From International Commitments to Institutional Reality – The Case of Higher Education Policy in Europe

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Declaration

I, the undersigned Simona Torotcoi, candidate for the degree of Doctor of Philosophy at the Central European University Doctoral School of Political Science, Public Policy and International Relations, declare herewith that the present thesis is exclusively my own work, based on my research and only such external information as properly credited in notes and bibliography. I declare that no unidentified and illegitimate use was made of work of others, and no part the thesis infringes on any person's or institution's copyright. I also declare that no part the thesis has been submitted in this form to any other institution of higher education for an academic degree.

Simona Torotcoi
Budapest, 2020

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Abstract

This dissertation explores the topic of higher education policy implementation in a multi-level voluntary governance setting, the European Higher Education Area (EHEA)[1]. The EHEA and its predecessor, the Bologna Process, have been recognized as an unprecedented regional cooperation initiative in the field of higher education, with participating countries commonly agreeing on higher education reforms to be implemented nationally (e.g., degree cycles, recognition, mobility, quality assurance, student centered learning). Implementation reports have shown that despite the explicit commitment of national representatives, the same pressure, principles, arguments, and narratives they are all exposed to, the implementation of these reforms is uneven across the participating countries. This is not "puzzling" in itself. As in the case of any large and complex 'policy package', divergence is the norm. There is no example of full compliance achieved with identical implementation tools in any international agreement - especially a voluntary one - where there are no supranational/international agents with stronger competencies and possibilities for enforcement.

Analyzing the diverse literature on the implementation of these reforms, it was revealed that (1) implementation as a term is used broadly to denote a variety of stages of compliance; (2) country case studies, which look very generally at what facilitates or obstructs the implementation of the Bologna Process (BP) dominate, (3) there is little done on comparing different countries and policy areas at the higher education institutions' level; and, last but not least, (4) currently there is no theoretically grounded and methodological sound explanation for different implementation levels across the participating countries but a collection of multi-factors influencing implementation. Considering these trends, this dissertation asks: *What are the factors explaining the different levels of implementation of higher education policies within the Bologna Process?* First of all, this dissertation seeks to address this particular research gap by focusing on specific policy areas within the BP, diverse country contexts and higher education institutions within such contexts. Secondly, it aims to contribute to the broader policy implementation literature by providing a conceptual understanding of policy implementation, breaking it into *adoption*, *transposition* and *practical implementation*. Furthermore, this study puts forward an innovative integrated analytical

[1] In 1999, when the Bologna Process was officially launched, the Ministers of Education committed themselves to achieving the creation of an EHEA by 2010.

framework and a corresponding set of factors for each of the three implementation stages, and empirically tests them in the above-mentioned contexts.

In line with the proposed analytical framework, the dissertation argues that when explaining implementation there is a need to look at 1) the policy to be implemented – in this dissertation social dimension (SD) and quality assurance (QA) within the BP; 2) the specific country contexts and higher education systems - in this dissertation Moldova, Romania and Portugal were selected as diverse cases; and 3) the characteristics of individual higher education institutions in those countries – in this dissertation several higher education institutions across the three countries.

The dissertation hypothesizes three causal mechanisms for each of the implementation levels. Firstly, is hypothesized that adoption is the outcome of a policy fit between commonly agreed policies at the BP level and national preferences and interests, as manifested through national representatives' participation in BP. This causal model predicts that if BP policies have the support of top domestic actors and structures, this may push the national policies closer to the ones promoted by the BP. As a result, BP structures (e.g., working groups) prefer to collaborate with those domestic actors who are in favor of its policies. Secondly, specific to the transposition stage it can be hypothesized that mutual learning and other socialization processes equip governmental agencies and bodies, societal actors, and the academic community with information about the main developments at the EHEA level and contribute to national level policy-making by affecting the choices of national policy makers for specific policy instruments and implementation mechanisms. Thirdly, at the HEIs level, rectors and top-managers, academic and administrative staff, and also students develop institutional plans and policies in line with the national level policies or the BP, depending on their participation as stakeholders in the policy-making processes, and the added value of the policies in question for HEIs' institutional development.

The analysis is based on a set of 68 semi-structured interviews conducted between October 2017 – June 2018 with top higher education decision-makers, governmental representatives and agencies in the field, higher education experts and professionals, national student unions and other affected groups, higher education institutions' leaders and managers, professors, student representatives, staff and other administrative units. Besides this, the dissertation makes use of 6 additional interviews conducted with transnational and European level stakeholders, European level experts, professionals, and European level policy networks on higher education.

This research highlights the complex relationship between the BP, national, and institutional policy-making and the importance of national and institutional (interest) structures, actors (coalitions) and processes in the implementation of international commitments. While it is assumed that there is a sequential "filter" when it comes to the implementation the BP commitments, with each level and layer of policy-making preconditioning the following one, this dissertation has shown that this is very much dependent on the policy in question. QA is a rather well-defined and technical area, with clear conceptualizations and operationalizations, with structures and bodies at the European, national and institutional level, whereas the SD is underdeveloped in this respect. HEIs implement QA policies because of the competitive environment they have to operate in but also because of the existent monitoring mechanisms (at the institutional, national and BP level). The SD is a rather unstructured and more sensitive area, with most of the universities putting forward their own preferred approaches on how to deal with such issues. If in the case of QA in most of the countries there is a national level agency, which pushes for implementation at the HEIs level, in the case of SD the situation is loose. Given such differences between these policy areas, the corresponding implementation "filters" are different, therefore the different levels of implementation.

This dissertation also revealed the extent to which HEIs react to national and transnational (BP) policies given their autonomy and institutional preferences. Looking more broadly at HEIs behaviors within the BP, it can be stated based on the research for this dissertation that their participation is rather minimal and their engagement with the BP usually takes place through transnational structures rather than the national level delegations and structures. This poses further challenges for implementation, since HEIs become "passive" recipients and targets of national and BP policies despite their own agentic capacities.

Table of Contents

Glossary

Concept	Working definition
Adoption	Refers to the incorporation into national laws and regulations of specific policy provisions, or directives by participating countries.
Compliance	Enactment of higher education policies that act in ways that are consistent with the goals and objectives intended by the policy makers.
Transposition	The translation of an objective, goal into operating guidelines and/or specific policies.
Implementation	Stage of policymaking through which adopted policies are put into effect. It is situated between the formulation of a policy and the (un)intended outcomes of that policy.
Policy convergence	A coming together of two or more distinct entities or phenomena. The act of increasing similarity between the policies of different countries or institutions.
Action line/ Commitment	A course of action seeking to address a goal or an objective, in order to redress policy problems, create or improve policy.
Transfer	A process by which knowledge about policies in one sector or as proposed by one model is used for the development of policies at another model.
Participating countries	Bologna Process member countries and associate members.
Quality assurance (QA)	All the policies, ongoing review processes and actions designed to ensure that institutions, programs and qualifications meet and maintain specified standards of education, scholarship, and infrastructure.[2]
Internal quality assurance	Institutional policies targeting the quality of institutions, degrees (including joint degrees, cross-border higher education), programs, including aspects related to the design of study programs, their objectives and learning outcomes and obtained qualifications.
Social dimension (SD)	Policies aiming at equality of opportunities in higher education, in terms of access, participation and successful completion of studies (e.g., studying and living conditions, guidance and counselling, financial support).[3]
Communiqué/Declaration	Policy documents at the Bologna Process setting the main action lines to be implemented at the national and institutional level.
Implementation outputs	The volume of legislation and administrative acts and institutional level higher education policies produced (adopted) over a certain period of time.
Implementation outcomes	The actual results caused by implementation outputs.

[2] *Quality Assurance 2007-2009.* The European Higher Education Area. Retrieved March 20, 2020, from http://www.ehea.info/pid34784/quality-assurance-2007-2009.html

[3] *Social Dimension 2007-2009.* The European Higher Education Area. Retrieved March 20, 2020, from http://www.ehea.info/pid34785/social-dimension-2007-2009.html

List of Tables

List of Figures

List of Abbreviations

A3ES - Agency for Assessment and Accreditation of Higher Education in Portugal

AG - Ad-Hoc Working Group

ANACEC – The Moldavian National Agency for Quality Assurance in Education and Research

ANOSR - National Alliance of Student Organizations in Romania

ARACIS - The Romanian Agency for Quality Assurance in Higher Education

BFUG - Bologna Follow-up Group

BP – Bologna Process

CIPES – The Centre for Research in Higher Education Policies

CNOSM – The Moldavian National Council of Student Organizations

CoE - Council of Europe

CRUP - Council of Rectors of Portuguese Universities

CTNM – National Youth Council Moldova

DGES - General Directorate of Higher Education

EC - European Commission

ECTS - European Credit Transfer System

EHEA - European Higher Education Area

ENQA - European Network of Quality Assurance in Higher Education

ESU - European Student Union

EUA - European University Association

EURASHE - European Association of Institutions in Higher Education

HE – Higher Education

HEI – Higher Education Institution

IVA – International Voluntary Agreement

LRC - Lisbon Recognition Convention

OMC – Open Method of Coordination

QA – Quality Assurance

SCL - Student Centered Learning

SD - Social Dimension

UEFISCDI - The Executive Agency for Higher Education, Research, Development and Innovation Funding

WG - Working Group

Introduction

There has always been an interest in exploring compliance and implementation of international treaties and laws from either the perspective of the involved actors, the process itself and its analysis, trends in development, or the issues the key stakeholders face. However, only recently has the topic of the implementation of international voluntary agreements (IVAs) sparked academic interest[4]. For example, in the field of European integration several scholars have been exploring member states' compliance with EU soft law (Senden, 2004; Falkner et al., 2005). An area in which there is clearly a high scholarly interest in studying compliance with IVAs is environmental policy (e.g., the Kyoto Protocol, the Copenhagen Agreement) (Blackman et al., 2012; Croci, 2005). IVAs can have different shapes (e.g., public schemes, multi-stakeholder agreements) and sizes (regional level agreements – e.g. macro-regional cooperation initiatives; state level agreements – e.g., OSCE). IVAs are tools through which parties assume "obligations" among themselves, which are not legally binding, and engage in different convergence, cooperation, or harmonization processes in order to achieve integration or create a common ground framework in that respective policy area.

Enacting policies that are consistent with the goals and objectives intended through IVAs represents a starting point for the members of those agreements to express their commitment towards those aims. In counterpart to the simple agreement on, or adoption of, international documents, the lack of actual policies at the national level, despite the commitment to similar objectives and standards results in different implementation outputs, outcomes or underachievement of the intended goals. This was the case, for example, with the Millennium Development Goals as an IVA. The question why countries are presenting different levels of implementation with regards to commonly agreed IVAs is a foundational one for both policy analysts and political scientists. This question will be addressed in the current study with the aim of contributing to the understanding of policy implementation as a more general policy phenomenon, for which higher education (HE) policy – the Bologna Process - is used as a specific area. Despite broad similarities across participating countries and the same goals of harmonization and policy convergence, the BP presents different implementation outputs across countries and

[4] For a discussion on the difference between compliance and implementation see section 4.1.

universities, as revealed through numerous reports and dedicated scholarly literature. This dissertation aims to articulate conceptually and unravel empirically the factors leading to such varying implementation performance.

Very often, IVAs involve integration aspects. This is certainly true for the BP (Furlong 2011; Veiga, A., Magalhães and Amaral, 2015). Due to their non-binding nature, IVAs provide fertile ground for exploring what drives the differentiated integration aspect (Holzinger and Schimmelfennig, 2012) – that is, the territorially fragmented validity of commonly agreed rules and behaviors in an international setting. First, the differentiated aspect comes from the flexibility of the system, which permits such rules not to be applied in certain contexts. However, this phenomenon is not only about the validity of the rules but also about the ability and eagerness of the actors to participate in the desired integration process (Andersen and Sitter, 2006). Scholars have put forward different types of differentiated integration. For example, Holzinger and Schimmelfennig (2012), based on a series of criteria –whether differentiation is temporal or permanent, whether it is functional or territorial, etc. - came up with around ten types of differentiated integration, ranging from multi-speed, multiple standards to flexible cooperation[5]. In a similar fashion, Schimmelfennig, Leuffen and Ritberger (2015, p. 765) coined the terms *vertical* and *horizontal differentiation*. Vertical differentiation refers to cases in which a policy area has been integrated at different speeds and reached different levels of centralization over time. Horizontal differentiation relates to the territorial dimension and refers to the fact that many integrated policies are neither uniformly nor exclusively valid in the concerned policy contexts, that is they may stand beside one another and express different approaches to the policies.

Policy implementation scholars have offered several explanations for diverging compliance outcomes by putting as main variables the salience of the policy, its design and governance system, but also the institutional arrangements and resources needed for operating that policy, including the will of the responsible bodies. However, currently there is no generally agreed theory of implementation. The existing literature offers only a collection of multi-factors influencing implementation (Howlett, 2018; Hrebiniak, 2006; Spillane et al., 2002; Mazmanian

[5] For example, multi-speed differentiated integration suggests an increasing degree of flexibility in the integration process, with participating countries being allowed to move at a different pace towards the common goals. Multiple standards imply that different groups of participating countries will have to comply with a different set of standards. Flexible cooperation or integration flexible integration are used interchangeably to refer to the different refers to the different modes of integration adopted by participating countries.

and Sabatier, 1981; Pressman and Wildavsky, 1974; Hjem and Hull, 1982; Montjoy and O'Toole, 1979). Differentiation comes somewhat as unexpected if one considers that all participating actors have agreed on the respective policies and expressed their willingness and commitment to implement them. In addition, the nature of the IVAs result in that all signatories are all exposed to the same principles, arguments and narratives, and the same pressure from the in-place governance structures and/or peers. However, as in the case of any large and complex 'policy package', divergence is the norm. There is no example of full compliance achieved with identical implementation tools in any international agreement, and especially in a voluntary one, where there are no supranational/international agents with stronger competencies and possibilities for enforcement.

European integration and Europeanisation scholars have provided different reasons for different policy implementation outputs, including the governance system at hand (Falkner et al., 2005), the specificities of the national contexts (Schimmelfennig and Winzen, 2017), the governance arrangements (e.g., multi-level governance settings – international, national/regional, and institutional) and the chosen policy instruments and tools (Ágh, 2014), and their impact on creating a shared understanding and common policy practices (e.g., normative-ideational factors - Holzinger and Schimmelfennig, 2012). Other studies link variation in implementation across policy sectors and countries to differences in member states institutions, their capacities and willingness to be engaged in new policy processes, their policy-making traditions and heterogeneities (Knill and Lenschow, 1998), and the degree of change and resources the policy in question entails (Andersen and Sitter, 2006). Given the non-binding aspect of IVAs, member countries have the discretion to slow down or even neglect the transposition and practical implementation phases. In a similar fashion, assuming the legal framework is in place at the national level, the lowest level implementation institutions might choose to adapt or adjust to the new policies pretending to align their behavior with the prescribed rule or change their behavior in superficial ways that leave the intended objective intact. This is certainly the case in higher education (Batory, 2016). It can be claimed that differentiated integration is multi-leveled: it happens across countries, but it also "happens within them and among components belonging to different states that connect to each other and/or to the European level" (Fumasoli, Gornitzka and Leruth, 2015, p. 1).

By using the case of higher education policy in Europe, a policy sector which presents high levels of differentiated integration (c.f. Veiga, Magalhães, and Amaral, 2015), this dissertation aims to explore what drives the different levels of implementation across the BP countries/EHEA[6].

Criticized by many, praised by others, the BP is a voluntary agreed, collective and intergovernmental effort to strengthen the competitiveness and attractiveness of the European HEsystem by helping the existing diverse systems to converge towards more transparent systems and create a harmonized European higher education area (Garben, 2010). It is widely accepted that the BP (currently consisting 48 European countries) is a *sui generis* phenomenon. This idea of uniqueness has been portrayed from different perspectives, looking either at the voluntarist character of the process, its mode of governance, its bodies and ways of functioning, and its legal basis (Elken et al., 2011; Erdoğan, 2015). The most notable characteristics of the BP are "the apparent informality of the processes, the co-option of membership, the reliance on flexible shared targets for intermediate objectives, the common culture of policy learning and the emphasis on continual enhancement to drive reform" (Furlong, 2011, p. 19). The BP reflects the liberal intergovernmentalism (Moravcsik, 1998) phenomenon, which perceives participating countries as central actors in the integration process behaving like rational actors pursuing their own interests, but accepting the idea of a shared soft sovereignty.

"The Bologna Process represents an unprecedented, ambitious and original European initiative" claims Matei (2014) with the occasion of Bologna Process Researchers' Conference. Among many others, he claims that the uniqueness of the BP stands in its ability to create "a European space for dialogue in higher education" and "a platform to inform decision-making and stimulate and support practical action in HEat the European, national and institutional level". The BP has a few action lines, or sub-policy areas, such as: the adoption of a system of easily readable and comparable degrees; a two cycles system; a system of credits; mobility; European cooperation in quality assurance; lifelong learning; doctoral studies and the synergy between the EHEA and the European Research Area, etc. (Terry, 2007). Like in most IVAs, the BP reports and studies have shown that even despite the explicit commitment of national representatives with regards to

[6] Recently there is an increasing emphasis on regional integration projects which, among many others, engage in different policy convergence and harmonization processes including cooperation in higher education as a way to overcome globalization challenges. Initiatives from the MERCOSUR, the ASEAN group, from the African Union or the European Higher Education Area (the Bologna Process) are a few examples of the macro-level situation.

the BP reforms, the implementation of these reforms is uneven (Sin, Veiga and Amaral, 2016) for the Process as a whole, across countries and policy areas.

Implementing Higher Education Policy in Europe

In recent decades, it has been shown that there is a growing interest in assessing the level of implementation of the BP policies and their impact at the national level[7]. Much of the interest in research has been stimulated by the Europeanization of HE and the extent to which HE has become subject to European decision-making, impacting therefore the domestic politics and higher education systems (Vukasovic and Huisman, 2018). From outside Europe, the interest has been triggered by the potential of the BP project to serve as a policy model for other regions (Zmas, 2015). Much of the current debates around the BP refer to the implementation process, its harmonization and policy convergence outcomes (e.g., Dienel, 2019), and the dichotomies around it: national versus supra-state interests, the social vs the economic role of HE, etc. (Keeling, 2006; Hackl, 2012).

Notwithstanding its legally non-binding and strong intergovernmental character, participating countries have implemented many elements of the BP. Implementation studies have shown that indeed participating countries move in the same direction, however they do so at varying degrees and paces (Heinze and Knill, 2008). The 2015 Bologna Implementation Report claims that the European Higher Education Area (EHEA) is moving towards a "more common and much more understandable structure of degrees", with almost half of the participating countries making "substantial progress in implementing national qualifications frameworks" (Bologna Implementation Report, 2015, p. 17). Moreover, "the use of learning outcomes in curriculum development has grown substantially" (p. 18) and substantial developments took place with regards to recognition and quality assurance. Sursock, Smidt and Korhonen (2011) show that quality assurance, internationalization, governance, and funding reforms are the most frequent developments, whereas in terms of social dimension, lifelong learning (LLL), mobility and employability the participating countries present very different situations.

A closer look at the existing implementation reports shows that there is a lot to be done to achieve the full implementation. There is uneven implementation of specific policies within individual countries and across countries and regions (e.g., see Veiga, Amaral and Mendes (2008)

[7] See Chapter 2

for Southern European countries). The implementation performance of BP policies cannot be categorized based on a Western Europe – Central Eastern Europe distinction, HE system or governance type. In short, there is no clear pattern of implementation given the existing similarities across different HE systems in Europe (for example, for the three broad models for European universities: Humboldtian, Napoleonic and Anglo-Saxon). The different levels of implementation across the participating countries affect the desired BP end goals of "full harmonization" and policy convergence, in other words to make the European HE systems "more alike, to develop similarities in structures, processes and performances'' (Heinze and Knill, 2008, p. 498). A central theme of this dissertation is to underscore that in spite of great similarities across participating countries and their goal to achieve harmonization and policy convergence, there has been a substantial variation in the BP implementation outputs. This dissertation argues that this variation can be explained by examining the national level implementation processes and their mechanism fostering policy change.

As this dissertation will show, most scholarly work on this subject lacks a theoretically grounded and methodological sound explanation of this empirical puzzle. Looking more broadly at these studies, it can be claimed that they predominantly look at the implementation of those policy areas which are more technical, with formal guidelines for implementation or at least some more clear provisions, and some bodies or agencies which facilitate implementation. While country case studies, which look very broadly at what facilitates or obstructs BP implementation (overall) dominate, a review of the literature also shows that there is little done at the higher education institution (HEI) level and on comparing different countries and different policy areas. In short, no study has built a theoretical framework and/or compared different national conditions and contexts in order to explain the variance in implementation across countries, institutions and policy area, and the necessary and sufficient conditions for implementation. This dissertation undertakes to fill this gap building on policy implementation theories, EU integration studies and HE research.

Research Gap and Justification

Taking into consideration that both BP implementation reports and academic sources show that there is systemic variation in terms of compliance across different participation countries but also across different levels and forms of compliance, this dissertation aims to provide answers to the following question: *What are the factors explaining the different levels of implementation of*

higher education policies within the Bologna Process? In other words, this dissertation aims to explore what factors account for the variation in implementation and whether they hold across policy areas and countries (old and new participating countries, EU and non-EU participating countries, countries with different socio-economic and political contexts). Here, *implementation* refers to the stage of policy making through which the status quo is changed and policies are put into effect. It is operationalized as adoption, transposition and practical implementation.[8]

The BP is considered a policy model (conveyed through common commitments) which is used for the development of national policies (Matei, Craciun and Torotcoi, 2018; Powell and Finger, 2013), first by adopting the necessary legislation which provides a legal framework for addressing the policy issue at hand. Once the necessary legal framework is adopted at the national level, the next step for the competent authorities is to translate these policy provisions into operating guidelines, action plans and strategies, etc. The final implementation phase refers to the stage in which these policies are put into effect at the HEIs' level. In other words, it refers to the practical implementation European integration scholars talk about when referring to the establishment of the necessary agencies, tools and instruments, monitoring and compliance mechanisms at the lowest institutional level (Versluis, 2007, p. 53). Based on the above multiple dimensions of implementation and the variables affecting it (Robichau and Lynn, 2009), this dissertation will structure the analysis in two levels: countries as units of analysis (adoption and transposition) and HEIs as sub-levels of analysis (practical implementation).

The uneven implementation outputs across the BP, combined with the specificities of the national HE systems and institutions, suggests that a multiple comparative study design is an effective way to explain the differentiation in implementation of agreed upon policies. The three countries examined in this dissertation, each of which present different implementation levels within the BP, are Portugal, Romania, and Moldova.

Firstly, these cases provide fertile ground for exploring whether the time period a country has been part of the BP matters in the implementation outputs (Holzinger and Schimmelfennig, 2012). This is in line with the sociological institutionalism argument which contends that with time participating countries acquire knowledge about the rules and procedures and internalize its

[8] See (Jentoft, 2014) for a similar approach for explaining environmental agreements implementation; or Toshkov (2011); Dimitrova and Steunenberg (2017) in EU studies.

principles, which further helps navigating better through the system. Both Portugal and Romania joined the process in 1999, whereas Moldova in 2005.

Secondly, the three cases allow exploring the role of the European Union (EU) institutions and agencies in "interfering" within the BP and the use of their instruments in enhancing certain policy areas (Huisman and Van der Wende, 2004; Batory, 2016; Dakowska, 2017) (e.g., funding supporting the development of related QA projects). The three countries have different experiences with the EU both time-wise and policy-wise: Portugal became a member of the EU in 1986 (with time it internalized EU's principles and policies – i.e., deeper integration), Romania in 2007 (it had to catch up with EU's policies and had to adjust many of its operational sectors and governance structures), whereas Moldova signed the association agreement in 2014 as a non-EU member and thus it is not directly exposed to EU's policies.

Thirdly, compared to other regions the EHEA is an exceptional multi-level governance context comprising of at least three different levels: supranational, national and institutional. Many studies have argued that an analysis at the regional level of the BP has been lacking despite the fact that countries with similar cultural, economic and political conditions, such as Romania and Moldova, are more likely to lead to policy coordination/convergence/ transfer (Heinze and Knill, 2008; Elken and Vukasovic, 2014).

Last but not least, the different socio-economic and political dynamics participating countries present (Dakowska, 2017; Triventi, 2014), the contexts in which HE policy-making takes place, and the type of (higher) education systems represent core dimensions in exploring what matters for complying and implementing the BP agreed commitments. Romania, Moldova and Portugal illustrate well such differences.

Besides country and HE specificities factors, a second set of explanatory factors for the HE policy implementation variation is the nature of the policy in question: its political salience, how clear or abstract it is conceptualized and the degree of change and resources it entails (Hrebiniak, 2006). This dissertation focusses on two different policy areas promoted by the BP, quality assurance (QA) and the social dimension (SD). The preference for these two policy areas has been triggered by the fact that they both constitute BP fundamental commitments. Quality assurance is one of the original foundations of BP, whereas the social dimension came on the agenda later on. Both represent different rationales for the BP: quality assurance was a top down approach

(supranational actors and governments leading the agenda), whereas the social dimension came later on (2001) and it was brought on the agenda by the students.

The dissertation relies on a dataset of 68 semi-structured interviews conducted starting from October 2017 to June 2018. The core is 62 interviews (Moldova – 17 interviews, Portugal – 17 interviews, Romania – 28 interviews) with top HE decision-makers, governmental agencies in the field, HE experts and professionals, national student unions and other affected groups, top HEIs' leaders and managers, teachers, student representatives, staff and other administrative units. The remaining interviews include European level experts, professionals, and European policy networks in HE (e.g., European Students Union). Interviewees were asked about their understanding of the BP and how familiar they are with it, how they have been contributing (or not) to creating a shared understanding and implementation QA and SD policies at the BP, national or institutional level, what they consider as main challenges and opportunities in implementation, etc. (see Annex 3 for an interview guide for each category of interviewees).

Structure of the Dissertation

In order to answer the question of *what are the factors explaining the different levels of implementation of higher education policies within the Bologna Process?,* the dissertation is structured as follows. A first part which sets the methodological and analytical approaches (Chapters 1-4). The second part (Chapters 5-7) is the empirical analysis of the case studies. Chapter 1 expands the current introductory section and reflects upon the grounds for cooperation in HE in Europe. It then provides a brief account on the emergence of the BP as a voluntary initiative, its governance structures, and the policies it promotes. This will be the basis for developing the analytical framework and the empirical analysis. The chapter proceeds with an analysis on how these policies – or action lines - have been defined, how they evolved, and identifies two key observations. First, there are action lines which are not clearly defined and operationalized and create confusion when compared with each other. The second observation refers to the fact that there is a strong (inter)dependency relationship between some of these policies. The lesson from the two observations is that having both unclear and interdependent policies generates highly relevant implications for implementation.

Chapter 2 provides a review of the literature concerned with the implementation of the BP within the European Higher Education Area: official documents, policy reports and academic studies (looking at the mode of governance, developments, path and speed of implementation, and

the factors contributing or obstructing implementation). The findings of the review show that despite the increasing volume of studies in this area there is no theoretically grounded and methodological sound explanation for different implementation levels across the participating countries and HEIs. However, the existing studies provide useful insights into the state of the art of the BP implementation and they also shed light upon the different factors which account for certain implementation outputs or patterns. The chapter concludes with a summary of the existing theoretical approaches and factors that could contribute to explaining the various degrees of policy implementation across countries and HEIs.

Chapter 3 presents the research design employed. It first reiterates the uneven implementation of the BP as presented in the main implementation documents and proceeds towards justifying the choice for the research design. The section continues with providing an account of the choice of the policy areas examined in this dissertation, the main rationales for the country case selection and the choice of HEIs in these countries. In order to enhance the transparency of the data collection process, the section provides further details on the interviews and the main themes addressed.

Chapter 4 addresses the existing knowledge gap in researching HE policy implementation within the EHEA and puts forward an integrated analytical framework for understanding the different factors facilitating or obstructing policy implementation. Grounded in implementation theories and backed-up by existing research on European integration, policy change and policy transfer, the proposed framework makes use of existing research on the BP implementation, but also on related initiatives and processes functioning in a somewhat similar way to the BP (e.g., international voluntary agreements in the field of environmental protection). The framework differentiates between three stages of implementation: adoption, transposition and institutional implementation, corresponding to different levels/degrees of implementation at the national and institutional level.

The framework aims to build a more appropriate approach for researching different implementation outputs. The chapter puts forward three main hypotheses regarding mechanisms fostering policy change in line with the BP. Firstly, it hypothesized that adoption is the result of policy fit between commonly agreed policies at the BP level and national preferences and interests, as manifested through national representatives' participation in BP. This causal model predicts that if BP policies have the support of top domestic actors and structures, this will push the national

policies closer to the ones promoted by the BP. Secondly, specific to the transposition stage it is hypothesized that mutual learning and other socialization processes equip governmental agencies and bodies, societal actors, and the academic community with information about the main developments at the BP level and contribute to national level policy-making in thus way, by influencing national policy makers. Last but not least, at the HEIs level top-managers, academic and administrative staff, and students develop institutional plans and policies in line with the national level policies or the BP depending on their participation as stakeholders in the policy-making processes, and the added value of the policies in question for further institutional development.

The following three chapters (Chapters 5 to 7) are dedicated to answering the research question by focusing on each of the three implementation stages. Chapter 5 is focusing on adoption. It begins with a short overview of the context in which the countries under consideration joined the BP by pointing out the motivations they had to join the BP, as an important factor to pursue reform. The chapter proceeds with a summary list of the major SD and QA reforms as an indicator of the adoption and transposition performance of the countries under consideration within the BP. Further, the chapter focuses on the countries' engagement with the overall process, their participation in the BP governance structures, and the opportunities these have created for uploading their policy preferences onto the BP agenda. It looks at key decision-makers and country representatives in the BFUG and its working groups. The chapter assesses whether the incorporation of implementers and target groups (HEIs and students) into the decision-making processes at the BP level and their support affects the adoption of the QA and SD policies. It positions some of the key supranational and transnational HE actors within the BP and the main mechanisms at work with regard to their members at the national level. The last two sections concentrate on governments preferences with regards to the policies to be adopted.

Chapter 6 focuses on transposition. It first examines domestic actors' input and participation in national level policy making (e.g., participants in the BP working groups, national experts participating both at the supranational and national level policy-making processes, the wider HE community and student representatives) and the organizational socialization practices they engaged in. It then assesses the decision-making authority, discretion, and capacity that implementing organizations have with regards to policy transposition and further implementation.

Chapter 7 focuses on the practical implementation at the HEIs level. It seeks to unbundle the BP policy-making processes in several HEIs from the three countries under consideration. As an indicator of HEIs' performance with regards to QA and SD policies, the chapter provides a summary table presenting the major reforms undertaken by the universities studied. Further, the chapter discusses the policy-making context at the HEI's level and their relationship with the BP and the main national level policy-making processes they are subject to. The chapter explores the role of institutional leadership (rectors and top managers) in setting their institutional agenda and the necessary mechanisms for policy implementation and implementers familiarity with the policy goals. The section focusses on different university structures with competence in QA and SD at the university level (e.g., internal QA commissions, student organizations and different student support services).

