

Russell Group response to the Government Review of the Balance of Competences between the UK and EU: Education

1. Introduction

- 1.1 The purpose of The Russell Group is to provide strategic direction, policy development and communications for 24 major research-intensive universities in the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.
- 1.2 We welcome the opportunity to comment on the balance of competences between the UK and the EU in relation to education. There are many benefits to the UK of EU action in the area of education and training. However, it should be kept in mind that the UK higher education landscape is very different to that in other EU Member States. The major challenge for the UK is therefore in sustaining and improving cooperation across Europe in mutually beneficial areas whilst maintaining our world-class universities and protecting their autonomy.
- 1.3 Russell Group universities are highly international and have a large body of students (over 52,000) and staff (over 18,500) from other EU countries. Nearly half of all students participating in the Erasmus programme in 2012/13 were from Russell Group universities¹ and Russell Group institutions hosted 63% of the UK's Marie Curie researchers under Framework Programme 7 (FP7).²
- 1.4 The Russell Group has also provided responses to the Balance of Competences reviews on Research & Development, Asylum & Immigration, Free Movement of Persons and the EU Budget. There are overlaps between education and training and R&D and free movement of persons in particular and this response should be considered alongside arguments presented in the Russell Group's other responses.

2. The role of the EU in education and training

- 2.1 As highlighted in the call for evidence document, EU institutions cannot take direct action in relation to the content and organisation of Member States' education systems and collaboration is mainly managed through intergovernmental cooperation in the EU Education Council. Indeed, it is emphasised that Article 165 TFEU specifically prohibits any harmonisation by the EU in the area of education. The Russell Group would not wish to see any change to these legal provisions nor to the voluntary nature of cooperation on education policy which is currently exercised. The UK education system is very different to many of the systems in other EU Member States. Whilst there are great benefits of international cooperation, any move towards standardising or harmonising systems across the EU could pose a serious threat to the UK's world-

¹ 48%: figure derived from British Council Erasmus Participation Statistics.

² European Commission E-CORDA data extracted February 2014.

leading universities. Education policy is ultimately the responsibility of Member States and this should not change.

- 2.2 The European Commission Communication *Supporting growth and jobs – an agenda for the modernisation of Europe's higher education systems* emphasised the importance of institutional autonomy. This is fully supported by the Russell Group and the principle of autonomy must underpin any EU policy developments on education and training.
- 2.3 With regard to the Bologna Process, it should continue to function on a voluntary basis and remain separate from, yet complementary to, EU education policy developments. The scope of the Bologna Process goes beyond just EU Member States and achievements that have been made so far are as a result of the voluntary and autonomous nature of the process. It is essential to maintain flexibility to allow the process to encompass the wide range of HE systems and qualifications in the European Higher Education Area (EHEA).
- 2.4 The 40% increase in the budget for Erasmus+ compared to the 2007-2013 programmes demonstrates a greater emphasis from Member States, the European Parliament and the Commission on education, training and mobility of students and teachers. The EU should continue to invest in these areas as there are significant benefits for the European economy, but not at the expense of investment in world-class research such as through the ERC.
- 2.5 The EU could also make better use of cohesion funding to support education and training in less developed regions of the UK and Europe. In particular, these funds could be used to help improve the quality of education and training facilities in universities, especially where there are strong links with high quality research and innovation activities and with business.
- 2.6 Projects from the European Social Fund (ESF) designed to improve employability and education can have an impact in the UK. Universities and further education colleges are vital links in this system. The ESF can provide support for university postgraduate research and development, such as the Knowledge Economy Skills Scholarships (KESS) project in Wales involving the University of Cardiff, which provides funding for PhD and MRes study in collaboration with company partners.³ It can also support career-planning schemes aiming to enable graduates to have a better chance of utilising their degree and securing employment.

3. The benefits of EU action in the areas of education and training

- 3.1 There are significant benefits to the UK of EU action in some areas of education and training. However, these actions are advantageous because they are in addition to (rather than instead of) national government action: the key to success is that EU programmes should complement national policies.
- 3.2 Russell Group universities have numerous international student and staff exchange programmes and are by no means limited to European programmes in this respect. However, programmes like Erasmus are valuable to universities not only because they encourage and facilitate the mobility of staff and students, but because they can also provide a useful platform on which institutions are able to build a wider set of exchange programmes around the world.

