

UPDATE ON ESG REVISION

BFUG FEEDBACK ON ESG DRAFT 3

BFUG BOARD MEETING, SEPTEMBER 2026



PROGRESS AND TIMELINES

- 14 September: deadline for BFUG feedback on draft 3
- 25 September: ESG SC meeting to discuss and address feedback (intro + Standards 1.1-1.5)
- ➔ • 29 September: update to BFUG Board
- 1 October: ESG SC meeting to discuss and address feedback (remaining standards)
- 21 October: final draft and explanatory note to EHEA secretariat
- 5-6 November: table for approval in BFUG meeting

RESPONSES

17 responses (16 systems + EC)

- Andorra
- Belgium - Flanders
- Czechia
- Finland
- France
- Germany
- Holy See
- Ireland
- Norway
- Poland
- Slovenia
- Spain
- Sweden
- Switzerland
- UK England
- UK Scotland
- European Commission

GENERAL COMMENTS

- Overall appreciation on progress
- Contradictions: Some criticisms that the standards and guidelines are too detailed, risk increased administrative burden. In parallel, many suggestions to add new requirements or more detailed text.
- Some comments revisit issues already decided upon
 - Focus on learning, teaching and assessment (with relevant links to other institutional missions, but no direct requirements for research e.g. research resources, research staff)
 - Specific inclusion of artificial intelligence
 - Explain scope in the introduction and do not repeat throughout the standards (e.g. cross-border higher education, definitions of institutions, programmes etc)
- Thorough language check, including:
 - QF-EHEA should refer to cycles not levels (but levels when referring to EQF)
 - Consistency in language for guidelines (take out descriptors 'it is important..', do not use 'should')
 - 'Programmes' instead of 'study programmes'

INTRODUCTION

- Review wording in foreword for accuracy regarding the history and authors of ESG, and development of 2027 version
- Addition of 'sustainable solutions for global challenges' to reflect sustainability as a contextual issue
- New wording to explain the scope of EQA activities that come under the ESG
- Change from 'future careers' to 'careers' (to cover LLL etc)

INTRODUCTION

- Addition of ‘meaningful’ in description of quality: ‘Quality is mainly a result of the meaningful interaction between teachers, students and the institutional learning environment’
- Addition of ‘services’ to the learning environment ‘Quality assurance should ensure a learning environment in which the content of programmes, learning opportunities, services and facilities are fit for purpose...’
- Edits to list of key terms
 - Remove ‘joint programme’ (not used in ESG)
 - Refer to ‘cycles’ not ‘levels’ of QF-EHEA
 - Edit reference to micro-credentials

I.1 Policy for quality assurance

- Recognition that the list of fundamental values is not exhaustive: ‘safeguarding fundamental values, including but not limited to...’
- Maintain reference to artificial intelligence

I.2 Design, approval, monitoring and review of programmes

- Addition of link to research: ‘programmes... are informed by the latest research, academic and professional developments’
- Addition of active citizenship to balance reference to employability: ‘programmes respond to the needs of students, society and the labour market, supporting graduates’ employability and active citizenship.’
- Maintain wording ‘Students are equal partners...’

1.3 Student-Centred learning, teaching and assessment

- Add 'transparent' to the provisions on the use of AI
- Review the guidelines related to QA processes for student assessment
 - Change order to be more logical
 - Ensure relevance for continuous assessment, not just final exams
 - Add 'personalised' feedback for students

1.5 Teaching staff

- Move the sentence about 'evolving role of staff' to guidelines and expand with examples (SCL, digitalisation, internationalisation)
- Replace sufficient with appropriate: 'an appropriate share of core staff under long-term employment'

PART I REMAINING KEY ISSUES FOR DISCUSSION

I.8 Public information

- Comments on the wording of requirement to publish relevant outcomes of QA processes.

I.9 Cyclical external quality assurance

- The sentence on meeting regulatory requirements is ambiguous
- Several comments on the guideline about publishing SERs
- Wording on EQA focusing on different organisational levels is ambiguous

PART 2 KEY ISSUES FOR DISCUSSION

2.1 Addressing internal quality assurance

- “the different applicable quality assurance processes for each institution” could be phrased more clearly
- Several comments on the requirement for EQA to check QF-EHEA levels

2.3 Implementing processes

- Add ‘transparent’ to provisions on use of AI (parallel to 1.3)
- Could add a point on consistency at national level and across borders
- Clarification of participation of stakeholders in site visit as interviewees (not panel members – that is covered in 2.4)

PART 2 KEY ISSUES FOR DISCUSSION

2.4 Peer reviewers

- Review the wording around training of experts

2.6 Processes and criteria for outcomes

- Review the wording and clarify intention around publication of additional documents

2.7 Complaints and appeals

- Comments about the requirement for the structure for appeals being within the agency

PART 3 KEY ISSUES FOR DISCUSSION

3.1 Activities, policy and processes for quality assurance

- Several comments about the requirement to distinguish between and communicate about ESG and non-ESG activities.

Former 3.2 Official status

- Three countries requesting its re-insertion

3.5 Internal quality assurance and integrity

- Review the content to ensure everything is covered and is in the right place (right standard, and logical order)

REVISION OF EUROPEAN APPROACH

- Summer 2026: targeted consultation with key stakeholders
 - Comments from European Commission
 - Feedback from students
 - Consultation session with QA agencies that use the EA
 - Consultation with HEIs that offer joint programmes
- Until 21 October: Drafting Group and Steering Committee working on document based on comments received
- 21 October: Draft I and explanatory note to EHEA secretariat
- 5-6 November: Discussion in BFUG meeting
- February 2027: Table for approval in BFUG meeting



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