Lastly, the dissertation brings together the different proposed factors and concludes with a discussion on the utility of the proposed analytical framework.

1. The Bologna Process: Setting the Ground for European Cooperation in Higher Education

This chapter expands the introductory section and reflects upon the grounds for cooperation in higher education in Europe as part of the BP. It then provides a brief account on the emergence of the BP as a voluntary initiative, its governance structures, and the policies it promotes. The chapter proceeds with an analysis on how these policies – or action lines - have been defined, how they evolved, and identifies two observations. First, it points out that there are action lines, which are not clearly defined and operationalized and are confusing when compared with other action lines. The second observation refers to the fact that there is a strong (inter)dependency relationship between some of these policies. Having both unclear and interdependent policies generates highly relevant implications for implementation.

1.1. Governing Higher Education in Europe

Under conditions of hierarchical modes of governance in Europe, with complex and centralized steering mechanisms and a series of issues with regards to efficiency, effectiveness and legitimacy, almost three decades ago new modes of governance (NMG) emerged and have been more explicitly manifested as a way to compensate the rigidity of EU policy-making. Among these, the open method of coordination (OMC) and the use of international voluntary agreements (IVAs) are the clearest rxamples (Regent, 2003; Gornitzka, 2006). As defined by Hirsch and Weber (2001, p. 8), governance refers to the "formal and informal exercise of authority under laws, policies and rules that articulate the rights and responsibilities of various actors, including the rules by which they interact". The main rationale of the NMG was to safeguard some of the policy areas in the hands of national governments or other such units, and to emulate the approach of existing successful organizations by promoting greater diffusion and learning across the participating actors. For example, IVAs (as an illustration of NMG) are tools through which parties assume "obligations" among themselves and engage in different convergence, cooperation, or harmonization processes in order to achieve integration or create a common ground framework in that respective policy area. Enhancing policies that act in ways that are consistent with the goals and objectives intended by the policy makers in IVAs, represents a starting point for the members of that agreement to express their commitment towards those aims. The absence of in-line policies

at the national level, despite the similar standards, results in different outputs or underachievement of the intended goals.

In recent decades, Europe' higher education systems have been undergoing a major transformation, shifting away the traditional mode of governance towards the NMG (Middlehurst and Teixeira, 2012; Harmsen, 2015). A reflection of this phenomenon is the emergence of the Bologna Process – a voluntary agreed, collective and intergovernmental effort to strengthen the competitiveness and attractiveness of European HE by helping diverse HE systems to converge towards more transparent systems and to create a harmonized European higher education area (Garben, 2010).

The open method of coordination (OMC) adopted to implement the BP is a new soft law procedure assuming policy implementation is a logical and rational top-down linear process (Veiga and Amaral, 2006). Soft law is defined as rules of conduct which have no legally binding force, it is simply used as reference point. However, soft law has practical effects. Applied to the BP it implies that different governments came together on voluntary basis and agreed upon the harmonization of the European HE system and its convergence, and it was left "to each individual government by which means it wanted to meet these goals". The mode of governance of the BP is studied most of the time as one of the possible explanations for the differentiated integration phenomenon in the field of European HE policy (Veiga and Amaral, 2006; 2012).

The debate about OMC is twofold. On the one hand, it is claimed that through it the BP can be seen as one of the most successful recent examples of transnational reform (Van Damme, 2009). On the other hand, it is claimed that the OMC is not an effective mechanism for HE policy when national governments have their national HE policies and priorities; therefore, the OMC might not be the best instrument for European HE policy implementation. Veiga and Amaral (2006) claim that this method presents several problems, which do not allow for a "full" implementation and coherent results. It is argued that the BP is a complex (different national contexts, interests and objectives, time horizons, electoral politics, cultures and histories, etc.), top-down process which involves different policy-making levels (European, national and institutional), and that this leads to implementation problems. Their main argument is that higher HEIs have a certain degree of autonomy which questions the "rational top-down linear process" as the basic assumptions of OMC. Moreover, they argue that since participating countries have their own national HE policies, the use of soft law is not effective, and this is mainly due to a lack of

coordination for a coherent implementation. In sum, as Sin, Veiga and Amaral (2016) claim, soft law mechanisms might produce "integration but in practice generate eclectic, divergent, unpredictable or perverse outcomes" (p. 3).

1.2. European Commission's Role in Higher Education Policy

In Europe, education policy was always under the legal responsibility of member states but shaped by external influences. It is supposed to be a policy field based on the principle of subsidiarity, with no direct interference in the more distinctive features of national systems (such as the structure and content of curricula and the institutional organization of educational systems). According to Corbett (2003), Europeanization in the educational sphere was perceived as something to be avoided, national legacies and traditions being considered as values to be preserved.

Traditionally, education has been seen as an area where the European Community competences have evolved through soft law[9]. Despite this, the European Union is constantly expanding the range of its activities and gradually acquiring political and policy influence in fields which were previously outside of its competence. This trend has been referred to as the 'creeping competence' of the EU (Pollack, 1994) and points to the fact that European institutions are active, if not central, participants in a broad range of policy areas. The Treaty of Maastricht (1992) confirmed through the subsidiarity principle that the main responsibility for HE policies lies at the national level. However, this was not supposed to hinder European institutions from supporting, coordinating or supplementing the actions of member states in this area.

Starting with the late 1980s, the EC developed higher education programs,[10] which aimed at strengthening cooperation between universities and enterprises, promoting student mobility and exchange, encouraging teaching and research in the field of European integration, and even at promoting innovation, equal opportunities in all sectors of education or enhancing the competitiveness of the European labor market. Meanwhile, at the EU level, a white paper dating from 1993, "Growth, Competitiveness and Employment", stated that one of the foundations of the

[9] Soft law refers to those as rules of conduct which have no legally binding force, that is, non-binding regulation does not force or compel concerned targets; it is simply used as reference point, therefore there is no punishment or sanction for breaking this regulation. In general, some of the reasons for utilizing soft law aim to strengthen member states' commitments to their agreements, reaffirm international norms, and establish a legitimate foundation for subsequent treaties (Guzman, 2002).

[10] 1987 COMETT, 1987 Erasmus, 1989 Jean Monnet, 1990 TEMPUS, 1994 Socrates, 1995 Leonardo.

European economies for sustainable development is creating jobs and in order to do so Europe should exploit its assets and non-physical capital among which education is the first.

The BP offers a concrete illustration of the rising influence of European institutions in HE (Keeling, 2006; Corbett, 2012; Dakowska, 2019). The EC was not a member when the BP was started in 1999 and the founders of the Process wanted to keep distance from the EC. The EC, however, given its funding and expertise, acquired a formal role (membership in 2001) in the BP. This is then used for linking BP's objectives to the knowledge society component promoted by the Lisbon Strategy of the EU. By claiming that universities were indispensable component in the knowledge society, in a second step, the Commission confirmed the legitimacy of EU actions in HE, providing external reference, which justifies its increased activity in the tertiary education sector.

Martens et al., (2004) argue that the EC has the power to shape and influence policy-making through its social and cognitive features. As such, they identify three main ways through which the EC influences the preferences of the BP members. The first is about governance by coordination, which refers to "the ability of an international organization to provide the means of organizing and handling procedures which promote certain initiatives in a policy field" (Martens et al., 2004, p. 2). Through this, the Commission acts like an informal agenda-setter and provides "stricter guidance of projects and actions by clearer coordination activities to foster educational policy" (p. 16). This point is also reflecting the choice for the OMC as the mean for ensuring compliance and implementation at the national level (Veiga and Amaral, 2012). The second aspect is governance by opinion formation, which refers to the capacity of the Commission to initiate and influence national discourses on HE issues. "Since the Commission's full membership in the process (…) it has been directly influencing the targets and goals of the undertaking. In particular, it is using its mandate to take the floor for a great amount of time during conferences in order to spread ideas about how to proceed with activities and what to do" (*ibidem*, p. 9). Moreover, the EC also contributes to opinion formation through its memoranda and publications. In the sociological and discursive institutionalism literature, persuasion, deliberation and convincing arguments, represent the most often used strategies in order to influence policy and political outcomes. Last but not least, governance by instruments, a more direct and technical form of governance, which implies that besides the regulations, members are expected to use the available material and financial means (Batory et al., 2011) designated for HE purposes.

1.3. The Emergence of the Bologna Process

The BP emerged in the late 1990s. The roots of the BP started when Claude Allegre, then French Minister for Education, together with his counterparts from Germany, the UK and Italy decided in 1998 to launch a European initiative, a "Joint declaration on the harmonization of the architecture of the European higher education system", otherwise known as the Sorbonne Declaration. Through it, signatory countries (more exactly the ministers in charge of HE) committed themselves to encourage a "common frame of reference, aimed at improving external recognition and facilitating student mobility as well as employability" (Sorbonne Declaration, 1998). It was agreed therefore, to design policies in order to enhance student mobility, to promote the attractiveness of the member states HE systems by facilitating recognition through a system based on two main cycles, the implementation of the ECTS scheme and of the Lisbon Recognition Convention (LRC), the latter aiming to facilitate the recognition of studies including the assessment of qualifications, the recognition of qualifications giving access to HE, and the recognition of periods of study and of HE qualifications.

According to Racké (2006), this voluntary cooperation was triggered by the fact that through it participating countries could address common European problems which otherwise could not be dealt with at the national level. This aspect is also reflected in later reports, where it is stated that signatory countries commit themselves to a European process but use it for national purposes (Kauko, 2012). According to Racké (2006), the BP was initiated outside the EU as ministers wished to maintain full control over the process, and sought to avoid a transfer of competences, or even the threatening standardization of the European HE systems. That is, the BP emerged out of the view that cooperation could deal with common European-wide higher educational problems but would do so recognizing the sovereignty of national interests in the field of education. This is very much in line with the new intergovernmentalism theory which argues that national governments are keen on cooperating in certain fields or policy areas, while at the same time are rather cautious about delegating authority to supranational institutions, favoring to preserve national sovereignty over important aspects (Bickerton et al., 2015).

One year later, in 1999, at an extended follow-up meeting with 29 country representatives (both EU and non-EU member) which took place in Bologna, Italy, this cooperation initiative became known as the Bologna Process. By signing the Bologna Declaration in 1999 the Ministers of Education committed themselves to achieving the creation of a European Area of Higher

Education (EHEA) by 2010[11] through the implementation of specific reforms (see section 1.4. below) in their national HE systems (Reinalda, 2008).

According to the official EHEA website[12], every two or three years there are ministerial conferences organized in order to assess the progress made and to decide on the new steps to be taken. At these conferences, the ministers decide about the central aspects of the EHEA, including its further developments and commitments by its member countries. The various organizational structures involved in the BP provide evidence about the ways decisions are arrived at and implemented, revealing the shifting balance between European-wide expectations and national interests and priorities. Based on ministers' deliberations, each ministerial meeting has produced a declaration or communiqué indicating the new priorities or re-stating older ones[13]. For example, in 2001, through the Prague Communiqué, participating countries were encouraged to create lifelong learning policies, to facilitate the partnership of HEIs and students in promoting the attractiveness of the EHEA, and promote policies aiming at the social dimension of HE, including the access of underrepresented groups. Another ministerial meetings decided on the introduction of stocktaking reports, of the doctoral studies as a third cycle and on the cooperation with other parts of the world (Bergen Communiqué, 2005), on international openness, policies focusing on student-centered learning and the teaching mission of HE, and also on multidimensional transparency tools and funding (Leuven/Louvain-la-Neuve Communiqué, 2009).

Nevertheless, the BP cannot be reduced only to the work done by the Ministers of Education or country representatives participating in the ministerial meetings. Currently (as of 2020) the BP has 60 parties: 48 participating countries (EU and non-EU), the European Commission, 5 partners, 3 technical experts, 5 partners, 9 consultative members. The parties are organized through different structures including a Bologna Follow-Up Group (BFUG), a Board, a Secretariat, different working groups (WGs) and consultative bodies.

[11] After 2010, stakeholders in the process preferred the term EHEA instead of Bologna Process. This was partially driven by the negative reactions of both academics and students to what the process implied at the national and institutional level (e.g., ESU's Bologna Black Book was a midterm review of the bad practices occurring under the guise of implementing the BP). Other scholars preferred to use the terms *Europeanization* or *internationalization* of higher education.

[12] The European Higher Education Area' official website, available at: http://www.ehea.info/

[13] Up to date, besides the ministerial meeting in Sorbonne and Bologna, nine ministerial meetings took place as follows: Prague – 2001, Berlin – 2003, Bergen – 2005; London – 2007; Leuven/Louvain-la-Neuve – 2009; Budapest/Vienna – 2010; Bucharest – 2012; Yerevan – 2015; Paris – 2018, and an upcoming one in Rome – 2020.

As far as the BFUG is concerned, it is the main follow-up executive structure in the BP. It is composed of EHEA members (country representatives), the EC, the Council of Europe (CoE), stakeholder organizations and other institutions whose work contributes to BP implementation (EUA, EURASHE, ESU, UNESCO, Education International, ENQA and BUSINESSEUROPE), and the so-called technical experts (usually providing technical expertise and studies) which are invited to meeting and events upon specific request (Eurostat, Eurostudent, Eurydice). The BFUG usually meets twice a year and oversees the BP and the implementation of the Communiqué between the ministerial meetings. The BFUG is entrusted with overseeing the BP between the ministerial meetings and taking forward matters that do not need to be decided by the Ministers or that have been delegated by the Ministers[14]. It is chaired by the country holding the Presidency of the European Union, and it is supported by the Bologna Secretariat. Among its roles, it can establish working groups which might deal with certain topics more detailed based on Bologna Seminars input[15]. The BFUG, through its Working Groups (WG) and the Ad-Hoc Working Groups (AGs) is responsible of the actual work and of the development of the overall process[16]. The BFUG work is supported by the Bologna Secretariat.

As far as the Board is concerned, its main aim is to prepare the BFUG meetings and therefore it usually meets every six months before the BFUG meetings, overseeing the work of the groups. The BFUG Secretariat is hosted by the country which holds the next ministerial meeting. Its mandate corresponds with the period between the ministerial meetings, and its main aim is to ensure the continuity of the BP reforms by supporting the BFUG and its spinoff bodies[17], by preparing prepares draft agendas and reports, notes or minutes. Besides these, the Secretariat has to provide reliable and current information and data about the progress of the educational reforms within the BP. Among the main tasks of the Secretariat it should be mentioned its administrative and operational support for the BFUG and its Board, and carrying out tasks related to the

[14] The European Higher Education Area' official website, available at: http://ehea.info/page-the-bologna-follow-up-group

[15] Seminars are included in the Bologna Process Work program (elaborated after each ministerial conference and approved by the BFUG and aim to address specific action lines) for the inter-ministerial period.

[16] From a practical point of view, a working group on implementation has been formed for the 2015-2018 period under the name "Fostering implementation of agreed key commitments", with the aim of supporting the implementation of the agreed goals through peer learning and exchange events. In 2018, following the Paris Communiqué, the BFUG established the Bologna Implementation Coordination Group (BICG) with the aim of completing the implementation of three key commitments: the three-cycle system (EQF and ECTS), the Lisbon Recognition Convention, and quality assurance (ESGs).

[17] Board, Working Groups, Networks, Ad-Hoc Working Groups, Seminars.

implementation of the work programme of the EHEA, its role as an internal and external contact point for the EHEA, sharing important messages with members and stakeholders, and its role in preparing the Ministerial Conference and the Bologna Policy Forum under the supervision of the BFUG[18].

The Bologna Process - as its name shows - is a process rather than an organization or institution, implying that there is a continuous development and progression. It functions according to the open method of coordination: common objectives set at the European level, translated into guidelines and national action plans, followed by a rigorous evaluation and benchmarking of national performances (Regent, 2003; Borras and Jacobsson, 2004; Ania and Wagener, 2009). However, in the case of the BP each of these phases has its downsides. At the supranational BP level, in most of the cases there is no conceptualization of specific policies (see section below) and therefore, it is left to each participating country to decide how to meet these goals and action lines. Based on these and on further guidelines provided by the BP follow-up groups, most of the member states submit national action plans or country reports (Rauhvargers and Bergan, 2008), which represent either a mixed collection of best practices, national priorities and repackaging or adaptation of existing policies. As far as the monitoring and evaluation stage is concerned, several initiatives developed across time, among which the elaboration of stocktaking reports and scorecards, country implementation reports, specific action lines reports, and so on. Through these monitoring exercises, as Ravinet (2008) claims, the nature of the BP swiftly changed from a fragile and informal process in the beginning, to a more unified, formal and gradually binding policy-making process for the countries involved.

Peter Scott (2012) argues that BP action lines:

> *have always had to be negotiated within terms of a delicate balance between Europewide initiatives and the prerogatives of nation states. As a result, the identification of issues that can be regarded as subject, directly or indirectly, to the Bologna Process, has always had to be done within the context of this dynamic between European institutions and nation states. This dynamic has determined which topics are to be included and which are to be reserved for national determination (and the overlay between Bologna 'action-lines' and national reform movements has added an additional layer of complexity – and ambiguity?)* (p. 5).

[18] The European Higher Education Area' official website, available at: http://www.ehea.info/page-bfug-secretariat

This phenomenon has contributed in determining the rate of implementation despite the fact that they have been formally agreed upon by the ministers of education through the ministerial declarations and communiqués.

Overall, it becomes clear that the agreed BP "model" is an integrated one and it operates as a mechanism in which the functioning of one component preconditions the functioning of the next. Given its specific components, including the joint decision making process between the Ministers of Education from the participating countries, and the commitments or action lines they have developed since its inception, the BP acts as a policy model that allows participating countries to jointly define common objectives for guiding national policy, to translate guidelines into national action plans and to evaluate and benchmark national performances. Through cooperation in HE, countries can strengthen their HE system and address common problems which otherwise could not be dealt with at the national level or alone. For policy-makers, introducing reforms through a common initiative is easier than facing the potential opposition at the domestic level, as cooperation can overcome resistance from universities, academics and students alike. Besides, this cooperation is a driving force in moving forward common reform agendas, it allows countries to engage in joint actions and deliver common services and enjoy the potential benefits of cooperation. Broadly speaking, cooperation in HE can contribute to fostering greater regional integration, competitiveness, and economic growth (Bloom et al., 2005).

1.4. The Result of Cooperation: A Common Set of Higher Education Policies

This section aims to shed light on what is supposed to be implemented in the BP. How are these policies conceptualized and operationalized? What are the dynamics and relationships between them, and how this can affect implementation? The Bologna Implementation Reports (2012, 2015, and 2018) are some of the most important official BP sources contributing to the understanding of the different principles, goals, objectives or tools of the Process. Each of them puts forward a table which presents "the main milestones and commitments", which are the results of the ministerial meetings from Sorbonne onwards.

Table 1. The Bologna Process: from Sorbonne to Yerevan

Mobility of students and teachers	Mobility also for researchers and administrative staff	Social dimension of mobility	Portability of loans and grants	Attention to visa and work permits	Attention also to pension systems and recognition	Benchmark of 20% by 2020 for student mobility	Explore path to automatic recognition of academic qualifications	Implementation of key commitments
A common two – cycle degree system	Easily readable and comparable degrees	Fair recognition of Development of joint degrees Social Dimension Lifelong learning (LLL)	Inclusion of doctoral level as third cycle Equal access Alignment of national LLL policies Recognition of Prior Learning RPL	QF-EHEA adopted National Qualification Frameworks (NQFs) launched Reinforcement of the social dimension Flexible learning paths	NQFs by 2010 Commitment to national action plans Partnership to improve employability	NQFs by 2012 National targets for the social dimension to be measured by 2020 LLL as a public responsibility Focus on employability	Roadmaps for countries without NQF Widening access and competition rates Enhance employability, LLL and entrepreneurial skills through cooperation with employers	Implementation of key commitments Social inclusion Employability
Use of credits	A system of credits (ECTS)	ECTS and Diploma Supplement (DS)	ECTS for credit accumulation		Coherent use of tools and recognition practices	Implementation of Bologna tools	Ensure that Bologna tools are based on learning outcomes	Adoption of ECTS Users Guide
	European cooperation in quality assurance (QA)	Cooperation between QA and recognition professionals	QA at institutional, national, and European level	European Standards and Guidelines go quality assurance ESG) adopted	Creation of the European Quality Assurance Register (EQAR)	Quality as an overarching focus for EHEA	Allow EQAR registered agencies to perform their activities across the EHEA	Adoption of revised ESG and European Approach to QA of joint programmes
Europe of Knowledge	European dimensions in higher education	Attractiveness of the EHEA	Links between higher education and research areas	International cooperation on the basis of values and sustainable development	Strategy to improve the global dimension of the Bologna Process adopted	Enhance global policy dialogue through Bologna Policy Fora	Evaluate implementation of 2007 global dimension strategy	Learning and Teaching: Relevance and quality
1998 Sorbonne Declaration	**1999 Bologna Declaration**	**2001 Prague Communiqué**	**2003 Berlin Communiqué**	**2005 Bergen Communiqué**	**2007 London Communiqué**	**2009 Leuven/ Louvain-la-Neuve Communiqué**	**2012 Bucharest Communiqué**	**2015 Yerevan Communiqué**

(Source: Bologna Implementation Report, 2018)

Like most of the Bologna implementation reports, the 2018 report puts forward a table (Table 1) which presents the main milestones and commitments, as a result of the ministerial meetings from Sorbonne to Yerevan. One strength of this table is that it identifies the main themes and it follows their development in a systematic and chronological manner, helping to visualize the ever-evolving BP agenda and how these commitments developed over time.

While there is a lot of talk about the implementation of the BP and the consolidation of the EHEA, there is no comprehensive inventory of the BP policies (Zgaga, 2012) but rather a list of

policies across time. Moreover, from a conceptual point of view it is not clear what is talked about when assessing the level of implementation within the BP.

A simple text search in the Bologna Declarations (3) and Communiqués (8) reveals that implementation is used mainly when referring to *reforms, goals, objectives, principles, recommendations, conventions, European standards, priorities, guidelines, strategies, tools, action lines, commitments,* but also more concrete elements such as the *Diploma Supplement*, *ECTS*, *mobility*, *internationalization*, *quality assurance*, *student centered learning and lifelong learning policies*, *European Standards and Guidelines*, *the Lisbon Recognition Convention,* and *the European Higher education Area* itself - as defined in the Sorbonne Declaration.[19]

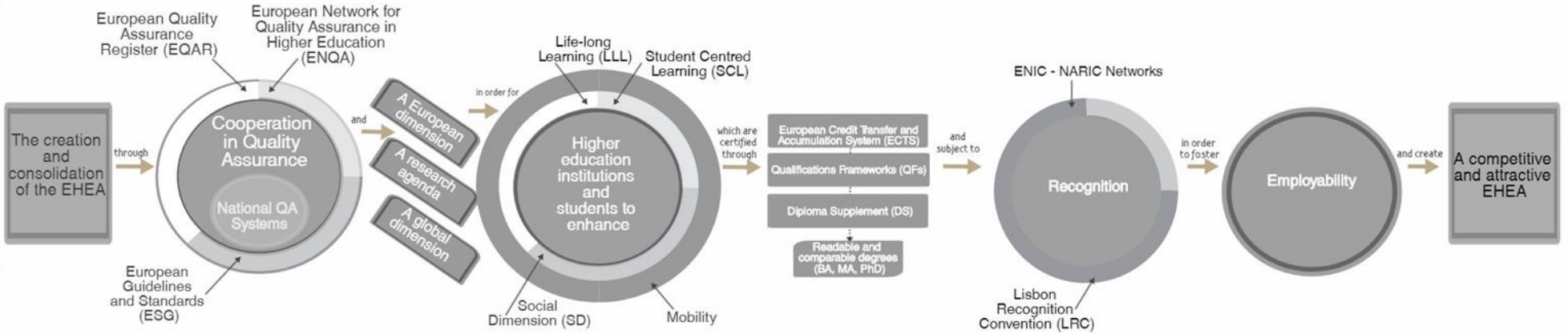
Pavel Zgaga was among the first scholars to examine from a conceptual point of view the "EHEA principles" (see also Corbett, 2012). He argues that within the BP, most of the time, the used dialects overlap, and what is referred once as an *action line* is becoming later a *tool*. According to him, a *principle* "is not related to developing an *instrument*" (p. 18) but is rather a value foundation which comprises certain rules for further action and *standards* which uphold the "EHEA-ness". For Zgaga (2012), transparency, the social dimension and other such elements represent core BP *principles,* since they incorporate values such as democracy, fairness and justice; *goals* represent *ends* which are targeted through *principles* and *tools* (e.g., BP means). In sum, he claims that *principles* (or core values) lead to *general objectives* or *goals* that are reflected in *action lines,* which in turn require setting up *priorities* for political *action* or specific *policies.* Overall, Zgaga's (2012) approach contributes both to a conceptual clarification and helps to understand the BP vocabulary used by the actors involved, practitioners and academics. Such a differentiation between goals, commitments, objectives, etc. and different existing tools has a great potential in identifying "the implementation of what" within the BP. At the superordinate level there are goals, commitments, objectives, etc., which later are addressed through the use of different instruments and tools. While this discussion progresses in the identification of what the BP stands for, one of the missing pieces is to prove how these goals, commitments, objectives, etc., and the policy tools and instruments designed for their implementation are reflected within the BP declarations and

[19] The method employed is a computer assisted content analysis using NVivo - a qualitative data software which helps to organize, classify, and analyses unstructured and non-numerical data, which identified a general quantitative topic pattern across the documents which refer to BP implementation. For the outcome of the research consult Annex 1.

communiqués, in other words what are the envisioned mechanisms for achieving the main goals of the Bologna.

Based on the communiqués and declarations, on the general BP implementation reports and also on national and other relevant reports, it became clear that the BP focusses on the one hand on (1) learners and, on the other on (2) learning outcomes (see also the Bologna Process Stocktaking Report, 2007). In order to better visualize the relationship between different action lines and tools, based on the way in which the BP action lines have been portrayed, Figure 1 shows what the BP stands for when it comes to its main action lines and tools. The flowchart presents the BP with regards to several policy dimensions ranging from core principles focusing on learners - such as high quality education, the structure of the education cycles, the content taught and the types of learners accessing it etc., to aspects related to the expected outcomes after participating in HE – such as recognition procedures.

Figure 1. Systematizing the Bologna Process Action Lines



(Source: developed by author)

When compared with other attempts to define what the BP is about, the above chart provides a more systematic and clear way of what the BP stands for. After assessing how these action lines have been defined, how they evolved, and identifying the tools that have been created for their implementation, two observations have to be addressed with regards to the relationships between different action lines and tools (see Table 2 below). First, there are action lines which are not clearly defined and operationalized, and create confusion when compared with other action lines (e.g., student centered learning). The second observation refers to the fact that there is a strong (inter)dependency relationship between some of them (e.g., mobility and QA, mobility, and SD, etc.).

As far as the first aspect is concerned, some action lines presented above, such as the social dimension, the global dimension, student centered learning, lifelong learning or employability are lacking a systematic definition and overlap in terms of content with other action lines. In the policy design literature, it is argued that the choices for certain policy instruments (techniques or tools available to governments for implementing the desired policy objectives) affect the later implementation stages (Sidney, 2006; Schneider and Ingram, 1990; Lascoumes and Le Gales, 2007). The presence of specific instruments and tools make an action line clearer and operationalizable and therefore more likely to be implemented. Matland (1995) proposed a framework which aims to shed light on some of this relationship and the implementation difficulties it may entail. Matland (1995) argues that conflict arises when there is an interdependence of actors, an incompatibility of objectives and a perceived zero-sum element to the interactions, whereas ambiguity can be operationalized as ambiguity of means and goals, and creates misunderstandings and uncertainty but in the same time they do not lead to conflict since ambiguity is often a prerequisite for passing new legislation. However, Matland (1995) argues that when the policy is clear it is easier to evaluate whether it has achieved or not its objectives. As such, macro level actors are in a situation in which they can exert substantial control and therefore foster full implementation.

For example, student centered learning (SCL) first appeared within the BP through the London Communiqué (2007) without any details of what it consists of, and it was presented as a shift from teacher driven provision too SCL. In the Leuven Communiqué (2009), the teaching mission of universities was reinforced and the need for curricular reform which has the learner and his/her personal aspirations in its center. Besides curricular reform, “new approaches to teaching

and learning, effective support and guidance structures" (p. 4), teaching quality and student empowerment were stated as necessary conditions for SCL to be in place[20]. Similarly, the social dimension had no definition until recently, and most of the times overlaps in terms of content with other action areas, such lifelong learning. A better conceptualization of the social dimension has been developed through the data collection mechanisms (implementation reports), which were assessing the composition of the student body, the non-informal access routes to HE, student services, financial support schemes, etc. In her book *European Higher Education Policy and the Social Dimension: A Comparative Study of the Bologna Process*, Kooij (2015) provides an account of the development of the social dimension and contends that when it first appeared on the agenda it was an ambiguous item, which appeared under other action lines such as student mobility or lifelong learning. Here, it is claimed that when compared with another action lines such as degree structure or recognition, the social dimension does not have "clearly defined operational outcomes" (p. 63). In fact, these are not the only action areas not clearly conceptualized, the global dimension, student centred learning or employability face a similar challenge.

As far as the interdependence aspect is concerned, this has been noted by both practitioners and scholars. Within the BP reports, stocktaking exercises and even trends reports, this interdependence aspect has been brought up as one of the main challenges in implementation. In public policy studies, the notion of policy interdependence is generally used in monetary and fiscal policy, regional policy and largely in the literature on policy transfer and diffusion. One of the most cited scholarly articles on interdependence within the policy transfer literature is Gildardi's "Methods for the analysis of policy interdependence" (2014). Gilardi claims that interdependence occurs when policy decisions in a given context are systematically conditioned by prior policy choices made in other contexts. From an academic perspective, Sursock, Smidt and Korhonen (2011) contend that the implementation of the BP has been hindered to a certain extent by its evolving policy agenda. The authors claim that this did not allow institutional actors to grasp the idea that the BP "tools and action lines are interlinked" and therefore they conclude that "those

[20] A widely accepted definition of SCL is provided by ESU, and states that SCL "represents both a mindset and a culture within a given higher education institution and is a learning approach which is broadly related to, and supported by, constructivist theories of learning. It is characterized by innovative methods of teaching which aim to promote learning in communication with teachers and other learners, and which take students seriously as active participants in their own learning, fostering transferable skills such as problem solving, critical thinking and reflective thinking" (ESU 2015, p. 5 Time for a New Paradigm in Education: Student-Centered Learning ESU) available online at: https://www.esu-online.org/wp-content/uploads/2016/07/Overview-on-Student-Centred-Learning-in-Higher-Education-in-Europe.pdf

institutions that have delayed implementation have managed to achieve a better understanding and a fuller exploitation of the links between the different Bologna action lines" (p. 27).

