁸; dall'altro lato, l'uso

¹⁵ De Gregorio, G., *Digital Constitutionalism in Europe: Reframing Rights and Powers in the Algorithmic Society*, Cambridge University Press, Cambridge, 2022, pp. 40-65.

¹⁶ Selwyn, N., *Should Robots Replace Teachers? AI and the Future of Education*, Polity Press, Cambridge, 2019, pp. 75-102; Williamson, B., *Big Data in Education: The Digital Future of Learning, Policy and Practice*, SAGE, London, 2017, pp. 60-85; Pasquale, F., *The Black Box Society: The Secret Algorithms that Control Money and Information*, Harvard University Press, Cambridge (MA), 2015, pp. 3-18; Citron, D., *Technological Due Process*, "Washington University Law Review", n. 85, 2008, pp. 1249-1313.

¹⁷ UNESCO, *Recommendation on the Ethics of Artificial Intelligence*, UNESCO, Paris, 2021, pp. 1-45.

¹⁸ Karran, T., *Academic freedom and institutional autonomy: a comparative study*, "Higher Education Policy", n. 20, 2007, pp. 289-313. <https://doi.org/10.1057/palgrave.hep.8300159>

crescente di piattaforme digitali e sistemi algoritmici può comportare una maggiore dipendenza delle istituzioni accademiche da infrastrutture tecnologiche sviluppate e gestite da privati¹⁹.

Le Università digitali rappresentano un caso particolarmente significativo di questa evoluzione: operando interamente all'interno di ecosistemi digitali, tali istituzioni sono fortemente integrate con infrastrutture tecnologiche che supportano gran parte delle attività accademiche.

In questa prospettiva, la regolazione dell'intelligenza artificiale nei sistemi educativi non può essere interpretata esclusivamente come una questione tecnica o amministrativa. Essa deve essere collocata nel quadro più ampio della *governance* della conoscenza nell'era digitale. Il diritto internazionale dei diritti umani, insieme alle normative regionali e nazionali in materia di intelligenza artificiale, costituisce uno degli strumenti fondamentali attraverso cui gli Stati e le istituzioni internazionali possono orientare l'evoluzione dei sistemi educativi contemporanei.

Le trasformazioni sopra descritte devono inoltre essere lette alla luce del Processo di Bologna e dello sviluppo dello Spazio Europeo della Formazione Superiore (*European Higher Education Area – EHEA*), che hanno progressivamente definito un quadro di riferimento comune per le politiche universitarie europee. In tale contesto, principi quali la qualità, la trasparenza, la comparabilità dei titoli e l'accessibilità della formazione superiore costituiscono parametri fondamentali anche per l'integrazione delle tecnologie digitali e dei sistemi di intelligenza artificiale nei contesti accademici.

3. Il quadro normativo rilevante per le Università: l'AI Act e la Legge italiana

Come anticipato, il principale punto di riferimento normativo per la regolazione dell'intelligenza artificiale, nel quadro dell'analisi qui proposta e limitata al livello dell'Unione europea, è rappresentato dal Regolamento (UE) 2024/1689, noto come *Artificial Intelligence Act* (di seguito anche solo «AI Act» o «Regolamento»)²⁰.

Il Regolamento introduce un quadro giuridico armonizzato volto a disciplinare lo sviluppo, l'immissione sul mercato e l'utilizzo dei sistemi di intelligenza artificiale all'interno dell'Unione europea, con lo scopo di assicurare che le tecnologie basate sull'IA rispettino i diritti fondamentali delle persone, garantiscano

¹⁹ Srnicek, N., *Platform Capitalism*, Polity Press, Cambridge, 2017, pp. 43-70; Van Dijck, J., Poell, T., De Waal, M., *The Platform Society*, Oxford University Press, Oxford, 2018, pp. 11-34.

²⁰ Il Regolamento si applica ai: (i) fornitori e sviluppatori che immettono nel mercato europeo sistemi o modelli di IA, indipendentemente dal fatto che siano stabiliti nell'Unione o in un paese terzo; (ii) ai *deployer* (utilizzatori) dei sistemi di IA che hanno il loro luogo di stabilimento o sono situati all'interno dell'Unione Europea; (iii) ai fornitori e ai *deployer* di sistemi di IA che hanno il loro luogo di stabilimento o sono situati in un paese terzo, laddove l'output prodotto dal sistema di IA sia utilizzato nell'Unione Europea; (iv) agli utilizzatori che ne fanno uso a titolo professionale nel territorio Unione Europea; (v) agli importatori e ai distributori di IA all'interno dell'Unione Europea. Il Regolamento non si applica in materia di: (a) sicurezza nazionale; (b) sistemi utilizzati esclusivamente per scopi militari o di difesa; (c) persone fisiche che utilizzano sistemi di IA per scopi personali e non professionali. Sul Regolamento (UE) 2024/1689 del Parlamento europeo e del Consiglio del 13 giugno 2024 si vedano, su tutti, TADDEI ELMI, G., CONTALDO, A. (a cura di), *Intelligenza artificiale. AI Act – Regolamento (UE) 1689/2024. Il nuovo scenario giuridico europeo*, Pisa, 2024, pp. 1 sg. RICCIO, G. (A CURA DI), *Commentario al Regolamento (UE) 2024/1689 sull'Intelligenza Artificiale (AI Act)*, Torino, 2025, pp. 41 sg. RUFFOLO, U., AMIDEI, A., *Diritto dell'Intelligenza Artificiale*, Vol. 1, Roma, 2024, pp. 50 sg. Sia anche consentito un rinvio a GIORGETTA, A., *Il Regolamento (UE) 2024/1689 (Artificial Intelligence Act). Rischi, biases cognitivi e black box*, "Rivista Marittima - Bimestrale di geopolitica, diritto ed economia della Marina Militare", n. 3, 2025, pp. 62 sg.

elevati *standard* di sicurezza e siano coerenti con i valori fondativi dell'UE, favorendo allo stesso tempo il progresso tecnologico, la crescita economica e la competitività dell'industria europea. Gli obiettivi: creare un mercato unico per l'IA facilitando la libera circolazione e il riconoscimento dei sistemi di IA conformi alle norme dell'UE; aumentare la fiducia nell'IA: assicurare che i sistemi di IA siano affidabili, trasparenti e responsabili, rispettando i principi etici e i diritti fondamentali; prevenire e mitigare i rischi dell'IA, vietando o limitando l'uso dei sistemi di IA che presentano un rischio per la sicurezza, la salute, la dignità o l'autonomia delle persone. Per il raggiungimento di tutti questi fini, la struttura del Regolamento si fonda su un approccio basato sul rischio (*risk-based approach*), che distingue diverse categorie di sistemi di intelligenza artificiale in funzione del potenziale impatto sui diritti fondamentali e sulla sicurezza delle persone²¹.

I regolamenti dell'Unione Europea, come l'AI Act, sono per loro natura direttamente applicabili in tutti gli Stati membri, come stabilito dall'art. 288 del TFUE: il che significa che le loro disposizioni, a differenza di quelle contenute nelle direttive, creano immediatamente diritti e obblighi per i soggetti giuridici (cittadini, amministrazioni pubbliche, imprese) senza che sia necessaria una legge nazionale di recepimento. Le Autorità nazionali hanno dunque l'obbligo di applicare direttamente tali regolamenti, disapplicando qualsiasi norma interna che sia in contrasto con essi. Nonostante la diretta applicabilità, la piena operatività di un regolamento richiede quasi sempre l'adozione di misure nazionali di integrazione. Lo Stato membro deve intervenire per colmare gli aspetti che il regolamento lascia alla sua competenza, come la designazione delle Autorità nazionali di vigilanza, la definizione di un apparato sanzionatorio efficace, proporzionato e dissuasivo per le violazioni, e l'adeguamento della normativa esistente per garantire il coordinamento. Tali interventi non sono atti di trasposizione, bensì di attuazione e adeguamento, indispensabili per rendere il regolamento concretamente funzionante. In questo senso, il caso dell'AI Act è paradigmatico: l'approccio basato sul rischio del regolamento, che mira a rendere gli obblighi proporzionati al livello di rischio, rischierebbe di rimanere una clausola puramente programmatica se non venisse reso concreto, giacché la sua effettività dipende da scelte interpretative e tecniche successive, come la definizione di standard, le metodologie di valutazione della conformità e i sistemi di controllo sul mercato. Queste scelte pratiche sono infatti decisive per determinare il reale carico normativo e per assicurare che il principio di proporzionalità sia rispettato, evitando che la regolamentazione diventi un onere eccessivo e sproporzionato rispetto agli obiettivi di tutela.

Con l'adozione della l. n. 132/2025 (di seguito anche solo «Legge italiana»), l'Italia ha provveduto a delineare proprio tale quadro di attuazione, integrando la normativa europea nel nostro ordinamento, stabilendo principi generali e disposizioni per settori specifici, oltre a delegare al Governo l'adeguamento normativo di dettaglio.

Nel sistema di classificazione delineato dall'AI Act, alcune pratiche di intelligenza artificiale sono considerate incompatibili con i valori fondamentali dell'Unione e vengono pertanto vietate. Si tratta di quelle caratterizzate da un rischio c.d. «inaccettabile» (art. 6), nelle quali rientrano i sistemi che manipolano il comportamento umano o sfruttano le vulnerabilità di gruppi specifici: tale categoria non dovrebbe, quindi, generalmente interessare l'Università e – men che meno – la sua governance.

²¹ European Commission, *White Paper on Artificial Intelligence – A European approach to excellence and trust*, COM(2020) 65 final.

Altre categorie di interesse residuale per le specifiche tematiche qui in esame sono quelle del “limitato” e del rischio “minimo”.

La categoria sottoposta a peculiari obblighi di conformità e trasparenza è quella dei sistemi di intelligenza artificiale ad “alto rischio”.

Un sistema di IA può essere considerato come ad “alto rischio” principalmente in due casi: (i) come componente di sicurezza di un prodotto già soggetto alle normative di armonizzazione europee elencate nell’Allegato II dell’AI Act; (ii) oppure se rientra in uno degli usi specifici (stand-alone) elencati nell’Allegato III dell’AI Act. Settori in cui si identifica la presenza di sistemi di IA ad alto rischio sono – ad esempio – quelli della sanità, della giustizia, del credito e della finanza, delle infrastrutture e dei trasporti.

Vi rientra anche l’istruzione, giacché in tale settore entrano in gioco – come visto nel precedente paragrafo - diritti fondamentali. In particolare, l’Allegato III del Regolamento individua come sistemi ad alto rischio quelli impiegati per valutare l’accesso all’istruzione o per determinare il percorso educativo degli studenti, nonché quelli utilizzati per la valutazione dei risultati dell’apprendimento.

Per le istituzioni accademiche che utilizzano sistemi di intelligenza artificiale in tali ambiti, il Regolamento prevede una serie di obblighi specifici. Tra questi assumono particolare rilievo gli obblighi relativi alla qualità dei dati utilizzati per l’addestramento dei sistemi (art. 10), alla documentazione tecnica (art. 11), alla trasparenza delle operazioni algoritmiche (art. 13) e alla presenza di adeguati meccanismi di supervisione umana (art. 14). Sebbene non tutte queste applicazioni rientrino necessariamente nella categoria dei sistemi ad alto rischio, il Regolamento stabilisce comunque principi generali che incidono sull’organizzazione delle attività accademiche.

A questi obblighi si aggiungono le disposizioni relative alla trasparenza previste dal Titolo IV del Regolamento. In particolare, l’AI Act stabilisce che gli utenti devono essere informati quando interagiscono con sistemi di intelligenza artificiale e che i contenuti generati artificialmente devono essere chiaramente identificabili (art. 50): nelle Università, ciò implica la necessità di sviluppare politiche istituzionali chiare in merito all’utilizzo di strumenti generativi nelle attività didattiche e di ricerca.

4. Adempimenti di compliance per le Università e possibili integrazioni alla governance accademica

Il primo passo per una corretta *compliance* universitaria in materia di IA consiste nell’identificare il ruolo dell’istituzione rispetto ai sistemi di IA.

Su un piano soggettivo, la normativa distingue principalmente due figure.

L’Università che agisce come *deployer* (utilizzatore): essa è tale quando impiega un sistema di IA per le sue attività istituzionali.

Assume invece il ruolo di *provider* (fornitore) nel caso in cui sviluppi, o faccia sviluppare, un proprio sistema di IA per immetterlo sul mercato o metterlo in servizio con il proprio nome.

In risposta a questo quadro normativo, si sta delineando nel mondo delle istituzioni accademiche un generale consenso su una serie di principi operativi volti a tradurre i requisiti legali in pratiche concrete. Un principio fondamentale è la centralità dell'essere umano, secondo cui l'IA deve rimanere uno strumento di supporto, senza mai sostituire il giudizio critico e la capacità decisionale della persona. Questo approccio è pienamente allineato con l'art. 14 del Regolamento, che impone la progettazione di sistemi ad alto rischio in modo da consentire una sorveglianza umana efficace, e con l'art. 3 della Legge italiana, che sancisce il rispetto dell'autonomia e del potere decisionale dell'uomo.

Strettamente connesso è il principio della responsabilità individuale. L'orientamento emergente è che chiunque utilizzi strumenti di IA sia personalmente responsabile dell'uso che ne fa e dei risultati che ne derivano. Questa prassi operativa traduce in un dovere individuale gli obblighi che il Regolamento pone in capo al *deployer*, come quello di utilizzare il sistema conformemente alle istruzioni e di monitorarne il funzionamento (art. 26 del Regolamento).

Un altro pilastro è la trasparenza nell'utilizzo. Si sta consolidando la prassi di richiedere una dichiarazione esplicita quando l'IA viene utilizzata in modo "sostanziale". Questa pratica attua concretamente il principio generale di trasparenza richiesto dall'art. 3 della Legge italiana e va oltre l'obbligo minimo dell'art. 50 del Regolamento, che impone di informare le persone quando interagiscono con un sistema di IA o quando un contenuto è generato artificialmente.

L'obbligo di verificare l'accuratezza degli *output* generati dall'IA è un altro punto condiviso. Gli utenti sono chiamati a un approccio critico, consapevoli che i modelli possono produrre informazioni imprecise o distorte. Tale dovere di verifica a carico dell'utente finale integra e rafforza i requisiti di accuratezza, robustezza e cibersecurity che l'art. 15 del Regolamento impone ai fornitori di sistemi ad alto rischio.

La protezione dei dati e della riservatezza è un'altra area di attenzione. Le linee guida operative che si stanno affermando vietano l'inserimento di dati personali, sensibili o informazioni confidenziali in piattaforme di IA di terze parti senza adeguate garanzie. Questo è pienamente conforme sia ai principi del Regolamento generale sulla protezione dei dati (GDPR)²², richiamati dall'art. 4 della Legge italiana, sia ai requisiti di *governance* dei dati dell'art. 10 del Regolamento.

Anche il rispetto della proprietà intellettuale è un tema centrale. L'utente è ritenuto responsabile di eventuali plagii e deve assicurarsi che l'uso di contenuti generati dall'IA non violi i diritti di terzi. Questa impostazione è coerente con l'art. 25 della Legge italiana, che protegge le opere dell'ingegno umano anche se create con l'ausilio dell'IA, purché l'apporto umano sia identificabile.

Infine, emerge un'attenzione crescente ai principi di equità e non discriminazione. L'uso dell'IA deve avvenire in modo da non creare o amplificare pregiudizi. Questo riflette direttamente uno dei principi cardine della Legge italiana (Art. 3) e uno dei requisiti fondamentali per i sistemi ad alto rischio nel Regolamento, che impone misure per rilevare e correggere le distorsioni (Art. 10).

²² Come noto, il GDPR (*General Data Protection Regulation*), ufficialmente Regolamento (UE) n. 2016/679, è il regolamento dell'Unione europea in materia di trattamento dei dati personali e di *privacy*.

L'adempimento di tali obblighi normativi richiede all'Università di dotarsi di una struttura di *governance* adeguata, che definisca chiaramente la strutturazione interna, i ruoli e i meccanismi di controllo, onde evitare ipotesi di responsabilità anzitutto civili²³ ed amministrative²⁴.

L'adempimento degli obblighi normativi previsti dall'AI Act impone alle organizzazioni che sviluppano o utilizzano sistemi di IA, comprese le Università, l'adozione di adeguati assetti organizzativi e procedurali finalizzati alla gestione dei rischi e alla garanzia della conformità normativa. Sebbene il Regolamento non prescriva un modello organizzativo specifico, esso richiede che i soggetti coinvolti nello sviluppo o nell'uso di sistemi di IA ad alto rischio implementino modelli di *governance* interna in grado di assicurare la chiara attribuzione di responsabilità, la tracciabilità delle decisioni e la gestione sistematica dei rischi.

In particolare, l'AI Act prevede obblighi articolati che includono, tra l'altro, l'adozione di sistemi di *risk management* (art. 9), la predisposizione della documentazione tecnica (art. 11), nonché l'effettuazione, in determinati casi, di una valutazione d'impatto sui diritti fondamentali (*Fundamental Rights Impact Assessment* o FRIA) ai sensi dell'art. 27.

Con riguardo alla formazione superiore europea, tali obblighi di compliance vanno coordinati con gli standard sviluppati nello Spazio Europeo della Formazione Superiore (EHEA), in particolare con gli *Standards and Guidelines for Quality Assurance* (ESG), che promuovono sistemi di assicurazione della qualità fondati su trasparenza, responsabilità e miglioramento continuo. L'integrazione tra tali strumenti e i requisiti dell'AI Act rappresenta una delle principali sfide per la governance universitaria contemporanea.

²³ L'AI Act e la Legge italiana delineano una catena di responsabilità civili che coinvolge il fornitore del sistema, l'importatore, il distributore e l'utente finale. In estrema sintesi, il quadro normativo presenta il seguente scenario: (i) per un danno derivante da un vizio di progettazione o da un malfunzionamento intrinseco del sistema di IA, la responsabilità principale ricade sul fornitore (in virtù degli obblighi imposti dall'AI Act) e la vittima del danno beneficerà presumibilmente di un regime probatorio agevolato, in attuazione della delega prevista dalla Legge italiana, che sposterà sul fornitore l'onere di dimostrare l'assenza di difetti o di nesso causale, in analogia con quanto già avviene in materia di GDPR; (ii) più limitati, invece, i casi di responsabilità dell'importatore o del distributore; (iii) quanto al *deployer*, questo potrebbe essere chiamato a rispondere in prima battuta verso il terzo danneggiato; tuttavia, potrà esercitare un'azione di rivalsa nei confronti del fornitore e la sua posizione sarà tanto più solida quanto più sarà in grado di dimostrare di aver agito con diligenza (qualificata), ovvero di aver utilizzato e monitorato il sistema in conformità alle istruzioni e ai principi di sorveglianza umana, senza apportare modifiche sostanziali.

²⁴ L'AI Act affida agli Stati membri la predisposizione di un apparato di vigilanza e di reazione sanzionatoria fondato, per un verso, su poteri amministrativi (ordini di adeguamento, limitazione o ritiro dal mercato, sospensione dell'uso dei sistemi) e, per l'altro, su un sistema di sanzioni pecuniarie graduato per gravità. In tale cornice, le violazioni più gravi – tipicamente legate all'impiego di pratiche vietate o alla inosservanza di obblighi cardine – possono condurre a sanzioni fino a 35.000.000 di euro ovvero fino al 7% del fatturato mondiale annuo totale dell'impresa (a seconda di quale importo sia superiore), mentre per altre inosservanze il massimo edittale è fissato su scaglioni inferiori. Più precisamente, l'art. 99 distingue tre fasce: (a) fino a 35 milioni di euro o al 7% del fatturato mondiale per violazioni delle pratiche vietate (art. 5); (b) fino a 15 milioni di euro o al 3% per inadempimenti a obblighi e requisiti del Regolamento (tra cui quelli gravanti su fornitori e *deployer* dei sistemi ad alto rischio e gli obblighi di trasparenza); (c) fino a 7,5 milioni di euro o all'1% per la fornitura di informazioni false o incomplete alle autorità. L'art. 100 prevede, per le istituzioni, organi e organismi dell'Unione, un regime speciale con potere sanzionatorio in capo al Garante Europeo della Protezione dei Dati (EDPS), mentre l'art. 101 attribuisce alla Commissione europea il potere di comminare sanzioni ai fornitori che violino gli obblighi (ad es. mancata cooperazione o mancata mitigazione del rischio sistemico). In punto di competenze, le Autorità nazionali di sorveglianza del mercato irrogano le sanzioni ex art. 99; l'EDPS opera nei confronti delle istituzioni UE ex art. 100; la Commissione, tramite l'AI Office, esercita i poteri sanzionatori ex art. 101 verso i provider. In termini procedurali, il Regolamento scandisce il procedimento in una sequenza che, in sintesi, comprende: 1) avvio di indagine o ispezione; 2) comunicazione delle violazioni presunte e diritto di essere ascoltati; 3) possibilità di misure correttive volontarie; 4) decisione sull'irrogazione della sanzione pecuniaria con indicazione di importo e termini; 5) pubblicazione o notifica e possibilità di ricorso giurisdizionale (dinanzi ai giudici nazionali o, per le decisioni ex art. 101, dinanzi alla Corte di Giustizia). In tema si veda Fragasso, B., *Intelligenza artificiale e responsabilità penale. Principi e categorie alla prova di una tecnologia imprevedibile*, Torino, 2025.

Nell'ambito delle Università italiane, tali obblighi devono essere letti alla luce dell'assetto istituzionale delineato dalla legge 30 dicembre 2010, n. 240, che disciplina l'organizzazione e la *governance* degli atenei. Ai sensi dell'art. 2 della legge n. 240/2010, l'assetto di governo delle istituzioni universitarie è strutturato intorno a una distinzione funzionale tra organi di indirizzo accademico, organi di gestione amministrativo-finanziaria e strutture amministrative di supporto. In questo quadro, il Rettore, il Senato Accademico e il Consiglio di Amministrazione costituiscono i principali organi di governo dell'ateneo, mentre la gestione amministrativa è affidata al Direttore Generale e all'apparato amministrativo.

Alla luce di tale modello organizzativo, l'adempimento degli obblighi derivanti dall'AI Act richiede che l'Università sviluppi un sistema interno di governance dell'intelligenza artificiale capace di coordinare le competenze scientifiche, giuridiche e amministrative presenti all'interno dell'istituzione.

In questa prospettiva, gli atenei potrebbero valutare l'istituzione o il rafforzamento di organismi dedicati alla gestione dei rischi e alla supervisione delle tecnologie di IA. Tra questi, assume particolare rilievo l'eventuale istituzione di un Comitato Etico per l'Intelligenza Artificiale o di un Gruppo di Lavoro Interdisciplinare, composto da esperti di ambito giuridico, informatico, etico e organizzativo. Tale organismo, avente natura prevalentemente consultiva, si collocherebbe nell'area delle funzioni di indirizzo accademico e potrebbe operare a supporto del Senato Accademico e degli altri organi di governo dell'ateneo, fornendo pareri sui progetti di sviluppo o di utilizzo di sistemi di IA e contribuendo alla valutazione preventiva dei rischi connessi all'impiego di tali tecnologie.

Parallelamente, sul piano amministrativo e gestionale, potrebbe risultare opportuno prevedere l'istituzione di un Ufficio di Conformità IA o il potenziamento delle funzioni del Responsabile della protezione dei dati (*Data Protection Officer* – DPO), al fine di assicurare una gestione coordinata degli obblighi derivanti dall'AI Act e dal GDPR. In effetti, le due discipline normative presentano numerosi punti di intersezione, in quanto molti sistemi di IA implicano il trattamento di dati personali e possono quindi dar luogo a cumuli di responsabilità derivanti da violazioni parallele delle due normative²⁵. In tale prospettiva, l'ufficio di conformità potrebbe essere incaricato della gestione della documentazione tecnica dei sistemi di IA, del supporto alle procedure di valutazione della conformità, della registrazione dei sistemi nella banca dati europea prevista dal Regolamento e della gestione dei rapporti con le autorità di vigilanza competenti.

In questo contesto, la *governance* universitaria dovrebbe assicurare una chiara distribuzione delle responsabilità tra i diversi livelli organizzativi. Agli organi di governo dell'ateneo, e in particolare al Rettore e al Consiglio di Amministrazione, spetterebbe la definizione delle politiche strategiche in materia di utilizzo dell'intelligenza artificiale e l'adozione dei regolamenti interni necessari per garantire la conformità al diritto europeo. Il Senato Accademico, in quanto organo competente per l'indirizzo scientifico e didattico dell'ateneo, potrebbe invece svolgere un ruolo centrale nella definizione delle linee guida per l'uso dell'IA nella ricerca e nella formazione, nonché nella promozione di attività di formazione e aggiornamento della comunità universitaria, in linea con il requisito di alfabetizzazione in materia di IA previsto dall'art. 4 dell'AI Act.

²⁵ Sulle intersezioni tra IA e GDPR, si veda in particolare Lombardi, A., *Disciplina della tutela dei dati personali e regolazione dell'intelligenza artificiale: rapporti, analogie e differenze tra GDPR e AI Act*, "European Journal of Privacy Law & Technologies", n. 2, 2023, pp. 240 sg.

La gestione operativa dei processi di conformità sarebbe affidata al Direttore Generale e alla struttura amministrativa dell'ateneo, che dovrebbe garantire l'implementazione di procedure interne idonee ad assicurare la tracciabilità delle decisioni automatizzate, la prevenzione dei conflitti di interesse e l'adozione di meccanismi di controllo continui.

In definitiva, l'attuazione degli obblighi previsti dall'AI Act richiede l'integrazione delle nuove esigenze di *governance* tecnologica all'interno del sistema istituzionale già delineato dalla vigente legislazione universitaria. Ciò implica lo sviluppo di un modello organizzativo capace di coordinare le funzioni di indirizzo strategico, supervisione etica e gestione amministrativa, al fine di garantire che l'utilizzo dei sistemi di intelligenza artificiale avvenga nel rispetto dei principi di sicurezza, trasparenza e tutela dei diritti fondamentali sanciti dal diritto europeo. Tutte tali implicazioni normative risultano ancora più evidenti se si considera il ruolo crescente delle Università digitali.

Come già osservato, queste istituzioni, che operano attraverso piattaforme digitali integrate e sistemi di gestione dell'apprendimento *online*, fanno spesso un uso più intensivo di strumenti di analisi dei dati e dei sistemi automatizzati rispetto alle Università tradizionali. Di conseguenza, esse si trovano in una posizione particolarmente significativa per osservare l'impatto dell'AI Act sulle istituzioni accademiche.

L'adozione dei sistemi di intelligenza artificiale in tali contesti richiede infatti lo sviluppo di nuove forme di *governance* istituzionale. Le Università devono essere in grado di garantire la conformità alle norme europee, assicurando al contempo il rispetto dei principi fondamentali che caratterizzano la formazione superiore, quali l'autonomia accademica, la libertà di ricerca e l'equità nell'accesso alle opportunità educative. L'applicazione nei sistemi universitari di uno strumento di regolazione tecnologica come l'AI Act apre dunque uno spazio di riflessione più ampio sul rapporto tra innovazione tecnologica, *governance* istituzionale e tutela dei diritti fondamentali; rapporto la cui estrema rilevanza si apprezza particolarmente se si considera la dimensione internazionale del diritto all'istruzione.

5. Conclusione

L'utilizzo dei sistemi algoritmici nei processi accademici – dalla gestione delle piattaforme digitali per l'apprendimento alla produzione e diffusione dei contenuti scientifici – incide profondamente sulle modalità attraverso cui la conoscenza viene diffusa.

L'analisi sviluppata nel presente contributo ha evidenziato come tali trasformazioni si collochino all'intersezione tra diversi livelli normativi. Per un verso, il diritto internazionale dei diritti umani continua a rappresentare il contesto normativo entro il quale devono essere interpretate le implicazioni dell'utilizzo di tecnologie algoritmiche nei sistemi educativi, in particolare con riferimento al diritto all'istruzione, alla libertà accademica e all'accesso equo alla conoscenza. Per l'altro, il diritto dell'Unione europea ha avviato un processo di regolazione sistematica dell'intelligenza artificiale attraverso l'adozione dell'AI Act, che introduce un quadro giuridico fondato sulla gestione dei rischi e sulla tutela dei diritti fondamentali.

Operando sempre più all'interno di ecosistemi pienamente digitalizzati, le Università rappresentano uno degli ambiti nei quali l'intelligenza artificiale può essere integrata in modo più sistematico nei

processi educativi e organizzativi. Proprio per questa ragione, esse costituiscono un osservatorio privilegiato per analizzare le implicazioni giuridiche della trasformazione digitale della formazione superiore. Comprendere come tali trasformazioni possano essere dirette attraverso adeguati strumenti giuridici di *governance* e *compliance* rappresenta una delle sfide principali per gli ordinamenti contemporanei.

Bibliografia

Alston, P., Quinn, G. *The Nature and Scope of States Parties' Obligations under the International Covenant on Economic, Social and Cultural Rights*, "Human Rights Quarterly", n. 9, 1987, pp. 156-229.

Ammannati, L., Greco, G.L. *Piattaforme digitali, algoritmi e big data: il caso del credit scoring*, "Rivista Trimestrale di Diritto dell'Economia", n. 2, 2021, pp. 290 sg.

Ammannati, L., Greco, G.L. *Il credit scoring "intelligente": esperienza, rischi e nuove regole*, "Rivista di Diritto bancario", n. 3 – Sezione I, 2023, p. 261.

Bagni, F., *Uso degli algoritmi nel mercato del credito: dimensione nazionale ed europea*, "Osservatorio sulle fonti", n. 2, 2021, pp. 909 sg.

Barendt, E., *Academic Freedom and the Law: A Comparative Study*, Hart Publishing, Oxford, 2010.

Barone, G., *Machine learning e intelligenza artificiale - Metodologie per lo sviluppo di sistemi automatici*, Dario Flaccovio Editore, Palermo, 2021.

Barresi, D., *Il rating ESG delle società di capitali*, "Rivista di Diritto Societario", n. 4, 2024, pp. 231 sg.

Battelli, E., *Innovazione tecnologica e gestione della filiera agroalimentare*, "Rivista di diritto agrario", n. 3, 2024, pp. 455 sg.

Bonelli, C., *Governance bancaria e controlli interni*, "Rivista di Diritto Bancario", n. 5, 2021, pp. 202 sg.

Borghi, P., *L'agricoltura 4.0. Il futuro del settore agroalimentare e il filo rosso che lo lega alle origini della PAC*, "Rivista di diritto alimentare", Quaderno n. 1, 2023, pp. 5-10.

Canfora, I., *Politica Agricola Comune e digitalizzazione del comparto agroalimentare*, "Rivista di diritto alimentare", Quaderno n. 1, 2023, pp. 11-19.

Cerrato, S., Culasso, F., Crocco, E., *"Handle with care". Per una governance dell'intelligenza artificiale: rischi, tecniche di gestione, assetti cibernetici*, "Rivista delle società", nn. 2-3, 2023, pp. 371 sg.

Citron, D., *Technological Due Process*, "Washington University Law Review", n. 85, 2008, pp. 1249-1313.

Craig, P., De Búrca, G., *EU Law: Text, Cases and Materials*, Oxford University Press, Oxford, 2015.

Craven, M., *The International Covenant on Economic, Social and Cultural Rights: A Perspective on its Development*, Oxford University Press, Oxford, 1995.

D'Addezio, M., *Sostenibilità e responsabilità nel settore agricolo e nelle filiere produttive intersettoriali*, "Rivista di diritto agrario", n. 3, 2025, pp. 40 sg.

De Gregorio, G., *Digital Constitutionalism in Europe: Reframing Rights and Powers in the Algorithmic Society*, Cambridge University Press, Cambridge, 2022.

De Witte, B., *The EU Charter of Fundamental Rights: The Legal Status and Scope of Application*, "European Law Review", n. 26, 2001, pp. 202-214.

Denoza, F., *ESG, investitori istituzionali e diritto societario*, "Rivista delle società", n. 2, 2022, pp. 31 sg.

European Commission, *White Paper on Artificial Intelligence – A European approach to excellence and trust*, COM(2020) 65 final, Brussels, 2020.

Floridi, L., Cows, J., *A unified framework of five principles for AI in society*, "Harvard Data Science Review", n. 1, 2019, pp. 1-15. <https://doi.org/10.1162/99608f92.8cd550d1>

Fragasso, B., *Intelligenza artificiale e responsabilità penale. Principi e categorie alla prova di una tecnologia imprevedibile*, Giappichelli, Torino, 2025.

Gambino, A., Scorza, G., Stazi, A. (a cura di) *Il diritto della tecnofinanza (fintech)*, Giappichelli, Torino, 2018.

Giorgetta, A., *Il Regolamento (UE) 2024/1689 (Artificial Intelligence Act). Rischi, biases cognitivi e black box*, "Rivista Marittima - Bimestrale di geopolitica, diritto ed economia della Marina Militare", n. 3, 2025, pp. 62 sg.

Harris, D., O'Boyle, M., Bates, E., Buckley, C., *Law of the European Convention on Human Rights*, Oxford University Press, Oxford, 2018.

Henkin, L., *The Age of Rights*, Columbia University Press, New York, 1990.

Hess, C., Ostrom, E., *Understanding Knowledge as a Commons: From Theory to Practice*, MIT Press, Cambridge (MA), 2007.

Karran, T., *Academic freedom and institutional autonomy: a comparative study*, "Higher Education Policy", n. 20, 2007, pp. 289-313. <https://doi.org/10.1057/palgrave.hep.8300159>

Karran, T., *Academic freedom in Europe: reviewing UNESCO's recommendation*, "Higher Education Policy", n. 22, 2009, pp. 191-215.

Lenaerts, K., *The EU Charter of Fundamental Rights: Scope of Application and Interpretation*, "Maastricht Journal of European and Comparative Law", n. 21, 2014, pp. 375-403.

Lombardi, A., *Disciplina della tutela dei dati personali e regolazione dell'intelligenza artificiale: rapporti, analogie e differenze tra GDPR e AI Act*, "European Journal of Privacy Law & Technologies", n. 2, 2023, pp. 240 sg.

Lucchini Guastalla, E., *ESG e doveri degli amministratori*, "Rivista delle società", n. 3, 2021, pp. 112 sg.

Mantelero, A., *Artificial intelligence and data protection: challenges for fundamental rights*, "Computer Law & Security Review", n. 34, 2018, pp. 643-654.

Marchetti, B., *La regolazione europea del mercato dell'intelligenza artificiale*, "Rivista della Regolazione dei Mercati", n. 1, 2024, pp. 3-9.

Marmo, R., *Algoritmi per l'intelligenza artificiale*, Hoepli, Milano, 2021.

Milli, C., *L'uso dell'Intelligenza Artificiale nella previsione del rischio di dissesto bancario. Nuove prospettive di indagine*, "Rivista di Diritto Bancario", n. 7, 2024, pp. 231 sg.

Montalenti, P., *Società, mercati finanziari e fattori ESG: ultimi sviluppi*, "Rivista Corporate Governance", n. 2, 2025, pp. 9 sg.

Pasquale, F., *The Black Box Society: The Secret Algorithms that Control Money and Information*, Harvard University Press, Cambridge (MA), 2015.

Pisciotta Tosini, G., (a cura di) *La rilevanza della digitalizzazione per un mercato agroalimentare sostenibile*, Palermo University Press, 2023.

Riccio, G., (a cura di) *Commentario al Regolamento (UE) 2024/1689 sull'Intelligenza Artificiale (AI Act)*, Ipsoa, Milano, 2025.

Ruffolo, U., Amidei, A., *Diritto dell'Intelligenza Artificiale*, Vol. 1, Luiss University Press, Roma, 2024, pp. 50 sg.

Saul, B., Kinley, D., Mowbray, J., *The International Covenant on Economic, Social and Cultural Rights: Commentary, Cases and Materials*, Oxford University Press, Oxford, 2014.

Selwyn, N., *Should Robots Replace Teachers? AI and the Future of Education*, Polity Press, Cambridge, 2019.

Srnicek, N., *Platform Capitalism*, Polity Press, Cambridge, 2017.

Taddei Elmi, G., Contaldo, A. (a cura di) *Intelligenza artificiale. AI Act – Regolamento (UE) 1689/2024. Il nuovo scenario giuridico europeo*, Pacini, Pisa, 2024, pp. 1 sg.

Tomasevski, K., *Human rights obligations in education: the 4-A scheme*, "Right to Education Primers", n. 3, 2001, pp. 1-46.

Tomuschat, C., *Human Rights: Between Idealism and Realism*, Oxford University Press, Oxford, 2014.

UNESCO, *Recommendation on the Ethics of Artificial Intelligence*, UNESCO, Paris, 2021.

Van Dijck, J., Poell, T., De Waal, M., *The Platform Society*, Oxford University Press, Oxford, 2018.

Williamson, B., *Big Data in Education: The Digital Future of Learning, Policy and Practice*, SAGE, London, 2017.

How the Bologna Process Governs Without Law: A Para-Comitological Perspective on European Higher Education

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| Abstract

This article proposes a para-comitological interpretation of the Bologna Process, arguing that its governance architecture is committee-centred and functionally comparable to EU comitology while remaining legally distinct. Although the Bologna Process is formally intergovernmental and non-binding, it has developed a stable and highly structured coordination system based on permanent and semi-permanent bodies, proceduralised working methods and iterative policy cycles. While existing literature has analysed the Bologna Process mainly through the lenses of soft law, Europeanisation and experimentalist governance, limited attention has been paid to the implications of its committee-based architecture as a governance model in its own right.

Drawing on a qualitative analysis of institutional documents – including ministerial communiqués, the Rules of Procedure of the Bologna Follow-Up Group (BFUG), mandates of working groups and documents relating to the Bologna Secretariat – this article reconstructs the operational structure of the process and compares it functionally with EU comitology under Article 291 of the Treaty on the Functioning of the European Union (TFEU). Rather than claiming legal equivalence, comitology is used as an analytical benchmark to identify similarities in governance practices, including delegated technical work, reliance on expertise, procedural continuity and structured follow-up mechanisms.

The concept of para-comitology is introduced to capture these dynamics. The article argues that the Bologna Process represents a mature form of institutionalised soft governance, offering a useful perspective for analysing coordination mechanisms in policy areas characterised by limited formal competences and raising broader questions about legitimacy, accountability and governance beyond hard law in European integration.

Keywords: Bologna Process, European Higher Education Area (EHEA), Comitology, Para-comitology, Committee-based governance, Bologna follow-up group (BFUG), Experimentalist governance.

1. Introduction and Structure of the Article

Over the past two decades, the Bologna Process has profoundly reshaped the landscape of higher education in Europe, contributing to the creation of the European Higher Education Area (EHEA) through a wide range of shared objectives, instruments and policy priorities¹. Despite its formally intergovernmental character and the absence of binding legal obligations, the process has demonstrated a remarkable degree of continuity, resilience and capacity for coordination across diverse national systems².

Scholarly analyses have extensively examined the Bologna Process as a paradigmatic example of soft law governance, voluntary cooperation and Europeanisation beyond formal competences³. In this literature, particular attention has been paid to its reliance on political commitments, peer learning and mutual trust, as well as to its interaction with European Union policies in the field of education⁴. More recently, the Bologna Process has also been interpreted through the lens of experimentalist governance, highlighting its iterative policy cycles and adaptive capacity⁵. While these approaches have significantly advanced the understanding of the Bologna Process, less attention has been devoted to the implications of its internal governance architecture as a structured and stabilised mode of coordination. In particular, the role played by the Bologna Follow-Up Group (BFUG), its Board, the Bologna Secretariat and the various working and advisory groups has often been described in functional or descriptive terms, without being systematically analysed as part of a broader committee-centred governance arrangement⁶.

This article addresses this gap by focusing on the organisational and procedural features through which the Bologna Process is governed between ministerial conferences. Rather than asking whether the Bologna Process produces binding effects or should be legally formalised, the analysis examines how governance is exercised in practice through permanent and semi-permanent bodies, delegated technical work and proceduralised follow-up mechanisms⁷.

To capture these features, the article proposes a para-comitological reading of the Bologna Process. This perspective does not seek to assimilate the Bologna Process to EU comitology in legal terms, nor to suggest the existence of executive powers comparable to those established under Article 291 of the

¹ European Ministers of Education. The Bologna Declaration of 19 June 1999. <https://www.ehea.info/page-ministerial-declarations-and-communiqués> [last accessed 9 June 2026]. Corbett, A., *Ping-pong: Competing leadership for reform in EU higher education 1998–2006*, "European Journal of Education, Research, Development and Policy", Vol. 46, no. 1, 2011, pp. 36–53. <https://doi.org/10.1111/j.1465-3435.2010.01466.x>.

² Lažetić, P., *Managing the Bologna Process at the European level: Institution and actor dynamics*. "European Journal of Education", Vol. 45, no. 4, 2010, pp. 549–562. <https://doi.org/10.1111/j.1465-3435.2010.01451.x>.

³ Ravinet, P., *From voluntary participation to monitored coordination: Why European countries feel increasingly bound by their commitment to the Bologna Process*, "European Journal of Education", Vol. 43, no. 3, 2008, pp. 353–367. <https://doi.org/10.1111/j.1465-3435.2008.00359.x>. Deca, L., Harmsen, R., *Taking Stock of the Bologna Process at 20. The Possibilities and Limits of Soft Law Governance*, in Curaj, A., Deca, L., Pricopie, R., (eds.), *The European Higher Education Area: Challenges for a New Decade*, Springer, 2020, pp. 417–436. <https://doi.org/10.1007/978-3-030-56316-5>.

⁴ Corbett, A., *Ping-pong: Competing leadership...*, cit.

⁵ Harmsen, R., *Future Scenarios for the European Higher Education Area: Exploring the Possibilities of "Experimentalist Governance"*, in Curaj, A., Matei, L., Pricopie, R., Salmi, J., Scott, P. (eds) *The European Higher Education Area*, Springer, 2015, pp. 785–803. https://doi.org/10.1007/978-3-319-20877-0_48

⁶ Lažetić, P., *Managing the Bologna Process at the European level...*, cit.

⁷ European Higher Education Area (EHEA), *BFUG Rules of Procedure 2021–2024*. <https://www.ehea.info>. [last accessed 9 June 2026].

Treaty on the Functioning of the European Union (TFEU)⁸. Instead, it uses comitology as a conceptual reference point to explore functional similarities in committee-based governance, while explicitly acknowledging the legal and institutional distinctiveness of the Bologna Process⁹. By adopting this analytical lens, the article aims to contribute to ongoing debates on governance beyond hard law in the European integration context. It argues that examining the Bologna Process as a form of committee-centred governance helps to explain its durability, its capacity to generate policy coherence and its increasing degree of institutionalisation, despite the absence of binding regulatory instruments¹⁰. The following section sets out the methodological and analytical framework used to develop this argument.

The article is structured as follows. Section 2 outlines the methodological and analytical framework, explaining the qualitative and functional-comparative approach adopted and clarifying the use of para-comitology as an analytical concept. Section 3 reconstructs the governance architecture of the Bologna Process, focusing on the roles of the Ministerial Conference, the Bologna Follow-Up Group, its Board, the Bologna Secretariat and the working and advisory groups. Section 4 situates the Bologna Process within the broader literature on soft law and experimentalist governance, highlighting the mechanisms through which coordination and policy learning are organised in the European Higher Education Area. Section 5 introduces the concept of para-comitology and develops it as an analytical framework, discussing its scope, limits and relevance for the analysis of Bologna governance. Section 6 presents a functional comparison between EU comitology and the Bologna Process, supported by a comparative table that summarises key structural and procedural dimensions of committee-based governance. Finally, Section 7 discusses the broader implications of the findings for European higher education governance and governance beyond hard law, before the concluding remarks in Section 8.

2. Methodology and Analytical Framework

The analysis developed in this article is based on a qualitative and interpretative research design aimed at examining the governance mechanisms of the Bologna Process through a functional-comparative perspective¹¹. Rather than assessing legal effects or national implementation outcomes, the focus is placed on the internal organisation of the process and on the operational role of its governing bodies.

The empirical basis of the study consists of a structured review of official documents produced within the European Higher Education Area, including the Rules of Procedure of the Bologna Follow-Up Group, the Terms of Reference and final outputs of Bologna working and advisory groups, Ministerial Communiqués and documents outlining the mandate and functions of the Bologna Secretariat¹². These materials are analysed to identify patterns of coordination, delegation and procedural continuity¹³.

⁸ Craig, P., de Búrca, G., *EU Law, Cases and Materials* (7th ed.), Oxford University Press, UK, 2020.

⁹ Cf. Christiansen, T., Larsson, T., (eds), *The Role of Committees in the Policy-Process of the European Union*, Cheltenham, Edgar Elgar Publishing, 2007.

¹⁰ Bergan, S., Matei, L., *The Future of the Bologna Process and the European Higher Education Area: New Perspectives on a Recurring Topic. European Higher Education Area: Challenges for a New Decade*, in Curaj, A., Deca, L., Pricopie, R., (eds) *European Higher Education Area: Challenges for a New Decade*, Springer, 2020, pp. 361-373. https://doi.org/10.1007/978-3-030-56316-5_23.

¹¹ Harmsen, R., *Future Scenarios for the European Higher Education Area...*, cit.

¹² Bergan, S., Matei, L., *The Future of the Bologna Process and the...*, cit. European Higher Education Area (EHEA), BFUG Rules of..., cit.

¹³ Lažetić, P., *Managing the Bologna Process at the European level...*, cit.

Documents relating to the governance of the process were analysed and categorised as follows: Ministerial Conferences and Communiqués, BFUG meetings, BFUG Board meetings and the EHEA Secretariat. With regard to the working structures of the process, the period 2018–2025 was analysed in particular, given that, from 2018 onwards, under the Italian EHEA Secretariat, countries have structured the process's work plan more effectively and introduced more standardised, clear and transparent processes and methodologies, an approach that has been continued by both the Albanian Secretariat and the current one entrusted to Romania and Moldova¹⁴.

From an analytical standpoint, the article adopts a functional approach to governance, focusing on how decision-shaping and coordination occur in practice rather than on formal legal classifications. This approach is informed by scholarship on soft governance and experimentalist policy-making in the European context¹⁵.

Within this framework, EU comitology is used as an analytical reference model. Comitology, as defined under Article 291 TFEU, provides a structured example of committee-based governance designed to support policy implementation through technical coordination and state oversight¹⁶. In this article, comitology does not function as a legal comparator but as a heuristic device. Building on this comparison, the concept of para-comitology is introduced to describe governance arrangements that rely on committee-centred structures and proceduralised coordination while operating outside the framework of binding EU law. The concept captures the specific institutional configuration of the Bologna Process, which combines political steering at ministerial level with sustained technical work carried out by stable bodies over successive policy cycles¹⁷. Finally, the methodological choice to privilege functional comparison over formal equivalence allows the analysis to remain sensitive to the distinctive legal and political nature of the Bologna Process¹⁸. The para-comitological framework is not intended to redefine the legal status of the process, but to offer an interpretative tool for understanding how governance in the European Higher Education Area has become increasingly institutionalised through committee-based practices, despite the absence of binding regulatory instruments.

3. The Current Governance Architecture of the Bologna Process

The governance of the Bologna Process is organised around a multilayered institutional architecture that operates between ministerial conferences and ensures the continuity of policy coordination within

¹⁴ European Higher Education Area, *BFUG Work Plan 2018–2020 – Final Reports from Advisory and Coordination Groups*, Rome Ministerial Conference, 2020. <https://ehea2020rome.it/pages/documents>.

European Higher Education Area, *Role of the BFUG Secretariat: Terms of Reference for the Period 1 July 2018–30 June 2020*, BFUG Meeting, 3 October 2018. https://ehea.info/Upload/document/bfug/63/BFUG_AU_CH_63_5_ToR_Secretariat.pdf [last accessed 9 June 2026].

European Higher Education Area, *Bologna Follow-Up Group Work Plan 2021–2024*, 2021. https://ehea.info/Upload/Board_PT_AN_75_DraftWorkPlan_andTORs_Annex_I%20-%20Copy%201.pdf [last accessed 9 June 2026].

European Higher Education Area, *Role of the Bologna Secretariat: Terms of Reference (ToR) 2021–2024*, Meeting, 20 April 2021. https://ehea.info/Upload/BFUG_PT_AD_76_4.1_bfug%20secretariat_tors_for_2021-2024.pdf [last accessed 9 June 2026].

¹⁵ Sabel, C. F., Zeitlin, J., *Learning from difference: The new architecture of experimentalist governance in the EU*, "European Law Journal", Vol. 14, no. 3, 2008, pp. 271–327. <https://doi.org/10.1111/j.1468-0386.2008.00415.x>. Deca, L., Harmsen, R., Taking Stock of the Bologna Process at 20..., cit.

¹⁶ Craig, P., de Búrca, G., *EU law: Text...*, cit. Christiansen, T., Larsson, T., (eds), *The Role of Committees in the Policy-Process...*, cit.

¹⁷ Lažetić, P., *Managing the Bologna Process at the European level...*, cit. Harmsen, R., *Future Scenarios for the European Higher Education Area...*, cit.

¹⁸ Deca, L., Harmsen, R., *Taking Stock of the Bologna Process at 20...*, cit.

the European Higher Education Area (EHEA). While the Ministerial Conference constitutes the highest political authority within the process, defining priorities and strategic orientations through ministerial communiqués, the operational management of the process is delegated to a set of permanent and semi-permanent bodies that sustain the policy cycle¹⁹.

At the centre of this architecture stands the Bologna Follow-Up Group (BFUG), which functions as the principal coordinating body of the Bologna Process between ministerial meetings. The BFUG brings together representatives of EHEA member states, the European Commission and consultative members²⁰ representing higher education stakeholders. Its functions include translating ministerial priorities into operational agendas, coordinating thematic policy work, establishing subsidiary groups and monitoring the implementation of commitments adopted at ministerial level²¹.

From an institutional perspective, the BFUG plays a role comparable to that of coordination committees within other multilevel governance systems. Although it does not possess formal legislative or executive powers, its capacity to organise work programmes and to steer policy discussions has gradually contributed to the stabilisation of governance practices within the EHEA²². In this sense, the BFUG can be interpreted as a central node of coordination within a “transnational policy network”. Supporting the BFUG is the BFUG Board, which performs an agenda-setting and coordination function. The Board prepares BFUG meetings, oversees the work of thematic groups and ensures continuity across policy cycles. This smaller body plays a crucial role in maintaining institutional coherence and facilitating communication among the different actors involved in the process²³.

The Bologna Secretariat represents another essential component of the governance architecture. Hosted on a rotating basis by the country holding the BFUG co-chairmanship, the Secretariat provides administrative and logistical support, prepares documentation, coordinates communication among participating countries and maintains institutional memory. Although its mandate is primarily technical and organisational, the Secretariat contributes significantly to the continuity and effectiveness of the governance process²⁴. In addition to these central structures, a significant share of the policy work within the Bologna Process is carried out through working groups, advisory groups and thematic initiatives established by the BFUG. These groups address specific policy priorities, including quality assurance, recognition of qualifications, the social dimension of higher education and learning and teaching. Their activities typically involve the production of analytical reports, policy recommendations and guidelines that inform subsequent ministerial decisions.

An important development in the institutional evolution of the Bologna Process occurred with the introduction of Thematic Peer Groups (TPGs) during the Italian BFUG co-chairmanship and Secretariat (2018–2020). The structure of the TPGs was proposed by Italy in its work plan adopted by the countries as a mechanism to strengthen support for the implementation of the key principles of the process (qualification framework, recognition and quality assurance) and the TPGs were designed to facilitate

¹⁹ Lažetić, P., *Managing the Bologna Process at the European level...*, cit. Bergan, S., Matei, L., *The Future of the Bologna Process and the...*, cit.

²⁰ European Higher Education Area (EHEA), *Consultative members*, <https://ehea.info/about-ehea/consultative-members/> [last accessed 9 June 2026].

²¹ European Higher Education Area (EHEA), *BFUG Rules of...*, cit.

²² Lažetić, P., *Managing the Bologna Process at the European level...*, cit.

²³ Bergan, S., Matei, L., *The Future of the Bologna Process and the...*, cit.

²⁴ European Higher Education Area (EHEA), *BFUG Rules of...*, cit.

peer learning and targeted cooperation between groups of countries working on common policy priorities. Although participation remains voluntary, the structured functioning of TPGs – which includes regular meetings, shared reporting and coordination with the BFUG – reinforces the procedural and committee-focused nature of Bologna governance. Taken together, these elements reveal a governance architecture that, while formally intergovernmental and non-binding, relies on stable institutional structures capable of sustaining policy coordination over time²⁵.

4. The Bologna Process in the Literature: Soft Law and Experimentalist Governance

The Bologna Process has frequently been analysed as a paradigmatic example of soft law governance in the European context. Soft law refers to norms, guidelines and commitments that lack formal legal binding force but nevertheless influence behaviour and policy development²⁶. Within the EHEA, ministerial communiqués, policy frameworks and shared standards play precisely this role.

As Ravinet (2008)²⁷ has shown, the Bologna Process illustrates how voluntary commitments can gradually generate expectations of compliance among participating states. Through successive ministerial meetings and monitoring exercises, governments become increasingly embedded in a shared policy framework that encourages convergence in higher education reforms.

