



MINISTRY
OF EDUCATION AND SCIENCE
OF UKRAINE

Draft Report and Recommendation of the Ad Hoc Group on the application of San Marino to join the EHEA

1. ADMISSION CRITERIA AND APPLICATION PROCESS

The criteria for admission of new members to the Bologna Process and since 2010 to the European Higher Education Area were decided by the Ministers in 2003 Berlin Communiqué. The two criteria are:

- an applicant country needs to be party to the European Cultural Convention¹;
- the competent public authorities of the applicant country need to commit to and implement the values, goals and key policies of the EHEA.

The decision to accept new members to the European Higher Education Area is taken by the Ministers responsible for higher education in the countries participating in the Bologna Process – so far, this has always happened at Ministerial Conferences.

Countries wishing to join the EHEA are asked to send an application for membership to the Minister(s) responsible for higher education in the host country/countries of the next Ministerial Conference and the countries co-chairing the Bologna Process, with a copy to the Bologna Secretariat. The application should be signed by the (national) Minister responsible for higher education, submitted by a given deadline, and be complemented by the required National Report.

The Bologna Follow Up Group assesses the application and the accompanying national report on the basis of the criteria for admission described above² and agrees on the recommendation to be given to the Ministers. The Ministers then decide whether or not to admit a country as a member of the Bologna Process and the European Higher Education Area.

The BFUG Secretariat received an application from the government of the Republic of San Marino to join the European Higher Education Area on 9 August 2019. In its application, the San Marino government states that joining the Bologna Process would give an opportunity to increase the quality of its higher education system and to take part in the development of a more democratic, inclusive and sustainable society. San Marino also declares its willingness and commitment to pursue and implement the objectives of the Bologna Process and confirms its adherence to the principles of international mobility of students and staff, autonomous universities, student participation in the governance of higher education, the public responsibility of higher education and the social dimension of the Bologna Process.

The European Cultural Convention came into force with respect to San Marino on 13 February 1986. Therefore, San Marino fulfills the first criterion as it is a party to the European Cultural Convention.

At its meeting in Helsinki in November 2019, the BFUG established an Ad Hoc Group to review the fulfilment of the second criterion and to prepare a recommendation to the EHEA Ministers on whether and how to

¹ For an updated overview of signatures and ratifications, see https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/018/signatures?p_auth=m2eC09S4.

² The BFUG has often appointed *ad hoc* working groups to assist it in assessing applications.

admit San Marino to the EHEA. The Ad Hoc Group consists of representatives of Finland (Chair), Andorra, the Council of Europe, the Holy See, Turkey, Working Group 1 on Monitoring and the BFUG Vice-Chair. It is served by the BFUG Secretariat.

The assessment of the Ad Hoc Group is based on the national report of San Marino and discussions with the Sammarinese authorities. San Marino submitted a preliminary national report with the application letter. The BFUG decided that San Marino could revise the report by 10 January 2020. The revised version did not include sufficient information about the implementation of the key commitments and fundamental values of the EHEA and the Ad Hoc Group considered that San Marino's national report also lacked an analysis and self-assessment of where the San Marino public authorities responsible for higher education believe the system stands with regard to EHEA commitments and goals. Therefore, the Ad Hoc Group and Sammarinese authorities agreed that San Marino would work to further improve and clarify the national report. The final version of the national report was submitted to the BFUG for its meeting on 25 June. In addition to the written information, the Ad Hoc Group met with the San Marino representatives on 19 February in Rome and on 14 and on 26 May in online meetings. The purpose of the dialogue was to gain a better understanding of San Marino's higher education system and its context and to fill in the gaps in the information provided.

2. ELEMENTS FOR ASSESSING THE APPLICATION

2.1. Overview of the higher education system

San Marino has a small higher education system with one public university, the *Università degli Studi della Repubblica di San Marino*. There are no private institutions. The university has about 1 000 students enrolled in the 2019/2020 academic year. The number of students has increased in recent years. Over 80% of the students are Italian; about 15% are Sammarinese and 4% are other international students in the first, second and third cycle programmes. The share of Sammarinese students is higher in the programmes outside the Bologna structure as these directly serve the local labour market. The annual intake is about 300 students in the first, second and third cycle programmes and about 180 in the programmes outside Bologna structure. Students pay tuition fees in all the higher education programmes.