In the same line or argument, 2007 Stocktaking report claims that "[while] there has been progress on specific action lines and indicators, it is not enough to look at these in isolation because all aspects of the Bologna Process need to be seen as interdependent" (Bologna Process Stocktaking 2007, p. 50). A brief look at the BP policy declarations and communiqués shows that the use of ECTS and quality assurance systems can help in facilitating comparability of qualifications; ECTS also contributes in the recognition of degrees across countries; and since the Diploma Supplement provides information on student's studies, the level of the degree, etc. ECTS provide information on studies in term of credits indicating the scope of the studies[21]. In this respect, learning outcome are not different either: "It remains equally true in 2009 that learning outcomes are central to the development of qualifications frameworks, systems for credit transfer and accumulation, the diploma supplement, recognition of prior learning and quality assurance" (Bologna Process Stocktaking, 2009, pp. 26-27).

Table 2 below combines Matland's (1995) policy ambiguity-clarity dichotomy with Gilardi's (2014) concept of policy interdependence to show how the BP action lines reflect these characteristics. The distinction between low-high clarity levels is operated based on the conceptualization of the action area or tool in the BP declarations, communiqués, and reports. The interdependence level is assessed based on the number of relationships one action line or tool has with another: low interdependence – few relationships (3-5), more relationships put the action line or tool in the high interdependence category.

[21] "Incorrect or superficial use of ECTS is currently still widespread. Such usage hinders the re-structuring of curricula, and the development of flexible learning paths for students, while also making both mobility and recognition more difficult" (Trends, 2007, p. 8)

Table 2. Ambiguity-interdependence in the Bologna Process

	(inter)dependence high		**(inter)dependence low**
clarity (formulation) high	The creation & consolidation of the EHEA Recognition Degree-cycles ECTS	Qualification Frameworks Diploma Supplement Quality assurance Mobility ESGs	The European dimension Lifelong Learning EQAR ENQA EQAF
clarity (formulation) low	Employability Higher education institutions and students' participation ERA-Doctoral studies (3rd cycle)		Social dimension Student centered learning The external dimension

The implications for having both unclear and/or interdependent policies within the BP generates highly relevant implications for implementation. The ambiguous conceptualizations of these action lines and tools at the BP level can be the result of the "sensitivity" of the topic (or issue salience) and its interpretation in different national contexts. Moreover, the fact that for most of such action lines there are no tools (e.g., agencies, guidelines, etc.) that can contribute in their implementation shows the secondary importance of the issue on the BP agenda and therefore, its lower likelihood for implementation.

1.5. Differentiated Integration within the Bologna Process

In the last few decades, the concept of *differentiated integration* has emerged within EU studies and it has been used in many other fields (e.g., environmental policy) and governance settings (e.g., MERCOSUR in Latin America). The concept illustrates an integration process which despite similar standards produces rather different outcomes. Applied to the EU, Holzinger and Schimmelfennig (2012) claim that differentiated integration refers to the territorially fragmented validity of EU rules. This fragmentation provides flexibility which allows EU rules not to be applied in some member states and there are no enforcement mechanisms or sanctions for non-compliance.

This phenomenon is not only about the validity of the rules but also about the ability and eagerness of the member states to participate in the integration process (Andersen and Sitter, 2006). Scholars have come up with different types of *differentiated integration*. For example, Holzinger and Schimmelfennig (2012) propose a range of types of differentiated integration, based on whether the differentiation is temporary or permanent, functional or territorial, etc. Based on these criteria, the types of differentiated integration they propose include among others multi-speed, multiple standards, and flexible cooperation, all of these reflecting different levels and

depths of implementation. In a similar fashion, Schimmelfennig, Leuffen and Ritberger (2015) coined the terms *vertical* and *horizontal* differentiation. Vertical differentiation refers to cases in which a policy area has been integrated at different speeds and reached different levels of centralization over time, whereas horizontal differentiation relates to the territorial dimension and refers to the fact that many integrated policies are neither uniformly nor exclusively valid in the EU (p. 765). Similar to the EU case, the BP reveals different manifestations of differentiated integration, which are referred to in this thesis as implementation levels (outputs).

Furlong (2011) was among the first scholars to use the concept of differentiated integration to capture the diverging BP implementation outputs. Within the BP, participating countries do not have the opportunity to explicitly opt-out from a specific policy area; it is expected that through their membership they will continuously comply with the BP commitments, choosing to move forward at different speeds and towards different goals and objectives. Veiga et al., (2015) argue that in order to assess the contribution of the theory of differentiated integration one needs to take into account that "the Bologna Process, although voluntarily enacted, has support in national and institutional elements and is promoting discretionary decisions and practices, nuancing differentiated integration, and thus allowing for flexibility" (p. 90). Moreover, they argue that these unexpected levels of implementation across participating countries are related with the diversity of interests, the growing complexity of the decision-making process, but also due to the diverging expectations towards integration. Other scholars have attributed these "problems" in implementation to the "continuous development and expansion of the Bologna action lines" (Lindberg-Sand, 2012, p. 197) or BP' different configurations, including national economic and social factors (Veiga, 2019).

Implementation reports have shown that despite the explicit commitment of national representatives, the same pressure, principles, arguments, and narratives they are all exposed to, the implementation of these reforms is uneven across the participating countries (Sin, Veiga and Amaral, 2016). BP studies have shown that participating countries move towards the same direction when it comes to implementing the agreed commitments, however they do so at varying degrees and paces (Heinze and Knill, 2008). A closer look at the existing implementation reports shows that there is a lot to be done to achieve the full implementation of the commonly agreed policy areas. What is puzzling is that there is not only a clear uneven implementation of specific policy areas as mentioned above, there is also an uneven implementation across countries and

regions (see e.g., Veiga, Amaral and Mendes (2008) for Southern European countries). In short, implementation results/levels cannot be categorized based on regions, HE system or governance type, and there is no clear pattern of implementation given the existing similarities across different systems. Different reports exemplify this differentiated integration within the BP at different times.

According to the 2007 Trends V report, after several years of BP there was an "incorrect or superficial use of ECTS" (p. 8), several national systems were lagging behind with the implementation of the Diploma Supplement, there was a lot of confusion with regards to national qualifications frameworks and cycles, there were disincentives to mobility and little action from the HEIs' side with regards to lifelong learning. Trends IV (2005), called "European Universities Implementing Bologna", provides an account on the implementation of four main Bologna action lines (degree structure, recognition, quality assurance and research and training), and concludes by offering a set of success factors in implementation, most of them related to finance, legislative processes or institutional autonomy. According to the 2012 Bologna Process Implementation report, the three-cycle degree system has been implemented in most countries, however some countries which introduced legislative changes later maintained older types of programs (e.g., Spain). For example, in terms of the completeness of implementation of the first and second cycle (BA, MA), Romania is among the countries where at least 90% of the students are enrolled in a BP-compatible two-cycle degree system, whereas in countries like Germany, only 25-49% of all students are enrolled in such programs. A similar situation occurred with regards to the implementation of the European Credit Transfer System (ECTS), where countries like Belgium (Flemish Community), France and Switzerland have had a 180 ECTS system for the first cycle programmes. Bulgaria was among the countries who have a 240 ECTS model for the first cycle and a 90 ECTS model for half of the second cycle programmes. Bulgaria is also one of the countries with no legislation facilitating joint programmes or degrees, and at the time of the report it was in its first stages of implementing the National Qualifications Frameworks (NQF). The 2012 report also stressed that quite a high number of HEIs are developing strategies for quality assurance and continuous enhancement (in 12 higher education systems all HEIs had a published QA strategy), however, despite the fact that countries welcomed the European Quality Assurance Register (EQAR), most of them remain reluctant to transfer responsibilities for external quality assurance outside their borders.

The 2015 Bologna Implementation Report shows that in countries like Estonia or Switzerland there is no legal requirement for establishing an internal QA system; the social dimension and lifelong learning, mobility, completion rates and graduates employability. This Report reveals that 16 countries have made progress with regards to the implementation of the NQFs, whereas other countries stagnated compared to their situation in 2012. Similarly, in countries like Albania, Russia, and the United Kingdom, ECTS were allocated in less than 75% of programmes. With regards to the social dimension, the report shows that "the goal of providing equal opportunities to quality higher education is far from being reached" (p. 19), with less than 20% of participating countries setting concrete quantitative objectives with a reference to under-represented groups. Similarly, little progress has been registered with regards to lifelong learning – a concept which is rarely well defined and operationalized. The Report further claims that the EHEA is moving towards a "more common and much more understandable structure of degrees", with almost half of the participating countries making "substantial progress in implementing national qualifications frameworks" (Bologna Implementation Report, 2015 p. 17).

The 2018 Bologna Implementation Report starts by providing an overview of the HE landscape in Europe (number of students and institutions, expenditure, etc.) and continues with a similar approach as the 2015 report, looking at the learning and teaching context in general, the implementation of degrees and qualifications, quality assurance, the social dimension and last but not least, the relevance of the teaching and learning outcomes and students employability. The report shows that even through the three-cycle degrees have been on the BP agenda from the very beginning, there is still a minority of countries where this has become a reality. Moreover, the ECTS, the DS or the NQFs are not fully implemented or there is slow development in countries such as Belarus, Russia or the Czech Republic. With regards to the 1997 LRC (the only binding documents within the BP), it is claimed that there are still reported cases on recognition problems, work to be done among participating countries with regards to establishing procedures targeting refugees or displaced persons (e.g., Italy), and "considerable effort" is needed in some countries for implementing the concept of automatic recognition (for example, in Azerbaijan, Bulgaria, Kazakhstan and Spain graduates are expected to request a DS).

With regards to quality assurance, the 2018 Report shows that most of the participating countries are legally required to have a QA strategy but not all of them are required to publish it. The report presents a positive QA picture, with the implementation of the ESGs presented as a

"widely addressed and achieved" practice. It is stated that a third of the BP countries need to take action with regards to the 2015 ECTS Users Guide – a tool supporting the correct implementation of the ECTS. Eight countries - Belarus, Bulgaria, Kazakhstan, Latvia, Sweden, and the United Kingdom (Scotland) - have their own national credit system used for the accumulation and transfer of credits. Concerning the social dimension, it is stated that "only few countries have introduced measures in recent years to improve the conditions for under-represented groups to access and complete higher education" (p. 15) and that "equal access to higher education for students of different backgrounds is far from being a reality" (p. 167).

This chapter aimed to provide a policy context and factual information about the BP, as an illustrative case of an intergovernmental non-binding agreement in the field of HE. It started by presenting the HE governance situation in Europe and the grounds for transnational cooperation outside the EU framework. The chapter addressed the policy-making processes within the BP, and the role of country representatives and supporting governance structures in setting the BP agenda and reaching the common objectives of creating a harmonized, attractive, and competitive EHEA. This chapter also presents what the BP stands for in terms of policies, and what is expected from governments and HEIs to implement in their national contexts. Last but not least, it pointed out the implementation challenges such agreements can bring about for the participating countries and the different levels of implementation and compliance across time, space and specificities of the HE contexts. The next chapter explores the literature focusing on the implementation of the BP. It highlights a gap in this literature and outlines the theoretical approaches needed for understanding the different implementation levels across the participating countries.

2. Literature Review: A Typology of Bologna Process Implementation Studies

This chapter is a review of the literature concerned with the implementation of the BP. It starts by pointing out stakeholders' interest in assessing the level of BP implementation and some of the challenges national governments and HEIs face in this respect. It continues with an analysis of a variety of publications on BP policies implementation. These come from three areas: official documents (declarations and communiqués), policy documents (mainly implementation reports) and academic publications (studies looking at the mode of governance, developments, and the factors contributing or obstructing implementation). The findings show that despite a growing body of research on the BP implementation, there is no theoretically grounded and methodologically sound explanation for different implementation levels across the participating countries. The importance of this review stands also in the fact that it provides useful insights into the state of the art of the BP implementation and sheds light into the different factors that account for varying implementation outputs, all of which are the basis for the research presented in this dissertation.

2.1. Stakeholders' Interest in Assessing the Level of Bologna Process Implementation

There is growing interest in the implementation of the BP policies both from a practical (political and policy) and academic point of view. Table 3 shows the frequency of the word *implement* (with stemmed words) in the Bologna Declarations (3) and Communiqués (8).

Table 3. "Implementation" in Bologna Process declarations and communiqués

Name of the Document	Number of references
Sorbonne Declaration (1998)	0
Bologna Declaration (1999)	1
Prague Communiqué (2001)	0
Berlin Communiqué (2003)	7
Bergen Communiqué (2005)	10
London Communiqué (2007)	9
Leuven Communiqué (2009)	6
Budapest-Vienna Declaration (2010)	6
Bucharest Communiqué (2012)	15
Yerevan Communiqué (2015)	14
Paris Communiqué (2018)	17

The first use of the term *implementation* can be found already in the original Bologna Declaration, in relation to the words *adoption, promotion* and *establishment*, to refer to the *principles* and *objectives* stated in the Sorbonne Declaration. Implementation started to be a serious issue on the BP agenda a few years after its inception, more specifically with the Prague Communiqué (2001), when ministers agreed to meet in two years' time and "review the progress achieved". In the Berlin Communiqué (2003) implementation more prominent due to the fact that the European Commission and the Council of Europe affirm their support for the "implementation of the Process" (p. 2), whereas the Bergen Communiqué (2005) sets the path toward assessing the progress of the BP in a more systematic way. This and the next two communiqués bring in the idea of *full implementation*, seen as a pressing issue in achieving a common EHEA by 2010 and "the full and proper implementation of these objectives at European, national and institutional level will require increased momentum and commitment beyond 2010" (Leuven Communiqué, 2009, p. 2).

The Budapest-Vienna Declaration (2010) portrays a more realistic picture, which shows that the BP elements are implemented variably, or not properly. In this context, the BP agenda is shifted towards creating measures which can facilitate the implementation process, developing new working methods and additional information sharing activities. The discourse changes within the BP. If in the beginning more emphasis was put on the *reforms* themselves and their implications for students and their career opportunities, now the discourse focuses on integrating HE into the bigger picture of knowledge society and the role and purposes of HE in an ever evolving European society:

> *We acknowledge the key role of the academic community - institutional leaders, teachers, researchers, administrative staff and students - in making the European Higher Education Area a reality, providing the learners with the opportunity to acquire knowledge, skills and competences furthering their careers and lives as democratic citizens as well as their personal development* (Budapest-Vienna Declaration, 2010, p. 2).

In the Budapest/Vienna Declaration (2010) and in the 2012 Bucharest Communiqué greater emphasis was put on reinforcing and reaffirming the need for implementing the agreed lines rather than introducing new elements or specificities. Accordingly, the ministers called upon the Bologna Follow-up Group "to propose measures to facilitate the proper and full implementation of the agreed Bologna principles and action lines across the European Higher Education Area, especially at the national and institutional levels" (Budapest/Vienna Declaration, 2010).

By using such discursive practices, BP policy-makers contributed to a great extent to a change in the narrative and the creation of common understandings about the role of HE in Europe. This new vision, which continues in the Yerevan Communiqué (2015), legitimizes the increasing demand for deeper, full, and proper implementation. Worth mentioning here is that in the last ministerial meetings (2012, 2015, 2018) more emphasize was put on refining and deepening (implementing) the agreed commitments, rather than widening the overall process (adding new policy areas).

To sum up, while there is direct reference to implementation within these documents, the language used shows to a certain extent the "powerlessness" of the BP to enforce its commitments at the national and institutional level. The vocabulary used includes words such as *encourage*, *intensify/strengthen the efforts*, *commit*, *advocate*, *support*, *promote*, *reinforce/stress/emphasize/underline the importance/need of something*, *further develop, take forward* or even *restructure* or *reform*, which induce the idea that these policies are not binding but rather recommendations.

Besides identifying and defining common goals and translating common objectives into national and regional policies, the OMC employed to run the BP includes the establishment of indicators and benchmarks for assessing progress towards the goals and, therefore, asks for periodic monitoring, evaluation and peer review as mutual learning processes. In this context, the assessment of the *level of implementation* is a clear example of how the governance mechanism at hand asks for different types of reports and stocktaking exercises for evaluating and benchmarking national performances (Gornitza, 2006). Among the studies that look directly at the level of implementation should be mentioned the national implementation reports (as self-reporting evidence on the progress done), the official BP implementation reports (overall implementation reports across EHEA, usually published before the ministerial meetings), the Trends Reports of the EUA (tracking the progress of the BP implementation within a two-year timescale), or the Stocktaking reports (on the progress made in specific action lines). The idea of including these types of material in the discussion has been triggered by the fact that one cannot exclude/neglect/underestimate them in a study which deals with factors determining implementation outputs. The section below analyses the evolution of these studies in a chronological perspective. The importance and relevance of these reports stands in the fact that

they capture over time, countries and policy areas the differentiated integration aspect discussed in section 1.5.

As far as the Trends are concerned, in 1999 (one year after the Sorbonne Declaration) the EUA undertook a project for the EC called "Trends in Learning Structures in Higher Education", which aimed at providing an overview of the existing learning structures and the areas of divergence and convergence within Europe. Since then, the EUA has been publishing eight more Trends reports[22]. The EUA has shown strong preferences towards certain policy areas such as lifelong learning, quality assurance, university autonomy or accountability, but also on research and training. In general, Trends reports show that in order to further the implementation of the BP, more emphasis should be placed on HEIs responsibility (Trends, 2010).

Following the Prague ministerial meeting in 2001, the BFUG commissioned the creation of national reports as evidence of the progress done. While this first set of reports did not have a common structure which would facilitate the comparability of the developments, it did provide an overview of the key BP related policy changes and reforms. The next set of reports look at the 2003-2005 period and introduced a common template for reporting[23]. The 2005-2007 national reports templates keep the previous guidelines and themes, however, if in the previous reports national contact points were given the flexibility in reporting, with these new templates the exercise becomes more structured. Starting with 2007 the reports follow a new similar structure. In addition to the open questions and flexibility in reporting, the template introduces multiple choice questions or even tables to be completed. Some of the reasons associated with this choice

[22] Trends II (2001) looks only at the signatory countries of the Bologna Declaration and presents the state of art situation from Bologna to Prague. Trends III (2003) feeds in the perspective of over 800 higher education institutions and incorporates the view of different stakeholders (students, government, universities) and reflects upon the implementation of the agreed commitments and the obstacles encountered at the national and institutional level. Trends IV (2005) already reflects the idea that more "deepening" of the Bologna is desired. Trends V (2007), combines implementation related aspects with the impact Bologna policies have on universities' development. If Trends VI examines the Bologna reforms from a macro perspective and in relation with other areas and developments in Europe, Trends VII puts forward higher education institutions' perception on the changes within the sector, with a special focus on teaching and learning. Trends VIII (2018) looks at leaching strategies at the university level, and in more details to approaches, pedagogies and methodologies.

[23] The template is structured in twelve parts. The first part aims to assess the main achievements since Berlin, including important developments such as legislative reforms, followed by the organization of the higher education system, agencies and bodies and their competencies. The next part focuses on quality assurance and aspects related to the institutions involved and the extent to which international peers in quality assurance exercises. The next parts focus on the two-cycle degree, the recognition of degrees and periods of study, and mobility. Some new elements introduced are the doctoral studies and research, aspects related to social dimension, lifelong learning, the contribution higher education institutions bring for enhancing the European dimension and their efforts to promote the attractiveness of the EHEA.

of reporting relate to the idea of eliminating the lack of comparability of previous national reports but also due to the creation of an integrated set of criteria and indicators on what has been achieved and what is still to be done. The role of the national reports within the BP should not be underestimated. They provide first-hand information and data on the developments taking place at the national and institutional level on very detailed and specific aspects. Moreover, it should be mentioned that they facilitate the comparison between participating countries performance, standing as a firm foundation for the compilation of almost all BP implementation reports, including the Stocktaking reports and the general, integrated BP implementation reports.

In 2003, through the Berlin Communiqué, a stocktaking procedure was introduced as a mid-term exercise in the creation of the EHEA. It was believed that such an exercise could provide information on the advancement of the BP and insights into possible challenges and problems. According to Jakobi and Rusconi (2009), the stocktaking exercise aimed to assess national progress in the implementation of intermediate priorities (p. 54). More precisely, it focused on three main action lines: quality assurance, two-cycle system and the recognition of degrees and periods of studies[24].

While there was always a strong interest in ensuring full and proper implementation of the agreed policies, the overall BP implementation reports (2012, 2015, 2018) reflected the desire for reporting on the general progress of BP implementation rather than specific action lines as presented through the stocktaking reports. The 2009 Leuven/Louvain-la-Neuve Communiqué indicated that reporting should be carried out in a coordinated way, with the BFUG leading and overseeing the reporting process, whereas Eurostat, Eurostudent and Eurydice will contribute through data collection. With the aim of providing a comprehensive analysis of the implementation of the agreed action lines, in 2012 the first Bologna Process Implementation Report was prepared for the 2012 Bucharest ministerial conference. The first section provides an account of HE conditions and contexts within the BP (i.e., enrolment, expenditure). The next sections assess the

[24] In March 2004, a Working Group on Stocktaking was created as a result of Minsters' agreement. As such, a set of indicators, criteria and benchmarks for the scoreboard were developed. For quality assurance, the criteria were looking at the stage of development of quality assurance system, at the key elements of evaluation systems (e.g., internal assessment, external review), the level of student participation but also international participation, co-operation, and networking. For the two-cycle degree system the scorecard looks at the stage of implementation of two-cycle system, the percentage of student enrolment in two-cycle systems and the right to apply for admission from the first cycle to the second cycle. Last but not least, in terms of the recognition of degrees and periods of study three main criteria have been identified: the stage of implementation of the Diploma Supplement, the ratification of the Lisbon Recognition Convention and the stage of implementation of ECTS.

basic BP tools with regards to degrees and qualifications, the implementation of the first and second cycles, ECTS, NQF, DS and the implementation of the LRC and ESGs, social dimension (e.g., socio-economic background, geographical region, migrant/refugee status/background), recognition, employability, lifelong learning and mobility. In the same fashion, the 2015 (developed by Eurydice, Eurostat and Eurostudent for the 2015 Ministerial Conference in Yerevan) and the 2018 Implementation Reports (for Paris ministerial meeting) aim to provide an overview of the state of implementation of all main aspects of HE reforms within the BP and touch upon specific challenges regarding the way these are implemented. One of the main weaknesses of these reports is that it they examine mainly the situation at the national level and leave aside HEIs' responses.

The presentation above also suggests that the OMC, the governing mechanism adopted to run the BP, has played an important role in development of different types of reports and stocktaking exercises for evaluating and benchmarking national performances. The importance and relevance of these reports stand in the fact that they capture over time, countries and policy areas the differentiated integration aspect discussed in section 1.5., and provide insights into what was interesting to look at and assess given the existing circumstances at a given time. Moreover, they show the broad interest from different bodies (EUA, Eurostudent, UNESCO, EUROSTAT, etc.) in certain areas, but also the developments in terms of implementation assessment/evaluation (e.g., how the reporting template changed from a qualitative/narrative, theme based report to questionnaire, the need for more cross-country comparable data (at the cost of less insights into national contexts). National reports provide self-reported data on countries' performance with regards to BP implementation, which does not preclude the possibility of misreporting (Harmsen, 2015). The Stocktaking reports provide information on specific action lines within the BP, whereas the Trends reports take a closer look the HEIs level situation. The general BP implementation reports triangulate existing HE data across the EHEA in order to provide a more independent cross-country comparison on implementation performance.

2.2. A Review of the Academic Literature on Bologna Process Implementation

Besides stakeholders' increasing interests in assessing the level of implementation with the BP, from a scholarly point of view there has been a growing interest in researching many of its different aspects as well. One of the challenges here is that "it is difficult to distinguish between research on BP topics and research on European higher education more broadly" (Scott, 2012, p.

2). This is mainly driven by the fact that what the BP promotes is not in itself unique, and policy changes are not always the result of the BP but governments' policy initiatives and reforms, shaped by national contexts and debates (Musselin and Teixeira, 2014) and HEIs' autonomy.

For the specific case of the BP, from an academic point of view, a Web of Science core collection search shows that the academic community is also interested in researching this topic. The search results indicated that around 204 publications contained the syntagm "Bologna Process implementation" in the title or abstract (Bologna Process* implementation)[25]. Starting from 1993 there is a continuous increase through 2010 (the milestone for achieving the establishment of EHEA), followed by a sudden decrease in 2013, and currently the trend seems to increase again, with 2015 and 2019 as the peak years with around 30 publications each. Most of the results are articles (more than 90%), followed by proceedings papers, editorial material, and reviews. More than half of these publications are in the field of educational research, with top authors affiliation from countries such as Spain, Italy, Portugal, Germany, Russia, and England. The Scopus database provides 397 results on BP implementation ("Bologna Process" AND implementation)[26]. This difference can be explained through the academic coverage and features of the databases. Compared to Web of Science, Scopus is more interdisciplinary, has stronger coverage of natural sciences, medicine and engineering, areas which suffered the most within the BP mainly due to the degree structure (they usually have longer cycles). In Scopus almost 65% are articles, followed by conference papers 23%, book chapters, reviews, articles in press, books (1%) and conference reviews. Out of these, 52% are from the field of social sciences, 12% from engineering, and around 9% from computer sciences. About 6% of these publications are funded by the EU, either by the EC or through the EUROPEAN Social Funds. In terms of authors, the first top three authors are Cristina Sin, Alberto Amaral and Amelia Veiga, all of them affiliated with Centro de Investigação de Políticas do Ensino Superior (CIPES) from Portugal.

Some of the well-known studies in the field come as a result of the Higher Education Dynamics series, or special journal issues focusing on the BP[27]. Of high importance here is the Bologna Researchers' Conference, officially known as "Future of Higher Education - Bologna

[25] Search performed on April 19th, 2020
[26] Search performed on April 19th, 2020
[27] For example, the 2004 European Journal of Education, 39(3), or the 2009 Innovation: The European Journal of Social Science Research, 32(4) Special Issue: 20th anniversary of the Bologna Process: Europeanization through Soft Governance.

Process Researchers' Conference" (FOHE-BPRC). Since 2011, in preparation for the ministerial meeting in Bucharest, the conference has been organized in Romania every three years (2014, 2017, and 2020) by the Romanian Executive Agency for Higher Education, Research, Development and Innovation Funding (UEFISCDI). According to the official website of the conference, it is part of the EHEA official calendar of events and "it aims at providing a unique forum for dialogue between researchers, experts and policy makers in the field of higher education"[28]. According to the EHEA official website, it also aims at "bringing the researchers' voice into HE, as well as the experience of various actors active in international level policy making"[29] as a way to inform policy-making and address the gap between policy-making and research within the EHEA (i.e., informing the work of the BFUG). Up to now, as a result of the conference three research volumes have been published by Springer – altogether 148 chapters[30], with an upcoming volume in June 2020.

A quick scan of the literature shows that there are three main categories of studies focusing, all of which will be briefly illustrated below, with implementation studies the focus of this section. A first category looks at *the mode of governance*. For example, Amaral et al., (2009) analyze the impact of European integration "process through which countries pool resources, create common institutions, and make and implement joint decisions". These category addresses aspects such as the history of EU integration in HE, the role of EU institutions in HE, especially of the European Commission, and the role of the BP in the EU integration process. Lažetić (2010) analyses BP structures, institutions and the interactions and dynamics between national, institutional and supranational actors. Vukasovic et al., (2018) explore the multi-level, multi-actor and multi-issue dimensions of governance of the EHEA. Most studies look at the soft law instruments of

[28] Future of Higher Education – Bologna Process Researchers' Conference, http://fohe-bprc.forhe.ro/

[29] *Bologna Process Researchers' Conference*. The European Higher Education Area. Retrieved 20, March, 2020 from http://www.ehea.info/cid104250/bologna-process-researchers-conference.html

[30] The first edition "European Higher Education at the Crossroads – between the Bologna Process and National Reforms" (edited by Curaj, Scott, Vlasceanu, and Wilson, 2012) explores research themes related to BP principles and governance, teaching and learning, QA, mobility, financing, and foresight. The second edition "The European Higher Education Area Between Critical Reflections and Future Policies" (edited by Curaj, Matei, Pricopie, Salmi and Scott, 2015) presents chapters related to internationalization, financing and governance, excellence and diversification of higher education institutions' missions, teaching, learning and student engagement, the SD, research and innovation, QA but also for the first time research related to BP' impact on the EHEA and the role of research in informing higher education policy-making. The third edition "European Higher Education Area: The Impact of Past and Future Policies" (edited by Curaj, Deca and Pricopie, 2018) focuses on five main themes among which the role of the BP and wider world of higher education, the SD and QA, the future of the BP and the EHEA, transparency tools and, financing and governance. In April 2020, the three BPRC proceedings reached around 1200000 downloads.

governance. Sacha Garben (2010; 2012) is one of the top scholars advocating for the embeddedness of the European HE policies in the EU law. The intergovernmental aspect of BP has been studied mainly from the perspective of increasing role of EU institutions in the BP, more specifically how a process that was initially a voluntary, bottom-up initiative became more formalized and increasingly bound (Ravinet, 2008), or how the university world - initially dominating the agenda - has been replaced by external sources (i.e., Lisbon Agenda) (Neave and Maassen, 2007). The OMC adopted to implement the BP is another area of interest. Veiga and Amaral (2006; 2012) are among the few who have questioned the effectiveness of this mechanism. Currently, there is an unprecedented interest in assessing the link between the discourses used by EU institutions and programs (e.g., European Research Area) and the BP (Keeling 2006), or on the more general relationship between the HE policy in Europe and EU institutions (Huisman and Van der Wende, 2004; Batory, 2016; Dakowska, 2017; Vukasovic and Huisman, 2018; Kwiek and Maassen, 2012).

A second broad category investigates the BP *developments and prospects*, that is how it evolved over time, to what extent its goals have been achieved, etc. For example, Wächter (2004) and Terry (2008) provide an account on the origins of BP, its main action lines and their development, the participating institutions and stakeholders, and its impact and effects on European HE. Similarly, Scott (2012) provides a comprehensive account of the BP starting with the pre-Bologna context, its phases, principles and objectives, and its potential future. From a different perspective, Kwiek (2006) assesses the prospects of policy development for different regions within Europe and argues that separate sets of policy recommendations for clusters of countries or regions are the future of BP integration. In the last few years, most of the discussion within this category has been framed around issues of harmonization (Garben, 2010), policy convergence (Heinze and Knill, 2008; Hackl, 2001; Witte, 2008; Van Damme, 2009; Vögtle, 2014; Vögtle, Knill and Dobbins, 2011) and policy coordination (Kauko, 2012) . Another important area within this category looks at the successes and failures of the BP (Smidt, 2012; Matei, Craciun and Torotcoi, 2018; Vögtle, 2019), students, academics and staff resistance to the BP (Pechar, 2012), its impact on the national HE system (László, 2008) or even at some of the unintended effects of the BP reforms (Reichert, 2010). Saarinen (2005) looks at how the BP policies, set jointly and in a transnational setting, are constructed and presented discursively, a fact which requires different strategies and skills from the policy-makers and the involved actors to foster implementation. By

using as data sources the BP declarations and communiqués, the author traces the policy changes within the BP and how they explain the implementation and the (political) views which are embedded in these debates.