Another important analytical perspective is offered by the literature on experimentalist governance. According to Sabel and Zeitlin (2008)²⁸, experimentalist governance systems operate through recursive cycles of goal-setting, implementation, monitoring and revision. Rather than imposing uniform rules, they rely on processes of mutual learning and adaptive policy adjustment. The Bologna Process exhibits several characteristics consistent with this model. Ministerial conferences establish broad policy goals, while national governments retain responsibility for implementation. Monitoring exercises and implementation reports generate feedback that informs subsequent policy discussions, allowing objectives to be refined and adjusted over time²⁹. However, the influence of the Bologna Process has in practice extended beyond what might normally be expected from voluntary coordination mechanisms. In several cases, Bologna commitments have provided an important reference framework for national legislative reforms in higher education, sometimes exerting a stronger policy influence than formally binding international instruments. Two main mechanisms help explain this phenomenon.

²⁵ European Higher Education Area, *Paris Communiqué*, Paris Ministerial Conference, 25 May 2018. https://ehea.info/Upload/document/ministerial_declarations/EHEAParis2018_Communique_final_952771.pdf [last accessed 9 June 2026].

European Higher Education Area, *Bologna Implementation Coordination Group – Final Report*, Rome Ministerial Conference, 2020. https://ehea2020rome.it/storage/uploads/0479534b-a889-4fd9-9d15-64b49e6ee768/BICG_Final_Report.pdf [last accessed 9 June 2026].

European Higher Education Area, *Rome Ministerial Communiqué*, Rome Ministerial Conference, 19 November 2020. https://ehea2020rome.it/storage/uploads/5d29d1cd-4616-4dfe-a2af-29140a02ec09/BFUG_Final_Draft_Rome_Communique-link.pdf [last accessed 9 June 2026].

European Higher Education Area, *Role of the BFUG Secretariat: Terms of Reference 2018–2020*, BFUG Meeting, 3 October 2018. https://ehea.info/Upload/document/bfug/63/BFUG_AU_CH_63_5_ToR_Secretariat.pdf [last accessed 9 June 2026].

²⁶ Deca, L., Harmsen, R., *Taking Stock of the Bologna Process at 20...*, cit.

²⁷ Ravinet, P., *From voluntary participation to monitored coordination: Why European countries feel increasingly bound by their commitment to the Bologna Process*, "European Journal of Education", Vol. 43, no. 3, 2008, pp. 353–367. <https://doi.org/10.1111/j.1465-3435.2008.00359.x>.

²⁸ Sabel, C. F., Zeitlin, J., *Learning from difference: The new architecture of experimentalist governance in the EU*, "European Law Journal", Vol. 14, no. 3, 2008, pp. 271–327. <https://doi.org/10.1111/j.1468-0386.2008.00415.x>.

²⁹ Harmsen, R., *Future Scenarios for the European Higher Education Area...*, cit.

First, the presence of the European Commission within the Bologna Process has created an indirect form of policy conditionality through financial instruments. EU programmes supporting higher education cooperation – most notably Erasmus+ – have frequently incorporated key Bologna objectives and policy priorities into their funding frameworks. As a result, participation in these programmes has often required countries and higher education institutions to align their policies with EHEA standards and practices. In this sense, financial incentives have reinforced the normative influence of Bologna commitments, illustrating what has been described in the literature as governance through incentives or “soft conditionality”³⁰.

Second, the monitoring mechanisms developed within the Bologna Process have generated significant reputational pressure among participating countries. Periodic implementation reports assess national progress across key policy areas using comparative indicators and visual benchmarking tools, often represented through colour-coded “traffic-light” systems ranging from red to green. These instruments make levels of implementation publicly visible and comparable across countries, thereby creating incentives for governments to avoid being perceived as lagging behind their peers. Such dynamics correspond to what scholars of European governance have described as mechanisms of peer pressure, benchmarking and “naming and shaming” within soft coordination frameworks³¹.

Through the combination of financial incentives and reputational monitoring, the Bologna Process has therefore developed mechanisms capable of encouraging compliance even in the absence of formal legal obligations. These dynamics help explain why voluntary commitments adopted within the process have often played a significant role in shaping national reforms in higher education systems. However, both soft law and experimentalist governance perspectives tend to focus primarily on policy dynamics rather than on the institutional structures that sustain coordination. As a result, the committee-centred character of the Bologna Process has received comparatively limited analytical attention. In this respect, the Bologna Process demonstrates how voluntary governance arrangements may achieve substantial policy convergence when supported by reputational monitoring mechanisms and financial incentive structures.

5. Para-Comitology as an Analytical Framework

To address the analytical gap identified in the previous sections, this article introduces the concept of para-comitology as an analytical framework for understanding the governance of the Bologna Process. The gap refers specifically to the limited attention devoted in the literature to the institutional and organisational architecture through which coordination within the European Higher Education Area (EHEA) is structured. While existing studies have successfully analysed the Bologna Process as an example of soft law governance and experimentalist policy coordination³², they have tended to focus

³⁰ Borrás, S., Jacobsson, K., *The open method of co-ordination and new governance patterns in the EU*, “Journal of European Public Policy”, Vol. 11, no. 2, 2004, pp. 185-208. <https://doi.org/10.1080/1350176042000194395>. Corbett, A., *Universities and the Europe of knowledge...*, cit.

³¹ Ravinet, P., *From voluntary participation to monitored coordination...*, cit. Zeitlin, J., *EU experimentalist governance in times of crisis*, “West European Politics”, Vol. 39, no. 5, 2016, pp. 1073-1094. <https://doi.org/10.1080/01402382.2016.1181873>.

³² Ravinet, P., *From voluntary participation to monitored coordination...*, cit. Deca, L., Harmsen, R., *Taking Stock of the Bologna Process at 20...*, cit. Harmsen, R., *Future Scenarios for the European Higher Education Area...*, cit.

primarily on policy dynamics, learning processes and voluntary cooperation mechanisms. Much less attention has been devoted to the committee-centred structures through which the process operates on a day-to-day basis.

In the European Union, comitology refers to the system of committees composed of representatives of member states that assist the European Commission in the implementation of EU legislation. These committees provide a mechanism through which national governments can exercise oversight over implementing acts adopted by the Commission and ensure the involvement of member states in the technical phases of policy implementation³³. The Bologna Process does not operate within such a legal framework. It does not produce binding implementing acts, nor does it rely on the delegation of executive powers comparable to those existing within EU law. Nevertheless, the governance architecture of the Bologna Process displays several functional similarities with committee-based governance arrangements. These similarities include the presence of stable coordinating bodies, the delegation of technical tasks to specialised groups, the reliance on expertise and peer interaction and the existence of procedural rules that structure participation and reporting. Such features suggest that the Bologna Process operates through a form of governance that resembles comitology in functional terms while remaining legally distinct.

An important step in the consolidation of this governance structure can be observed from 2018 onwards, during the Italian BFUG vice-chairmanship and Secretariat of the Bologna Process. During this period, particular attention was devoted to the systematic development and formalisation of Terms of Reference (ToR) for the various working groups, advisory groups and thematic structures operating under the Bologna Follow-Up Group. These documents defined in a more explicit and structured manner the objectives, mandates, tasks, delegated responsibilities, expected outputs and timelines of the different bodies involved in the policy cycle of the European Higher Education Area³⁴.

The increasing use of Terms of Reference represented a significant step in the proceduralisation of governance within the Bologna Process. By clarifying the scope of action, reporting obligations and expected results of the various groups, these documents contributed to strengthening both the transparency and the organisational coherence of the process. At the same time, they reinforced the perception of an internal regulatory framework structuring the work of the Bologna Process through defined mandates and procedural guidelines. From an analytical perspective, this development can be interpreted as a further stage in the institutionalisation of para-comitological governance within the EHEA. Earlier phases of the Bologna Process relied more strongly on informal coordination mechanisms and relatively flexible working arrangements. The progressive formalisation of Terms of Reference has instead contributed to consolidating a more structured internal governance logic. In this sense, the proliferation of ToR documents can be interpreted as a mechanism through which the Bologna Process has gradually developed an internal procedural order resembling committee-based governance systems, even in the absence of binding legal authority.

Building on this observation, the concept of para-comitology can be operationalised through four core analytical dimensions that characterise the governance architecture of the Bologna Process. First,

³³ Christiansen, T., Larsson, T., (eds), *The Role of Committees in the Policy-Process...*, cit. Craig, P., de Búrca, G., *EU Law: Text, Cases and...*, cit.

³⁴ European Higher Education Area, *EHEA Work Programme, Overview (2018–2020)*..., cit.

“mandate-based coordination”, whereby political objectives defined at ministerial level are translated into operational tasks through formally defined mandates assigned to working structures. Second, “delegated technical work”, carried out by specialised groups composed of national representatives and stakeholders who elaborate reports, guidelines and policy recommendations supporting the implementation of ministerial priorities. Third, “proceduralised interaction”, whereby the activities of these groups are structured through formalised procedures, reporting obligations and predefined timelines, increasingly reflected in the Terms of Reference adopted by the Bologna Follow-Up Group. Fourth, “institutional continuity”, ensured through the combined roles of the BFUG, its Board, the rotating Secretariat and the network of working groups and thematic initiatives that sustain the policy cycle between ministerial conferences.

Taken together, these elements illustrate how the Bologna Process has gradually developed a governance architecture that mirrors several characteristics of committee-centred coordination systems while remaining embedded in a voluntary and non-binding framework. The concept of para-comitology therefore captures this hybrid configuration. It refers to governance arrangements that reproduce key characteristics of committee-centred coordination – such as defined mandates, delegated technical work, structured reporting mechanisms and procedural oversight – while operating outside the framework of binding legal authority. By conceptualising the Bologna Process in this way, it becomes possible to analyse its institutional dynamics more precisely while preserving the distinction between formal legal authority and functional governance practices.

6. Functional Comparison Between EU Comitology and the Bologna Process

The analytical relevance of the concept of para-comitology becomes clearer when the governance structures of the Bologna Process are compared with the institutional features of EU comitology. While the two systems operate within fundamentally different legal frameworks, they share a number of structural and procedural characteristics that justify a functional comparison. EU comitology represents a formalised system of committee-based governance through which Member States participate in the implementation of EU legislation. Committees composed of national representatives assist the European Commission in the adoption of implementing acts, providing a mechanism of oversight and coordination between supranational and national levels of governance³⁵.

The Bologna Process, by contrast, operates within a voluntary and intergovernmental framework and does not produce binding implementing acts. Nevertheless, its governance architecture relies on a network of coordinating bodies that perform functions comparable to those of committees in other multilevel governance systems. From the perspective developed in the previous section, the governance architecture of the Bologna Process can be analysed through the four analytical dimensions of para-comitology: mandate-based coordination, delegated technical work, proceduralised interaction and institutional continuity. Each of these elements finds an institutional counterpart within the operational structures of the Bologna Process.

³⁵ Christiansen, T., Larsson, T., (eds), *The Role of Committees in the Policy-Process...*, cit. Craig, P., de Búrca, G., *EU law: Text, cases and...*, cit.

The progressive formalisation of Terms of Reference for the various working and advisory structures, particularly since the Italian BFUG vice-chairmanship and Secretariat (2018–2020), further reinforces these parallels. By defining mandates, tasks, reporting obligations and expected outputs for each group, the ToR contribute to the proceduralisation of governance within the Bologna Process. Although these instruments do not create binding legal authority, they nevertheless structure the internal functioning of the process in a way that resembles committee-based governance arrangements. The comparison between EU comitology and the Bologna Process can therefore be summarised along several key dimensions, as illustrated in Table 1.

Table 1 - Functional comparison between EU Comitology and the Bologna Process through the lens of Para-Comitology

Analytical Dimension	EU Comitology	Bologna Process (EHEA)	Para-Comitology Dimension	Interpretation for Bologna Governance
Legal foundation	Binding EU law (Art. 291 TFEU) and secondary legislation	Political commitments adopted through Ministerial Communiqués	Mandate-based coordination	Political mandates structure the work of Bologna bodies without creating formal legal obligations
Mandate and agenda setting	Legislative acts define the mandate of implementing committees	Ministerial priorities translated into BFUG work plans and group mandates	Mandate-based coordination	Policy objectives defined politically and operationalised through group mandates and Terms of Reference
Committee structures	Formal comitology committees composed of Member State representatives	BFUG working groups, advisory groups and Thematic Peer Groups (TPGs)	Delegated technical work	Technical policy elaboration delegated to specialised transnational expert groups
Procedural framework	Procedures defined by EU regulations governing comitology	Terms of Reference increasingly formalising mandates, tasks and outputs	Proceduralised interaction	Internal procedural rules structure participation, reporting and coordination
Administrative support	European Commission services acting as Secretariat	Rotating Bologna Secretariat hosted by member states	Institutional continuity	Administrative coordination ensures continuity across ministerial cycles
Policy outputs	Binding implementing acts adopted under EU law	Guidelines, reports, policy frameworks and recommendations	Delegated technical work	Soft policy instruments supporting policy convergence
Implementation mechanisms	Mandatory implementation by Member States	Voluntary national reforms monitored through implementation reports	Proceduralised interaction	Monitoring and benchmarking encourage alignment with shared objectives
Accountability mechanisms	Vertical institutional accountability within EU legal system	Peer review, benchmarking and reputational pressure among states	Institutional continuity	Horizontal accountability through monitoring and reputational incentives

Source: Author's elaboration based on Craig, P., de Búrca, G., (2020); Christiansen, T., Larsson, T., (eds), (2007), BFUG governance structures.

While the legal differences between the two systems remain substantial, the comparison highlights significant functional similarities in the way coordination is organised. Both governance systems rely on committee-like structures to translate political mandates into technical policy work and to ensure continuity in policy implementation. At the same time, the Bologna Process relies on additional mechanisms that compensate for the absence of legal enforceability. As discussed in the previous section, financial incentives associated with EU programmes such as Erasmus+ and reputational dynamics generated by monitoring reports and benchmarking exercises contribute to reinforcing compliance with Bologna commitments. These mechanisms produce what can be described as a form of de facto obligation, whereby voluntary commitments become politically binding through peer pressure, reputational considerations and access to financial resources³⁶. In this respect, the Bologna Process demonstrates how governance arrangements operating outside formal legal authority may nevertheless achieve substantial policy convergence when supported by institutionalised monitoring mechanisms and complementary financial incentives.

7. Findings and Implications for European Higher Education Governance Beyond Hard Law

This section presents the main analytical findings of the article and discusses the implications of the para-comitological interpretation of the Bologna Process for the governance of the European Higher Education Area (EHEA). This interpretation offers several insights into how governance beyond hard law operates through institutionalised procedures, peer learning, monitoring mechanisms and stable working structures. First, it demonstrates that sustained policy coordination can emerge even in the absence of binding legislation. Through institutionalised procedures, peer learning and monitoring mechanisms, the Bologna Process has fostered significant convergence among national higher education systems. The experience of the EHEA therefore illustrates how voluntary governance arrangements may achieve substantial policy alignment when supported by reputational monitoring mechanisms and financial incentive structures³⁷.

Second, the analysis highlights the importance of procedural legitimacy in governance beyond hard law. Participation in Bologna structures involves expectations of engagement, transparency and cooperation that contribute to the perceived legitimacy of policy outcomes³⁸. Through regular ministerial meetings, monitoring exercises and the work of the Bologna Follow-Up Group (BFUG) and its subsidiary bodies, the process has gradually created a shared governance framework that shapes policy development across national systems³⁹.

At the same time, the increasing institutionalisation of the Bologna Process raises several issues that deserve further reflection. Although participation in the process is formally voluntary and its outputs are not legally binding, the degree of policy convergence achieved over time suggests that

³⁶ Ravinet, P., *From voluntary participation to monitored coordination...*, cit. Borrás, S., Jacobsson, K., *The open method of co-ordination...*, cit.

³⁷ Deca, L., Harmsen, R., *Taking Stock of the Bologna Process at 20...*, cit. Cf. Brøgger, K., *Governing through Standards: The Faceless Masters of Higher Education. The Bologna Process, the EU and the Open Method of Coordination*, Springer, 2019.

³⁸ Bergan, S., Matei, L., *The Future of the Bologna Process...*, cit.

³⁹ Brøgger, K., *Governing through Standards: The Faceless Masters of Higher Education...*, cit.

Bologna commitments have acquired a form of de facto binding character within the European higher education policy space. National reforms are frequently justified with reference to Bologna commitments and governments may face reputational costs when they are perceived as lagging behind in implementation⁴⁰. This dynamic illustrates how political commitments can generate normative expectations and policy constraints that resemble those typically associated with legally binding instruments.

It should nevertheless be emphasised that, within the broader governance framework of the Bologna Process, the only formally binding legal instrument shared by participating countries is the Lisbon Recognition Convention (1997)⁴¹. Adopted under the auspices of the Council of Europe and UNESCO, this convention has been explicitly recognised by the Bologna Process as a fundamental normative pillar for the recognition of qualifications within the European Higher Education Area. While the other instruments of the Bologna Process – such as ministerial communiqués, guidelines and policy frameworks – remain non-binding political commitments, the Lisbon Recognition Convention constitutes the sole legal instrument that directly creates binding obligations for participating states within the policy domain associated with the EHEA.

A first area of reflection therefore concerns the relationship between the Bologna Process and the role of the Council of Europe (CoE) in the field of higher education governance. The Council of Europe has historically played a central role in shaping the normative foundations of European cooperation in higher education, most notably through the Lisbon Recognition Convention. At the same time, within the governance structure of the Bologna Process, the Council of Europe participates as a consultative member rather than as a full member of the decision-making framework. This institutional configuration raises questions about the relationship between the broader normative framework developed by the Council of Europe and the policy coordination mechanisms operating within the EHEA. As the Bologna Process continues to evolve, it may therefore become increasingly important to clarify the interaction between the policy initiatives of the EHEA and the legal and normative instruments developed by the Council of Europe in the field of higher education.

A second issue concerns the question of political mandate and representation within the Bologna Follow-Up Group. The BFUG and its working structures play a central role in shaping the operational agenda of the Bologna Process and in translating ministerial commitments into concrete policy initiatives. In practice, the representatives participating in these bodies often come from national administrations or specialised agencies rather than from political offices. Their work therefore contributes significantly to the formulation of policy orientations that may influence national higher education reforms. This situation raises an important question regarding the clarity and scope of the mandate under which BFUG representatives operate. While ministers formally retain responsibility for the adoption and implementation of ministerial communiqués, the technical work carried out within the BFUG and its subsidiary groups inevitably shapes the interpretation and operationalisation of these commitments. If the mandate of national representatives is not explicitly defined or clearly communicated at the political level, there is a potential risk that policy developments within the

⁴⁰ Ravinet, P., *From voluntary participation to monitored coordination...*, cit.

⁴¹ Council of Europe, UNESCO. *Convention on the recognition of qualifications...*, cit.

process may be driven primarily by administrative coordination rather than by explicit political deliberation⁴².

This issue does not necessarily undermine the legitimacy of the Bologna Process, but it highlights the importance of ensuring transparency and political awareness regarding the governance mechanisms through which the process operates. In this respect, the para-comitological interpretation proposed in this article can also serve as a useful analytical tool for reflecting on questions of accountability, representation and legitimacy within transnational governance arrangements that operate beyond formal legal authority. These considerations suggest that the Bologna Process should not only be analysed as a successful example of voluntary policy coordination, but also as an evolving governance framework that raises important questions regarding legitimacy, institutional balance and political accountability in transnational higher education governance.

8. Conclusions

This article has proposed a para-comitological reading of the Bologna Process, arguing that its governance architecture is committee-centred and functionally comparable to EU comitology while remaining legally distinct. By combining a qualitative analysis of institutional documents with a functional comparison with EU committee governance, the study has shown that the Bologna Process relies on a stabilised set of governance structures capable of sustaining policy coordination across the European Higher Education Area (EHEA).

The article has addressed a specific analytical gap in the literature. While previous studies have successfully interpreted the Bologna Process through the lenses of soft law governance, Europeanisation and experimentalist coordination, comparatively limited attention has been devoted to the organisational architecture through which these dynamics are operationalised in practice. By focusing on the Bologna Follow-Up Group (BFUG), its Board, the rotating Secretariat and the network of working, advisory and thematic groups, this article has highlighted the central role of committee-centred coordination in the everyday functioning of the process.

To capture this configuration, the article has introduced the concept of para-comitology. Rather than equating the Bologna Process with EU comitology in legal terms, para-comitology has been used here as an analytical concept to identify a form of governance characterised by four core dimensions: mandate-based coordination, delegated technical work, proceduralised interaction and institutional continuity. These dimensions make it possible to explain how a formally voluntary and non-binding process can nevertheless develop a highly structured internal governance logic.

The analysis has further shown that this logic has become more visible over time. In particular, the increasing formalisation of Terms of Reference for working groups, advisory groups and thematic structures – especially from 2018 onwards, during the Italian BFUG vice-chairmanship and Secretariat – has contributed to the proceduralisation of the Bologna Process. By explicitly defining mandates,

⁴² Ravinet, P., *From voluntary participation to monitored coordination...*, cit.

objectives, delegated responsibilities, expected outputs and timelines, these instruments have strengthened the organisational coherence of the EHEA and reinforced the interpretation of Bologna governance as an increasingly institutionalised para-comitological order.

At the same time, the article has shown that the policy impact of the Bologna Process cannot be explained solely by its internal structures. Its effectiveness has also depended on two complementary mechanisms that have transformed voluntary commitments into politically consequential ones. The first is the role of financial incentives, particularly through the presence of the European Commission and the alignment of EU funding instruments with Bologna objectives. The second is the role of reputational monitoring, especially through implementation reports and comparative benchmarking tools that publicly display the degree of national compliance. Together, these mechanisms help explain why Bologna commitments have often influenced national legislative and policy reforms more strongly than some formally binding international instruments.

In this respect, the Bologna Process demonstrates how governance arrangements operating outside formal legal authority may nevertheless achieve substantial policy convergence when supported by institutionalised monitoring mechanisms, reputational incentives and complementary financial structures. This finding is central to the broader contribution of the article: governance beyond hard law should not be understood as weak, merely informal, or politically insignificant. On the contrary, under certain institutional conditions, voluntary coordination may produce durable and meaningful policy alignment across diverse national systems.

However, the article has also shown that this success raises important questions. A first area of reflection concerns the relationship between the Bologna Process and the Council of Europe. While the Council of Europe has historically played a foundational normative role in European higher education cooperation, particularly through the Lisbon Recognition Convention, it occupies only the status of a consultative member within the institutional architecture of the Bologna Process. This creates an asymmetry between normative authority and institutional position that deserves closer analytical and political attention. In this broader framework, it should be emphasised that the Lisbon Recognition Convention remains the only formally binding legal instrument shared by participating countries and explicitly adopted as a central normative pillar of the Bologna Process. All other core Bologna instruments – ministerial communiqués, guidelines, reports and work plans – remain non-binding political commitments.

A second area of reflection concerns the issue of political mandate and representation within the BFUG. As shown in the analysis, the technical work of national representatives and specialised bodies plays a decisive role in shaping the operational agenda of the Bologna Process and, indirectly, in influencing national policy choices. This raises a question that goes beyond Bologna itself and touches on wider debates in European governance: to what extent are these representatives politically mandated to shape policy and to what extent does administrative coordination risk substituting for explicit political deliberation? This does not invalidate the legitimacy of the process, but it highlights the importance of greater transparency concerning representation, mandate and accountability within transnational governance structures.

A third and closely related area of reflection concerns the role of the European Commission within the Bologna Process. Formally, the Commission does not possess a direct mandate to harmonise national legislation in the field of education and higher education remains an area of limited EU competence. Yet, through its membership in the Bologna Process, its influence on policy agendas and its capacity to align European funding instruments with Bologna priorities, the Commission may be seen as using the process as a framework through which to legitimise and expand its role in higher education governance. This does not necessarily imply a formal transfer of competence, but it does suggest that the Bologna Process may function, at least in part, as an indirect mechanism through which the Commission supports convergence among national systems in a policy area where it could not directly impose legislative harmonisation. This point deserves particular attention, since it raises broader questions about the relationship between soft governance, institutional legitimacy and the strategic use of intergovernmental processes by supranational actors.

For these reasons, the Bologna Process should not only be analysed as a successful example of voluntary policy coordination, but also as an evolving governance framework that raises broader questions regarding legitimacy, institutional balance and political accountability in European higher education governance. The concept of para-comitology, as developed in this article, is intended to contribute to that discussion by offering a tool to analyse how governance can become increasingly structured, influential and institutionally robust even in the absence of binding legal authority.

Future research could extend this analysis in at least four directions. First, it could examine more closely how para-comitological dynamics operate in specific Bologna policy domains, such as quality assurance, recognition, or the social dimension. Second, it could explore more systematically the relationship between the Bologna Process and the Council of Europe as overlapping but institutionally differentiated sources of European higher education governance. Third, it could investigate whether similar forms of para-comitological governance can be identified in other transnational policy spaces characterised by voluntary cooperation, structured monitoring and committee-based coordination. Fourth, it could examine more directly the role of the European Commission in the Bologna Process as a possible mechanism of indirect legitimation and policy influence in a field where formal harmonising competences remain limited.

Bibliography

Bergan, S., Matei, L., *The Future of the Bologna Process and the European Higher Education Area: New Perspectives on a Recurring Topic*. *European Higher Education Area: Challenges for a New Decade*, in Curaj, A., Deca, L., Pricopie, R., (eds) *European Higher Education Area: Challenges for a New Decade*, Springer, 2020. https://doi.org/10.1007/978-3-030-56316-5_23.

Borrás, S., Jacobsson, K., *The open method of co-ordination and new governance patterns in the EU*, "Journal of European Public Policy", Vol. 11, no. 2, 2004, pp. 185-208.
<https://doi.org/10.1080/1350176042000194395>

Brøgger, K., *Governing through Standards: The Faceless Masters of Higher Education. The Bologna Process, the EU and the Open Method of Coordination*, Springer, 2019.

Christiansen, T., Larsson, T., (eds), *The Role of Committees in the Policy-Process of the European Union*, Cheltenham, Edgar Elgar Publishing, 2007.

Corbett, A., *Universities and the Europe of knowledge: Ideas, institutions and policy entrepreneurship in European Union higher education policy, 1955–2005*, Palgrave Macmillan, 2005, London. <https://doi.org/10.1057/9780230286467>

Corbett, A., *Ping-pong: Competing leadership for reform in EU higher education 1998–2006*, “European Journal of Education, Research, Development and Policy”, Vol. 46, no. 1, 2011, pp. 36-53. <https://doi.org/10.1111/j.1465-3435.2010.01466.x>

Council of Europe, UNESCO. *Convention on the recognition of qualifications concerning higher education in the European region (Lisbon Recognition Convention)*, 1997. <https://www.coe.int/en/web/higher-education-and-research/lisbon-recognition-convention> [last accessed 9 June 2026].

Craig, P., de Búrca, G., *EU Law: Text. Cases and Materials* (7th ed.), Oxford University Press, UK, 2020.

Deca, L., Harmsen, R., *Taking Stock of the Bologna Process at 20. The Possibilities and Limits of Soft Law Governance*, in Curaj, A., Deca, L., Pricopie, R., (eds.), *The European Higher Education Area: Challenges for a New Decade*, Springer, 2020. <https://doi.org/10.1007/978-3-030-56316-5>

European Higher Education Area, *EHEA Work Programme, Overview (2018–2020). Terms of reference of BFUG working structures*. <https://ehea.info/page.php?id=683> [last accessed 9 June 2026].

European Higher Education Area, EHEA. *BFUG Rules of Procedure 2021–2024*. <https://www.ehea.info> [last accessed 9 June 2026].

European Ministers of Education, *The Bologna Declaration of 19 June 1999*, <https://www.ehea.info/page-ministerial-declarations-and-communiques> [last accessed 9 June 2026].

European Higher Education Area, *BFUG Work Plan 2018–2020 – Final Reports from Advisory and Coordination Groups*, Rome Ministerial Conference, 2020. <https://ehea2020rome.it/pages/documents>. [last accessed 9 giugno 2026].

European Higher Education Area, *Role of the BFUG Secretariat: Terms of Reference 2018–2020*, BFUG Meeting, 3 October 2018. https://ehea.info/Upload/document/bfug/63/BFUG_AU_CH_63_5_ToR_Secretariat.pdf. [last accessed 9 giugno 2026].

European Higher Education Area, *Bologna Follow-Up Group Work Plan 2021–2024*, 2021. https://ehea.info/Upload/Board_PT_AN_75_DraftWorkPlan_andTORs_Annex_I%20-%20Copy%201.pdf. [last accessed 9 giugno 2026].

European Higher Education Area, *Role of the Bologna Secretariat: Terms of Reference (ToR) 2021-2024*, 2021. https://ehea.info/Upload/BFUG_PT_AD_76_4.1_bfug%20secretariat_tors_for_2021-2024.pdf [last accessed 9 giugno 2026].

European Higher Education Area (EHEA), *Consultative members*, <https://ehea.info/about-ehea/consultative-members/> [last accessed 9 giugno 2026].

European Higher Education Area, *Paris Communiqué*, Paris Ministerial Conference, 25 May 2018. https://ehea.info/Upload/document/ministerial_declarations/EHEAParis2018_Communique_final_952771.pdf [last accessed 9 giugno 2026].

European Higher Education Area, *Bologna Implementation Coordination Group – Final Report*, Rome Ministerial Conference, 2020. https://ehea2020rome.it/storage/uploads/0479534b-a889-4fd9-9d15-64b49e6ee768/BICG_Final_Report.pdf [last accessed 9 giugno 2026].

European Higher Education Area, *Rome Ministerial Communiqué*, Rome Ministerial Conference, 19 November 2020. https://ehea2020rome.it/storage/uploads/5d29d1cd-4616-4dfe-a2af-29140a02ec09/BFUG_Final_Draft_Rome_Communique-link.pdf [last accessed 9 giugno 2026].

Harmsen, R., *Future Scenarios for the European Higher Education Area: Exploring the Possibilities of “Experimentalist Governance”*, in Curaj, A., Matei, L., Pricopie, R., Salmi, J., Scott, P. (eds) *The European Higher Education Area*, Springer, 2015. https://doi.org/10.1007/978-3-319-20877-0_48.

Lažetić, P., *Managing the Bologna Process at the European level: Institution and actor dynamics*. “European Journal of Education”, Vol. 45, no. 4, 2010, pp. 549-562. <https://doi.org/10.1111/j.1465-3435.2010.01451.x>.

Ravinet, P., *From voluntary participation to monitored coordination: Why European countries feel increasingly bound by their commitment to the Bologna Process*, “European Journal of Education”, Vol. 43, no. 3, 2008, pp. 353-367. <https://doi.org/10.1111/j.1465-3435.2008.00359.x>.

Sabel, C. F., Zeitlin, J., *Learning from difference: The new architecture of experimentalist governance in the EU*, “European Law Journal”, Vol. 14, no. 3, 2008, pp. 271-327. <https://doi.org/10.1111/j.1468-0386.2008.00415.x>.

Zeitlin, J., *EU experimentalist governance in times of crisis*, “West European Politics”, Vol. 39, no. 5, 2016, pp. 1073-1094. <https://doi.org/10.1080/01402382.2016.1181873>.

Advancing Automatic Recognition Through Digital Transformation: Balancing Automation with a Human-Centric Approach

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| Abstract

The digital transformation (DT) of academic credential recognition aims to contribute to the policy goal of Automatic Recognition (AR), a long-standing commitment established through normative frameworks like the Lisbon Recognition Convention (LRC), the European Higher Education Area (EHEA) and the Council Recommendation on promoting automatic mutual recognition of qualifications and learning periods abroad. While DT provides key opportunities for efficiency, transparency, and consistency, AR itself - defined primarily as a reduction of separate recognition procedures - must be explicitly differentiated from full technological automation, a risk arising from over-reliance on digitalization.

This article first reconstructs the history of AR policies and subsequently analyzes the binding (inter) national regulations governing DT and Artificial Intelligence (AI), specifically noting that the EU AI Act classifies AI systems used in education and qualification evaluation as high-risk.

The research question addresses how DT can successfully support AR's procedural streamlining without escalating into total automation that bypasses the principles of human-centric evaluation and the mandatory requirement for human oversight imposed by international frameworks (EU, Council of Europe, UNESCO). Adopting normative document analysis and utilizing the case study of CIMEA (the Italian ENIC-NARIC center), the study identifies crucial pillars for a compliant DT strategy that effectively supports AR: Human Oversight and Accountability, Human-Centric Design, Ethics-by-Design and Quality-by-Design, Robust Data Governance and Privacy, Transparency and Explainability, and AI Literacy/Upskilling for staff.

Keywords: Digital Transformation, Automatic Recognition of qualifications, Artificial Intelligence, Academic Mobility, Internationalisation of higher education, Organizational Management.

1. Automatic Recognition, Digital Transformation and the Risk of Automation

In recent years, Automatic Recognition (AR) and digital transformation (DT) have increasingly converged within European higher education policy debates. While both are commonly associated with procedural efficiency and mobility facilitation, their interaction raises conceptual and governance questions that extend beyond technical implementation. This article examines that intersection by focusing on how digital transformation may support AR without eroding the human-centred principles on which recognition systems are built.

1.1 Automatic Recognition as a Policy Objective

Over the past decades, the rapid growth of international student mobility has progressively transformed the recognition of foreign qualifications into a central policy concern. According to recent UNESCO data, global enrolment in higher education has more than doubled since the beginning of the century – from approximately 100 million students in 2000 to around 264 million in 2025. Over the same period, international student mobility has expanded at an even faster pace, with the number of internationally mobile students tripling from about 2 million to over 6.9 million¹. As academic mobility expanded in scale and complexity, policy dialogue and cooperation were simultaneously pushing for increased transparency and comparability of qualifications, to support fast and fair recognition. In the early 2010s, the concept of AR began to emerge in Europe as a policy-oriented response aimed at reducing unnecessary procedural barriers while preserving the core principles of recognition. This trajectory found explicit institutional expression in the 2018 *Council Recommendation on promoting automatic mutual recognition of qualifications and learning periods abroad*².

This development did not occur in isolation. From the late 1980s onwards, broader geopolitical and institutional transformations in Europe contributed to framing academic mobility as a strategic dimension of European integration rather than a marginal administrative issue. Political changes across the continent, combined with the strengthening of European cooperation, intensified cross-border mobility and highlighted the need for more coherent and predictable recognition mechanisms. Early policy reflections, such as those contained in the 1985 Adonnino Report³, already emphasized academic mobility and university cooperation as essential elements of a shared European space, moving beyond a narrowly economic conception of integration.

This evolving vision was progressively consolidated through a series of landmark instruments. *The Magna Charta Universitatum* (1988)⁴ laid important normative foundations, while the *Convention on the Recognition of Qualifications concerning Higher Education in the European Region* – commonly

¹ UNESCO Institute for Statistics, *Total outbound internationally mobile tertiary students studying abroad, all countries, both sexes, 2025*. <https://data.uis.unesco.org/> [last accessed 11 February 2026].

² Council of the European Union, *Council Recommendation of the 26 November 2018 on promoting automatic mutual recognition of qualifications and learning periods abroad*, "Official Journal of the European Union", C 444/1, 2018. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018H1210\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018H1210(01)) [last accessed 11 February 2026].

³ European Parliament, *The "Adonnino Report" - Report to the European Council by the ad hoc committee "On a People's Europe"*, A 10.04 COM 85, SN/2536/3/85, 1985. <https://www.ombudsman.europa.eu/en/historical/en/4659> [last accessed 11 February 2026].

⁴ Observatory Magna Charta Universitatum, *Magna Charta Universitatum*, 1988. <https://www.magna-charta.org/magna-charta-universitatum/mcu-1988> [last accessed 11 February 2026].

known as the Lisbon Recognition Convention, or LRC (1997)⁵ – established a common framework for the fair evaluation and recognition of foreign qualifications. In parallel, the *Sorbonne Declaration* (1998)⁶ and the *Bologna Declaration* (1999)⁷ initiated a process aimed at enhancing the comparability and compatibility of higher education systems across Europe.

Although these initiatives pursue distinct objectives, they are closely interconnected. The LRC primarily focuses on establishing the principles for fair recognition, streamlining procedures and safeguarding fair assessment, whereas the Bologna Process addresses the structural and programmatic reforms of higher education systems. Together, they created the policy and implementation conditions for reducing procedural complexity and strengthening mutual trust among national systems.

Within this policy trajectory, Automatic Recognition as defined in the 2018 Council Recommendation can be understood as the outcome of a long-term effort to reconcile growing mobility with the need for efficiency, fairness, and more predictability in qualification recognition. Rather than eliminating evaluation, it reflects a shift toward minimizing procedural intervention where no substantial differences exist.

Academic literature has not extensively addressed Automatic Recognition as a distinct concept. More broadly, however, scholarship on qualification recognition has examined several related dimensions, highlighting in particular the growing globalisation of recognition frameworks, particularly in relation to UNESCO's Global Convention on the Recognition of Qualifications concerning Higher Education⁸ and its implications for the interaction between national interests and international cooperation⁹.

1.2 Digital Transformation in Qualification Recognition

A further central dimension of contemporary education policies is digital transformation. International organizations active in the education sector have increasingly framed DT as a systemic process affecting governance, infrastructure, pedagogical practices, organizational culture, and the use of data. UNESCO has articulated a comprehensive framework for the digital transformation of education structured around six interrelated pillars¹⁰. At European Union level, the *Digital Education Action Plan 2021–2027*¹¹

⁵ Council of Europe, *Convention on the Recognition of Qualifications concerning Higher Education in the European Region*, "European Treaty Series", no. 165, 1997. <https://rm.coe.int/168007f2c7> [last accessed 11 February 2026].

⁶ EHEA, *Sorbonne Joint Declaration. Joint declaration on harmonisation of the architecture of the European higher education system by the four Ministers in charge for France, Germany, Italy and the United Kingdom*, Paris 1998. https://www.ehea.info/media/ehea.info/file/1998_Sorbonne/61/2/1998_Sorbonne_Declaration_English_552612.pdf [last accessed 11 February 2026].

⁷ EHEA, *The Bologna Declaration of 19 June 1999. Joint declaration of the European Ministers of Education*, 1999. https://ehea.info/Upload/document/ministerial_declarations/1999_Bologna_Declaration_English_553028.pdf [last accessed 11 February 2026].

⁸ Pedró, F., *The Recognition of Higher Education Qualifications – The Role of Quality Assurance Systems. How Quality Assurance Systems Can Promote, and Benefit from, The Recognition of Higher Education Qualifications*, in Karakhanyan, S., Kinser, K., *II Global Trends in Tertiary Education QA. Challenges and Opportunities in Internal and External QA*, "Global Perspectives on Higher Education", 2026, pp. 81-105. https://doi.org/10.1163/9789004752115_005 [last accessed 6 May 2026].

⁹ Li, X., Turner, D., *National interests in an international organisation: an analysis of UNESCO's global convention on the recognition of qualifications concerning higher education*, "Compare: A Journal of Comparative and International Education", 2025, pp. 1-15. <https://doi.org/10.1080/03057925.2025.2602562> [last accessed 6 May 2026].

¹⁰ UNESCO, *Six pillars for the digital transformation of education. A common framework*, Paris 202. <https://unesdoc.unesco.org/ark:/48223/pf0000391299> [last accessed 11 February 2026].

¹¹ European Commission, *Digital education action plan 2021-2027. Resetting education and training for the digital age*, "Education and Training", 2020. https://education.ec.europa.eu/sites/default/files/document-library-docs/deap-communication-sept2020_en.pdf [last accessed 11 February 2026].

has positioned DT as a strategic priority, promoting the development of high-performing digital education ecosystems and undergoing a comprehensive reassessment to assess its implementation and impact. The Council of Europe has adopted the *Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law*¹², and is working on a compass for AI in education. Other organizations, such as the OECD, have extensively explored the pedagogical and organizational implications of DT in higher education, emphasizing that digital maturity and the use of advanced technologies, including generative AI,¹³ require systemic alignment with institutional capacities and professional competences rather than purely technological adoption¹⁴. Parallely, a growing body of academic literature has investigated DT across multiple dimensions of the education sector.

Within this broader context, DT has progressively assumed a more explicit role also in the field of qualification recognition. Several international and European policy instruments have highlighted the potential of digital tools to support the integrity, efficiency and interoperability of recognition processes. The Council of Europe *Recommendation on Countering Education Fraud* (2022)¹⁵ explicitly calls for the use of secure digital instruments to address fraudulent qualifications. At the same time, European initiatives promoting digital credentials¹⁶ and micro-credentials¹⁷ reflect a wider effort to improve portability, transparency and trust in qualifications through interoperable digital infrastructures. This approach is supported also in the EHEA, with the latest Tirana Communiqué signed by the 46 Ministers in charge of higher education asking to counter fraudulent practices and to consider the wider and longer-term impact of the digital transition on higher education in the EHEA, including AI.¹⁸ These developments unfold in an increasingly global recognition landscape, as reflected in the entry into force of UNESCO's *Global Convention on the Recognition of Qualifications concerning Higher Education*¹⁹, which encourages the use of contemporary digital technologies and networking activities to facilitate recognition across borders. More recently, policy debates have extended to the possible application of AI within academic and administrative processes, including recognition. *The EU Artificial Intelligence Act*²⁰ classifies AI systems used for determining access to higher education

¹² Council of Europe, *Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law*, "Council of Europe Treaty Series", no. 225, 2024. <https://rm.coe.int/1680afae3c> [last accessed 11 February 2026].

¹³ OECD, *OECD Digital Education Outlook 2026. Exploring Effective Uses of Generative AI in Education*, "OECD Publishing", Paris 2026. <https://doi.org/10.1787/062a7394-en> [last accessed 11 February 2026].

¹⁴ For further reference, please visit the OECD Higher Education Publications website at the following link: https://www.oecd.org/en/publications/higher-education_26169177.html [last accessed 12 February 2026].

¹⁵ Council of Europe, *Recommendation CM/Rec(2022)18 on countering education fraud. Recommendation CM/Rec(2022)18 and explanatory memorandum*, Strasbourg 2022. <https://rm.coe.int/ok-prems-137222-gbr-2512-cmrec-2022-18-et-expose-motifs-a5-web-1-/1680a96147> [last accessed 11 February 2026].

¹⁶ Europass, *European Digital Credentials for Learning*. Available on the website of the European Union: <https://europass.europa.eu/en/european-digital-credentials-learning> [last accessed 11 February 2026].

¹⁷ Council of the European Union, *COUNCIL RECOMMENDATION of 16 June 2022 on a European approach to micro-credentials for lifelong learning and employability*, "Official Journal of the European Union", C 243/02, 2022. Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627\(02\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627(02)) [last accessed 11 February 2026].

¹⁸ EHEA, *Tirana Communiqué*, 2024. Available on the EHEA website: <https://eha.info/Immagini/Tirana-Communique.pdf> [last accessed 11 February 2026].

¹⁹ UNESCO, *Global Convention on the Recognition of Qualifications concerning Higher Education*, Paris 1919. <https://unesdoc.unesco.org/ark:/48223/pf0000373602/PDF/373602eng.pdf.multi.page=3> [last accessed 11 February 2026].

²⁰ European Parliament and Council of the European Union, *REGULATION (EU) 2024/1689 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act)*, "Official Journal of the European Union", L series, 2024. Available on the EUR-Lex website of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1689> [last accessed 11 February 2026].

as high-risk (since they may determine the educational and professional course of a person's life and therefore may affect that person's ability to secure a livelihood, can reproduce pattern of discrimination and violate the right to education), while complementary initiatives at both European and global level have introduced governance frameworks, ethical principles and competence frameworks aimed at guiding the responsible use of AI in education. Finally, these reflections have also been taken up within the ENIC-NARIC networks²¹ and national recognition centres, where DT is increasingly discussed both as an organizational process²² and as a potential enabler for recognition-related workflows²³, including exploratory considerations regarding AI-based solutions.²⁴

1.3 The Risk of Automation

While DT is increasingly presented as an enabling factor for more efficient recognition procedures, its growing role also raises broader questions regarding the modalities through which such technologies are deployed. Beyond a simplified narrative that equates DT with efficiency gains, a substantial body of literature has highlighted how DT is characterized by structural dynamics that shape organizational processes in non-neutral ways²⁵.

In particular, DT has been shown to promote standardization and scalability as inherent drivers of organizational change. Process standardization is frequently identified as a prerequisite for successful DT, enabling internal consistency, centralized control²⁶ and scalable operations²⁷. While these features support efficiency and interoperability, they also tend to reduce bespoke human intervention and discretionary decision-making, as standardized process architectures increasingly replace context-sensitive practices. Such dynamics are not accidental, but stem from what has been described as a "standardization pathway"²⁸, whereby digital systems privilege uniformity and automation²⁹ as conditions for large-scale deployment.

At the same time, DT is closely associated with a growing reliance on data-driven and automated decision-making. Similar concerns have also been explored within the literature on algorithmic governance in

²¹ The network of 56 National information Centres on academic recognition in the European Region. The network's website can be accessed at: <https://www.enic-naric.net/> [last accessed 11 February 2026].

²² CIMEA, *Digital Transformation and Artificial Intelligence in the Recognition of Qualifications: Perspectives from CIMEA's Experience*, "DOC CIMEA", no. 144, 2025. https://www.cimea.it/Upload/Documenti/Digital_transformation_and_AI_2025.pdf [last accessed 11 February 2026].

²³ NUFFIC, *Digitalisation of credential evaluation workflows: Practical guidelines for the ENIC-NARIC Networks*, 2023. Available on the NUFFIC website: <https://www.nuffic.nl/sites/default/files/2023-09/digitalisation-of-credential-evaluation-workflows.pdf> [last accessed 11 February 2026].

²⁴ Guèye, L., Seow-Ganesan, D., Lantero, L., et al., *AI use in qualifications recognition: five key factors*, "University World News", 2025. <https://www.universityworldnews.com/post.php?story=20250109122353833> [last accessed 11 February 2026].

Lantero, L., Ferranti, L., Finocchietti, C., et al., *Artificial Intelligence and Recognition of Qualifications: Opportunities and Risks from an ENIC-NARIC Perspective*, "DOC CIMEA", no. 141, 2023. https://www.cimea.it/Upload/Documenti/Artificial_Intelligence_and_Recognition_of_Qualifications.pdf [last accessed 11 February 2026].

²⁵ Floridi, L., *On Good and Evil, the Mistaken Idea That Technology Is Ever Neutral, and the Importance of the Double-Charge Thesis*. "Philos. Technol." 36, no. 60, 2023. <https://doi.org/10.1007/s13347-023-00661-4> [last accessed 11 February 2026].

²⁶ Kirchmer, M., *Realizing Appropriate Process Standardization – Basis for Effective Digital Transformation*, in Shishkov, B. (eds) *Business Modeling and Software Design*, Springer, Cham 2023, pp. 18-31. https://doi.org/10.1007/978-3-031-36757-1_2 [last accessed 11 February 2026].

²⁷ Vendrell-Herrero, F., Para-González, L., Mascaraque-Ramírez, C., et al., *The order of the factors matters: How digital transformation and servitization integrate more efficiently*, "International Journal of Production Economics", 271, 2024. <https://www.sciencedirect.com/science/article/pii/S0925527324000859> [last accessed 11 February 2026].

²⁸ Ibid.

²⁹ Defined as "the performance by a machine (usually a computer) of a function previously performed by a human". Parasuraman, R., Sheridan, T. B., & Wickens, C. D. *A model for types and levels of human interaction with automation*, "IEEE Transactions on Systems, Man, and Cybernetics-Part A: Systems and Humans", no. 3, pp. 286-297, 2000. <https://ieeexplore.ieee.org/document/844354> [last accessed 6 May 2026].

education, which has examined the implications of AI-driven systems for institutional governance³⁰, teaching and learning³¹, as well as the related ethical challenges³². The use of large datasets and algorithmic systems can enhance speed and consistency, yet it also introduces well-documented risks related to transparency, accountability and bias. Empirical and theoretical studies have emphasized how automated decision-making systems may reproduce or amplify existing inequalities, generate discriminatory outcomes and obscure the allocation of responsibility³³. Data-intensive systems further raise concerns regarding privacy, data protection and trust, particularly in contexts where decisions affect individual rights and opportunities³⁴. Without robust data governance frameworks, the scalability and data dependence of digital solutions may result in systemic risks, including unauthorized data use, reputational damage and diminished institutional legitimacy³⁵.

In response to these challenges, the literature increasingly converges on the importance of meaningful human oversight. Rather than accesseding human involvement as a symbolic element, research highlights the role of human-in-the-loop mechanisms as a functional necessity for ensuring accountability, decision quality and ethical compliance³⁶. At the same time, studies caution that human oversight may be weakened by automation-induced reductions in professional discretion or by feedback loops in which biased algorithmic outputs shape subsequent human judgments³⁷.

1.4 Research Question

Taken together, these dynamics suggest that DT embodies structural tendencies – towards standardization, data reliance and automation – that require careful governance, particularly in domains where fairness, transparency and individual assessment are essential. These features are intrinsic characteristics of digital solutions, largely independent of the specific sector in which they are applied. At the same time, DT is increasingly advocated by international and European institutions as a key enabler for academic mobility, cross-border cooperation and the effective realization of the right to education.

Against this background, and with specific reference to AR, a critical question emerges. If DT is to support the procedural streamlining envisaged by AR, it must do so without undermining the human-centric principles on which recognition is founded. The challenge, therefore, is not whether DT should be applied to qualification recognition, but how it can be implemented in a way that remains sustainable,

³⁰ Wang, Y., *Algorithmic decisions in education governance: implications and challenges*, "Discov Educ", no. 3, 2024. <https://doi.org/10.1007/s44217-024-00337-x> [last accessed 7 May 2026].

³¹ Enăchescu, V., *Algorithmic Governance in Education: A Bibliometric and Critical Analysis of Artificial Intelligence Integration in Teaching and Learning Systems*, "International Journal of Education, Leadership, Artificial Intelligence, Computing, Business, Life Sciences, and Society", no. 6, pp. 48-64, 2026. <https://doi.org/10.65222/VIRAL.2026.3.21.41> [last accessed 7 May 2026].

³² Madleňák, R., Madleňáková, L., Cvacho, V., et al., *Ethical Challenges of Artificial Intelligence in Higher Education: A Four-Pillar Student-Activity Framework for Institutional Governance*. "Educ. Sci" 555, no. 16, 2026. <https://doi.org/10.3390/educsci16040555> [last accessed 7 May 2026].

³³ Giacomini, C., Aprilis, C., *Digital Discrimination. The Challenge of Bias and Transparency in AI*, "Lessico di etica pubblica", no. 1, 2024: https://www.eticapubblica.it/wp-content/uploads/2025/02/04_-LEPI-24_Giacomini-e-Aprilis.pdf [last accessed 11 February 2026].

³⁴ Mirmiran, F., *Data Privacy Concerns: How AI Is Changing the Landscape of Personal Information*, Zenodo, 2024. <https://doi.org/10.5281/zenodo.13822481> [last accessed 11 February 2026].

³⁵ Vital Bernardo, B.M., São Mamede, H., Pereira Barroso, J.M., et al., *Data governance & quality management—Innovation and breakthroughs across different fields*, "Journal of Innovation & Knowledge" 9, no. 4, 2024. <https://doi.org/10.1016/j.jik.2024.100598> [last accessed 11 February 2026].

³⁶ European Parliament, *Digitalisation, artificial intelligence and algorithmic management in the workplace: Shaping the future of work*, "European Parliamentary Research Service", PE 774.670, 2025. [https://www.europarl.europa.eu/RegData/etudes/STUD/2025/774670/EPRS_STU\(2025\)774670_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2025/774670/EPRS_STU(2025)774670_EN.pdf) [last accessed 11 February 2026].

³⁷ Huang, B., Niyomsilp, E., *The impact of artificial intelligence on organizational decision-making processes*, "Edelweiss Applied Science and Technology" 9, no. 4, 2025. <https://doi.org/10.55214/25768484.v9i4.6081> [last accessed 11 February 2026].

fair and aligned with the fundamental objectives of recognition policies.

This article addresses this challenge by investigating the following research question: How can digital transformation successfully support AR's procedural streamlining without escalating into total automation?

In so doing, the article aims to contribute a conceptual framework for understanding how efficiency-oriented digital solutions can be reconciled with human-centric recognition practices.

2. Methodological Approach

This study adopts a qualitative, normative-oriented methodological approach, combining policy document analysis with empirical grounding derived from institutional practice. The analysis is designed to reconstruct the evolution of AR as a policy objective and to examine how contemporary regulatory frameworks governing DT and AI shape its implementation.

2.1 Normative and Policy Document Analysis

The core of the analysis is based on a desk reaccessed of primary normative and policy documents that constitute the foundation of AR and of regulatory approaches to DT in education. The study relies on official texts, including conventions, ministerial declarations, communiqués and legally binding or policy-guiding instruments adopted at European and international level.

With regard to AR, five foundational sources have been selected. These include the *Sorbonne Declaration* and the *Bologna Declaration*, which laid the groundwork for the creation of the European Higher Education Area (EHEA) and articulated the central role of European integration and cooperation in higher education. The EHEA ministerial communiqués, which punctuate and operationalize the Bologna Process in its more than 25 years of existence, have been analyzed to trace the progressive consolidation of recognition-related policy objectives. In addition, the LRC has been examined as the primary legal framework governing fair recognition across Europe. The Council of the European Union's Recommendation on Automatic Recognition has also been considered as a key policy instrument.