³ <http://www.higherskillswales.co.uk/kess/index.php.en?menu=0&catid=0>

- 3.3 Moreover, it is difficult to imagine how a Europe-wide exchange programme on the scale of Erasmus and with a similar level of funding could be implemented on a national level. Non-EU Member States recognise the great benefits of being involved in EU programmes, but must pay for the privilege of participating. For example, in order to participate in the Erasmus+ programme, Switzerland will have to pay around £15m (CHF 22.7m) for 2014 and they (not the European Commission) must cover all costs, including those for incoming participants.⁴
- 3.4 Student and staff exchange programmes have a number of advantages. From the point of view of outgoing students, having the opportunity to study abroad can help improve language skills, enhance cultural awareness, expose new methods of learning and working and increase independence and maturity, amongst many other benefits. These skills and experiences are highly sought-after by employers and can therefore boost graduates' employment prospects.
- 3.5 From the perspective of institutions, international students make a vital contribution to the success of our universities and are often highly motivated and entrepreneurial. They contribute to a diverse student body and a thriving society, culture and economy. Although Erasmus students make up a relatively small number of the overall international student numbers in the UK, they are an important part of the international student community. One of the main benefits of the Erasmus programme is that it allows students who may not have otherwise been able to afford the cost of tuition and higher living costs in the UK to spend a period of time in a UK institution as the programme provides them with a fee waiver and a grant for living expenses. The same is, of course, true for lower-income UK students who may not have the means to go abroad without the financial support of the Erasmus programme.
- 3.6 The EHEA Ministerial Conference in Bucharest in 2012 set out a mobility strategy which highlights that 'Promoting high quality mobility of students, early stage researchers, teachers and other staff in higher education has been a central objective of the Bologna Process from the very beginning.' There is complementarity here with the priorities of the European Research Area (ERA), which include 'an open labour market for researchers', aiming to remove barriers to researcher mobility, training and attractive careers. These overlapping objectives of promoting mobility are reinforced by EU programmes such as Erasmus and Horizon 2020, which can underpin invaluable links between staff with counterparts overseas. Global academic links are essential to world-class research and the advancement of ideas. The Erasmus staff exchange programme and Marie-Skłodowska Curie Actions in particular can promote cooperation and sharing of best practice between European institutions and can foster relationships between staff and institutions that continue in the long term.
- 3.7 Opportunities for wider international partnerships through education initiatives are vital to the UK, not only for the benefits to the individuals and the institutions concerned but because of the value of UK higher education as an export commodity. Higher education is one of this country's most successful export industries, estimated to contribute more than £10 billion a year to the UK economy in overseas earnings. Networks initially created through EU programmes or initiatives can form the basis of much longer-term collaboration between researchers, institutions and nations and are at the heart of wider international engagement. Furthermore, the partnerships created between institutions through EU programmes can be beneficial for raising the profile and reputation of a university abroad.

⁴ <http://www.sbf.admin.ch/erasmus-e> This is an interim solution for Switzerland following the referendum in February on immigration quotas which has led to the suspension of negotiations between the EU and Switzerland regarding Switzerland's association to Erasmus+ and Horizon 2020.

- 3.8 The Erasmus brand is effective in attracting students to study abroad. Whilst many institutions also have their own individual agreements with partner institutions overseas, these may be lesser known than the Erasmus programme and less widely promoted in the UK and in Europe. Erasmus is recognised by universities and employers across Europe so students will benefit from recognition of their placement both in the UK and abroad.
- 3.9 Since Erasmus is funded by the EU with centralised rules and funding agreements, it is likely to be less costly than if universities were to try and replicate the system themselves and arrange bilateral exchanges with one another, which might then create a different set of rules for each individual agreement. In particular, the Erasmus programme provides students with a grant whilst they are abroad which would have to be provided by national government or the institutions themselves if there was not an EU programme in place.
- 3.10 The emerging architecture around credits, transportability of degrees and recognition of qualifications will be increasingly important for UK graduates. Development of these structures helps improve the mobility of graduates and therefore enhances their employability in other European countries, with subsequent benefits for employers looking to hire international personnel.
- 3.11 EU action on education and training can focus on longer-term issues and challenges, whereas it may be argued that national policies are often focused on more short-term measures and can be influenced to a greater extent by a range of political and other factors (including budgets). Historically EU programmes have been more stable, which has enabled universities to plan ahead and have greater certainty in funding streams, particularly for multi-annual programmes which typically run for seven years as opposed to five year national government terms.
- 3.12 Although there may be criticisms of specific elements of EU education or training programmes, not least regarding some of the bureaucracy involved, current EU action is broadly beneficial for Russell Group universities.