A third category explores the *implementation of the BP agreed policies*. A bird's-eye view shows that there are two sub-types of implementation studies, focusing on the level of implementation (similar to the BP reports in section 2.1.) or on the factors affecting implementation, although most of the times with an overlap between them. The first category looks at the *level or depth* of implementation (i.e., to what extent have the objectives of the BP been implemented in the varied HE systems or institutions?). In this category are situated mainly studies which explore the performance of a country or HEI with regards to specific BP action lines. For example, Luchinskaya and Ovchynnikova (2011) look at Russia and the Ukraine with regards to ETCS, dual-cycle degrees and QA. The second sub-category looks at the required *configurations* needed for implementing the BP policies, although their focus is not always explicitly formulated as explaining implementation variation. These studies are looking either at the implementation at the national level of different action lines (e.g., quality assurance, Saarinen, 2005), country specific implementation aspects (e.g., Portugal by Veiga and Amaral, 2009) or the university level (e.g., Turku University by Kettunen and Kantola, 2006). These studies are relevant for the my research since they look at the necessary factors for the implementation of specific policies, either alone (e.g., recognition of qualifications by Rauhvargers and Bergan, 2008), compared with each other, by individual member states (e.g., Austria by Pechar and Pellert, 2004) or regions (e.g., Flanders and the Netherlands by Dittrich, Frederiks and Luwel, 2004). An analysis of these studies from a theoretical and methodological point of view helps in understanding what has been done on the implementation of the BP, how it was done, what matters in implementation and what remains unanswered.

Table 4 provides a typology of illustrative studies reviewing the (perceived) factors affecting implementation in terms of policy area(s), country(ies) and HEI(s) focus.

Table 4. A typology of studies assessing the factors affecting the implementation of the Bologna Process

Country level	**Elias (2011)** ECTS in ES: middle managers reinterpreting the policy **Sin (2012)** MA degree in the UK, DK, PT: policy specification **Malan (2004)** MA, BA, PhD degree in FR: regulations, the Ministry in charge of higher education policy **Pechar and Pellert (2004)** access and curricular reform in AU: policy misfit-strong traditional system **Sursock, Smidt and Korhonen (2011)** SCL and the BA degree in FR, DE, HU, ES, SE: HEIs autonomy and leadership, funding, national policy agendas **Geven and Attard (2014)** SCL: collaborative multi-stakeholder, the policy fits with the national agenda, planning, policy deliverers **Moscati (2009)** IT: legislation, the type of government, academics **Szolár (2014)** RO: perceptions about the BP; politico-administrative involvement of stakeholders, type of higher education system; QA: HEIs, experts, responsible organization	**Barakonyi (2014)** HU: experts, HE acts, government type; ECTS: policy interdependence; QA: responsible organisation **Kovacs (2014)** UKR: Ministerial orders, regulations, HEIs, experts and new bodies; QA: bodies, collaboration with BP structures; Degree cycles: existing fit with national policies; ECTS and mobility: policy interdependence, professionals and academics' support, funding, national interests, monitoring **Orosz (2014)** SL: Legal and institutional frameworks; Degree cycles: Faculties' discretion; ECTS and DS: Ministerial agencies/councils, regulations; Recognition: agencies, the Recognition ion, national assembly, HEIs; Mobility: policy interdependence, funding; QA: HE Council, the agencies; Social dimension: HE acts; LLL: recognition **László (2008**) SK: legislation; Mobility: funding; QA: agency **Šťstná, Walterová (2014)** CZ: legislation, HE acts, planning, ministry in charge, funding
Regional level	**Veiga, Amaral and Mendes (2008)** ES, IT, PT, GR: HEIs autonomy, regulations, legislation, funding, academics, students and staff	**Dittrich, Frederiks and Luwel (2004**) Flanders, NL: ministers, legislation, HEIs as implementers
University level	**Kettunen and Kantola (2006)** QA at Turku University: resources, policy deliverers **Veiga (2012)** HEIs in DE, IT, NO, PT: institutional settings, interests and professional roles; the interconnection of different contexts of policy implementation	**Shaw et al. (2013)** an anonymous HEIs from the UKR: organizational culture **Leisyte, Zelvys, and Zenkiene (2015)** HEIs in LT with regards to QA, mobility ECTS, degree structure: national regulatory frameworks, the type of HEI

(Source: developed by author)

As Table 4 shows, the contributions identified differ with regards to central focus and level of analysis. Most of the studies focus on the country level, take a top-down perspective and explore how national governments reacted to the BP policies, and how these relate to national circumstances and priorities. Some studies focus on BP action lines and explore their implementation at the national and institutional level. A second observation is that country case studies, which look very broadly at what facilitates or obstructs BP implementation, dominate. There is little done at the regional and HEIs level and on comparing different countries and policy areas. The sections below provide an overview of the main categories of studies exemplified in Table 4.

2.2.1. Country and Regional Level Studies

Exploring how supranational and international HE initiatives affect the domestic agendas in Germany, Huisman and Van Der Wende (2004) argue that, generally, the governments accept the interference of the BP in the national HE systems and they design policies that fit the BP. However, the authors claim that through the soft law mechanism governments are given considerable leeway to deviate from the agreed policies: "if European countries like France and Germany are able to resist the binding agreements of the Stability Pact, deviating from a non-binding agreement cannot be considered an alarming violation of rules" (p. 352). Similarly, Welsh (2004) analyses the forces of change and resistance in the German HE system. He claims that reforms are the result of different sources of pressures including global, European, and domestic (both federal and from HEIs), but also a result of generic HE international developments (e.g., the modernization discourse). Some of his considerations point towards the role of institutional networks, path-dependencies, and most importantly the style of HE policy-making in a federalist system. Guth (2006) explores the implementation of the third cycle (the PhD) in Germany. He claims that the law facilitating the implementation of this policy left the structuring of PhD programs to individual HEIs (e.g., the structure and content of study, the admission policies). In addition, BP policy documents do not provide enough details in this respect, a fact that poses further implementation challenges. The lack of details effectively offers individual HEIs enormous leeway in what and how they choose to implement.

One of the few studies providing a more comprehensive explanation on the implementation performance (for the case of Portugal) was published by Sin, Veiga and Amaral (2016). They explore the difficulties emerging from the implementation of mobility, employability and attractiveness of the Portuguese HE system as revealed through national data

and academics' perception. The findings reveal that some of the common challenges refer to the country's overall socio-economic context but also to the implementation method, actors' political will and institutional behavior. For the specific case of mobility, national legislation was crucial since it introduced the ECTS and the DS, all of these contributing to the standardization of administrative procedures and instruments across Europe. For internationalization, the lack of strategy at the national level put internationalization low on HEIs agenda. Similarly, Diogo and Sabic (2015) point out that in Portugal the role of the Parliament and the government were crucial in adjusting the national HE laws; specialized task forces at the government level have been created to deal with the ECTS or the DS. The study also points out that despite HEIs' autonomy, they lacked an institutional initiative with regards to the implementation process, suggesting a missing link between the government's role as a regulator and individual HEIs' agency. Similar findings for Portugal have been revealed by Sin (2012), who claims that there is a gap in expectations regarding the implementation of the BP, and that HE authorities do little to either promote or own the BP.

Moscati (2009) looks at the implementation of the BP in Italy. He argues that the type of HE system in Italy (one of the most traditional ones in Europe) represented an obstructing factor in implementing the BP reforms. He also finds that the type of government and its support from academics matters, showing that HEIs can influence the implementation of the BP reforms. Similarly, in assessing the degree system in Austria in line with the goodness of fit hypothesis, Pechar and Pellert (2004) astutely argue that "the reform effort to harmonise the study architecture is greatest for countries with the traditional one-tier system" such as Austria, whose HE system features "are incompatible with the Bologna Process, which means that the reform pressure in Austria is quite high" (Pechar and Pellert, 2004, p. 317). This meant that the BP pressure for reform is strongly related to existing governmental demands for change at the domestic level.

Matei et al., (2015) look at the implementation of the BP and the national challenges faced by the Romanian system. They argue that Romania has taken substantial voluntarily steps for aligning its policies to the ones promoted by the BP. Fundamental reforms took place, including legal adjustments, new national policies and structures, but also more clear guidelines and regulations for HEIs themselves. Among the factors that facilitated this alignment are worth mentioning the supportive legal framework and a close interaction between governmental bodies and ministries and HE institutions, students, and teachers. One of the challenges mentioned is that the academic communities have limited or partial understanding of the BP principles. Szolár (2014) complements this view, for the case of another country,

claiming that the proposed changes come mainly from "above", are adjusted by the government and then completely left in the hands of the HEIs. The facilitating features mentioned refer to the existent "governmental initiatives, decisions and legal aspects, in general, the activities and participation of political-administrative level in this process" (p. 184).

With regards to QA, one of the most researched BP policy areas, several country level studies present specific conjunctures. Hauptman Komotar (2018) focuses on the development of the QA system in line with the BP in Slovenia. The study reveals that the type of government and the preference of national political actors, but also the existing QA practices at the European and regional level (i.e., through institutional isomorphism) contributed to a great extent to the convergence of QA policies in Slovenia. For the case of Finland, Diogo and Sabic (2015), claim that compared to previous reforms the BP was not perceived as bringing a high degree of novelty, even though, national policy-makers promoted the BP as the solution for domestic problems of Finnish HE. Välimaa, Hoffman and Huusko (2007) point out that despite this, several committees were established to prepare changes in legislation, and national wide seminars took place about the BP. At that time, QA was not a national level institutionalized policy. In the early national level QA development phase, the Ministry together with its committees put forward a poor QA definition as the basis for further QA practices at the HEIs level, yet this posed important challenges for further implementation. Kauko (2012) also argues that QA responsibility lies with HEIs, implementing it requires strong, autonomous HEIs.

Regional level studies are inspired by Heinze and Knill (2008), who develop hypotheses of convergence based on different factors: linguistic similarity between member states, similar university culture, pre-existing policy similarity, similarity of national governments policy preferences, similarity of policy-specific problem pressure, similarity of socio-economic structure, the existence of a culture of compliance, etc. In line with this approach, Vögtle (2014) investigates whether the impact of the BP does contribute in decreasing or increasing the HE policy variance and convergence. This is one of the few studies that looks at a variety of country cases (14 old EU members and other 6 non-BP members from outside Europe) and multiple policy areas (e.g., ECTS, QA, DS, degree cycles) between 1996 and 2008. Vögtle's study expects cultural, political-institutional, and socio-economic similarities between countries to condition the degree of policy convergence in the adoption, instrumental design, and degree of implementation in the domains of some of the BP action lines. The findings reflect that the BP "has triggered substantial policy harmonization" mainly due to the communicative framework surrounding the BP promoted by international organizations and expert networks. For the implementation of the specific policies lesson drawing, cultural similarities or policy-specific

institutional similarities were important, but what counted more was the fact that many countries already had these types of policies at the national level.

Soltys (2015) explored the experience of several former-socialist countries with the BP and its implementation. Generally, it was noted that new policy ideas and reforms (usually from Western countries) have difficulties in being adopted in a very different cultural setting. In addition, former socialist countries' traditional top-down and bureaucratic policy-making methods are not efficient in implementing HE reforms. In Russia, most of the reforms should be in line with existing state regulations, and if policy change happens this is mainly, or even only, within a strong group of HEIs (top HEIs). In Ukraine, the type of government was a crucial factor for getting aligned to the BP. In Moldova this alignment was an issue of resources and finance, whereas Kazakhstan proved its genuine commitment in trying to improve its HE system via the BP.

Huisman (2019) uses a literature review to explore the factors explaining why and to what extent post-Soviet states (most of them non-EU members) engaged with the BP. Three factors proved to be significant: the administrative top-down approach (with several ministries involved, generally ignoring stakeholders' voices) and their capacity to further policy change, the mismatch between BP reforms and domestic institutional legacies, and the lack of openness of the post-Soviet states to other systems.

Veiga, Amaral and Mendes (2008) explore the implementation of the BP in four Southern European countries - Greece, Italy, Portugal and Spain. In Italy it was found that implementing the BP required a continuous process, highly dependent on regulations. In Spain, the reforms targeting HEIs governance put on hold the implementation of the BP. A common feature in all these countries pointed towards a lack of proper involvement of academics, students and staff in the implementation of the BP reforms, but also issues related to the strength of HEIs' autonomy, the specificity of regulations and legislation (the more specific, the more likely to be implemented), and level of available funding.

Dittrich, Frederiks and Luwel (2004) explore the contexts of Flanders and the Netherlands with regards the introduction of the Bachelor/Master system, quality assurance and the introduction of accreditation, and mobility. With regards to the degree system, it was found that in the Netherlands an important role was held by the education council providing advice to the ministry in charge of HE, which latter adopted the needed legislation. In Flanders, different umbrella organizations of universities and students actively contributed in the preparation of policy decisions leading to BP implementation. In both contexts HEIs as implementers were crucial in making these policies a reality.

To sum up, the insight with regards to what facilitates implementation refer to BP's alignment with already existing or in the works national HE policy agendas, followed by the existence of a legal or regulatory framework, most of the time put forward by politico-administrative factors (e.g., government, agencies) favoring BP policies. In addition, some studies point towards the contribution of different experts, academic communities or bodies providing advice and expertise to national policy-makers. Last but not least, HEIs' autonomy and their resources and capacities are vital in implementation.

2.2.2. Institutional Level Studies

One of the first comparative studies concentrating on HEIs performance with the BP reform was done by Miclea (2003). The author focuses on the experience of nine key universities in South East Europe with regards to their progress in achieving the BP. This study puts forward a strong argument for the role of HEIs in reshaping the European HE space, arguing that "before winning over the systems of HE, the spirit of Bologna must first be accepted at institutional level. It is the clear responsibility of individual universities to reform those inner aspects of academic life that can promote the implementation of the Declaration" (Miclea, 2003, p. 265). The main argument is that HEIs have a certain degree of autonomy, which questions the "rational top-down linear process" implied by the BP.

Other studies focusing on the factors that facilitate or obstruct implementation at the HEI level present rather diverse perspectives. At the macro-level, the type of HE system, HEIs' autonomy and support from academics are deemed decisive (Moscati, 2009). Veiga and Amaral (2009) look at the Portuguese HE system and how its institutions changed after the legislative framework for the implementation of the BP was put in place. Using the new institutionalism to explain the role of institutions in developing and transmitting the norms induced by the BP, it is claimed that a shift occurred from a logic of consequence (rationalist approach) to a logic of appropriateness (norm based approach). The authors hypothesized that "the fast implementation rate and the positive perspective of policy implementation were linked to a specific logic of action that puts more emphasis on form than on substance" (Veiga and Amaral, 2009, p. 58). Similar studies have shown that academics, students and staff can either support (through advocacy and lobby, methodological proposals, etc.) or resist new HE initiatives (Veiga, Amaral and Mendes, 2008). Veiga, Amaral and Mendes (2008) contend that universities as autonomous, stand-alone institutions - both as policy implementers and end beneficiaries - can circumvent the central level and decide which policies to take on board or not. In another study, Veiga (2012) uses a survey to reveal the perception of academics, staff

and students from several universities in Germany, Italy, Norway and Portugal with regards to the institutional policies mediating the implementation of the BP and the impact the BP had at the institutional level. The study points out towards the interconnection between different contexts and levels of policy implementation: sometimes, policies in line with the BP are the outcomes of shared best practices; but also, the institutional settings, interests, and professional roles within universities contribute to interpreting the BP goals when applied at the HEIs' level.

Leisyte, Zelvys, and Zenkiene (2015) explore the implementation of the BP in five HEIs in Lithuania with regards to QA, mobility ECTS and degree structure. One of the first factors affecting implementation was a strong interest at the national level with regards to BP: a working group was formed at the ministry level, complemented by a work plan and national legislation in 2009 (coupled with EU funds), which redefined the role of the QA agency and put the basis for the ECTS. Depending on their type (colleges and universities), HEIs conformed with the BP changes, due to the fact that such reforms helped in increasing their legitimacy, with the support of the academic staff which contributed to the translation and recontextualization of BP policies.

Shaw et al. (2013) explore the role of organizational culture in the adoption of the BP at a Ukrainian university. Their findings show that those in the lower hierarchy within the institution considered that decisions concerning HEI's reforms should be made at the top of the organization. Rather than expressing a democratic policy-making process at the HEI level, they also considered themselves as "doers" whose main task is to put in practice decisions taken at the top and support HEIs' leaders with information.

A quite substantial amount of studies explores the implementation of QA policies. In his study, Kauko (2012) explored how QA became widely accepted in Europe's universities. One of his main arguments is that through their European association (EUA), HEIs were enthusiastic promoters of QA policies as a common frame of reference at the European level. Through QA policies, HEIs saw a possible answer to the challenge of international competition, and a direct link to institutional autonomy. Tutko (2016) explore the implementation of ESGs 2015 in Polish HEIs. While most of the HEIs have achieved great progress with regards to the ESGs, this has been greatly attributed to the Polish Accreditation Committee, which included internal quality assurance criteria in its methodology as required and assessed by ENQA. In a 2015 study on why universities fail to internalize QA, Geven et al., (2015) contend that the inconsistent national regulations with regards to QA make HEIs reluctant to make structural changes. Moreover, they claim that the type of monitoring and enforcement system matters, however it can provide perverse incentives as HEIs might only formally comply with QA

requirements. In the same fashion, QA policies are not understood at tools or instruments for quality enhancement but as rather bureaucratic procedures, which are loosely coupled with teaching and learning activities. Kettunen and Kantola looked at QA policies (planning and implementation) at Turku University with the aim of identifying the responsibilities of the bodies and institutions involved in the implementation of the BP. Their findings show that "quality assurance is most effective when it is located close to teaching and learning. Therefore, education policy should be implemented using the methods of strategic management and quality assurance at the levels of HEIs, departments, degree programs, teachers and students" (Kettunen and Kantola, 2006, p. 266).

To conclude, as revealed through these studies implementation at the HEIs is driven mainly by the existence of a legal framework at the national level, but also by the perceived added value of such policies for institutions. Whether institutional leadership concludes that BP action lines will increase a HEI's prestige, academic staff buy into the action line, and the HEIs has the capacity to put in practice such policies can be quite determinative of what the implementation process looks like and achieves.

2.3. Concluding Remarks

This chapter aimed to review the literature concerned with the implementation of the BP. It started by pointing out stakeholders and scholars' interest in assessing the level of implementation and some of the challenges national governments and HEIs face in this respect.

Looking more broadly at these studies, it can be claimed that they predominantly look at the implementation of those policy areas which are more technical, have guidelines for implementation or at least some more clear provisions and some bodies or agencies that facilitate the implementation. Country case studies, which look very broadly at what facilitates or obstructs BP implementation, dominate. The review of the literature shows that there is little done at the HEIs' level and on comparing different countries and policy areas.

The available academic work on this subject points towards a variety of factors affecting implementation. The relevance of the existing studies is multifaceted. Firstly, they provide insights into the factors affecting the implementation of specific action lines in specific contexts. They point to factors such as finance, legislative processes and institutional autonomy. On the other hand, they emphasize the idea that BP policies do not operate in a vacuum and therefore are highly dependent on other HE policies (within or outside the BP).

From a theoretical perspective the contributions presented above combine different approaches ranging from an institutionalist perspective (mainly historical institutionalism), to policy transfer and implementation theories.

The usefulness of these studies also consists in the multitude of actors and factors at different levels of the policy-making process. Several studies revealed that the type of policy (e.g., its salience; whether it fits with existing policy approaches; whether it implies certain financial costs or brings and added value) matters in order for the parliament and government in place and the Minister responsible for education to ensure that there is a national legislative framework or regulation which will be used a reference point for further implementation. Several studies have also referred to the importance of policy experts, councils, agencies or other bodies – as middle level policy interpreters – in providing policy input both to the national decision-makers but also to the universities. One of the questions that emerges is to what extent do these factors hold across policy areas, HEIs, and country contexts? This aspect triggered the research presented in this dissertation.

3. Research Design

The present research frames the case of higher education policy in Europe as an illustration of implementing an international (intergovernmental) voluntary agreement. In line with existing trends of exploring compliance and implementation of international voluntary treaties and soft laws, this dissertation aims to question why countries are presenting different levels of implementation with regards to commonly agreed HE policies. The question addressed is a foundational one for policy analysts, political scientists, and HE scholars. The research aims to address the above identified research gap by (1) proposing an analytical framework which allows to reconceptualize and disentangle the process of HE policy implementation and (2) testing it using diverse country cases and HEIs but also specific policy areas. This study seeks to contribute to the broader policy implementation literature in which HE policy is seen as a specific policy area. This section provides an overview on the main aims of this research and the research design employed. It first reiterates the context of the research question and provides an operationalization of the main variables and the method employed. It then presents justification for the country cases and the choice of HEIs in these countries, and the main rationales for the choice of the policy areas examined in this dissertation. In order to enhance the transparency of this research, the section provides details on the data collection process and puts forward a complete list of the interviewees and the main themes addresses in the interviews.

3.1. Central Research Question

The different levels of implementation across the participating countries affect the desired BP' end goals, which are "full harmonization" and policy convergence with regards to the overall commitments - in other words to make the European HE systems "more alike, to develop similarities in structures, processes and performances'' (Heinze and Knill, 2008, p. 498). The idea of an uneven implementation and divergence across countries has been emphasized through the Yerevan Communiqué, where it was claimed that "by 2020 we [the Ministers] are determined to achieve an EHEA where our common goals are implemented in all member countries (Yerevan Communiqué, 2015, p. 1).

Differentiation comes as unexpected if one considers that participating countries expressed openly and repeatedly their willingness and commitment towards implementing the agreed policies. In addition, they are all exposed to the same principles, arguments and

narratives, and the same pressure from the in-place governance structures and/or peers. European integration scholars have provided different reasons for such diverging policy implementation outputs. Among them, the governance system at hand, the specificities of the national contexts, the chosen policy instruments and tools, and their impact on creating a shared understanding and common policy practices (e.g., normative-ideational factors).[31]

Taking into consideration that, on the one hand, BP implementation reports and academic sources show that there is systemic variation in terms of compliance with HE policies and, on the other hand, there is no theoretically grounded and methodological sound explanation for different implementation levels across the participating countries and HEIs, this dissertation asks:

What are the factors explaining the different levels of implementation of higher education policies within the Bologna Process?

The implementation of the BP, as a transnational policy model represents the variable to be explained. In this research, the variation in the dependent variable is demonstrated through the different implementation reports (see section 1.5. and 2.2.) which assess the implementation performance of participating and HEIs. As underlined both in BP policy documents and reports, the different levels of implementation of BP policies represent policy outputs at different levels of the policy-making process. This research uses the concept of implementation in its narrow sense of process and policy outputs (Winter, 2003). Policy outputs "are understood as actions taken in pursuance of policy decisions and tangible results of all constraints, compromises, and conflicts within policy-making" (Kostka, 2015, p. 17). EU level studies have operationalized policy outputs as the volume of legislation and administrative acts produced (adopted) over a certain period (Toshkov, 2011; or Blofield and Haas (2013) on gender equality policies). This dissertation aims to explain the factors affecting the level of implementation of BP policies (outputs) by delving into those stages and mechanisms which are occurring between what is expected for participating countries and HEIs to implement and the actual results (rather than assessing the outcomes or the impact and effectiveness of those reforms).

Implementation in itself can be operationalized by distinguishing between different levels, as follows: *adoption*, *transposition* and *practical* or *institutional implementation* (for a more detailed discussion on conceptualization see chapter 4 below). Adoption materializes when the necessary legislation, which provides a legal framework for addressing the policy

[31] Falkner et al. (2005) – the governance system; Schimmelfennig and Winzen (2017) – the specificities of the national contexts; Ágh (2014) – the chosen policy instruments and tools; Andersen and Sitter (2006) – degree of change and resources the policy to be adopted entails.

issue at hand, is in place. Once the necessary framework is adopted at the national level the next step for the competent authorities is to *translate or transpose* these policy provisions into operating guidelines, action plans strategies, etc. The *practical implementation* phase refers to the stage in which these policies are put into effect at the HEIs level. In principle, the adoption, transposition and practical implementation stage involves solely the country and its HEIs and their willingness and capacity to put in practice what is desired and agreed; nevertheless taking into account the environment in which such policies emerge and develop the framework also explores aspects such as the dynamics between participating countries and the BP structures, non-state actors and institutions involved in policy-making, etc.

As far as the independent variables are concerned, as the above chapter showed, the existing academic literature pointed towards a variety of factors affecting implementation, depending on the country and HE policy context. However, no study has built a comprehensive theoretical framework and/or compared different national conditions and contexts in order to explain the variance in implementation across countries and institutions. As mentioned, one of the envisioned contributions of this dissertation is to draw on different types of literature (e.g., HE studies, implementation, and European integration theories) and evaluate prior explanatory hypotheses leading to different national and institutional implementation levels of HE policies. As such, this dissertation aims to contribute also to the HE policy implementation literature by proposing an analytical framework that allows to dissect different sources of policy change - supranational, national and institutional actors and institutions - and their mechanisms for fostering implementation.

3.2. Within-Case Analysis

The study engages in a comparative analysis as a tool for carrying out within-case analysis. The analysis is inspired by the process tracing methodology (George and Bennett, 2005) based on qualitative data (e.g., description, observations) and on identification of causal sequences (Collier, 2011) in HE policy implementation. The term *causal mechanism* is largely debated. Beach (2016) notes that some use the term to refer to a series of events, or a narrative story, prior to the occurrence of an outcome - this, in Beach's view, does not help in understanding *why* things happened. Furthermore, other scholars argue that there is a need to go beyond tracing events when studying causal mechanisms, and instead develop "narrative structures with action linkages that build on subjective counterfactuals" and ask actors who participated in the process of interest whether things could have happened differently at critical junctures.

First, the study is structured according to theoretically deduced questions. Second, it involves focused comparison. This implies that only certain theoretically relevant aspects of the selected cases are in focus, the emphasis being on the interaction between the theoretically relevant factors. In order to connect factors and outcomes, observations of processes in empirical cases are important. According to Aminzade (1993, p. 108), the researcher has to account for "theoretically explicit narratives that carefully trace and compare the sequences of events constituting the process" of interest. Narratives, Aminzade writes,

> *allow us to capture the unfolding of social action over time in a manner sensitive to the order in which events occur. By making the theories that underpin our narratives more explicit, we avoid the danger of burying our explanatory principles in engaging stories. By comparing sequences, we can determine whether there are typical sequences across cases and can explore the causes and consequences of different sequence patterns* (Aminzade, 1993, p. 108).

This method helps in explaining the diverging and unexpected BP implementation outputs by analyzing how different factors impact the cases under consideration based on sequences of events, decisions and key processes. It aims to examine the necessary and sufficient conditions for the participating countries to implement the BP commitments. It seeks "to identify causes (or combinations of causes) that are common for cases exhibiting a certain outcome and to distinguish these cases from cases with a different outcome" (Ragin, 1987, p. 36). The main idea is to explain the presence of such outcomes, through analyzing the possible causal processes whereby that specific outcome was produced (in this case policy outputs).

Considering that there is no clearly identified pattern of BP implementation across different HE systems, through a multiple comparative study design this dissertation aims to examine three countries that present various implementation levels within the BP: Portugal, Romania, and Moldova. The selection of these cases reflects to a certain extent the contextual factors affecting education policies (Jie, 2016) among which different socio-economic, political and cultural factors (e.g., do formal hierarchies matter, can high officials be questioned or challenged?), structural factors (e.g., unchanging elements of the society), international factors (e.g., factors leading to greater interdependence and cooperation in education between states), but also different situational factors (e.g., focus events- corruption scandals, etc.).

Firstly, the above cases provide fertile ground for exploring whether the time period a country is part of the BP matters with regards to implementation performance (Holzinger and Schimmelfennig, 2012). Both Portugal and Romania joined the BP in 1999, whereas Moldova in 2005. This is in line with the sociological institutionalism argument which contends that with time participating countries acquire knowledge about the BP rules and procedures and

internalize its principles, fact which helps them navigate better through the system. These country cases can also help in testing whether there is a link between the compatibility of the domestic processes, policies and institutions, and the extent to which countries feel pressured to adapt to the BP (Risse et al., 2001).

Secondly, it is worth exploring the role of the European Union institutions and agencies in "interfering" with the BP, and the use of their instruments in enhancing certain policy areas (e.g., funding supporting the development of related QA projects) in their member countries (Huisman and Van der Wende, 2004; Batory, 2016; Dakowska, 2017). All three country cases have different experiences with the EU both time-wise and policy-wise: Portugal became a member of the EU in 1986 (it had long tome to internalize EU's principles and policies – e.g., deeper integration), Romania in 2007 (it had to catch up with EU's policies and had to adjust many of its operational sectors and governance structures), whereas Moldova signed the association agreement in 2014 (e.g., it is not directly exposed to EU's policies). In other words, this dissertation seeks to understand how Europe matters, to what degree, in what direction, at what pace, and at what point of time (Börzel and Risse, 2003).

Last but not least, the different socio-economic and political (Dakowska, 2017; Triventi, 2014) dynamics these countries present, the contexts in which HE policy making processes take place and the type of (higher) education systems represent core dimensions in exploring what matters for complying and implementing the BP agreed commitments. More recently, studies have argued that an analysis at the regional level has been lacking despite the fact that countries with similar cultural, economic and political conditions, like Romania and Moldova, are more likely to lead to policy coordination/convergence/transfer (Heinze and Knill, 2008; Vukasovic and Elken, 2014). Heinze and Knill (2008) highlight in particular similarities in terms of linguistics, historical legacies with regards to HE cultures and policies, political preferences of national governments, problems which the countries may be facing and socio-economic structures.

In Moldova, HE is provided by universities, academies, and institutes of HE. Moldova has around 30 HEIs out of which 18 public and 12 private. With regards to HEIs autonomy, it should be noted that starting with 2016 HEIs have gained financial autonomy, they can also set they own admission processes, educational program and human resources policies. From 2004 to 2010 Moldova continuously increased its funding for education, reaching to 9.5% of the GDP. In the last ten years this has been decreasing reaching recently to 6.5%. Universities are categorized based on the level of studies they provide: category A: BA, MA and PhD; category B: BA and MA; and category C: BA studies. The structure of HE studies varies: 3 or 4 for BA

studies depending on the diploma providing access to HE (*matura* exam diploma or a certificate of general education), and two types of diplomas are awarded upon completion: a BA diploma or a HE studies diploma, with the former one providing access to Master studies (1.5-2 years) and later PhD studies (3-4 years). In the last ten years the gross enrolment ratio in HE in Moldova fluctuated between 38-41%[32].