With regard to DT and AI, the analysis draws on a selection of foundational regulatory and policy documents at both European Union and international level. At EU level, the *General Data Protection Regulation (GDPR)*³⁸, the *Cybersecurity Act*³⁹, the *Interoperable Europe Act*⁴⁰ and the *EU AI Act* have

³⁸ European Parliament and Council of the European Union, *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)*, "Official Journal of the European Union", L 119/1, 2016. <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng> [last accessed 11 February 2026].

³⁹ European Parliament and Council of the European Union, *Regulation (EU) 2019/881 of the European Parliament and of the Council of 17 April 2019 on ENISA (the European Union Agency for Cybersecurity) and on information and communications technology cybersecurity certification and repealing Regulation (EU) No 526/2013 (Cybersecurity Act)*, L 151/15, 2019. <https://eur-lex.europa.eu/eli/reg/2019/881/oj/eng> [last accessed 11 February 2026].

⁴⁰ European Parliament and Council of the European Union, *Regulation (EU) 2024/903 of the European Parliament and of the Council of 13 March 2024 laying down measures for a high level of public sector interoperability across the Union (Interoperable Europe Act)*, L series, 2024. <https://eur-lex.europa.eu/eli/reg/2024/903/oj/eng> [last accessed 11 February 2026].

been examined as core instruments shaping the legal and governance conditions under which digital public services – including recognition processes – may operate.

At international level, the analysis considers the UN Sustainable Development Goals (in particular SDG 4 on quality education), UNESCO's *Six Pillars for the Digital Transformation of Education*, UNESCO's *Guidance for Generative AI in Education and Research*, and the Council of Europe's *Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law*. These documents have been selected as they articulate systemic, human-centred and rights-based approaches to DT and AI governance in education.

The analysis proceeds by putting into relation the intrinsic features of DT identified in Section 1.3 with the defining elements of AR reconstructed in Section 3. This relational step is not intended to assess empirical implementation outcomes, but to identify structural tensions and points of friction that emerge when efficiency-oriented digital logics intersect with rights-based recognition principles. Lastly, the European and international regulatory frameworks analysed in Section 4 are used as a normative lens to assess how these tensions are currently framed, constrained and governed at policy level.

2.2 Role of the CIMEA Case as Empirical Grounding

In addition to normative analysis, the study draws on selected references to the experience of CIMEA, the Italian ENIC-NARIC centre. CIMEA was selected due to its experience in both researching and applying digital solutions within qualification recognition workflows. However, CIMEA is not treated as a standalone case study, nor as an object of evaluative analysis. Rather, its role is to provide empirical grounding for selected dynamics, challenges and principles emerging from the normative framework. In particular, references to CIMEA are used to illustrate concrete examples of how human and technological components may interact in support of Automatic Recognition processes, including in contexts where digital streamlining coexists with case-by-case assessment, human oversight and institutional dialogue.

3. Automatic Recognition: Policy Evolution and Underlying Principles

This section reconstructs how AR has progressively emerged as a policy objective within the broader European architecture for academic mobility. The aim is to identify the core elements that have shaped AR over time so as to clarify what AR is intended to achieve and which principles it presupposes.

3.1 From the Lisbon Recognition Convention to the Council Recommendation

The policy trajectory leading to AR builds on two intertwined developments: the consolidation of fair recognition principles through the LRC and the gradual harmonization and transparency tools promoted through the Bologna Process and the EHEA.

Adopted in 1997, the LRC provided the central legal and normative framework for fair recognition of qualifications across the European region. Rather than introducing entirely new principles, the LRC codified procedural guarantees: the right to access recognition procedures, non-discrimination, transparency and consistency of assessment, and the idea that recognition may be refused only where

a substantial difference can be demonstrated (with the burden of proof on the recognition authority). The Convention also emphasized the role of reliable information for decision-making and promoted supporting instruments such as the Diploma Supplement, while establishing national information centres (ENICs) to facilitate system transparency and cross-border cooperation. Over time, the ENIC-NARIC networks and the LRC Committee (and its subsidiary texts) reinforced a shared professional and policy space around recognition, including guidance and implementation instruments and practice on specific contexts.

In parallel, the Bologna Process – initiated by the Sorbonne Declaration and the Bologna Declaration – pursued the comparability and compatibility of higher education systems as a structural condition for mobility. The progressive consolidation of Bologna “key commitments” (three-cycle structure, ECTS, national and overarching qualifications frameworks, learning outcomes, recognition of qualifications in line with the LRC, and quality assurance standards through the ESG) strengthened transparency and mutual trust, thereby reducing uncertainty and procedural frictions in recognition. The establishment of the EHEA in 2010⁴¹ marked a turning point by foregrounding procedural streamlining in recognition as a specific policy priority.

The concept of Automatic Recognition entered the EHEA agenda explicitly in the Bucharest Communiqué (2012)⁴², which committed countries to work “towards the automatic recognition of comparable academic degrees” as a long-term goal, explicitly “building on the tools of the Bologna framework” and reaffirming compliance with LRC principles. Because “automatic recognition” was not yet defined, an EHEA Pathfinder Group was tasked with clarifying its meaning and possible pathways. Its subsequent work contributed a first shared formulation of AR as a level-based entitlement related to access to the next cycle of studies, and stressed that recognition procedures across the EHEA were often still burdensome and unevenly aligned with LRC principles⁴³. The Yerevan Communiqué (2015)⁴⁴ further consolidated AR as a policy commitment and framed it more explicitly as recognition “at the same level” as domestic qualifications, while later communiqués reiterated the goal and anchored it to Bologna instruments (including ECTS implementation, and recalling recognition guidance such as the EAR Manual and quality assurance and transparency tools such as the DEQAR database)⁴⁵.

A decisive institutional step followed in 2018 at EU level with the Council of the European Union’s *Recommendation on promoting automatic mutual recognition of qualifications and learning periods abroad*. The Recommendation provided the most explicit and comprehensive policy definition of AR to date and extended the scope beyond higher education degrees to include upper secondary

⁴¹ EHEA, *Budapest-Vienna Declaration on the European Higher Education Area*, 2010. Available on the EHEA website: https://ehea.info/media.ehea.info/file/2010_Budapest_Vienna/64/0/Budapest-Vienna_Declaration_598640.pdf [last accessed 11 February 2026].

⁴² EHEA, *Making the Most of Our Potential: Consolidating the European Higher Education Area. Bucharest Communiqué*, 2010. Available on the EHEA website: https://www.ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf [last accessed 11 February 2026].

⁴³ EHEA, *Report by the EHEA Pathfinder Group on Automatic Recognition. To present to Ministers of the European Area of Higher Education for the Bologna Ministerial Conference 14-15 May 2015 in Yerevan, Armenia*, 2015. Available on the EHEA website: https://www.ehea.info/media.ehea.info/file/2015_Yerevan/72/3/EHEA_Pathfinder_Group_on_Automatic_Recognition_January_2015_613723.pdf [last accessed 11 February 2026].

⁴⁴ EHEA, *Yerevan Communiqué*. Available on the EHEA website: https://www.ehea.info/media.ehea.info/file/2015_Yerevan/70/7/YerevanCommuniquéFinal_613707.pdf [last accessed 11 February 2026].

⁴⁵ NUFFIC, *EAR Manual 2023*, 2023. Available on the NUFFIC website https://www.nuffic.nl/sites/default/files/2023-08/1.%20EAR%20Manual%202023_2nd%20edition.pdf [last accessed 11 February 2026].

qualifications (for access to higher education) and learning periods abroad⁴⁶. Subsequent EHEA communiqués continued to reaffirm AR, increasingly linking it to enabling conditions such as quality assurance information and to the integrity dimension of recognition, including authenticity verification. By the time of the Tirana Communiqué (2024) and as of the time of writing, AR remains a reiterated objective alongside renewed emphasis on LRC implementation and the continued development and use of EHEA recognition tools.

3.2 Automatic Recognition as Procedural Streamlining

Across its policy evolution, AR is best understood as a form of procedural streamlining rather than as the elimination of evaluation. Its meaning emerges at the intersection of structural conditions that enable comparability and the rights-based recognition principles laid down in the LRC.

From a structural perspective, AR is level-based, relying on qualifications frameworks and transparency tools to support comparability across systems. The “automatic” dimension refers to the presumption that a qualification at a given level should be treated as comparable to a domestic qualification at the same level, thereby enabling progression to the next level of studies without the need for a separate recognition procedure. At the same time, AR concerns access rather than admission: holders of foreign qualifications must be considered for entry under the same conditions as domestic candidates, while institutions retain the right to apply programme-specific admission criteria. Moreover, AR explicitly preserves essential integrity safeguards, including authenticity verification and confirmation of access rights in the country of origin, in order to protect system quality and genuine students.

In continuity with the LRC, AR also rests on a rights-based conception of recognition. In this sense, AR reinforces the principle that recognition should be the default outcome in the absence of substantial differences relevant to the purpose of recognition, and aligns with broader policy commitments to widening access to education, including the objectives underpinning SDG 4 (Quality Education)⁴⁷.

Taken together, these elements highlight the dual nature of AR. While it aims to minimise procedural burdens, it necessarily coexists with some procedural requirements – such as authenticity checks, admission decisions and case-by-case assessments in non-standard situations – that cannot be eliminated without undermining fairness and accountability. It is precisely in this context that digital technologies are increasingly presented as a potential means of further streamlining recognition. However, because these steps touch directly upon individual rights and evaluative judgement, the analysis must now turn to the European and international regulatory frameworks governing DT and AI.

⁴⁶ The recommendation defines AR as «the right for holders of a qualification of a certain level that has been issued by one Member State to be considered for entry to a higher education programme in the next level in any other Member State, without having to go through any separate recognition procedure. This shall not prejudice the right of a higher education institution or the competent authorities to set specific evaluation and admission criteria for a specific programme. It does not prejudice the right to check, if the qualification is authentic and, in case of an upper secondary education and training qualification, if it really gives access to higher education in the Member State of issuance or, in duly justified cases, if the granted qualification meets the requirements for accessing a specific higher education programme in the receiving Member State». Council of the European Union, *Council Recommendation of the 26 November 2018...* cit., p. 6.

⁴⁷ The Global Goals, *Quality Education*. Available on The Global Goals website: <https://www.globalgoals.org/goals/4-quality-education/> [last accessed 11 February 2026].

4. Digital Transformation and AI in Qualification Recognition: Regulatory Framework

The regulatory landscape at global and European levels frames DT and AI as potentially enabling, yet subject to strict conditions related to fundamental rights, accountability, transparency, data governance, and human oversight. These frameworks provide the normative constraints within which technology can legitimately support recognition processes.

4.1 The EU Regulatory Framework

At EU level, the regulatory framework relevant to DT in qualification recognition is not defined by a single “digital transformation law”, but by a set of interlocking instruments that regulate the core enabling conditions of digitalised public services: lawful data processing, secure infrastructures, and interoperable cross-border exchanges.

First, the *General Data Protection Regulation (GDPR)* sets the baseline for any DT that relies on personal data. It governs the lawful, fair, and transparent processing of data, requiring purpose limitation, data minimisation, appropriate security measures, and enforceable data subject rights. In recognition contexts, GDPR is directly relevant because streamlining often depends on increasing data reuse and data sharing; these benefits must remain compatible with information duties toward individuals and safeguards around profiling and automated processing.

Second, EU cybersecurity policy – most notably the *Cybersecurity Act* and the certification approach it enables – supports the security and resilience of digital services and infrastructures. This is central for recognition ecosystems that increasingly rely on digital channels for document transmission and verification, and institutional communication. By promoting risk-based certification schemes and strengthening the role of ENISA (the EU Agency for cybersecurity), the framework reinforces trust in the technical layer of DT, which is a prerequisite for scaling secure recognition-related services across borders.

Third, the *Interoperable Europe Act* addresses the organisational and technical reality of cross-border digitalisation: DT in the public sector requires common interoperability practices, shared solutions, and structured cooperation among administrations. By supporting reusable interoperability solutions and introducing mandatory interoperability assessments (under proportionality safeguards), the Act directly aligns with recognition streamlining goals – particularly where procedures depend on cross-border exchange of structured information and on the reuse of trusted digital building blocks. Its coordination with GDPR and the AI Act also signals that interoperability must be achieved within a rights- and risk-governed environment.

The *EU Artificial Intelligence Act* provides a sector-relevant specification where DT involves AI systems with heightened impact on individuals. In education and training, the Act classifies as high-risk several AI uses linked to access/admission, evaluation, and monitoring, and mandates requirements such as risk management, data quality, documentation and traceability, transparency, human oversight, robustness and cybersecurity. Two provisions are particularly consequential for recognition-related workflows where AI may be used: the obligation to conduct fundamental rights impact assessments

prior to deployment of high-risk systems and the requirement to ensure AI literacy among staff involved in operating or overseeing such systems. Together, these instruments make clear that DT in recognition operates within a rights- and risk-governed framework: digital solutions may support streamlining, but only under enforceable constraints relating to data protection, security, interoperability and AI-specific safeguards.

4.2 Normative Framework at the Global Level

Similarly, at global level DT in education is framed primarily as a systemic reform process aimed at improving access, equity and quality. International organisations increasingly converge on the idea that technology can support educational systems only if embedded in coherent governance structures, aligned with human-centred values and with the objectives of SDG 4 (Quality Education for All).

Within this perspective, UNESCO's *Six pillars for the digital transformation of education: A common framework* articulates a comprehensive, human-centred approach structured around six interrelated pillars: coordination and leadership; capacity and culture; cost and sustainability; content and solutions; connectivity and infrastructure; and data and evidence. The framework stresses the need for strategic coordination, sustainable investment, institutional capacity-building and responsible data use as enabling conditions. Emphasis is placed on equity, inclusiveness and the risk of exacerbating existing digital divides if transformation efforts are driven primarily by efficiency or scalability considerations. Data systems and interoperability are recognised as key enablers, but only insofar as they are governed in ways that ensure privacy, security and accountability.

This vision is complemented by UNESCO's *Guidance for generative AI in education and research*⁴⁸, which explicitly situates AI within the broader DT agenda. It acknowledges both the transformative potential of generative AI and the regulatory and institutional unpreparedness that currently characterises many education systems. It therefore advocates a human-centred and ethics-by-design approach, calling for strengthened data protection, clear governance and accountability across actors, transparency and explainability of AI systems, and sustained investment in digital and AI-related competencies. Crucially, the guidance frames AI not as a substitute for human judgement, but as a tool whose deployment must preserve human agency, pedagogical integrity and social interaction, particularly where decisions affect learners' educational trajectories.

The Council of Europe *Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law* provides a binding international reference for the governance of AI systems across sectors, including education. The Convention establishes cross-cutting obligations that are directly relevant to digitally transformed recognition processes: non-discrimination, protection of human dignity, transparency, accountability, risk assessment and mitigation across the AI lifecycle, and the requirement for human oversight. It also mandates independent oversight mechanisms and access to remedies for individuals affected by AI-related harms. Importantly, the Convention frames AI governance as complementary to existing international human rights standards, rather than as a self-contained technical regime.

⁴⁸ UNESCO, *Guidance for generative AI in education and research*, Paris 2023. <https://unesdoc.unesco.org/ark:/48223/pf0000386693> [last accessed 11 February 2026].

5. A Human-Centric Framework for Digital Transformation Supporting Automatic Recognition

Building on this normative and analytical backdrop, the following section brings together the main strands of the argument. Building on the characteristics of AR (Section 3) and on the structural dynamics of DT and its regulatory framing (Sections 1.3 and 4), it identifies a set of conceptual tensions that emerge when digital solutions are mobilised in support of recognition procedures. These tensions do not reflect contradictions between recognition policies and digital regulation, but rather potential misalignments between the objectives of AR and the intrinsic logics of DT. Making these tensions explicit provides the basis for outlining a set of design pillars aimed at supporting AR in a sustainable and human-centric manner.

5.1 Conceptual Tensions in the Digital Transformation of Automatic Recognition

A first area of tension concerns the relationship between procedural streamlining and the persistence of case-by-case assessment. AR seeks to minimise recognition procedures where qualifications are comparable and no substantial differences exist, relying on transparency tools or databases⁴⁹, qualifications frameworks and shared trust among systems. DT appears, at first glance, to align seamlessly with this objective, as standardised digital infrastructures can support level-based presumptions and reduce repetitive administrative steps. In practice, however, recognition systems continue to encounter categories of cases that cannot be fully resolved through standardisation alone, such as non-linear learning pathways, as well as, in some cases, pre-Bologna qualifications or qualifications originating from structurally different education systems. In these situations, individual assessment remains necessary to preserve fairness and coherence with recognition principles. Digital tools may support this process by improving access to information, but they do not eliminate the need for contextual judgement. Rather than replacing case-by-case evaluation, DT tends to redraw its boundaries, concentrating discretionary assessment within a narrower – but still essential – set of cases.

A related tension emerges with regard to decision-making authority and accountability. While AR aims to simplify procedures, it does not alter the allocation of responsibility for recognition decisions, which remains anchored in legal and institutional frameworks. In academic recognition, final decisions typically rest with higher education institutions, reflecting both legal mandates and the autonomy of institutions in defining admission criteria. Digital systems can streamline workflows, support evaluative processes and facilitate communication between actors, yet they cannot assume responsibility for decisions that have direct legal and educational consequences for individuals. If not carefully governed, such developments risk blurring the distinction between procedural support and substantive decision-making, potentially weakening accountability. At the same time, empirical practice shows that even highly digitalised recognition processes continue to embed mechanisms for human judgement, dialogue and appeal, underscoring that streamlining does not equate to delegating final decisions to technical systems⁵⁰.

⁴⁹ See for example the Automatic Recognition Database Italia (ARDI), available at: <https://ardi.cimea.it/en>

⁵⁰ A practical illustration of this approach can be found in the ongoing interaction between national recognition centres and HEIs. In the Italian context, CIMEA combines the development of digital tools and databases aimed at supporting recognition procedures with continuous human-mediated interaction with HEIs. Alongside digital infrastructures designed to streamline access to information and orientation, structured channels of communication and dialogue are maintained to support institutions in individual recognition cases and admission decisions. This combination reflects an understanding of digital transformation as an enabling layer rather than as a substitute for human judgement in recognition processes.

A third tension relates to the growing reliance on data as a foundation for efficiency, trust and interoperability. DT in recognition increasingly depends on structured data, shared databases and digital platforms to support comparability and verification. This data-centric approach can enhance transparency and reduce duplication, particularly where public and system-level information is concerned. However, recognition processes also involve the handling of sensitive personal data, including educational histories and identity-related information, which directly engage individual rights to privacy and data protection. The deeper digital tools intervene in individual recognition cases, the more stringent become the requirements for lawful processing, governance and trust. Distinctions therefore emerge between digital infrastructures that operate on publicly available information to support orientation and presumption, and platforms that process personal data to enable individual evaluations.

Considered together, these tensions highlight the conditions under which DT can meaningfully support AR. They show that streamlining cannot be pursued in isolation from the legal, procedural and rights-based features that structure recognition practices.

5.2 *The Design Pillars of a Sustainable Approach to Automatic Recognition*

In response to these tensions, this section formulates six design pillars that translate existing regulatory principles into operational orientations for digitally supported recognition. These design pillars do not prescribe particular technologies, but establish the conditions under which digital tools may be coherently integrated into recognition processes.

A first design pillar concerns human-centric design, which responds directly to the tension between procedural standardisation and case-by-case fairness. Regulatory and policy frameworks consistently acknowledge that digital systems may rely on standardised logics, but must retain the capacity to accommodate non-standard cases. Human-centric design therefore requires that digitally supported recognition processes remain adaptable, allowing exceptions, contextual interpretation and individualized assessment where qualifications do not fit predefined patterns. This pillar aligns with the LRC's emphasis on individual entitlement to fair assessment and with human-centred approach to DT.

Closely connected is the design pillar of human oversight and accountability, which addresses the tension between procedural streamlining and accountable judgement. Across both EU and international frameworks, a consistent boundary is drawn between technical support and decision-making authority. The AI Act, the Council of Europe AI Convention and UNESCO guidance all stress that decisions affecting educational access and progression must remain attributable to human actors and subject to responsibility, reassessed and redress. Applied to AR, this pillar reinforces that digital systems may support evaluation and orientation, but cannot replace institutional or legally competent decision-makers.

Within this same tension, transparency and explainability emerge as a distinct yet complementary design pillar. Transparency concerns the intelligibility of procedures, criteria and data use, while explainability relates to the ability to understand how specific outcomes are produced. Together, they ensure that digitally supported recognition decisions remain justifiable and contestable, enabling dialogue, appeal and institutional trust. This pillar reflects AI Act transparency requirements and broader human rights standards that safeguard the right to an effective remedy. In recognition contexts,

transparency and explainability are essential to prevent digital streamlining from obscuring evaluative reasoning or weakening procedural guarantees.

Meaningful human oversight, however, presupposes adequate institutional capacity too. For this reason, AI literacy and upskilling for staff constitute a further design pillar, particularly relevant where advanced digital tools are introduced. Regulatory frameworks increasingly recognise that human involvement risks becoming nominal if staff lack the competencies needed to understand, question and intervene in technologically mediated processes. The AI Act's explicit reference to AI literacy, together with UNESCO's emphasis on capacity-building, highlights that professional expertise must evolve alongside digital systems. In the field of recognition, this pillar supports informed discretion and prevents automation bias from reshaping human judgement in unexamined ways.

A separate but equally central design concern is robust data governance and privacy, which responds to the tension between data-driven efficiency and rights, privacy and trust. Recognition processes necessarily rely on sensitive personal and educational data, and DT often amplifies data reuse, interoperability and verification. GDPR, cybersecurity frameworks and UNESCO's guidance for generative AI in education and research converge in requiring that such data practices remain purpose-limited, secure and transparent, with clear safeguards against misuse.

Finally, ethics-by-design and quality-by-design operate as transversal design pillars, underpinning all the dimensions discussed above. Rather than constituting a standalone requirement, they embed fairness, proportionality, reliability and accountability across the entire lifecycle of digitally supported recognition processes. This transversal role reflects both UNESCO's ethics-by-design approach and the Council of Europe's framing of AI governance as complementary to existing human rights obligations. In the context of AR, ethics- and quality-by-design ensure coherence between procedural streamlining and the substantive values that recognition policies are intended to uphold.

Table 1 - Conceptual Tensions in Digital Transformation and Corresponding Design Pillars for Automatic Recognition

Conceptual tension	Design pillar	Function
A. Procedural standardisation vs case-by-case fairness	Human-Centric Design	Preserves contextual evaluation and the handling of non-standard cases within streamlined recognition procedures
B. Streamlining vs accountable human judgement	Human Oversight and Accountability	Ensures that recognition decisions remain imputable to human authorities and subject to responsibility and reaccessed
B. Streamlining vs accountable human judgement	Transparency and Explainability	Makes decision-making pathways intelligible, justifiable and contestable, enabling appeal, reaccessed and accountability
B. Streamlining vs accountable human judgement	AI Literacy and Upskilling for Staff	Enables informed and meaningful human oversight, preventing symbolic or nominal human involvement in automated workflows
C. Data-driven efficiency vs rights, privacy and trust	Robust Data Governance and Privacy	Aligns data-intensive recognition processes with data protection, purpose limitation and trust-based institutional safeguards
All (A, B, and C)	Ethics-by-Design and Quality-by-Design	Embeds fairness, proportionality, reliability and accountability across all stages of digitally supported recognition processes

6. Conclusion

The analysis suggests that the risk of automation does not stem from technology per se, but from interpretative shortcuts that conflate streamlining with automation and correspondence with uniformity. As articulated in European policy, AR is neither a purely technical nor a fully automated process: it presupposes trust between systems, a presumption of level correspondence, and the persistence of residual procedures that safeguard fairness and integrity.

Against this backdrop, the six design pillars proposed in this article translate existing regulatory and policy constraints into practical orientations for digitally supported recognition. They do not introduce new normative obligations, but systematise requirements already embedded in European and international frameworks on data protection, AI, interoperability and human rights, outlining a model of DT that is enabling rather than substitutive: technology supports recognition processes while responsibility, judgement and accountability remain human.

Finally, this study also presents limitations and avenues for further research. Firstly, the analysis is primarily conceptual and normative, and does not assess specific technological implementations in a systematic way. Future research could therefore examine how the identified tensions and design pillars materialise in concrete recognition workflows, including the use of databases, digital infrastructures and AI-assisted tools. Secondly, it addresses the recognition of final qualifications, and it does not explore the role of DT in the recognition of partial qualifications, periods of study, skills, prior learning and non-formal and informal learning. The possibility to streamline forms of scalability of recognition in this context, while preserving a rights-based and a case-by-case approach, represents a vast and interesting area for further research. Moreover, while the focus on AR justifies a European scope, further work could explore how similar tensions emerge in non-European recognition contexts.

Bibliography

CIMEA, *Digital Transformation and Artificial Intelligence in the Recognition of Qualifications: Perspectives from CIMEA's Experience*, "DOC CIMEA", no. 144, 2025. https://www.cimea.it/Upload/Documenti/Digital_transformation_and_AI_2025.pdf [last accessed 11 February 2026].

Council of Europe, *Convention on the Recognition of Qualifications concerning Higher Education in the European Region*, "European Treaty Series", no. 165, 1997. <https://rm.coe.int/168007f2c7> [last accessed 11 February 2026].

Council of Europe, *Recommendation CM/Rec(2022)18 on countering education fraud. Recommendation CM/Rec(2022)18 and explanatory memorandum*, Strasbourg 2022. <https://rm.coe.int/ok-prems-137222-gbr-2512-cmrec-2022-18-et-expose-motifs-a5-web-1-/1680a96147> [last accessed 11 February 2026].

Council of Europe, *Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law*, "Council of Europe Treaty Series", no. 225, 2024. <https://rm.coe.int/1680afae3c> [last accessed 11 February 2026].

Council of the European Union, *Council Recommendation of the 26 November 2018 on promoting automatic mutual recognition of qualifications and learning periods abroad*, "Official Journal of the European Union", C 444/1, 2018. [http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018H1210\(01\)](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018H1210(01)) [last accessed 11 February 2026].

Council of the European Union, *COUNCIL RECOMMENDATION of 16 June 2022 on a European approach to micro-credentials for lifelong learning and employability*, "Official Journal of the European Union", C 243/02, 2022. Available on the EUR-Lex website of the European Union. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627\(02\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627(02)) [last accessed 11 February 2026].

EHEA, *Budapest-Vienna Declaration on the European Higher Education Area*, 2010. Available on the EHEA website: https://ehea.info/media.ehea.info/file/2010_Budapest_Vienna/64/0/Budapest-Vienna_Declaration_598640.pdf [last accessed 11 February 2026].

EHEA, *Making the Most of Our Potential: Consolidating the European Higher Education Area. Bucharest Communiqué*, 2010. Available on the EHEA website: https://www.ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf [last accessed 11 February 2026].

EHEA, *Report by the EHEA Pathfinder Group on Automatic Recognition. To present to Ministers of the European Area of Higher Education for the Bologna Ministerial Conference 14-15 May 2015 in Yerevan, Armenia*, 2015. Available on the EHEA website: https://www.ehea.info/media.ehea.info/file/2015_Yerevan/72/3/EHEA_Pathfinder_Group_on_Automatic_Recognition_January_2015_613723.pdf [last accessed 11 February 2026].

EHEA, *Sorbonne Joint Declaration. Joint declaration on harmonisation of the architecture of the European higher education system by the four Ministers in charge for France, Germany, Italy and the United Kingdom*, Paris 1998. https://www.ehea.info/media.ehea.info/file/1998_Sorbonne/61/2/1998_Sorbonne_Declaration_English_552612.pdf [last accessed 11 February 2026].

EHEA, *The Bologna Declaration of 19 June 1999. Joint declaration of the European Ministers of Education*, 1999. https://ehea.info/Upload/document/ministerial_declarations/1999_Bologna_Declaration_English_553028.pdf [last accessed 11 February 2026].

EHEA, *Tirana Communiqué*, 2024. Available on the EHEA website: <https://ehea.info/Immagini/Tirana-Communique.pdf> [last accessed 11 February 2026].

EHEA, *Yerevan Communiqué*. Available on the EHEA website: https://www.ehea.info/media.ehea.info/file/2015_Yerevan/70/7/YerevanCommuniqueFinal_613707.pdf [last accessed 11 February 2026].

Enăchescu, V., *Algorithmic Governance in Education: A Bibliometric and Critical Analysis of Artificial Intelligence Integration in Teaching and Learning Systems*, "International Journal of Education, Leadership, Artificial Intelligence, Computing, Business, Life Sciences, and Society", no. 6, pp. 48-64, 2026. <https://doi.org/10.65222/VIRAL.2026.3.21.41> [last accessed 7 May 2026].

Europass, *European Digital Credentials for Learning*. Available on the website of the European Union: <https://europass.europa.eu/en/european-digital-credentials-learning> [last accessed 11 February 2026].

European Commission, *Digital education action plan 2021-2027. Resetting education and training for the digital age*, "Education and Training", 2020. https://education.ec.europa.eu/sites/default/files/document-library-docs/deap-communication-sept2020_en.pdf [last accessed 11 February 2026].

European Parliament, *Digitalisation, artificial intelligence and algorithmic management in the workplace: Shaping the future of work*, "European Parliamentary Research Service", PE 774.670, 2025: [https://www.europarl.europa.eu/RegData/etudes/STUD/2025/774670/EPRS_STU\(2025\)774670_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2025/774670/EPRS_STU(2025)774670_EN.pdf) [last accessed 11 February 2026].

European Parliament, *The "Adonnino Report" - Report to the European Council by the ad hoc committee "On a People's Europe"*, A 10.04 COM 85, SN/2536/3/85, 1985. <https://www.ombudsman.europa.eu/en/historical/en/4659> [last accessed 11 February 2026].

European Parliament and Council of the European Union, *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)*, "Official Journal of the European Union", L 119/1, 2016. <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng> [last accessed 11 February 2026].

European Parliament and Council of the European Union, *Regulation (EU) 2019/881 of the European Parliament and of the Council of 17 April 2019 on ENISA (the European Union Agency for Cybersecurity) and on information and communications technology cybersecurity certification and repealing Regulation (EU) No 526/2013 (Cybersecurity Act)*, L 151/15, 2019. <https://eur-lex.europa.eu/eli/reg/2019/881/oj/eng> [last accessed 11 February 2026].

European Parliament and Council of the European Union, *Regulation (EU) 2024/903 of the European Parliament and of the Council of 13 March 2024 laying down measures for a high level of public sector interoperability across the Union (Interoperable Europe Act)*, L series, 2024. <https://eur-lex.europa.eu/eli/reg/2024/903/oj/eng> [last accessed 11 February 2026].

European Parliament and Council of the European Union, *REGULATION (EU) 2024/1689 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act)*, "Official Journal of the European Union", L series, 2024. Available on the EUR-Lex website of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1689> [last accessed 11 February 2026].

Floridi, L., *On Good and Evil, the Mistaken Idea That Technology Is Ever Neutral, and the Importance of the Double-Charge Thesis*. "Philos. Technol." Vol. 36, no. 60, 2023: <https://doi.org/10.1007/s13347-023-00661-4> [last accessed 11 February 2026].

Giacomini, G., Aprilis, C., *Digital Discrimination. The Challenge of Bias and Transparency in AI*, "Lessico di etica pubblica", no. 1, 2024. https://www.eticapubblica.it/wp-content/uploads/2025/02/04_-LEP1-24_Giacomini-e-Aprilis.pdf [last accessed 11 February 2026].

Guèye, L., Seow-Ganesan, D., Lantero, L., et al., *AI use in qualifications recognition: five key factors*, "University World News", 2025. <https://www.universityworldnews.com/post.php?story=20250109122353833> [last accessed 11 February 2026].

Huang, B., Niyomsilp, E., *The impact of artificial intelligence on organizational decision-making processes*, "Edelweiss Applied Science and Technology" Vol., 9, no. 4, 2025. <https://doi.org/10.55214/25768484.v9i4.6081> [last accessed 11 February 2026].

Kirchmer, M., *Realizing Appropriate Process Standardization – Basis for Effective Digital Transformation*, in Shishkov, B. (eds) *Business Modeling and Software Design*, Springer, Cham 2023, pp. 18-31. https://doi.org/10.1007/978-3-031-36757-1_2 [last accessed 11 February 2026].

Lantero, L., Ferranti, L., Finocchietti, C., et al., *Artificial Intelligence and Recognition of Qualifications: Opportunities and Risks from an ENIC-NARIC Perspective*, "DOC CIMEA", no. 141, 2023. https://www.cimea.it/Upload/Documenti/Artificial_Intelligence_and_Recognition_of_Qualifications.pdf [last accessed 11 February 2026].

Li, X., Turner, D., *National interests in an international organisation: an analysis of UNESCO's global convention on the recognition of qualifications concerning higher education*, "Compare: A Journal of Comparative and International Education", 2025, pp. 1-15. <https://doi.org/10.1080/03057925.2025.2602562> [last accessed 6 May 2026].

Madleňák, R., Madleňáková, L., Cvacho, V., et al., *Ethical Challenges of Artificial Intelligence in Higher Education: A Four-Pillar Student-Activity Framework for Institutional Governance*. "Educ. Sci" Vol. 555, no. 16, 2026. <https://doi.org/10.3390/educsci16040555> [last accessed 7 May 2026].

Mirmiran, F., *Data Privacy Concerns: How AI Is Changing the Landscape of Personal Information*, Zenodo, 2024. <https://doi.org/10.5281/zenodo.13822481> [last accessed 11 February 2026].

Observatory Magna Charta Universitatum, *Magna Charta Universitatum*, 1988. <https://www.magna-charta.org/magna-charta-universitatum/mcu-1988> [last accessed 11 February 2026].

OECD, *OECD Digital Education Outlook 2026. Exploring Effective Uses of Generative AI in Education*, "OECD Publishing", Paris 2026. <https://doi.org/10.1787/062a7394-en> [last accessed 11 February 2026].

NUFFIC, *Digitalisation of credential evaluation workflows: Practical guidelines for the ENIC-NARIC Networks*, 2023. Available on the NUFFIC website: <https://www.nuffic.nl/sites/default/files/2023-09/digitalisation-of-credential-evaluation-workflows.pdf> [last accessed 11 February 2026].

NUFFIC, *EAR Manual 2023*, 2023. Available on the NUFFIC website https://www.nuffic.nl/sites/default/files/2023-08/1.%20EAR%20Manual%202023_2nd%20edition.pdf [last accessed 11 February 2026].

Parasuraman, R., Sheridan, T. B., & Wickens, C. D., *A model for types and levels of human interaction with automation*, "IEEE Transactions on Systems, Man, and Cybernetics-Part A: Systems and Humans", no. 3, pp. 286-297, 2000. <https://ieeexplore.ieee.org/document/844354> [last accessed 6 May 2026].

Pedró, F., *The Recognition of Higher Education Qualifications – The Role of Quality Assurance Systems. How Quality Assurance Systems Can Promote, and Benefit from, The Recognition of Higher Education Qualifications*, in Karakhanyan, S., Kinser, K., *II Global Trends in Tertiary Education QA. Challenges and Opportunities in Internal and External QA*, "Global Perspectives on Higher Education", 2026, pp. 81-105. https://doi.org/10.1163/9789004752115_005 [last accessed 6 May 2026].

The Global Goals, *Quality Education*. Available on The Global Goals website: <https://www.globalgoals.org/goals/4-quality-education/> [last accessed 11 February 2026].

UNESCO, *Global Convention on the Recognition of Qualifications concerning Higher Education*, Paris, 2019. <https://unesdoc.unesco.org/ark:/48223/pf0000373602/PDF/373602eng.pdf.multi.page=3> [last accessed 11 February 2026].

UNESCO, *Guidance for generative AI in education and research*, Paris 2023. <https://unesdoc.unesco.org/ark:/48223/pf0000386693> [last accessed 11 February 2026].

UNESCO, *Six pillars for the digital transformation of education. A common framework*, Paris 2024. <https://unesdoc.unesco.org/ark:/48223/pf0000391299> [last accessed 11 February 2026].

UNESCO Institute for Statistics, *Total outbound internationally mobile tertiary students studying abroad, all countries, both sexes*, 2025. <https://data.uis.unesco.org/> [last accessed 11 February 2026].

Vendrell-Herrero, F., Para-González, L., Mascaraque-Ramírez, C., et al., *The order of the factors matters: How digital transformation and servitization integrate more efficiently*, "International Journal of Production Economics", 271, 2024. <https://www.sciencedirect.com/science/article/pii/S0925527324000859> [last accessed 11 February 2026].

Vital Bernardo, B.M., São Mamede, H., Pereira Barroso, J.M., et al., *Data governance & quality management—Innovation and breakthroughs across different fields*, "Journal of Innovation & Knowledge" 9, no. 4, 2024. <https://doi.org/10.1016/j.jik.2024.100598> [last accessed 11 February 2026].

Wang, Y., *Algorithmic decisions in education governance: implications and challenges*, "Discov Educ", no. 3, 2024. <https://doi.org/10.1007/s44217-024-00337-x> [last accessed 7 May 2026].

Advancing Automatic Recognition Through Digital Transformation: Balancing Automation with a Human-Centric Approach Ferranti L., Finocchietti C., Spitalieri S.

The Invisible Architecture of Academic Cooperation: Governance and Quality Between Internationalisation and Accountability

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| Abstract

This contribution analyses Transnational Education (TNE) as a structural dimension of the internationalisation of higher education (HE), with particular attention to governance and quality assurance profiles. After a conceptual and comparative framing of the phenomenon and of the main international and European instruments, the analysis focuses on the Italian case, highlighting its regulatory specificities, systemic critical issues, and recent developments. The comparison with selected national models, including Italy–United Kingdom cooperation, makes it possible to identify the limits and opportunities of TNE in the European context. The contribution concludes with some reflections on the future scenarios of TNE and on Italy's strategic positioning.

Keywords: Transnational Education (TNE), Internationalisation of Higher Education, Academic governance, Quality Assurance, Regulation of TNE, Transnational accreditation.

1. Introduction

Over the last two decades, Transnational Education (TNE) has established itself as one of the most significant modalities through which higher education (HE) systems respond to globalisation processes and the need to strengthen international cooperation in the academic sphere. The international debate continues to address the elements that define TNE, which is articulated and defined in various ways¹. For the purposes of this contribution, reference is made to the definition proposed by the Code of Good Practice in the Provision of Transnational Education, which considers TNE as a subset of cross-border education comprising study programmes, courses or educational services in which elements of a HE system are transferred or shared across borders, through a plurality of organisational and delivery modes, including digital and hybrid forms. This definition captures the intrinsically heterogeneous nature of TNE, moving beyond reductive interpretations based exclusively on the physical mobility of students or on the export of educational provision².

The growth of TNE is situated within a global context characterised by the expansion of the international student population, increasingly intense competition among university systems, and a progressive interconnection between HE, economic development, and cultural diplomacy³. In this framework, TNE has been interpreted both as a tool for widening access to HE and for capacity building in host countries, and as a strategic lever for the international projection of institutions and individual national systems⁴.

At the same time, the expansion of TNE activities has brought to light several structural critical issues:

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¹ For some authors, it encompasses all forms of higher education provision in which students are in a country different from that of the institution awarding the qualification, including models such as branch campuses, franchising, joint programmes and double or multiple qualifications, as well as other structured forms of collaboration between institutions from different countries. Alam, F., Alam, Q., Chowdhury, H., et al., *Transnational education: benefits, threats and challenges*, "Procedia Engineering", Vol. 56, Elsevier, 2013, pp. 870-874; Knight, J., *Transnational education remodeled: toward a common TNE framework and definitions*, "Journal of Studies in International Education", Vol. 20, no. 1, 2015, pp. 34-47. Bannier, B. J., *Global trends in Transnational Education*, "International Journal of Information and Education Technology", Vol. 6, no. 1, January 2016, p. 81. Francois, E. J., Avoseh, M. B.M., Griswold, W., *Perspectives in Transnational Higher Education*, Sense Publishers, Rotterdam (Holland), 2016. Healey, N. M., *Transnational education and domestic higher education in Asian-Pacific host countries*, "Pacific-Asian education: A journal about education in the Pacific circle countries", Vol. 29, 2017. Knight, J., McNamara, J., *Transnational education: a classification framework and data collection guidelines for international program and provider mobility (IPPM)*, British Council, 2017; Mediterranean Automatic Recognition Network Project (MAREn), *Transnational education in the Adriatic and Mediterranean regions*, CIMEA, 2024. <https://automaticrecognitionnetworks.info/wp-content/uploads/2024/03/Pubblicazione-Maren-TNE.pdf> [last accessed 9 Jun 2026]. Cirlan, E., Tsigikiris, V., Skjerven, S. A., et al., *In addressing TNE governance challenges, students are key*, University World News, 2025. <https://www.universityworldnews.com/post.php?story=20250617155942227>. [last accessed 9 Jun 2026]. other authors identify it as «... form of education that borrows or transfers elements of one country's higher education system, as well as that country's culture and values, to another country...»: Cf. Wilkins, S., Huisman, J., *Transnational Education Redefined*, "International Higher Education", Vol. 121, 2024, pp.16-17.

² In the current version adopted in Paris on 22 October 2025, according to which TNE is: «A subset of cross-border education where study programmes, or sets of courses, or educational services borrow or transfer elements of one country's higher education system (or non-country specific education systems) from or to another country. It may involve the movement of faculty, learners, knowledge, programmes, providers and curricula across jurisdictional borders. It may encompass a wide range of mode of delivery (including distance and blended learning) and may or may not require learners mobility. The programme(s) and qualification(s) awarded may belong to the domestic education system of reference of the providing institution, to the education system of a State different from the State in which the providing institution operates, or may be independent of any national education system». See UNESCO/Council of Europe, *Code of Good Practice in the provision of Transnational Education*, <https://rm.coe.int/code-of-good-practice-in-tne-adopted-on-22-october-2025/4880291d8e> [last accessed 30 January 2026].

³ Alam, F., Alam Q., Chowdhury, H., et al., *Transnational education...* cit. Francois, E. J., Avoseh, M. B.M., Griswold, W., *Perspectives in Transnational Higher Education*, cit. Bosire, J., Amimo, C., *Emerging issues and future prospects in the management of Transnational education*, "International Journal of Higher Education", Vol. 6, no. 5, 2017, pp. 143-154. Healey, N., M., *The end of transnational education? The view from the UK*, "Perspectives: Policy and practice in Higher Education", Vol. 24, no. 3, 2020, pp. 102-112. Cirlan, E., Tsigikiris, V., Skjerven, S. A., et al., *In addressing TNE...*, cit.

⁴ Knight, J., McNamara, J., *Transnational education...*, cit., p. 50. Bosire, J., Amimo, C., *Emerging issues and future prospects...*, cit.

questions have arisen regarding the quality of educational provision⁵, student protection, deficiencies in support services or difficulties in the recognition of awarded qualifications⁶ and the distribution of responsibilities between sending and host countries⁷. These critical issues have encouraged the development of reference instruments at international and regional level⁸, aimed at ensuring greater coherence and reliability of transnational HE systems.

In this scenario, TNE emerges as a structural dimension of the internationalisation of HE, with significant implications in terms of governance, quality, and qualification recognition⁹. This evolution is particularly evident in the European framework, where initiatives such as the European Universities Alliances, the European Degree Label and European Degree project outline advanced forms of transnational cooperation based on joint programmes (JPs)¹⁰, integrated mobility and shared Quality Assurance systems¹¹.

Italy occupies a distinctive position within this framework. While national strategies¹², and the National Recovery Plan (PNRR) investments signal growing political recognition of TNE¹³, the regulatory framework appears fragmented and outdated¹⁴. This makes a systematic analysis particularly relevant,

⁵ Particularly with reference to curriculum coherence, the qualifications of teaching staff and the effective equivalence of academic standards compared to programmes delivered in the country of origin.

⁶ Especially within more complex cooperation models, where the boundary between academic and administrative responsibilities may be unclear.

⁷ Both in terms of Quality Assurance and regulatory supervision, thus requiring precise and effective coordination among different national systems and competent authorities.

⁸ At international level, reference may be made, for example, to: Organisation for Economic Co-operation and Development (OECD), *Guidelines for Quality Provision in Cross-Border Higher Education*, <https://unesdoc.unesco.org/ark:/48223/pf0000143349> [last accessed 30 January 2026]. International Network for Quality Assurance Agencies in Higher Education (INQAAHE), *International Standards and Guidelines for Quality Assurance in Tertiary Education (ISG)*, <https://www.inqaahe.org/wp-content/uploads/2024/05/INQAAHE-International-Standards-and-Guidelines-ISG.pdf> [last accessed 30 January 2026]. By contrast, at European level, instruments of this kind are situated within the broader framework of the Bologna Process and the European Higher Education Area (EHEA), founded on principles of mutual trust, qualification recognition and structured cooperation. Particular reference may be made to the Key considerations for Cross-Border Quality Assurance in the European Higher Education Area, <https://www.eqar.eu/assets/uploads/2018/04/key-considerations-for-cross-border-quality-assurance-in-the-ehea.pdf> [last accessed 30 January 2026], to the mentioned Code of Good Practice and, to a lesser extent given their more explicitly regional scope, to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), https://ehea.info/media.ehea.info/file/ESG/00/2/ESG_2015_616002.pdf [last accessed 30 January 2026] and to the The European Quality Assurance Register for Higher Education (EQAR), *European Approach for Quality Assurance of Joint Programmes (EA)*, <https://www.eqar.eu/kb/joint-programmes/> [last accessed 30 January 2026].

⁹ Knight, J., McNamara, J., *Transnational education...*, cit. Cirlan, E., Tsiligiris, V., Skjerven, S. A., et al., *In addressing TNE...*, cit.

¹⁰ For further information on the European Universities Alliances, the European Commission database may be consulted: *European Universities alliances and their partners* <https://education.ec.europa.eu/education-levels/higher-education/european-universities-initiative/map> [last accessed 30 January 2026]; also see: Ieva Grumbinaite, Flávia Colus, Hugo Buitrago Carvajal, *Report on the outcomes and transformational potential of the European Universities initiative*, Publications Office of the European Union, Lussemburgo, 2025.

¹¹ See the Recommendation of the Council of the European Union, C/2025/3006, on a European system for Quality Assurance and recognition in higher education; moreover, with regard to the path undertaken by the European Commission concerning European degrees, reference should be made to the Blueprint for a European Degree and to the ongoing work for the establishment and introduction of a joint European label <https://education.ec.europa.eu/education-levels/higher-education/joint-european-degree/working-towards-a-joint-european-degree> [last accessed 30 January 2026].

¹² As evidenced by the Strategy for the Internationalisation of the Italian University System 2024–2026 <https://www.mur.gov.it/sites/default/files/2024-09/Strategia%20Internazionalizzazione%20MUR%202024-2026.pdf> [last accessed 30 January 2026] and by Ministerial Decree No. 773 of 10 June 2024, which closely links the achievement of university objectives to the resources allocated under the National Recovery Plan (PNRR).

¹³ TNE is explicitly recognised as a strategic area within Mission 4, Component 2, Investment 3.4, which allocates specific resources to the development of transnational educational initiatives promoted by Italian universities. In this regard, reference should be made to Directorate Decree No. 167 of 3 October 2023 of the Ministry of University and Research (MUR) which, by defining objectives, areas of intervention and selection criteria, allocated approximately €50 million to the funding of TNE projects, with the aim of supporting the creation and strengthening of international academic partnerships, the activation of joint educational programmes, including in digital or hybrid modes, and the development of TNE initiatives in geographical areas considered priorities for Italian international cooperation.

¹⁴ Especially when compared with other European countries. Lantero, L., Finocchietti, C., Gitto, E., et al., *Foreign schools in Italy and Italian schools abroad legislation, characteristics and recognition of qualifications*, CIMEA, 2021. https://www.cimea.it/Upload/Documenti/5278_Foreign%20schools%20in%20Italy_DEF_22.07.21.pdf, [last accessed 9 Jun 2026]. Trifirò, F., *Academic co-operation between the United Kingdom and Italy: Research a study on opportunities and challenges*, British Council, 2025, pp. 21–24. <https://www.britishcouncil.it/sites/default/files/uk-it-final-report-04292025-final-web.pdf> [last accessed 9 Jun 2026].

one that relates the Italian case to international models and to the available quality and recognition instruments.

1.1 Methodology

The article adopts a qualitative documentary and comparative methodology based on academic literature, international policy documents and Quality Assurance (QA) instruments. Particular attention is devoted to the distinction between sending and receiving systems and to the positioning of the Italian case within the European Higher Education Area (EHEA).

2. Transnational Education and International Cooperation: Definitions, Models and Open Issues

TNE differs from other internationalisation practices because it transforms international cooperation into stable educational provision delivered beyond national borders¹⁵. However, the field remains affected by terminological fragmentation, which hinders comparability and coherent governance: to cite a single example, it is well known that study programmes described as “international” or “joint” may in fact differ significantly regarding the nature of the qualification awarded, the legal value of the diploma and the possibilities for professional recognition¹⁶. The earliest forms of TNE were historically interpreted and classified within the conceptual framework offered by the General Agreement on Trade in Services (GATS), an international agreement adopted in 1995 within the framework of the World Trade Organization (WTO) to regulate trade in services at global level¹⁷. Based on this scheme, early TNE practices were associated with models such as franchising, branch campuses and institutional joint ventures (commercial presence), as well as the temporary mobility of teaching staff¹⁸.

Precisely in response to the limitations of this approach, more recent literature has progressively proposed alternative interpretative frameworks, more clearly oriented towards academic cooperation and the sharing of responsibilities. A more effective approach distinguishes between (i) collaborative models and (ii) non-collaborative models¹⁹.

¹⁵ Knight, J., McNamara, J., *Transnational education...*, cit., p. 50. Knight, J., *Transnational education remodeled*, cit. Centro di Informazione sulla Mobilità e le Equivalenze Accademiche (CIMEA), *Automatic Recognition in the Adriatic Region Project (AdREN)*, *Transnational Education in 4 countries of the Adriatic region: Regulation, quality assurance and information provision*, CIMEA, 2022. Cirlan, E., Tsiligiris, V., Skjerven, S. A., et al., *In addressing TNE...*, cit.

¹⁶ Consider also the inconsistent and often interchangeable use of terms such as “cross-border education”, “offshore education” or “borderless education”. See: Knight, J., McNamara, J., *Transnational education...*, cit., Healey, N., M., *Transnational education*, cit.

¹⁷ In this initial phase, cross-border educational activities were predominantly interpreted through a logic of trade in services, rather than as forms of structured academic cooperation.

¹⁸ Knight, J., *Higher Education Crossing Borders: A Guide to the Implications of the General Agreement on Trade in Services (GATS) for Cross-border Education*, COL/UNESCO, Francia, 2006, pp. 30 ff. Philip, G. Altbach, Knight, J., *The Internationalization of Higher Education: motivations and realities*, “Journal of Studies in International Education”, Vol. 11, 2007, pp. 290-305. Francois, E. J., Avoseh, M. B.M., Griswold, W., *Perspectives in Transnational Higher Education*, cit., pp. 8 ss. Bosire, Amimo, *Emerging issues and future prospects...*, cit.

¹⁹ The former include joint Study programmes (leading to joint as well as double or multiple qualifications), based on institutional partnerships, shared responsibilities, and joint governance mechanisms. The latter include more unilateral forms of provision, such as branch campuses or franchising, in which the home institution retains primary control over curriculum, quality and the awarding of the qualification. This distinction is central to analysing the actual degree of international cooperation underlying different TNE initiatives. Alongside these more institutionalised forms, it is also possible to observe the emergence of specific territorial configurations, in which TNE intersects with strategies for economic and urban development, while at the same time raising questions about the role of public and private actors in the regulation of higher education. Also consider the transnational education zones and the education cities: See Kleibert J. M., Bobée, A., Rottlieb, T., et al., *Transnational education zones: Towards an urban political economy of ‘education cities’*, “Urban Studies”, Vol. 58, no. 14, 2021, pp. 2845-2862.

In the European context, the relationship between TNE and international cooperation has undergone significant evolution, as demonstrated by the experience of the European Universities Alliances. Within these initiatives, TNE is increasingly configured not as the export of educational provision, but as the construction of integrated transnational educational spaces, characterised by flexible curricula, blended mobility, and shared governance. However, regulatory and administrative obstacles persist, particularly – though not exclusively – in the fields of accreditation and qualification recognition, reflecting a structural tension between transnational ambitions and national frameworks²⁰. Among the many open issues, the governance of transnational partnerships and student protection emerge as particularly critical dimensions, especially in collaborative models, where the distribution of responsibilities among institutions, national authorities and QA agencies may be ambiguous²¹. An equally delicate issue concerns the recognition of qualifications awarded in TNE contexts, which may prove complex due to the plurality of legal systems involved and the difficulty of identifying the competent reference system, particularly in multilateral collaborative models. With specific regard to the Italian case, these issues take on distinctive characteristics. The cautious approach historically adopted by the national regulatory framework has limited the diffusion of incoming TNE models²², while at the same time ensuring strong integration with the national system of quality and qualification recognition²³. In parallel, more recent policies indicate a growing interest in outgoing TNE as a tool for international cooperation and science diplomacy. Overall, the distinction between incoming and outgoing TNE highlights the difficulty of reconciling the increasing complexity of transnational practices with adequate governance arrangements and quality mechanisms, thus laying the groundwork for the analysis of Quality Assurance instruments addressed in the following sections²⁴.