All degrees awarded by the University are double degrees (*titoli doppi*) with Italian partner universities, with one exception which is a joint degree. Depending on individual agreements, students normally spend the first two years in San Marino and 6 months of the third year at the Italian partner university. Some students do the first two years at the Italian university and in the third year come for 6 months to San Marino to obtain the double degree. Double degrees help students to find employment in Italy or in San Marino.

The academic staff of the university consists of full professors, associate professors, researchers and teaching assistants. The university has 10 full-time professors (*docenti strutturati*), who can either be full or associate professors or researchers. In addition, there are Italian partner universities' professors who have specific contracts for teaching in the University of San Marino.

54% of the funding of the university comes from the government, 42% from tuition fees, 1.5% from other public entities, and 2.5% from private entities that fund specific projects.

The national report provides an overview of the legislative framework of the university. In 2014 San Marino adopted a new framework university law. The motivation for legislative reform was to reform higher education in line with the objectives and commitments of the Bologna Process. The reform introduced implementation of the three cycle degree structure, policies of internal and external quality assurance,

implementation and use of the ECTS system, promotion of student and staff mobility, improvement of student services and reforms in university governance.

2.2. Degrees and Qualifications Framework

San Marino's higher education degree system corresponds to the Italian qualifications framework. It consists of first cycle programmes (*Corsi di Laurea*) of 180 ECTS, second cycle programmes (*Corsi di Laurea Magistrale*) of 120 ECTS and third cycle *Corsi di Dottorato di Ricerca*. The legislation includes the possibility to establish integrated long degree programmes (*Laurea Magistrale a ciclo unico*), but no such programme exists at the moment. Currently there are 5 degree programmes in the first cycle (Design, Communication and Digital Media, Civil and Environmental Engineering, Management Engineering and Construction and Land Management). In 2019 there were 130 graduates from the first cycle. There are three second cycle programmes (Design, Management engineering and Civil and environmental engineering). There are plans to create a second cycle programme in Communication and Digital Media soon. In 2019 the University of San Marino had 23 graduates from the second cycle. The university is working on expanding the second cycle and making it more attractive. In the third cycle there is one programme in Historical Studies.

In addition, there are several other programmes outside the Bologna structures (*Corsi di Master Universitario di primo livello e secondo livello, Corsi di Alta Formazione*). These programmes offer for example further specialization or continuing education after the completion of the first and second cycle degrees. The number of these programmes changes every year as the courses are organized on the basis of the labour market's needs. The relationship of these qualifications to the first, second, and third cycles of the prospective qualifications framework may require further clarification. About 180-200 students study in these other programmes, which therefore concern $\frac{1}{4}$ of all the students of the University of San Marino.

According to San Marino's national report, the ECTS system is adopted and used as its credit system by the University of San Marino. The University links study credits with both learning outcomes and student workload and includes attainment of learning outcomes in assessment procedures. The process of updating the online description of its degree programmes is underway in the University of San Marino.

The development of a National Qualifications Framework has started and is in its early stages: steps 1-3³. The Government has decided to set up a comprehensive National Qualifications Framework for the entire education system, including higher education. A working group in charge of drafting the NQF was established in March 2020. There are plans to reach step 4 (first sketch of the profile, level structure, level descriptors and credit ranges) within 6 months. Stakeholder involvement in the process is planned.

The Ad Hoc Group notes that there is clear commitment from the Government of San Marino to develop a NQF compatible with the QF-EHEA. The estimated time for the development of the NQF by San Marino is 12-18 months.

There is no reference to the EQF-LLL for the pre higher education levels of what are referred to as plans for an NQF for the entire San Marino education system. This leaves open on what basis this part of the NQF would be developed.

2.3. Quality Assurance

³ For an overview of the 10 steps in developing a National Qualifications Framework, see <http://www.ehea.info/cid102844/national-qualifications-frameworks-2009.html>.

As a small system of higher education, San Marino faces specific challenges for quality assuring higher education. The report describes reforms to strengthen both internal and external quality assurance.