According to the General Directorate of Higher Education (DGES), higher education in Portugal follows the BP format, split into BA, MA and PhD, with the possibility to opt for an integrated MA (a BA degree combined with an extra master's year). It is structured in two systems: traditional universities (14 public and 36 private), polytechnics (20 public and 64 private) and 6 institutions of military and police HE[33]. According to the EUA 2017 autonomy scorecard data[34] Portugal scores the 7th in Europe with regards to organizational and financial autonomy and the 18th in staffing, respectively 20th in academic autonomy. Besides HEIs' substantial autonomy, national legislation plays an important role in HE regulation (Sin, Veiga and Amaral, 2016) with the state acting as the main regulator, through funding, input control, information. It is also noted that several universities have a foundation status which gives them greater autonomy in some aspects of their activities (e.g., they can borrow money). Access to HE is conditioned upon a secondary school certificate. In the last ten years the gross enrolment ratio in HE had an average of around 64%.

According to the Ministry of Education website, in Romania HE is delivered through around 100 HEIs, which can be universities, academies and institutes, with provisional authorization or full accreditation. They can be public (around 50%), private or confessional, have legal personality and are non-profit, apolitical. HEIs autonomy is guaranteed through the Romanian Constitution and academic freedom through laws. Despite the legal provision allocating 6% of the GDP to education, data from the last ten years shows that this never went beyond 3.2%, Romania being significantly below the EU averages. Depending on their focus, universities are categorized as either (advanced) education and research or only education. In line with the BP, higher education is structured under the model BA (3 years), MA (2 years), and PhD studies (3 years). Annually, the government validates among others the fields and specializations of study programs, the number of ECTS for each study program, and the maximum number of students to be enrolled. Access to HE is conditioned upon a *matura* exam diploma (or equivalent), however HEIs can have additional admission processes. Gross

[32] The gross enrollment data for all countries provided by: http://uis.unesco.org/
[33] General Directorate of Higher Education: https://www.dges.gov.pt/en/pagina/public-higher-education
[34] For details on specific dimensions and methodology, see: https://www.university-autonomy.eu/

enrolment data shows that student numbers have been in decline from 2007 to 2013, and currently a slight increase of around 50%.

To sum up, the focus on countries as a whole would not contribute in providing a comprehensive picture on the factors affecting the implementation of the BP. As the literature review chapter showed, HEIs are crucial elements in this respect. Given the non-binding, voluntary aspect of the BP, decision-makers have the discretion to slow down or to even neglect the national transposition and/or the implementation at the university level. In a similar fashion, assuming the legal framework is in place at the national level, universities might choose to adapt or adjust to the new policies only to a certain extent. Moreover, given their level of autonomy, universities can initiate their own policies which can be in line with the BP goals.

Table 5. Higher education institutions' characteristics

Country and HEI		Type	Location	Level of studies	No. of students	No. of faculties/ departments	No. of academic staff
Moldova	**A**	comprehensive	capital	BA, MA, PhD, LLL	~17000	~10-15	~1400
	B	science and technology	capital	BA, MA, PhD, LLL	~10000	~10	~800
Portugal	**C**	comprehensive	North center	BA, integrated MA, MA, PhD, LLL	~32000	~15	~2500
	D	science and technology	North center	BA, integrated MA, MA, PhD	~13000	~15	~1000
	E	science and technology	North center	BA, integrated MA, MA, PhD, non-degree	~21000	~10	~1500
Romania	**F**	comprehensive	South west	BA, MA, PhD, LLL	~13000	~10	~1000
	G	comprehensive	South	BA, MA, PhD, LLL	~32000	~ 20	~1300
	H	comprehensive	North center	BA, MA, PhD, LLL	~40000	~ 20	~3000

In Moldova, 2 universities have been selected, both of them from the same region, have a similar size, however, they have different profiles: one of them is more comprehensive (mainly focusing on social sciences, natural sciences, law and engineering) whereas the second one has an engineering and economics focus. In Portugal, 3 HEIs have been selected based on their profile and geographical location: for the all of them are public institutions from the North Center regions with advance research and teaching, with one of them including polytechnic

schools. In Romania, 3 universities have been selected, representing different geographical areas and institutional profiles (according to the 2011 EUA institutional evaluation): two advanced research and education universities, and a third university having a research and education profile. The commonality between them is that all of them represent diverse educational centers in the main regions of the country.

3.3. Policy Areas Operationalization: The Social Dimension and Quality Assurance

Besides the country and HE specific factors mentioned above, a second set of explanatory factors for the HE policy implementation variation is the nature of the policy in question: its political salience, how clear or abstract it is conceptualized and the degree of change and resources it entails (Hrebiniak, 2006). This dissertation focusses on explaining the implementation of two different policy areas promoted by the BP, that is quality assurance (QA) and the social dimension (SD)[35]. The preference for these two policy areas has been triggered by the fact that they both constitute BP intentions, QA is one of the main foundations of BP, whereas the SD came on the agenda later on. In addition, they both represent different rationales for the BP: QA was a top down approach (promoted by supranational actors), and was considered a priority of national interest for some of the founding member states, whereas the SD came later on (2001) and it was brought on the agenda by the students.

Moreover, these policy areas are theoretically driven. After assessing how the BP action lines are defined, how they evolved, and after identifying the tools that have been created for their implementation, these two policy areas are good illustrations of the clarity-interdependence typology presented in section 1.4., with QA representing high clarity-high interdependence, respectively low clarity-low interdependence in the case of the SD. The SD is an action line that is not clearly defined and operationalized and creates confusion when compared with other action lines (e.g., student centered learning or lifelong learning). On the other extreme, QA is well defined, operationalized (through the ESGs) and there is a strong (inter)dependency relationship between it and some other BP policy tools and action lines (e.g., ECTS). In sum, the selection of these policy areas contributes in testing the policy clarity and policy interdependency aspect proposed by the implementation scholars (Matland, 1995; Gilardi, 2014; Capano, Pritoni and Vicentini, 2019). Given the specific characteristics of these two policy areas, for the purpose of this research, the section below elaborates on their

[35] For more details see section 1.4.

conceptualization and operationalization. Exploring these two policy areas may contribute in accounting the varied implementation outputs in EHEA

The social dimension

In her book *European Higher Education Policy and the Social Dimension: A Comparative Study of the Bologna Process,* Kooij (2015) provides an account of the development of the social dimension of HE and contends that when it first appeared on the agenda it was an ambiguous item, subsumed under other action lines such as student mobility or LLL. In 2001, the SD was discussed in relation to mobility, and the need to expand it to students who were less likely to be mobile due to their socio-economic background. In 2003, there was an emphasis on strengthening social cohesion and on reducing social and gender inequalities. Two years later participating countries were encouraged to make quality HE equally accessible to all, create appropriate conditions for students so that they can complete their studies without obstacles related to their social and economic background. It was in 2009 when the ministers agreed to commit themselves to set measurable targets for widening overall participation of underrepresented groups, so that in 2015 a national strategy for the SD was required as expressed in the Yerevan Communiqué.

When compared with another action lines such as degree structure or recognition, the SD does not have "clearly defined operational outcomes" (Kooji, 2015). A similar argument is supported by Orr and Mishra (2015), who claim that the SD is "general and unspecific", and it highly depends on the specificities of the local contexts of the countries and HEIs at hand. Despite these, a better conceptualization of the SD has been developed through the data collection mechanisms (implementation reports) but also through seminars and workshops, both of which helped in the development of the SD as a policy item. This dissertation operationalizes the social dimension based on the last two BP implementation reports (2015; 2018), more specifically on the way in which it was assessed and "measured". Among the operationalizations of the SD, the different implementation reports mention:

- the composition of the student body (e.g., parental level of education, rural-urban origins)
- the (non-formal) access routes to HE for different under-represented groups (e.g., minorities or from socially and/or economically disadvantaged backgrounds, from rural areas, released from military service, orphans, women, Roma, with migration and refugee background, with disabilities, mature students, etc.)
- underrepresented groups' retention and completion (e.g., expanding the number of places, quotas, recognition of non-formal and informal learning)

- student services and facilities (e.g., social, psychological and medical support, housing, meals, childcare, counseling and guidance etc.)
- fees and financial support schemes (e.g., loans, grants, reduced fees, scholarships)

More precisely, at the national level this dissertation will be assessing the presence of specific legislation on the above mentioned aspects related to the SD, of a national level strategy and a corresponding structure/agency in charge of ensuring a smooth application of its provisions at the HEIs (e.g., (de)centralized admission procedures and requirements, mainstream or targeted approaches to support disadvantaged students, quantitative objectives for participation and/or completion of disadvantaged students). Considering that HEIs and students are the final targets and beneficiaries of national level policies (Weaver, 2014), this dissertation will also assess how universities embrace such laws, regulations and policies, and how they justify the presence of such policies.

Quality assurance

Quality assurance was part of the BP from the very beginning (1999), however it was not clearly developed. At that time, it was mentioned that participating countries should "promote co-operation in quality assurance with a view to developing comparable criteria and methodologies". In 2003, the European Network for Quality Assurance in Higher Education (ENQA) was asked to develop "an agreed set of standards, procedures and guidelines on quality assurance" and to "explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies", the result was the 2005 ESGs. In the last years, these QA aspects were reinforced, few newer elements have been introduced among which multidimensional transparency tools or a revised version of the ESGs (2015).

Since the ESGs represent the core of what the QA stands for, and they target the work of HEIs, this dissertation will be focusing on the implementation of the ESGs (internal and external) and not QA as a whole. The ESG can be considered as a model or a set of standards and guidelines to be implemented by participating countries with regards to internal and external QA (and also for external quality assurance agencies). Besides their main aim of providing a common frame of reference, a common understanding of QA across borders and among stakeholders, the ESGs aimed at providing assistance in developing a culture of quality and to provide information, and set expectations with regards to the outcomes of HE. It became the main reference tool for quality assurance at the national level. The ESGs put the basis for the creation of the European Quality Assurance Register and the Quality Assurance Fora, which can be considered as further ways to enhance the implementation of the ESGs. Taking into consideration the ever-evolving nature of the BP, including the shift towards student-

centered learning and teaching, it was decided that a revision of the ESG is necessary[36]. As such, in 2015, a clearer and concise version of these guidelines has been adopted. This dissertation looks at the national level legislation, regulations with regards to the adoption and implementation of the ESGs, the existence of a QA agency and the QA situation at the HEIs level.

3.4. Data sources: Document Analysis, Interviews and Participant Observation

In order to examine the policy implementation process and the factors explaining the different implementation outputs, the data for this study has as main sources three types of data. First, it is the available BP related documents and (academic) publications: declarations, communiqués, country specific implementation reports, stocktaking reports, trends progress reports, etc. Secondly, participant observation has been used as a tool to gain a deeper understanding on the different dynamics in BP related events, such as the following:

- May 2018 – Bologna Process Ministerial Meeting in Paris / France.
- February 2018 - Enhancing quality through innovative policy and practice, online webinar.
- February 2015 – Peer Learning for the Social Dimension in European Higher Education (PL4SD) University of Economics and Business, Vienna / Austria.
- November 2016 – Bologna Process Working Group on Implementation, University of Nice, Nice / France.
- November 2017 - The Future of Higher Education – Bologna Process Researchers' Conference (FOHE-BPRC3), Bucharest / Romania.

Thirdly, this dissertation relies on a set of semi-structured interviews or in Beach and Pederson's (2013) terms, *account evidence*. The choice for interviews has been driven by the nature of this research which implies a qualitative approach and by the empirical manifestations of the process under consideration. For example, according to the 2018 Bologna Implementation, when it comes about planning top-level action to implement HE reforms, including those committed to the BP, out of the 28 participating countries in the study just in 22 of them it is required to consult HEIs, in 17 of them it is required to consults students, and in 14 of them to consult systems staff and QA agencies. The same report points out that in 26 participating countries "there is no structural organization overseeing and coordinating the implementation of commitments made in the Bologna Process" (p. 45), with the ministry responsible for HE bearing the task of following up on specific issues. This drives the need for

[36] For a comparison between the ESGs 2005 and ESGs 2015, see https://enqa.eu/indirme/papers-and-reports/associated-reports/EQUIP_comparative-analysis-ESG-2015-ESG-2005.pdf

exploring the direct or indirect contribution of the main actors and stakeholders in the policy-making process.

Recognizing that interviews are the most commonly used sources in comparative analysis, this dissertation relies on a set of semi-structured interviews. Firstly, for each of the selected countries and their HEIs, a list of potential interviewees has been created based on their involvement in the HE policy-making processes relevant for this study, and the respective individuals have been contacted by e-mail and/or phone. Besides this, the dissertation makes use of additional interviews conducted with transnational and European level stakeholders, European level experts, professionals and European level policy networks (i.e., European Students Union) on HE. The interviewees have been selected based on their expertise, capacity and institutional standpoint (formal positions held across time) as key conditions for providing information on key events and processes related to QA and SD policies, how these unfolded over time. In total, 68 interviews have been conducted (in some cases the interview was conducted with more people) as following:

- Portugal: January – April 2018 → 17 interviews (6 with national level actors and 11 with institutional actors)
- Moldova: May – June 2018 → 17 interviews (8 with national level actors and 9 with institutional actors)
- Romania: October – December 2017 → 28 interviews (8 with national level actors and 20 with institutional actors)
- European level: 6 interviews

Considering that respondents' identity is not relevant for this study but rather their contribution from an institutional perspective, their anonymity will be kept. Depending on their area of expertise, interviewees can be categorized as European (*Europe* and the assigned number when referenced in the text), national (country code, *Nat* and the assigned number when referenced in the text) and institutional (country code, *Uni* and the assigned number when referenced in the text). For a complete list of the different institutional profiles of the respondents see Annex 2. Overall, interviews have been conducted with top HE decision-makers, governmental representatives and agencies in the field, HE experts and professionals, national student unions and other affected groups (at the national level), and HEIs' leaders and managers, teachers, student representatives, staff and other administrative units (at the HEIs level). One of the observations here is that some of the respondents had diverse identities over time (e.g., student representative at the European level, academic and national HE expert). A second observation, also a limitation, is that the ratio of national and HEIs respondents is not equally across the countries, especially with regards to top policy-makers. Portugal in this

respect is highly disadvantaged when compared with the other countries, and therefore the empirical analysis for the first two empirical chapters (Chapter 5 and 6) would reflect this. Also, no politicians have been interviewed for this research, or if they were politicians, this is not the primary identity they choose to emphasize during the interview. This poses certain challenges in the analysis of the empirical material, but it will be complemented by existing studies and knowledge in the field.

Interviews were conducted as a way to account evidence for the different chains in the implementation process. The interview guide covered the three different levels of policy implementation corresponding to the responsible bodies and their roles and experiences in the policy-making processes. The protocol for the semi-structured interviews was designed to assess actors' perceptions and beliefs about national and institutional policy changes in line with the BP. The questions were tailored to the above-mentioned groups of interviewees and generally explored among others the legislative/policy component, the administrative dimension of policy implementation, the action component (e.g., what programs have been developed) and the resource component.

In a first phase, interviewees were asked about their current and previous positions relevant to the study, their understanding of the BP and how familiar they are with it, etc. A second set of questions looked at how they have been contributing (or not) to creating a shared understanding of the BP policies, and how have they contributed subsequently to the implementation of those policies at the national or at the institutional level; what they consider as main challenges and opportunities in implementation; how they perceive certain structures and actors with regards to implementation, etc. Finally, respondents were asked about the impact and the future of the BP from the standpoint of their position/job. In short, interviews have been conducted as a way to identify actors and stakeholders' interests and their stances on BP policy issues (see Annex 3 for an interview guide for each category of interviewees).

Respondents' self-selection and their level of access to the events of interest in this research, and the length of time between a specific event and the time of the interview might have posed additional limitations on the richness of the details provided in the interview. In addition, the diversity of the respondents might have been also endangered by the chain-referral technique employed as a follow-up referral from certain interviewees. With this might come the issue of certain interviewees overstating their centrality or minimizing their role (Beach and Pedersen, 2013).

With interviewees' permission interviews were recorded, and written notes were taken during the interview. In Moldova and Romania interviews were conducted in Romanian,

whereas in Portugal in English (with few situations in which an English translator was available). All interviews were transcribed and then translated into English. Before starting the content analysis, a general codebook has been designed for each of the three implementation stages: adoption, transposition and practical implementation. This has been greatly influenced by the literature review section which put forward several expectations with regards to the factors affecting or obstructing implementation. A content analysis of interviews was conducted using NVivo,[37] which helped identify additional recurrent topics and themes for each category of interviewees. All of these have been later assessed with regards to their contribution in explaining the causal mechanisms influencing policy change in line with the BP policies.

[37] Nvivo - a qualitative data software which helps to organize, classify, and analyses unstructured and non-numerical data, which help identify key themes across the interviews.

4. Conceptualizing Policy Implementation: An Analytical Framework

Based on three strands of literature, this section aims to address the existing knowledge gap of researching HE policy implementation within the EHEA and puts forward an integrated analytical framework for understanding the different factors facilitating policy implementation. The uniqueness of the Bologna Process (e.g., voluntary, the mode of governance, the stakeholders involved, etc.) and the context it is embedded in - suggest that understanding BP implementation requires multiple approaches. The framework differentiates amongst three stages of implementation, namely: adoption, transposition, and practical implementation, corresponding to different levels/degrees of implementation at the national and institutional level.[38]

The first part of this section begins with a discussion on the meaning of implementation, sets up the context of the analytical framework and provides a general overview of its main components. The section continues by delving into the supranational and transnational setting of the BP and emphasizes the main functions and roles of the BP structures, and how they affect the national level implementation. The next parts of this section focus on adoption, transposition, and practical implementation. These subsections start with a conceptual clarification of each of the implementation levels and the expected causal mechanism, followed by a short description of the roles and responsibilities of national governments, HEIs and stakeholders in policy-making processes at the BP level, at national and institutional level. Based on the different roles actors and structures have, each of the subsections puts forward a set of factors affecting adoption, transposition and practical implementation, as revealed through implementation theories, EU integration studies and HE policy studies (see section chapter 2). Drawing from different strands of literature each of the subsections formulates a set of relevant hypotheses and the factors affecting implementation for each of the three levels. Last but not least, the chapter points out the limitations of the proposed framework and the potential overlaps between each of the levels.

The establishment of a contextualized format of BP implementation serves several purposes. First, it maps the governance structures of the BP and the involvement of transnational and domestic actors in such structures. Secondly, it delineates levels of policy responsibility and delegation in European and national HE policy-making processes. Based on

[38] See Jentoft (2014) for a similar approach for explaining environmental agreements implementation; or Toshkov (2011); Dimitrova and Steunenberg (2017) in EU studies.

the different roles actors and structures have, a causal mechanism is outlined for each of the implementation levels containing some of the factors supposed to contribute to the specific policy implementation output.

At the BP level, its main structures (e.g., Board, WGs, etc.), including the consultative members and partners, are responsible for three main activities which have a direct impact on policy implementation: decision-making and support, policy formulation and design, monitoring and evaluation. At the national level, top decision-makers and national-level politicians are responsible for participating in the BP decision making structures, and for adopting the commonly agreed commitments at the national level (through legislation and administrative acts). At the administrative level governmental agencies and bodies, societal actors, and the academic community account for representing the country in BP structures (e.g., Working Groups) and inform national level policy-makers about the main developments at the supranational level and contribute to national level policy-making. Likewise, the same actors are expected to participate together with HEIs representatives and students in the BP socialization processes (e.g., seminars, trainings) and exchange practices and working methods in line with the BP promoted policies affecting the choice for specific policy instruments and implementation mechanisms. Last but not least, ministers, governmental agencies and bodies in the field of HE are the most legitimate actors to contribute to the transposition of the BP action lines into action plans, strategies, measures or concrete policies.–At the HEIs level, rectors and top-managers, academic and administrative staff and students account for developing institutional plans and policies which are in line with the national and BP level policies; for contributing and participating as stakeholders in the national and supranational HE policy-making processes; and for ensuring the practical implementation of that policy.

To summarize, Table 6 presents the multi-level, multi-actor policy design of the BP (adapted from Chou et al., 2017; Matei, Craciun and Torotcoi, 2018). More precisely, "the policy implementation of BP is associated with the construct of multi-level governance system(s) through the articulation, interaction and coordination of processes of policy making and, especially, implementation of European policies at different scales or levels. This view assumes that policy implementation is best seen as part of a larger process that is occurring at different levels" (Sin, Veiga and Amaral, 2016, p. 67). Nevertheless, as mentioned, this type of setting is not only about levels, it is also about institutions and actors and issues. As far as the actors are concerned, the literature suggests that one must acknowledge on the one hand, the heterogeneity of "legitimate/ formal" supranational bodies and structures; on the other

hand, the state and its many composite institutions, as well as the involvement of non-state actors in this policy domain (Chou et al., 2017).

Table 6. The Bologna Process policy model

Bologna Process policy-making levels	**Policy stages**	**Responsible parties**
Supranational level	Agenda setting Decision-making	Bologna Process structures
Country level	Adoption	State level
	Transposition	Administrative level
	Practical implementation	Institutional/ University level
System wide	Convergence/ Integration	Participating countries

(Source: developed by author)

As table 6 shows, the first step within the BP supranational policy-making processes is setting the agenda (mainly through the help of follow-up groups) and deciding on the communiqué or declaration to be adopted within ministerial meetings. The next ideal phase would be the adoption of the necessary legislation at the national level, to provide a framework for addressing the policy issue(s) at hand. Adoption is defined as formal implementation and refers to the incorporation into national laws and regulations of specific policy provisions, principles, action lines, or directives (Haverland and Romeijn, 2007). Simultaneously (or not), the competent authorities (e.g., governmental agencies and experts) translate these policy provisions into operating guidelines, action plans, strategies, etc. (transposition). Once the necessary framework is adopted at the national level and clear guidelines are in place, the next step implies that these policies are put into effect at the HEIs' level (practical implementation).

Failing to incorporate these stages from the side of participating countries, can undermine the legitimacy of those common policies and may have a negative impact on the effectiveness of the overall process (convergence). Or, as Sin, Veiga and Amaral (2016) put it, "the final configuration of EHEA depends on the aggregate results of the reforms of national higher education systems" (p. 153). Reaching the common objective of convergence, harmonisation, compatibility, comparability and the creation of a common European Higher Education Area requires to explore what the driving forces are which stand between what is intended (the commonly agreed policies) and what is expected (outcome/convergence). This dissertation aims to explain the factors affecting the level of implementation of BP policies (outputs) by delving into those stages and mechanisms which are occurring between what is

expected for participating countries and HEIs to implement and the actual results (rather than assessing the outcomes or the impact and effectiveness of those reforms).

While the BP ministers establish common commitments through their participation in the BP ministerial meetings, it is assumed they will further pursue different strategic targets, measures and policies which are aligned with the commonly agreed BP policies (action lines). Considering the current European and international trends, the government is not the sole provider and regulator of HE, it has not lost its authority, it has transferred it to other actors (e.g., the private sector, the non-governmental sector) (Beerkens, 2003). Indeed the government plays a central role in stimulating change at the institutional level, and this has been strengthened by supranational developments influencing national agendas: "policies designed at European and national levels have been shaping HE's purposes, norms and values, and structures and organizations" (Musselin and Teixeira, 2014, p. 5). Given the non-binding aspect of the BP, participating countries have the discretion to slow down or to even neglect the transposition and implementation phases (therefore, the differentiated integration phenomenon).

Moreover, it can be argued that most of the times, universities expect governments to take a stand with regards to HE policies and as such, the (in)existence of state level policies preconditions what happens at the HEIs level (Craciun, 2019). Nevertheless, practice has shown that a country can have in place the required legal frameworks however, there is nothing concretized in terms of actual policies at the HEI level. In a similar fashion, assuming the legal framework is in place at the national level, HEIs might choose to adapt or adjust to the new policies pretending to align their behavior with the prescribed rule (Batory, 2016). Considering these issues, one should look at the country-specific factors and differences that can affect the implementation of HE policy.

In the next sections, based on the above, the proposed analytical framework will be detailed by scrutinizing each implementation stage - adoption, transposition and practical implementation - from the perspective of what matters in BP implementation. Based on these, the proposed framework structures the analysis at two levels: countries as units of analysis (adoption and transposition) and HE institutions as sub-levels of analysis (practical implementation). Differentiating between three levels of national implementation represents a more integrated approach for researching the different implementation outputs, since the BP relies mainly on national and institutional elements (Sin, Veiga and Amaral, 2016).

4.1. Adoption, Transposition and Practical Implementation

The BP studies presented in the literature review section, provide useful insights into the factors affecting the implementation levels of specific policies. Even though no study has built a theoretical framework and/or compared different national conditions and contexts in order to explain the variance in implementation across countries and HEIs, existing studies put forward different sets of factors affecting implementation however, they do so in an unsystematic manner.

Looking at implementation theories and studies, it can be noticed that several classic scholars point towards the key factors perceived to lead to different implementation outcomes (Pressman and Wildavsky, 1974; Sabatier and Mazmanian, 1979). Among these factors there is the lack of clear policy objectives which leaves room for interpretation, adaptation and/or discretion (Hrebiniak, 2006); the interdependence of actors (and their autonomy) and/or resources; a lack of coordination and defined responsibilities between implementing agencies or various branches and levels of government (Matland, 1995; Berman, 1980; Hjem and Hull, 1982; Spillane et al., 2002). Other scholars argued that the *de facto* situation should be considered when designing and implementing policies (Lipsky, 1980; Treib, 2014). Implementation studies have moved from listing factors to models of policy implementation and combine top-down and bottom-up perspectives (e.g., Elmore (1985) backward mapping; Matland (1995) ambiguity-conflict model, etc.), and later, to integrating the macro policy-making level with the micro level of implementers (McLaughlin, 1987).

To explain the different levels of implementation within the BP policies, this chapter develops an analytical framework which can capture the BP implementation context. Grounded in implementation theories like the above and complemented by concepts and analytical approaches from HE policy research, the proposed framework is backed-up by existing research on the implementation of voluntary agreements (e.g., international voluntary agreements in the field of environmental protection) and soft law in the European Union. The framework integrates top-down and bottom-up approaches to policy implementation, and both the macro (e.g., central actors' role in developing policy goals and frameworks) and micro (e.g., implementers' reaction to goals and frameworks) dimensions of BP implementation (Berman, 1978).

The BP has been understood by policy-makers and stakeholders as a top-down linear model in which policy-makers postulate policy objectives and goals which are later put into practice at lower levels (participating countries need to adopt those policies, decide on the

mechanisms needed to foster implementation at the HEIs level, and then monitor and report on HEIs performance). The OMC adopted to implement the BP also assumes policy implementation is a logical and rational top-down linear process (Veiga and Amaral, 2006). Moreover, most of the academic studies take a top-down perspective and explore how national governments react to the BP policies, and how these relate to national circumstances and priorities. The underlying assumption of the top-down implementation literature is that actors at the top (either at the BP level or country level) can control what happens in the implementation chain (Matland, 1995; Mazmanian and Sabatier, 1989).

In the case of HE policy this view remains incomplete, and this is mainly because HEIs have a certain degree of autonomy which questions the "rational top-down linear process" of this approach. Similarly, domestic actors contribute in shaping the BP by participating in different BP structures and policy-making processes. The bottom-up scholars argue that in order to understand the reality and the process of policy implementation one should look at the policy deliverers. In the field of education, administrative staff, HEIs' governance units and academics have a direct impact on implementation (Oddeen, 1991). The bottom-up implementation literature theorizes that implementation outcomes are the results of interactive processes involving various levels of government including the street level bureaucrats who may distort or modify initial policy goals and objectives (Lipsky, 1978; May and Winter, 2009). However, this strand of implementation literature remains incomplete without referring to the role of non-traditional, non-governmental or social actors in the policy-making process (cf. the role of EC in higher education policy making at the HEIs level - e.g., Batory, 2016; Martens et al., 2004).

The framework proposed in this study combines different sets of relevant literature, including implementation literature like the above, Europeanization and European integration studies, complemented by relevant concepts and analytical approaches from HE policy research, in order to put forward some of the possible factors and mechanism affecting BP's implementation. Implementation is a process in which a given norm is put into practice (Batory, 2016), and it involves the carrying out of a policy decision (Matland, 1995). It "encompasses those actions by public or private individuals (or groups) that are directed at the achievement of objectives set forth in prior policy decisions" (Van Meter, 1975, p. 447). Implementation is situated between the formulation of a policy and the (un)intended effects of that policy. It also refers to the stage of policy-making through which adopted policies are put into effect. In the case of HE policy, Veiga et al., (2015) claim that "the perspective of policy implementation

processes is that of policy enactment in the meaning of realizing policy through practice" (p. 67).

Winter (2003) claims that implementation as a concept has been used to refer to many of its dimensions, including to the implementation processes, its outputs and/or outcomes (e.g., effects). In this dissertation, implementation is used more narrowly as a process with certain outputs. This choice has been driven by (1) the setting of international voluntary agreements in which states or other subjects commit to act as a unit for a common goal; and (2) by the different levels of BP implementation across countries and HEIs (the policy outputs operationalized as *performance*) and by the multi-level setting of the BP (supranational, national, and institutional; see section 4.1.). As an umbrella concept, in this study implementation covers adoption, transposition, and practical application[39]. This was inspired by studies using a similar approach for explaining for example, the implementation of environmental agreements (e.g., Jentoft, 2014) or EU law and directives (see Toshkov, 2011; Dimitrova and Steunenberg, 2017). The different levels of implementation across IVAs, EU directives and law, or even with regards to the BP have been referred to in various ways. Some studies use the term *compliance* (e.g., Cardoso, Tavares, and Sin, 2015) and its different variations[40], some studies use *adoption* and *transposition* when referring to implementation (e.g., Toshkov (2012) on EU law in Central Eastern Europe; Falkner et al., (2005) on EU social policy, or Treib (2014) on EU governance outputs in general).

Even though compliance and implementation are often used interchangeably, the two concepts convey distinct meanings (Treib, 2014). Compliance as a term is most often used in the legal scholarship. It is argued that compliance, from an international law perspective, occurs if member states behave rationally, according to their self-interest, but at the same time, they are concerned about their reputation and the possible sanctions. Weaver (2009) defines it as behavior which is consistent with the objectives of the policy, that is in the way that program designers intended and wanted. Compliance denotes the conformity of behavior with a prescribed rule (Batory, 2016, p. 688) or policy targets' reactions to regulation (Feldman, 2011). In short, implementation is interested how a given norm is being put into practice, while compliance in the outcome in terms of rule conformity.