2.1 TNE and Cross-Border Quality Assurance: Convergences, Differences and Conceptual Issues

In the international debate, the notions of TNE and Cross-Border Quality Assurance (CBQA) are frequently referred to jointly and, at times, used in an almost overlapping manner. For the purposes of this contribution, it is essential to underline from the outset that the two terms are not fully coincident, although they are closely interdependent. TNE primarily designates a set of practices and models of transnational educational provision, whereas CBQA refers to the mechanisms through which the quality of such practices is evaluated, assured, or recognised across national borders. From this perspective,

²⁰ These critical issues are also explicitly acknowledged at European institutional level: the aforementioned Blueprint for a European Degree (see supra note 11), developed on the basis of evidence emerging from pilot projects and experimental activities carried out within the European Universities Alliances, identifies differences among national legislations, accreditation procedures and qualification recognition mechanisms as some of the main obstacles to the development of advanced forms of transnational cooperation, highlighting the need for progressive and coordinated solutions at European level.

²¹ Hopbach, A., UNESCO-OECD *Guidelines for Quality Provision in Cross-border Higher Education. Analysis and recommendations to move forward*, 2022. <https://unesdoc.unesco.org/ark:/48223/pf0000389910>, [last accessed 9 Jun 2026]. Carvalho, N., Rosa, M. J., Amaral, A., *Cross-Border Higher Education and Quality Assurance. Results from a Systematic Literature Review*, "Journal of Studies in International Education", Vol. 27, no. 5, pp. 695-718; Cirlan, E., Tsiligiris, V., Skjerven, S. A., et al., *In addressing TNE...*, cit.

²² See below §4.

²³ See Trifirò, *Academic co-operation between the United Kingdom and Italy...*, cit. For a specific focus on the Italian case, see below §4.

²⁴ See below §3.

CBQA performs an essential function in supporting the legitimacy and sustainability of TNE, without exhausting its strategic and institutional scope²⁵.

The growing diffusion of TNE has progressively rendered insufficient an approach to quality based exclusively on national frameworks. In this context, CBQA emerges as a functional response to the need to build mutual trust among HE systems, public authorities, and stakeholders, especially where programme delivery, student enrolment and the awarding of qualifications involve multiple legal systems. However, an excessive conceptual overlap between TNE and CBQA risks reducing TNE to a predominantly technical or procedural issue. Indeed, TNE also entails strategic and institutional choices affecting governance and sustainability²⁶.

In the Italian context²⁷, CBQA still tends to take the form of a fragmented response to specific needs, rather than constituting an integral part of a systemic TNE strategy. The EHEA offers the possibility of overcoming such fragmentation by promoting convergence and mutual trust through shared instruments²⁸. The most recent developments (particularly the European Universities Alliances initiative) demonstrate how TNE and CBQA may progressively converge within long-term structural cooperation models, in which quality is not merely verified across borders, but co-produced through shared governance and integrated processes²⁹.

3. TNE and Quality: International Instruments and Models Compared

The expansion of TNE has made quality one of the central issues in academic debate and international cooperation policies. The cross-border nature of TNE challenges the territorial assumptions on which national Quality Assurance (QA) systems are based, raising questions regarding the distribution of responsibilities among institutions, agencies, and competent authorities in the countries of origin and host countries³⁰.

At global level, the most widely shared reference is probably represented by the UNESCO-OECD Guidelines³¹, which introduce the principle of shared responsibility and place student protection and

²⁵ See European Association for Quality Assurance in Higher Education (ENQA), European Students' Union (ESU), European University Association (EUA) et al., *Key Considerations for Cross-Border Quality Assurance in the European Higher Education Area*, Bruxelles (Belgium), 2017 <https://www.eqar.eu/kb/cross-border-qa/key-considerations/> [last accessed 3 February 2026]. INQAAHE, *International Standards and Guidelines*, cit., p. 42. UNESCO, Council of Europe, *Code of Good Practice in the Provision of Transnational Education*, 2025 <https://rm.coe.int/code-of-good-practice-in-tne-adopted-on-22-october-2025/4880291d8e> [last accessed 3 February 2026]. See also Knight, J., *Transnational education remodeled*, cit.; Hopbach, A., *UNESCO-OECD Guidelines*, cit., pp. 16 ff. Carvalho, N., Rosa, M. J., Amaral, A., *Cross-Border Higher Education and Quality Assurance...*, cit.

²⁶ Knight, J., *Transnational education remodeled*, cit.; Kleibert, Bobée, Rottlieb et al., *Transnational education zones...*, cit.; Cirlan, E., Tsiligiris, V., Skjerven, S. A., et al., *In addressing TNE...*, cit.

²⁷ This will be discussed in greater detail below, § 4.

²⁸ Reference may be made to the repeatedly mentioned ESG, qualification frameworks, the European Approach, or mutual recognition mechanisms.

²⁹ Reference may also be made to the European Degree and European Degree Label. It should further be noted that the activities of the specific Working Groups of the Thematic Peer Group C on Quality Assurance (TPG C on QA) of the Bologna Follow-Up Group (BFUG), which, among numerous topics, also address Cross-Border Quality Assurance (CBQA). The European Higher Education Area, *Bologna Follow-Up Group (BFUG), Cross-Border Quality Assurance (CBQA)* <https://ehea.info/page-peer-group-C-QA> [last accessed 3 February 2026].

³⁰ Trifirò, F., *The importance of cross-border cooperation in the quality assurance of TNE: a comparative overview of national approaches to TNE*, "Higher Education Evaluation and Development", Vol. 13, no. 2, 2019, pp. 54-64.

³¹ OECD, *Guidelines for Quality Provision...*, cit.

transparency of educational provision at the centre. They take the form of a soft law instrument aimed at promoting general principles without introducing binding mechanisms or common evaluation procedures. This approach reflects the strong heterogeneity of HE systems worldwide and privileges flexibility over harmonisation.

In the European context, by contrast, the ESG constitute the shared framework for QA. Although not specifically designed for TNE, they provide principles that are also applicable to transnational provision, particularly regarding programme design, student involvement and transparency of information³². Another significant contribution is represented by the European Approach (EA)³³, a further step towards integration, which introduces a single evaluation procedure for JPs based on the mutual recognition of accreditation decisions, while reducing duplication of evaluations and strengthening mutual trust³⁴. Alongside these instruments, project-based initiatives such as Quality Assurance of Cross-Border Higher Education (QACHE) and its direct continuation Robust Quality Assurance of Transnational Education (ROQA-TNE)³⁵, as well as attempts at regional alignment of the underlying principles of QA such as those between ENQA and SIACES (ESG-PBP) or ASEAN (ESG-AQAF)³⁶, highlight the importance of cooperation among agencies in the absence of a binding international framework.

Overall, the comparison between the European and global levels reveals a structural tension between two models of quality governance: on the one hand, a principle-based model, oriented towards flexibility and voluntary cooperation; on the other hand, a process-oriented model, aimed at building mutual trust through shared procedures and automatic recognition. In the case of TNE, this tension translates into the difficulty of ensuring comparability, respect for national diversity and administrative sustainability of quality processes at the same time³⁷.

3.1 Comparative Examples of National Quality Models in TNE

The comparative analysis of selected national Quality Assurance (QA) models applied to TNE highlights a plurality of approaches: in the United Kingdom the QA Agency for Higher Education (QAA) assigns full academic responsibility for TNE programmes to UK universities, regardless of the place of delivery, placing emphasis on the equivalence of standards and on the management of reputational risks³⁸;

³² ESG https://ehea.info/media.ehea.info/file/ESG/00/2/ESG_2015_616002.pdf [last accessed 3 February 2026].

³³ EA <https://www.eqar.eu/kb/joint-programmes/> [last accessed 3 February 2026].

³⁴ A cornerstone in both European and international integration processes. See Onița, H., Gvritshvili, A., Maruszczak, J., *Quality Assurance Fit for the Future - Students' perspective*, s.p., s.p., 2023. <https://esu-online.org/publications/quality-assurance-fit-for-the-future-studentsperspective/> [last accessed 3 February 2026].

³⁵ QACHE: <https://www.enqa.eu/publications/a-toolkit-for-quality-assurance-agencies/> [last accessed 3 February 2026]. ROQA-TNE: <https://www.enqa.eu/projects/robust-quality-assurance-of-transnational-education/> [last accessed 3 February 2026].

³⁶ ENQA/SIACES: <https://www.enqa.eu/projects/alignment-of-siaces-enqa-quality-guidelines-in-higher-education-for-strengthening-bi-regional-trust-esg-pbp-alignment/> [last accessed 3 February 2026]. The European Association for Quality Assurance In Higher Education, *ENQA/ASEAN*, https://euinasean.eu/wp-content/uploads/2024/11/Comparability-Study-of-AQAF-_-ESG-Web.pdf [last accessed 3 February 2026].

³⁷ Bordogna, C. M., *Are Degree-awarding Institutions doing enough to Support the Implementation of Quality Assurance in Transnational Higher Education Partnerships?*, "Journal of Studies in International Education", Vol. 24, no. 3, 2019, pp. 371-386; Trifirò, F., *The importance of cross-border cooperation...*, cit.

³⁸ See Quality Assurance Agency for Higher Education, *Quality Evaluation and Enhancement of UK Transnational Higher Education*, 2024, <https://www.qaa.ac.uk/international/transnational-education/quality-evaluation-and-enhancement-of-uk-tne> [last accessed 9 Jun 2026]. see also: Bordogna, C. M., *Are Degree-awarding Institutions doing enough...*, cit. Lamers-Reeuwijk, A. M., Admiraal W. F., van der Rijst R. M., *Expatriate academics and transnational teaching: the need for quality assurance and quality enhancement to go hand in hand*, "Higher Education Research & Development", Vol. 398, no. 4, 2020, pp. 733-747; Trifirò, F., *The importance of cross-border cooperation...*, cit.

Australia adopts a similar approach but with stronger regulatory intervention³⁹; Hong Kong and Malaysia adopt models typical of “receiving” countries, in which greater attention is devoted to regulating foreign provision delivered within the national territory⁴⁰.

Comparative evidence suggests that there is no single quality model applicable to TNE. In the absence of a binding international framework, the literature broadly agrees that strengthening cross-border cooperation among QA agencies represents the most effective strategy for ensuring high-quality, sustainable, and credible TNE in the long term⁴¹.

4. The Italian Case: Current Framework, Potential and Critical Issues

Although in Italy TNE is part of the strategy for the internationalisation of the HE system, the current regulatory framework appears outdated and incomplete. This limited observability represents, in the current context, a structural critical issue of the Italian system⁴². Important asymmetries persist in the availability and accessibility of information concerning different forms of TNE. While some institutional information is publicly available regarding incoming TNE initiatives operating within the Italian territory, including authorised foreign institutions and branch campuses, no equivalent and systematic framework currently exists for mapping and monitoring Italian TNE activities developed abroad. Consequently, outgoing TNE initiatives promoted by Italian HEIs often remain only partially observable, especially in relation to the typology of partnerships, geographical distribution, governance arrangements and Quality Assurance mechanisms adopted.

This informational fragmentation limits not only the comparability and transparency of the system, but also the possibility of developing evidence-based policies and coherent strategies for internationalisation. Moreover, it may affect the visibility and international positioning of Italian institutions engaged in transnational cooperation, while complicating the assessment of the long-term impact and sustainability of TNE initiatives. From a regulatory perspective, the Italian system distinguishes between incoming TNE and outgoing TNE⁴³: the former is regulated in a detailed manner, albeit based on dated legislation,

³⁹ In this case, TNE is regarded as a strategic sector of educational export, and quality is ensured through a centralised system of registration and supervision aimed at protecting students and safeguarding the reputation of the national system, particularly in offshore contexts. Here, TNE is subject to stringent oversight, reflecting the sector's high economic relevance. See Bordogna, C. M., *Are Degree-awarding Institutions doing enough...*, cit., pp. 5 ff. Trifirò, F., *The importance of cross-border cooperation...*, cit., pp. 56-57; Hopbach, A., *UNESCO-OECD Guidelines*, cit., pp. 10 ff. Carvalho, N., Rosa, M. J., Amaral, A., *Cross-Border Higher Education and Quality Assurance...*, cit., pp. 702 ff.

⁴⁰ For an overview of receiving countries, See Gover, A., Blackstock, D., *Protecting the interests of students on transnational education programmes: the role of transparent quality assurance*, 2023. <https://www.enqa.eu/publications/protecting-the-interests-of-students-on-transnational-education-programmes-the-role-of-transparent-quality-assurance/> [last accessed 9 June 2026]. More specifically with regard to the contexts of the Asian region: Mok, K. H., Khai T. S., *Transnationalization of higher education in China and Asia: quality assurance and students' learning experiences*, “Asian Education and Development Studies”, Vol. 13, no. 3, 2024, pp. 208-226. Of particular interest are also the specific reports of the Quality Assurance Agency for Higher Education (QAA). QAA, *Country report: Hong Kong (Special Administrative Region of the People's Republic of China)*, Gloucester (UK), 2018. QAA, *UK Transnational Education in Malaysia*, Gloucester (UK), 2020 <https://www.qaa.ac.uk/international/transnational-education/country-reports> [last accessed 4 February 2026].

⁴¹ Trifirò, F., *The importance of cross-border cooperation...*, cit. Hopbach, A., *UNESCO-OECD Guidelines*, cit., p. 26.

⁴² Lantero, Finocchietti, Gitto et al., *Foreign schools in Italy...*, cit.

⁴³ As will be discussed in greater detail shortly, in the first case these are mainly initiatives promoted by foreign universities within the national territory, whereas in the second case international programmes and partnerships developed by Italian universities abroad prevail.

while the latter is substantially lacking an organic framework⁴⁴.

Incoming TNE mainly takes the form of (i) “filiation” of foreign universities or (ii) accredited branch campuses of foreign universities. In the first case, foreign universities (legally recognised in their home country as non-profit HEIs) are authorised to decentralise part of their teaching or research programmes in Italy, for the exclusive purpose of allowing only students enrolled at those universities to obtain, through a period of study in Italy, additional competences compared to those they would acquire by studying exclusively in their home country⁴⁵. In this case, enrolled students are not included in the national student registry, and the final qualification awarded remains a foreign one, which must be formally recognised in Italy for any local use (e.g. for public competitions or further study). Initiatives of this type are subject to ministerial authorisation and can’t concern Study programmes with nationally regulated limited access, such as Medicine. The second case concerns foreign HEIs operating in Italy whose qualifications may be admitted to recognition under the framework established by Ministerial Decree MIUR No. 214 of 26 April 2004. In this context, foreign institutions may operate through organisational structures established in Italy, including branch campuses, while the Decree specifically regulates the criteria and procedures relevant to the recognition of the qualifications awarded. Students enrolled in these institutions may therefore obtain foreign qualifications capable of being recognised in Italy under the same conditions applicable to qualifications issued by the corresponding institution in the country of origin⁴⁶. Currently, the only operational example of a branch campus in Italy is ESCP Business School, based in Turin⁴⁷. It is also appropriate to mention a further and distinctive form of TNE within the Italian system, represented by the European University Institute (EUI) in Fiesole⁴⁸, established through an international convention in 1972. Although not fully comparable to ordinary TNE models, the EUI constitutes a significant example of advanced transnational integration in the field of postgraduate education and research, devoted to training in the social sciences, law and economics, mainly related to European issues.

Outgoing TNE currently encompasses a heterogeneous set of initiatives, including joint degree programmes and double qualifications, pathways delivered partially abroad and long-term academic cooperation projects. In this field, a significant impulse has derived from the investments under the PNRR – Mission 4, which explicitly recognise TNE as an instrument of science diplomacy, cultural promotion, and the strengthening of international partnerships⁴⁹.

Considering the foregoing, it can be affirmed that the Italian case is undergoing a phase of profound transition, in which the political and strategic recognition of TNE is not yet fully accompanied by regulatory and quality instruments adequate to the growing complexity of transnational practices. This tension constitutes one of the main critical issues of the system and represents a key element for reflection

⁴⁴ The main Italian regulatory references concerning incoming TNE, and the recognition of foreign higher education qualifications currently consist of Article 2 of Law No. 4 of 14 January 1999 (governing the so-called “branches of foreign universities in Italy”), the subsequent Ministerial Directive of 23 May 2000 and Ministerial Decree MIUR No. 214 of 26 April 2004 (adopted pursuant to Article 4 of Law No. 148 of 11 July 2002, ratifying the Lisbon Recognition Convention).

⁴⁵ Strictly linked to the specific features of the Italian territory, its culture and history.

⁴⁶ On the current regulatory framework, see *supra* note 43. See also: Lantero, Finocchietti, Gitto et al., *Foreign schools in Italy...*, cit.

⁴⁷ See: Ministero dell’Università e della Ricerca, *Università straniere e filiazioni*, <https://www.mur.gov.it/it/aree-tematiche/universita/universita-straniere-e-filiazioni> [last accessed 5 February 2026]. <https://escp.eu/turin> [last accessed 5 February 2026].

⁴⁸ European University Institute, <https://www.eui.eu/en/home> [last accessed 5 February 2026].

⁴⁹ On this point, see also the Strategy for the Internationalisation of the Italian University System 2024–2026, cited above.

on the future developments of Italian and European TNE, also considering a particularly relevant issue related to the QA of TNE. In the Italian system, QA mechanisms in HE are traditionally centred on the processes of initial and periodic accreditation of Study programmes and institutional sites, as well as on external evaluations conducted by ANVUR, in line with the ESG. However, these instruments only partially address the specific features of TNE, particularly in the case of complex JPs or outgoing transnational initiatives. The adoption of the EA by ANVUR represents a significant advancement, as it allows the evaluation of JPs through a single procedure based on mutual recognition. Nevertheless, the EA covers only a limited type of provision and does not constitute an organic framework for the Quality Assurance of TNE.

In the absence of dedicated instruments tailored to the different forms of TNE, the evaluation of transnational initiatives tends to be addressed, on a case-by-case basis, through existing national mechanisms or through informal cooperation arrangements among institutions and agencies, with the risk of persistent fragmentation of approaches and limited comparability of outcomes.

4.1 Cooperation with the United Kingdom in Transnational Education

Despite the limitations highlighted, Italy remains a highly active actor in international policies, proven by its extensive cooperation with the UK (notwithstanding the transformations following the UK's withdrawal from the European Union). The UK system has long been one of the leading global actors in TNE, characterised by a wide diffusion of offshore programmes, institutional partnerships, franchising arrangements and flexible collaboration models, supported by strong organisational capacity and a quality framework oriented towards the responsibility of the home institution⁵⁰. However, the British model also presents several structural complexities that have increasingly emerged in the debate on TNE governance and Quality Assurance. In the UK framework, degree-awarding institutions remain fully responsible for the academic standards and quality of programmes delivered abroad, regardless of the delivery arrangements adopted. This implies that transnational provision is expected to maintain standards equivalent to those of programmes offered within the home system, while simultaneously adapting to different local regulatory and institutional contexts. In practice, ensuring such equivalence may prove particularly challenging in large-scale partnerships or in highly diversified transnational arrangements. Particular attention has been devoted to validation arrangements, through which a UK institution authorises a partner organisation to deliver programmes leading to a qualification formally awarded by the validating institution. Although these models may facilitate international cooperation and widen educational opportunities, they also raise issues related to institutional oversight, reputational risks, transparency of responsibilities and the effective protection of students, especially where academic and administrative functions are distributed across multiple actors⁵¹. These tensions reflect broader challenges associated with the balance between institutional flexibility and the preservation of coherent academic standards in TNE contexts⁵².

⁵⁰ Healey, N., M., *The end of transnational education...*, cit. Manacorda, E., Gabaglio, L., Iannaccone, S., UK-IT Best + Shape Project: final report, Galileo servizi editoriali srl, 2023, https://www.galileonet.it/wp-content/uploads/2023/02/UK_libro_stampa_web.pdf, [last accessed 9 Jun 2026]. Trifirò, F., *Academic co-operation...*, cit.

⁵¹ QAA, *Quality Evaluation and Enhancement...*, cit.

⁵² Trifirò, F., *Academic co-operation...*, cit. Gover, A., Blackstock, D., *Protecting the interests...*, cit.

Additional complexities emerge in relation to certain validation arrangements involving foreign providers operating in Italy. In these cases, concerns have been raised regarding the variability of Quality Assurance mechanisms and the degree of effective academic oversight exercised by the degree-awarding institution. The Italian framework governing the recognition of foreign qualifications, particularly under Ministerial Decree No. 214/2004 and the broader principles of the Lisbon Recognition Convention, requires that recognised qualifications be awarded within systems and institutions possessing clear academic legitimacy and sufficiently transparent quality arrangements. In practice, this may create uncertainties in relation to some forms of transnational provision based on highly decentralised validation models. From this perspective, the Italian debate has increasingly distinguished between structured forms of inter-university cooperation involving officially recognised HEIs and more market-oriented forms of transnational provision centred on foreign providers operating through validation agreements.

However, UK–Italy cooperation in the field of TNE highlights critical issues attributable to differences in governance models, QA systems and institutional expectations. As suggested by comparative studies on the topic, such differences may result in additional administrative burdens, decision-making asymmetries, and difficulties in aligning national standards, particularly in post-Brexit contexts. Nevertheless, the bilateral relationship continues to be regarded as strategic, also considering the opportunities offered by new extra-EU cooperation instruments and by initiatives aimed at maintaining and strengthening academic ties between the two countries⁵³.

4.2 Systemic Obstacles and Opportunities to Be Seized in TNE

The analysis conducted thus far on TNE practices and policies highlights a series of systemic obstacles that affect the capacity of institutions to develop effective and sustainable transnational cooperation. Among these, particular attention should be paid to cultural and organisational barriers, power asymmetries among partners, differences in pedagogical models and persistent digital divides, which may compromise the quality of the educational experience and the reciprocity of partnerships⁵⁴. A central issue concerns the misalignment between principles and practices in the fields of QA and recognition. Differences in accreditation requirements, evaluation systems and qualification recognition procedures continue to represent a constraint on the development of TNE⁵⁵.

⁵³ Manacorda, E., Gabaglio, L., Iannaccone, S., *UK-IT Best ...*, cit., pp. 3 ff. Trifirò, F., *Academic co-operation...*, cit., p. 37.

⁵⁴ Francois, E. J., Avoseh, M. B.M., Griswold, W., *Perspectives in Transnational Higher Education*, cit. Caniglia, G., Luederitz, C., Groß, M., et al., *Transnational collaboration for sustainability in higher education: Lessons from a systematic review*, "Journal of Cleaner Production", Vol. 168, 2017, pp. 764-779.

⁵⁵ The experiences of receiving countries such as Ireland and Malaysia show that, in the absence of effective cooperation among agencies and clear coordination of responsibilities, the risk of fragmentation and over-regulation remains high. See QAA, *Country report: the Republic of Ireland*, n.p., Gloucester (UK), 2017. Trifirò, F., *The importance of cross-border cooperation...*, cit. Hopbach, A., UNESCO-OECD Guidelines, cit. QAA, *UK Transnational Education in Malaysia...*, cit. as well as the mentioned Recommendation of the Council of the European Union, C/2025/3006, which states that: «6. Diverging national quality assurance arrangements still create complexity for transnational cooperation in higher education, hampering the development of joint educational programmes and limiting educational opportunities for higher education institutions and students. It is important that demonstrating compliance with formal requirements is balanced with ensuring an ongoing emphasis on and commitment to continuous improvement in education provision, which is central to quality assurance. 7. Existing instruments, such as the European Approach for Quality Assurance of Joint Programmes (European Approach), are highly valued by the higher education community and Member States, but implementation remains scarce due to divergent national approaches.».

5. The Italian Case: Current Framework, Potential and Critical Issues

The evolution of TNE is currently situated in a phase of profound transformation and it is increasingly required to address complex challenges such as the growing demand for tertiary education, competition for talent and resources, the digital and green transitions, and the need to ensure the quality and sustainability of transnational partnerships. In this context, the future scenarios of TNE appear as the outcome of a dynamic balance between harmonisation and diversity, cooperation and competition, flexibility, and regulation.

In the European context, the EHEA continues to represent the main reference framework for the evolution of TNE. The instruments developed within the Bologna Process and the ESG, qualification frameworks and recognition mechanisms based on the Lisbon Recognition Convention, provide a foundation of mutual trust that enables the development of increasingly advanced forms of transnational cooperation. However, significant gaps appear to persist between principles shared at European level and the practices adopted in different national contexts, particularly about the regulation and quality of TNE⁵⁶.

A significant acceleration in this direction appears to stem from the European Universities Alliances which – as noted – currently constitute one of the most advanced laboratories for experimenting with models of structural transnational cooperation, aiming to overcome purely project-based and fragmented approaches, and instead promoting long-term integration in areas such as governance, educational provision, mobility, research, and QA. From this perspective, TNE is no longer limited to individual programmes or initiatives, but is configured as a transnational institutional ecosystem, within which new forms of inter-university campuses, flexible curricula (e.g. Recognition of Prior Learning – RPL – or micro-credentials) and joint qualifications emerge⁵⁷.

At global level, future scenarios for TNE are characterised by increasing attention to quality as an infrastructure of trust. In the absence of a binding international framework, the UNESCO–OECD Guidelines, the global standards of INQAAHE and the UNESCO/Council of Europe “Code of Good Practice in the Provision of Transnational Education” indicate convergence towards approaches based on cooperation between sending and host countries, the strengthening of institutional capacity and the protection of students.

For the Italian university system, these developments outline an ambivalent scenario, characterised by significant opportunities and persistent critical issues. On the one hand, the growing centrality attributed to TNE in national policies offers the opportunity to strengthen Italy’s role as a proactive actor in international academic cooperation. On the other hand, the lack of an organic regulatory and informational framework risks limiting the system’s capacity to fully capitalise on these opportunities and to ensure coherence among TNE initiatives, quality instruments and development objectives. In this respect, the development of more structured national information systems on outgoing TNE could contribute significantly to improving transparency, monitoring, and policy coordination. While

⁵⁶ Cirlan, E., Tsiligiris, V., Skjerven, S. A., et al., *In addressing TNE...*, cit.

⁵⁷ Including the perspective of the European Degree and the forthcoming introduction of the European Degree Label See *supra*, note 8.

information concerning incoming TNE initiatives in Italy is relatively accessible through institutional channels, comparable data, and system-level mapping of Italian TNE activities abroad remain limited. Strengthening information provision in this field would not only support evidence-based policymaking and QA processes, but also enhance the international visibility and strategic positioning of Italian HEIs engaged in transnational cooperation.

Experiences gained within JPs and, more recently, sustained participation in the European Universities Alliances may act as drivers for the evolution of outgoing Italian TNE, fostering the adoption of more integrated governance models and more mature transnational Quality Assurance practices. Overall, the future scenarios of Italian and international TNE will depend on the capacity of HE systems to integrate strategic vision, quality, and cooperation, moving beyond fragmented approaches focused exclusively on regulatory compliance. From this perspective, TNE is configured not only as an instrument of internationalisation, but as a structural lever for the transformation of university systems, which are called upon to operate in increasingly interconnected and interdependent contexts.

6. Conclusions

The analysis carried out highlights how TNE has progressively established itself as a structural dimension of contemporary HE, going well beyond the role traditionally attributed to the international mobility of students. It emerges as a complex space of interaction among academic cooperation, public policies, the quality of educational provision and institutional strategies, in which opportunities for innovation intertwine with persistent governance criticalities⁵⁸.

From both a conceptual and operational perspective, the plurality of TNE models (from collaborative forms, such as joint programmes and double qualifications, to more institutionalised modalities such as branches and branch campuses) reflects the diversity of national contexts and the strategic priorities of HE systems⁵⁹.

In this scenario, quality emerges as the pivotal element upon which the long-term sustainability of TNE depends. The analysis of international and European instruments shows a growing convergence towards approaches based on mutual trust, cooperation among agencies and shared responsibility between sending and host countries. Nevertheless, a significant gap remains between the principles enshrined in the main reference documents (from the ESG to the UNESCO–OECD Guidelines) and their effective implementation within national contexts, particularly in more complex and multi-level TNE cases.

The Italian case exemplifies these tensions. On the one hand, the increasing institutional attention devoted to TNE, as evidenced by national internationalisation strategies and the investments envisaged under the PNRR, signals a clear willingness to strengthen Italy's role in international academic

⁵⁸ Healey, N., M., The end of transnational education..., cit. Knight, J., McNamara, J., *Transnational education...*, cit. Carvalho, N., Rosa, M. J., Amaral, A., *Cross-Border Higher Education and Quality Assurance...*, cit.

⁵⁹ Knight, J., McNamara, J., *Transnational education...*, cit. Trifirò, F., *The importance of cross-border cooperation...*, cit. Hopbach, A., *UNESCO-OECD Guidelines*, cit.

cooperation. On the other hand, the persistence of an outdated regulatory framework and a fragmented information system limits the capacity to fully enhance existing initiatives, monitor their outcomes, and coherently integrate TNE into the quality policies of the university system.

Looking ahead, the European Universities Alliances together with projects related to joint European qualifications represent an important step in the evolution of TNE, promoting more integrated forms of transnational cooperation and coordinated QA mechanisms. From the Italian perspective, this evolution builds upon a regulatory framework that already contains relevant references concerning international educational provision, quality, and cooperation, although these instruments remain only partially adequate to capture the complexity of emerging TNE practices.

Overall, TNE is confirmed as a strategic lever for the transformation of HE systems, but its future development will depend on the capacity to combine strategic ambition, quality, and sustainability. Specifically for the Italian context, this will entail not only strengthening coordination among institutional actors and updating regulatory and informational instruments, but also adopting approaches inspired by the principles of proportionality, simplification, and progressive harmonisation of national systems, in coherence with the framework of the European Higher Education Area and with the evolution of European Quality Assurance instruments.

Bibliography

Alam, F., Alam, Q., Chowdhury, H. et al., *Transnational education: benefits, threats and challenges*, "Procedia Engineering", Vol. 56, Elsevier, 2013, pp. 870-874.

Altbach, P. G., Knight, J., *The Internationalization of Higher Education: motivations and realities*, "Journal of Studies in International Education", Vol. 11, 2007, pp. 290-305.

Bannier, B. J., *Global trends in Transnational Education*, "International Journal of Information and Education Technology", Vol. 6, no. 1, 2016, pp. 80-84.

Bordogna, C. M., *Are Degree-awarding Institutions doing enough to Support the Implementation of Quality Assurance in Transnational Higher Education Partnerships?*, "Journal of Studies in International Education", Vol. 24, no. 3, 2019, pp. 371-386.

Bosire, J., Amimo, C., *Emerging issues and future prospects in the management of Transnational education*, "International Journal of Higher Education", Vol. 6, no. 5, 2017, pp. 143-154.

Buizza, R., *Analisi delle co-pubblicazioni tra università italiane e britanniche nel periodo 2011-2020*, <https://innovitalia.esteri.it/AJAXMediaGallery/GetAllegatoStream/cff9267c-9b9d-4391-b33f-0ec22fa7f2fd/originale> [last accessed 5 February 2026].

Carvalho, N., Rosa, M. J., Amaral, A., *Cross-Border Higher Education and Quality Assurance. Results from a Systematic Literature Review*, "Journal of Studies in International Education", Vol. 27, no. 5, pp. 695-718.

Centro di Informazione sulla Mobilità e le Equivalenze Accademiche (CIMEA), *Automatic Recognition in the Adriatic Region Project (AdREN), Transnational Education in 4 countries of the Adriatic region: Regulation, quality assurance and information provision*, CIMEA, n.p., 2022.

Cirlan, E., Tsiligiris, V., Skjerven S.A., et al., *In addressing TNE governance challenges, students are key*, University World News, 2025. <https://www.universityworldnews.com/post.php?story=20250617155942227>, [last accessed 9 Jun 2026].

European Higher Education Area, *Bologna Follow-Up Group (BFUG), Cross-Border Quality Assurance (CBQA)* <https://ehea.info/page-peer-group-C-QA> [last accessed 3 February 2026].

European Union External Action, *Council of the European Union, Recommendation C/2025/3006*, <https://eur-lex.europa.eu/eli/C/2025/3006/oj/eng>, [last accessed 9 Jun 2026].

European Association for Quality Assurance In Higher Education, *ENQA/ASEAN Project*, https://euinasean.eu/wp-content/uploads/2024/11/Comparability-Study-of-AQAF-_-ESG-Web.pdf [last accessed 3 February 2026].

ENQA/SIACES Project <https://www.enqa.eu/projects/alignment-of-siaces-enqa-quality-guidelines-in-higher-education-for-strengthening-bi-regional-trust-esg-pbp-alignment/> [last accessed 3 February 2026].

European Quality Assurance Register for Higher Education (EQAR), *European Approach for Quality Assurance of Joint Programmes (EA)*, <https://www.eqar.eu/kb/joint-programmes/> [last accessed 30 January 2026].

European Association for Quality Assurance in Higher Education (ENQA), European Students' Union (ESU), European University Association (EUA) et al., *Key Considerations for Cross-Border Quality Assurance in the European Higher Education Area*, Bruxelles (Belgium), 2017. <https://www.eqar.eu/kb/cross-border-qa/key-considerations/> [last accessed 3 February 2026].

European Association for Quality Assurance in Higher Education (ENQA). *QACHE Toolkit* <https://www.enqa.eu/publications/a-toolkit-for-quality-assurance-agencies/> [last accessed 3 February 2026].

European Association for Quality Assurance in Higher Education (ENQA), European Students' Union (ESU), European University Association (EUA), et al., *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, https://ehea.info/media.ehea.info/file/ESG/00/2/ESG_2015_616002.pdf [last accessed 30 January 2026].

European Commission, *European Universities alliances and their partners* <https://education.ec.europa.eu/education-levels/higher-education/european-universities-initiative/map> [last accessed 30 January 2026].

European Commission, *Blueprint for a European Degree and to the ongoing work for the establishment and introduction of a joint European label* <https://education.ec.europa.eu/education-levels/higher-education/joint-european-degree/working-towards-a-joint-european-degree> [last accessed 30 January 2026].

Gover, A., Blackstock, D., *Protecting the interests of students on transnational education programmes: the role of transparent quality assurance*, 2023. <https://www.enqa.eu/publications/protecting-the-interests-of-students-on-transnational-education-programmes-the-role-of-transparent-quality-assurance/> [last accessed 9 Jun 2026].

Grumbainaitė, I., Colus, F., Buitrago Carvajal, H., *Report on the outcomes and transformational potential of the European Universities initiative*, Publications Office of the European Union, Lussemburgo, 2025.

Healey, N. M., *The end of transnational education? The view from the UK*, "Perspectives: Policy and practice in Higher Education", Vol. 24, no. 3, 2020, pp. 102-112.

Healey, N. M., *Transnational education and domestic higher education in Asian-Pacific host countries*, "Pacific-Asian education: A journal about education in the Pacific circle countries", Vol. 29, 2017.

Ho Mok, K., Khai, T.S. *Transnationalization of higher education in China and Asia: quality assurance and students' learning experiences*, "Asian Education and Development Studies", Vol. 13, no. 3, 2024, pp. 208-226.

Hopbach, A., *UNESCO-OECD Guidelines for Quality Provision in Cross-border Higher Education. Analysis and recommendations to move forward*, 2022. <https://unesdoc.unesco.org/ark:/48223/pf0000389910>, [last accessed 9 Jun 2026].

International Network for Quality Assurance Agencies in Higher Education (INQAAHE), *International Standards and Guidelines for Quality Assurance in Tertiary Education (ISG)*, <https://www.inqaahe.org/wp-content/uploads/2024/05/INQAAHE-International-Standards-and-Guidelines-ISG.pdf> [last accessed 30 January 2026].

Jean Francois, E., Avoseh, M. B. M., Griswold, W., *Perspectives in Transnational Higher Education*, Sense Publishers, Rotterdam (Holland), 2016.

Kleibert, J. M., Bobée, A., Rottlieb, T., et al., *Transnational education zones: Towards an urban political economy of 'education cities'*, "Urban Studies", Vol. 58, no. 14, 2021, pp. 2845-2862

Knight, J., *Higher Education Crossing Borders: A Guide to the Implications of the General Agreement on Trade in Services (GATS) for Cross-border Education*, COL/UNESCO, Francia, 2006.

Knight, J., McNamara, J., *Transnational education: a classification framework and data collection guidelines for international program and provider mobility (IPPM)*, British Council, 2017.

Knight, J., *Transnational education remodeled: toward a common TNE framework and definitions*, "Journal of Studies in International Education", Vol. 20, no. 1, 2015, pp. 34-47.

Lamers-Reeuwijk, A.M., Admiraal, W.F., van der Rijst, R.M., *Expatriate academics and transnational teaching: the need for quality assurance and quality enhancement to go hand in hand*, "Higher Education Research & Development", Vol. 398, no. 4, 2020, pp. 733-747.

Lantero, L., Finocchietti, C., Gitto, E., et al., *Foreign schools in Italy and Italian schools abroad legislation, characteristics and recognition of qualifications*, CIMEA, 2021. https://www.cimea.it/Upload/Documenti/5278_Foreign%20schools%20in%20Italy_DEF_22.07.21.pdf, [last accessed 9 Jun 2026].

Manacorda, E., Gabaglio, L., Iannaccone, S., *UK-IT Best + Shape Project: final report*, Galileo servizi editoriali srl, 2023. https://www.galileonet.it/wp-content/uploads/2023/02/UK_libro_stampa_web.pdf, [last accessed 9 Jun 2026].

Mediterranean Automatic Recognition Network Project (MAREN), *Transnational education in the Adriatic and Mediterranean regions*, CIMEA, 2024. <https://automaticrecognitionnetworks.info/wp-content/uploads/2024/03/Pubblicazione-Maren-TNE.pdf> [last accessed 9 Jun 2026].

Ministry of University and Research (MUR), *Strategy for the Internationalisation of the Italian University System 2024–2026* <https://www.mur.gov.it/sites/default/files/2024-09/Strategia%20Internazionalizzazione%20MUR%202024-2026.pdf> [last accessed 30 January 2026].

Onița, H., Gvritishvili, A., Maruszczak, J., *Quality Assurance Fit for the Future - Students' perspective*, 2023, <https://esu-online.org/publications/quality-assurance-fit-forthe-future-studentsperspective/> [last accessed 3 February 2026].

Organisation for Economic Co-operation and Development (OECD), *Guidelines for Quality Provision in Cross-Border Higher Education*, <https://unesdoc.unesco.org/ark:/48223/pf0000143349> [last accessed 30 January 2026].

Quality Assurance Agency for Higher Education (QAA), *Quality Evaluation and Enhancement of UK Transnational Higher Education*, 2024, <https://www.qaa.ac.uk/international/transnational-education/quality-evaluation-and-enhancement-of-uk-tne> [last accessed 9 Jun 2026].

Quality Assurance Agency for Higher Education (QAA), *UK Transnational Education in Malaysia, Gloucester (UK)*, 2020 <https://www.qaa.ac.uk/international/transnational-education/country-reports> [last accessed 4 February 2026].

Quality Assurance Agency for Higher Education (QAA): *Country report: Hong Kong (Special Administrative Region of the People's Republic of China)*, Gloucester (UK), 2018 <https://www.qaa.ac.uk/international/transnational-education/country-reports> [last accessed 4 February 2026].

Trifirò, F., *Academic co-operation between the United Kingdom and Italy: Research a study on opportunities and challenges*, British Council, 2025, pp. 21-24.

Trifirò, F., *The importance of cross-border cooperation in the quality assurance of TNE: a comparative overview of national approaches to TNE*, "Higher Education Evaluation and Development", Vol. 13, no. 2, 2019, pp. 54-64.

UNESCO/Council of Europe, *Code of Good Practice in the provision of Transnational Education*, <https://rm.coe.int/code-of-good-practice-in-tne-adopted-on-22-october-2025/4880291d8e> [last accessed 30 January 2026].

UNESCO, Council of Europe, *Code of Good Practice in the Provision of Transnational Education*, 2025 <https://rm.coe.int/code-of-good-practice-in-tne-adopted-on-22-october-2025/4880291d8e> [last accessed 3 February 2026].

Wilkins, S., Huisman, J., *Transnational Education Redefined*, "International Higher Education", Vol. 121, 2024, pp.16-17.

The Quality Assurance Framework in the European Higher Education Area 2030: From Integration to Innovation

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| Abstract

The paper addresses the issue of quality assurance in the European Higher Education Area in alignment with excellence priorities and trends highlighted in the modern higher education landscape and the revised organizational excellence models. While the European framework for quality assurance rests upon institutional consolidation, an acquis of clearly defined processes and methodologies, criteria and tools, it seems that the characteristics of the economic and social context necessitate a fresh look amid higher education developments, the quest for sustainable pathways, technological omnipresence and disruptions. Hence, the study at hand attempts to identify those priorities that will rejuvenate quality assurance in the European Higher Education Area and build the foundations for global innovation.

Keywords: Quality Assurance, Europe, Excellence, Innovation, Higher Education

1. Introduction and Paper Objectives

The higher education sector has been one of the most dynamic in terms of growth globally. The global higher education market is estimated to reach 1.6 trillion USD by 2030² (in comparison to nearly 800 billion USD of 2024) driven by greater technology and AI (Artificial Intelligence) integration, lifelong learning and upskilling demand, and the growth of private higher education (mainly due to its flexibility in admission policies and career-oriented study programmes). The growth surge is marked by global enrollments, which, in 2023 reached 264 million students (most of whom study in Asia) and almost 7 million international students. Among the reasons for growth are population increases in various parts of the world, the high demand for advanced skills and (sustainable) economic development.

¹ Disclaimer: The views expressed in this paper are of the author only and do not by any means reflect the views of HAHE.

² Higher Education Market Size, Share & Trends Report, (2024-2030), available at: <https://www.grandviewresearch.com/industry-analysis/higher-education-market> [last accessed 10 February 2026].

The study at hand revolves around the notion that higher education institutions and the system of higher education at the national level need a professional way of management. That kind of management would not focus only on control and efficiency, but it would match the peculiar character of universities and their quality orientation. This need comes from the fact that universities differ in size, scope of activities, ambitions for global competitiveness and complexity in comparison to the past.

The operation of modern universities and higher education systems involves thousands of people, expensive infrastructure and sophisticated IT systems and interacting networks of producing value (e.g. innovation ecosystems). So, they cannot rely on informal methods or collegial governance, practices that might have worked in the past. Their coordination today demands specialized managerial knowledge. In addition, universities navigate among paradoxes. The shrinking of public funding pushes HEIs to operate efficiently and effectively, while they strive to attract high caliber academic staff and students, which requires knowledge of strategic marketing. Balancing these two conflicting factors requires an internal coordinating mechanism, which is management. Moreover, the responsible higher education policy bodies and society care for transparency and excellent performance that can be monitored through managerial tools and relevant metrics. Then, any decisions would be grounded on evidence.

For the last few years, higher education institutions have been in a state of profound transformation. This transformation is driven by challenges, such as technology and its most advanced conceptualization (Artificial Intelligence-AI) (e.g. integration in the academic and administrative processes of universities, curricula redesign for strengthening graduates' employability, digital learning), demographic (declining student populations in several countries) and financial pressures (declining state funding), discussions on the value of higher education (need for demonstrating outcomes, program life cycle management, collaborations with stakeholders), the quest for sustainability (sustainability courses, sustainability perspectives in research, responsible management frameworks and relevant Key Performance Indicators-KPIs), the need for building resilience (ability to navigate and maintain operation in erratic conditions, such as escalating conflicts, political shifts and interventions), responsible citizenship and democratic preservation (enhance and maintain the democratic profile of societies, steer a culture of fairness, meritocracy and equal opportunities for all)³. As a result of these challenges, universities have been reflecting on their mission and adjusting their governance systems, structure and academic functions with reference to the provision for high quality education, research and social contribution.

The question that arises at this point is why we specifically need quality management. Simply because higher education is a quality-centered system and thus, quality management (apart from the technical/hard requirements) offers the necessary cultural/soft elements needed to support its operation. Total Quality Management (TQM) constitutes a management philosophy that does not threaten education and aims not to contrast traditional academic values. It aims to steer university operations in a complex global setting. TQM is not to be confused with complexity and an over emphasis on regulations and procedures. If this happens, then quality has failed and those responsible would have to investigate why this happened. The essence of TQM is organizational transformation built on personal change. Personal change will come from the profound understanding of TQM through education, training, experience and a lot of reflection. Then, quality becomes an everyday way of thinking and acting, thus behaving.

³ Karakhanyan, S., Kinser, K., *Global Trends in Tertiary Education QA: Challenges and Opportunities in Internal and External QA*, Brill, Leiden, 2025.

Great management scholars, like Deming, Juran, Crosby, Schein and Senge agree that quality is a mindset, it is primarily human behavior and then, managerial philosophy and technical methodology. It is only when quality becomes a part of personal identity that it is not a tool but a value that drives behaviors, decisions and relationships. High performance follows as a natural outcome of a properly cultivated culture.

Again, someone could argue that adopting TQM in higher education is controversial, because it imposes a business model logic into an academic setting. This reflects a simplistic and a very narrow knowledge of TQM often combined with “hidden” organizational immaturity to embrace the quality mindset. This immaturity may take the form of identified concerns, such as:

- a)** the perception of the threatened academic freedom because of the standardization of processes (however, quality management focuses on standardizing the steps of processes and not academic choices or learning content or student outcomes). A quality-oriented institution pursues a teaching process with clear steps that guarantees the achievement of learning outcomes for its students. The teaching staff does not have any constraints in crafting personalized learning paths and selecting content for students.
- b)** the over-emphasis on data (however, it is evidence-based thinking that protects universities from individually motivated decisions or other interventions and allows for a concrete continuous improvement plan with clear goals, time frames and responsibilities),
- c)** the role of student as a customer (TQM views students as primary receivers and co-producers of educational services, thus there is a shared responsibility for quality and the overall educational experience).
- d)** increased disappointment caused by the need for quick results (quality management as a quality philosophy does not produce quick fixes or offer shortcuts for excellence, it takes time to bear fruit). Overall, quality is the path for excellence. TQM offers a cultural framework for institutional transformation (kaizen), and its results are maximized when it is used in combination with modern agile practices, biology informed management and technological applications⁴.

The developments in the higher education context underline the strong need for quality assurance systems to continue securing relevance, comparability and trust and be safe navigators for universities in their quest for excellence. For instance, the expansion of higher education in the form of new universities and higher enrollment numbers is not translated automatically to similar governance systems, resources and academic quality among them. This means that a mechanism is needed to assure some (at least) minimum quality criteria and fundamental characteristics for efficient and effective academic and organizational operation. The same applies for the case of various higher education institutional types (e.g. private, microcredential providers, alliances) in which quality assurance is entrusted with

⁴ Anninos, L. N., Dahlgaard-Park S. M., Dahlgaard J. J., *Leveraging AI and Neuroscience: a Transformative Leadership Paradigm for achieving Sustainable Excellence*, KSQM-QMOD-ICQSS 2025 Joint International Conference, Seoul, Korea, 26/9/2025-28/9/2025.

Anninos, L. N., *Towards the “Homo Deus” excellence perspective: Investigating the potential use of neuroscientific findings and technology for smart services*, “International Journal of Quality and Service Sciences”, Vol. 11, no. 4 2019, pp. 542-558.

the responsibility of safeguarding consumer protection and accountability. However, the value of a comprehensive quality assurance approach would be higher if it transcended the narrow scope of a compliance exercise.

Quality assurance systems provide solid proof that academic qualifications meet certain standards and contribute to internationalization through student mobility and partnerships among institutions and other economic and social entities in the form of alliances that expand the horizon of higher education and offer greater possibilities to students⁵. Further on, as online and hybrid modes of higher education are growing, it is crucial that quality assurance frameworks set certain requirements, for example, in AI teaching and learning. This is also related to the transition towards skill-based economies in which the possession of specific hard and soft skills becomes more important than the traditional degrees for employment.

Quality assurance, in general, is expected to become more focused on results (e.g. learning outcomes, employability, institutional impact), integrate technology (data collection and analysis in real time, performance monitoring boards), align itself with global goals (e.g. SDG) and the need for mutual recognition in a globalized context (e.g. European Standards and Guidelines-ESG) but it should also steer evidence based decision-making (e.g. KPI dashboards, analytical learning) and ensure university transformation (e.g. quality culture, stakeholder engagement, innovation in academic and administrative functions) as compliance is not enough for achieving excellence in the long term.

Taking into account the aforementioned developments in the field of higher education, the study at hand presents the European approach for quality assurance in higher education and discusses how it could evolve from a compliance exercise into a quality framework for the pursuit of excellence, by utilizing critical features from business excellence frameworks, such as the European Foundation for Quality Management (EFQM) model that provide the managerial infrastructure for implementing TQM.

2. Quality assurance in the European higher education

Quality in higher education is a transformative, human-centered mindset and a set of behaviors – both scientific and administrative – that, when combined with appropriate systems, aim for the optimal performance of an institution's academic and organizational pillars. Quality is realized through the convergence of specific intellectual values, administrative practices, and technical procedures⁶. The process of quality assurance involves continuous internal and external evaluations designed to foster constant improvement and accountability.

Central to the success of building quality are managerial knowledge and leadership, which are critical factors in advancing an institution's "quality maturity" and ensuring that its processes align with a

⁵ Council of the European Union. *Council Recommendation of 12 May 2025 on a European quality assurance and recognition system in higher education (C/2025/3006)*, "Official Journal of the European Union", 28 May 2025 <https://eur-lex.europa.eu/eli/C/2025/3006/oj/eng> [last accessed 10 February 2026]

⁶ Anninos, L. N., Kostopoulou, G., *Towards a new identity of Greek higher education*, in Gavrilidou, Z., Marsidou, S., Gavaki, S., (eds.), *2005-2021 Quality Assurance in Greek HEIs: From institutional evaluation to planning agreements: Challenges and Perspectives*, Quality Assurance Unit, Democritus University of Thrace, Komotini 2022, pp. 26-51.

genuine quality culture⁷. The higher the quality maturity is, the higher the alignment of processes and mechanisms with quality culture. Furthermore, the sincere adoption of quality as a core value by both leadership and the academic community is considered the most vital step toward a structured quality assurance process. Ultimately, effective quality assurance serves as a prerequisite for accreditation, which determines an institution's eligibility for legal operation and public funding⁸.

In Europe, quality transformation of higher education has been officially supported by the Bologna declaration and a noteworthy number of European countries. Since then, the European framework for internal and external quality assurance in higher education has been the result of gradual development. The European Standards and Guidelines for Quality Assurance in Higher Education were presented in 2005, and since then (currently in their 2015 revised edition) they provide the reference point for internal and external quality assurance in the European Higher Education Area (EHEA).

According to the core principles of ESG, quality assurance is a primary responsibility of Higher Education Institutions (HEIs). ESGs are suitable for diverse higher education systems, institutions, study programmes and students, the cultivation of a quality culture, and they consider the needs and expectations of students and other stakeholders. They focus on teaching and learning, they are oriented towards the improvement of quality of higher education in the EHEA and support trust, a basic precondition for recognition and mobility, and they also provide information on quality assurance in the EHEA. The ESGs are organized into three modules that form a comprehensive cycle of quality⁹ (Table 1):

Table 1 - The ESG 2015 modules

Internal quality assurance: how quality should be managed internally	External quality assurance: how external agencies evaluate the internal processes of HEIs	Quality Assurance agencies: standards for systematically demonstrating compliance with ESG
1.1 Policy for quality assurance	2.1 Consideration of internal quality assurance	3.1 Activities, policy and processes for quality assurance
1.2 Design and approval of programmes	2.2 Designing methodologies fit for purpose	3.2 Official status
1.3 Student-centred learning, teaching and assessment	2.3 Implementing processes	3.3 Independence
1.4 Student admission, progression, recognition and certification	2.4 Peer-review experts	3.4 Thematic analysis
1.5 Teaching staff	2.5 Criteria for outcomes	3.5 Resources
1.6 Learning resources and student support	2.6 Reporting	3.6 Internal quality assurance and professional conduct
1.7 Information management	2.7 Complaints and appeals	3.7 Cyclical external review of agencies

⁷ Anninos, L., N., *Overcoming complacency through quality intelligence in Greek higher education: The critical role of academic leadership*, in Baporikar, N., and Sony, M., (eds.) *Quality management principles and policies in higher education*, IGI Global, Hershey, PA 2020, pp.121-140.

Philip, B. Crosby, *Quality is free: The art of making quality certain*, McGraw-Hill, New York 1979.

⁸ Vlasceanu, L., Grünberg, L., Pârlea, D., *Quality Assurance and Accreditation: A Glossary of Basic Terms and Definitions*, UNESCO, Bucharest, 2007.

⁹ ENQA, *European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, 2015.

https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf [last accessed 10 February 2026].

Internal quality assurance: how quality should be managed internally	External quality assurance: how external agencies evaluate the internal processes of HEIs	Quality Assurance agencies: standards for systematically demonstrating compliance with ESG
1.8 Public information		
1.9 On-going monitoring and periodic review of programmes		
1.10 Cyclical external quality assurance		

While it is pertinent to reiterate that ESGs are not a static but a dynamic tool for quality assurance that transforms itself to better serve the changing requirements for excellence in higher education, several points constitute areas for further discussion despite their popularity and influence.