4. Disadvantages of EU action in the areas of education and training

- 4.1 As with many EU programmes, there is a great deal of bureaucracy associated with the Erasmus programme and particularly concerning new requirements for Erasmus+ which make the programme more complicated and therefore more resource-intensive to administer than previously. Examples of issues include the increased paperwork involved in the student exchange and learning agreements and new rules about language training. It has been remarked that the new language assessment tool, which all students studying in another language will have to complete before and after their mobility, may disadvantage and perhaps dissuade some UK students. Although the UK has an important role to play in influencing the design and implementation of EU programmes, it will inevitably have to accept elements of programmes which it may not have included in a national programme.
- 4.2 The costs to universities of administering the Erasmus programme are substantial and increasing. There is also a cost dimension related to the hosting of incoming Erasmus students who benefit from a UK university experience and education without paying fees.
- 4.3 One area of EU activity in education where it is difficult to see the benefit is the European Commission's U-Multirank university comparison tool. It is highly

questionable why the Commission is using its limited resources to produce yet another ranking tool. Participating in U-Multirank is resource-intensive for universities, who are required to collate additional information about their work (in contrast to other university rankings, which use the extensive data that is already available). Making meaningful comparisons of universities both within, and across, national borders is a tough and complex challenge, not least because of issues relating to the robustness and comparability of data.

- 4.4 It is clear from the results of the first round of U-Multirank, which were published on 13 May 2014, that there is a significant lack of data for a large number of institutions for many of the indicators in the tables. This makes comparisons of universities (the core rationale behind U-Multirank) problematic and in some cases very misleading. Since institutions volunteer to participate in U-Multirank comparison by most indicators is only possible for those institutions that took part in the exercise, making the results incomplete and imperfect. The majority of UK universities did not actively participate in U-Multirank yet some publicly available data was used for 28 UK universities (with no explanation as to why some were selected over others). This creates two different sets of information with no clear indication for users as to why some universities are included in some parts of U-Multirank and not in other parts, ultimately leading to confusing and misrepresentative results.
- 4.5 The Russell Group would be extremely concerned if U-Multirank were ever to be used to allocate EU research funding or Erasmus+ grants and would strongly resist any movement in this direction.

5. Opportunities and challenges for the UK

- 5.1 It is important for the UK to be at the heart of the Bologna Process. Fully engaging with the Process will allow the UK to keep up with best practice in Europe as higher education systems evolve. The UK higher education system has traditionally been ahead of those in other European countries, but the gap is narrowing as other systems develop, particularly as countries such as France and Germany are investing billions into their leading universities. Sustained funding for higher education, in particular for doctoral training, from both the national government and the EU will be essential to maintain the UK's competitive position in relation to other higher education systems both within and outside of Europe.
- 5.2 The main challenge for the UK is to improve cooperation with European countries in areas of mutual interest, such as the recognition of education qualifications and mobility, whilst maintaining the unique strengths of our own HE system. The UK should resist any moves towards harmonisation of education systems, particularly if it would involve adopting the types of education systems more commonly found in Continental Europe, where universities tend to be less selective, but have lower completion rates than most UK institutions.
- 5.3 There is a growing sense that the European Commission is trying to accrue policy competence in the area of education, which is partly a result of linking education to other growth strategies on the EU agenda. By framing research and development policy in terms of the Europe 2020 strategy the Commission has emphasised the role that universities, as both research and training centres, play in contributing to growth, innovation and knowledge transfer in the European economy. This creates an explicit link between tertiary education, research and development and the Single Market, where the Commission has a more clearly enshrined role in policy-making and regulation. Consequently education appears to be becoming more of a Community

rather than an intergovernmental process, with a gradual shift of competences to the European Commission.