[39] The European Parliament defines implementation as both transposition and application/ practical implementation:
http://www.europarl.europa.eu/RegData/etudes/STUD/2017/596799/IPOL_STU(2017)596799_EN.pdf

[40] The literature identifies several types of compliance (e.g., Batory, 2016). Haigh (1992) for example, differentiates between formal compliance or the legal process of transposition, and practical compliance or the extent to which the goals have been achieved.

Adoption is defined as formal implementation and refers to the incorporation into national laws and regulations of specific policy provisions, principles, action lines, or directives. Transposition refers to the incorporation of the adopted policies into specific measures. It deals with the details of the adopted policy including budget, timelines, specific targets, monitoring and evaluations, possible sanctions, exceptions etc. Practical implementation refers to the establishment of the necessary tools and instruments, monitoring and compliance mechanisms at the lowest institutional level. It refers to the application of the transposed measures with the intention to produce some change on the ground, by adjusting the behavior of the target group.

The subsections below (4.2.1., 4.2.2., and 4.2.3) focus on each of the three implementation levels. Each of the subsections starts by providing a conceptualization of the term used and how it can be operationalized in practice. Next, based on the main theoretical approaches mentioned above and, on the roles, and responsibilities of domestic actors, stakeholders, and institutions, for each level several structural and actor-centered factors are hypothesized.

4.1.1. Adoption

This subsection focuses on adoption. After providing a working definition of the concept, the subsection argues that adoption can be a result of domestic actors, implementing actors and target groups' participation in the BP decision making structures, the type of government involved in the legislative processes, and the characteristics of the policy to be adopted. The causal model predicts that if BP policies have the support of top domestic actors and structures, this may push the national policies closer to the ones promoted by the BP. As a result, BP structures prefer to collaborate with those domestic actors who are in favor of its policies.

Assessing the existing BP implementation studies, it can be observed that most of them focus on the BP implementation situation at the national level, with a focus on adoption or transposition (Vögtle, 2014; Huisman, 2019).[41] In EU studies, the term *transposition* is used to refer to the "measures taken by member states to incorporate an EU legal act into national

[41] Based on a literature review, Huisman (2019) summarizes eleven factors contributing to the adoption of BP policies among which: the existence of (additional) financial incentives: the envisioned favorable status in the European arena: whether the adaptation requires grass-root level change or not; the response from the main actors; the associated administrative capacities, institutional legacies, and existing domestic rules; whether the process is legitimate and actors can identify with the European initiative and/or participated in European epistemic communities and issue networks, but also the extent to which domestic systems are open to international influences (international experts, foreign solutions imported) prior to the European initiative.

law"[42]. It refers mainly to the incorporation of EU directives into national legislation. Unlike in the EU policy-making, where laws have been previously adopted through ordinary legislative procedures, followed by timely and correct transposition at the national level (meeting the set objectives), this research uses the EU terminology in a different manner. This is mainly because the BP ministerial meetings do not follow the same decision-making procedures like in the EU and they do not have any legal basis.

Adoption, therefore, is materialized when there is an explicit policy at the national level or when the necessary legislation, which provides a legal framework for addressing a specific BP policy issue is in place. This would imply that participating countries are willing to enhance policies which act in ways that are consistent with the goals and objectives intended by the BP policy makers. As mentioned above, adoption is the first stage in implementation. It is defined as formal implementation and refers to the incorporation into national laws and regulations of specific policy provisions, principles, action lines, or directives (Haverland and Romeijn, 2007). In contrast, transposition deals with the details of the adopted policy including budget, timelines, specific targets, monitoring and evaluations, possible sanctions, exceptions, etc. While this research treats the terms as distinct, it acknowledges that there is a certain extent of overlap between the two both as process and as content. Sometimes, transposition occurs prior to adoption, meaning that a thorough analysis and calculations have been made before something is being debated and adopted legally. In other cases, legislative amendments take place over time in order to update existing regulation.

This chapter hypothesizes that adoption can be a result of several factors including: (A1) Participating countries' (or national representatives) meaningful participation in policy-making processes between the ministerial conferences, and their bargaining power in putting on the BP agenda issues they consider relevant for their national HE context, contributes to the likelihood of BP policies' adoption at the national level; (A2) The incorporation of implementation actors and target groups into the decision-making processes at the BP level and their support affects the adoption of the BP promoted policies, since they can contribute by pressuring top decision-makers to back up their commitments. Taking in consideration that the main responsible body at the national level for HE policy adoption are national governments, the type of government and its ideological preferences is crucial in adopting HE policies in line with the agreed ones at the BP level; (A3) The more governments' preferences are aligned with the BP commitments, the higher the speed with which BP policies are adopted; Last but not

[42] See: https://eur-lex.europa.eu/collection/n-law/mne.html

least, (A4) the policy to be adopted matters from various perspectives, including whether it fits or not existing policies, institutions or practices, whether it is needed to solve an existing problem, and whether it is clear what it aims to achieve and how it should be put in practice. It follows that the degree of complexity, fit and clarity of BP policies considerably influences the adoption stage.

At the national level, top decision-makers and national-level politicians are responsible *for participating in the Bologna Process decision making structures*, and for *adopting the commonly agreed commitments at the national level*.

Before proceeding further, it is worth discussing the role of supranational actors and the BP structures in fostering implementation, and the importance of actors' dynamics when it comes to decision-making and their contribution in the choice of implementation instruments and tools. BP structures (e.g., the Board, WGs, etc.), including the consultative members and partners, are responsible for three main activities which have a direct impact on policy implementation: decision-making and support, policy formulation and design, monitoring and evaluation. These roles are crucial in understanding how policy-making and implementation relate to each other. One of the most important activities the BP structures are responsible for is decision-making. Every two or three years Ministerial Conferences are organized in order to decide on the new steps to be taken and to assess the progress made within the BP. However, the BP cannot be reduced only to the work done by the ministers of education or country representatives participating in the ministerial meetings. Its 60 parties are organized through different structures including a Bologna Follow-Up Group, a Board, a Secretariat, different working groups and consultative bodies – all with the role to support decision-making and oversee the implementation process.

Two aspects are important with regards to the decision-making and policy design. First, the literature on the role of policy networks in policy formation (Peterson, 2003) argues that public policies are made via hybrid arrangements involving a range of different actors. Policy networks can be defined as clusters of actors with an interest, or 'stake' in a given policy sector and with the capacity to help determine policy success or failure. The concept of policy networks was developed as a way to try to describe, explain and predict the outcomes of policy-making via such hybrid arrangements. Secondly, the ministerial conferences - attended ideally by highly ranked individuals with a clear political mandate - are crucial for top-decision makers to put forward their policy preferences. According to Vukasovic, Jungblut and Elken (2017), the ministerial conferences are the venue of final negotiations about the policy content of the BP ensuring that the outcomes correspond to ministers' preferences. Such conferences have a

symbolic and ceremonial value since they can be considered "as a signaling device of the importance of European coordination in HE and of the importance of particular actors" (Vukasovic, Jungblut and Elken, 2017, p. 1422). Ministries, it is argued, have a stronger capacity to lobby and influence other actors (as compared to lower level bureaucrats) and they are also the ones that can have the role of veto players. Bergan and Deca (2018) point out that in the last 2-3 ministerial meetings there has been a declining political interest from the ministers' side, with a decreasing number of ministers participating in person. The authors argue that this might be driven by the "lack of new politically appealing commitments that would make the Bologna Process more attractive within national debates" (Bergan and Deca, 2018, p. 298).

With regards to policy formulation, it is noticeable that cross-national HE policies are almost always phrased in fairly broad ways so as to give flexibility to participating countries to adjust according to the local needs. In this case, it is understandable that policies are more ambiguous and broadly formulated, however some of them might have clearer recommendations and action directions. According to Hrebiniak, (2006), the policy formulation stage is crucial, even if there is a good execution from the side of the implementers, unclear formulation (with specific objectives) will lead to failure or unintended results.

A third activity the BP structures are responsible for is monitoring and evaluation. Even though supranational pressure (Tallberg, 2004; Börzel and Risse 2003) is not a strong component within the BP, through supranational influence, benchmarking and reporting, naming and shaming (Pollack, 2005) the desired effect of compliance with the agreed policies is created. Besides identifying and defining common goals and translating common objectives to national and regional policies, the BP includes the establishment of indicators and benchmarks for assessing progress towards the desired goals and therefore, asks for periodic monitoring, evaluation and peer review as mutual learning processes.

(A1) Participating countries' meaningful participation in policy-making processes and their participating bargaining power

As far as the *participation of national representatives and stakeholders in the Bologna Process decision making structures* is concerned, several aspects are worth mentioning as potential explanatory factors driving implementation. Dakowska (2019) argues that in order to understand the complexity of HE governance, it is important to consider both the supranational BP dimension (e.g., structures and working groups) and the domestic dimension, and at the same time to explore the relationship between the different expert groups and with the

supranational level and the national HE policy-making systems. One of the first factors with the potential to impact adoption is participating countries' (or national representatives) *meaningful participation in policy-making processes* between the Ministerial conferences and their *participating bargaining power* (Moravcsik, 1998; Peters, 1993) in putting on the BP agenda issues they consider relevant for their national HE context (policy upload).

Their bargaining power in uploading policy preferences (Vukasovic, Jungblut and Elken, 2017; Moravcsik, 1998) would reflect national needs and interests but also strategic goals (e.g., enhancing competitiveness) [43]. Deliberations in this sense can lead to a change of attitudes among participants, even among those with rather fixed preferences, especially when they incorporate various domestic actors (Hoareau, 2009). The new institutionalism raises questions about the institutional factors that are influencing actors' and stakeholders' preferences and utilities, all of which are providing solutions to the problems member states (or a group of members) are dealing with. According to Hall and Taylor (1996), actors have a fixed set of preferences based on which they behave instrumentally as to maximize the accomplishment of those preferences, and therefore they do it "in a highly strategic manner that presumes extensive calculation" (p. 12). Moreover, "what prevents the actors from taking a collectively-superior course of action is the absence of institutional arrangements that would guarantee complementary behavior by others" (p. 12). This idea reflects the strategic interaction aspect and its effect on influencing specific outcomes. Rational choice institutionalists claim that actors' behavior is determined not by historical forces but by a "strategic calculus" that is a kind of cost-benefit analysis, including assumptions on how other actors might behave.

The final outcome of BP deliberations, the declarations or communiqués, can greatly impact national policies (Sabel and Zeitlin, 2007), however, research has shown that in the early years of the BP deliberations were not the sole factor explaining the implementation of national reforms (Hoareau, 2009). It is argued that the BP is often used by national delegates to further national political objectives: "you put something on the agenda because it suits your own domestic needs (…) It creates a pressure to follow up a commitment you made in the first place. It is a bit of a chicken and egg question" (Harmsen 2015, p. 790).

The various national representatives and organizational structures involved in the BP provide evidence about the political interest in the process, their stance of HE policies, and the ways decisions are arrived at. Besides the ministerial meetings, there are several other actors

[43] On preferences, see Schimmelfennig and Sedelmeier (2004).

parties organized through different structures including a Bologna Follow-Up Group (BFUG), a Board, a Secretariat, different working groups and consultative bodies – all of which have diverse membership in terms of country representatives, and a clearly defined role in supporting the background policy development (Torotcoi, 2017). Most of the times, if there is a certain level of interaction between analysts (e.g., the WGs) and stakeholders about the course of the action, both commit to such recommendations (de Bruijn and ten Heuvelhof, 2002). The findings and recommendations about which consensus is reached "will be more directive for the decision to be made than those about which there is dissent" (de Bruijn and ten Heuvelhof, 2002, p. 233). In sum, the process of drafting and negotiating a BP policy direction is important not only for understanding its contents but also for knowing if implementation problems might be related to the decision-making process.

(A2) The incorporation of implementers and target groups in the Bologna Process decision-making structures

A bottom up strand of implementation literature stresses *the need for implementation actors and target groups to be incorporated into the decision-making processes at the Bologna Process level* in order to avoid political decisions that are out of step with the reality on the ground. In addition, it is widely known that public administrators are involved in the political process, both at the policy level (advising legislators on policy options) and at the program level (using administrative discretion in the implementation process) (deLeon and deLeon, 2002, p. 481). Yet, practice shows that those with implementation responsibility do not usually participate in the decision-making processes. They are often the receptors of orders regarding the policy change, with little opportunity for input into the decision-making process, and thus little sense of ownership of the policy decision (Crosby, 1996). Furthermore, according to Kingdon (2003) actors and stakeholders - political and elected actors, interest groups and researchers, ministers and civil servants - are considered the main drivers of agenda setting. Governmental actors most of the times have exclusive formal authority of decision-making processes. Those actors who are more visible are also more influential in bringing issues on the agenda, whereas the hidden actors are more influential in the generation of solution alternatives and preparation of detailed policy proposals (Kingdon, 2003, pp. 69–70). As Yagci (2014) puts it, "if an issue is pushed into the agenda by visible actors, it has a higher chance to rise in the agenda and if visible actors do not pay attention to an issue, its chance to rise deteriorates" (p. 512).

Involving all relevant domestic actors in the preparation of the supranational policy-making processes can lead to smooth implementation otherwise they might resist during the downloading process (Schneider and Ingram, 1993). According to Lažetić (2010) academic representatives at the national level should be more involved at the international level, especially around the ministerial meetings. Lažetić (2010) contends that the presence and involvement of stakeholders in the decision-making process at the European level was of crucial importance for the successful implementation of the BP reforms in the national contexts.

(A3) The type of government and its ideological preferences

At the national level, top decision-makers and national-level politicians are responsible also for *the adoption at the national level of the commonly agreed Bologna Process action lines*. In line with the intergovernmentalism theory, states are the primary actors and drivers of policy contributing to explain BP implementation (Neave and Maassen, 2007). Most of the times, politicians, top-decision makers at the national level, but also other types of formal political-administrative institutions, state agencies with a certain competence in HE policy have the lead role in setting up the policy-making agenda and in initiating policy change. Nonetheless, the decision-making stage is considered as a top-down, non-participative process, restrained to a narrow set of national decision makers and implementing officials. From the perspective of new institutionalism, public policies are not only the result of politicians' or policy-makers preferences but also of the constraints in which these types of actors operate, that is the political institutions which have been designed to constrain the political power. However, the political institutions of a country, along with cultural norms and certain paths of previous behavior, affect the policymaking process. Accordingly, Musselin and Teixeira (2014) contend that "changes in higher education are shaped by national contexts and debates, and the design of higher education policies is embedded in national cultural, societal and political contexts" (p. 7).

It is widely known in the political science literature that the *type of government* has a direct influence on the type of HE policies promoted (Capano, Pritoni, and Vicentini, 2019; Hauptman Komotar, 2018). Zahariadis (2007) argues that the policy formation stage, including the decision-making stage, must include the variable of governing parties' ideology. The type of government (Dar, 2012; Moscati, 2009) and its ideological preferences prove to be important when it comes about the adoption of national level frameworks and laws (similar findings have been shown to matter in the implementation of the BP in Italy – Moscati, 2009). As Braun and

Gilardi (2006) put it, the ideological preferences of politicians, the political constraints they face in adopting policies, and their expected popularity are likely to affect the speed with which policies are adopted and spread.

(A4) The characteristics of the policy to be adopted

Another consideration refers to *the characteristics of the policy* to de adopted. The first characteristic refers to the worded provision of the policy (Blofield and Haas, 2013**)**. While some countries take the BP policies verbatim when adopting, others reinterpret them before adopting. This reinterpretation might be due to the legislative process which often requires "ambiguous language and contradictory goals to hold together a passing coalition" (Matland, 1995, pp. 147-148).

Within the BP there are elements which are more ambiguous and undefined leaving greater flexibility to both governments and HEIs to make decisions. This aspect is also found in the literature, where it is stated that the complexity of a policy or a program (multiple goals, issue salience, possible side effects, and outcome predictability) affects its transferability (Dolowitz and Marsh, 1996). Considering the above, having a clear understanding of the characteristics of "what" is transferred makes for a more nuanced understanding of the results.

Paul Cairney (2011, p. 35) in his book "Understanding Public Policy: Theories and Issues" provides several criteria which can help in explaining the array of implementation success or failure. For Cairney (2011) the policy objectives should be clear, consistent and well communicated and understood by the policy protagonists and targets. The inability of policymakers to formulate and design clear and stable directions with respect to the desired policy change can undermine local implementation (Mazmanian and Sabatier, 1981; Pressman and Wildavsky, 1974). The idea of policy "haziness" can be a function of consensus in the policy making process, but it can also be a function of the "sensitivity" of the policy area one is concerned about.

According to Thoeing (2007) "the current outcomes of public policies do not reflect the mere preferences or interests of the current stronger competitors. They are rather channeled by the existing and past institutional arrangements in which competition takes place. Policy choices made in the past shape policy choices made today" (p. 91). Current policies can be a result of path dependencies and "periods of continuity punctuated by 'critical junctures'" (Hall and Taylor, 1996, p. 7). Historical institutionalists argue that the context of a situation is given by its past as shaped by state capacities or policy legacies (*Ibid*., p. 9). In contrast to this perspective, policy outputs can be also a result of the degree of fit (Risse et al., 2001), meaning

that adaptation to foreign/international/supranational policies depends upon the extent to which these fit in national processes. If the BP policy fits in well with the policy, processes and institutions of a country there will be no impact and things can go on as they were before or can slightly adjust. Yet, domestic adaptation is more likely to happen in case of a misfit, the lower the compatibility between the BP and the domestic processes, policies and institutions, the higher the adaptation pressure. Versluis (2004) astutely argues that the degree of issue salience, can foster administrative adaptation at the national level.

In the same line, the policy issue salience, or the problem specific pressure (Knill and Lenschow, 1998) at the national level can be more relevant when explaining what affects adoption. The policy issue salience is most of the times backed up by national sociopolitical conditions among which the domestic demand for change (Pechar and Pellert, 2004) but also national governments preferences, priorities and interests (e.g., the quest for quality higher education in CEE) (Kwiek and Maassen, 2012).

To summarize, the proposed causal mechanism claims that at the intersection between BP supranational policy-making and the national delegates adoption is the result of policy fit between commonly agreed policies at the BP level and national preferences and interests as resulted through national representatives participation in BP decision making structures and their bargaining power in uploading specific policy preferences.

4.1.2. Transposition

This subsection focuses on transposition. It starts by providing a conceptualization of the notion and how it can be operationalized. Next, based on the roles and responsibilities of domestic actors (e.g., governmental agencies, ministerial units, etc.) in charge of supporting this implementation phase, several structural and actor-centered factors are hypothesized as affecting transposition: domestic actors' participation in the BP policy-making processes and their contribution to national level policy-making, the organizational socialization processes the HE community participates in and its support to policy-makers; and implementing organizations' decision-making authority, discretion and capacity. The corresponding mechanism states that mutual learning and other socialization processes equip governmental agencies and bodies, societal actors, and the academic community with information about the main developments at the BP level and contribute to national level policy-making by feeding back national policy makers.

Konig and Luetgert (2009) view transposition as the second stage in the national implementation process, which is after a country concedes to cooperation with supranational

agreements through national legislation. Transposition deals with the details of the adopted policy including budget, timelines, specific targets, monitoring and evaluations, possible sanctions, exceptions etc. The incorporation - or transposition – of the adopted policies into specific measures or methods predetermines the subsequent moves in implementation. Without proper transposition, a policy will not be fully integrated into the national legal order (Steunenberg and Rhinard, 2010). Transposition can be understood as the separation of a policy from the political to the administrative level, from the top decision makers to the different layers in the administrative system (e.g., formal political-administrative institutions and state agencies, representative organs and structures) with a certain competence in higher education.

Transposition as an outcome can be handled at the ministerial level by adopting a ministerial order or similar instrument, or at cabinet level by adopting a government decree or similar instrument (Steunenberg and Rhinard, 2010). It is materialized through government decrees, ministerial orders or lower-level legal instruments which "do not require the involvement of the legislature but can be formulated and put in place by the executive branch of the state" (Ferrazzi and Rohdewohld, 2019, p. 77).

Steunenberg (2006) emphasizes that the national legal system gives policy-making power to different political and administrative actors, either through constitutional provisions or through delegation. Accordingly, decision-making on transposition consists of processes at different levels in which various actors play a role. Steunenberg (2006) approaches transposition as a process taking place at two distinct levels, each with different players: lower-level (e.g., civil servants in ministerial units) and higher-level (e.g., ministers, cabinet ministries, administrative bodies, coalition parties in parliament involved or responsible for overseeing the transposition process) players. In a first phase higher-level players delegate decision-making on transposition to lower-level players because they do not have the time, capacity and expertise to make policies on those policy issues. Steunenberg (2006) uses the notion of policy-specific players to refer to those who formally or informally have the authority, the right or the discretion (Steunenberg and Toshkov, 2009) to draft or to support a transposition proposal. In a second phase, lower-level players try to agree on a measure transposing a policy. The higher-level (or coordinating) players intervene when the lower-level players cannot agree on how to transpose a policy or certain aspects of it.

Although politicians have the lead role in initiating policy change, lower level bureaucrats and/or technocrats are the ones involved in the formulation of the policy changes. Often, the latter group does not possess the same decisional criteria as politicians and does not aim to balance constituencies' interests but to ensure that the output is maximized, and

resources are rationalized. Moreover, transposition is influenced by differing administrative procedures, reflecting different patterns of consultation, coordination, and decision-making (e.g., external stakeholders such as interest groups are involved, depending on the procedures used in a particular policy area) (Steunenberg and Rhinard, 2010). The argument is that political and administrative actors at different levels of government shape the outcome of transposition, but that they do so within sector-specific boundaries (e.g., legitimacy, mandate-based competencies). Transposition predetermines the subsequent moves in implementation. As such, Toshkov (2012) argues that "transposition is a necessary but not a sufficient condition for compliance" (p. 98), implying that a third layer should be in place in order to ensure practical implementation.

How transposition happens in the case of the BP, and what are the factors affecting the transposition of such policies?

This chapter hypothesizes that transposition can be a result of several factors including: (T1) National representatives' meaningful participation in policy-making processes both at the BP level and at the national level, and the extent to which they disseminate the information about the BP discussed topics and feed back the information to the principal (top decision-makers), but also to other subunits or structures within the HE policy making process. Since at the administrative level governmental agencies and bodies (with competences in HE), and the academic community participate in a series of (organizational) socialization processes, this chapter hypothesizes that (T2) the support from the HE community and their interactions with the wider BP community across EHEA affects the choice for specific policy instruments and implementation mechanisms. Last but not least, considering the character and complexity of the policy to be transposed, the in-charge agency and its politico-administrative context, it can be hypothesized that (T3) the decision-making authority, discretion and capacity implementing organizations have with regards to the policy in question affects the transposition phase and the further implementation of the policy.

With it comes to the BP, at the administrative level governmental agencies and bodies, societal actors, and the academic community are responsible *representing the country in the Bologna Process structures* (e.g., WGs, etc.) and inform national level policy-makers about the main developments at the supranational level and contribute to national level policy-making. Likewise, the same actors are expected to participate together with HEIs representatives and students in the BP *socialization processes* (e.g., seminars, trainings) and exchange practices and working methods in line with the BP promoted policies, affecting the choice for specific policy instruments and implementation mechanisms. Just as importantly, ministers,

governmental agencies and bodies in the field of HE are the most legitimate actors to contribute to the *transposition of the Bologna Process action lines into action plans, strategies, measures or concrete policies*.

(T1) Domestic actors' participation in the Bologna Process policy-making processes and their contribution to national level policy-making

Most of the times, considering the low level political participation of the ministers in the BP decision-making structures (Bergan and Deca, 2018), different types of institutional representatives are delegated to *represent the country in the Bologna Process follow-up structures*. Vukasovic, Jungblut and Elken (2017) contend that the size and rank of national delegations is linked to a country's reported performance in the implementation of the BP action lines (e.g., the higher the representatives rank, the better the implementation performance).

The participation of students, professors and staff in the BP policy-making processes is a significant component in policy implementation. Heracleous (2008) claims that if those institutions or actors that are in charge of implementing a policy are not consulted in the development phase, it can periclitate their commitment in the actual implementation phase. In the same line, Bergan and Deca (2018) argue that the BFUG delegations do not convey sufficient political weight in their own ministries to able to speak on behalf of their authorities, and in addition, within each country there are internal dynamics, clashes and frictions when it comes to policy-making in HE. Delegation dynamics like the above might create a principal-agent problem in which the agent has more and better information than the principal (the decision-makers) about what is discussed within these structures. Therefore, one of the first factors with the potential to impact transposition is *national representatives meaningful participation in policy-making processes both at the BP level and at the national level, and the extent to which they disseminate the information about the BP discussed topics and feed back the information* to the principal (top decision-makers), but also to other subunits or structures within the HE policy making process.

(T2) Organizational socialization processes and the support from the higher education community

Secondly, at the administrative level governmental agencies and bodies, societal actors, and the academic community are responsible for participating together with HEIs representatives and students in the BP *socialization processes* (e.g., seminars, trainings). It is

expected therefore, that the support from this community of actors affects the choice for specific policy instruments and implementation mechanisms. Through the communiqués and declarations produced by the ministers, the BP participating countries are encouraged to develop additional working methods. The BP actors and stakeholders provide plenty of opportunities for the participating countries to learn from each other and exchange practices and ideas with the aim of encouraging implementation and shared practices (see for example, the Peer Learning for the Social Dimension (PL4SD) project). Such instruments (e.g., conferences, seminars, peer learning activities) create a space for dialogue between the different stakeholders and create a common understanding of what is expected from them and their national governments.

Hall and Taylor (1996) claim that common institutional practices emerge from an interactive process of socialization and exchange among the actors, which gives them the opportunity to share their problems, possible solutions, etc., processes which are taking place in a variety of forms and shapes, and based on what actors are developing, e.g., shared "cognitive maps, often embodying a sense of appropriate institutional practices, which are then widely deployed" (p. 17). In this context, Thoeing (2007) argues that organizations adopt formal structures, procedures and symbols that are similar to those of other organizations through either coercive, mimetic, or normative isomorphism. In most of the cases these adoption/ imitation processes are the outcomes employed through pressure by either legitimate organizations or through political influence (p. 91). According to Jupille and Caporaso (1999), "institutions structure incentives, instantiate norms, define roles, prescribe or proscribe behaviour or procedurally channel politics" in order to influence political outcomes that occur mainly because of that specific institution (p. 432), arguing therefore that preferences are endogenous, meaning that actors' goals cannot exist separately of institutions. It is assumed that actors' preferences are conditioned by those institutions which define what constitutes appropriate behavior.

Through the communiqués and declarations produced by the ministers, the BP participating countries are encouraged to promote specific measures in order to "facilitate the proper and full implementation of the agreed Bologna principles and action lines across the European Higher Education Area, especially at the national and institutional levels, among others by developing additional working methods, such as peer learning, study visits and other information sharing activities"; to learn from each other "We call upon all actors involved to facilitate an inspiring working and learning environment and to foster student-centered learning" (Budapest-Vienna Declaration, 2010), or to: "disseminate examples of best practices

and to design scenarios for mutual acceptance of evaluation and accreditation/certification mechanisms" (Prague Communiqué, 2001).

Processes of actors' socialization (Parson, 1951; Schimmelfennig, 2000) - through peer leaning exercises, different seminars, forums, funding – play a crucial role in norm internationalization and in shaping needs and policy preferences. In line with the sociological institutionalism, it is argued that *common practices at the national level are emerging from an interactive process of socialization and exchange among the actors, based on which they are developing appropriate policies and practices.* Such examples are a clear indication that socialization practices contribute to a great extent to "the development of a widening pool of common-sense understandings, roughly coherent lines of argument and self-evident statements about higher education in Europe" (Keeling 2006, p. 209).

(T3) Implementing organization's decision-making authority, discretion and capacity

Not least of all, at the administrative level governmental agencies and bodies, societal actors, and the academic community are the more legitimate actors to contribute to the *transposition of the BP action line/policy into action plans, strategies, measures or concrete policies and instruments for fostering implementation*. Here, several considerations are relevant. First of all, as mentioned before, HE policy making is a complex process which is not the sole competence of one authority or ministry. As far as the relationship between the implementation institutions and bodies is concerned, O'Toole and Montjoy (1984) contend that in the absence of a formal authority and its supervision, there is likely to be very little coordinated effort without the provision of resources, unless the new policy happens to match closely the goals and/or world view of the units in question. Since some organizations operate upon the same object, they share pooled interdependence, that is, they require something from one another to do their part of the job. Spillane et al. (2002) claim that if the responsibility for policymaking is not clearly demarcated or defined in the various branches and levels of government that exercise policy jurisdiction (often over the same issues), this can undermine the power of the policy in question. A common argument from an organizational perspective is that the *type of interdependence* (in terms of resources) and interactions between implementing agencies can significantly affect implementation.

Generally speaking, once the policy is adopted the *responsibility for its implementation is placed in an agency or organization* (sympathetic with the policy's goals), or sometimes new agencies are created to deal with the policy. Montjoy and O'Toole (1979) argue that it matters a lot whether the organization's leadership is dealing or not with a new mandate, and

how the leadership interprets the new policy or leaves it to lower levels within the organization. Additionally, these authors mention that the creation of a new agency to deal with the policy would reduce some of the factors obstructing implementation. Such bodies might respond positively (for example, by adapting existing routines) or negatively to this new mandate (resist or, depending on the level of discretion, integrate the policy into their existing mandates). A rather managerial factor is the extent to which decision-making authority and discretion is delegated to the implementing organizations and how this potentially undermines policy implementation (May and Winter, 2007, p. 456). The problem of administrative legitimacy is that every law or rule entails interpretation. These interpretive decisions of administrators, however, must have legitimacy, which in a democracy must derive in some way from the consent of the governed (deLeon and deLeon, 2002, p. 480), in this case the academic community.

Another relevant theoretical aspect refers to the existing administrative *capacity* within an institution, the skills and competencies possessed by public bureaucracies, and how they deal with problem solving, with the existing human and financial resources and the needed institutional change (Veiga and Amaral, 2009). It is often argued that policies that fit implementing agents' agendas are more likely to be implemented, and those that do not are more likely to be either opposed or modified so that they do fit (Spillane et al., 2002). Most of the times, institutions are more willing to respond to policies which bring resources for implementation, and their agenda or mandate is specific and familiar.

In addition to the above, Kaeding (2006) argues that together with the specific national implementing variables and institutional and actor configurations, *the character of the policy to be transposed* matters. As far as this aspect is concerned, it is stated that policy amendments to an earlier policy are technical in nature and would require less time for transposition since it implies an adaptation of an existing policy, whereas new policies introduce a new topic of legislation, which would require more time for transposition (Steunenberg and Rhinard, 2010). Similarly, Steunenberg and Toshkov (2009) claim that the legal fit is a significant factor in explaining transposition. The complexity of the policy (e.g., amount of text, technical appendices) is another feature affecting transposition: the more complex a directive, the more difficulty domestic actors have in transposing the text (Steunenberg and Rhinard, 2010). The inability of policymakers to formulate and design clear and stable directions with respect to the desired policy change can undermine local implementation (Mazmanian and Sabatier, 1981; Pressman and Wildavsky, 1974). The idea of policy "haziness" can be a function of consensus

in the policy making process, but it can also be a function of the "sensitivity" of the policy area one is concerned about.