First, ESGs *focus* on universities` academic pillar. A comprehensive quality assurance framework means that universities are expected to design, implement and sustain a comprehensive quality management system permeating both pillars (academic and organizational). The key point here to understand is that those two pillars interact, define outcomes and produce value. Thus, if university excellence is sought, then a quality assurance approach that focuses on the one over the other pillar seems unsuitable and inadequate. For instance, suppose that the academic staff of a university department identifies a need for offering a study program on “HR analytics for public organizations” because an increasing number of public sector entities seek to employ graduates with relevant skills and a critical mass of students is interested in attending such a program. The academic staff would engage in the design of the program, they would discuss teaching methods and assessment, the course content, they would benchmark against similar study programs from abroad, and would be responsible for teaching, supervising and supporting students once the program has started. Following the formation of the idea about a new study program, several organizational tasks would also have to be conducted to allow for the smooth operation of the program. These tasks would include financial and human resources planning, preparations for quality assurance and accreditation, infrastructure support, governance and decision-making procedures, which all of them fall into the organizational pillar of the university. Hence, it is the interaction of both pillars that transforms an academic endeavor into a quality study program aligned with the needs of the labor market that enhances student learning, which further strengthens university reputation. So, the question that arises at this point is whether a university would benefit from a broader quality management framework for excellence (with guidelines and support) handling managerial issues. This need not be prescriptive (like a checklist) and dictate one proper way to manage a university but allow each university to determine its own path for excellence. Then, the added value of ESGs in university quality assurance would be higher, because it would act as an antidote to managerial ignorance and experimentation which impact academic operation and sometimes produce superficial quality results.

The next area of concern is the *superficial compliance* of higher education institutions with quality requirements and not their actual integration into the institutional internal quality assurance system. Superficial compliance may include the production of quality assurance policies (from usually copied templates) not implemented in daily academic practice and other quality assurance reports for external evaluation, minimum staff engagement in quality assurance processes (last-minute mentality)

focusing on data collection only, etc. This issue may have an even larger impact in those cases in which quality accreditation is used as a political tool to affirm a “fake” orientation to excellence and quality improvement.

In addition, HEIs generally complain about *bureaucracy* and an *additional administrative burden* that takes resources away from their academic operation¹⁰. This is not only related to ESGs but to quality assurance in general and it happens because institutions need to collect data, documents, reports and prove that they have aligned quality procedures and processes. However, collecting papers is not synonymous with improvement and the process of adding more controls does not mean that the root causes of problems are identified and cured. Complicated processes denote low quality because quality aims to process simplification and as such, bureaucracy indicates errors and failures. Also, ESGs are sometimes seen as a strict control mechanism to assure compliance, something that creates the impression of imposing limitations on university autonomy. Again, this has to do with how universities perceive quality and how they choose to implement it. If they impose more rules, focus on avoiding mistakes instead of improvement and create a poorly designed quality mechanism with greater complexity, then quality is misinterpreted as a burden.

Another remark is the fact that ESGs are made to be used by all *types of higher education institutions*, which may raise complexities in the case of small or specialized institutions (vocational or on-line universities). While the universal character of ESGs is a positive feature, their scope would have to be interpreted within specific contexts (e.g. vocational, digital). In addition, it is questionable whether all institutions have the organizational capacity to operationalize ESGs (e.g. availability of quality assurance units) and certainly ESGs are more suitable for the “traditional” university type. ESGs could include, for example, specific guidelines and metrics particularly for small or vocational or on-line universities.

Student-centered learning may well be a priority of ESGs, but since they are not prescriptive and do not include specific indicators to assess learning quality, it leaves enough space for variation and interpretation of results not only of learning quality but also the actual outcomes of quality assurance in universities. Variation exists also in *student engagement* in quality assurance activities even though ESG emphasizes student participation¹¹. There may be universities that take quality assurance seriously and may have training mechanisms for students, processes for student evaluation of courses that are systematically applied as well as other systematic surveys (e.g. student satisfaction) and learning loops to utilize quality assurance results. On the contrary other institutions may disregard the students` role in quality assurance, apply fragmented student evaluation processes and withhold useful information for fear of changes.

Finally, the pace of changes in the higher education landscape seems to surpass the pace of ESGs adaptation (e.g. AI integration in higher education, sustainability, resilience, micro credentials)¹².

¹⁰ Harvey, L., Newton, J., *Transforming quality evaluation*, “Quality in Higher Education”, Vol. 10, no. 2, 2004, pp.149-165.

¹¹ E4 Group, *The ESG in the Changing Landscape of Higher Education*, 2020. https://www.eua.eu/downloads/publications/e4_statement_the_esg_in_the_changing_landscape_of_higher_education.pdf [last accessed 10 February 2026].

¹² European Commission, *A European Approach to Micro-Credentials*, 2022. <https://education.ec.europa.eu/sites/default/files/document-library-docs/european-approach-micro-credentials-higher-education-consultation-group-output-final-report.pdf> [last accessed 10 February 2026]. E4 Group, *The ESG in the Changing ...*, cit.

Despite these areas for concern, certain strategic priorities for enhancing quality assurance in higher education have been included in the 2025 Council recommendation on European quality assurance¹³. These refer to the need for supporting transformation of higher education (green and digital transition, demographic pressures), strengthening graduate tracking mechanisms, facilitating transnational collaboration (joint programmes, European Degree), and streamlining quality assurance procedures for reducing administrative burden. In this context, a revised version of ESGs is expected to appear in 2027 that would provide higher education with an updated framework for quality assurance¹⁴. Based on the key areas (digital and flexible learning, societal impact of higher education and inclusivity) for the 2027 revision, it is underlined that ESGs are being restructured and updated to ensure better alignment with the modern higher education context while their scope and implementation suitability remain the same. In addition, quality assurance is now emphasized as part of a larger frame that sets the circumstances for the promotion of social dimension and fundamental values for higher education. The ESGs also have an additional purpose, as they support various stakeholders' groups to continuously monitor and improve the education provided. Also, quality assurance continues to steer and allow for trust-based international collaboration.

The value of ESGs would be further maximized if they focused on the organizational university pillar as well and offered greater support for building and strengthening quality culture. Regarding this value maximization, the next section investigates how the evolution of business excellence models could offer ideas to further develop the European approach for quality assurance and create a comprehensive framework for university excellence.

3. Elevating Quality Assurance in Higher Education Towards TQM

The principles and theories of TQM, which originated in the USA and Japan, offer a framework for the organizational transformation of universities and a way to provide tangible evidence of excellence. This transformation is contingent upon the sincere adoption of quality as a core value by both institutional management and the academic community, ensuring it is reflected in daily practices and systems. To achieve that, a genuine shared commitment to purpose is needed. Furthermore, the challenges universities face in their pursuit of excellence should act as motivation for innovative thinking rather than obstacles. The conceptualization of universities as organizations and the development of TQM as a scientific field have contributed to making institutional evaluation a standard practice.

Since the 1990s, many global institutions have implemented TQM, though they have reported mixed results. For instance, Fox Valley College¹⁵ in the USA saw encouraging outcomes, including improved graduate absorption into the labor market, higher employer satisfaction, and enhancements to the

¹³ Council of the European Union, *Council Recommendation of 12 May 2025 on a European quality assurance and recognition system in higher education (C/2025/3006)*. "Official Journal of the European Union", 28 May 2025. <https://eur-lex.europa.eu/eli/C/2025/3006/oj/eng> [last accessed 10 February 2026].

¹⁴ Biaggi, C., *What do higher education institutions want from quality assurance tools?* European University Association, Expert Voices, 2024. <https://www.eua.eu/our-work/expert-voices/what-do-higher-education-institutions-want-from-quality-assurance-tools.html> [last accessed 10 February 2026].

¹⁵ Narasimhan, K., *Organizational climate at the University of Branton in 1996*, "Total Quality Management", Vol. 8, no. 2-3, 1997, pp. 233-237.

learning environment¹⁶. Research involving 34 countries indicated that while adopting business-oriented quality models often led to improvements in non-academic processes, this practice was less effective in the areas of teaching and learning¹⁷. Nevertheless, when properly implemented, TQM serves as a powerful enabler for quality improvement, specifically regarding student performance and overall satisfaction¹⁸. Effective implementation requires the interaction of leadership, strategic planning, and a focus on the service receiver, as well as a reliance on universal participation, evidence-based management, and a commitment to continuous improvement¹⁹. Consequently, a question that arises at this point is whether quality assurance alone is adequate to steer universities' attempts towards excellence.

Quality assurance is the first step towards excellence (as it emphasizes the stability of processes) and reaches its full potential only when it is applied within a TQM framework. TQM rests upon soft and hard enablers, whose interaction produces outcomes²⁰. This is reflected in how the European University Association defines quality culture in which cultural/psychological elements and structural/managerial elements enhance quality and steer individual efforts towards excellence²¹. Thus, relying on quality assurance alone (especially only on the academic pillar) is not enough for universities pursuing excellence, as it may well certify that a university meets certain (usually minimum) standards, but it cannot drive cultural transformation and achieve excellence. To do that universities need a structured quality framework, such as a Business Excellence Model to support them as they proceed towards the full implementation of TQM.

Business Excellence Models (BEMs) are holistic frameworks that include a set of factors (enablers, results) often underpinned by specific values to provide a guide to organizations that aspire to implement quality. In addition, they may be complemented by diagnostic tools and self-assessment methodologies to help organizations through insight and foresight (analysis of results) in their journey towards excellence²². A BEM aims to guide an organization towards excellence and provide a structured path for self-assessment. The general idea of any business excellence framework is that any organization with fully committed leadership to the ideals and principles of quality, which formulates strategies, policies, practices and culture may achieve outstanding people, customer and societal results²³.

¹⁶ Kanji, G. K., Malek, A., Tambi, Bin A. *Total Quality Management in UK higher education institutions*, "Total Quality Management", Vol. 10, no. 1, 1999, pp. 129-153.

¹⁷ Brookes, M., Becket, N., *Quality management in higher education: A review of international issues and practice*, "International Journal of Quality Standards", Vol. 1, 2007, pp. 1-37.

¹⁸ Vamsi Krishna Jasti, N., Venkateswaran, V., Kota, S., *Total Quality Management in higher education: A literature review on barriers, customers and accreditation*, "The TQM Journal", Vol. 34, no. 5, 2022, pp. 1250-1272. Sakthivel, P.B., Rajendran, Raju, G., R., *TQM implementation and students' satisfaction of academic performance*, "The TQM Magazine", Vol. 17, no. 6, 2005, pp. 573-589.

¹⁹ Fotopoulos C. B., Psomas, E. L., *The Impact of 'Soft' and 'Hard' TQM Elements on Quality Management Results*, "International Journal of Quality & Reliability Management", Vol. 26 no. 2, 2009, pp.150-163.

Lagrosen, Y., Lagrosen, S., *The Effects of Quality Management - A Survey of Swedish Quality Professionals*, "International Journal of Operations & Production Management", Vol. 25 no.10, 2005, pp. 940-952.

²⁰ Sahney, S., *Use of multiple methodologies for developing a customer-oriented model of total quality management in higher education*, "International Journal of Educational Management", Vol. 30, no. 3, pp. 326-353.

²¹ European University Association, *Quality culture in European Universities: A bottom-up approach*, European University Association, Brussels 2006.

²² Edgeman, R., Eskildsen, J., *International quality award models: Innovation enablers or inhibitors?* Proceedings of the 18th European Conference on Innovation and Entrepreneurship, Part 1, 2003, pp. 21-22.

²³ Anninos L. N., *The archetype of excellence in universities and TQM*, "Journal of Management History", Vol. 3 no. 4, 2007, pp. 307-321.

Hermel, P., Ramis-Pujol, J., *An evolution of excellence: some main trends*, "The TQM Magazine", Vol. 15, no. 4, 2003, pp. 230-243

Business excellence models provide the tools for measuring progress and outcomes of TQM implementation, they translate TQM values into criteria, they offer self-assessment guides, they help in unifying quality initiatives in a common strategic framework, they focus on achieving multiple results for all stakeholders and they relate quality practices to goals while they can also unveil gaps in quality processes that quality assurance criteria cannot point out. Applying a BEM is the basis for the full adoption of TQM and the acquisition of competitive advantage. Overall, quality assurance has a narrower focus and refers to processes and their stability while a BEM goes beyond compliance, supporting organizations towards strategic improvement and excellence.

The European approach for quality assurance in higher education may further evolve through the integration of certain elements from business excellence models. Business excellence models have a broader scope when adopted for higher education institutions and possess a stronger orientation towards continuous improvement and innovation in contrast with the ESG criteria.

While universities are quite different from businesses, they do constitute complex organizations that need to be managed. A university quality assurance framework that refers to both pillars would mean that university leaders would have a more profound and broader understanding of university strategy. This does not mean that a new approach for quality assurance would contradict university autonomy, namely a university's right to determine its management and governance, but it would provide a structured reference path for self-assessment and learning. The European approach does include a self-assessment phase but not in a structured and uniform way for all universities, some of which do not even have a comprehensive quality assurance framework aligned with their strategy. This has catastrophic consequences for the internal quality assurance system, because it does not have/develop the ability to learn from failure or provide robust methodologies for curing weaknesses. Contrary to the traditional quality assurance process which has a reactive character examining compliance to standards, BEMs promote proactive self-assessment as a tool for continuous improvement and strategic learning. This leads to the gradual development of universities' internal quality assurance system and overall quality maturity. Moreover, the revised versions of popular BEMs emphasize certain (new) organizational priorities for sustainable excellence, namely sustainability, agility and resilience and technology-mediated quality intelligence.

The first one, sustainability, refers to a more conscious growth that takes into consideration the rights and interests of future generations by adopting a balanced focus on the economy, society and environment²⁴. As with business organizations, nowadays there can be no excellent universities, if they neglect sustainability, simply because excellence and sustainability are interrelated²⁵.

A significant number of higher education institutions have already expressed their eagerness to align with the 2030 Agenda for Sustainable Development, several initiatives have been undertaken focusing on integrating sustainability aspects in the academic and organizational university pillars (such as the Principles for Responsible Management and Education-PRME), while relevant criteria have been included in some accreditation models (e.g. AACSB, AMBA) and ranking systems (e.g. Times Higher

²⁴ World Commission on Environment and Development, *Our common future* (Oxford Paperbacks), Oxford University Press, Oxford, New York, 1987.

²⁵ Anninos, L. N., Chytiris, L., *The sustainable management vision for excellence: Implications for business education*, "International Journal of Quality and Service Sciences", Vol. 4, no. 1, 2012, pp. 61-75.

Education Impact). Steady progress has been documented but further improvements can be achieved in three fronts, namely university operations, academic activities, management and governance. Hence, the interest of HEIs for sustainable development and the alignment of their operation with specific goals remains a challenge and a proof of pursuing excellence. This presupposes strategic intelligence and systemic awareness from institutional leadership. Leaders can contribute to sustainable development through the development of a suitable governance system (culture and commitment), the monitoring of the impact of their institutional activities on the environment, the cultivation of students' abilities to deal with changes and promote the implementation of sustainable development goals and collaborations with other stakeholders to improve social welfare²⁶.

Another key priority for sustainable excellence is agility and resilience. Agility is also highlighted in BEMs as a key organizational feature that helps in achieving resilience from shocks and disruptive circumstances. Resilience is a valuable organizational feature that allows HEIs to navigate and maintain their operation in erratic conditions. A resilient university would be recognized by its capacity to productively respond to the changes that disrupt the expected pattern of events (for instance the onset of COVID19), while developing new capabilities to keep pace with changes and creating new opportunities. It is the combination of financial, technical, and social resources that lead an organization to success and competitiveness through the creation of value for customers and interested parties²⁷. Resilience appears in BEMs as a priority (need for a future-focused strategy, agile processes and innovation, sustainable performance) reminding that organizations should not focus solely on becoming best for the present, but also for the future.

Finally, quality intelligence refers to the level of personal excellence and its ripple effects within an organization. It blends values, attitudes, knowledge, and a holistic or universal outlook that inspires individuals to pursue continuous and structured improvement. Quality-intelligent leaders transform quality culture into tangible elements – such as systems, processes, knowledge, and skills (the “what”) – and into intangible dimensions like behaviors, attitudes, and mindset (the “how”) that ensure the delivery of quality services. If quality intelligence is combined with technology, its effects are maximized, because it responds to the need for transformation that universities need. It also shapes the overall study experience, which is ultimately evaluated by students against their expectations – formed through reputation, feedback, and personal needs – before the service is even delivered. Consequently, technology-mediated quality intelligence impacts a university's culture, operation and attained results²⁸ and acts as the accelerator that enables a university to achieve excellence faster, more consistently, and more sustainably.

So, the next question that arises at this point is whether and what can the European Approach for Quality Assurance in higher education learn from the evolution of BEMs and their revised versions. To answer that, we take the EFQM model as a representative BEM example (due to its wide acceptance and use), but first, it has to be pointed out that the implementation of any BEM can certainly heighten

²⁶ Besta, Ch., Anninos, L. N., *Sustainable development in higher education: Aligning ESG standards with the requirements of sustainable development – Trends and Challenges for Greek Higher Education*, Hellenic Authority for Higher Education, Athens, 2020.

²⁷ Tengblad, S., Oudhuis, M., (eds.), *The resilience framework – Organizing for sustained viability*, Springer, Singapore, 2018.

²⁸ Anninos, L. N., *Overcoming complacency through quality intelligence in Greek higher education: The critical role of academic leadership*, in Baporikar, N., Sony, M., (eds.) *Quality management principles and policies in higher education*, IGI Global, Hershey, PA 2020, pp.121-140.

quality awareness in an organization; there may be barriers (e.g. insufficient managerial commitment and resources, absence of comprehensive quality training and staff involvement) in their adoption, and finally, BEMs should not be considered as substitutes for addressing fundamental organizational and behavioral shortcomings.

Having said that, the EFQM model puts purpose, vision and the production of sustainable value at its core, something that highlights a clear link between organizational vision, mission, quality practices and the production of sustainable value for students and university stakeholders. Thus, the model provides a comprehensive management framework outlining the relation of vision to measurable outcomes (both academic and managerial), the significance of partnerships and resource management and a wider frame for integrating other institutional missions (e.g. research, social role) into the quality loop.

In addition, the model highlights the role of stakeholders to produce value. The new version of ESG puts particular importance on assuring stakeholder engagement in the continuous improvement cycle of organizations. However, ESG place strong focus on the role of students, while BEMs include a wider array of stakeholders, thus highlighting the social dimension of higher education and its impact as well, in alignment with the Environment Social Governance (ESG) framework.

Regarding improvement, the EFQM model emphasizes performance measurement, KPIs and evidence-based decision making in contrast with ESGs that do not prescribe any robust measurement framework. ESGs could offer clearer guidance of critical university KPIs (e.g. teaching quality, student satisfaction, graduation pace) and allow for benchmarking against peer institutions. Moreover, a major feature of the EFQM model is the RADAR logic (Results, Approach, Deployment, Assessment and Refinement) which offers a structured self-assessment and refinement tool meaning that each strategic decision would be based on data. ESGs on the other hand do not include any self-assessment tool.

The EFQM model pays particular attention to the assessment of leadership, culture and staff empowerment, whereas ESG refers only to staff qualifications but not organizational culture. Thus, ESG could benefit from evaluating leadership commitment to quality, staff recognition, well-being (staff engagement and development is tied to academic excellence), the encouragement of distributed leadership and shared responsibility for quality.

Moreover, improvement is also related to transformation and innovation. The EFQM model can support the technological transformation of universities and improve their innovation capacity because it supports the integration of technology with strategy, facilitates the evaluation of leadership commitment to innovation and can help universities locate the areas in which they can use technology to streamline their processes. Hence, ESGs could be enriched by focusing on assessing the potential for new ideas and innovation and the participation of universities in innovation ecosystems while placing a greater emphasis on the digital transformation of governance and their academic functions.

In addition, ESGs are more concerned with outcomes and policies, while EFQM focuses on how organizations design, manage, and improve their processes. So, by adopting a process perspective, HEIs would proceed in process mapping and optimizing, ensuring consistency among departments, reducing bureaucracy and improving student experience.

Finally, the new EFQM model integrates sustainability and societal contribution as core elements. ESGs could benefit by embedding sustainability aspects, the evaluation of institutional social impact and community engagement and the encouragement of responsible governance and ethical practices, into the quality assurance criteria. By doing so, universities would have even greater potential on aligning with the Environment, Society and Governance framework.

4. Conclusions

The European approach for quality assurance in higher education is at a crossroad. It will either evolve through the integration of critical organizational priorities, modern quality practices and a greater conceptual approach on the teachings of TQM or gradually lose its appeal if it maintains its narrow scope and does not provide a comprehensive framework for university excellence. That would happen because European higher education needs to proceed from quality assurance to continuous quality improvement, become more strategic, data-driven, stakeholder-centered, and future-oriented. So, it is not about meeting minimum standards but also thriving in a rapidly changing educational landscape.

By learning from the evolution of BEMs, results become more important than compliance and continuous assessment and improvement cycles replace excessive paperwork (uses already available data, KPIs drawn from daily practice) and contribute to making quality a habit. Quality becomes intertwined with strategy and is assessed based on how well it supports the strategic goals of universities. The emphasis shifts from administrative control to shared responsibility as BEMs assess the effectiveness of cross-departmental processes, team collaboration, information sharing and collective decision making because quality is everybody's responsibility (Deming) and it is not a department but a process that crosses departmental boundaries.

The greater focus on culture, leadership behaviors, staff empowerment and learning reduces the need for excessive rules and highlights that simplification is an enabler for quality. A BEM can unify all university initiatives for quality (i.e. ISO for administrative processes, ESGs for academic processes) into a single framework because all organizations must be understood as systems. After all, quality is produced by a system, and an organization must understand and manage all those that affect and are affected by it (namely its stakeholders and not just its customers). Finally, quality does not happen by accident, but it is always the result of a conscious and intelligent endeavor. This endeavor is the combination of personal excellence and technology, and this duality provides organizations with the intelligence to experience quality principles in evolutionary ways often expressed through future oriented strategies.

Bibliography

Anninos, L.N., *Overcoming Complacency through Quality Intelligence in Greek Higher Education: The Critical Role of Academic Leadership*, in Baporikar, N. and Sony, M. (eds), *Quality Management Principles and Policies in Higher Education*, Hershey, PA, IGI Global, 2020, pp. 121-140.

Anninos, L. N., *The Archetype of Excellence in Universities and TQM*, "Journal of Management History", Vol. 3, no. 4, 2007, pp. 307-321.

Anninos, L. N., *Towards the "Homo Deus" Excellence Perspective: Investigating the Potential Use of Neuroscientific Findings and Technology for Smart Services*, "International Journal of Quality and Service Sciences", Vol. 11, no. 4, 2019, pp. 542-558.

Anninos, L. N., Chytiris, L., *The Sustainable Management Vision for Excellence: Implications for Business Education*, "International Journal of Quality and Service Sciences", Vol. 4, no. 1, 2012, pp. 61-75.

Anninos, L. N., Dahlgaard-Park, S.M., Dahlgaard, J.J., *Leveraging AI and Neuroscience: A Transformative Leadership Paradigm for Achieving Sustainable Excellence*, KSQM-QMOD-ICQSS 2025 Joint International Conference, Seoul, Korea, 26–28 September 2025.

Anninos, L. N., Kostopoulou, G., *Towards a New Identity of Greek Higher Education*, in Gavriilidou, Z., Marsidou, S. and Gavaki, S. (eds), 2005–2021 *Quality Assurance in Greek HEIs: From Institutional Evaluation to Planning Agreements: Challenges and Perspectives*, Komotini, Quality Assurance Unit, Democritus University of Thrace, 2022, pp. 26-51.

Besta, C., Anninos, L. N., *Sustainable Development in Higher Education: Aligning ESG Standards with the Requirements of Sustainable Development – Trends and Challenges for Greek Higher Education*, Athens, Hellenic Authority for Higher Education, 2020 [in Greek].

Biaggi, C., *What Do Higher Education Institutions Want from Quality Assurance Tools?*, European University Association, Expert Voices, 2024. <https://www.eua.eu/our-work/expert-voices/what-do-higher-education-institutions-want-from-quality-assurance-tools.html> [last accessed 10 February 2026].

Brookes, M., Becket, N., *Quality Management in Higher Education: A Review of International Issues and Practice*, "International Journal of Quality Standards", Vol. 1, 2007, pp. 1-37.

Council of the European Union, *Council Recommendation of 12 May 2025 on a European Quality Assurance and Recognition System in Higher Education (C/2025/3006)*, "Official Journal of the European Union", 28 May 2025. <https://eur-lex.europa.eu/eli/C/2025/3006/oj/eng> [last accessed 10 February 2026].

Crosby, P. B., *Quality Is Free: The Art of Making Quality Certain*, New York, McGraw-Hill, 1979.

E4 Group, *The ESG in the Changing Landscape of Higher Education*, 2020. https://www.eua.eu/downloads/publications/e4_statement_the_esg_in_the_changing_landscape_of_higher_education.pdf [last accessed 10 February 2026].

Edgeman, R., Eskildsen, J., *International Quality Award Models: Innovation Enablers or Inhibitors?*, Proceedings of the 18th European Conference on Innovation and Entrepreneurship, Part 1, 2003, pp. 21-22.

ENQA, *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, 2015. https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf [last accessed 10 February 2026].

European Commission, *A European Approach to Micro-Credentials*, 2022. <https://education.ec.europa.eu/sites/default/files/document-library-docs/european-approach-micro-credentials-higher-education-consultation-group-output-final-report.pdf> [last accessed 10 February 2026].

European University Association, *Quality Culture in European Universities: A Bottom-Up Approach*, Brussels, European University Association, 2006.

Fotopoulos, C. B., Psomas, E.L., *The Impact of "Soft" and "Hard" TQM Elements on Quality Management Results*, "International Journal of Quality & Reliability Management", Vol. 26, no. 2, 2009, pp. 150-163.

Grand View Research, *Higher Education Market Size, Share & Trends Report*, 2030. Available at: <https://www.grandviewresearch.com/industry-analysis/higher-education-market> [last accessed 10 February 2026].

Harvey, L., Newton, J., *Transforming Quality Evaluation*, "Quality in Higher Education", Vol. 10, no. 2, 2004, pp. 149-165.

Hermel, P., Ramis-Pujol, J., *An Evolution of Excellence: Some Main Trends*, "The TQM Magazine", Vol. 15, no. 4, 2003, pp. 230-243.

Jasti, N. V. K., Venkateswaran, V. and Kota, S., *Total Quality Management in Higher Education: A Literature Review on Barriers, Customers and Accreditation*, "The TQM Journal", Vol. 34, no. 5, 2022, pp. 1250-1272.

Kanji, G. K., Malek, A., Tambi, A. B. A., *Total Quality Management in UK Higher Education Institutions*, "Total Quality Management", Vol. 10, no. 1, 1999, pp. 129-153.

Karakhanyan, S., Kinser, K., *Global Trends in Tertiary Education QA: Challenges and Opportunities in Internal and External QA*, Leiden, Brill, 2025.

Lagrosen, Y., Lagrosen, S., *The Effects of Quality Management: A Survey of Swedish Quality Professionals*, "International Journal of Operations & Production Management", Vol. 25, no. 10, 2005, pp. 940-952.

Narasimhan, K., *Organizational Climate at the University of Branton in 1996*, "Total Quality Management", Vol. 8, no. 2-3, 1997, pp. 233-237.

Sahney, S., *Use of Multiple Methodologies for Developing a Customer-Oriented Model of Total Quality Management in Higher Education*, "International Journal of Educational Management", Vol. 30, no. 3, pp. 326-353.

Sakthivel, P. B., Rajendran, G. and Raju, R., *TQM Implementation and Students' Satisfaction of Academic Performance*, "The TQM Magazine", Vol. 17, no. 6, 2005, pp. 573-589.

Tengblad, S., Oudhuis, M. (eds), *The Resilience Framework: Organizing for Sustained Viability*, Singapore, Springer, 2018.

Vlăsceanu, L., Grünberg, L., Pârlea, D., *Quality Assurance and Accreditation: A Glossary of Basic Terms and Definitions*, Bucharest, UNESCO, 2007.

World Commission on Environment and Development, *Our Common Future*, Oxford/New York, Oxford University Press, 1987.

Institutional Autonomy and Academic Freedom in Post-Soviet Countries: A Review of the Baltic and South Caucasus States

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| Abstract

This study examines the legal regulation and practical enforcement of institutional autonomy and academic freedom in the higher education systems of post-Soviet countries, with a particular focus on the Baltic States (Estonia, Latvia, Lithuania) and the South Caucasus (Georgia, Armenia, Azerbaijan). Higher education reforms in these regions aim to strengthen academic independence and enhance the degree of institutional autonomy, both of which are crucial for the proper functioning of modern universities. The article adopts a qualitative comparative approach, the analytical criteria and scope of which are set out in the following methodology section.

Comparative analysis reveals that the legal foundations of institutional autonomy and academic freedom are defined within legal acts of varying hierarchical levels. In some countries, these rights are enshrined in the constitution, whereas in others they are regulated by legal instruments subordinate to the constitution. This discrepancy can affect the effectiveness of their protection. Moreover, beneficiaries within the academic sphere – including faculty members, researchers, and students – often lack a clear understanding of the content and scope of these rights, which further complicates their practical enforcement.

The findings indicate that despite the existence of formal legal regulations, the level of protection for institutional autonomy and academic freedom varies significantly between countries. These variations are often influenced by legal nuances as well as a general lack of awareness and understanding of what academic freedom and institutional autonomy entail. This study underscores the critical role of legal instruments in the process of higher education reform and offers recommendations for improving the legal environment and its enforcement. Enhancing these frameworks will enable universities to maintain high academic standards and institutional independence.

Keywords: Institutional Autonomy, Academic Freedom, Higher Education, Post-Soviet Countries, Legal Framework, Higher Education Reform.

1. Introduction

Academic freedom and institutional autonomy are recognized as fundamental principles of contemporary higher education systems and are closely linked to the quality of teaching and research, the democratic governance of universities, and their broader societal mission¹. In European political and academic discourse, these principles are increasingly understood not merely as professional or sector-specific values, but as integral components of the broader constitutional order, grounded in human rights, the rule of law, and institutional accountability². At the same time, their legal definition and practical implementation are significantly shaped by national historical legacies, governance traditions, and the established relationships between the state and universities³.

In post-Soviet countries, the transformation of higher education systems has taken place within a particularly complex context⁴. The dismantling of the centralized governance model required not only legislative reforms, but also profound cultural and institutional changes aimed at moving away from a system characterized by hierarchical control, political oversight of academic activity, and the absence of genuine university self-governance⁵. Although a significant number of post-Soviet states have formally embraced the concepts of academic freedom and institutional autonomy – often in connection with processes of European integration – the extent to which these principles have been embedded in constitutional frameworks, sectoral legislation, and everyday institutional practice varies considerably across regions⁶.

This article examines these differences through a comparative analysis of the Baltic States (Estonia, Latvia, and Lithuania) and the South Caucasus countries (Georgia, Armenia, and Azerbaijan). Although all of these countries share a common Soviet legacy and have, in various ways, participated in European higher education reforms, including the Bologna Process, the trajectories of academic freedom and institutional autonomy have diverged markedly⁷. Early and consistent integration of the Baltic States into the European Union has contributed to the development of a governance environment in which constitutional guarantees, quality assurance mechanisms, and institutional practices function as mutually reinforcing elements⁸. By contrast, in the South Caucasus, the legal recognition of these principles often coexists with persistent practices of centralized governance and regulatory intervention.

The article devotes particular attention to the role of external quality assurance systems in shaping the practical boundaries of academic freedom and institutional autonomy. In European higher education policy, quality assurance is increasingly viewed as a development-enhancing mechanism based on institutional self-evaluation, collegial peer review, and the principle of fitness for purpose, as reflected in the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)⁹.

¹ Karran, T., *Academic Freedom in Europe: A Preliminary Comparative Analysis*, "Higher Education Policy", Vol. 22, no. 3, 2009, pp. 263-264.

² Council of Europe, *Academic Freedom and Institutional Autonomy*, Strasbourg, Council of Europe Publishing, 2020, pp. 9-12.

³ Altbach, P. G., Reisberg, L., and Rumbley, L. E. *Trends in Global Higher Education: Tracking an Academic Revolution*, Rotterdam, Sense Publishers, 2009, pp. 23-25.

⁴ UNESCO, *Higher Education in the Former Soviet Union: Problems and Prospects*, Paris: UNESCO Publishing, 2003, pp. 11-14.

⁵ Chankseliani, M., *Soviet Legacies in Higher Education Governance*, "Comparative Education Review", Vol. 57, no. 3, 2013, pp. 403-405.

⁶ Estermann, T., Nokkala, T., and Steinle, M., *University Autonomy in Europe II*. Brussels, European University Association, 2011, pp. 17-19.

⁷ EHEA Ministerial Conference. Prague Communiqué (2001); Leuven/Louvain-la-Neuve Communiqué (2009).

⁸ European University Association, *University Autonomy in Europe III: The Scorecard 2016*. Brussels, EUA, pp. 7-10.

However, in post-Soviet governance contexts, quality assurance mechanisms frequently assume a regulatory or supervisory character, which has significant implications for universities' capacity to make autonomous decisions¹⁰.

Against this background, the article pursues three interrelated objectives. The first is to analyze the constitutional and legislative frameworks governing academic freedom and institutional autonomy in the Baltic States and the South Caucasus, and to identify their principal similarities and differences. The second objective is to assess the practical implementation of these legal guarantees through governance models and quality assurance procedures, with particular attention to the role of national quality assurance agencies and their engagement in European networks such as ENQA and EQAR. The third objective is to evaluate the impact of Europeanization – as a process of normative and institutional convergence – on strengthening the protection of academic freedom and institutional autonomy.

By comparing two post-Soviet regions characterized by distinct integration pathways and governance outcomes, the article seeks to develop a deeper understanding of how legal norms, quality assurance models, and political context interact in shaping the actual conditions under which universities operate. In doing so, the study moves beyond formal declarations and aims to identify the structural factors that facilitate or constrain the transformation of academic freedom and institutional autonomy from constitutional principles into lived institutional practice.

2. Methodology and Analytical Framework

This study employs a qualitative comparative legal and policy analysis to examine the regulation and practical implementation of institutional autonomy and academic freedom in six post-Soviet countries: Estonia, Latvia, Lithuania, Georgia, Armenia, and Azerbaijan. The selection of these countries is based on their shared Soviet legacy and their divergent trajectories of higher education reform after independence. While the Baltic States have followed a path of early and consistent integration into the European Union and the European Higher Education Area, the South Caucasus countries demonstrate more heterogeneous patterns of legal development, governance reform, and Europeanization.

The analysis is based on three interrelated levels. First, the study examines the constitutional and legislative recognition of academic freedom and institutional autonomy, with particular attention to the hierarchical status of relevant legal guarantees. Second, it considers the practical implementation of these guarantees through university governance arrangements, the role of the state, and the degree of institutional discretion enjoyed by higher education institutions. Third, the article analyses the role of external quality assurance systems, including the extent to which national quality assurance agencies operate in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), and whether their procedures function primarily as developmental, supportive mechanisms or as instruments of regulatory control.

⁹ ENQA, ESU, EUA, EURASHE. *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, Brussels, 2015, pp. 19-21.

¹⁰ Bergan, S., *Academic Freedom and Institutional Autonomy*, Strasbourg, Council of Europe Publishing, 2020, pp. 21-25.

The analytical criteria applied in this study are summarized in Table 1. These criteria are used consistently throughout the country and regional comparisons in order to assess not only the formal legal recognition of academic freedom and institutional autonomy, but also their practical enforceability and institutional embeddedness.

Table 1 - Analytical criteria used for the comparative analysis

Analytical dimension	Main criterion	Relevance for the study	Main sources examined
Constitutional recognition	Whether academic freedom and/or institutional autonomy are explicitly protected at constitutional level	Determines the hierarchical strength and stability of legal protection	National constitutions; constitutional provisions on education, science, academic freedom and university autonomy
Sectoral legislative framework	Whether higher education laws define and operationalize institutional autonomy and academic freedom	Shows how constitutional or general guarantees are translated into concrete legal rights and institutional powers	Higher education laws; education laws; legal acts regulating HEIs
Scope of institutional autonomy	Organizational, academic, financial and staffing autonomy of higher education institutions	Assesses the practical capacity of universities to make independent institutional decisions	EUA autonomy reports; national legislation; higher education policy documents
Quality assurance mode	Whether external QA is based on selfevaluation, peer review, fitness for purpose and followup	Indicates whether QA supports autonomous institutional development or functions as administrative supervision	ESG 2015; ENQA/EQAR materials; national QA agency procedures
Role of QA agencies	Degree of agency independence and the nature of its intervention in programme/institutional evaluation	Helps evaluate whether QA agencies protect, balance or constrain institutional autonomy	QA agency methodologies; accreditation/authorization procedures; ENQA and EQAR references
Practical enforceability	Availability and effectiveness of mechanisms for protecting academic freedom and autonomy in practice	Distinguishes formal legal recognition from actual implementation	Judicial practice, policy literature, academic studies, comparative reports
Europeanization and integration	Degree of integration into EU/EHEA frameworks and European QA networks	Explains regional divergence between the Baltic States and the South Caucasus	EHEA documents; EUA reports; ENQA/EQAR membership and registration data

3. Legal and Conceptual Framework of Institutional Autonomy and Academic Freedom

3.1 Academic Freedom and Institutional Autonomy: International Definitions and the Post-Soviet Context

In contemporary higher education systems, academic freedom is regarded as a fundamental principle that guarantees the right of academic staff and students to engage freely in teaching, research, and the dissemination of knowledge without external political or ideological interference - a condition that was particularly problematic under the Soviet educational model, where academic activity was subject

to strict state control¹¹. Institutional autonomy, encompassing organizational, academic, financial, and staffing dimensions, has emerged as one of the central objectives of higher education reforms in post-Soviet countries, particularly following their engagement in the Bologna Process and the European Higher Education Area¹². UNESCO's Recommendation explicitly links academic freedom to institutional autonomy. According to UNESCO, institutional (academic) autonomy refers to the right of higher education institutions to determine their own academic policies, internal governance structures, and research priorities independently, without direct interference from the state. The document emphasizes that the effective protection of individual academic freedoms is not possible in the absence of a sufficient degree of institutional autonomy¹³.

In documents developed by the Council of Europe, academic freedom is regarded as an integral part of the human rights system and is closely linked to freedom of expression and the right to education. The Council emphasizes that academic freedom encompasses not only the freedom of teaching and research, but also the right of the academic community to participate in institutional governance processes. Institutional autonomy, in turn, is defined as the capacity of universities to make independent decisions in academic, organizational, financial, and staffing matters without excessive state regulation. This approach is particularly significant for countries with a historical legacy of centralized educational governance, such as post-Soviet states¹⁴.

Within the European Higher Education Area, academic freedom and institutional autonomy are recognized as core values in the policy documents of the European University Association (EUA). The EUA defines academic freedom as a prerequisite for ensuring the academic quality of universities and maintaining public trust, while institutional autonomy is understood as a fundamental condition that enables universities to manage their resources and strategic development responsibly¹⁵.

In the political declarations and communiqués adopted within the framework of the Bologna Process, academic freedom is not explicitly or systematically defined, however, it is implicitly embedded in concepts such as institutional responsibility, quality culture, and the role of universities in democratic society. Bologna Process documents conceptualize institutional autonomy as a necessary precondition for effective quality assurance and international competitiveness¹⁶.

In the post-Soviet context, these international definitions acquire particular significance, given that the Soviet education model was based on strict state control over academic activity and the practical absence of institutional autonomy. Consequently, the contemporary understanding of academic freedom and institutional autonomy in post-Soviet countries entails not only a legal transformation, but also a broader normative and cultural shift¹⁷.

¹¹ Altbach, P. G., *Academic Freedom in the Age of Globalization*, Rotterdam, Sense Publishers, 2001, pp. 205-220.

¹² Estermann, T., Nokkala, T., Steinel, M., *University Autonomy in Europe II*, Brussels: EUA, 2011, pp. 7-45

¹³ UNESCO, *Recommendation concerning the Status of Higher-Education Teaching Personnel*. Paris: UNESCO, 1997, pp. 17-18

¹⁴ Bergan, S., *Academic Freedom...*, cit., pp. 12-16

¹⁵ European University Association (EUA), *University Autonomy in Europe III: The Scorecard 2016*. Brussels, European University Association, 2016, pp. 5-7.

¹⁶ European Higher Education Area (EHEA), *Ministerial Communiqués of the Bologna Process (Prague 2001–Paris 2018)*, Brussels: EHEA Secretariat, pp. 2001-2018.

¹⁷ Altbach, P. G., *Academic Freedom in the Age...*, cit., pp. 206-208.

4. Institutional Autonomy and Academic Freedom in the Baltic States

4.1 Legal Framework of Academic Freedom and Institutional Autonomy

The Baltic States restored their independence from the Soviet Union in 1990 - 1991, after which they embarked on the establishment of new constitutional orders. The constitutions of Estonia and Lithuania were adopted in 1992, while Latvia reinstated its 1922 Constitution in 1993. In all three cases, the constitutions provide protection for academic freedom; in addition, the Lithuanian Constitution explicitly recognizes the institutional autonomy of universities. In Estonia and Latvia, institutional autonomy is derived from the constitutional protection of academic freedom and is subsequently specified in sectoral legislation¹⁸.

With regard to judicial practice in the protection of academic freedom and institutional autonomy, the volume of case law addressing these issues in the Baltic States remains limited. Most cases arise within the jurisdiction of constitutional courts and are relatively few in number; however, in Lithuania this jurisprudence has clear doctrinal significance, whereas in Estonia and Latvia judicial intervention has been more infrequent and indirect¹⁹. It may be argued that the limited volume of judicial practice concerning academic freedom and institutional autonomy should not be interpreted unambiguously. In the Baltic States, this situation may simultaneously indicate the presence of strong constitutional frameworks and high levels of institutional trust, as well as the underutilization of available legal protection mechanisms.

The accession of the Baltic States to the European Union in 2004 has had a significant impact on the practical enforcement of legislative regulations aimed at protecting academic freedom and institutional autonomy²⁰. Although European Union law does not directly regulate the content of higher education or the governance models of universities²¹, integration into the European Union has created a normative and institutional framework that has contributed to the strengthening of the rule of law, accountability, and institutional stability within the Member States²². Under these conditions, academic freedom and institutional autonomy have increasingly become legally enforceable principles in practice, rather than merely formally declared norms²³. Moreover, European Union membership has enabled the systematic participation of universities in European educational and research programmes, the effective utilization of which is closely linked in practice to autonomous institutional governance and minimum guarantees of academic independence²⁴.

Higher education reforms in the Baltic States are characterized by consistency and a clear European orientation, which is reflected in the broad academic and organizational autonomy of universities. In

¹⁸ Constitution of the Republic of Estonia (1992), art. 38; Constitution of the Republic of Lithuania (1992), art. 42; Constitution of the Republic of Latvia (Satversme) (1922/1993), art. 113. Karran, T., *Academic Freedom in Europe...*, cit., pp. 268-272. Bergan, S., *Academic Freedom and...*, cit., pp. 14-16.

¹⁹ Karran, T., *Academic Freedom in Europe...*, cit., pp. 268-273. Estermann, T., Nokkala, T., Steinel M., *University Autonomy ...*, cit., pp. 42-45. Bergan, S., *Academic Freedom and...*, cit., pp. 16-18.

²⁰ European Union, *Treaty of Accession 2003*, Official Journal of the European Union, L 236, 23 September 2003; entered into force 1 May 2004.

²¹ *Treaty on the Functioning of the European Union (TFEU)*. Art. 165, which reserves the content of education to the competence of Member States.

²² European Union, *Consolidated Version of the Treaty on European Union (TEU)*. Art. 2 (values of the Union: democracy, rule of law, respect for human rights).

²³ Bergan, S., *Academic Freedom and...*, cit., pp. 17-19.

²⁴ Estermann, T., Nokkala, T., Steinel, M., *University Autonomy ...*, cit., pp. 44-45.

Estonia, legislation grants universities the authority to independently determine the content of study programmes, research priorities, and criteria for the selection of academic staff, thereby reducing the scope for state intervention in practice²⁵.

The cases of Latvia and Lithuania demonstrate that institutional autonomy is reinforced through collegial governance structures and independent quality assurance agencies that operate in line with the ESG and do not engage in substantive control over programme content. In these countries, academic freedom has been consolidated not only as a legal norm but also as an institutional culture, which distinguishes them markedly from other regions of the post-Soviet space²⁶.

4.2 The Role of Quality Assurance Agencies in Safeguarding Academic Freedom and Institutional Autonomy

In the Baltic States, quality assurance agencies - Estonian Quality Agency for Education (HAKA), Academic Information Centre (AIKA), and Centre for Quality Assessment in Higher Education (SKVC) - play a supportive and balancing role in safeguarding institutional autonomy and academic freedom. An ESG-based evaluation model, the centrality of self-evaluation, and collegial peer review ensure that external quality assurance does not turn into substantive control over academic activity, but instead promotes the autonomous and responsible functioning of universities²⁷.

Comparative legal and institutional assessments suggest that the Baltic States display varying, but in several respects relatively developed, safeguards for academic freedom and institutional autonomy. In particular, Estonia demonstrates comparatively strong institutional-autonomy arrangements, while Latvia and Lithuania show differentiated levels of autonomy across organisational, financial, staffing and academic dimensions. These assessments examine legal and governance frameworks rather than academic staff members' individual awareness of, or perceptions regarding, the practical protection of these rights²⁸. In these countries, quality assurance systems primarily perform a developmental function and are less frequently used as instruments of administrative control, which is particularly important for the preservation of institutional autonomy²⁹.

In the Baltic States, the membership of quality assurance agencies in the European Association for Quality Assurance in Higher Education and their registration in the European Quality Assurance Register for Higher Education have had a significant, albeit indirect, impact on the protection of academic freedom and institutional autonomy. Frameworks based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area have strengthened the independence of agencies, limited

²⁵ Ivi, pp. 7-45.

²⁶ Bergan, S., *Academic Freedom and ...*, cit., pp. 12-25.

²⁷ ENQA, ESU, EUA, and EURASHE, *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015)*, Brussels, 2015, pp.19-20 (ESG 2.3), p. 27 (ESG 2.4-2.7). Estonian Quality Agency for Education (HAKA), *Institutional Accreditation Requirements and Procedure*, Tallinn, 2025, pp. 2-3 (Self-assessment/SER), 6 (Assessment visit), pp. 11-13 (Quality Assessment Council decision; publication; follow-up). Academic Information Centre / AIKA, *Methodology for the Assessment and Accreditation of Study Fields*, Riga, 2024, pp. 3-5 (SER requirement and responsibility), p. 11 (assessment visit meetings), pp. 16-17 (decision and publication). Centre for Quality Assessment in Higher Education (SKVC), *"External QA Framework", Key stages in the review process* (self-evaluation; site-visit; report; follow-up; complaints).

²⁸ Karran, T., "Academic Freedom in Europe: Time for a Magna Charta?," *"Higher Education Policy"* Vol. 22, no. 2, 2009, pp. 163-189, esp. 169-186; Estermann, T., Nokkala T., Steinel, M., *University Autonomy in Europe II: The Scorecard*. Brussels: European University Association, 2011, pp. 13-20, pp. 53-64.

²⁹ Harvey, L., Williams J. *Fifteen Years of Quality in Higher Education*, "Quality in Higher Education", Vol. 16, no. 1, 2010, pp. 80-85.

the scope of external quality assurance intervention, and fostered a collegial, self-evaluation-based assessment culture, thereby supporting the autonomous and responsible functioning of universities³⁰.

5. Institutional Autonomy and Academic Freedom in the South Caucasus Countries

5.1 Legal Framework of Academic Freedom and Institutional Autonomy

Among the South Caucasus countries, the constitutions of Armenia and Azerbaijan recognize the freedom of scientific and creative activity, which is generally regarded as a constitutional foundation for academic freedom. At the same time, in neither case is the institutional autonomy of higher education institutions explicitly defined at the constitutional level. By contrast, Georgia stands out within the South Caucasus for the simultaneous and explicit constitutional recognition of both academic freedom and the institutional autonomy of higher education institutions³¹.

Studies conducted by the European University Association (EUA) reflect varying degrees of institutional autonomy and academic freedom across the South Caucasus countries. Georgia is characterized as a transitional system in which the legal foundations of autonomy are gradually being translated into practical mechanisms, whereas in Armenia - and particularly in Azerbaijan - higher education governance remains highly centralized and the exercise of institutional autonomy is significantly constrained³².

5.2 The Role of Quality Assurance Agencies in Ensuring Academic Freedom and Institutional Autonomy

In the South Caucasus countries - Georgia, Armenia, and Azerbaijan - quality assurance agencies perform a dual role in the process of safeguarding academic freedom and institutional autonomy³³. On the one hand, they ensure the formal implementation of European quality standards (ESG), including the mandatory use of self-evaluation reports, the conduct of collegial peer reviews, and the public availability of evaluation reports³⁴. This contributes to the normative legitimization of university autonomy. On the other hand, within national governance contexts, their activities frequently assume a regulatory and control-oriented character, manifested in the imposition of detailed requirements on the substantive elements of study programmes³⁵.

In this context, external quality assurance agencies perform a dual function: on the one hand, they contribute to the enhancement of quality and accountability; on the other hand, their highly detailed

³⁰ ENQA, ESU, EUA, and EURASHE, *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015)* (Brussels: ENQA, 2015), pp. 19-20. (ESG 2.3: independence and processes), p. 27 (ESG 2.4-2.7: self-evaluation, peer review, publication, follow-up).

³¹ Constitution of the Republic of Armenia (1995, as amended), arts. on freedom of scientific and creative activity; Constitution of the Republic of Azerbaijan (1995), arts. on freedom of scientific and creative activity; Constitution of Georgia (1995, as amended in 2018), art. 16(1) ("Academic freedom and the autonomy of higher education institutions are guaranteed").

³² EUA, *University Autonomy in Europe III: The Scorecard 2016*; Estermann, T., Nokkala, T., Steinel, M., *University Autonomy in Europe II*, EUA, 2011, pp. 42-46.

³³ *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, Brussels, 2015, pp.19-21.

³⁴ Ibid. (Standards 2.3-2.7, incl. self-assessment, site visit, reporting, publication, complaints/appeals).

³⁵ Law of the Republic of Azerbaijan on Education (Baku: 2009, as consolidated translation), 14 (Art. 16.3: accreditation includes "educational programs" and compliance with national standards and other normative-legal requirements).

standards are at times perceived as constraining institutional autonomy³⁶. This dilemma is particularly evident in Georgia, where the alignment of the quality assurance system with European standards has simultaneously generated debates regarding the scope and limits of institutional freedom³⁷.

Membership of quality assurance agencies in the South Caucasus countries in European Association for Quality Assurance in Higher Education has had a significant, though indirect, impact on the protection of academic freedom and institutional autonomy. Frameworks based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area have contributed to the de-interventionization of quality assurance processes and strengthened the professional independence of agencies. At the same time, within national governance contexts, ENQA's influence remains structurally limited and cannot substitute for the direct legal protection of academic freedom and institutional autonomy.

6. Legal Guarantees and Practical Implementation of Academic Freedom and Institutional Autonomy: Evidence from the Baltic States and the South Caucasus

6.1 Legal Guarantees: A Comparative Analysis of Constitutional and Legislative Frameworks

In the Baltic States - Estonia, Latvia, and Lithuania - academic freedom and the institutional autonomy of higher education institutions are regarded as fundamental constitutional principles, granting universities a strong legal status as academically independent institutions vis-à-vis the state. The Lithuanian Constitution explicitly recognizes university autonomy, while in Estonia and Latvia academic freedom and educational self-governance form an integral part of constitutional doctrine and are subsequently specified in sectoral legislation³⁸.

In the South Caucasus, the legal landscape is more heterogeneous. Georgia is distinctive in that its constitution explicitly guarantees both academic freedom and the autonomy of higher education institutions, thereby conferring upon these principles the status of fundamental constitutional guarantees³⁹. By contrast, the constitutions of Armenia and Azerbaijan recognize academic freedom only indirectly - through the freedom of scientific and creative activity - while the institutional autonomy of universities is not defined at the constitutional level and is regulated solely through sectoral legislation⁴⁰.

The comparative analysis demonstrates that in the Baltic States academic freedom and institutional autonomy are more clearly entrenched at the constitutional level, whereas in the South Caucasus legal guarantees are often fragmented and dependent on norms established by the executive branch, creating legal uncertainty with regard to their practical realization⁴¹.

³⁶ Harvey, L., Williams, J., *Fifteen Years of Quality...*, cit.

³⁷ Chankseliani, M., *Higher Education Reform in the Post-Soviet Space*, London, Routledge, 2013, pp. 85-100.

³⁸ Constitution of the Republic of Lithuania; Constitution of the Republic of Estonia; Constitution of the Republic of Latvia.

³⁹ Constitution of Georgia, art. 16(1).

⁴⁰ Constitution of the Republic of Armenia (1995); Constitution of the Republic of Azerbaijan (1995).

⁴¹ Karran, T., *Academic Freedom in Europe...*, cit., pp. 268-272.

6.2 Practical Implementation: Quality Assurance, Governance, and Institutional Practice

Differences in legal frameworks are clearly reflected in the practical implementation of academic freedom and institutional autonomy. In the Baltic States, quality assurance agencies operating on the basis of the Standards and Guidelines for Quality Assurance in the European Higher Education Area and holding membership in the European Association for Quality Assurance in Higher Education, as well as registration in the European Quality Assurance Register for Higher Education, primarily perform a balancing and supportive function. Within evaluation processes, emphasis is placed on internal quality assurance systems, institutional capacity, and the principle of fitness for purpose, which limits external interference in the substantive content of academic activities and strengthens the accountable autonomy of universities⁴².