The internal quality assurance system covers curricula design, teaching and research activities, the third mission and administrative processes. Internal quality is monitored through questionnaires to all students. However, the report gives little information about how the quality culture is furthered and promoted as part of the internal quality assurance.

For external quality assurance and evaluation an Independent Assessment Body was established in December 2019. It is a permanent body that consists of two external lecturers and one internal lecturer of the University. Students are not represented in this Assessment Body. Students are involved in the internal QA. There is no reference to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)⁴ in the national report; these are, however, the basis for quality assurance within the EHEA.

San Marino does not plan to establish a national quality assurance agency but it will seek to make an agreement with a foreign QA agency. This is an understandable decision and it will strengthen the credibility and transparency of the quality assurance arrangements in a small higher education system. One criterion for selecting a partner agency should be that it be a member of ENQA and/or EQAR, and hence that it operates in accordance with the ESG.

2.4. Recognition of qualification

Academic recognition is mainly the responsibility of the University of San Marino. It applies the principles of the Lisbon Recognition Convention (LRC)⁵, which San Marino ratified in December 2011.

The responsibility of the public authorities to verify the compliance with the LRC is carried out in close cooperation with the University. In practice the CINERTA (ENIC San Marino) works very closely with the student office of the university. If there are doubts with regard to specific applications, the ENIC assists and in general makes sure that the LRC is respected. Recognition for certain regulated professions is the responsibility of the State administration.

The national report implies that further legislation on recognition of qualifications, for example art. 7, will be taken into consideration in the next university law.

2.5. Social dimension and lifelong learning

The National Report of San Marino gives some examples of the measures taken to promote the social dimension. On the basis of the report, San Marino makes a point of supporting students with special needs and disabilities in education and training.

State scholarships and study grants are granted based on merit and income to all San Marino students who apply for them. The University of San Marino offers scholarships to cover all or part of the tuition fees. Portability of loans and grants are not guaranteed, but each case is evaluated individually.

⁴ <http://ehea.info/page-standards-and-guidelines-for-quality-assurance>

⁵ <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/165>

Access to higher education in the first cycle study programmes is on the basis of a school leaving qualification (*maturità*) obtained after 13 years of primary and secondary schooling or with a foreign secondary school leaving qualification giving access to higher education. At present it seems that no alternative access routes to higher education are contemplated and that there are no plans to introduce them. Therefore, the possibilities offered by alternative learning paths, including for access to higher education, is underexplored. For promoting lifelong learning, the University of San Marino provides flexible study times without extra fees for students already in working life. San Marino has no legal basis for recognizing informal or non-formal prior learning, although this is an aspect foreseen by the ECTS Users' Guide.

2.6. Higher education governance, student and staff participation

The central governing bodies of the San Marino University by legislation are the Rector, the University Council and the Academic Senate. The University Council is responsible for budgets and strategic development plans. The composition of the University of Council includes the rector, a representative of the State Secretariat, a representative of the professors and two members of the Parliament. Students and administrative staff have one representative each without voting rights.

The Academic Senate is responsible for academic affairs, education and research. Students and staff have representatives in it.

The Rector is elected by the Academic Senate and then the appointment is formally ratified by the Parliament (*Consiglio Grande e Generale*). The Parliament has the power to accept or reject the Academic Senate's candidate; it cannot appoint a candidate who has not been proposed by the University.

The University has a Students' Council. The Students' Council elects its representatives who participate in the main governing bodies of the university. There are 9 student representatives in the governing bodies. The San Marino authorities report that it is sometimes difficult to activate students in the governance of the university in a small system. The positive side is that the interaction between professors, students and the administration is easy. There is no student union; the group was informed there has been no desire to establish one.

3. CONCLUSIONS/RECOMMENDATIONS TO THE BFUG

The BFUG can recommend one of the three options to the Ministers:

- 1) San Marino is admitted to the EHEA
- 2) San Marino is admitted to the EHEA with a roadmap
- 3) Rejection of San Marino's application

As pointed out above, San Marino fulfills the first criterion for admission to the EHEA as it is a party to the European Cultural Convention. The Ad Hoc Group has therefore reviewed whether and to what extent San Marino fulfills the second admission criteria: commitment to and implementation of the values, goals and key policies of the EHEA.