The transposition of a policy also depends to a certain extent on the complexity of the policy and the degree of change it entails. It is assumed that the longer the policy legacy and the clearer and more systematic the action line and its goals are, the more likely its transposition into action plans, strategies or concrete policies is (Chayes and Chayes, 1995). The policy to be transposed should be legitimate and widely accepted and supported among the main stakeholders including the target group of those policies. In the case of HE policy, HEIs representatives (e.g., rectors' councils, student unions, academic networks) have the legitimacy to propose policy changes and to contribute to the way in which policies are transposed. Spillane et al., (2002) argue that a policy is more likely to be implemented if the policy actors have the ability to clearly formulate policy outcomes and to supervise their implementation. As such, it is claimed that when policy directives pair a clearer implementation goal with tractable procedures (e.g., policies that have a valid theory connecting behavioural change to outcome and an effective and efficient way to measure change in local behaviour), they are more likely to be implemented. While this allows for agreements on the policies, they make implementation difficult, since the more abstract and unsystematic the proposed policy and its goals are, the less likely its transposition into action plans, strategies or concrete policies is at the institutional level. As such, objectives should be clear, consistent, and well communicated and understood by the policy protagonists and targets.

To summarize, a second mechanism specific to the transposition stage implies that mutual learning and other socialization processes equip governmental agencies and bodies, societal actors and the academic community with information about the main developments at the EHEA level and contribute to national level policy-making by feeding back national policy makers, affecting therefore the choice for specific policy instruments and implementation mechanisms. The causal model predicts that if the BP policies have the support of top domestic actors and structures, this may push the national policies closer to the ones promoted by the BP. As a result, the BP structures prefer to collaborate with those domestic actors who are in favor of its policies.

4.1.3. Practical Implementation

This subsection focuses on practical implementation. It hypothesizes that practical implementation depends on institutional leadership, priorities and level of autonomy, the associated capacities and resources for implementation, and implementers' discretion and

familiarity with the goals of the policy. The corresponding mechanism states that at the HEIs level rectors and top-managers, academic and administrative staff, and students develop institutional plans and policies in line with national level policies or the BP depending on the added value of the policies in question.

An analytical framework for HE policy implementation must account for the institutional level because implementation depends basically on HEIs' activity. This chapter stresses the idea that both the top rank and the lowest rank institutions matter and that they have a final say not only in the implementation of reforms but also in bringing issues on the national and the BP agenda (e.g., HEIs' multiplicity of roles). While the adoption and transposition stages can be prerequisites for HEIs level implementation, practice has shown that HEIs can circumvent national processes and implement what fits with their institutional development plan.

The practical implementation stage represents the last link in implementation chain, HEIs being the end targets of such polices. It refers to the establishment of the necessary agencies, tools and instruments, monitoring and compliance mechanisms at the lowest institutional level (Versluis, 2007, p. 53). This last phase refers to the application of the transposed measures with the intention to produce some change on the ground, by adjusting the behavior of the target group. In other words, it is about the development of HE policies that act in line with the goals and objectives intended by the policy makers (Weaver, 2009). As mentioned in the transposition section, additional work is needed to move implementation further once polices have been transposed. Toshkov (2012) argues that "transposition is a necessary but not a sufficient condition for compliance" (p. 98), implying that a third layer should be in place in order to ensure the practical implementation of those policies.

Assessing the existing BP implementation literature, it can be observed that there is little research about the HEIs level and on comparing different HEIs and policy areas performances at this level. The scarcity of literature on the university level makes it necessary to draw on implementation literature and theories in order to construct a basis for further analysis. Analyzing institutional actors proves to be relevant for understanding how the practices developed meet or not the outlined policy objectives and the extent to which they produce unanticipated effects (Sin, Veiga and Amaral, 2016). The crucial role of HEIs is due to their ability to lobby national governments to implement policies and/or to create legislative frameworks (Murray, 1976; Vukasovic and Stensaker, 2018), and their ability (e.g., their level of autonomy HEIs have) to circumvent national legislative processes and comply with BP directly (Batory, 2016). Moreover, as Miclea (2003) puts it, the BP "not only represents a

political commitment on the part of the governments of the signatory countries, but, at the same time, it is an immense opportunity for the universities to play a crucial role in reshaping the European Higher Education Area" (p. 265).

At the HEIs level rectors and top-managers, academic and administrative staff, and students are expected to *develop institutional plans and policies* which are in line with the national level policy; to *contribute and participate as stakeholders* in the national and supranational HE policy-making processes; and to *ensure the practical implementation* of that policy. Based on these roles and responsibilities, the next sections will put forward the main factors affecting this level of implementation: (P1) institutional leaders' preferences for policies in line with the BP and national level policy frameworks are a result of HEIs' autonomy (and the extent to which they can opt out of implementation), their priorities and the associated capacities and resources for implementation. Secondly, (P2) provided that implementation and monitoring is placed in administrative-managerial units, it follows that implementers familiarity with the goals of the policy and its perceived added value, considerably influences implementation.

(P1) Institutional leadership, priorities and higher education institutions' autonomy

Most of the times, university rectors and their teams are expected to *develop institutional plans and policies.* Considering this role, it can be hypothesized that practical implementation depends on the *institutional leadership, its priorities* and the level of *autonomy* of HEIs (Odden, 1991). Considering that academics are centrally positioned in HEIs and academic communities and networks are centrally positioned in the national HE policy-making processes, they have a direct contribution in advising national policies and supranational HE initiatives. Furthermore, regardless of the transposition stage, HEIs can circumvent national processes and implement what fits with their institutional development plan. Implementation can be a result of HEIs' *capacities* and their discretionary power to implement only those policies which bring added value or sometimes additional (financial) resources or benefits (Cairney, 2011; Sabatier and Mazmanian, 1980).

(P2) The associated capacities and resources for implementation and implementers' discretion and familiarity with the goals of the policy

Depending on their competence and the political salience of the discussed topics it is expected that rectors and top institutional decision-makers, students' representatives, faculty, and staff will *participate in national and supranational policy-making processes and will*

contribute as stakeholders and directly affected parties. In this study it is worth assessing therefore the extent to which implementers participate or have a say in the selection and formulation stage (Crosby, 1996). Hjem and Hull (1982) argue that the relationship between institutions in the implementation process should be more realistic and viewed through the eyes of the population and the institutions which are based at the lowest level. They consider that the bottom-up approach fails in delivering a good implementation if the central authorities do not give the freedom to local implementers to adapt the strategy to the needs of the target population. In other words, it is claimed that the likelihood of implementation is higher when those who were primarily affected were *actively involved* in the planning and execution of those policies (deLeon and deLeon, 2002).

Just as importantly, (3) *ensuring the final practical implementation* is most of the times the responsibility of the administrative staff. In this regard, May and Winter (2009) assume that there is a relationship between front workers' willingness to implement a policy and the content of that policy and its intended outcomes. If they consider that the available policy instruments for implementing a policy will not be effective (delivering added value to their clients) they do not see how their targets will benefit from that policy and they will be more reluctant in implementing it. At the same time, the positive effect discretion has on the bureaucrats' perception of target meaningfulness can be seen as an important condition for implementing the policy. Their research shows that when street-level bureaucrats perceive that their work is meaningful to his/her clients, they are also more willing to implement a specific policy program, because they are more convinced of the goals and benefits of this program.

Hence, *discretion gives front line workers* the possibility to apply their own judgments when dealing with the needs and wishes of final targets of the policy. Winter (2009) argues that target groups' response can influence policy implementation, or even predict its success or failure. Assuming that the front-line workers interact (physically) with the policy target group, they would also possess valuable information which might have a positive impact when combined with their discretionary power. Veiga and Amaral (2012) tend to emphasize that even though traditionally the administrative and management staff originally tended to be in the periphery of HEIs, more recently, their position moved towards the center, and this has been due to the fact that they create and spread routines and procedures related to their professional activity: "with the rise of New Public Management, the administrative staff see themselves as essential professional contributors to the successful functioning of the contemporary university and consider that the present complexity of their job is no longer compatible with the amateur approach" (p. 130).

While the status and position of top university leaders and staff is quite clear, students' importance remains highly debated. On the one hand, Veiga and Amaral (2012) contend that students "as clients or consumers are placed in a peripheral, volatile, and ephemeral positions" (p. 130) regarding HE policy. On the other hand, Jongbloed et al., (2008) argue that students remain the most important stakeholder group at HEI and national level despite the fact that today's HEIs have to respond to a more diversified groups of stakeholders. As indicated by Haug (2003), integrating students in the institutional and national decision-making structures and safeguarding their interests and inputs becomes an undeniable necessity considering the growing global HE competition.

Finally, the existence of *monitoring and reporting mechanisms* (Zeitlin, 2007) in a multilevel setting such as the BP enforces the implementation of the agreed policy goals and eventually challenges non-implementation by naming and shaming, by providing appropriate incentives or sometimes by depleting HEIs from certain rights (e.g., funds, membership in networks), therefore reducing the non-implementation (Tallberg, 2002). The different implementation reports (e.g., trends, stocktaking, national etc.) within the BP provide first-hand information and data on the developments taking place at the national and institutional level on very specific policy areas/action lines. It is believed that such exercises could provide information on the advancement of the BP and the possible challenges and problems in implementation, and at the same time, would foster accountability, intervention improvement or basic knowledge advancement (Vedung, 2017).

To summarize with regards to the practical implementation stage, the corresponding mechanism implies that HEIs develop institutional plans and policies in line with the national level policies or the BP depending on their participation as stakeholders in the policy-making processes, and the added value of the policies in question for further institutional development.

4.2. Summarizing the Factors Affecting Implementation

Table 7 below, summarizes the main factors that can account for the different levels of implementation across countries within the BP. These will be tested in three country contexts and several universities (see section 3.2.).

Table 7. The potential explanatory factors affecting implementation

Implementation levels Responsible parties	Potential explanatory factors
Adoption **State (political) level**	National representatives' participation in the Bologna Process decision-making processes The incorporation of implementers and target groups in policy-making processes at the Bologna Process level The type of government and ministerial structures The provision of the policy to be implemented
Transposition **Administrative level**	Bologna Process national representatives' participation in national policy-making processes Socialization processes and exchange of information among actors and stakeholders The decision-making authority, discretion, and capacity of implementing organizations
Practical implementation **Institutional/ University level**	Institutional leadership, priorities and autonomy The associated capacities and resources for implementation and implementers' discretion and familiarity with the goals of the policy

(Source: developed by author)

To summarize, the proposed framework contributes to highlighting the complex relationship between the BP, national, and institutional policy-making and the importance of national and institutional (interest) structures, actors (coalitions) and processes in connecting these levels (Knill and Lehmkuhl, 2002). The focus on explaining the differentiated integration within the BP lies in examining the dynamics at national level. As such, this dissertation argues that the three different implementation stages - adoption, transposition and practical implementation - involve solely the country and the HEIs in question and their capacity and willingness to put in practice what is desired and agreed; nevertheless taking into account the environment in which such policies emerge and develop the framework also explores aspects such as the dynamics between participating countries and the BP structures, non-state actors and institutions involved in policy-making, etc. Through the joint agenda setting and decision making between the different national policy-makers and through its specific characteristics (its legitimacy to define common objectives that guide national policy, evaluation and benchmarking of national performances, etc.) the BP acts as a policy model (conveyed through the commonly commitments) which is used for the development of national and institutional policies. Nevertheless, some of these factors may not be sufficiently concrete for empirical testing and they may also overlap in practice. This "textbook" perspective approaches the policy process as a series of successive stages (with agenda setting, policy adoption, decision-making, policy design and policy implementation similar to the policy cycle).

5. Adoption at the National Level

This chapter is dedicated to answering the research question by focusing on adoption as one of three stages in the implementation of the BP (discussed in chapter 4). This dissertation aims to explain the differentiated integration of the BP and the policy changes and reforms undertaken by participating countries and HEIs. The sub-research question this chapter addresses is: *What are the factors explaining the adoption of the Bologna Process' QA and SD policies at the national level?*

The chapter begins with a short overview of the context in which the countries under consideration joined the BP by pointing out their motivations to join as an important factor to further reform. The chapter proceeds with a summary list of the major SD and QA reforms as an indicator of the adoption and transposition performance of the countries under consideration within the BP. One of the caveats here is that it is rather difficult to assess the measures taken within the framework of the BP because HE policies are embedded into a wider policy-making context. What the BP promotes is not in itself unique, and policy changes are not always the result of the BP, but of governments' policy initiatives and reforms, shaped by national contexts and debates (Musselin and Teixeira, 2014) and HEIs' autonomy. In order to test the proposed hypotheses, the chapter continues with an in-depth, comparative, empirical analysis of the above-mentioned factors affecting adoption.

5.1. Motivation for Joining the Bologna Process

The idea of assessing the motivation to join the BP has been driven by the potential of that motivation to drive further implementation. Depending on their motivation, participating countries adjust their behavior and actively engage in implementing the agreed commitments as a way to maximize expected outcomes (Hoareau, 2009). One of the reasons for cooperation in HE through the BP is the fact that in thus way participating countries could address common European problems that otherwise could not be dealt with at the national level (Racké, 2006). Moreover, the high political risk of not being aligned with European trends (Falkner et al., 2005) pressures participating countries to align their behavior with European and international standards. In order to enjoy the benefits of cooperation, national governments care more about complying with BP commitments and being compatible with other European HE systems. It is

assumed that the lower the compatibility between the BP and the domestic processes, policies and institutions, the higher the adaptation pressure.[44]

The BP represents a point of reference for many European countries with regard to certain values in HE, including university autonomy and academic freedom (Matei and Iwinska, 2018). Most important, however, is the cooperation process itself, since this cross-European calibration is perceived as a good thing and something to be valued across participating countries. Joining the BP means that domestic resistance to policy change is kept at a minimum and the legitimacy of the reforms is enhanced. Countries engage in processes like the BP due to several factors, including the successes or failures of previous such experiences, the value associated by peers/ other countries to the BP, the legitimacy it provides to adopters, its potential to solve a given problem, or its potential to maintain or improve one's attractiveness with respect to competitors (adapted from Maggeti and Gilardi, 2015). Besides, there is also the dissatisfaction with the status quo, international or supranational influence (coercion), and the fear of being left behind.

Generally speaking, there are two main types of motivations for joining the BP. One is normative and follows a logic of appropriateness, and the second is instrumental and follows a logic of consequences. Yet, they are not mutually exclusive. The logic of appropriateness refers to situations or actions in which actors follow internalized prescriptions of what is socially defined as normal, true, right or good, and what they consider to be appropriate. The logic of consequences involves a thorough calculation of consequences and expected utility. Actors anticipate action, recognize alternatives, have fixed preferences (values), and their behavior is determined by the returns (best consequences) of the selected action or choice (March and Olsen, 2004).

In Portugal, the motivation was mixed. On the one hand, there was a general perception that it was part of Europe and joining the BP was an opportunity to be part of an "extraordinary movement" (Pt_Nat#1). The Portuguese representative of the Rectors' Council (CRUP) stated that joining the BP was a political decision of the then-Education Minister to make Portugal be among the first to sign the BP declaration. This political act became formalized in 2006 when Portugal adopted a specific law on BP implementation (Pt_Nat#4). Others have seen it as an inevitable act: "being [a] small country in Europe and we had to follow the EU rules"

[44] Börzel and Risse (2003) are investigating how do European integration and Europeanization more generally affect domestic policies, politics, and polities of the member states. They argue that there must be some degree of incompatibility between European-level processes, policies and institutions and domestic-level processes, policies and institutions. This degree of fit or misfit constitutes adaptational pressures, which is a necessary but not sufficient condition for expecting change.

(Pt_Nat#3). This view was supported by a trend of internationalization since the 1970s, when a large number of academics went to study abroad (in England, USA, Germany, France, etc.). The return of these newly-formed academics, who are now rectors or policy makers at the national level, had a great impact and influence on the restructuring of the Portuguese higher education system (Pt_Nat#3).

The BP has played an important role for the post-communist countries of Central Eastern Europe (CEE), not just with respect to the democratization and modernization of their HE systems, but also because of their efforts towards European integration (Szolár 2011). For the specific case of CEE, Matei, Craciun and Torotcoi (2018) argue that in the early 1990s the region engaged in a structural reform process and looked for practices and models that could work in their country contexts. Instead of borrowing or experimenting with HE models from other regions, or developing their own home-grown models, CEE countries joined the emerging European model put forward by the BP. If for the EU member states the BP represented a means for deeper integration, for non-EU member states the BP was an instrument for achieving further Europeanization and an EU accession tool (*ibid*).

As revealed through the interviews, the motivations of Moldova and Romania for joining the BP follow very much the paths mentioned above. At the macro level, both Moldova and Romania, once they became democracies after the fall of the Berlin Wall, engaged in a structural reform process in which the BP played a (policy) instrumental role in modernizing their HE systems or specific sectors of them.

A rather normative or ideational justification for joining the BP in Moldova is exemplified by one of the interviewed staff members at the Ministry of Education, who states that:

> *it was necessary to join because we are all broken from a former Soviet system. We have awakened overnight [to the fact] that we are an independent country and that we must make new changes, to modernize and democratize the entire educational process. […]. We needed for the world to know us, to accept us* (Md_Nat#4).

Complementing this view, another respondent puts forward the idea that Moldova, after gaining its independence (from the Soviet Union), could decide by itself on certain things and the BP represented something the policy-makers wanted to embrace because "it was coming from Europe not from … Russia" (Md_Uni#6). Overall, the BP is considered one of many tools for fostering Europeanisation and moving away from the former communist system.

Somehow more critical, a former national-level student representative who is a higher education expert and a QA agency member states that:

> *Moldova has joined the Bologna Process because this is a trend; because small countries do what the big countries do what they see older people do. This is the only argument. This argument can be formulated in very sophisticated terms; That we, here in the Republic of Moldova, wanted to join, align [with], promote quality values in higher education, yes, we could say many sophisticated words, but the essence [is] we [did] it out of inertia, I think. Negotiating practically nothing by signing with [our] eyes closed* (Md_Uni#2).

This is very much in concordance with the idea that "policy choices are the result of imitating the policies of successful others, of learning from the experience of others, and of strategically adapting to the policy decisions of competitors" (Meseguer and Gilardi, 2009, p. 529). The idea of policy learning is also present through the "proximity prompts imitation" logic in which countries learn from each other's experiences and use the knowledge and information of a specific policy outcome to inform national level decisions. Stressing the instrumental motivation for joining the BP, one of the interviewed pro-rectors from Moldova (Md_Uni#3) claims that the country has been trying for many years to reach the threshold of the EU, while at the same time the BP provided an opportunity to benefit nationally from the larger European HE space (e.g., its available resources, including funds, policies and the general vision).

In Romania, most of the interviewees agree on the instrumental role the BP played in getting closer to the EU. One of the deans interviewed states that: "Romania wanted to be part of Europe before Europe existed. […]. After 1990 there was a trend of belonging to the European family, which has rather a symbolic value" (Ro_Uni#3). In Romania, it is worth noting that the BP represented a passport into European Union accession - the education chapter was the first one closed in the accession process (Ro_Nat#1). Similarly, Deca (2013) argues that Romanian actors in the field presented the BP and its policies as coming from the EU, inducing a different perception of the whole process. Romania wanted to keep pace with what was happening at the European level (Ro_Nat#8) and saw an opportunity to create uniformity at the European level - but at the same time, structural change was needed in Romania (Ro_Nat#20). As one of the HE experts mentions, the decision to join the BP was the result of the Education Ministry at that time, which wanted to change things for the good as much as possible, and at the same time move towards Europe (Ro_Uni#19).

To conclude, as presented above in this section stakeholders perceived as the core rationales, or motivation, for joining the BP the need for being recognized as equal partners in the European HE space, regardless of a clear understanding of what this implies and the implications that come along with membership, but with some expected benefits for the

national HE system. While the few interviews from Portugal show that BP was perceived as a HE process to be part of, both Romania and Moldova saw the BP as a window of opportunity for EU accession and integration, a way to get aligned with other Western European countries, and only to a certain extent, an occasion, to improve their HE systems (Matei, Craciun and Torotcoi, 2018).

5.2. Implementation Performance

As explained in the methodology section, this dissertation aims to test adoption-specific factors by looking more in-depth at the national-level situation in the countries under consideration with respect to two policy areas, the social dimension and quality assurance. This section starts by discussing the national adoption and transposition performance of the countries under consideration in the two policy areas, from when they joined the BP until 2018. As stated in the analytical framework chapter, adoption and transposition are materialized when the necessary legislation providing a legal framework for addressing the policy issue at hand is in place, complemented by governmental decrees, ministerial orders, or lower-level legal administrative instruments. While this research treats adoption and transposition separately (see the next chapter on transposition), it acknowledges that there is a certain extent of overlap between the two, both in terms of process and of content. Sometimes transposition occurs prior to adoption, meaning that a thorough analysis and calculations have been made before something is being debated and adopted legally. In other cases, legislative amendments take place over time in order to update an existing regulation.

Based on the existing BP implementation reports and further desk research, Tables 8, 9 and 10 below present a synopsis of the adoption and transposition performance (as the main policy outputs) of the countries under consideration with regards to the SD and QA national-level laws and policies.

Table 8. Moldova's implementation performance since 2005

QA (agency and ESG)	**SD (strategy, student diversity, and services)**
- 2005/863 Governmental decision approving the 2005-2008 Program for the Modernization of Education: the creation of a quality management system at HEIs level; and evaluation experts - 2006 – Government Decision regarding the Evaluation and Examination Agency - 2008 - Government Decision regarding periodic evaluation and accreditation - 2014/652 – Government Decision regarding the National Agency for Quality Assurance in Professional Education (ANACIP) - 2014 – Education Code, articles 112-115, on quality assurance - 2015/191 – Government Decision regarding ESGs and ANACIP - 2016/616 – Government Decision on ESGs - 2018/201 –Government Decision regarding the establishment of the National Agency for Quality Assurance in Education and Research (ANACEC)	- 2005/863 Governmental decision approving the 2005-2008 Program for the Modernization of Education: the diversification of financing sources and the criteria for scholarships; and meritocratic access - 2006/1009 – Government Decision regarding social scholarships - 2007/74 – Government Decision regarding free student accommodation (e.g., orphans, disabled, teachers) - 2010/ 630 – Ministerial Order on access to the bachelor level (quota system for 9 groups of students) - 2014 – Education Code, art. 7, 9, 80 on social inclusion in higher education, free access per level of study

Moldova has created adequate strategies and plans to adjust its HE system according to the BP commitments. With regards to QA, Moldavian legislation was a first step toward alignment with the BP. After one year of membership, Moldova created an agency to deal with QA aspects. The ESGs (of 2005) were endorsed in 2015 with the adoption of the regulation on the organization and functioning of the QA agency, and formally adopted in 2016. As of 2015, Moldova has not been reviewed successfully against the ESGs, either for ENQA membership or registration on the European Quality Assurance Register (EQAR). As far as the SD is concerned, underrepresented groups are identified in Moldova and targeted measures are taken to counteract underrepresentation. Due to the socio-political conditions, the government decided to have a quota system for nine different underrepresented groups. In 2015 Moldova had quantitative objectives with reference to underrepresented groups, and the objective of widening participation is reflected in steering documents through a set of concrete measures at the national level. One of the limitations in exploring the Moldavian case is that most of information is not public (even though it should be), therefore the picture might be incomplete.

Table 9. Portugal's implementation performance since 1998

QA (agency, ESGs)	SD (strategy, student diversity, and services)
- 2003/Law 62 on the development and quality of higher education - 2006/ Law 74 on the requirements for the accreditation of study cycles - 2007/Law 38 providing a legal framework for quality assurance of tertiary education and ESGs alignment - 2007/Decree-Law 369 on the reform of the QA system, the establishment of the National Agency for Accreditation and Evaluation of Higher Education (A3ES) - 2007/ Law 62 setting the Juridical Regime of Higher Education Institutions (art 26, 61, 92) - 2008/Decree-Law 107 on the functioning of the accreditation agency	- 2003/Law on a higher education social action system, ensuring the right to equal opportunities in the access to, attendance at and success in education by overcoming economic, social and cultural inequalities - 2006/Decree-Law 64 establishes special conditions of access and entry in higher education, in particular for students aged over 23 years old not holding the standard requirements to access higher education - 2007/MO 401, Decree-Law 90 introduce certain changes in the general access and enrolment system in higher education; regulations for program change, transfer and re-entry into tertiary education - 2008/Decree-Law 107 on new mechanisms for monitoring the BP, simplification of procedures and flexibility in the access to HE and the part-time student regulations, social scholarship system - 2008/Decree-law 3 and Ordinance no. 201/2015 on student services - 2009/Ordinance17706 supplementary Erasmus grants for scholarship holders of school social action - 2014/Decree-Law 63 regulates the higher education special admissions system

As mentioned, the BP ESGs were launched in 2005. In Portugal changes have taken slower pace than expected with regard to QA policies, yet from a procedural point of view the country is aligned with the BP requirements. Higher education in Portugal is not free. Tuition fees have been an issue of discontent across different governments. Despite this, the social dimension is a rather well-developed policy issue, with flexible entry paths into HE, a diversity of financial aid measures and student services. In Portugal, the admission system and the distribution of social grants is centralized. Student services, however, which are rather well developed, are decentralized. Career and orientation services and offices for students with special needs (including small networks and cooperation between universities) are widespread.

Table 10. Romania's implementation performance since 1998

QA (agency, ESGs)	SD (strategy, student diversity, and services)
- 2005/75 Emergency Government Ordinance on QA agency (ARACIS) - 2005/1257 Government Decision regarding the approval of the Regulation for organizing and functioning of ARACIS and ESGs - 2005/3928 Ministerial Order on the implementation of the internal QA mechanisms in universities - 2006/87 QA Law approving the Emergency Government Ordinance no. 75/2005 - 2011 - Education Law: financing, student evaluation and assessment, the role of the state, HEIs evaluation & diversification - 2015-2020 National Strategy for Romanian Tertiary Education - 2016- 2020 Anti-corruption Strategy in Education - 2017/195 Governmental Decision on ESGs	- 1998 MofE adopted the first official regulations to reserve special places for Roma candidates - 1996 Order no. 558/1998 on general criteria regarding the distribution of scholarship and other financial support - 2001/1020 Governmental Decision on scholarships for students coming from rural areas - 2004/269 Law on financial support for the acquisition of personal computers; Gov. Decision on non-cash student support - 2005/ 3235 Ministerial order on counselling and career orientation centers - 2006/ 448 Law on the protection and promotion of persons with disabilities (50% discounts for housing and food, learning materials) - 2011 National Education Law 1/2011, university education is free for the enrolment number approved annually by the Government or is paid by the students, according to terms set by the law; subsidized student dorm places; scholarships or study loans; reduced fees for local public transportation; flexibility of learning paths, counselling and orientation services, alternative access routes or recognition of prior learning; scholarships: merit based with different subcategories (study, merit and performance scholarships) and social needs based with different subcategories (social or medical scholarships). - 2012 Code of Student Rights and Responsibilities, Education law – direct financial support, flexible learning paths, alternative access routes - 2014/650 Ministerial Order framework methodology for the organization and functioning of counselling and career guidance centers - 2017/3392 Ministerial Order On general criteria for granting the scholarships and other forms of material support

Of the three countries under consideration, Romania and Portugal are the only countries that have their QA agencies registered with EQAR. Romania adjusted rapidly to the ESGs. In 2005, the QA agency decided to copy-paste the ESGs and make them part of national regulations without proper consultation and debate at the national level. In Romania, the SD aspect of HE is also rather well developed: most students are financed by the state, there are different types of scholarships (both merit and social based), state-subsidized accommodation, free train transportation, etc. Student service offices deal with rather technical issues and infrastructure-related problems (e.g., quality and management of student housing, management of student canteens). In Romania, like in Moldova, only few students pay fees (predominantly

students with inferior academic records). Similarly, the objective of widening participation is reflected in national documents and a set of concrete measures at the national level.

To conclude, the data collected during field work shows that the countries under consideration present different levels of BP integration with regard to time, space and matter (temporal, territorial and sectoral - Holzinger and Schimmelfennig, 2012), meaning that the adoption of QA and SD policies does not occur simultaneously in the three countries. It can be also noticed that both policy areas have been integrated at different speeds and reached different levels of centralization over time (vertical differentiation - Schimmelfennig, Leuffen and Ritberger (2015, p. 765). If we look at the BP-level developments with regard to the SD and QA policies and compare it with national-level developments, no direct causal link can be made between the two, especially for the SD. If in the case of QA national-level changes might be associated with BP developments, in the case of the SD it can be noticed that domestic concerns prevail, and SD policies are adapted to the domestic conditions and needs. Finally, the evolution of SD policies at the national level does not take place as fast as in the case of QA.

As stated in the analytical framework, this dissertation hypothesizes that adoption of reforms and administrative acts can be a result of several factors. This hypothesis will be tested in the current chapter, including: (1) participating countries' (or national representatives') meaningful participation in BP decision-making processes between the ministerial conferences (e.g., participation in BFUG), and in particular their bargaining power in putting on the BP agenda issues they consider relevant for their national HE context; (2) incorporation of implementers and target groups into policy-making processes at the BP level and their support at the domestic level affects the adoption of the BP-promoted policies, since they can contribute by pressuring top decision-makers to back up their commitments.

Taking into consideration that the main bodies responsible at the national level for HE policy adoption are national governments, the type of government and its ideological preferences are crucial in adopting HE policies in line with the ones agreed at the BP level; therefore, (3) the more aligned governments' preferences are with the BP commitments, the higher the speed with which the BP policies are adopted. Last but not least, (4) the policy to be adopted matters from various perspectives, including whether it fits existing policies, institutions or practices, whether it is needed to solve an existing problem, and whether it is clear what it aims to achieve. It follows that the degree of complexity, fit and clarity of BP policies considerably influences the adoption stage.

The sections below aim to empirically test in comparative perspective (between countries and policy areas) the above-mentioned factors affecting adoption.

5.3. Participation in Bologna Process Decision-Making Processes

It is assumed that the countries involved in BP governance - hosting the Secretariat, (co)chairing the BFUG, etc. - play an important role in BP development since they can influence and shape the recommendations adopted by the BP ministers. The bargaining power of a country can be manifested through the extent to which it supports its (domestic) preferences and pursues further strategic self-interests ('uploading') through the different bargaining and deliberation mechanisms at the BP level. Based on the interviews, several themes have been identified with regard to national representatives' participation in BP policy-making processes (not in relation to QA and SD policies specifically, but from a general BP perspective). These themes have as their main focus different types of actors and their different forms of participation and engagement in policy-making processes at the supranational and national level. This section focuses on the countries' engagement with the overall process, their participation in the BP governance structures, and the opportunities these have created for uploading their policy preferences onto the BP agenda (shaping the content of the communiqués and declarations). It looks at key decision-makers and country representatives in the BFUG and its working groups (WGs, AGs).