In the South Caucasus countries, quality assurance agencies also formally rely on ESG principles and are engaged in European networks; however, in practice their activities frequently assume a regulatory and control-oriented character. Evaluation processes are more closely linked to administrative decisions (such as authorization, accreditation, and sanctions), and programme assessments often involve detailed requirements concerning substantive content, thereby narrowing the practical space for the exercise of academic freedom⁴³.

Differences are also evident at the level of institutional governance. In the Baltic States, universities enjoy broad discretion in the formation of governing bodies, the determination of academic structures, and the setting of strategic priorities, whereas in the South Caucasus the role of the state in university governance remains strong and often constrains the effective scope of institutional self-governance⁴⁴.

As a result, although academic freedom and institutional autonomy are formally declared in the South Caucasus countries, their practical implementation lags significantly behind the Baltic model, where constitutional guarantees, a supportive logic of quality assurance, and an institutional environment strengthened through European Union integration provide a more sustainable foundation for the realization of these principles⁴⁵.

The main comparative findings of the analysis are summarized in Table 2. The table does not replace the country-level discussion presented above, but synthesizes the principal regional patterns concerning legal guarantees, quality assurance, governance, and practical implementation.

⁴² ENQA, ESU, EUA, EURASHE, *Standards and Guidelines for...*, cit., pp. 19-21, p.27.

⁴³ Bergan, S., *Academic Freedom and ...*, cit.

⁴⁴ Estermann, T., Nokkala, T., Steinel, M., *University Autonomy...*, cit., pp. 42-46.

⁴⁵ European University Association, *University Autonomy in Europe III*, The Scorecard, 2016.

Table 2 - Comparative Findings on Legal Guarantees, Quality Assurance, Governance and Practical Implementation

Analytical dimension	Baltic States	South Caucasus
Constitutional and legal recognition	Academic freedom is constitutionally protected in all three Baltic States, while university autonomy is explicitly recognized in Lithuania and further developed through sectoral legislation in Estonia and Latvia.	The legal picture is more heterogeneous. Georgia explicitly guarantees both academic freedom and institutional autonomy at constitutional level, while Armenia and Azerbaijan recognize academic freedom mainly indirectly through scientific and creative freedom, and institutional autonomy is primarily regulated by sectoral legislation.
Hierarchical strength of legal guarantees	Legal guarantees are comparatively stronger and more stable due to constitutional recognition, EU membership, and the consolidation of rule-of-law institutions.	Legal guarantees are more fragmented and, in some cases, dependent on ordinary legislation or administrative regulation, which may weaken their practical stability
University governance and institutional discretion	Universities generally enjoy broader discretion in academic, organizational, staffing, and strategic matters, supported by governance cultures based on institutional trust and accountability.	State influence over university governance remains stronger, and institutional discretion is more frequently limited by centralized governance traditions and administrative regulation
Quality assurance model	External quality assurance is mainly developmental and supportive, emphasizing self-evaluation, peer review, fitness for purpose, follow-up, and institutional responsibility.	Quality assurance formally relies on ESG principles, but in practice it more often performs a regulatory or control-oriented function, especially where evaluation is closely linked to authorization, accreditation, sanctions, or detailed programme requirements
Role of QA agencies	QA agencies generally act as balancing mechanisms that support accountable autonomy and limit excessive external interference in academic matters.	QA agencies play a dual role: they promote European standards and accountability, but may also narrow institutional autonomy when procedures become overly prescriptive or supervisory.
Europeanization and integration	EU membership, participation in EHEA reforms, and integration into ENQA/EQAR frameworks have reinforced institutional stability and quality assurance cultures.	QA agencies play a dual role: they promote European standards and accountability, but may also narrow institutional autonomy when procedures become overly prescriptive or supervisory.
Practical implementation	Academic freedom and institutional autonomy are more likely to function as enforceable and institutionally embedded principles.	Formal recognition does not always translate into effective implementation; practical protection depends heavily on governance culture, legal enforcement, and institutional capacity.
Overall pattern	The Baltic model reflects a stronger alignment between legal guarantees, institutional governance, and developmental quality assurance.	The South Caucasus model reflects a greater gap between formal legal recognition and practical realization, although Georgia demonstrates closer approximation to the European model than Armenia and Azerbaijan.

Table 2 shows that the main distinction between the two regions does not lie only in the existence or absence of formal legal guarantees. Rather, the decisive difference concerns the extent to which these guarantees are supported by institutional practice, quality assurance culture, governance arrangements, and broader European integration. In this respect, the Baltic States demonstrate a higher degree of alignment between law and practice, whereas the South Caucasus countries reveal a more fragmented and uneven pattern of implementation.

7. Conclusion

This study has demonstrated that academic freedom and institutional autonomy in post-Soviet countries constitute not merely legal categories, but processes of normative and institutional transformation, the quality and depth of which differ significantly between the Baltic States and the South Caucasus. The comparative analysis has shown that these two regions follow distinct trajectories with regard to both the legal definition of academic freedom and institutional autonomy and their practical implementation.

In the Baltic States, academic freedom and the institutional autonomy of universities are firmly entrenched at the constitutional level and further elaborated in sectoral legislation, creating a strong and stable legal framework. The practical effectiveness of this framework is closely linked to European Union integration, European models of quality assurance, and a governance culture based on institutional trust. As a result, academic freedom in these countries functions not merely as a formally declared right, but as a principle that is effectively implemented and institutionally protected in practice.

In the South Caucasus, by contrast, the study reveals a more heterogeneous and internally contradictory picture. Although academic freedom and institutional autonomy are formally recognized at the constitutional and legislative levels, their practical realization remains highly dependent on national governance models, administrative regulation, and the historically embedded legacy of centralized control. In this context, Georgia represents a particularly noteworthy case: while its legal guarantees are closer to the European model, significant challenges persist in the effective implementation of institutional autonomy.

The analysis further demonstrates that quality assurance agencies play an important, yet differentiated, role across the two regions. In the Baltic States, these agencies largely function as supportive and balancing mechanisms that reinforce academic freedom and institutional autonomy. In the South Caucasus, however, quality assurance practices more frequently assume a regulatory and control-oriented character. Despite formal reliance on European standards and participation in European networks, quality assurance systems in the South Caucasus have not fully moved beyond the logic of administrative oversight, thereby constraining the practical space for academic freedom.

Overall, the findings confirm that the effective protection of academic freedom and institutional autonomy in post-Soviet countries depends not only on formal legal declarations, but on a broader institutional environment encompassing governance models, quality assurance culture, judicial protection mechanisms, and the degree of European integration. The experience of the Baltic States illustrates how the alignment of these elements can create a sustainable foundation for the realization of academic freedom, whereas in the South Caucasus the strengthening of this process remains a significant and ongoing challenge.

Finally, this study highlights the need for further research that examines the practical implementation of academic freedom and institutional autonomy at the institutional level, including the perceptions of the academic community and the development of judicial practice. Future research could also benefit from a more systematic engagement with theoretical frameworks from public policy, governance

studies, and regulatory theory. Such approaches would make it possible to examine more closely the interaction between higher education institutions, quality assurance agencies, ministries, and other regulatory actors, and to assess how legal guarantees are mediated by policy instruments, administrative practices, accountability mechanisms, and institutional power relations. This would contribute not only to the advancement of theoretical understanding, but also to the improvement of policy-making and quality assurance systems within the post-Soviet higher education space.

Future research could further deepen this analysis by engaging more systematically with theoretical frameworks from public policy, governance studies, and regulatory theory. Such approaches would make it possible to examine more closely the interaction between higher education institutions, quality assurance agencies, ministries, and other regulatory actors. In particular, future studies could explore how formal legal guarantees of academic freedom and institutional autonomy are mediated by policy instruments, administrative practices, accountability mechanisms, and institutional power relations. This would contribute to a more nuanced understanding of the conditions under which legal guarantees are transformed into effective institutional practice.

Bibliography

Academic Information Centre (AIKA), *Methodology for the Assessment and Accreditation of Study Fields*. Riga, 2024, (Self-evaluation report requirements and institutional responsibility), (assessment visit meetings), (decision-making and publication). <https://www.aika.lv/en/methodology> [last accessed 14 February 2026].

Academic Freedom Index, Global Public Policy Institute (GPPi) and Friedrich-Alexander-Universität Erlangen-Nürnberg (FAU). Latest available edition at: <https://academic-freedom-index.net/> [last accessed 14 February 2026].

Altbach, P. G., Reisberg, L., Rumbley, L. E., *Trends in Global Higher Education: Tracking an Academic Revolution*. Rotterdam: Sense Publishers, 2009. <https://doi.org/10.1007/978-94-6091-013-1> [last accessed 13 February 2026].

Bergan, S., *Academic Freedom and Institutional Autonomy*. Strasbourg: Council of Europe Publishing, 2020. <https://www.coe.int/en/web/higher-education-and-research/academic-freedom> [last accessed 13 February 2026].

Centre for Quality Assessment in Higher Education (SKVC), *External Quality Assurance Framework*, Vilnius, latest version, key stages of the review process (self-evaluation, site visit, external report, follow-up procedures, complaints). <https://www.skvc.lt/en/activities/quality-assurance> [last accessed 14 February 2026].

Constitution of Georgia. 1995 (as amended, 2018), <https://www.matsne.gov.ge/en/document/view/30346> [last accessed 14 February 2026].

Constitution of the Republic of Armenia, 1995. <https://www.president.am/en/constitution-2015> [last accessed 14 February 2026].

Constitution of the Republic of Azerbaijan, 1995. <https://president.az/en/pages/view/azerbaijan/constitution> [last accessed 14 February 2026].

Constitution of the Republic of Estonia, 1992. <https://www.riigiteataja.ee/en/eli/ee/Riigikogu/act/521052015001/consolide> [last accessed 14 February 2026].

Constitution of the Republic of Latvia, 1922 (reinstated 1993). <https://www.saeima.lv/en/legislation/constitution> [last accessed 14 February 2026].

Constitution of the Republic of Lithuania, 1992. <https://www.lrs.lt/home/Konstitucija/Constitution.htm> [last accessed 14 February 2026].

Chankseliani, M., *Soviet Legacies in Higher Education Governance*, "Comparative Education Review" Vol. 57, no. 3, 2013. <https://www.journals.uchicago.edu/doi/10.1086/670662> [last accessed 13 February 2026].

Council of Europe, *Academic Freedom and Institutional Autonomy*. Strasbourg: Council of Europe Publishing, 2020. <https://www.coe.int/en/web/higher-education-and-research/academic-freedom> [last accessed 13 February 2026].

EHEA Ministerial Conference, *Prague Communiqué: Towards the European Higher Education Area*, Prague, 2001.

EHEA Ministerial Conference, *Leuven/Louvain-la-Neuve Communiqué: The Bologna Process 2020 – The European Higher Education Area in the New Decade*, Leuven, 2009. <https://www.ehea.info/page-ministerial-conference-leuven-louvain-la-neuve-2009> [last accessed 13 February 2026].

ENQA, ESU, EUA, EURASHE. *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Brussels, 2015. <https://www.enqa.eu/publications/esg-2015/> [last accessed 13 February 2026].

Estermann, T, Nokkala T., Steinel, M., *University Autonomy in Europe II: The Scorecard*. Brussels: European University Association, 2011. <https://www.eua.eu/resources/publications/347:university-autonomy-in-europe-ii-the-scorecard.html>

Estonian Quality Agency for Education (HAKA), *Institutional Accreditation Requirements and Procedure*. Tallinn, 2025, (Self-assessment/SER), (Assessment visit), (Quality Assessment Council decision, publication, follow-up). <https://harno.ee/en/quality-assurance/institutional-accreditation> [last accessed 14 February 2026].

European University Association (EUA). *University Autonomy in Europe III: The Scorecard 2016*. Brussels: EUA, 2016. <https://www.eua.eu/resources/publications/418:university-autonomy-in-europe-iii-the-scorecard-2016.html> [last accessed 14 February 2026].

European Union. *Treaty of Accession 2003. Official Journal of the European Union L 236*, 23 September 2003; entered into force 1 May 2004. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12003T/TXT> [last accessed 14 February 2026].

European Union. *Treaty on the Functioning of the European Union (TFEU)*, art. 165. <https://eur-lex.europa.eu/legal-content> [last accessed 14 February 2026].

European Union. *Consolidated Version of the Treaty on European Union (TEU)*, art. 2. <https://eur-lex.europa.eu/legal-content> [last accessed 14 February 2026].

Harvey, L., Williams, J., *Fifteen Years of Quality in Higher Education*, "Quality in Higher Education" Vol. 16, no. 1, 2010. <https://doi.org/10.1080/13538321003679457> [last accessed 13 February 2026].

Hazelkorn, E., *Rankings and the Reshaping of Higher Education: The Battle for World-Class Excellence*. London, Palgrave Macmillan, 2015. <https://link.springer.com/book/10.1057/9781137446671>.

Karran, T., *Academic Freedom in Europe: A Preliminary Comparative Analysis*, "Higher Education Policy" Vol. 22, no. 3, 2009. <https://link.springer.com/article/10.1057/hep.2009.1> [last accessed 14 February 2026].

Quality in Higher Education, "Quality in Higher Education" Vol. 16, no. 1, 2010. <https://doi.org/10.1080/13538321003679457> [last accessed 13 February 2026].

UNESCO, *Higher Education in the Former Soviet Union: Problems and Prospects*. Paris: UNESCO Publishing, 2003. <https://unesdoc.unesco.org/ark:/48223/pf0000130022> [last accessed 14 February 2026].

UNESCO, *Recommendation concerning the Status of Higher-Education Teaching Personnel*. Paris: UNESCO, 1997. <https://unesdoc.unesco.org/ark:/48223/pf0000110383> [last accessed 14 February 2026].

Mobility, Internationalisation and Recognition of Qualifications in the European Union: The Birth of the NARIC Network

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| Abstract

Until the Maastricht Treaty, the European Union had no formal jurisdiction over education. However, education, along with mobility and language learning, has always been seen as one of the levers for the process of European integration. This political vision, which underpinned the launch of the Erasmus programme in the 1980s, also made use of the role of qualification recognition, seen as a tool for ensuring the success of academic mobility and free movement. This article traces the evolution of this process between the 1970s and the 1990s focusing on European Union. The text traces the political motivations that, starting in the 1970s, led in the following decade to the creation and development of the network of National Academic Recognition Information Centres on the initiative of the European Commission.

Keywords: European Union, Recognition of Qualifications, NARIC, ERASMUS, Internationalisation, Mobility.

1. Introduction

Until the Maastricht Treaty in 1992, the European Union had no legal competence in the field of education. However, in the 1980s, it promoted the creation of a network of centres supporting academic recognition, called National Academic Recognition Information Centres (NARIC). Why was NARIC centres created? What was their mission and purpose in the European vision? Why the recognition agenda was felt as strategic for Europe? This article attempts to outline some answers to these questions by analysing the cultural and social context of the time and the political debate in the European Community in which the NARIC network was developed.

From a methodological perspective, the historical research has drawn on bibliographic analysis, EU documentation, regulatory analysis at national and international level, and on the CIMEA archive. CIMEA has a paper-based documentation centre comprising one section on the NARIC centre (15 folders), that ranges from 1984 to the mid-2000s. The documentation centre forms part of CIMEA's information resources – now largely in digital form – and serves as its historical archive. Within the folders, the documentation is mostly organised into files. The documents come in various formats, ranging from printed material to typewritten and handwritten documents. The centre contains a wide variety of material: diaries, minutes, correspondence (emails, letters, faxes), publications, personal notes, practical guides, questionnaires, programmes, reports, information notes, pamphlets and other documents. The originality of this article lies in the data accessible in the CIMEA archive, that provides information on the rationale, the debate, and the insights not always evident from the administrative and regulatory documents. The second element of originality is to shed light albeit on a limited period – on the recognition of qualifications and on institutions managing it in the European context. Despite the topic being a recurrent one in policy documents of the European Community and of the European Union, it has been less explored compared to other topics related to the domain of higher education in Europe. Despite this, it is an example of the tensions behind the action of European institutions in the domain of education (supranational vs. national, institutional vs. system level, soft vs. hard power). This article focuses on recognition of higher education qualifications in the European Union context between 1970s and the 1990s¹.

2. Setting the Scene: Higher Education, Internationalisation and Mobility in Europe in the Second Half of the 20th Century

The legacy of the Second World War strengthened the rationale for the further development of the higher education sector. First, this was driven by the need to reconstruct European societies, cultures and economies after the destruction caused by the war. Secondly, there was a growing recognition of the importance of research, innovation and workforce training for economic reconstruction. Closely linked to this was increasing support for the role of the welfare state and taxation in reducing inequalities in access to higher education. Thirdly, the geopolitical context also acted as a major driver, with the Cold War and postcolonial dynamics affecting higher education, as well as many other sectors².

The second half of 20th century Higher Education in Europe was characterised by a number of lines of transformation. The first was the transformation of universities: from a space mainly accessed by a restricted élite they became a player in the massification of higher education: in 2000, the gross enrolment ratio³ on a global scale was 19%, in Europe it was 43.01% for Central and Eastern Europe,

¹ From the terminological point of view, the definition of recognition adopted in this text is that contained in the 1997 Lisbon Convention on the Recognition of Qualifications, which defines the term as «the formal recognition by a competent authority of the value of a foreign qualification for the purpose of access to training and/or employment». A higher education qualification, again according to the Lisbon Recognition Convention, is both a qualification awarded after successful completion of a higher education programme, but also a qualification giving access to higher education. Council of Europe, UNESCO, *Convention on the Recognition of Qualifications concerning Higher Education in the European Region*, "European Treaty Series", no. 165, Lisbon, 11 April 1997, <https://rm.coe.int/168007f2c7> [last accessed 15 June 2026].

² Carpentier, V., *History of Higher Education in Modern Europe*, in Rury, J. L., Tamura E.H (eds.) *The Oxford Handbook of The History of Education*, Oxford, University Press, Oxford, 2019, pp. 257-274.

³ The gross enrolment ratio is defined as the total enrolment in tertiary education regardless of age expressed as a percentage of the population in the 5-year age group immediately following upper secondary education (between 18-14 years of age).

50.91% for the European Union, and 60.93% for North America and Western Europe⁴. Today the ratio is 43% on a global scale, 79% in Europe and North America⁵. In absolute terms, the number of students enrolled in higher education has moved from around 500.000 at the beginning of the 20th century to the approximately 100 millions in 2000⁶. Looking at the number of higher education institutions, currently there are approximately 21.500 worldwide⁷.

The second trend was the increase and diversification of higher education institutions. In the late 1950s and early 1960s the economic growth and the expansion of students led to the perspective that stronger diversification of Higher Education was desirable, for 2 main reasons: to reduce "economic" pressure on research universities, as it would have been too expensive to support; and to provide more professional and diversified training to a part of this increasing number of students. Secondly, the heterogeneity of offer would have been fitted the diversity of background, expectations and perspectives of the enlarged demand of students⁸. During the 1960s and 1970s, several countries adopted a binary model of higher education, marked by the establishment of polytechnics in the United Kingdom⁹, the Institutes Universitaires de Technologie in France¹⁰ and the Fachhochschulen in Germany¹¹. This diversity was also reinforced in the 1990s with the reforms of higher education systems and the emergence of diverse providers in Eastern Europe after the fall of the Berlin Wall. Another element of increasing diversification was the growth of private providers and the increase in transnational education provision, also following the establishment of the General Agreement on Trade in Services (GATS) in 1995 by the World Trade Organisation (WTO). The agreement aimed to create a credible and reliable system of international trade rules for twelve commercial sectors, one of which was education. GATS gave further impetus to the diversification of higher education, also encouraging the spread of so-called transnational education phenomena¹².

From the same years, digitalisation brought another layer of differentiation, with the birth of the web in 1991, the growth of distance learning and online education, and the development of new technologies, including the latest trend in the diffusion of short learning courses and micro-credentials¹³. A third line of transformation was the progressive internationalisation of higher education and the rise in student

⁴ UNESCO UIS, *Gross enrolment ratio for tertiary education, both sexes (%) [Data set]*, 2026. <https://databrowser.uis.unesco.org/>

⁵ UNESCO, *Higher education: Figures at a glance*, 2025. <https://unesdoc.unesco.org/ark:/48223/pf0000394112>. [last accessed 15 June 2026].

⁶ Guri-Rosenblit, S., Sebkova, H., Teichler, U., *Massification and Diversity of Higher Education Systems: Interplay of Complex Dimensions*, UNESCO, Paris, 14 February 2007. <https://unesdoc.unesco.org/ark:/48223/pf0000157816> [last accessed 15 June 2026].

⁷ International Association of Universities (IAU), UNESCO, *What is WHED?*, 2026. <https://whed.net/About.html> [last accessed 15 June 2026].

⁸ Guri-Rosenblit, S., Sebkova, H., Teichler, U., *Massification and Diversity of Higher Education Systems...*, cit.

⁹ Brosan, G. S., *The Development of Polytechnics in the United Kingdom. In Diversifying Post-Secondary Education in Europe / La Diversification dans l'Enseignement Post-Secondaire en Europe / Der Ausbau des tertiären Bildungswesens in Europa*, "Paedagogica Europaea" Vol. 7, 1972, pp. 41-53. <https://doi.org/https://doi.org/10.2307/1502485>. Lewis, M. S., *The Polytechnics: A Peculiarly British Phenomenon*, "Regional Development II", Vol. 2, no. 4, 1991, pp. 24-34. <https://journals.indianapolis.iu.edu/index.php/muj/article/view/19224>. [last accessed 15 June 2026].

¹⁰ Tralongo, S., *Les instituts universitaires de technologie: Des spécificités originelles aux transformations récentes*, "Diversité", Vol. 1, no. 202, 2023, pp. 201-213. <http://journals.openedition.org/diversite/3871> [last accessed 15 June 2026].

¹¹ Higher Education Compass, *History of the the universities of applied sciences*, 2026. <https://www.hochschulkompass.de/en/higher-education-institutions/history/history-of-the-universities-of-applied-sciences.html> [last accessed 15 June 2026].

¹² Definition of Transnational Education: «A subset of cross-border education where study programmes, or sets of courses, or educational services borrow or transfer elements of one country's higher education system (or non-country specific education systems) from or to another country». UNESCO, *Code of Good Practice in the Provision of Transnational Education*, Paris, 2025. <https://rm.coe.int/code-of-good-practice-in-tne-adopted-on-22-october-2025/4880291d8e> [last accessed 15 June 2025].

¹³ Altbach, P. G., *The necessity and reality of differentiated postsecondary ecosystem*, in Altbach P. G., Reisberg, L., de Wit, H., (eds), *Responding to massification: Differentiation in postsecondary education worldwide*, SensePublishers Rotterdam, 2017, pp. 1-12.

and academic mobility. The global number of internationally mobile students more than tripled over the last two decades, rising from 2.1 million in 2000 to nearly 6.9 million in 2022¹⁴.

Student mobility grew due to a complex set of factors, including phenomena linked to decolonisation, but also specific ideological and political motivations, including those linked to the Cold War context. As an example, in 1960 the Soviet Union created a university in Moscow for students from what was then known as the Third World¹⁵. In parallel with mobility from the Global South to the Global North, there was also intra-regional mobility in Europe, with the fall of the *Iron Curtain*¹⁶ and mobility and migration flows between East and West. The processes of internationalisation in higher education took place at various levels, with a mix of push-pull factors: at the international level, with increased cooperation thanks to the activities of international organisations, intergovernmental agreements and bilateral agreements; at the national level, for example through funding for internationalisation and attraction projects; and at the institutional level, for example through inter-university agreements, associations and networks, and joint degrees. Taking the case of Italy, a significant date is 1980, when universities were authorised by law to enter into inter-institutional agreements, a form of cooperation that had not been permitted until then. These were the years when universities became more aware of the issue of internationalisation, the first international relations offices were set up, and university delegates were appointed to deal with the issue. This strategic direction was consolidated over the years, until internationalisation became a structural dimension of the university.

These trends brought with them issues such as the need for information and transparency on higher education systems, institutions and programmes; the role of the recognition of qualifications in supporting mobility, as well as employability, competitiveness and internationalisation; and quality assurance and shared quality frameworks, to ensure acceptable standards across very diverse institutions. In parallel with the increase in demand for higher education, fake institutions, or so-called diploma mills, also became more widespread and visible. Alongside these trends, there was a policy push at the European level towards increased comparability and transparency of higher education systems. From the European Union perspective, interest in higher education policies was based, on the one hand, on an awareness of their role in the development of an open European labour market, and, on the other, on the idea that cooperation at the higher education level could be a driver for the development of a European identity. These actions came under the heading of the Europeanisation of higher education, within a complex interplay of different actors¹⁷. Geopolitical changes, with conflicts linked to the break-up of Yugoslavia, also led to an emphasis on the need to support the recognition of refugees' qualifications, even in the absence of educational documentation¹⁸. Many of these elements lay the foundations and shaped the development of recognition policies and practices in Europe.

¹⁴ UNESCO, *Higher education...*, cit.

¹⁵ Cf., Berhe, S., *Studenti internazionali nell'Italia repubblicana, Storia di un'avanguardia*, Mimesis, 2023.

¹⁶ «Iron Curtain, the political, military, and ideological barrier erected by the Soviet Union after World War II to seal off itself and its dependent eastern and central European allies from open contact with the West and other noncommunist areas». Britannica Editors., *Iron Curtain*, "Encyclopedia Britannica", 20 April 2026. <https://www.britannica.com/event/Iron-Curtain>. Accessed 8 July 2026. [last accessed 15 June 2026].

¹⁷ Berg, C., Vlăsceanu, L., *The Europeanization of Higher Education: Integration and diversity as viewed from eastern Europe*, "Higher Education in Europe", Vol. 16, no. 4, pp. 4-18. 1991. Maassen, P., Musselin, C., *European Integration and the Europeanisation of Higher Education*, in Amaral, A., Neave, G., Musselin, C. et al., (eds), *European Integration and the Governance of Higher Education and Research*, Springer, 2009, pp- 3-17.

¹⁸ On the impact of changes in Eastern Europe on higher education, see also the extensive dossier Univeristas, *La svolta dell'Est*, (The turning point in the East), "Universitas", Vol.36, XI, no. 2, 1986, Fratelli Palombi Editori, pp. 3-38. The dossier also contains data on inter-university agreements between Italy and Eastern European countries, which numbered 112 and involved seven countries (Poland, USSR, Hungary, Yugoslavia, East Germany, Czechoslovakia, Bulgaria).

3. Recognition of Qualifications in the European Community

In the years immediately following the Second World War, academic mobility was seen as one of the tools for dialogue and cooperation between countries, with the aim of building societies capable of living in peace and avoiding the tragedy of war again. This approach characterises the so-called first generation of conventions on the recognition of qualifications, under the aegis of UNESCO and the Council of Europe (CoE), and more generally cultural and cooperation agreements covering also education and higher education, such as the 1952 Italy-Austria Cultural Agreement¹⁹.

In parallel with the framework at pan-European level as designed by the CoE and UNESCO conventions on recognition, since the 1970s there has been discussion within the European Community on the construction of a Europe of citizens. For the European Community, the issue of recognition of qualifications was seen as one of the tools for implementing the founding treaties and ensuring the free movement of individuals. From the European Commission's perspective, in the years immediately following the Second World War, the Council of Europe was seen as the most appropriate forum for educational issues²⁰. It was then at the end of the 1960s, as will be seen below, that discussions began on a stronger commitment by the European Community.

3.1 The Treaty of Rome

The idea of the free movement of citizens is rooted in the Treaty of Rome, mainly considered from the perspective of professional recognition. The preamble to the 1957 Treaty of Rome establishing the European Economic Community emphasises the determination of the countries to «lay the foundations of an ever-closer union among the peoples of Europe» and their commitment to «ensure, through common action, the economic and social progress of their countries by removing the barriers that divide Europe».

In Article 3, concerning the elimination of obstacles to the free movement of persons, services and capital between Member States, one of the main actions of the Community was «the elimination of obstacles to the free movement of persons between Member States» (paragraph c). Article 49, on the free movement of workers, provides for the elimination, «in accordance with a progressive plan, of those administrative procedures and practices [...] whose maintenance would be an obstacle to the liberalisation of the movement of workers». Freedom of establishment and the possibility for a professional to work in another country of the Community were provided for in the Treaty of Rome, in Article 57, which states: «In order to facilitate access to and the exercise of activities other than salaried activities, the Council, acting unanimously during the first stage and by a qualified majority thereafter, shall, on a proposal from the Commission and after consulting the Assembly, issue directives for the mutual recognition of diplomas, certificates and other qualifications»²¹. Article 128 (on vocational training)

¹⁹ Cf., Lantero, L., Finocchietti, C. (eds), *Accordo Italia-Austria sul riconoscimento automatico dei titoli di studio. Storia, attuazione, impatto sociale*. Laterza, 2023.

²⁰ European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation in education and training, Europe in the making: An example*, Publications Office of the European Union, 2006, pp. 43-59.

²¹ «In order to facilitate access to and the pursuit of activities not as an employed person, the Council, on a proposal from the Commission and after consulting the Assembly, shall, acting unanimously in the first stage and by a qualified majority thereafter, adopt directives for the mutual recognition of diplomas, certificates and other qualifications». European Parliament, *Treaty of Rome: Treaty establishing the European Economic Community*, Article 57, paragraph 1, 25 March 1957, <https://www.europarl.europa.eu/about-parliament/en/in-the-past/the-parliament-and-the-treaties/treaty-of-rome>. [last accessed 15 June 2026].

would also be used as a reference for recognition, stating that the European Council «shall lay down the general principles for implementing a common vocational training policy which can contribute to the harmonious development of both the national economies and the common market»²².

3.2 European Citizens' Initiative and Cooperation in Education: Developments Since the 1970s

The debate on extending cooperation to the academic sphere in the countries of the European Community began in 1969, when there were calls for the area of education to be taken into account as a necessary addition to Community action in economic and social matters and, in particular, as requested by the European Parliament in October 1969, for the Europeanisation of universities as the foundation for a genuine cultural Community²³.

However, initially there was no consensus on what form this cooperation should take. It was in November 1971 that this cooperation began to take shape with the first meeting of the ministers of education. In 1973, with the enlargement to Denmark, Ireland and the United Kingdom, the European Community expanded its administrative structures to include, for the first time, a specific directorate for education and training within the Directorate-General responsible for research and science.

During the same period, Henri Janne was commissioned by the European Commission to carry out a study entitled *For a Community policy on education*. The study argued that it was easier to move goods between European countries than for a professional to move to work in another country²⁴. Janne's report already pointed to the possibility of "free movement of students" on the one hand, and "organised mobility", on the other, i.e. mobility following an agreement between two universities: the university of origin and the university of destination²⁵. This second approach of "organised mobility", considered more effective, was adopted by the Council of Ministers of Education on 9 February 1976 and in the following years, including in European education programmes such as Erasmus²⁶.

In the same period the Community saw the adoption of the Council Resolution of 6 June 1974 on the mutual recognition of diplomas, certificates and other formal qualifications. The Resolution establishes the principles (Art. I) and areas for cooperation between EC Member States in the field of education (Art. II), and also establishes the creation of an education committee, composed of representatives of the Member States and the Commission (Art. IV). The principles explicitly state the specificity of the programme of cooperation in the field of education in the work of progressive social and economic harmonisation of the European Communities, the fact that education cannot be considered merely a component of economic life; that cooperation must respect the diversity of educational policies and

²² European Parliament, *Treaty of Rome: Treaty establishing the European Economic Community*, 25 March 1957, <https://www.europarl.europa.eu/about-parliament/en/in-the-past/the-parliament-and-the-treaties/treaty-of-rome>. [last accessed 15 June 2026].

²³ European Commission: Directorate-General for Education, Youth, Sport and Culture, Pèpin, L., *The history of European cooperation in education...*, cit.

²⁴ «How much longer must we tolerate in Europe a state of affairs where it is easier to move goods from one place to another than for men to move about once it is a question of following a calling?», Janne, H., *For a Community policy on education*, European Communities Commission, 1973, p. 37. <https://aei.pitt.edu/5588/1/5588.pdf> [last accessed 15 June 2026].

²⁵ Janne, H., *For a Community policy on education*, European Communities Commission, 1973. <https://aei.pitt.edu/5588/1/5588.pdf> [last accessed 15 June 2026].

²⁶ Mohammed, N., *Recognition: Tools for good practice*, in Council of Europe (eds), *Recognition of Higher Education Qualifications: Challenges for the next Decade*, Forum Role Conference of the Higher Education and Research Committee (CC-HER), Malta, 26-28 October 1994, "Higher Education Series", Council of Europe Publishing, Strasbourg, 1 January 1996, pp. 99-141.

systems, and that harmonisation must therefore not be considered an end in itself. While the rationale of the document is rooted in the freedom of establishment, it covers a number of areas of activity, including better opportunities for the academic recognition of qualifications and periods of study, as well as the promotion of closer relations between education systems in Europe, greater cooperation between higher education institutions, encouragement of freedom of movement and mobility for teachers, students and researchers, in particular by removing obstacles to the mobility of these persons, and language teaching²⁷. The issue of university mobility, and with it the recognition of qualifications (including the academic ones), would take on particular importance two years later, following the 1976 Resolution of the Ministers of Education of the Member States, meeting within the Council²⁸.

The Resolution of the Council of the European Communities of 9 February 1976 (the so-called “action Programme in the Field of Education”)²⁹, provided for action to be taken at Community level to increase the possibilities for academic recognition of diplomas, periods of study and studies undertaken (point IV.16). The Commission was invited to implement the appropriate measures in coordination with the Education Committee. The Council of the European Communities and the Ministers of Education were to meet periodically to monitor the implementation of the programme, establish future guidelines and compare their policies.

The action programme covers a wide range of activities, from measures to improve cultural and vocational training opportunities for citizens of other Member States of the Community and non-member countries, to improving the correspondence between education systems in Europe, collecting documentation and statistics in the field of education, teaching foreign languages, and ensuring equal access to all forms of education³⁰. In the field of higher education, the Resolution provides for two actions aimed at improving the possibilities for academic recognition of diplomas and periods of study:

-  the drawing up of a report analysing the current situation with regard to the academic recognition of diplomas and containing proposals for the improvement of the situation and, if necessary, for the development of a network of agreements;

²⁷ Council of the European Communities, *Council Resolution of 6 June 1974 on the mutual recognition of diplomas, certificates and other evidence of formal qualifications*, “Official Journal of the European Communities”, Vol. 17, no. C98, 20 August 1974. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:1974:098:FULL>. Among the documents that contributed to the debate on European integration and cooperation in education was the report by Leo Tindemans, then Prime Minister of Belgium, on the European Union. In the section entitled “A citizen Europe”, in addition to measures to facilitate mobility (passports, infrastructure, etc.), he pointed the way towards greater cooperation in education, including by facilitating student exchanges, and suggested adopting a pragmatic approach to resolving problems related to the recognition of qualifications, seen as the biggest obstacle to integration between European education systems. He suggested encouraging agreements between universities and educational institutions to organise student exchanges and giving legal value to such agreements in order to facilitate the recognition of studies undertaken in various fields Tindemans, L., *European Union. Report by Mr Leo Tindemans, Prime Minister of Belgium, to the European Council*, “Bulletin of the European Communities”, Supplement 1, no. 76, 29 December 1975. https://aei.pitt.edu/942/1/political_tindemans_report.pdf [last accessed 15 June 2026].

²⁸ In the perspective of the European Parliament and of the Commission, the three Conventions of the Council of Europe did not lead to the expected results, and there was a need for Community action on this matter. European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation...*, cit.

²⁹ Council Resolution of the Council and of the Ministers of Education, meeting within the Council on 9 February 1976, comprising an action programme in the field of education, OJ C38, 19.02.1976.

³⁰ One of the first actions was the creation of the Eurydice network, set up in September 1980, and made up of a central office in Brussels and a network of national units set up by the Member States with optimal access to information on education policies and systems, mainly within the ministries of education or bodies close to them. It was only in the 1990s that Eurydice became an original source of comparative information on education systems in Europe. European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation...*, cit.

the organisation of consultations between those responsible for education policy and cooperation between higher education institutions to facilitate the recognition of periods of study and studies carried out (IV.16)³¹.

By implementing the action programme and incentive measures adopted in the 1976 Resolution, the EC began to provide financial support to Joint Study Programmes (JSPs), in order to strengthen cooperation between universities in different countries, promoting direct contacts and agreements and exchanges of students and teachers³². The JSPs were very important in building a foundation for cooperation between higher education institutions, which led to the subsequent launch of Erasmus, a mobility programme based on such cooperation within the framework of agreements between institutions.

The lack of a legal basis slowed down the drive for cooperation in education in the following years (1978-1980). The strategy adopted at that time was to link education more closely to economic and social development, an issue that was very important at the political level, especially after the first oil crisis in 1973-74 and due to issues related to unemployment (a single Directorate-General for Employment, Social Affairs and Education was created, incorporating the departments dealing with education and vocational training that had previously been separate)³³.

3.3 The 1980s: The Birth of NARIC, the Erasmus Programme, and the Directives on Professional Recognition

In April 1981, the Commission published a Communication to the Council on "Academic recognition of diplomas, degrees, university qualifications and periods of study", which analysed the situation, objectives and needs, as well as the progress already made in this field³⁴. The introduction to the Communication reviews the context and the political and legal basis for Community action in this area, starting with the Treaty of Rome. It refers to the Council Resolution of 6 June 1974 on the mutual recognition of diplomas, certificates and other qualifications, which highlighted the contribution of education policies to freedom of establishment, particularly for the liberal professions. The Communication then refers to the preamble to the Treaty of Rome, which emphasises the determination of the contracting parties «to lay the foundations of an ever-closer union among the peoples of Europe» and their resolution «to ensure, through common action, the economic and social progress of their countries by removing the barriers that divide Europe». In this sense, one of the main actions was to «eliminate obstacles to the free movement of persons between Member States» (Article 3(c))³⁵. Articles 49, 57(1) and 128 of the Treaty of

³¹ Council of the European Communities, Council Resolution of the Council and of the Ministers of education, meeting within the Council of 9 February 1976 comprising an action programme in the field of education, "Official Journal of the European Communities", Vol. 19, no. C38, 19 February 1976. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:1976:038:FULL>. [last accessed 15 June 2026]. The approach chosen was the more flexible approach of mutual recognition, rather than the idea of developing diploma equivalences that would be imposed from the top down. The term was actually used by the treaty for the recognition of diplomas for professional purposes. European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation...*, cit.

³² Between 1976 and 1986, over 600 joint study programmes were thus co-financed by the European Commission, involving more than 500 higher education institutions, paving the way for the future Erasmus programme. European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation...*, cit.

³³ European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation in education...*, cit.

³⁴ Commissione delle Comunità Europee, *Riconoscimento accademico dei diplomi, lauree, titoli universitari e dei periodi di studio. Comunicazione della Commissione al Consiglio*, Vol. 1981, no. 72, 29 April 1981. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:51981DC0186&from=FR> [last accessed 15 June 2026].

³⁵ Comunità Economica Europea, *Trattato che istituisce la Comunità Economica Europea e documenti allegati*, 1957. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:11957E/TXT> [last accessed 15 June 2026].

Rome are also cited. Reference is made to the Council Decision of 2 April 1963 laying down the general principles for the implementation of a common vocational training policy, and in particular the eighth principle, according to which «the common policy on vocational training must be geared towards the gradual approximation of training levels» in order to «achieve mutual recognition of certificates and other qualifications certifying the completion of vocational training»³⁶.

Also in the introduction, the Communication referred to the Council of Europe Conventions (Convention on the Equivalence of Diplomas leading to Admission to Universities³⁷, European Convention on the Equivalence of Periods of University Study³⁸, European Convention on the Academic Recognition of University Qualifications)³⁹ and to the UNESCO Convention on the Recognition of Studies and Diplomas in Higher Education in the Countries of the European Region⁴⁰ on this subject.

In the following section, the Communication outlines objectives and needs, identifying five different purposes for recognition:

-  enrolment in a first higher education course in another Member State;
-  transfer, without loss of acquired rights, from a higher education course started in one Member State to a similar course in another Member State;
-  pursuit of postgraduate studies or research in another Member State;
-  taking up employment in a Member State or starting self-employed activities with qualifications acquired in another Member State;
-  career development and advancement in another Member State.⁴¹

The Communication also emphasises «the importance of academic equivalence (mutual comparability of standards, based on appropriate and accurate information and mutual trust) in order to facilitate free movement between higher education institutions and professional recognition». The text clearly states that, in the Commission's view, the issue of «recognition and academic equivalence of diplomas and periods of study is an essential element of a comprehensive strategy aimed at removing obstacles to the free movement of persons». The approach is more operational than formal and legal:

³⁶ Comunità Economica Europea, *Il Consiglio, Decisione del Consiglio del 2 aprile 1963 relativa alla determinazione dei principi generali per l'attuazione di una politica comune di formazione professionale*, 20 April 1963. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:31963D0266> [last accessed 15 June 2026].

³⁷ *European Treaty Series* no. 1-5, Paris, 11 December 1953, signed by all countries that were members of the European Community at the time.

³⁸ Council of Europe, *Convenzione europea sull'equivalenza dei periodi di studi...*, cit.

³⁹ Council of Europe, *European Convention on the Academic Recognition of University Qualifications* "European Treaty Series", no.32, Paris, 14 December 1959. <https://rm.coe.int/16800656d0>.

⁴⁰ UNESCO, *Convention on the Recognition of Studies, Diplomas and Degrees...*, cit.

⁴¹ Commissione delle Comunità Europee, *Riconoscimento accademico dei diplomi, lauree, titoli universitari e dei periodi di studio. Comunicazione della Commissione al Consiglio*, Vol. 1981, no. 72, 29 April 1981. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:51981DC0186&from=FR> [last accessed 15 June 2026].

Community activities in this field should continue in order to complete the implementation by Member States of the various Council of Europe Conventions to which they are also signatories. At this stage, it is desirable to build on the terms of these Conventions, without envisaging new multilateral agreements, for example at Community level, and to adopt practical measures that can fill the existing gap in the field of information⁴².

The penultimate section of the documentation is devoted to highlighting the “progress to date”, including the expert report on the academic recognition of diplomas in the EC published by the Commission, the grant programme to support the development of joint study programmes between higher education institutions in different Member States, the work carried out by the European Centre for the Development of Vocational Training (CEDEFOP) and the work of Eurydice as an information network for education, which began in 1980.

Finally, objectives for the future are set out, including the creation of a network of national information units on academic equivalence in the various Member States:

1. The creation of a network of national information units on academic equivalence in the various Member States, which could make use of existing structures where these already exist and are operational. The purpose of the units is to collect and disseminate authoritative information on academic qualifications, without validating them, and without duplicating the national structures for the award of diplomas.
2. The creation of a central coordinating structure for the management and operation of a Community-wide network within the Commission's services;
3. A programme of six-monthly meetings of the heads of the national units to discuss trends, developments in the service and any problems organised by the Commission, plus an annual meeting for the heads of national academic equivalence information units, together with representatives of higher education institutions in the Member States, to exchange information on developments and trends at national level and to act as an advisory body to the Commission with a view to future needs that could be met by the network itself.

In addition, the network should plan to use new information technologies, the production of a handbook and a report every three years.⁴³

These proposals were approved by the Ministers at their meetings on 22 June 1981 and 2 June 1983. The need for countries to set up an information centre on the recognition of qualifications was one of the topics discussed at the meeting of the Education Committee on 20 and 21 October 1983 in Brussels, whose agenda included a wide range of issues related to the higher education sector, including the activities of information centres on university mobility and the recognition of academic qualifications. At the meeting of the Ministers of Education with the Council on 22 June 1981, there was consensus

⁴² Commissione delle Comunità Europee, *Riconoscimento accademico dei diplomi...*, cit.

⁴³ Commissione delle Comunità Europee, *Riconoscimento accademico dei diplomi...*, cit.

on the following points: the Community's activity in the field of recognition should be based on the Conventions already established within the framework of the Council of Europe in a spirit of complementarity, taking into account the need to cooperate also with countries that are not party to the Conventions; the desirability of bilateral and multilateral agreements on this subject; the establishment of joint programmes between higher education institutions and the mutual recognition of qualifications; the intensification of the work of Eurydice and cooperation with European Centre for the Development of Vocational Training (CEDEFOP). In the light of these indications, the Education Committee was instructed to draw up a report setting out possible guidelines for the future, so that it could be discussed by the Council and the Ministers of Education meeting within the Council at their next meeting at the end of the first half of 1982⁴⁴.

At the next meeting of the Council and the Ministers of Education meeting within the Council on 24 May 1982, the Education Committee's report on recognition is adopted and would be the subject of a new document. It was also agreed to set up a working group within the Education Committee to report on the state of academic recognition of diplomas and periods of study in the various Member States, and on the social and material situation, conditions of enrolment in courses and the reception given to healthcare professionals from other Member States⁴⁵.

At its meeting on 21-22 March 1983, the European Council «expressed the expectation that, in order to facilitate mobility between Member States, efforts would be intensified to achieve mutual recognition of diplomas and periods of study, both in the academic field and with regard to freedom of establishment»⁴⁶. The European Parliament drew up a recommendation encouraging, in particular, partial periods of study abroad and recognising the usefulness of national information centres, inviting Member States that did not yet have them to set them up. Following the report, a round table discussion was held in which the countries present outlined the situation at national level, the organic relationship, if any, between the Ministry and the centres, and the activities carried out. The meeting revealed that in most cases this task was carried out by a specially designated office within the Ministry of Education (e.g. Belgium, Denmark, France and Ireland). Other countries, on the other hand, had specialised agencies, such as Netherlands Universities Foundation for International Cooperation (NUFFIC) in the Netherlands, Διεπιστημονικό Κέντρο Αναγνώρισης Τίτλων Σπουδών Αλλοδαπής (Interdisciplinary Centre for the Recognition of Foreign Academic Titles) (DIKATSA) in Greece and the Deutscher Akademischer Austauschdienst (German Academic Exchange Service) DAAD in the Federal Republic of Germany.

Finally, during the meeting of the Council and the Ministers of Education within the Council on 2 June 1983, it was emphasised that, since the adoption of the action programme in the field of education on 9 February 1976, increasing mobility in higher education had been one of the main objectives of

⁴⁴ Council of the European Communities, *Projet de Procès-Verbal de la 714ème session du Conseil et des Ministres de l'Éducation réunis au sein du Conseil*, Luxembourg, 22 June 1981. Available at Historical Archive of the European Union: <https://www.eui.eu/en/academic-units/historical-archives-of-the-european-union>.

⁴⁵ Council of the European Communities, *Projet de Procès-Verbal de la 772ème session du Conseil et des Ministres de l'Éducation réunis au sein du Conseil*, Bruxelles, 24 May 1982, Available at Historical Archive of the European Union: <https://www.eui.eu/en/academic-units/historical-archives-of-the-european-union>.

⁴⁶ European Commission, DG Education and Culture (EAC), Higher Education Unit, *External Evaluation of the Network of National Academic Recognition Information Centres (NARIC) (Contract 2001-2108/001-001 SO2 86 EVAL)*, in Pragmatic Network of Individual European Consultants (eds), *Final Report*, Vol.1: main text, August 2002.

educational cooperation in the Community. The obstacles still existing to student mobility between Member States were highlighted. In addition to recognition problems, mention was made of the difficulties involved in financing studies abroad, uncertainties about the value of studies completed abroad once back in the country of origin, and the fear of encountering possible integration problems in the host country.

In its conclusions, the Council called on Member States to adopt a more constructive approach to this issue. The actions envisaged include:

-  regular exchange of information between the competent recognition centres designated for this purpose by the Member States, which, with the assistance of the Commission and the Eurydice information network, can offer advice and useful information to students, parents and their advisers, and potential employers within the European Community;
-  better opportunities for regular exchanges, information and meetings between those responsible for admissions and the evaluation of foreign qualifications;
-  intensifying the provision of information and advice for students considering a period of study in another Member State, particularly within higher education institutions (Community publications such as the *Student's Handbook* and organisations involved in promoting student mobility in Member States should play a particular role in this regard);
-  encouraging periods of study in another Member State.

The effectiveness of joint study programmes in supporting the removal of barriers to mobility is also noted and they are further encouraged through a series of suggested measures. Measures to overcome financial obstacles are urged. In addition, there are a number of concrete recommendations to support students wishing to study abroad. One example concerns the payment of university fees, whereby a foreign student should not be treated less favourably than a national student. The recommendation was to reduce or waive university fees for those moving from one country to another for a period of study, with the possibility of maintaining enrolment at the university of origin and the related insurance, if any⁴⁷.

Following requests submitted to the national delegations of the Education Committee, national information centres were set up in the 10 EC Member States (two for Belgium) towards the end of 1983⁴⁸. In 1984, the NARIC network was established, providing advice and information on the academic recognition of diplomas and study periods undertaken in other countries.

⁴⁷ Council of the European Communities, 849 Session of the Council and of Ministers of education. Press release 7351/83, "Historical Archive of the European Union", 2 June 1983. <https://www.eui.eu/en/academic-units/historical-archives-of-the-european-union>. This mechanism will be at the basis, few years later, of the Erasmus programme

⁴⁸ CIMEA, *Establishment and management of a Community network of information centres on the academic recognition of diplomas and periods of study*, CIMEA Archive NARIC Section, file AC/6, Vol. 48.

In most, if not all, Member States, the information centres coincided with those already established for the implementation of the Council of Europe and UNESCO Conventions on academic recognition and the equivalence of diplomas and periods of study, and the NARIC network worked in contact with the National European Information Centres (NEIC) and the National Information Bodies (NIB), the network of national equivalence information centres for mobility and university qualifications respectively of the Council of Europe and UNESCO. From the Commission's point of view, it was hoped that Community initiatives would encourage the development of effective agreements covering the whole of Europe, meeting the aspirations and needs of the various parties concerned⁴⁹.

A first meeting of the directors of the centres took place on 20 October 1983, under the auspices of the Education Committee⁵⁰.

In the following years, the network of centres expanded in parallel with the enlargement of the EC, also including candidate countries⁵¹.

Among the documents that contribute to informing the work of the future NARIC network are the reports and resolutions of the European Parliament on the academic recognition of diplomas and periods of study, including the report by Olaf Schwencke on the academic recognition of qualifications and periods of study. The report analyses all existing legislation on the subject at European level, emphasising that freedom of movement is one of the cornerstones of the Community and that it must also applied to students and researchers. It frames the issue of recognition as the most important element and a necessary prerequisite for an appropriate Community approach to its tasks in the field of education, social policy and employment, and calls on Member States that have not yet done so to ratify the Council of Europe and UNESCO Conventions on recognition, as well as calling for the implementation of the Directives. It also calls on the various actors involved to take a series of actions to support recognition, with a "generous and flexible" approach, and mobility, including the work of national information centres on the recognition of qualifications. The Resolution on "academic recognition of qualifications and periods of study" was approved on 14 March 1984⁵².

At the European Council meeting in Fontainebleau on 25 and 26 June 1984, the Heads of State and Government decided to set up an *ad hoc* committee to prepare measures to strengthen and promote the image and identity of Europe for its citizens and in the rest of the world. The planned actions ranged from the idea of a single European passport to the abolition of customs formalities at borders within

⁴⁹ Coordination with the Council of Europe and UNESCO on recognition was also reaffirmed at the May 1984 meeting of heads of national information centres on academic recognition of qualifications, at which the Commission reported that permanent arrangements were in place with the Council of Europe and UNESCO for regular meetings between secretariats to ensure effective coordination of efforts in this field and avoid duplication of effort. Representatives of both organisations were invited by the Commission to attend the meetings in November 1984 and thereafter as observers. "Heads of National Information Centres for the Academic Recognition of Diplomas and Periods of Study. Notes of the meeting held in Brussels on 18 and 19 June 1984", CIMEA, *Vita Naric*, Cimea Archive, File F/2 EEC.

⁵⁰ *Establishment and management of a Community network of information centres on the academic recognition of diplomas and periods of study*, document for the meeting of NARIC centre managers, 18-19 June 1984 (V/871/84-IT), the first of the regular meetings of the NARIC network.

⁵¹ Belgium, France, Germany, Italy, Luxembourg, the Netherlands, Denmark, Ireland, the United Kingdom, Greece. Cf. European Commission, DG Education and Culture (EAC), Higher Education Unit, *External Evaluation of the Network...*, Cit.

⁵² European Parliament, *Resolution on the academic recognition of diplomas and of periods of study*, in *Minutes of proceedings of the sitting of wednesday, 14 march 1984* no. C 104/64, 1984, 16 April, p. 5. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:1984:104:0060:0080:EN:PDF> [last accessed 15 June 2026].

the Community, the creation of common symbols such as a Community anthem and flag, and the minting of a European currency, called the ECU. These also included the definition of a general system of equivalence for university degrees, with a view to achieving effective freedom of establishment within the Community. Pietro Adonnino, representing Italy, was appointed to chair the Committee. The Committee presented its first report to the European Council in Brussels on 29-30 March 1985 with four main proposals relating to: I) freedom of movement for Community citizens; II) freedom of movement of goods, including transport services; III) administrative formalities for border areas; IV) greater opportunities for employment and residence. It is in this last area, and in particular in relation to the right of establishment, that the Committee included the issue of the recognition of qualifications. Given the wide variety of qualifications and courses of study in the Member States of the Community, harmonisation did not appear feasible, although it was desirable in some sectors. A general approach based on mutual recognition of diplomas or other examinations without prior harmonisation was proposed. Given the high profile of specific levels of training in Community countries, the new approach would introduce the principle of mutual trust and be based on the assumption that certificates issued in Member States are essentially comparable. Community institutions should set the objective and subsequently introduce a system leading to a recognition procedure for the various sectors.