Rejection of the application could be justified only if the higher education system does not correspond to the core structures of the Bologna Process especially in the areas of key commitments (degree structure, quality assurance, recognition) and fundamental values and if there are no clear plans for further reforms in these areas. San Marino has not yet fully implemented all the key commitments, but full implementation has not

been required of other countries which have been admitted previously, nor have any of the current members of the EHEA demonstrated full implementation of all the commitments. In addition, San Marino has assured political will for necessary reforms and showed willingness to cooperate with the BFUG and other countries to further develop its higher education system along the lines of the EHEA. In the view of the Ad Hoc Group, rejecting the application would therefore not be justified.

Membership in the EHEA requires that San Marino participate in the work of the BFUG and in the implementation of the work programme as do the other members. San Marino should appoint a delegation of 1-2 members to the BFUG and the delegation should attend all meetings of the BFUG. It is also important to ensure continuity in the representation throughout the work period.

In the view of the fact that San Marino would join the EHEA 21 years after the launch of the Bologna Process and 10 years after the European Higher Education Area was officially established, **the Ad Hoc Group recommends that San Marino should be admitted to the EHEA with a roadmap for the next period of the EHEA work programme.** Such a road map would be useful to give further guidance and clarify how and when San Marino will meet the specific challenges of the implementation of EHEA goals and principles.

The Ad Hoc Group proposes that it will draft such a roadmap together with the Sammarinese authorities so that Ministers can agree on it in November. The roadmap will build on the national report submitted by San Marino in conjunction with its application for accession to the EHEA, the declarations and communiques adopted by the EHEA Ministers, the Bologna Process Implementation Report, and discussions between the BFUG and the Sammarinese authorities. Under this roadmap the Sammarinese authorities would, in full respect of the competences of the Government, the Parliament, the University, and other stakeholders commit to structural and legislative reforms. The roadmap would be followed by the BFUG. The BFUG would report back to the EHEA Ministers in 2023 on the implementation of the roadmap.

The roadmap should address the following elements and set a clear timetable for reforms:

Commitment to the development of a National Qualification Framework compatible with the QF-EHEA including self-certification process

- Furthermore, San Marino may wish to consider the participation of foreign experts in the development of the NQF. Self-certification will have to include foreign experts, but advice could be useful at earlier stages.
- San Marino should give consideration to the place of the higher education programmes outside the “Bologna structure” within the NQF.

Strengthening the social dimension by introducing alternative access routes to higher education and recognition of prior learning

- Include in the NQF access routes to higher education alternative to a secondary school leaving qualification.
- Principles of recognizing prior learning, including informal and non-formal learning should be introduced as part of the implementation of the ECTS User Guide.

Commitment to developing quality assurance system in line with the ESG

- There is a need to clarify how San Marino plans to quality assure its higher education against the ESG and establish a timetable for necessary reforms.
- As the Independent Assessment Body is considered as part of the external quality assurance system the involvement of the internal lecturer is questionable.

- The roles and functions of Independent Assessment Body and foreign QQA agency also needs to be clarified.

Strengthening students' and staff participation in the governance of the University

- The Ad Hoc Group notes that having the students represented in the governing bodies in a structured way is beneficial for both students and the higher education community at large. Higher education should also comprise an understanding of the importance of and commitment to civic participation.
- The provisions for student and staff participation in the HE governance is currently inadequate. The Student Council cannot substitute student representation with voting rights in the university governance bodies. However, the government intends to make changes in the legislation in order to extend the right to vote to both students and administrative staff in all governance bodies. The timetable for this reform should be planned.
- San Marino may also consider whether having the representatives of the State in the University Council promotes the institutional autonomy of the University.
- The Code of Ethics which is included in the regulatory acts of the University could be promoted as a good practice among the EHEA member countries.

Active participation in peer support groups

- The Ad Hoc Group recommends that San Marino actively participate in the work of all BFUG peer support groups in order to strengthen the implementation of the key commitments.