- 5.4 We would argue strongly that the principle of subsidiarity in the area of higher education must be maintained and the UK should push back against over-prescription or unwarranted intervention from the Commission. For this reason it will be extremely important for UK MEPs to have a strong voice in the European Parliament's Industry Research and Energy (ITRE) Committee and the Culture and Education (CULT) Committee, as well as strong representation by UK Ministers in the European Council.
- 5.5 The UK should be cautious about any 'competence creep' by the European Commission in the area of education and training. In particular, increasing EU control over the 'third cycle' (i.e. doctoral training) could be very problematic for the UK. It is a positive development that European doctoral training is moving closer towards the UK model, but differences in the length and nature of a PhD in the UK compared to other EU Member States remain. Institutional autonomy must be central to any policies concerning the 'third cycle' and any initiatives intended to standardise or give credit value to doctoral training across Europe should be opposed.
- 5.6 The UK is the second most popular destination in the world for PhD students, behind only the USA.⁵ International students are attracted to the extremely high quality of doctoral education in the UK and whilst European activities or actions may help European countries share best practice, they must not in any way undermine the quality of training offered by UK universities. The focus for doctoral training must be on the quality of the outcome and experience gained; a doctorate is not just training for research, but training by research. In short, given the diverse nature of doctoral education, it should not be over-regulated.
- 5.7 European countries are learning from the UK and making rapid improvements in the provision of 'third cycle' training. If we are to continue to attract the most talented researchers from around the world the UK must ensure that it is fully engaged in developments in European education activities and in the Bologna Process in order to keep abreast of any changes and stay ahead of the game.
- 5.8 A particular challenge for the UK is the recognition of masters courses elsewhere in Europe, in particular for graduates who wish to go on to pursue further studies at another European university. Masters degrees at Russell Group universities are extremely rigorous, academically demanding and typically highly research-focused. However, most full-time masters in the UK are one year long, compared to two years more commonly used in other European countries. The Bologna Process does currently not place requirements on the length of 'second cycle' degrees and it is essential that the Bologna Process and the EU focus on the quality of education and training courses and on the learning outcomes of a course, rather than the length of study. Stipulating the lengths of masters courses is not only an ineffective method of assessing quality and outcomes, but would unfairly and wrongly discriminate against the UK system. The UK must strongly advocate the high quality and benefits of its masters programmes and ensure that this message is communicated effectively across Europe and to the EU.
- 5.9 As part of the Europe 2020 strategy, the EU has a target that 40% of those aged 30-34 should have a higher education or equivalent qualification by 2020. Figures show that 40% of young people in England enter higher education by the age of 19⁶ and this

⁵ OECD *education at a glance* 2013.

⁶ UCAS 2013 Application Cycle: End of Cycle Report (2013).

proportion is expected to rise following the Government's removal of the student number cap in 2015. For the UK, therefore, maintaining quality and high standards across the higher education system is a more important priority than increasing overall student numbers. Whilst the EU target may be helpful for some Member States in order to implement policies to increase participation in higher education, its imposition could have serious negative consequences if student numbers grow at the expense of quality. If this is the case the target is unlikely to deliver the economic and social benefits that the EU is seeking. The EU must therefore continue to focus on the quality and not just quantity of higher education across Europe.

Opportunities in Erasmus+

- 5.10 Although the number of UK students participating in Erasmus has doubled between 2006/07 and 2012/13, the UK could seek to improve the mobility of its students through the new Erasmus+ programme. Currently there are a relatively small proportion of British students who take part in the programme compared to other EU countries – less than 2% of UK students graduating in 2013 were Erasmus students (14,607 students), compared to 10% of students in Spain (39,500), 6% of students in Germany (33,300) and 4% in France (33,200). Now that the budget for Erasmus+ has increased by 40% for 2014-2020 compared to the previous programmes, there is a real opportunity for UK students to maximise the benefits of this programme.
- 5.11 The Student Loan Guarantee Facility is a new element of Erasmus+ and is not yet fully underway. Nevertheless, the Russell Group is interested in the outcome of this novel way of financing masters courses undertaken in another European country. This tool will hopefully increase mobility of postgraduate students in Europe and encourage more students to consider a masters as they should be able to access loans with favourable rates from participating financial intermediaries.
- 5.12 The international dimension of Erasmus (formerly Erasmus Mundus) also offers new opportunities and may particularly appeal to UK students, staff and researchers wishing to spend a period of time abroad in an English-speaking country such as the US, Canada or Australia. It will also allow UK institutions to improve collaboration and mobility with countries where they have strong partnerships but are currently unable to support mobility due to the higher cost of living and tuition fees in the UK.