The final report was then presented at the European Council meeting in Milan on 28-29 June 1985, where it was adopted. In addition to providing for the creation of common symbols, such as the European flag, the European anthem, the European passport and the European driving licence, the report proposed the learning of two languages in addition to the mother tongue, youth exchanges, the mobility of students and teachers, the recognition of diplomas and periods of study abroad, and the introduction of the European dimension into school education.

The role of cooperation in the university sector is emphasised, and it is proposed that a broad programme of mobility and exchange for university students be adopted, along with a European Academic Credit Transfer System (ECTS). Furthermore, the competent academic authorities of the Member States are asked to recognise, where this has not yet been done, the certificates and diplomas issued by the institutions under their control to citizens of other Member States in the same way as those issued to their own citizens⁵³. Following the adoption in June 1987 of the action plan for the mobility of university students, it was decided at Community level to “absorb” the newly established NARIC network into the Erasmus programme.

3.4 The First Meeting of the NARIC Network

The first meeting of the European Network of National Academic Recognition Information Centres (NARIC) took place in Brussels on 18-19 June 1984, at the headquarters of the Commission of the European Communities, with representatives from ten European countries: the six founding countries of the network (Italy, France, Germany, Belgium, the Netherlands and Luxembourg) and then the United Kingdom, Ireland, Denmark and Greece. The official languages were English and French. After an introduction by Domenico Lenarduzzi, Director of the “Cooperation in Education” Division, on the presentation of the objectives of the meeting, the agenda included a presentation of the state of the

⁵³ Adonnino, P., *A people's Europe. Reports from the ad hoc Committee*. “Bulletin of the European Communities” Supplement 7, no. 85, 1985. <https://repositori.uji.es/server/api/core/bitstreams/0b38d568-7a56-41c3-a026-6a38f0f1455a/content>.

art of the work of the individual centres, their role and activities, the methods of collaboration between the national centres, the possible facilitation role played by the Commission and the activities to be carried out at Community level. Space was also dedicated to any general problems in the field of academic recognition of qualifications and the joint work programme of the heads of national centres. In his introduction, Lenarduzzi, welcoming the participants to the first meeting that would create the network of national information centres on the academic recognition of qualifications, recalled how this was a central theme for the construction of the European Community and the implementation of one of the basic objectives of the Treaty of Rome⁵⁴: the free movement of persons. Updates from the European Commission on recent developments relevant to the centres were also shared: the results of the Council of Ministers of Education meeting on 4 June 1984, the European Parliament Resolution on the academic recognition of qualifications and periods of study, cooperation between higher education institutions, the feasibility study for a “catalogue” of diplomas in Europe, and the fourth edition of the Student Handbook. Lenarduzzi also introduced the idea that there would no longer be talk of equivalence, but of “recognition”⁵⁵. Lenarduzzi emphasised that the educational dimension – not provided for in the Treaty of Rome, and even in the absence of legal instruments – was moving forward in the interests of the Community⁵⁶.

The introduction is followed by a session providing information on the status of the activities of the individual centres, which supplements the information contained in the brochures prepared by Eurydice on each of them. The subsequent discussion takes as its starting point a *discussion paper* prepared by the Commission (V/871/84-IT, Brussels, 7 May 1984). The *discussion paper* indicated the main purpose of the centres: to provide users of the system with up-to-date information, thereby facilitating the mobility of students, teachers and researchers within the European Community.

The document outlined the tasks of the national centres:

-  collecting and maintaining up-to-date information on university qualifications in the Member States that award them, and keeping them in an orderly and up-to-date manner;
-  collecting information on the principles and practices governing the academic recognition process in their respective Member States;
-  gradually building up a “case file” based on the various requests submitted and the decisions taken or information provided in specific cases, so as to have a reference database for subsequent similar cases;
-  contacting the authorities or national centres of other countries for information support when necessary;
-  establishing links with other centres in order to convey information to end users quickly and efficiently;

⁵⁴ European Parliament, *Treaty of Rome...*, cit.

⁵⁵ CIMEA, *CIMEA Archive NARIC Section*, file AC/6, folder. 2

⁵⁶ Ibid.

ensuring that the role of the centres is not focused on the validation of qualifications but on providing information to enable the comparability of qualifications from different countries.

Finally, the document recognises the variety of natures and characteristics of the centres.

The discussion refers to the possibility of drawing up an annual report on the centres to keep the Commission and other centres up to date, and to the need to provide information to employers as well.

As a work plan, it was decided to organise two meetings a year, the first hosted in turn by one of the centres and the second hosted by the Commission in Brussels. Practical details were also decided, for example, the official languages of the meetings would be English and French, plus the language of the host country, while the preparatory documents would be in English and French. The following three meetings were therefore scheduled until the end of 1985, to be held in Germany, the United Kingdom and Brussels at the Commission. In addition, the possibility of organising short study visits of two or three people between the centres was discussed. Another topic was the management of information systems and the digitisation of the centres' internal archives, with some of them already engaged in the digital acquisition of their databases (Italy, Germany, the Netherlands and France), others in the evaluation and feasibility phase (United Kingdom, Denmark and Greece), and others not yet engaged in this area.

Eurydice would also begin digitisation in 1984, and one important aspect would be to offer the centres access to a digital archive of recognised qualifications in Europe. Another topic of the meeting was joint qualifications, with the presentation of the four existing types: double qualifications, i.e. awarded by both institutions; "sandwich" courses, with a mobility programme in one institution but the qualification awarded only by the institution of enrolment; courses with the final qualification awarded by the institution of enrolment plus a joint certificate awarded by all the institutions involved; and programmes with joint qualification. The last topic discussed was the relationship with the CoE and UNESCO, with regular meetings with the Updating Committee to avoid duplication of work, and with a commitment to invite them as observers to subsequent meetings⁵⁷.

4. Education: a Dimension for European Cooperation

The historical excursus shows the change in approach of the European Community institutions towards internationalisation of higher education and recognition of qualifications between the 1970s and the 1980s. While cooperation in education as such was not covered by the Treaty of Rome, and was mainly regarded as an area of action of other international organisations such as the Council of Europe, in the 1970s the European Community starts to look with interest at recognition of academic qualifications. This seems to have happened mainly for two reasons: policy makers framed the cooperation among higher education institutions and the mobility of staff and students in Europe within the context of measures to support freedom of establishment and the free movement of persons as key European pillars. Secondly, while at the end of the 1970s mobility and freedom of establishment were seen as

⁵⁷ CIMEA, *Meeting of university scholarship transferability managers*, CIMEA Archive, NARIC Section, file AC/6, Vol. 48.

instrumental to supporting employment and economic growth, in the 1980s cooperation in education was described progressively as one of the measures supporting the construction of European identity and integration. Recognition was regarded as a condition for successful mobility, giving the possibility to make full use learning and qualifications acquired in a different country.

This is evidenced by the fact that the activities of NARICs were embedded in the broader framework of the Erasmus programme, where they have remained today. This also shows their dimension as a “soft power” instrument: the lack of a specific legal basis for recognition of academic qualifications and cooperation in higher education did not prevent the creation of a network of national information centres providing information on recognition, supporting mobility, and indirectly supporting university cooperation.

This lack of legal basis for NARIC activities would be flagged several times (for instance in the first external evaluation of the NARIC network published in 2002⁵⁸) and would be one of the reasons for the drafting of the Joint ENIC-NARIC charter of activities and services in 2004⁵⁹.

While the absence of a strong legal basis remained for years, in 1985 a ruling of the European Court of Justice gave a broader interpretation of Article 128 of the Treaty of Rome, laying the basis for future action in the education field (the so called “Gravier case”)⁶⁰. This ruling, together with the political climate of the 1980s, which favoured the role of education as a tool for strengthening European identity and building a Europe of citizens, played a key role in enabling the strengthening of cooperation in the field of education and the launch of programmes in the education sector. In 1985, the Commission proposed programmes such as University–Enterprise Cooperation (COMETT) and Student Mobility and University Cooperation (ERASMUS), as well as Initial Training for Young People and Youth Exchanges (PETRA), Continuing Vocational Training (FORCE), Languages in Europe (Lingua), etc⁶¹. The role played by NARICs is also evident from the fact that some of them were also asked to perform the functions of “Information, promotion, support and dissemination service for the ERASMUS programme at universities, teachers and university students”, as in the case of Italy.

Another specificity is the cooperation that the NARIC network had from the very beginning with the two sibling networks of the Council of Europe and UNESCO, rooted in the respective Conventions, and therefore with greater legal strength. This cooperation would play an important role in subsequent developments in the recognition field, with the creation of the joint ENIC-NARIC network where the

⁵⁸ European Commission, DG Education and Culture (EAC), Higher Education Unit, *External Evaluation of the Network...*, Cit.

⁵⁹ Cf. Council of Europe, UNESCO-CEPES, *Joint ENIC/NARIC charter of activities and services*, 2004.

⁶⁰ European Union, *Document 61983CJ0293, Judgment of the Court of 13 February 1985. Françoise Gravier v City of Liège. Reference for a preliminary ruling: Tribunal de première instance de Liège - Belgium. Non-discrimination - Access to vocational training. Case 293/83. European Court Reports 1985 -00593*, 13 February 1985. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:61983CJ0293> [last accessed 15 June 2026].

⁶¹ It should be emphasised that the process was neither simple nor straightforward. For example, the adoption of Erasmus required 18 months of negotiations, with much resistance mainly related to the legal basis (Article 128 of the Treaty of Rome) and the Commission's financial commitment, which was considered too high for student mobility. The commitment to teacher mobility would have required a significantly lower commitment. The proposal was opposed by some countries (in particular the United Kingdom, Germany and France, which were the countries that would have had to contribute most financially), but also by student associations. The resistance was also linked to the reluctance to “cede sovereignty” in the field of education. AEGEE Europe, *The creation of Erasmus Programme, and the role of AEGEE*, Interview with Domenico Lenarduzzi, Honorary Director General, Directorate General for Education and Culture, European Commission, <https://www.youtube.com/watch?v=PpvbaBT8Bcc>. Carayol, D., *Erasmus a failli ne jamais exister, il y a vingt ans*, interview with Franck Biancheri, 18 January 2007, <https://www.agoravox.fr/actualites/europe/article/erasmus-a-failli-ne-jamais-exister-17965>, <https://franck-biancheri.eu/erasmus-was-most-likely-never-to-exist-david-carayol-2007/>.

ENIC was the result of the merging of the previous National European Information Centres (NEICs) and National Information Bodies (NIBs) networks, and the drafting of a joint CoE-UNESCO European Convention in the 1990s, the Lisbon Recognition Convention, in which experts from the networks played a central role.

5. The Role and Specificity of the NARIC Network

While the description of the specificity and the impact of the NARIC network at European and international level needs an ad hoc discussion, in the origins and establishment of the centres there are a few specific elements that constitute part of their institutional profile to this today.

The first is the rationale: as emerges from the analysis above, they were seen as an instrument to support recognition of academic qualifications and higher education cooperation, mobility and freedom of establishment, but also as part of the broader action of the European Union to enhance competitiveness and European integration.

A second element of specificity is their standing at least two levels: the national one, because they are "national" centres, i.e. established and funded by Member States, but also very much embedded in the international strategy and vision of the European integration process (and actually contributing both to its policies and its practices). Today, NARICs are considered not only the centres located in the 27 EU Member States, but also those located in the Erasmus+ programme countries. In many countries, such as Italy, NARIC have a close interrelation with higher education institutions and professionals working in the field of recognition and internationalisation within institutions, and play a key role in supporting the internationalisation of higher education at institutional and national level together with national authorities.

Thirdly, they were established under the auspices of the European Union, but they cooperated from the very beginning with the two other networks of national information centres of the Council of Europe and UNESCO, NEICs and NIB. In 1994 the two international organisations joined forces and NEICs and NIB merged into the ENIC networks. From the same year ENIC and NARIC have an annual joint meeting and – while remaining formally two separate networks – in practice they worked very much as a single network at different levels. This cooperation among three different international organisations makes the European ENIC-NARIC network a unique case. This cooperation is expressed also at the legal level, with the Council of Europe and UNESCO being the co-secretariats of the Lisbon Recognition Convention, the Convention regulating recognition in Europe adopted in 1997. This also makes the Lisbon Recognition Convention a unicum compared to the other UNESCO regional recognition Conventions. Another element is that they have been instrumental in creating understanding, transparency, acceptance and ultimately trust among European higher education systems. They piloted and tested many approaches and concepts that are now stable components of the European higher education landscape and of the higher education area, such as the concept of levels of qualifications, the diploma supplement, the shift from equivalence to acceptance of qualifications looking to their output and to their substantial similarities, but also more recently to the concept of automatic recognition.

Finally, all this has been accomplished with a very minimal formal definition of NARICs at European Union level. Their role was defined only in “soft law” policy documents, and the first formal “regulation” would appear in 2001, when the first Joint ENIC-NARIC charter of activities and services was drafted and adopted as a subsidiary text of the Lisbon Recognition Convention.

This approach of the European Community institutions laid the foundations for the action of the NARIC network in the following years, and supported the inclusion of education among the areas of competence of the Commission, in its action to support and supplement the action of the Member States, in the Maastricht Treaty in 1992.

Bibliography

Adonnino, P., *A people's Europe. Reports from the ad hoc Committee*. “Bulletin of the European Communities” Supplement 7, no. 85, 1985. <https://repositori.uji.es/server/api/core/bitstreams/0b38d568-7a56-41c3-a026-6a38f0f1455a/content>.

AEGEE Europe, *The creation of Erasmus Programme, and the role of AEGEE*, Interview with Domenico Lenarduzzi, Honorary Director General, Directorate General for Education and Culture, European Commission, 24 Decembre 2012. <https://www.youtube.com/watch?v=PpvbaBT8BCc>. [last accessed 15 June 2026].

Altbach, P. G., *The necessity and reality of differentiated postsecondary ecosystem*, in Altbach P. G., Reisberg, L., de Wit, H., (eds), *Responding to massification: Differentiation in postsecondary education worldwide*, SensePublishers Rotterdam, 2017, pp. 1-12.

Berg, C., Vlăsceanu, L., *The Europeanization of Higher Education: Integration and diversity as viewed from eastern Europe*, “Higher Education in Europe”, Vol. 16, no. 4, pp. 4-18, 1991.

Berhe, S., *Studenti internazionali nell'Italia repubblicana*, Storia di un'avanguardia, Mimesis, 2023.

Britannica Editors., *Iron Curtain*, “Encyclopedia Britannica”, 20 April 2026. <https://www.britannica.com/event/Iron-Curtain>. [last accessed 15 June 2026].

Brosan, G. S., *The Development of Polytechnics in the United Kingdom*, in *Diversifying Post-Secondary Education in Europe / La Diversification dans l'Enseignement Post-Secondaire en Europe / Der Ausbau des tertiären Bildungswesens in Europa*, “Paedagogica Europaea”, Vol. 7, 1972, pp. 41-53. <https://doi.org/10.2307/1502485>.

Carayol, D., *Erasmus a failli ne jamais exister, il y a vingt ans*, interview with Franck Biancheri, 18 January 2007. <https://www.agoravox.fr/actualites/europe/article/erasmus-a-failli-ne-jamais-exister-17965>, <https://franck-biancheri.eu/erasmus-was-most-likely-never-to-exist-david-carayol-2007/>.

Carpentier, V. *The History of Higher Education in Modern Europe*, in Rury, J. L., Tamura E.H (eds.) *The Oxford Handbook of The History of Education*, Oxford, University Press, Oxford, 2019.

Commissione delle Comunità Europee, *Riconoscimento accademico dei diplomi, lauree, titoli universitari e dei periodi di studio. Comunicazione della Commissione al Consiglio*, Vol. 1981, no. 72, 29 April 1981. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:51981DC0186&from=FR> [last accessed 15 June 2026].

Comunità Economica Europea, *Trattato che istituisce la Comunità Economica Europea e documenti allegati*, 1957. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:11957E/TXT> [last accessed 15 June 2026].

Comunità Economica Europea, *Il Consiglio, Decisione del Consiglio del 2 aprile 1963 relativa alla determinazione dei principi generali per l'attuazione di una politica comune di formazione professionale*, 20 April 1963. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:31963D0266> [last accessed 15 June 2026].

Council of Europe, *Convenzione europea sull'equivalenza dei periodi di studi universitari*, "Serie dei Trattati Europei", no. 138, 6 Novembre 1990. <https://rm.coe.int/168007b3f3> [last accessed 15 June 2026].

Council of Europe, *Convenzione europea sull'equivalenza dei periodi di studi universitari*, "Serie dei Trattati Europei", no. 21, 15 Dicembre 1956. <https://rm.coe.int/16800645c9> [last accessed 15 June 2026].

Council of Europe, *Convention on the Recognition of Qualifications concerning Higher Education in the European Region*, "European Treaty Series", no. 165, Lisbon, 11 April 1997. <https://rm.coe.int/168007f2c7> [last accessed 15 June 2026].

Council of Europe, UNESCO-CEPES, *Joint ENIC/NARIC charter of activities and services*, 2004.

Council of Europe, *European Cultural Convention*, "European Treaty Series", no. 18, Paris, 19 December 1954. <https://rm.coe.int/168006457e> [last accessed 15 June].

Council of Europe, *European Convention on the General Equivalence of Periods of University Study*, "Treaty Office", no. 138, Strasburg, 6 November 1990. <https://rm.coe.int/16809002c3> [last accessed 15 June 2026].

Council of the European Communities, *Council Resolution of 6 June 1974 on the mutual recognition of diplomas, certificates and other evidence of formal qualifications*, "Official Journal of the European Communities", Vol. 17, no. C98, 20 August 1974. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:1974:098:FULL> [last accessed 15 June 2026].

Council of the European Communities, *Council Resolution of the Council and of the Ministers of education, meeting within the Council of 9 February 1976 comprising an action programme in the field of education*, "Official Journal of the European Communities", Vol. 19, no C38, 19 February 1976. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:1976:038:FULL>. [last accessed 15 June 2026].

Council of the European Communities, *Projet de Proces-Verbal de la 714ème session du Conseil et des Ministres de l'Education réunis au sein du Conseil tenue à Luxembourg, le lundi 22 juin 1981*, 22 June 1981. <https://www.eui.eu/en/academic-units/historical-archives-of-the-european-union> [last accessed 15 June 2026].

Council of the European Communities, *Projet de Proces-Verbal de la 772ème session du Conseil et des Ministres de l'Education réunis au sein du Conseil*, Bruxelles, 24 May 1982, Available at Historical Archive of the European Union: <https://www.eui.eu/en/academic-units/historical-archives-of-the-european-union> [last accessed 15 June 2026].

Council of the European Communities, *849 Session of the Council and of Ministers of education. Press release 7351/83*, 2 June 1983. Available at Historical Archive of the European Union: <https://www.eui.eu/en/academic-units/historical-archives-of-the-european-union> [last accessed 15 June 2026].

CIMEA, *Establishment and management of a Community network of information centres on the academic recognition of diplomas and periods of study*, CIMEA Archive NARIC Section, file AC/6, Vol. 48.

CIMEA, Vita Naric, Cimea A CIMEA, *Meeting of university scholarship transferability managers*, CIMEA Archive NARIC Section, file AC/6, Vol. 48.

European Commission: Directorate-General for Education, Youth, Sport and Culture, Pépin, L., *The history of European cooperation in education and training, Europe in the making: An example*, Publications Office of the European Union, 2006.

European Commission, DG Education and Culture (EAC), *Higher Education Unit, External Evaluation of the Network of National Academic Recognition Information Centres (NARIC) (Contract 2001-2108/001-001 SO2 86 EVAL)*, in Pragmatic Network of Individual European Consultants, (eds), Final Report, Vol.1: main text, August 2002.

European Community, *Risoluzione del Consiglio e dei Ministri della Pubblica Istruzione Riuniti in Sede di Consiglio*, 9 February 1976. <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:41976X0219&from=IT> [last accessed 15 June 2026].

European Parliament, *Report drawn up on behalf of the Committee on Youth, Culture, Education, Information and Sport on the academic recognition of diplomas and periods of study. Rapporteur: Mr O. Schwencke*. "Working Documents 1983-1984", Document 1-1354/83, European Communities, 13 February 1984. <https://aei.pitt.edu/63773/>.

European Parliament, *Resolution on the academic recognition of diplomas and of periods of study, in Minutes of proceedings of the sitting of Wednesday*, 14 march 1984 no. C 104/64, 1984, 16 April, p. 5. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:1984:104:0060:0080:EN:PDF> [last accessed 15 June 2026].

European Union, Document 61983CJ0293, *Judgment of the Court of 13 February 1985. Françoise Gravier v City of Liège. Reference for a preliminary ruling: Tribunal de première instance de Liège - Belgium. Non-discrimination - Access to vocational training. Case 293/83. European Court Reports 1985 -00593*, 13 February 1985. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:61983CJ0293> [last accessed 15 June 2026].

Guri-Rosenblit, S., Sebkova, H., Teichler, U., *Massification and Diversity of Higher Education Systems: Interplay of Complex Dimensions*. UNESCO, Paris, 14 February 2007. <https://unesdoc.unesco.org/ark:/48223/pf0000157816> [last accessed 15 June 2026].

Higher Education Compass, *History of the universities of applied sciences*, 2026. <https://www.hochschulkompass.de/en/higher-education-institutions/history/history-of-the-universities-of-applied-sciences.html> [last accessed 15 June 2026].

International Association of Universities (IAU), UNESCO, *What is WHED?* 2026, <https://whed.net/About.html> [last accessed 15 June 2026].

Janne, H., *For a Community policy on education*, European Communities Commission, 1973. <https://aei.pitt.edu/5588/1/5588.pdf> [last accessed 15 June 2026].

Lantero, L., Finocchietti, C. (eds), *Accordo Italia-Austria sul riconoscimento automatico dei titoli di studio. Storia, attuazione, impatto sociale*. Laterza, 2023.

Lewis, M. S., *The Polytechnics: A Peculiarly British Phenomenon*, "Regional Development II", Vol. 2, no. 4, 1991. pp. 24-34. <https://journals.indianapolis.iu.edu/index.php/muj/article/view/19224>. [last accessed 15 June 2026].

Maassen, P., Musselin, C., European Integration and the Europeanisation of Higher Education, in Amaral, A., Neave, G., Musselin, Ch. et al., (eds), *European Integration and the Governance of Higher Education and Research*. Springer, 2009, pp- 3-17.

Mohammed, N., *Recognition: Tools for good practice*, in Council of Europe (eds), *Recognition of Higher Education Qualifications: Challenges for the next Decad*, Forum Role Conference of the Higher Education and Research Committee (CC-HER), Malta, 26-28 October 1994, "Higher Education Series", Council of Europe Publishing, Strasbourg, 1 January 1996, pp. 99-141.

Tindermans, L., *European Union. Report by Mr Leo Tindemans, Prime Minister of Belgium, to the European Council*, "Bulletin of the European Communities", Supplement 1/76, 29 December 1975. https://aei.pitt.edu/942/1/political_tindemans_report.pdf. [last accessed 15 June 2026].

Tralongo, S., *Les instituts universitaires de technologie: Des spécificités originelles aux transformations récentes*, "Diversité", Vol. 1, no. 202, 2023, pp. 201-213. <http://journals.openedition.org/diversite/3871> [last accessed 15 June 2026].

UNESCO, *Higher education: Figures at a glance*, 2025. <https://unesdoc.unesco.org/ark:/48223/pf0000394112>.

UNESCO, *Convention on the Recognition of Studies, Diplomas and Degrees Concerning Higher Education in the States Belonging to the Europe Region*, no. 20966, 21 Dicembre 1979. <https://www.unesco.org/en/legal-affairs/convention-recognition-studies-diplomas-and-degrees-concerning-higher-education-states-belonging> [last accessed 15 June 2026].

UNESCO, *Code of Good Practice in the Provision of Transnational Education*, Paris, 2025. <https://rm.coe.int/code-of-good-practice-in-tne-adopted-on-22-october-2025/4880291d8e> [last accessed 15 June 2025].

UNESCO UIS, *Gross enrolment ratio for tertiary education, both sexes (%)* [Data set], 2026. <https://databrowser.uis.unesco.org/>.

Univeristas, *La svolta dell'Est*, (The turning point in the East), "Universitas", Vol.36, XI, no. 2, Fratelli Palombi Editori, 1986, pp. 3-38.

Enhancing the European Dimension of Higher Education: The European Higher Education Area Approach

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| Abstract

The building of a European Dimension of higher education, a European approach to higher education built on shared values, is currently one of the priorities of the European Union (EU) to face the current global challenges. The EU contributes to its development through funding schemes and a common policy agenda, positioning itself as the main actor in this process. However, the European dimension is the result of a more complex path, where the Bologna Process and its related European Higher Education Area (EHEA) play a major role. In fact, the Bologna Process was the first initiative to bring together countries and key stakeholders, including the European Commission, and to launch a collectively approved vision and mission for European higher education. Since 1999, through its *Ministerial Communiqués* the Bologna Process has been contributing to include the European dimension in the daily practices of European higher education. This study investigates how, and in which policy domains, the EHEA, through its *Ministerial Communiqués*, contributes to the European dimension of higher education through an approach distinct from EU action. This policy analysis identifies five main policy domains through which the EHEA advances the European dimension: fundamental values, mobility, recognition, quality culture, and the social dimension. The findings demonstrate that the EHEA constitutes a distinct and influential framework shaping European higher education. Rather than merely complementing EU action, it provides the normative and institutional backbone of the European dimension and plays a co-primary role in its consolidation and evolution.

Keywords: European Dimension, Europeanisation, European Higher Education Area, European Union, Bologna Process, Higher Education¹

¹ Declaration of Authorship and Use of AI: I declare that I am the author of this essay, and that I carried out the work by myself. I acknowledge the use of ChatGPT to review the English grammar of my writing.

1. Introduction

Since the founding of the first European university, the University of Bologna, in 1088, higher education in Europe has traditionally been governed by nation-states². From the medieval period to contemporary Europe³, higher education has both reflected and reinforced national state-building processes⁴. Moreover, higher education institutions (HEIs) supplied the professional elites and the intellectual frameworks required by national administrations⁵. Yet reducing European higher education to a collection of national systems obscures the extent to which policy developments have also influenced higher education across borders⁶ and contributed to the emergence of a broader European space for higher education⁷. To fully grasp contemporary higher education in the European area, it is thus necessary to go beyond a national dimension and to focus on a broader scale: the European scale.

In the European context, the European Higher Education Area (EHEA), a voluntary and intergovernmental initiative launched in 2010 to promote the harmonisation of higher education within the framework of the Bologna Process (BP)⁸, and the European Union (EU), a formal legal organisation at the supranational level beyond the field of higher education⁹, have each contributed to shaping European higher education along their own unique dimension: the European dimension. Referred to in the early *Ministerial communiqués*¹⁰, the strategic declarations of the BP and the EHEA, which progressively

² Neave, G., *The European Dimension in Higher Education: An Excursion into the Modern Use of Historical Analogues*. in Huisman, J., Maassen, P. A. M., Neave, G., (eds.), *Higher Education and the Nation State. The International Dimension of Higher Education*, Elsevier, Oxford, 2001, pp. 13-73.

³ de Wit, H., Altbach, P. G., *Internationalization in higher education: Global trends and recommendations for its future*. "Policy Reviews in Higher Education", Vol. 5, no. 1, 2021, pp. 28-46. <https://doi.org/10.1080/23322969.2020.1820898>. Stichweh, R., *The University as a World Organization*. In Mattei, P., Durmay, X., Mangez, E., et al., (eds.), *The Oxford Handbook of Education and Globalization*, Oxford University Press, Oxford, 2023, pp. 424-442, <https://doi.org/10.1093/oxfordhb/9780197570685.013.46>. Tight, M., *Globalization and internationalization as frameworks for higher education research*. "Research Papers in Education", Vol. 36, no. 1, 2021, pp. 52-74. <https://doi.org/10.1080/02671522.2019.1633560>.

⁴ Enders, J., *Higher education, internationalisation, and the nation-state: Recent developments and challenges to governance theory*. "Higher Education", no. 47, 2004, pp. 361-382. <https://doi.org/10.1023/B:HIGH.0000016461.98676.30>.

⁵ Chou, M-H., Huisman, J., Lorenzo, M. P., *Regional cooperation in higher education*. in Lombaerde, P. D., (ed.), *Handbook of Regional Cooperation and Integration*, Edward Elgar Publishing, Northampton, 2024, pp. 266-288. <https://doi.org/10.4337/9781800373747.00020>; de Wit, H., Altbach, P. G., *Internationalization in higher education...*, cit.

⁶ Crăciun, D., *National Policies for Higher Education Internationalization: A Global Comparative Perspective*. in Curaj, A., Deca, L., Procopie, R., (eds), *European Higher Education Area: The Impact of Past and Future Policies*, Springer, Cham, 2018, pp. 95-106. https://doi.org/10.1007/978-3-319-77407-7_7. Crăciun, D., *Systematizing national higher education internationalization strategies: Reconceptualizing a process*, PhD Thesis, Central European University, 2019. <https://www.ceeol.com/search/article-detail?id=440904> [last accessed 30 June 2026].

⁷ Brooks, R., Rensimer, L., *The European Universities Initiative and European spatial imaginaries*. "Globalisation, Societies and Education", Vol. 23, no. 3, 2023, pp. 752-765. <https://doi.org/10.1080/14767724.2023.2210515>. Marginson, S., *Space and scale in higher education: The glonacal agency heuristic revisited*. "Higher Education", Vol. 84, no. 6, 2022, pp. 1365-1395. <https://doi.org/10.1007/s10734-022-00955-0>.

⁸ Elken, M., Vukasovic, M., *Dynamics of voluntary coordination: Actors and networks in the Bologna Process*, in Chou, M.H., Gornitzka, Å., (eds), *Building the Knowledge Economy in Europe*. Edward Elgar Publishing, Northampton, 2014, pp.131-159. <https://doi.org/10.4337/9781782545293.00011>. Rich, D., *The Bologna Process in European Higher Education*, in Peterson, P., Baker, E., McGaw, B., (eds.) *International Encyclopedia of Education*, Elsevier Science, Oxford, 2010, pp. 566-572 <https://doi.org/10.1016/B978-0-08-044894-7.00848-4>

⁹ Publications Office of the European Union, *Glossary: European Union (EU)*, Publications Office of the European Union, 15 September 2025, https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=LEGISSUM:eu_union [last accessed 30 June 2026].

¹⁰ European Higher Education Area, *The Bologna Declaration of 19 June 1999: Joint declaration of the European Ministers of Education*, 19 June 1999, http://www.ehea.info/Upload/document/ministerial_declarations/1999_Bologna_Declaration_English_553028.pdf, [last accessed 30 June 2026]. European Higher Education Area, *TOWARDS THE EUROPEAN HIGHER EDUCATION AREA; Communiqué of the meeting of European Ministers in charge of Higher Education in Prague on May 19th 2001*, 19 May 2001, http://www.ehea.info/Upload/document/ministerial_declarations/2001_Prague_Communique_English_553442.pdf [last accessed 30 June 2026]. European Higher Education Area, *Realising the European Higher Education Area" Communiqué of the Conference of Ministers responsible for Higher Education in Berlin on 19 September 2003*, 19 September 2003, https://ehea.info/Upload/document/ministerial_declarations/2003_Berlin_Communique_English_577284.pdf [last accessed 30 June 2026].

updated and expanded their list of objectives¹¹, and in the early EU policies on higher education¹², the European dimension has remained a recurring element, more or less explicitly, in both academic and policy discourse. It made its most recent appearance in the latest EU higher education strategy¹³. More specifically, in the current higher education landscape, the European dimension constitutes a declared key objective of the EU to promote transnational cooperation as a clearly visible European approach¹⁴.

In this regard, the EU identified four flagship initiatives aimed at strengthening the European dimension of higher education: the European Universities Initiative (EUI), a legal status for the EUI alliances, a joint European degree, and the European Student Card Initiative¹⁵. Nevertheless, the contemporary European dimension should not be understood solely as an EU concept. Although the relevant strategy was issued by the EU, the EHEA plays an equally central role in reinforcing the European dimension, while doing so through its own distinctive approach. Indeed, the EU strategy explicitly acknowledges that it builds upon the transformative initiatives of the EHEA¹⁶. The European dimension should therefore be understood as the product of the combined contributions of both the EU and the EHEA, which share the objective of «promot[ing] synergies [...] in a fit-for-purpose and flexible manner»¹⁷.

Although the importance of synergies between the EU and the EHEA is emphasised, the EU policies do not provide specific indications as to how the EHEA contributes to the European dimension. Yet the EHEA advances a distinctive voluntary and collaborative approach that strengthens the European dimension through dynamics that differ from those of the EU and should therefore be analytically disentangled. Given that the EHEA's approach can be identified directly in its principal programmatic documents, namely the *Ministerial communiqués*¹⁸, this study is guided by the following research question: how, and in which policy domains, does the EHEA through its *Ministerial Communiqués* contribute to the European dimension of higher education through an approach distinct from EU action?

This article is situated within the broader literature on Europeanisation and governance in European higher education, which has extensively conceptualised the mechanisms through which European pressures shape national higher education systems¹⁹, and has mapped the multi-level, multi-actor

¹¹ Bergan, S., *The European Higher Education Area: A road to the future or at way's end?*, "Tuning Journal for Higher Education", Vol. 6, no. 2, 2019, pp. 23-49. [https://doi.org/10.18543/tjhe-6\(2\)-2019pp23-49](https://doi.org/10.18543/tjhe-6(2)-2019pp23-49).

¹² Adonnino, P., *A People's Europe: Reports from the ad hoc Committee*, Comité ad hoc 'Europe des citoyens', 29 June 1985, <https://www.ombudsman.europa.eu/en/historical/en/4659> [last accessed 30 June 2026]. Janne, H., *For a Community policy on education*, European Communities Commission, 1973, <http://aei.pitt.edu/5588/1/5588.pdf> [last accessed 30 June 2026]. Council of the European Communities, *On Measures for Developing the European Dimension in Higher Education*, "Official Journal of the European Union", C/336/27, 1992. Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:41992X1219\(02\)&qid=1769782636724](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:41992X1219(02)&qid=1769782636724) [last accessed 30 June 2026].

¹³ Council of the European Union, *Council Recommendation of 5 April 2022 on Building Bridges for Effective European Higher Education Cooperation (Text with EEA Relevance)*, "Official Journal of the European Union", C/160/01, 2022, Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0413\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0413(01)&from=EN) [last accessed 30 June 2026]. European Commission, *COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS on a European Strategy for Universities*, no. 16, 18 January 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52022DC0016> [last accessed 30 June 2026].

¹⁴ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

¹⁵ Ibid.

¹⁶ Council of the European Union, *Council Recommendation of 5 April 2022...*, cit. European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

¹⁷ Ibid.

¹⁸ Bergan, S., *The European Higher Education Area...*, cit.

¹⁹ Ibid. Vukasovic, M., *Change of higher education in response to European pressures: Conceptualization and operationalization of Europeanization of higher education*. "Higher Education", Vol. 66, no. 3, 2013, pp. 311-324. <https://doi.org/10.1007/s10734-012-9606-4>.

and multi-issue character of EHEA governance²⁰. This literature, however, has primarily focused on governance processes and convergence dynamics, while the European dimension itself, the substantive content that these processes construct, diffuse, and institutionalise, has remained comparatively under-examined as an analytical object in its own right, despite its renewed prominence in the EU's most recent higher education strategy. Moreover, existing accounts tend to treat EU and EHEA action jointly, without systematically disentangling their contributions.

This article addresses both gaps. It adopts an original approach by treating the European dimension, a concept often invoked yet vaguely defined in current policy, as the primary analytical object, and by tracing systematically (i.e. across five policy domains identified in the EHEA's *Ministerial Communiqués*) how the EHEA constructs, diffuses, and institutionalises this dimension through mechanisms distinct from those of the EU. Such an analysis may be of value to both researchers and practitioners operating at the supranational or university level, enabling them to develop and implement initiatives in a more informed manner. In addition, the article contributes to unpacking the concept of the European dimension in policy, bridging theory and practice, and disentangling the contribution of the EHEA from that of the EU.

This article is structured as a policy analysis, using a descriptive method²¹ to examine the *Ministerial communiqués* of the EHEA to highlight their main policy domains and describe the related initiatives and instruments. The first two sections provide contextual and theoretical clarity, first by describing the role of the EHEA in higher education, and then by defining the European dimension and Europeanisation. The subsequent section constitutes the core of the article, in which the *Communiqués* are presented and analysed through their main policy domains (i.e. fundamental values of higher education, mobility, recognition, quality culture, and social dimension). The policy domains and the mechanisms of the EHEA are connected to the current literature and to the EU, underscoring potential overlaps and tensions. Finally, the conclusion summarises the findings and advances their implications for European higher education.

2. The Role and Structure of the EHEA in Higher Education

The EHEA is a voluntary and inter-governmental initiative, focused on the higher education sector²². It originated primarily in the *Sorbonne Declaration*, signed by four ministers of higher education²³, and it was officially declared as an objective of 29 countries through the signature in 1999 of the *Bologna Declaration*²⁴. The EHEA was officially launched in 2010 with the signature of the *Budapest-Vienna*

²⁰ Vukasovic, M., Jungblut, J., Chou, M.-H., et al., *Multi-level, Multi-actor and Multi-issue Dimensions of Governance of the European Higher Education Area, and Beyond*, in Curaj, A., Deca, L., Pricopie, R., (eds), *European Higher Education Area: The Impact of Past and Future Policies*, Springer, Cham, 2018, pp. 321-334. https://doi.org/10.1007/978-3-319-77407-7_20. Cornitzka, Å., Stensaker, B., *The dynamics of European regulatory regimes in higher education—Challenged prerogatives and evolutionary change*, "Policy and Society", Vol. 33, no. 3, 2014, pp. 177-188. <https://doi.org/10.1016/j.polsoc.2014.08.002>.

²¹ Creswell, J. W., *Research design: Qualitative, quantitative, and mixed methods approaches*, SAGE, Thousands Oaks, 2023.

²² Elken, M., Vukasovic, M., *Dynamics of voluntary coordination...*, cit. Rich, D., *The Bologna Process in European Higher Education...*, cit.

²³ European Higher Education Area, *Sorbonne Joint Declaration: Joint declaration on harmonisation of the architecture of the European higher education system*, 25 May 1998, http://www.ehea.info/media.ehea.info/file/1998_Sorbonne/61/2/1998_Sorbonne_Declaration_English_552612.pdf [last accessed 30 June 2026].

²⁴ European Higher Education Area, *The Bologna Declaration...*, cit.

*Declaration*²⁵. Today it includes 47 full members²⁶, both within and beyond the EU, all of which agree to be parties to the European Cultural Convention (1955)²⁷ and to commit to the principles and objectives of the BP²⁸. Besides its full members, the EHEA also involves eight consultative members supporting follow-up work²⁹: Business Europe, the Council of Europe, Education International, the European Association for Quality Assurance in Higher Education, the European Students Union, the European University Association, UNESCO and the European Association of Institutions in Higher Education³⁰.

The main goal of the EHEA is to promote and reinforce coordination in European higher education³¹. To do so, the EHEA regularly updates and expands its list of objectives through official declarations signed by all members, namely the *Ministerial Communiqués*, which usually set out the commitments of EHEA members every two years³². The *Communiqués* are the outcomes of the Ministerial Conferences, reporting on progress achieved and setting future objectives³³. Alongside the *Communiqués*, the Bologna Follow-Up Group (BFUG), the executive body of the EHEA composed of 47 members and the European Commission, supports the implementation of the commitments set out in the *Communiqués*³⁴ and establishes the Working Groups, addressing specific topics of the EHEA³⁵. The Bologna Implementation Coordination Group complements this structure by focusing on three key commitments (i.e. qualification frameworks, the Lisbon Recognition Convention, and quality assurance) and the social dimension³⁶.

Implementation of the EHEA commitments is voluntary for each member, and it is articulated through multi-level and multi-actor coordination³⁷. The EHEA's main method of implementation is the *Open Method of Coordination (OMC)*³⁸, which fosters policy convergence through a voluntary, guidelines-driven, peer-learning and monitoring system³⁹. What is declared in the *Communiqués* and set by the BFUG at the supranational level is received and interpreted by its member states at the national level,

²⁵ European Higher Education Area, *Budapest-Vienna Declaration on the European Higher Education Area*, 12 March 2010, http://www.ehea.info/Upload/document/ministerial_declarations/Budapest_Vienna_Declaration_598640.pdf [last accessed 30 June 2026].

²⁶ Russian Federation and Belarus have been suspended since April 2022, due to the Russian full-scale invasion of Ukraine.

²⁷ Council of Europe, *European Cultural Convention*, "European Treaty Series", no. 18, 19 December 1954, <https://rm.coe.int/168006457e> [last accessed 30 June 2026].

²⁸ European Higher Education Area, *The European Higher Education Area (EHEA)*, 2026a, <http://www.ehea.info/page-the-bologna-follow-up-group> [last accessed 30 June 2026].

²⁹ European Higher Education Area, *TOWARDS THE EUROPEAN HIGHER EDUCATION AREA...*, cit.

³⁰ European Higher Education Area, *Consultative Members*, 2026b, <https://ehea.info/page-consultive-members> [last accessed 30 June 2026].

³¹ Vukasovic, M., *European-level policy dynamics in higher education*. in Zahariadis, N., Buonanno, L., (eds), *The Routledge Handbook of European Public Policy*, Routledge, London, 2017, pp. 373-379. <https://doi.org/10.4324/9781315682723-39>.

³² Bergan, S., *The European Higher Education Area...*, cit.

³³ European Higher Education Area, *Ministerial Declarations And Communiqués*, 2026c, <http://www.ehea.info/page-ministerial-declarations-and-communiques> [last accessed 30 June 2026].

³⁴ European Higher Education Area, *The European Higher...*, cit.

³⁵ Ibid.

³⁶ European Higher Education Area, *Bologna Implementation Coordination Group*, 2026d, <https://ehea.info/working-group/bologna-implementation-coordination-group/> [last accessed 30 June 2026].

³⁷ Vukasovic, M., Jungblut, J., Chou, M-H., et al., *Multi-level, Multi-actor and...*, cit.

³⁸ Alexiadou, N., Fink-Hafner, D., Lange, B., *Policy Convergence through the Open Method of Coordination: Theoretical Reflections and Implementation in 'old' and 'new' National Contexts*, "European Educational Research Journal", Vol. 9, no. 3, 2010, pp. 345-358. <https://doi.org/10.2304/eej.2010.9.3.345>. Brøgger, K., *The rule of mimetic desire in higher education: Governing through naming, shaming and faming*, "British Journal of Sociology of Education", Vol. 37, no. 1, 2016, pp. 72-91. <https://doi.org/10.1080/01425692.2015.1096191>.

³⁹ Alexiadou, N., Fink-Hafner, D., Lange, B., *Education Policy Convergence...*, cit. Brøgger, K., *The rule of mimetic...*, cit.

and by the HEIs at the subnational level⁴⁰. Even though the EHEA does not directly provide funding to promote its objectives, the OMC encourages members to compare themselves with and monitor one another, a process effectively described as «naming, shaming, and faming»⁴¹, and consequently to invest in initiatives aimed at harmonising their higher education systems according to the EHEA⁴².

The European Commission has been among the full members of the EHEA, since its inception and it is actively involved in its implementation⁴³. This involvement underscores the close link between the EHEA and the EU⁴⁴. Nonetheless, it is important to disentangle the two. The EU is a formal legal organisation composed of 27 member states regulated by EU Treaties and operating in the political and economic sphere at the supranational level⁴⁵, with higher education strategy forming part of a broader agenda. The EU has only a supporting competence in the field of higher education⁴⁶, meaning that can only support, coordinate or complement the action of its member states⁴⁷. While it shares the OMC with the EHEA⁴⁸, the EU, unlike the EHEA, relies heavily on comprehensive funding schemes, such as ERASMUS+⁴⁹ and Horizon Europe⁵⁰, which serve as pivotal drivers in encouraging HEIs and national governments to contribute the EU's policy objectives⁵¹. These differences position the EU as a distinct actor from the EHEA, as shown in Table 1, with which it nonetheless aims to foster and strengthen the European dimension of higher education.

⁴⁰ De Boer, H. F., Huisman, J., *Governance Trends in European Higher Education*, in Capano, G., Jarvis, D. S. L., (eds), *Convergence and Diversity in the Governance of Higher Education*, Cambridge University Press, Cambridge, 2020, pp. 333–354. <https://doi.org/10.1017/9781108669429.013>; Vukasovic, M., *European-level policy dynamics...*, cit.

⁴¹ Brøgger, K., *The rule of mimetic...*, cit.

⁴² European Education and Culture Executive Agency. Eurydice, *The European higher education area in 2024: Bologna process implementation report*, Publications Office of the European Union, Brussels, 2024. <https://doi.org/10.2797/351309>.

⁴³ European Education and Culture Executive Agency. Eurydice, *The European higher education...*, cit.

⁴⁴ European Commission. Directorate General for Education, Youth, Sport and Culture, *The EU in support of the Bologna process*, Publications Office of the European Union, Brussels, 2018. <https://doi.org/10.2766/3596>

⁴⁵ Publications Office of the European Union, *Glossary: European Union...*, cit.

⁴⁶ *Consolidated Versions of the Treaty on European Union and the Treaty on the Functioning of the European Union*, "Official Journal of the European Union", C/83/01, 2010. Available on the EUR-Lex website of the European Union: https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.C_2010.083.01.0001.01.ENG [last accessed 30 June 2026].

⁴⁷ Publications Office of the European Union, *Division of competences within the European Union*. Publications Office of the European Union, 24 February 2022. <https://eur-lex.europa.eu/EN/legal-content/summary/division-of-competences-within-the-european-union.html> [last accessed 30 June 2026].

⁴⁸ Alexiadou, N., Fink-Hafner, D., Lange, B., *Education Policy Convergence...*, cit. Brøgger, K., *The rule of mimetic...*, cit.

⁴⁹ European Commission, Directorate-General for Education, Youth, Sport and Culture. *Erasmus+ 2021-2027: Enriching lives, opening minds through the EU programme for education, training, youth and sport*. Publications Office of the European Union, Brussels, 2021. <https://data.europa.eu/doi/10.2766/536>.

⁵⁰ European Commission. Directorate General for Research and Innovation, *Horizon Europe, the EU research and innovation programme (2021-27): For a green, healthy, digital and inclusive Europe*, Publications Office of the European Union, Brussels, 2021. <https://data.europa.eu/doi/10.2777/052084>

⁵¹ Batory, A., Lindstrom, N., *The Power of the Purse: Supranational Entrepreneurship, Financial Incentives, and European Higher Education Policy*, "Governance", Vol. 24, no. 2, 2011, pp. 311-329. <https://doi.org/10.1111/j.1468-0491.2011.01525.x>.

Table 1 - Comparison between EHEA and EU

	EHEA	EU
Legal status	Voluntary intergovernmental initiative.	Formal supranational organisation grounded in EU Treaties.
Membership	49 participating countries (47 full members after 2022 suspensions of Russia and Belarus); includes non-EU states.	27 EU member states.
Scope	Higher education.	Broader policy agenda.
Competence on higher education	Consensus-based coordination.	Supportive competence.
Implementation mechanisms	OMC: peer learning, peer pressure, voluntary benchmarks.	OMC; legally binding directives in adjacent policy areas; competitive funding programmes.
Key Drivers	Communiqués; BFUG, Working Groups; Bologna Implementation Coordination Group.	Strategies and Council Recommendations; funding programmes (Erasmus+, Horizon Europe) and flagship initiatives (EUI; European degree; Student Card).
Resources / leverage	No direct funding; relies on reputational and coordination effects.	Substantial funding capacity through EU programmes; can steer institutional priorities via calls and eligibility.
Relationship to each other	European Commission is a full EHEA member; EHEA provides normative backbone for EU initiatives.	EU builds on EHEA's transformative initiatives; EU strategy explicitly acknowledges EHEA co-primary role.

Source: developed by the author

3. European Dimension and Europeanisation in Higher Education

Through the combined contributions of the EHEA and the EU, European higher education has increasingly developed as a distinct entity within the global landscape⁵². Its key institutions (i.e. supranational bodies, nation-states, and HEIs) have reinterpreted and responded to broader phenomena such as globalisation⁵³, internationalisation⁵⁴, transnationalism⁵⁵, and regionalisation⁵⁶ through a specifically European lens. These phenomena are exemplified by initiatives such as the ERASMUS

⁵² de Wit, H., Altbach, P. G., *Internationalization in higher education...*, cit. Gornitzka, Å., *Bologna in Context: A horizontal perspective on the dynamics of governance sites for a Europe of Knowledge*, "European Journal of Education", Vol. 45, no. 4, 2010, pp. 535-548. <https://doi.org/10.1111/j.1465-3435.2010.01452.x>. Huisman, J., Adelman, C., Hsieh, C-C., Shams, F., et al., *Europe's Bologna Process and Its Impact on Global Higher Education*, in Deardorff, D., de Wit, H., Heyl, J., et al., *The SAGE Handbook of International Higher Education*, SAGE, New York, 2012, pp. 81-100, <https://doi.org/10.4135/9781452218397.n5>. Maassen, P., Musselin, C., *European Integration and the Europeanisation of Higher Education*, in Amaral, A., Neave, G., Musselin, C., et al., (eds), *European Integration and the Governance of Higher Education and Research*, Springer Netherlands., Dordrecht, 2009, pp. 3-14. https://doi.org/10.1007/978-1-4020-9505-4_1. Neave, G., *The European Dimension...*, cit.

⁵³ de Wit, H., *Globalization and Internationalisation of Higher Education*, "RUSC. Universities and Knowledge Society Journal", n. 8(2), 2011, p. 77. <https://doi.org/10.7238/rusc.v8i2.1247>; Knight, J., *Higher Education in Turmoil The Changing World of Internationalization*, BRILL, Leiden, 2008.

⁵⁴ de Wit, H., Hunter, f., et al., *Internationalisation of higher education*, European Parliament, Brussels, 2015. <https://doi.org/10.2861/444393>.

⁵⁵ Wilkins, S., Huisman, J., *Transnational Education Redefined*, "International Higher Education", no. 121, 2024, <https://doi.org/10.6017/895b9e0d.4bf74947>

⁵⁶ Chou, M.-H., Huisman, J., Lorenzo, M. P., *Regional cooperation in higher education...*, cit.

mobility programme⁵⁷, European quality assurance⁵⁸, the recognition of qualifications⁵⁹, and the EUI⁶⁰. Europe is not merely a space where higher education processes unfold, but rather a context in which they intertwine with the set of formal and informal regulations, norms, and practices⁶¹ promoted and sustained by subnational, national and supranational entities.

Higher education in Europe has consequently developed a European dimension. The European Commission recently identified the European dimension as a strategic goal linked to transnational cooperation among HEIs⁶², vaguely defining it as «built on shared values»⁶³, and a «European approach»⁶⁴. For analytical purposes, a more precise definition is needed. Drawing on European studies⁶⁵, the European dimension is here understood as the set of formal and informal regulations, procedures, policy paradigms, daily practices, shared beliefs and norms that are first defined and consolidated by the EHEA and the EU and then incorporated into national policies and into HEIs.

The European dimension must be distinguished from Europeanisation. While the former embodies the substance of the «European approach»⁶⁷, the latter describes the process through which those characteristics are disseminated and embedded in national systems and institutional practices. Europeanisation, in Radaelli's⁶⁸ terms, captures the processes of construction, diffusion and institutionalisation, while the European dimension is what is being constructed, diffused and institutionalised.

In this analysis, the differentiation informs the analysis in two ways. First, each policy domain is analysed as a component of the European dimension (i.e., norms, shared beliefs, and instruments that constitute a European dimension in that domain). Second, the analysis explicitly traces mechanisms of Europeanisation: construction, diffusion, and institutionalisation. This operationalisation makes it possible to clarify analytically what is meant by the EHEA's approach as distinct from EU action. Distinctiveness is not a claim of complete separation of goals, but of meanings, modes and leverage used to reach those goals. The analysis therefore treats overlap and synergy as expected outcomes of co-primary governance rather than as evidence against differentiation.

⁵⁷ European Commission, Directorate-General for Education, Youth, Sport and Culture, Erasmus+ 2021-2027..., cit.

⁵⁸ Gornitzka, Å., Stensaker, B., *The dynamics of European...*, cit.

⁵⁹ Yung-Chi Hou, A., Morse, R., Wang, W., *Recognition of academic qualifications in transnational higher education and challenges for recognizing a joint degree in Europe and Asia*. "Studies in Higher Education", Vol. 42, no. 7, 2017, pp. 1211-1228. <https://doi.org/10.1080/03075079.2015.1085010>.

⁶⁰ Felder-Stindt, A., Vukasovic, M., *Who you gonna call ... when developing a flagship initiative in an area of limited EU competence? A resource exchange perspective on the development of the European Universities Initiative (EUI)*. "Journal of European Integration", Vol. 48, no. 3, 2025, pp. 1-24. <https://doi.org/10.1080/07036337.2025.2498739>.