6. The impact of other areas of EU competence on education and training

- 6.1 There are a number of other areas which impact on education and training, including the EU budget, the EU research and innovation framework programme, free movement of persons, asylum and immigration and mutual recognition of professional qualifications. The Russell Group responses to the relevant Balance of Competences Reviews in these areas address the issues in more detail. However, this response will provide a summary of some key issues.
- 6.2 The EU Framework Programme for research is hugely beneficial for UK universities and EU R&D policy more generally has a significant impact on the UK's higher education sector. Research, education, employability and competitiveness have become increasingly interlinked as the Single Market, the European Research Area, Framework Programmes, Erasmus and the Bologna Process are mutually-reinforcing frameworks. Education and training competences are therefore directly linked with research and development.

- 6.3 With regard to specific education and training actions in the EU research programme, the Marie Curie Actions – now Marie Skłodowska-Curie Actions (MSCA) under Horizon 2020 – are particularly valuable for UK institutions and researchers. Under Framework Programme 7 (FP7) the 24 Russell Group universities hosted more Marie Curie grants (2,289) than any other EU Member State and a third more grants than all higher education institutions in Germany and France put together.⁷
- 6.4 MSCAs support the career development and training of researchers through international and cross-sector mobility. Under Horizon 2020 the Commission predicts that it will support 25,000 PhDs across Europe through MSCAs. The programme has enabled Russell Group institutions to attract and retain excellent overseas researchers, conferring substantial benefits to the UK research base. Funding through MSCA can also generate networks of research partners which become the core of longer-term relationships after initial EU-funded projects have finished. A strong base of exceptionally talented scientists and researchers who generate ideas and innovations is key to the ability of any country to compete in a global knowledge economy.
- 6.5 The European Institute of Innovation and Technology (EIT) is another area of the research programme which has a direct impact on education and training. The EIT is modelled around the so-called knowledge triangle of business, higher education and research, with partners involved in projects from all three of these sectors. The Knowledge and Innovation Communities (KICs) have set up their own education programmes and the EIT expects to train 10,000 masters students and 10,000 PhD candidates between 2014 and 2020 in courses that combine scientific and technical content with a strong focus on entrepreneurship.⁸ For example, students enrolled in relevant masters courses at Imperial College London, which is the central co-location centre for the EIT's Climate KIC, can take part in the Climate KIC Master Programme. This programme includes a five-week climate innovation summer school and gives students the opportunity to obtain a certain number of credits of their masters programme outside of the university (e.g. on an internship), as well as the chance to take complementary courses in climate sciences or entrepreneurship.
- 6.6 The amount of the EU budget allocated to education and training is extremely important. The Russell Group welcomes the 30% increase in funding for MSCA under Horizon 2020 compared to FP7, as well as the 40% increase in the budget for Erasmus+ compared to the 2007-2013 programmes. The eight-fold increase in the budget for the EIT will also present a huge opportunity for increased participation of UK universities, students, researchers and businesses. The Russell Group continues to support an increase in the share of the EU budget allocated to research, innovation, education and training.
- 6.7 The strength of the UK's leading universities internationally lies in their ability to attract the most talented staff and students from within and outside the EU. EU rules on the free movement of persons are very valuable to the UK universities – and to Russell Group universities in particular – as they allow institutions to attract EU-national staff and students without having to negotiate the UK visa system, with the associated expense and administrative burden for both parties.
- 6.8 Mutual Recognition of Professional Qualifications is a key area of EU competence which affects education and training. The Russell Group universities train over 80% of medical and dentistry students in the UK. Ensuring that these students' degrees

⁷ European Commission E-CORDA data extracted February 2014.

⁸ <http://eit.europa.eu/education/>

continue to be recognised in the EU is absolutely critical. There were serious concerns during the recent drafting of the Modernisation of the Professional Qualifications Directive that UK medical degrees would not be recognised in other EU Member States due to the shorter length of medical degrees in the UK. This issue has been resolved, at least for the time being, but could have had an extremely serious impact on UK-qualified medics wishing to work elsewhere in the EU. It is important to ensure that all UK-accredited professionals are able to work in other European countries and that the EU does not require the re-design of UK training programmes which are already quality assured nationally in order to meet rules on recognition.

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