⁶¹ Radaelli, C. M., *Europeanisation: Solution or problem?*, "European Integration Online Papers (EIoP)", Vol. 8, no.16, 2004, pp. 1-23. <http://eiop.or.at/eiop/texte/2004-016a.htm>.

⁶² European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

⁶³ *Ivi*, p.3.

⁶⁴ *Ivi*, p.4.

⁶⁵ Börzel, T. A., *Why noncompliance: The politics of law in the European Union*, Cornell University Press, Ithaca, 2021. <https://doi.org/10.7298/jes0-sz72>. Börzel, T. A., Panke, D., 8. Europeanization, in Cini, M., Borragán, N. P-S., *European Union Politics*, Oxford University Press, Oxford, 2022, pp. 112-123. <https://doi.org/10.1093/hepl/9780198862239.003.0008>. Radaelli, C. M., *Europeanisation: Solution or problem?*..., cit.

⁶⁶ *Ibid*.

⁶⁷ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

⁶⁸ Radaelli, C. M., *Europeanisation: Solution or problem?*..., cit.

4. Methodology

To understand the contribution of the EHEA to the European dimension, this article is structured as a policy analysis employing a descriptive method⁶⁹, organising the information into themes while using a limited analytical framework. This choice was made to provide a clearer overview of the EHEA's approach to fostering the European dimension. The policies examined are the publicly available *Communiqués* and their annexes, since they embody the set of norms, shared beliefs, and instruments⁷⁰, that shape the European dimension in the EHEA. More specifically, the contents of the most recent *Communiqué*, the *Tirana communiqué*⁷¹ will be the main object of the study, thereby enhancing the timeliness and relevance of the study for contemporary researchers and policymakers. Nevertheless, the *Bologna Declaration*⁷² and the other subsequent *Communiqués* issued since 2001 will be included in the analysis to show the historical development of the European dimension in the EHEA. The analysis proceeds in two steps. First, it frames the policies according to the main policy domains highlighted by the most recent EHEA policies⁷³. Second, for each domain it identifies the elements that constitute the European dimension (i.e. norms, shared beliefs, and instruments) and the Europeanisation mechanisms through which these elements are expected to be realised (i.e. construction, diffusion, and institutionalisation). The analysis ultimately connects EHEA commitments to the EU initiatives to clarify overlaps, divergences, and complementarities.

5. The EHEA Contribution to the European Dimension

The European dimension in the current higher education landscape is presented by the EU as a response to the evolving context shaping higher education, with the aim of enabling more effective transnational cooperation, promoting inclusiveness, responding to threats to academic and democratic values, adapting to changing skills needs, and enhancing the competitiveness of European higher education⁷⁴. Given the limited competences of both the EU and the EHEA, a degree of conceptual ambiguity surrounding the European dimension in current policies is perhaps inevitable. In the EU strategy it appears as «a visible expression of a European approach»⁷⁵ or as a dimension «built on shared values»⁷⁶. Furthermore, neither the EU's *Council recommendation on building bridges*⁷⁷, nor the most recent EHEA's *Communiqué*, the *Tirana Communiqué*⁷⁸, uses the term *European dimension* explicitly.

The ambiguity surrounding, or even the absence of, the concept should not lead to the immediate conclusion that the European dimension is not a genuine priority. On the contrary, the European dimension is a key objective, and it should be identified in the concrete measures advanced by policy.

⁶⁹ Creswell, J. W., Creswell, J. D., *Research design...*, cit.

⁷⁰ Radaelli, C. M., *Europeanisation: Solution or problem?...*, cit.

⁷¹ European Higher Education Area, *Tirana Communiqué*, 29-30 May 2024a, <https://eha.info/Immagini/Tirana-Communique.pdf> [last accessed 30 June 2026].

⁷² European Higher Education Area, *The Bologna Declaration...*, cit.

⁷³ European Higher Education Area, *Tirana Communiqué...*, cit.

⁷⁴ Ibid.

⁷⁵ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

⁷⁶ Ibid.

⁷⁷ Council of the European Union, *Council Recommendation of 5 April 2022...*, cit.

⁷⁸ European Higher Education Area, *Tirana Communiqué...*, cit.

Since it provides concrete means that foster collaboration in European higher education, the EHEA is essential for the European dimension and gives the European dimension significance and means of implementation. These elements take shape in five main policy domains in the EHEA's *Tirana Communiqués*⁷⁹: fundamental values of higher education, mobility, recognition, quality culture, and the social dimension.

5.1 Fundamental Values of Higher Education

The EHEA delineates a set of fundamental values, which are presented as preconditions for achieving all the other objectives in European higher education⁸⁰. The fundamental values are academic freedom, academic integrity, institutional autonomy, participation of students and staff in higher education governance, public responsibility for, and public responsibility of higher education⁸¹. Fundamental values emerged as a response to the threats to academic freedom in the EHEA, and they initially appeared in the *Paris Communiqué*⁸², while an annex to the *Rome Communiqué* later stressed the importance of academic freedom⁸³. In the *Tirana Communiqué*⁸⁴ the fundamental values were foregrounded, thereby recognising the importance of responding to exogenous and endogenous threats to higher education⁸⁵.

The EHEA also created a monitoring framework for these values, the results of which are to be presented at the next Ministerial conference⁸⁶, based on a fit-for-purpose transnational policy tool⁸⁷. This monitoring framework represents a significant step. It transforms the fundamental values from aspirational declarations into verifiable commitments subject to peer scrutiny, thereby constituting an application of the OMC's naming and shaming mechanism. Whether this monitoring will reveal implementation gaps or compliance tensions remains to be seen when the results are published at the next Ministerial Conference.

Nevertheless, fundamental values assign the EHEA a primary role in shaping the European dimension in concrete terms. Through the definitions and associated instruments, they provide precise indications on how to build what Frame and Curylo called an *everyday Europeanhood*⁸⁸, a shared European approach

⁷⁹ Ibid.

⁸⁰ Ibid.

⁸¹ Ibid. European Higher Education Area, *Annex 1 to the Tirana Communiqué—EHEA STATEMENTS ON FUNDAMENTAL VALUES*, 29-30 May 2024b, <https://ehea.info/Immagini/ANNEX-1-EHEA-STATEMENTS-ON-FUNDAMENTAL-VALUES.pdf>. [last accessed 30 June 2026].

⁸² European Higher Education Area, *Paris Communiqué*, 25 May 2018, https://ehea.info/media.ehea.info/file/2018_Paris/77/1/EHEAParis2018_Communique_final_952771.pdf [last accessed 30 June 2026].

⁸³ European Higher Education Area, *Rome Ministerial Communiqué*, 19 November 2020, https://www.ehea.info/Upload/Rome_Ministerial_Communique.pdf. [last accessed 30 June 2026].

⁸⁴ European Higher Education Area, *Tirana Communiqué...*, cit.

⁸⁵ Marini, G., Oleksiyenko, A., *Academic freedom in the re-imagined post-Humboldtian Europe*, "Higher Education Quarterly", Vol. 76, no. 3, 2022, pp. 513-520. <https://doi.org/10.1111/hequ.12405>. Oleksiyenko, A., *Is academic freedom feasible in the post-Soviet space of higher education?*, "Educational Philosophy and Theory", Vol. 53, no. 11, 2021, pp. 1116-1126. <https://doi.org/10.1080/00131857.2020.1773799>. Oleksiyenko, A., Jackson, L., *Freedom of speech, freedom to teach, freedom to learn: The crisis of higher education in the post-truth era*, "Educational Philosophy and Theory", Vol. 53, no. 11, pp. 1057-1062. <https://doi.org/10.1080/00131857.2020.1773800>.

⁸⁶ European Higher Education Area, *Tirana Communiqué...*, cit.

⁸⁷ Matei, L., Crăciun, D., Potapova, E., *The Emergence and Design of a Transnational Policy Tool: Monitoring the Fundamental Values of Higher Education in the European Higher Education Area*, in Curaj, A., Hâj, C. M., Pricopie, R., (eds), *European Higher Education Area 2030: Bridging Realities for Tomorrow's Higher Education*, Springer, Cham, 2025, pp. 43-449. https://doi.org/10.1007/978-3-031-75140-0_23.

⁸⁸ Frame, A., Curylo, B., *Bringing Erasmus home: The European universities initiative as an example of 'Everyday Europeanhood'*, "Journal of Contemporary European Studies", Vol. 32, no. 2, 2024, pp.334-349. <https://doi.org/10.1080/14782804.2022.2134986>.

enabled by policies and reinforced through the everyday practices of EHEA members and their HEIs. The values directly connect with the EU's objective of making HEIs a «lighthouse for a European way of life»⁸⁹, thereby giving this expression further substantive meaning, and providing a normative basis for transnational cooperation that extends beyond the EU and encompasses all 47 EHEA members.

5.2 Mobility

Fundamental values provide a baseline for cooperation among HEIs and, consequently, for mobility between the EHEA member countries. EHEA members commit to realising «seamless mobility of students and staff»⁹⁰, whether physical, virtual, or blended⁹¹ with the goal of achieving at least 20% of mobile students among EHEA's member countries⁹². What is peculiar about this domain, however, is not the target itself but the way in which its flagship instruments circulate between the EHEA and the EU. The EHEA provides structural instruments to reach this goal through close cooperation with the EU, with tools stemming from each actor and reinforcing the other's initiatives.

One of the most remarkable tools is the European Credit Transfer and Accumulation System (ECTS), which creates a common system of reference for mobile learners and HEIs, based on defined learning outcomes and their associated workload⁹³. The ECTS did not originate within the EHEA; it was initially used for the implementation of the EU's ERASMUS programme⁹⁴. It was then adopted gradually through the *Communiqués*⁹⁵ as the reference system for the quantification of study workload and outcomes, culminating in the ECTS Users' Guide published in 2015⁹⁶. This development trajectory exemplifies how an idea from the EU can achieve its complete realisation through the EHEA, and underscores the close and collaborative dynamic between the EHEA and the EU, which often intertwine⁹⁷. Ideas from one actor can find their complete institutional realisation in the other, building a shared European approach to collaboration⁹⁸ and thus strengthening the European dimension.

The reverse dynamic, from the EHEA to the EU, can be observed in relation to the Qualification Framework of the EHEA⁹⁹, which delineated the three-cycle degree system (i.e. bachelor, master, and

⁸⁹ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

⁹⁰ European Higher Education Area, *Tirana Communiqué...*, cit.

⁹¹ Ibid.

⁹² Ibid.

⁹³ European Commission. Directorate General for Education and Culture, *ECTS users' guide 2015*, Publications Office of the European Union, Brussels, 2015. <https://doi.org/10.2766/87192>.

⁹⁴ European Economic Communities, (1987). Council Decision of 15 June 1987 Adopting the European Community Action Scheme for the Mobility of University Students (ERASMUS), available at Official Journal website, pp. 20-24. 1994. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31987D0327>. [last accessed 30 June 2026].

⁹⁵ European Higher Education Area, *The Bologna Declaration...*, cit. European Higher Education Area, *TOWARDS THE EUROPEAN...*, cit. European Higher Education Area, *London Communiqué Towards the European Higher Education Area: Responding to challenges in a globalised world*, 18 May 2007, http://www.ehea.info/Upload/document/ministerial_declarations/2007_London_Communique_English_588697.pdf. [last accessed 30 June 2026]. European Higher Education Area, *Making the Most of Our Potential: Consolidating the European Higher Education Area: Bucharest Communiqué*, 27 April 2012, http://www.ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf. [last accessed 30 June 2026]. European Higher Education Area, *Yerevan Communiqué*, 15 May 2015, http://www.ehea.info/Upload/document/ministerial_declarations/YerevanCommuniquéFinal_613707.pdf. [last accessed 30 June 2026].

⁹⁶ European Commission. Directorate General for Education and Culture, *ECTS users' guide...*, cit.

⁹⁷ Cino Pagliarello, M., *Ideas and European Education Policy, 1973-2020*, Springer, Cham, 2022. <https://doi.org/10.1007/978-3-030-94094-2>. Corbett, A., *Universities and the Europe of Knowledge*, PALGRAVE MACMILLAN, London, 2005. <https://doi.org/10.1057/9780230286467>.

⁹⁸ European Commission (2022). *COMMUNICATION FROM THE COMMISSION...*, cit.

⁹⁹ European Higher Education Area. *Annex III - Overarching Framework of Qualifications of the European Higher Education Area*. European Higher Education Area, 2018. https://ehea.info/Upload/document/ministerial_declarations/EHEAParis2018_Communique_AppendixIII_952778.pdf.

doctorate) and the more recent short-cycle. This structure became the cornerstone on which the EU built its higher education architecture through the European Qualification Framework¹⁰⁰ and, together with the ECTS, provides the groundwork for synergies across other EU initiatives, such as the EU¹⁰¹ or the joint European degree¹⁰². Despite some persistent shortcomings in national implementation¹⁰³, the Qualification Framework of the EHEA plays a crucial role in standardising higher education qualifications across Europe, promoting mobility, and ensuring the quality and comparability of educational outcomes. Moreover, it sets a benchmark that expands beyond Europe, as declared in the *Global Policy Forum Statement*¹⁰⁴.

Mobility is the domain in which the entanglement between the EHEA and the EU is most visible, since it shows that neither actor completes its instruments alone. Taken together, ECTS and the Qualification Framework do not simply illustrate cooperation between the EHEA and the EU: they show that the European dimension in mobility is constructed through initiatives which origin and completion are distributed between the two entities, rather than residing permanently with either one.

5.3 Recognition

The ECTS and the EHEA Qualification Framework are linked to the policy domain of recognition, which further enables the European dimension by facilitating interoperability between countries and their HEIs, allowing academic qualifications to be compared and recognised between different higher education systems. Recognition has its roots in the European regional recognition convention, namely the Lisbon Recognition Convention¹⁰⁵, which delineated the principles of recognition of academic qualifications in the European area. The EHEA's most operationally significant instrument in this domain is the Diploma Supplement¹⁰⁶, a standardised supplement to the academic qualification. Recognition was further advanced through the *Communiqués*, with the *Bucharest Communiqué* proposing the idea of automatic recognition¹⁰⁷, defined as «the automatic right of an applicant holding a qualification of a certain level to be considered for entry to a programme of further study at the next level in any other EHEA-country (access)»¹⁰⁸. Automatic recognition is now a firm commitment of the EHEA members¹⁰⁹, and it is also supported by the EU¹¹⁰, as a means to facilitate the cross-border collaboration that lies at the core of the European dimension.

¹⁰⁰ Europass, *Description of the eight EQF levels*, 2026. <https://europa.eu/europass/en/description-eight-eqf-levels> [accessed 30 June 2026].

¹⁰¹ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

¹⁰² European Commission, Directorate General for Education, Youth, Sport and Culture, *Blueprint for a European degree: Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions*, Publications Office of the European Union, Brussels, 2024. <https://data.europa.eu/doi/10.2766/496478>.

¹⁰³ European Education and Culture Executive Agency, Eurydice, *The European higher education...*, cit.

¹⁰⁴ European Higher Education Area, *Annex 3 to the Tirana Communiqué—GLOBAL POLICY FORUM STATEMENT*, 29-30 May 2024c. https://erasmusplus.org.ua/wp-content/uploads/2024/05/tirana_global-policy-forum-statement_2_neo_here_en_ua.pdf [last accessed 30 June 2026].

¹⁰⁵ Council of Europe, *Convention on the Recognition of Qualifications Concerning Higher Education in the European Region*, "Treaty Office", no.165, 11 April 1997. <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=165> [last accessed 30 June 2026].

¹⁰⁶ European Commission, *Diploma Supplement*, 18 June 2022. <https://education.ec.europa.eu/education-levels/higher-education/inclusive-and-connected-higher-education/diploma-supplement> [last accessed 30 June 2026].

¹⁰⁷ European Higher Education Area, *Making the Most...*, cit.

¹⁰⁸ European Higher Education Area, *Report by the EHEA Pathfinder Group on Automatic Recognition*, 14-15 May 2015b. http://www.ehea.info/media.ehea.info/file/2015_Yerevan/72/3/EHEA_Pathfinder_Group_on_Automatic_Recognition_January_2015_613723.pdf [last accessed 30 June 2026].

¹⁰⁹ European Higher Education Area, *Tirana Communiqué...*, cit.

¹¹⁰ Council of the European Union, *Council Recommendation of 26 November 2018 on Promoting Automatic Mutual Recognition of Higher Education and Upper Secondary Education and Training Qualifications and the Outcomes of Learning Periods Abroad*, "Official Journal of the European Union", C/444/1, 2018. Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568891859235&uri=CELEX:32018H1210\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568891859235&uri=CELEX:32018H1210(01)) [last accessed 30 June 2026].

Within this policy domain, the ENIC-NARIC network¹¹¹ is analytically relevant because it sustains diffusion and implementation. The ENIC-NARIC centres are nationally-based and support recognition practices by producing guidance (e.g., the EAR Manual) and sharing information and tools that help credential evaluators apply comparable procedures¹¹². Moreover, national databases and networks for automatic recognition exemplify how EHEA commitments can translate into operational tools, sometimes with EU co-funding and third-party implementation¹¹³, underscoring the potential benefits of multi-actor governance¹¹⁴.

Nevertheless, the extent to which such arrangements lead to coherent or fragmented implementation across national contexts remains an important issue for their institutionalisation. Where this peer-based, voluntary infrastructure is strong, automatic recognition functions in practice; where it is weak, the entitlement remains formally declared but substantively unrealised. Recognition thus illustrates, more clearly than any other domain, the trade-off built into the EHEA's voluntary, consensus-based method: it is precisely the absence of legally binding instruments that allows the EHEA to declare a right as ambitious as automatic recognition, and it is the same absence that leaves its institutionalisation uneven across EHEA members.

5.4 Quality Culture

Mobility and recognition are underpinned by a robust quality infrastructure¹¹⁵, constructed through a collaborative approach involving different independent entities and referred to in the Tirana Communiqué as «quality culture»¹¹⁶. More than a merely technical framework, quality culture functions as a mechanism through which the European dimension is embedded in higher education governance and institutional practice. Its most impactful instrument is the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*¹¹⁷, developed by EHEA members and selected consultative members¹¹⁸, adopted in the 2005 *Bergen Communiqué*¹¹⁹, and published in its current form in 2015¹²⁰. The ESG derive much of their influence interpretive flexibility: their openness and deliberate ambiguity¹²¹ facilitated convergence across higher education systems without requiring complete

¹¹¹ ENIC-NARIC Networks, *About the ENIC-NARIC networks*, ENIC-NARIC Networks, 2026. <https://www.enic-naric.net/> [last accessed 30 June 2026].

¹¹² Nuffic, *EAR manual 2023*, 2023. https://www.nuffic.nl/sites/default/files/2023-08/1.%20EAR%20Manual%202023_2nd%20edition.pdf [last accessed 30 June 2026].

¹¹³ Automatic Recognition Database Italia, *ARDI - Automatic Recognition Database Italia*, 2026, <https://ardi.cimea.it/en>. [last accessed 30 June 2026]; Swedish Council for Higher Education, *Qualifications Assessment Tool*, 2026. <https://www.uhr.se/en/start/recognition-of-foreign-qualifications/qualifications-assessment-tool/> [last accessed 30 June 2026]. MAREN, MAREN Project, 2026. <https://marenetwork.info/maren-project/> [last accessed 30 June 2026].

¹¹⁴ Vukasovic, M., Jungblut, J., Chou, M.-H., et al., *Multi-level, Multi-actor and Multi-issue ...*, cit.

¹¹⁵ Grek, S., Russell, I., *Beyond Bologna? Infrastructuring quality in European higher education*, "European Educational Research Journal", Vol. 23, no. 2, 2024, pp. 215- 236. <https://doi.org/10.1177/14749041231170518>.

¹¹⁶ European Higher Education Area, *Tirana Communiqué...*, cit.

¹¹⁷ Bergan, S., *The European Higher Education...*, cit.

¹¹⁸ European Association for Quality Assurance in Higher Education, European Students' Union, European University Association, European Association of Institutions in Higher Education, *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, 2015. https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf [accessed 30 June 2026].

¹¹⁹ European Higher Education Area, *The European Higher Education Area—Achieving the Goals Communiqué of the Conference of European Ministers Responsible for Higher Education*, 20 May 2005. http://www.ehea.info/Upload/document/ministerial_declarations/2005_Bergen_Communique_english_580520.pdf [last accessed 30 June 2026].

¹²⁰ European Association for Quality Assurance in Higher Education, European Students' Union, European University Association, European Association of Institutions in Higher Education, *Standards and Guidelines...*, cit.

¹²¹ Brøgger, K., Madsen, M., *An affirmative-diffractive re-reading of the policy instrumentation approach through agential realism and the accreditation instrument*, "Journal of Education Policy", Vol. 37, no. 6, 2022, pp. 925-943. <https://doi.org/10.1080/02680939.2021.1938239>. Gornitzka, Å., Stensaker, B. *The dynamics of European...*, cit.

procedural uniformity¹²². The trade-off is a risk of inconsistency in how quality assurance has been implemented across national contexts. Even so, the ESG have been central to the construction of a European quality infrastructure extending both within and beyond the EHEA¹²³. Their implementation might be seen as one of the main reasons for the use of the term quality culture, which shows how the European dimension not only takes the form of practical instruments but also leads to a transformative change with a long-term impact on daily practices.

The ESG have also enabled the development of an environment in which the European dimension is operationalised through a set of interconnected initiatives. The European Quality Assurance Register for Higher Education (EQAR), established in 2007 in connection with the *London Communiqué*¹²⁴ and co-funded by the EU¹²⁵, is particularly significant because it provides a supranational register of quality assurance agencies that apply the ESG in the evaluation of HEIs, programmes, and courses. In doing so, EQAR strengthens transparency, supports mutual trust, and reduces the informational asymmetries that might otherwise hinder cross-border cooperation. Furthermore, the ESG informed the development of the *European Approach for Quality Assurance of Joint Programmes*, which established a common framework for the quality assurance of inter-institutional programmes. This is analytically important because it illustrates how broad guidelines can be translated into specific instruments capable of facilitating institutional cooperation across national legislation.

Taken together, these initiatives have created a quality environment conducive to the consolidation of the European dimension. In this context, quality culture gives practical and institutional expression to what might otherwise remain an abstract aspiration, as it translates shared European objectives into concrete norms, procedures, and evaluative expectations. The effects of this quality infrastructure extend beyond individual states and HEIs and directly shape the conditions under which broader European policy initiatives can emerge. Indeed, pivotal EU initiatives such as EUI¹²⁶ and the European degree¹²⁷ depend to a considerable extent on the pre-existing quality infrastructure developed within the EHEA¹²⁸. The significance of this infrastructure therefore lies not only in its regulatory function, but also in its constitutive role in making deeper forms of the European dimension in higher education both credible and operationally feasible.

5.5 Social Dimension

If fundamental values establish the EHEA's normative claims, the social dimension is where those claims are tested against lived reality. The social dimension links the EHEA to all other policy domains, particularly fundamental values, and to the EU's broader objective of positioning European higher education as a vehicle for realising «a European way of life»¹²⁹. Specifically, the EHEA promotes equality, inclusion, and accessibility as core principles of higher education¹³⁰. In 2020, it articulated a set of principles intended

¹²² Bergan, S., *The European Higher Education Area...*, cit.

¹²³ Grek, S., Russell, I., *Beyond Bologna? Infrastructuring...*, cit.

¹²⁴ European Higher Education Area, *Towards the European...*, cit.

¹²⁵ European Quality Assurance Register for Higher Education (EQAR), *Essential info*, 2026. <https://www.eqar.eu/qa-results/find-out-more/essential-info/> [last accessed 30 June 2026].

¹²⁶ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

¹²⁷ European Commission, Directorate General for Education, Youth, Sport and Culture, *Blueprint for a European...*, cit.

¹²⁸ Grek, S., Russell, I., *Beyond Bologna? Infrastructuring...*, cit.

¹²⁹ European Commission, *COMMUNICATION FROM THE COMMISSION...*, cit.

¹³⁰ European Higher Education Area, *Rome Ministerial Communiqué...*, cit. European Higher Education Area, *Tirana Communiqué...*, cit.

to guide implementation within the strategies of national higher education systems and HEIs¹³¹, and these were subsequently reaffirmed in the *Tirana Communiqué*¹³², with greater emphasis placed on student well-being, access, and equality. The social dimension therefore reflects the EHEA's attempt to respond to global challenges affecting higher education by addressing structural barriers to student participation and success¹³³.

The prominence given to students as the principal beneficiaries of the social dimension is analytically significant because it illustrates a unique feature of the EHEA's approach to Europeanisation. The European dimension operates not only at the national and organisational levels but also at the level of individual experience and participation. By addressing global challenges such as accessibility, the EHEA positions individuals as both beneficiaries and agents of what Frame and Curyło define as everyday Europeanhood¹³⁴, that is, a lived expression of the European dimension. In this respect, the social dimension contributes not merely to policy coordination, but also to the cultivation of student cohesion across the EHEA by fostering a space grounded in shared values and beliefs. The European dimension, through the social dimension of the EHEA, thus extends to the everyday lived realities of its individual members.

Nevertheless, the social dimension also reveals some of the most persistent implementation challenges within the EHEA. The gap between the aspirational commitments enshrined in the *Communiqués* and measurable progress on equity and inclusion is documented in Bologna implementation reports¹³⁵. The EHEA's reliance on the OMC, without financial leverage, means that addressing deep structural inequalities in access and participation depends on the political will and financial capacity of individual members, which varies considerably. Consequently, the social dimension potentially risks being overwhelmed by other priorities driven mostly by a neoliberal approach¹³⁶.

6. Conclusions

This analysis demonstrates that the EHEA is not a complementary actor to the EU, but a co-primary architect of the European dimension of higher education, providing its normative and institutional backbone across five interlocking policy domains: fundamental values, mobility, recognition, quality culture, and the social dimension. This role rests on an approach distinct from that of the EU in three specific ways: a voluntary and consensus-based method, as opposed to the EU's funding leverage and, in adjacent areas, legally binding instruments; an exclusive focus on higher education, as opposed to the EU's broader policy agenda; and a primacy in establishing the structural instruments, qualification frameworks, quality assurance standards, recognition tools, on which subsequent EU initiatives have been built. Across all five domains, the same Europeanisation logic recurs: the *Communiqués* construct

¹³¹ European Higher Education Area, *Rome Ministerial Communiqué...*, cit.

¹³² European Higher Education Area, *Tirana Communiqué...*, cit.

¹³³ Ibid.

¹³⁴ Frame, A., Curyło, B., *Bringing Erasmus home...*, cit.

¹³⁵ European Education and Culture Executive Agency. Eurydice, *The European higher education...*, cit.

¹³⁶ Bamberger, A., Morris, P., Yemini, M., *Neoliberalism, internationalisation and higher education: Connections, contradictions and alternatives*. "Discourse: Studies in the Cultural Politics of Education", Vol. 40, no. 2, 2019, pp. 203-216. <https://doi.org/10.1080/01596306.2019.1569879>

normative indications and instruments, the OMC diffuses them through peer learning and peer pressure, and EHEA governance, together with national authorities and HEIs, institutionalises them in everyday practice.

This pattern of mutual borrowing (i.e. the EHEA originating the Qualification Framework later absorbed into the EU's own framework, the EU's ECTS being fully institutionalised only through the *Communiqués*, and third actors such as ENIC-NARIC sustaining implementation across both) does not undermine the EHEA's distinctiveness. On the contrary, it is precisely this capacity to generate the instruments on which EU initiatives subsequently rely that substantiates the claim of a co-primary, rather than merely complementary, role. By systematically disentangling these dynamics across policy domains, rather than treating the European dimension as an EU-centred or undifferentiated process, this article extends the literature on Europeanisation and governance in the EHEA with an analytical systematic account of how, and through which mechanisms, the European dimension is specifically advanced by the EHEA.

These findings carry three implications for European higher education governance. First, the EHEA's co-primary role challenges the common assumption that the EU is the principal architect of the European dimension. Recognising the EHEA as a normative backbone, rather than a complementary structure, should inform how future EU-EHEA collaboration is designed. The risk of duplication, however, is real: if the EU's flagship initiatives (i.e. the EUI, the European degree) proceed without adequate alignment with the EHEA's pre-existing instruments, they may fragment rather than reinforce the European dimension. Proactive coordination at the policy design stage, rather than retrospective alignment, is therefore advisable.

Second, the legitimacy of European higher education governance partly derives from the EHEA's inclusive and voluntary architecture, through which 47 members, including non-EU states, commit to shared norms without legal compulsion. This legitimacy would be weakened if EU initiatives were perceived as circumventing or replacing EHEA-developed standards, particularly by non-EU members who lack a voice in EU policy processes; future governance arrangements should remain attentive to this dimension.

Third, the analysis reveals a persistent tension between the EHEA's normative ambition and its implementation capacity, most visibly in the social dimension, where structural inequalities in access and participation persist despite long-standing commitments. Because the EHEA depends on the OMC without financial leverage, addressing this tension may require either stronger financial coordination mechanisms or more targeted peer-support arrangements within the BFUG.

This analysis has examined the EHEA's contribution to the European dimension as it emerges from its own programmatic documents, hence more extensions would deepen this account. Future research could examine whether the European dimension promoted by the EHEA and that advanced by the EU constitute the same evolving concept, or whether the two are progressively diverging in specific cases. It would also be valuable to trace how the EHEA's Europeanisation mechanisms operate within EU-led initiatives themselves, such as the EUI alliances, where EHEA-derived instruments and EU funding intersect most directly. Finally, the EUI and HEIs might be studied from an institutional perspective to examine how the European dimension could be shaped from the bottom through new logics, dynamics

and initiatives. What this analysis suggests, in any case, is that any account of the European dimension that overlooks the EHEA's normative and institutional role risks mistaking a co-primary architect for a secondary one.

Bibliography

Adonnino, P., *A People's Europe: Reports from the ad hoc Committee*, Comité ad hoc 'Europe des citoyens', 29 June 1985. <https://www.ombudsman.europa.eu/en/historical/en/4659>. [last accessed 30 June 2026].

Alexiadou, N., Fink-Hafner, D., Lange, B., *Policy Convergence through the Open Method of Coordination: Theoretical Reflections and Implementation in 'old' and 'new' National Contexts*, "European Educational Research Journal", Vol. 9, no. 3, 2010, pp. 345-358. <https://doi.org/10.2304/eerj.2010.9.3.345>.

Automatic Recognition Database Italia, ARDI - *Automatic Recognition Database Italia*, 2026. <https://ardi.cimea.it/en>. [last accessed 30 June 2026].

Bamberger, A., Morris, P., Yemini, M., *Neoliberalism, internationalisation and higher education: Connections, contradictions and alternatives*. "Discourse: Studies in the Cultural Politics of Education", Vol. 40, no. 2, 2019, pp. 203-216. <https://doi.org/10.1080/01596306.2019.1569879>.

Batory, A., Lindstrom, N., *The Power of the Purse: Supranational Entrepreneurship, Financial Incentives, and European Higher Education Policy*, "Governance", Vol. 24, no. 2, 2011, pp. 311-329. <https://doi.org/10.1111/j.1468-0491.2011.01525.x>.

Bergan, S., *The European Higher Education Area: A road to the future or at way's end?*, "Tuning Journal for Higher Education", Vol. 6, no. 2, 2019, pp. 23-49. [https://doi.org/10.18543/tjhe-6\(2\)-2019pp23-49](https://doi.org/10.18543/tjhe-6(2)-2019pp23-49).

Börzel, T. A., *Why noncompliance: The politics of law in the European Union*, Cornell University Press, Ithaca, 2021. <https://doi.org/10.7298/jes0-sz72>.

Börzel, T. A., Panke, D., 8. Europeanization, in Cini, M., Borragán, N. P-S., *European Union Politics*, Oxford University Press, Oxford, 2022, pp. 112-123. <https://doi.org/10.1093/hepl/9780198862239.003.0008>.

Brøgger, K., *The rule of mimetic desire in higher education: Governing through naming, shaming and faming*, "British Journal of Sociology of Education", Vol. 37, no. 1, 2016, pp. 72-91. <https://doi.org/10.1080/01425692.2015.1096191>.

Brøgger, K., Madsen, M., *An affirmative-diffractive re-reading of the policy instrumentation approach through agential realism and the accreditation instrument*, "Journal of Education Policy", Vol. 37, no. 6, 2022, pp. 925-943. <https://doi.org/10.1080/02680939.2021.1938239>.

Brooks, R., Rensimer, L., *The European Universities Initiative and European spatial imaginaries*. "Globalisation, Societies and Education", Vol. 23, no. 3, 2023, pp. 752-765. <https://doi.org/10.1080/14767724.2023.2210515>.

Chou, M-H., Huisman, J., Lorenzo, M. P., *Regional cooperation in higher education*, in Lombaerde, P.D., (ed.), *Handbook of Regional Cooperation and Integration*, Edward Elgar Publishing, Northampton, 2024, pp. 266-288. <https://doi.org/10.4337/9781800373747.00020>.

Cino Pagliarello, M., *Ideas and European Education Policy, 1973-2020*, Springer, Cham, 2022. <https://doi.org/10.1007/978-3-030-94094-2>.

Corbett, A., *Universities and the Europe of Knowledge*, Palgrave Macmillan, London, 2005. <https://doi.org/10.1057/9780230286467>.

Council of Europe, *European Cultural Convention*, "European Treaty Seriesno", no, 18, 19 December 1954. <https://rm.coe.int/168006457e> [last accessed 30 June 2026].

Council of Europe, *Convention on the Recognition of Qualifications Concerning Higher Education in the European Region*, "Treaty Office", no.165, 11 April 1997. <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=165> [last accessed 30 June 2026].

Council of the European Communities, *On Measures for Developing the European Dimension in Higher Education*, "Official Journal of the European Union", C/336/27, 1992. Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:41992X1219\(02\)&qid=1769782636724](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:41992X1219(02)&qid=1769782636724). [last accessed 30 June 2026].

Council of the European Union, *Council Recommendation of 26 November 2018 on Promoting Automatic Mutual Recognition of Higher Education and Upper Secondary Education and Training Qualifications and the Outcomes of Learning Periods Abroad*, "Official Journal of the European Union", C/444/1, 2018. Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568891859235&uri=CELEX:32018H1210\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568891859235&uri=CELEX:32018H1210(01)) [last accessed 30 June 2026].

Council of the European Union, *Council Recommendation of 5 April 2022 on Building Bridges for Effective European Higher Education Cooperation (Text with EEA Relevance)*, "Official Journal of the European Union", C/160/01, 2022. Available on the EUR-Lex website of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0413\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0413(01)&from=EN). [last accessed 30 June 2026].

Crăciun, D., *National Policies for Higher Education Internationalization: A Global Comparative Perspective*, in Curaj, A., Deca, L., Procopie, R., (eds), *European Higher Education Area: The Impact of Past and Future Policies*, Springer, Cham, 2018, pp. 95-106. https://doi.org/10.1007/978-3-319-77407-7_7.

Crăciun, D., *Systematizing national higher education internationalization strategies: Reconceptualizing a process*, PhD Thesis, Central European University, 2019. <https://www.ceeol.com/search/article-detail?id=440904> [last accessed 30 June 2026].

Creswell, J. W., Creswell, J. D., *Research design: Qualitative, quantitative, and mixed methods approaches*, SAGE, Thousands Oaks, 2023.

De Boer, H. F., Huisman, J., *Governance Trends in European Higher Education*. in Capano, G., Jarvis, D. S. L., (eds), *Convergence and Diversity in the Governance of Higher Education*, Cambridge University Press, Cambridge, 2020, pp. 333-354. <https://doi.org/10.1017/9781108669429.013>.

de Wit, H., Hunter, F., et al., *Internationalisation of higher education*, European Parliament, Brussels, 2015, <https://doi.org/10.2861/444393>.

de Wit, H., *Globalization and Internationalisation of Higher Education*, "RUSC. Universities and Knowledge Society Journal", Vol. 8, no. 2, 2011, p. 77. <https://doi.org/10.7238/rusc.v8i2.1247>.

de Wit, H., Altbach, P. G., *Internationalization in higher education: Global trends and recommendations for its future*. "Policy Reviews in Higher Education", Vol. 5, no.1, 2021, pp. 28-46. <https://doi.org/10.1080/23322969.2020.1820898>.

Elken, M., Vukasovic, M., *Dynamics of voluntary coordination: Actors and networks in the Bologna Process*, in Chou, M.H., Gornitzka, Å., (eds), *Building the Knowledge Economy in Europe*. Edward Elgar Publishing, Northampton, 2014, pp.131-159. <https://doi.org/10.4337/9781782545293.00011>.

Enders, J., *Higher education, internationalisation, and the nation-state: Recent developments and challenges to governance theory*. "Higher Education", Vol. 47, 2004, pp. 361-382. <https://doi.org/10.1023/B:HIG.0000016461.98676.30>.

ENIC-NARIC Networks, *About the ENIC-NARIC networks*, ENIC-NARIC Networks, 2026, <https://www.enic-naric.net/> [last accessed 30 June 2026].

Europass, *Description of the eight EQF levels*, 2026. <https://europa.eu/europass/en/description-eight-eqf-levels> [accessed 30 June 2026].

European Association for Quality Assurance in Higher Education, European Students' Union, European University Association, European Association of Institutions in Higher Education, *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, 2015. https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf [last accessed 30 June 2026].

European Commission, *Diploma Supplement*, 18 June 2022, <https://education.ec.europa.eu/education-levels/higher-education/inclusive-and-connected-higher-education/diploma-supplement> [last accessed 30 June 2026].

European Commission, *COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS on a European Strategy for Universities*, no. 16, 18 January 2022. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52022DC0016> [last accessed 30 June 2026].

European Commission. Directorate General for Education and Culture, *ECTS users' guide 2015*, Publications Office of the European Union, Brussels, 2015. <https://doi.org/10.2766/87192>.

European Commission. Directorate General for Education, Youth, Sport and Culture, *The EU in support of the Bologna process*, Publications Office of the European Union, Brussels, 2018. <https://doi.org/10.2766/3596>.

European Commission. Directorate General for Education, Youth, Sport and Culture, *Blueprint for a European degree: Communication from the Commission to the European Parliament, the Council, the European Economic and Social committee and the Committee of the Regions*, Publications Office of the European Union, Brussels, 2024. <https://data.europa.eu/doi/10.2766/496478>.

European Commission. Directorate General for Research and Innovation, *Horizon Europe, the EU research and innovation programme (2021-27): For a green, healthy, digital and inclusive Europe*, Publications Office of the European Union, Brussels, 2021. <https://data.europa.eu/doi/10.2777/052084>.

European Commission, Directorate-General for Education, Youth, Sport and Culture. *Erasmus+ 2021-2027: Enriching lives, opening minds through the EU programme for education, training, youth and sport*. Publications Office of the European Union, Brussels, 2021. <https://data.europa.eu/doi/10.2766/536> [last accessed 30 June 2026].

European Economic Communities, (1987). *Council Decision of 15 June 1987 Adopting the European Community Action Scheme for the Mobility of University Students (ERASMUS)*, available at Official Journal website, pp. 20-24, 1994. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31987D0327> [last accessed 30 June 2026].

European Education and Culture Executive Agency. *Eurydice, The European higher education area in 2024: Bologna process implementation report*, Publications Office of the European Union, Brussels, 2024. <https://doi.org/10.2797/351309>.

European Higher Education Area, *Sorbonne Joint Declaration: Joint declaration on harmonisation of the architecture of the European higher education system*, 25 May 1998. http://www.ehea.info/media.ehea.info/file/1998_Sorbonne/61/2/1998_Sorbonne_Declaration_English_552612.pdf [last accessed 30 June 2026].

European Higher Education Area, *The Bologna Declaration of 19 June 1999: Joint declaration of the European Ministers of Education*, 19 June 1999. http://www.ehea.info/Upload/document/ministerial_declarations/1999_Bologna_Declaration_English_553028.pdf [last accessed 30 June 2026].

European Higher Education Area, *Towards the European Higher Education Area; Communiqué of the meeting of European Ministers in charge of Higher Education in Prague on May 19th 2001*, 19 May 2001. http://www.ehea.info/Upload/document/ministerial_declarations/2001_Prague_Communique_English_553442.pdf. [last accessed 30 June 2026].

European Higher Education Area, *Realising the European Higher Education Area, Communiqué of the Conference of Ministers responsible for Higher Education in Berlin on 19 September 2003*, 19 September 2003. https://ehea.info/Upload/document/ministerial_declarations/2003_Berlin_Communique_English_577284.pdf [last accessed 30 June 2026].

European Higher Education Area, *The European Higher Education Area—Achieving the Goals Communiqué of the Conference of European Ministers Responsible for Higher Education*, 20 May 2005. http://www.ehea.info/Upload/document/ministerial_declarations/2005_Bergen_Communique_english_580520.pdf [last accessed 30 June 2026].

European Higher Education Area, *London Communiqué Towards the European Higher Education Area: Responding to challenges in a globalised world*, 18 May 2007. http://www.ehea.info/Upload/document/ministerial_declarations/2007_London_Communique_English_588697.pdf [last accessed 30 June 2026].

European Higher Education Area, *Budapest-Vienna Declaration on the European Higher Education Area*, 12 March 2010. http://www.ehea.info/Upload/document/ministerial_declarations/Budapest_Vienna_Declaration_598640.pdf [last accessed 30 June 2026].

European Higher Education Area, *Making the Most of Our Potential: Consolidating the European Higher Education Area: Bucharest Communiqué*, 27 April 2012. http://www.ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf.

European Higher Education Area, *Yerevan Communiqué*, 15 May 2015. http://www.ehea.info/Upload/document/ministerial_declarations/YerevanCommuniqueFinal_613707.pdf [last accessed 30 June 2026].

European Higher Education Area, *Report by the EHEA Pathfinder Group on Automatic Recognition*, 14-15 May 2015b. http://www.ehea.info/media.ehea.info/file/2015_Yerevan/72/3/EHEA_Pathfinder_Group_on_Automatic_Recognition_January_2015_613723.pdf [last accessed 30 June 2026].

European Higher Education Area, *Paris Communiqué*, 25 May 2018. https://ehea.info/media.ehea.info/file/2018_Paris/77/1/EHEAParis2018_Communique_final_952771.pdf [last accessed 30 June 2026].

European Higher Education Area, *Rome Ministerial Communiqué*, 19 November 2020a, https://www.ehea.info/Upload/Rome_Ministerial_Communique.pdf [last accessed 30 June 2026].

European Higher Education Area, *Tirana Communiqué*, 29-30 May 2024a, <https://ehea.info/Immagini/Tirana-Communique.pdf> [last accessed 30 June 2026].

European Higher Education Area, *Annex 1 to the Tirana Communiqué—EHEA STATEMENTS ON FUNDAMENTAL VALUES*, 29-30 May 2024b, <https://ehea.info/Immagini/ANNEX-1-EHEA-STATEMENTS-ON-FUNDAMENTAL-VALUES.pdf> [last accessed 30 June 2026].

European Higher Education Area, *Annex 3 to the Tirana Communiqué—GLOBAL POLICY FORUM STATEMENT*, 29-30 May 2024c. https://erasmusplus.org.ua/wp-content/uploads/2024/05/tirana_global-policy-forum-statement_2_neo_here_en_ua.pdf [last accessed 30 June 2026].

European Higher Education Area, *The European Higher Education Area (EHEA)*, 2026°. <http://www.ehea.info/page-the-bologna-follow-up-group> [last accessed 30 June 2026].

European Higher Education Area, *Consultative Members*, 2026b, <https://ehea.info/page-consultive-members> [last accessed 30 June 2026].

European Higher Education Area, *Ministerial Declarations And Communiqués*, 2026c. <http://www.ehea.info/page-ministerial-declarations-and-communiques> [last accessed 30 June 2026].

European Higher Education Area, *Bologna Implementation Coordination Group*, 2026d. <https://ehea.info/working-group/bologna-implementation-coordination-group/> [last accessed 30 June 2026].

European Quality Assurance Register for Higher Education (EQAR), *Essential info*, 2026. <https://www.eqar.eu/qa-results/find-out-more/essential-info/> [last accessed 30 June 2026].

European Union, *Consolidated Versions of the Treaty on European Union and the Treaty on the Functioning of the European Union*, "Official Journal of the European Union", C/83/01, 2010. Available on the EUR-Lex website of the European Union: https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.C_.2010.083.01.0001.01.ENG [last accessed 30 June 2026].

European Union, *Division of competences within the European Union*, Publications Office of the European Union, 24 February 2022. <https://eur-lex.europa.eu/EN/legal-content/summary/division-of-competences-within-the-european-union.html> [last accessed 30 June 2026].

European Union, *Glossary: European Union (EU)*, Publications Office of the European Union, 15 September 2025. https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=LEGISSUM:eu_union [last accessed 30 June 2026].

Felder-Stindt, A., Vukasovic, M., *Who you gonna call ... when developing a flagship initiative in an area of limited EU competence? A resource exchange perspective on the development of the European Universities Initiative (EUI)*. "Journal of European Integration", Vol. 48, no. 3, 2025, pp. 1-24. <https://doi.org/10.1080/07036337.2025.2498739>.

Frame, A., Curyło, B., *Bringing Erasmus home: The European universities initiative as an example of 'Everyday Europeanhood'*, "Journal of Contemporary European Studies", Vol. 32, no. 2, 2024, pp. 334-349. <https://doi.org/10.1080/14782804.2022.2134986>.

Gornitzka, Å., *Bologna in Context: A horizontal perspective on the dynamics of governance sites for a Europe of Knowledge*, "European Journal of Education", Vol. 45, no. 4, 2010, pp. 535-548. <https://doi.org/10.1111/j.1465-3435.2010.01452.x>.

Gornitzka, Å., Stensaker, B., *The dynamics of European regulatory regimes in higher education—Challenged prerogatives and evolutionary change*, "Policy and Society", Vol. 33, no. 3, 2014, pp. 177-188. <https://doi.org/10.1016/j.polsoc.2014.08.002>.

Grek, S., Russell, I., *Beyond Bologna? Infrastructuring quality in European higher education*, "European Educational Research Journal", Vol. 23, no. 2, 2024, pp. 215-236. <https://doi.org/10.1177/14749041231170518>.

Huisman, J., Adelman, C., Hsieh, C-C., et al., *Europe's Bologna Process and Its Impact on Global Higher Education*, in Deardorff, D., de Wit, H., Heyl, J., et al., *The SAGE Handbook of International Higher Education*, SAGE, New York, 2012, pp. 81-100. <https://doi.org/10.4135/9781452218397.n5>.

Janne, H., *For a Community policy on education*, European Communities Commission, 1973. <http://aei.pitt.edu/5588/1/5588.pdf>. [last accessed 30 June 2026].

Knight, J., *Higher Education in Turmoil The Changing World of Internationalization*, BRILL, Leiden, 2008.

Maassen, P., Musselin, C., *European Integration and the Europeanisation of Higher Education*, in Amaral, A., Neave, G., Musselin, C., et al., (eds), *European Integration and the Governance of Higher Education and Research*, Springer Netherlands, Dordrecht, 2009, pp. 3-14. https://doi.org/10.1007/978-1-4020-9505-4_1.

MAReN, MAReN Project, 2026. <https://marenetwork.info/maren-project/> [last accessed 30 June 2026].

Marginson, S., *Space and scale in higher education: The glonacal agency heuristic revisited*. "Higher Education", Vol. 84, no. 6, 2022, pp. 1365-1395. <https://doi.org/10.1007/s10734-022-00955-0>.

Marini, G., Oleksiyenko, A., *Academic freedom in the re-imagined post-Humboldtian Europe*, "Higher Education Quarterly", Vol. 76, no. 3, 2022, pp. 513-520. <https://doi.org/10.1111/hequ.12405>.

Matei, L., Crăciun, D., Potapova, E., *The Emergence and Design of a Transnational Policy Tool: Monitoring the Fundamental Values of Higher Education in the European Higher Education Area*, in Curaj, A., Hâj, C.M., Pricopie, R., (eds), *European Higher Education Area 2030: Bridging Realities for Tomorrow's Higher Education*, Springer, Cham, 2025, pp. 431-449. https://doi.org/10.1007/978-3-031-75140-0_23.

Neave, G., *The European Dimension in Higher Education: An Excursion into the Modern Use of Historical Analogues*. in Huisman, J., Maassen, P. A. M., Neave, G., (eds.), *Higher Education and the Nation State. The International Dimension of Higher Education*, Elsevier, Oxford, 2001, pp. 13-73.

Oleksiyenko, A., *Is academic freedom feasible in the post-Soviet space of higher education?*, "Educational Philosophy and Theory", Vol. 53, no. 11, 2021, pp. 1116-1126. <https://doi.org/10.1080/00131857.2020.1773799>.

Oleksiyenko, A., Jackson, L., *Freedom of speech, freedom to teach, freedom to learn: The crisis of higher education in the post-truth era*, "Educational Philosophy and Theory", Vol. 53. No. 11, pp. 1057-1062. <https://doi.org/10.1080/00131857.2020.1773800>.

Radaelli, C. M., *Europeanisation: Solution or problem?*, "European Integration Online Papers (EIoP)", Vol. 8, no. 16, 2004, pp. 1-23. <http://eiop.or.at/eiop/texte/2004-016a.htm>.

Rich, D., *The Bologna Process in European Higher Education*. in Peterson, P., Baker, E., McGaw, B. (eds.), *International Encyclopedia of Education*, Elsevier Science, Oxford, 2010, pp. 566-572. <https://doi.org/10.1016/B978-0-08-044894-7.00848-4>.

Stichweh, R., *The University as a World Organization*. In Mattei, P., Durmay, X., Mangez, E., et al., (eds), *The Oxford Handbook of Education and Globalization*, Oxford University Press, Oxford, 2023. <https://doi.org/10.1093/oxfordhb/9780197570685.013.46>.

Swedish Council for Higher Education, *Qualifications Assessment Tool*, 2026, pp. 424-442. <https://www.uhr.se/en/start/recognition-of-foreign-qualifications/qualifications-assessment-tool/> [last accessed 30 June 2026].

Tight, M., *Globalization and internationalization as frameworks for higher education research*. "Research Papers in Education", Vol. 36, no. 1, 2021, pp. 52-74. <https://doi.org/10.1080/02671522.2019.1633560>.

Vukasovic, M., *Change of higher education in response to European pressures: Conceptualization and operationalization of Europeanization of higher education*. "Higher Education", Vol. 66, no. 3, 2013, pp. 311-324. <https://doi.org/10.1007/s10734-012-9606-4>.

Vukasovic, M., *European-level policy dynamics in higher education*. in Zahariadis, N., Buonanno, L., (eds), *The Routledge Handbook of European Public Policy*, Routledge, London, 2017, pp. 373-379. <https://doi.org/10.4324/9781315682723-39>.

Vukasovic, M., Jungblut, J., Chou, M-H., et al., *Multi-level, Multi-actor and Multi-issue Dimensions of Governance of the European Higher Education Area, and Beyond*, in Curaj, A., Deca, L., Pricopie, R., (eds), *European Higher Education Area: The Impact of Past and Future Policies*, Springer, Cham, 2018, pp. 321-334. https://doi.org/10.1007/978-3-319-77407-7_20.

Wilkins, S., Huisman, J., *Transnational Education Redefined*, "International Higher Education", no. 121, 2024. <https://doi.org/10.6017/895b9e0d.4bf74947>.

Yung-Chi Hou, A., Morse, R., Wang, W., *Recognition of academic qualifications in transnational higher education and challenges for recognizing a joint degree in Europe and Asia*. "Studies in Higher Education", Vol. 42, no. 7, 2017, pp. 1211-1228. <https://doi.org/10.1080/03075079.2015.1085010>.

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Chiara Finocchietti is Director of CIMEA-NARIC Italia, the centre responsible for the recognition of foreign qualifications and international policies in the field of higher education. A geographer by training, she comes from the world of research and is an expert in policies and practices in the field of internationalisation of higher education. She has coordinated national and international projects and is a member of international working groups on education and higher education policies. She is a consultant to national and international organisations and authorities. Formerly a publishing house executive, she is the author of some twenty publications in various languages on the topics of credential evaluation, internationalisation of higher education, ethics in education, recognition of refugee qualifications, micro-credentials, transnational education, digitalisation and artificial intelligence. She is President of the ENIC network of the Council of Europe and UNESCO, and co-chair of the Thematic Peer Group on the recognition of the European Higher Education Area.

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Luca Lantero is the Director General of CIMEA, the Italian Information Center for Academic Mobility and Equivalence. He is one of the main experts at Italian and international level on higher education systems, on bogus diplomas and accreditation mills, transnational education, accreditation, and the digitalization of processes applied to recognition, particularly with the advent of blockchain and AI. From 2018 to 2020 he was the Head of the Bologna Follow-Up Group (BFUG) Secretariat of the European Higher Education Area (EHEA). He is currently President of the Lisbon Recognition Convention Committee and Head of the ASEM Education Secretariat. In 2022, Luca was elected a member of the Bureau of the Ethics, Transparency, and Integrity (ETINED) platform of the Council of Europe. In 2024, he was appointed Associate Professor of the European Law & Governance School (ELGS) and Director of the Institute for Higher Education Law and Governance (IHELG) housed by the European Public Law Organization (EPLO). He is the Director of the Centre for preventing and countering fraud in education and one of the expert participating in the Recognition and AI Working Group, both initiatives established by the Council of Europe. His scientific output is extensive and he participates in national and international research projects and programmes in the field of higher education studies. He is currently the Editor-in-Chief of Rivista Universitas.

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