While participating countries' involvement in the governance of the BP provides insights into the macro-level dynamics among participating countries and their power in promoting specific preferences, is important to explore the relationship between the different BP structures (e.g., WGs) and their input in defining the BP declarations and communiqués.

The BP declarations and communiqués are presented as texts of quasi-legal value although they are nothing more than declarations of the intentions of the signatory states (Ravinet, 2008). The incorporation not just of top decision-makers representing the country, but also implementers and target groups in agenda-setting and decision-making processes represents an opportunity for them to represent their interests and make their voice heard. The argument here is that the BP and its promoted policies reach the decision-makers' agenda in different ways, including through the final targets of such policies, but also through different interest groups, policy experts and policy entrepreneurs.

As mentioned in Chapter 1 (section 1.3), the BFUG is entrusted with overseeing the BP between the ministerial meetings and is responsible for the development of the overall process. It can establish WGs and AGs that might deal with certain topics in detail. Through the working plans, from one ministerial meeting to another, several priorities are recorded and a series of WGs for each of them is formed. Each WG writes a report about the work they have done and

puts forward a set of recommendations for the ministerial communiqué. One year before the ministerial meeting, a drafting committee is appointed, usually composed of the organizing country and the BFUG members (Ro_Nat#2).

As the key coordinating and decision-making structure preparing the next ministerial conference, the BFUG deliberates on the drafts of the declarations and communiqués to be discussed and adopted at the ministerial conferences. Besides the WGs, the BFUG receives a great deal of input on shaping its policy decisions: it benefits not just from a set of statements from its consultative members and position papers from a range of stakeholders in the European HE sector (e.g., diverse European-level organizations), but also from research (through the Bologna Researchers' Conference series) and evidence (implementation reports) on further needs and priorities.

A long-term member of different BP WGs claimed that the ministers have some time available before the Ministerial Conference to provide their input. When the ministers attend the ministerial conference, the communiqué is already drafted and there are few changes made during the conference, most of them about nuance and details: "it is important to mention here that the likelihood of the communiqué to be adopted depends on how well it was written. If it is badly written, then there will be a lot of changes, which is normal. The people who represent the BFUG are delegated by their ministers. They should constantly brief their minister so that he/she understands what the priorities are. The ministers, therefore, indirectly influence the BP through the representatives they send in there" (Ro_Nat#2). This quote summarizes the behind-the-scenes processes when it comes to policy-making within the BP, emphasizing, on the one hand, the disproportionate level of information country delegates have in comparison with the ministers signing the communiqué/declaration, and on the other hand the importance of follow-up structures in providing policy recommendations.

One of the hypotheses in this dissertation states that participating countries' and/or national representatives' meaningful participation in policy-making processes between the ministerial conferences, and their bargaining power in putting on the BP agenda issues they consider relevant for their national HE context, influences the adoption of BP policies at the national level. This will be tested below.

5.3.1. Moldova

As a non-EU country, Moldova was the chair of the BFUG (between 1 January - 30 June 2016) during the French Secretariat. As revealed through the fieldwork, the co-chairmanship with the Netherlands did not produce significant policy upload from Moldova's

side, but promoted individual learning and development for the country representatives. One of them claimed that this had been a valuable experience, since one has to know and understand the previous activity of the BFUG and its importance for future decisions within the BP (Md_Nat#4).

A former student representative from Moldova indicated that despite the position Moldova held as chair of BFUG, students were not involved or represented in this governance process. Student unions were not even informed about this. When they found out they started to put forward specific demands towards the Education Ministry (Md_Uni#1). Similarly, the student representative for the 2018 Ministerial Meeting (which I personally attended as a researcher) played a rather tokenistic role, since she had little to do with student representation at the university or national level and had little knowledge about the BP.

5.3.2. Portugal

Portugal has had a somewhat limited role in the formal governance of the BP. It presided over the BFUG in the second semester of 2007, when it held the EU Presidency. In Portugal there is a certain level of consistency with regard to BFUG delegates. Two interviewees stated that their mandate was between three and four years long. A delegate to one of the ministerial meetings and a former rector's representative stated that he had been attending the ministerial meeting for seven years in a row (Pt_Nat#1). This consistency of national-level delegation can have dual effects. On the one hand, the longer delegates work together, the more they become socialized with the BP norms and values and agree much faster on a course of action. On the other hand, at the national level, delegates can provide more informed recommendations based on their longitudinal perceptions and experiences.

A BFUG national delegate pointed out that even though the BFUG is officially a technical body, it is also a political one, because delegates define BP internal policy as agreed with their national governments, "based on their party priorities or the intention that they have" (Pt_Nat#4). The BFUG's task is therefore to aggregate a multitude of preferences and make recommendations to the BP ministers. When asked about how the discussion in the BFUG was evolving, the delegate pointed out that

> *Obviously, it was the countries that had a leadership role in that period or semester. It was the Ministry of Higher Education of the country that had the presidency of the Bologna [Process]. Of course, there were some countries [that were] more powerful, more intervening, more vocal than others. Especially Germany, France, Ireland, Denmark, those Central Western European ones* (Pt_Nat#4).

Related to the Portuguese experience, one of the interviewed ministerial representatives in the WG on the Social Dimension (2005-2007), not affiliated with any of the countries in this study, claimed that "some participating countries in the Working Group wanted to stop us from being too radical with regard to the social dimension changes; Sweden and Luxembourg rather took the lead and did background work which was later presented to the WG members, took the lead to promote certain aspects" (Europe#2).

As far as the Portuguese input in the ministerial meetings is concerned, it can be noticed that with regards to the SD, the country representative advocated for closer links between the BP and the European Union agenda of fostering access to and participation in HE. During one of the ministerial meetings, the government's representative stated the following:

> *On average, Europe facilitates the participation of four out of 10 European citizens to participate in higher education in average, so we are excluding from higher education six out of 10 children of around 20 years old. My challenge is to push this position in the current discussion in Europe for the financial perspectives for the next decade, to better frame the European Structural Funds to open social support to European citizens at large and to open access to higher education for all* (Pt_Nat#6).

This window of opportunity was also identified by a former Romanian delegate to the BP structures. Rather than seeing the EU funds as an instrument to achieve certain goals of the BP's SD agenda, the Romanian representative referred to EU recommendations to set national targets for HE participation: "Because they [the EU] saw that the student numbers are decreasing, they push this idea of diversifying the students and setting national targets; this comes with the Structural Funds, which are mainly used for access and participation" (Ro_Nat#3).

While this dissertation does not look into the absorption of EU funds for HE in the countries under consideration, it does reflect on the role of the European Union institutions and agencies in "interfering" with the BP and the extent to which the use of EU instruments enhances the implementation of certain policy areas. While Portugal and Romania are EU members and can make use of EU funds for the SD, for example, for Moldova and other non-EU countries this is not an option, since they are not directly exposed to the EU's policies.

5.3.3. Romania

Romania is the only country among the three under consideration that has hosted the BP Secretariat (2010-2012). When asked what it meant for Romania to held the BP Secretariat, a BP expert involved in the development of the Romanian Secretariat claimed that it was a moment in which Romania had the possibility to become a major player with regard to HE

policies in Europe (Ro_Nat#1). Romania set new standards with regard to organizing and hosting the Secretariat. It took responsibility for preparing and drafting public policy documents in the BFUG (around 13 WGs), it built the BP archive to compile all the information from previous Secretariats, and it also created some internal governance documents with regard to decision-making procedures and WG activities (Ro_Nat#1).

Reflecting on policy uploading, one of the interviewed BFUG members stated that "through the BFUG all the countries have the chance to take the discussion [in a direction] according to their preference or interest while hosting the Secretariat" (Ro_Nat#2). Another national level expert recalled that in Romania there was a lot of talk about the 2011 Act on Education and, through hosting the Secretariat, very relevant topics for the country were brought onto the BP agenda, such as diversification and the financing of HE, issues that, with the help of other countries, were introduced in the Bucharest Declaration (Ro_Nat#1).

One of the interviewees who has quite a rich experience with the BP both at the national and European level mentioned that at the national level, UEFISCDI played an important role in promoting a certain type of discourse with regard to the BP. UEFISCDI started its activity more intensely in , when Romania started to host the Bologna Secretariat. It brought a team of young, capable people and experts there and ever since has begun to develop projects and research in this area, bringing "know-how" into the country. UEFISCDI is the structure that has organized the Bologna Researchers' Conference three years in a row and has built a positive image not just of the agency itself, but also of Romania as an organizing country (Ro_Nat#2).

To conclude, and reflecting on the first hypothesis, which stated that participating countries' meaningful participation in policy-making processes (between the Ministerial Conferences) and their bargaining power in putting onto the BP agenda issues they consider relevant for their national HE context contributes to the likelihood of BP policies' adoption at the national level, the following can be claimed. On the one hand, interviewees supported the fact that the three countries under consideration had little or no direct policy input onto the BP agenda, nor did they heavily bargain for certain policies. On the other hand, the three countries had little or no direct policy input onto the agenda by being involved in the follow-up structures and governance of the BP. Moldova adopted a wait-and-see strategy and has underestimated its role in becoming an equal partner in the BP. Portugal, despite the fact that it has clear preferences when it comes to BP policies, reflects the unequal relationships among countries in the European HE policy-making arena in the sense it its voice is not always heeded. Similarly, Romania has made a great effort to have its policy upload onto the ministerial

agenda, but it plays rather a peripheral role in BP policy making. Such developments leave room for the policy and political direction to be set by those who spoke the most and dominated the discussions in the follow-up structures, those who also tend to have more expertise and to be better prepared around the ministerial meetings (Lažetić, 2010). This might have considerable implications for the lack of implementation at the national level since what is agreed upon does not reflect national priorities and capacities.

5.4. The Incorporation of Implementers and Target Groups

This section aims to test whether the incorporation of implementers and target groups (HEIs and students) into the decision-making processes at the BP level and their support affects the adoption of the BP-promoted QA and SD policies. The section starts by positioning some of the key supranational and transnational HE actors within the BP and the main mechanisms at work with regard to their members at the national level, as well as how this affects the adoption of QA and SD policies in Moldova, Portugal and Romania. The main argument here is that through their institutionalized position within the BP, supranational and transnational structures and networks and their national members act as brokers or intermediaries between domestic policy makers, HEIs, and the BP political field.

Participation in policy making in the European HE space should ensure the opportunity for expressing and integrating different stakeholders' opinions and standpoints with regard to the matter in question. Decisions are supposed to be taken based on consultations on the proposed policy developments with legitimate actors (see the BP structures and their main responsibilities in Chapter 1).

The BP remains politically salient for European stakeholder (transnational) organizations like the EUA, EURASHE, ESU, EI, ENQA or BusinessEurope, which have a political interest in influencing HE policy. Due to the complexity of HE governance and the difficulty of incorporating a diversity of voices, it is believed that the most representative, knowledgeable, and legitimate actors should be involved in relevant policy making processes and BP consultations and working structures. Within the European HE sphere, the EUA and ESU - representing higher education institutions, students and national student unions and organizations - are among the most appropriate stakeholders to be involved. Policy networks can be defined as clusters of actors that have an interest, or 'stake' in a given policy sector and that have the capacity to help determine policy success or failure (Peterson, 2003). The ESU and the EUA strengthened their position within the BP acting as interest groups defending their members.

Generally speaking, actors such as the above have been participating in the European HE policy scene as part of the epistemic communities. These are defined as "professionals with recognized expertise and competence in a particular domain and an authoritative claim to policy relevant knowledge within that domain or issue area" (Haas, 1992). They contribute therefore to "articulating the cause-and-effect relationship of complex problems, helping states identify their interests, framing the issues for collective debates, proposing specific policies and identifying salient points for negotiation" (Haas, 1992, p. 2). Through their institutionalized position within the BP, such structures can be considered as brokers or intermediaries between domestic policy-makers, HEIs and the BP political field, and most of the time they are ministerial or EC partners in the field of HE policy.

One of the hidden actors (Kingdon, 2003) within the BP is the European Commission (EC) who, through different tools (mainly funding and expertise), has succeeded to become an important partner in the BP.

> *Theoretically, the European Commission does not have competencies in education; however, it has money and, through its financing policy, it automatically influences what is happening within the Bologna [Process]. The fact that the EC financed the Secretariat and the Ministerial Conferences offered the EC an informal power within the Bologna [Process]. The EC finances ERASMUS projects and others as such which are interconnected with the Bologna policies. Of course, the EC has quite influential informal power. Moreover, through its study capacity through EURYDICE, the EC is coordinating the report regarding the implementation of the Bologna Process. Besides its essential administrative role, it also has an important role in the policy-making area, the EC's opinions [are] being considered seriously* (Ro_Nat#2).

The EC is supporting transnational EHEA stakeholders (i.e., ESU, EUA), mainly through funding, in order to enhance their capacity (including their national members) with regard to key BP policy areas, especially the social dimension and quality assurance. This is done through supporting research, data collection mechanisms, trainings and peer learning activities targeting the directly involved stakeholders. Provided with the expertise they receive through such instruments, EHEA formal stakeholders (e.g., BFUGs, WGs) understand the need to act as a whole with regard to such policies.

5.4.1. Policy Change for Quality Assurance Policies

When it comes to QA policies, the EC has ambitious goals (e.g., high quality and relevant HE for skills and competences) but moderate governance capacities. In order to foster compliance with is governance goals, it engages transnational and domestic HE policy actors (such as national governments, agencies, student unions, experts) who have local information,

technical expertise, enforcement capabilities, material resources, legitimacy, and direct access to targets (e.g., higher education institutions and students) in activities that shape preferences, beliefs and behavior. EUA and ENQA, both supported financially by the EC, have been instrumental in this respect.

Through transnational networks such as EUA or ENQA, HEIs have been enthusiastic promoters of QA policies, with most of the policy change at the national level initiated by the national epistemic communities. Moreover, EUA shows strong preferences towards certain policy areas (such as quality assurance, university autonomy, research and training) that reflect the EC's clearly-stated preferences. Being financially supported by the EC and possessing the relevant information, knowledge, and expertise in the field, EUA has become one of the most influential actors within the BP. Moreover, according to their website, based on its studies and reports the EUA issues declarations and statements before the ministerial conferences and provides guidance on specific action lines, especially quality assurance. As Smidt (2015) puts it, the QA agenda has been driven by the collaboration and continuous engagement of the four European stakeholder organizations: ENQA, EUA, EURASHE, and ESU, which developed a common platform for quality assurance; the ESG created and managed EQAR and organized the EQAF (p. 628).

An Education Ministry representative stated that Moldova adjusted "quickly-ish" (*repejor* in Romanian) to the ESGs' 2015 provisions (Md_Nat#4). Rather than proposing administrative acts that would legally endorse their implementation, the ministry decided to upload the ESGs to the ministry website and further transmit them directly to the universities. Only afterward did the QA agency develop a national methodology in this sense. When compared to the ESGs 2015 situation, the ministry representative claimed that at the time there had been no QA agency to take care of these matters, but HEIs were recommended to take them into account when designing their internal QA systems (Md_Nat#4).

With regard to the ESGs in Moldova, it was stated that in 2016 the QA agency - at that time, ANCIP - took "exactly the 10 standards" (ESGs 2015) as promoted by the ENQA, EUA, ESU, and EURASHE. In 2016, when the ESGs became formally adopted, the Governmental Decision states that the QA developments are in concordance with the ESGs proposed by ENQA, legitimizing the national level choices. As of 2018, in Moldova, the QA agency is still not an independent body as BP structures recommend but is subordinated to the ministry. The Moldovan QA agency is also not an EQAR member, meaning that it cannot conduct external review of HEIS and study programs. Nevertheless, it is an affiliate of ENQA, meaning that it has a "demonstrable interest" in QA, but is not required to demonstrate compliance with the

ESGs. Membership in these bodies shows that there is some sort of formal compliance with the BP policies, but there has been little change in practices and actions at the agency level.

In Portugal, the Council of Rectors of Portuguese Universities (CRUP) played an important role in setting up the agency. According to Rosa and Sarrico (2012), prior to the ESGs' adoption at the BP level, CRUP launched a debate on quality evaluation for the Portuguese HE system, which was based on the Dutch system. When the government decide to propose a QA law in line with the BP, there was already an example to follow and build upon (Pt_Nat#3). Over the course of 10 years the Portuguese QA system proved to be a failure, "no single program was closed because of the quality process" (Pt_Nat#3). In the circumstances of adopting a national law facilitating the implementation of the BP, the minister in charge asked ENQA to make an evaluation of the Portuguese quality control system. In 2005, ENQA evaluated the existent QA structure and provided further recommendations for its improvement. Overall, the evaluation was rather negative and the system in place did not produce any effects. The state of affairs was further diagnosed by the EUA institutional evaluation of Portuguese universities, all of which contributed to the dismantlement of the QA system. Considering these negative reports, in 2016 the ministry decided to implement a completely new organization; "It was obvious [it happened] because of the EUA standards and guidelines, the obedience [of the organization] could not go on, the new agency must be completely independent both from government and institutions" (Pt_Nat#3). The BP developments with regard to QA backed the Portuguese Government to act and adjust its QA system by creating a new QA agency and by formalizing the ESGs at the national level.

In Romania, a HE expert at the national level affirmed that the QA agency has been set up under pressure from the BP: "the agency worked to become an ENQA member and get listed on EQAR, events that shaped the QA policies in Romania in a way to conform with the European standards" (Ro_Nat#2). The Romanian QA agency is an independent, self-financing body listed on EQAR and an ENQA member. This contributes, to a certain extent, to a declining responsibility from the Ministry of Education towards the QA agency (Ro_Nat#7). At the time of the interview, November 2017, the QA representative stated that the agency was preparing for its international external evaluation procedure (usually in a five-year cycle) in order to prove its compliance with the 2015 ESGs. A former QA agency staff member claims that the law is quite explicit with regard to the outcome of this evaluation: "once ARACIS will not be listed in EQAR, it will have to be dismantled" (Ro_Nat#5). In the light of such developments, the agency proposed a new methodology (in the form of a governmental decision) which addresses the policy aspects that need further attention, including the new

ESGs, student engagement in the QA permanent commissions, etc. In short, the soft "carrot and stick" approach promoted by EUA and ENQA pushed Romanian decision-makers to adjust their policies.

The mechanism identified in the work of ENQA and EUA with regard to quality assurance is manifested through the work of their HEIs members and QA agencies at the national level. In all three countries, QA agencies are responsible for and expected to propose legislation and methodologies for the implementation of the ESGs in order to comply with the EUA/ENQA's standards and maintain their functionality. These findings and mechanisms are also present in other country contexts. A QA agency representative from Austria pointed out that the ESGs' 2005 implementation was highly conditioned upon the reviews of ENQA "in two years' time we will have the next evaluation, so we have to comply [with ESGs 2015] and when we rewrite our standards we will take them into account. The standards have changed in 2015, that is why we have new criteria now" (Europe#4).

5.4.2. Policy Change for Social Dimension Policies

A similar mechanism has been identified when it comes to the SD policies, but with ESU as the main actor. In order to ensure the sustainable supply of a highly-qualified labour force for the overall European economy, and therefore enhance economic growth, the EC has advocated for increasing and widening access to HE (Yagci, 2014; Keeling, 2006). Yagci (2014) argues that the ESU has been among the first actors within the BP to define access inequalities and the insufficient studying and living conditions of students, and later became a policy entrepreneur advocating for having the SD as a BP action line within the Prague Communiqué (Klemenčič, 2012).

A former student representative in ESU stated that it was among the first actors in the BP to have a comprehensive understanding and information about policy developments:

> *ESU insisted on being part of all the working groups. ESU could push their priorities, while other organizations and structures had no capacity to do so. In the beginning ESU had the so-called Bologna Committee – a structure to increase the lobbying activity of ESU and allow students to be on the same equal footing with the other stakeholders. Our student members (around 16-18 people) were part of different WGs and there was a need to bring all these people together and restructure our approach. What we did is to create different committees, such as the Social Affairs Committee,- which was in charge of the equity social dimension, we had an Academic Committee in charge of the quality of education, student centre learning and mobility, plus we had different thematic committees that could work on different action lines* (Ro_Nat#1).

In their article on transnational student associations in the European multi-level governance of HE policies Manja Klemenčič and Fernando Miguel Galán Palomares (2017),

both former ESU presidents, reflect upon the role of student organization in European HE policy processes. They argue that governments or university leaders are "forced", given the dispersed nature of political resources, to include the participation of stakeholders in decision-making processes in the interest of effective policy formulation, of legitimizing adopted policy, and of accountability (Klemenčič and Galán Palomares, 2017). Accordingly, these stakeholder associations "aid the efficiency of policy-making processes and policy implementation since these associations possess specialized knowledge, information and implementation agency" (p. 7). From the students' perspective, participation is rather an issue of voice, democracy and accountability, whereas for governments and university leaders, agreeing to student involvement may be out of a motivation to co-opt students or control them.

ESU plays a double role in the European-level HE policy making processes: "ESU is also the only transnational student association that is regularly invited to the meetings of the EU Directors General for Higher Education organized every six months under the rotating presidency of the Council" (*Idem*, p. 9) and "within EHEA, in neo-corporatist fashion, ESU, as a representative platform of national student unions, holds a representational monopoly" (abstract). As far as the first role is concerned, important developments in the relations between the EC and ESU have been made through funding arrangements: "Overall, we [ESU] had a good relationship with the European Commission. It has never stopped financing ESU. ESU competing for EC funding for its projects was a fair process," claims a former student representative at the European level (Ro_Nat#1). As far as the second role is concerned, the ESU gained this "monopolistic" representation role because of its structure and the Europe-wide representation it incorporates. It functions rather through double representation: most of its members are national student unions or federations, which are, in most cases, representative structures at the national level. ESU, as consultative member, is involved in most EHEA governing structures and working bodies, and this grants them access to policy processes.[45]

For example, when asked about the relationship between the EC and ESU and the mechanism through which the EC influences the BP agenda and ESU priorities, one of the interviewed BP experts and a former ESU president claimed this was similar to any other relationship between two actors with (at least) a common political interest and objectives:

> *After 2015/2016, when the European Commission introduced equity within the higher education system and agenda, there was a policy discourse quite prominent within the national contact context. Suddenly, there was a lot of talk about Europe 2020 and the*

[45] A former BFUG delegate, from a different country than the ones under consideration, shared that at the BP structures level "student representatives were the most knowledgeable; they were excellent and very professional; their level of participation was extremely valuable and important" (Europe#2).

> *fact that there are not enough young Europeans who can fill the labour market demand; the European Commission has expanded its discussion to equity and widening access at the higher education level. Within this context our interests started to merge more and more and the European Union and ESU became part of an interest coalition. Overall, we had a good relationship with the EC, it has never stopped financing the ESU. ESU's competition for EC funding for its projects was a fair process, the Commission was also supporting the publication* "Bologna through Student Eyes" *and building the capacity of student organizations at the national level so they can address further the topic of student-centred learning, the social dimension and its implementation, and there is also the so-called administrative type of funding which the Commission is giving to all the umbrella-type structures at the European level regardless of whether they are universities, students or professors* (Europe#1).

Dakowska and Harmsen (2015) have also pointed out the role of international organizations as 'norm entrepreneurs' in the European HE sphere, with international organizations playing a major role in pushing forward the modernization agenda for HE. In the BP case, the mechanism of change occurs when the EC's interests converge with the above-mentioned transnational organizations and their national members. One of the interviewed BP experts stated that "international organizations are saying we are going in that direction and everyone has to come that way, but you all have different instruments. There is a collective movement happening both outside and inside the nation. You must look for what I would call coincidence of interest - you must have that coincidence of interest, otherwise it cannot work" (Europe#5).

With regard to SD policies, the most representative, legitimate actors for supporting students' rights are the national student unions. In Moldova, the Students' Alliance of Moldova (ASM), a unique umbrella organization for the associative student sector and an ESU member, portrays itself as fighting for student self-governance, for mechanisms of student representation, for partnership in the education process, and representing students' interests in relation to key decision-makers at the national level in the field of youth and education. Given what it is and what it stands for, as stated in its mission and vision, the Alliance should be consulted by the Education Ministry when it comes to educational policies; however, as mentioned by the president of the National Youth Council, this does not happen (Md_Nat#3). In response to this, an Education Ministry representative expressed the view that student representatives are "lazy and rather indifferent" towards national level-policy making processes (Md_Nat#4). A general observation about student representation in Moldova is that, with few exceptions, the sector is rather weak and student organizations do not have the necessary skills and capacity to advocate and represent students nationally.

Over time, the most common student related-issues in Portugal have concerned financial cuts to HEIs (which directly affect students), tuition increases, accommodation, and scholarships. As mentioned, through the ESU more information about the BP is slipped into the student organizations active at national level. It is assumed that, once familiar with the BP agenda, it will become clear to students that they are part of a common struggle and have a common interest to act with regard to the SD. In Portugal, the lowest level of student representation is at the faculty level; these structures are then part of the university-wide associations, which in turn are part of the academic federations at the city and regional levels. A nationwide platform, ENDA (the National Association Boards Meeting), brings together on a regular basis different structures of student representation in Portugal, whereas an external structure, FAIRe, the Academic Federation for Information and External Representation) represents students at the international level. Of the five student representatives in Portugal, one or two of them had a basic understanding of the BP. Indeed, no representative of FAIRe was interviewed, since during the fieldwork no common meeting time was ever agreed upon with its representative, who was also attending the ESU's European Students´ Convention. Concerning students' role in fostering the SD at the national level, it can be claimed that the decentralized student representation system creates filters that prevent information from flowing and common advocacy efforts become less tight. As revealed by the former student representative, information "stays at the high level," sometimes for obvious reasons (Pt_Nat#5).

In Romania, the National Alliance of Student Organisations (ANOSR), an ESU member, stands out as an important stakeholder in the Romanian HE policy-making landscape. The student organizations in Romania developed quite a strong capacity in the last decade, with the leaders of such organizations coming up with evidence-based research and strong arguments when discussing with decision-makers. A former student representative at the national level pointed out that starting in 2005, the ESU has generated a new type of discourse about the BP through their Romanian student organization membership: "the federation has imported from ESU all the practices and content - and this was reflected in the priorities of the organization. These concepts and approaches have been translated into laws later on, most of them. We have imported from ESU because we were in a transition period from all possible points of view. Even before ANOSR there was a series of researchers and experts who were aware that there is a need for these types of approaches" (Ro_Nat#3). The Romanian national level student representatives saw the ESU as an opportunity to bring European trends and

practices into Romania: "throughout our position papers, we cite ESU all the time" (Ro_Nat#8). Romanian ESU members, like the others, have been trained in what the BP is about and stands for, and students associated it with "modern higher education, openness towards the West, new teaching technologies, quality, student rights, with all we considered beneficial for higher education. Whereas, we associated the Soviet legacy with corruption, etc." (Ro_Uni#15).

Reflecting on the hypothesis that the incorporation of implementers and target groups into the decision-making processes at the BP level and their support affects the adoption of QA and SD policies, the following remarks can be made. Transnational organizations in the field of QA provide different types of incentives to national level QA agencies (e.g., institutional recognition) to further propose policy-makers policies aligned with the ones proposed by the BP. In Moldova, the transnational HE organizations like EUA, ENQA or ESU had little impact on policy making. The QA developments in Moldova started to take place through EU-supported capacity-building projects targeting the Moldovan HE system (especially TEMPUS), which later (incrementally) became formalized at the national level. In Portugal, the transnational HE organizations like EUA, ENQA or ESU had a mixed impact on policy making at the national level. For QA, the ENQA and EUA evaluations and their proposed solutions (an independent QA and the ESGs) fit the Portuguese context, which was in search of effective approaches to QA. In the Romanian case, the QA agency felt pressured to adjust its standards and methodologies to the ones promoted by ENQA (and endorsed by the BP), and proposed specific legislation in this respect.

In the case of SD policies, it can be claimed that through ESU more information about the BP is communicated to members of the student organizations active at national level, and on the basis of that information, it becomes clear that there is a common struggle and a common interest to act with regard to the SD. In Portugal, the decentralized student representation system creates filters that block information and common advocacy efforts become loose. In Moldova, it can be noticed that the students' voice is becoming stronger, partially due to their ESU membership, yet the administrative, restrictive, top-down approach to policy-making ignores stakeholders' voices (Huisman, 2019). Moldovan student and youth unions are important actors in promoting SD policies but are slow, mainly due to a policy-making system in a country that does not see youth and students' representatives as equal partners in the policy-making process. In Romania, national student unions contribute to the adoption of SD policies by legitimizing their policy positions based on the BP commitments and their ESU membership

(which provides a set of tools for its members in terms of funding and socializing activities - e.g., training, seminars - to support their work).

To sum up, the mechanism employed for furthering the performance of the QA and SD policies through the EUA/ENQA and ESU's members is very much in line with what the literature refers to as orchestration (Abbott et al., 2015). Orchestration is a mode of governance widely used by international organizations and other governance structures and actors that entails the engagement of intermediary actors on a voluntary basis by providing them with ideational support (technical expertise, formal approval and political endorsement) and material support (financial and administrative assistance) to address target actors in pursuit of the international organizations' goals.

5.5. The Type of Government and its Ideological Preferences

Most of the time, politicians, top decision-makers at the national level and other types of formal, political-administrative institutions and state agencies with a certain competence in HE policy play the lead role in initiating policy change and setting the policy-making agenda at the national level. Interested in why certain policy changes and subjects never come up on that agenda, Kingdon (1984) puts forward the multiple streams framework. The argument here is that there are three main categories of independent yet interdependent streams - the problem stream, the policy stream and the political stream - which intersect at a point in time to produce "windows of opportunity" for agenda setting. The problem stream refers to public problems that attract public attention (manifested through, e.g., crises, attention-raising events) which require government action. The policy stream comprises a series of experts and analysts who analyze such problems and offer a variety of possible solutions and possibilities for policy action. Finally, the political stream encompasses actors (e.g., interest groups) and factors (e.g., the intensity of the problem) that influence political bodies so that the policy and the problem streams couple. Kingdon (1984) claims that at critical junctures, and/or when operationalized by policy entrepreneurs, these independent processes or streams are coupled and "the greatest policy changes" occur.

The most representative, knowledgeable, and legitimate actors to propose or amend HE policies are the ministries of education (or the corresponding structures) and their subordinated structures or agencies. Their main role is to incorporate into national laws and regulations specific policy provisions, principles, action lines, or directives while taking care to balance constituencies' interests. Taking into consideration that body mainly responsible at the national level for adopting HE policy is the national government, it is hypothesized that the type of

government and its ideological preferences are crucial in adopting HE policies in line with the agreed ones at the BP level. The proposed hypothesis states that the more aligned governments' preferences are with the BP commitments, the higher the speed with which BP policies are adopted.

5.5.1. Moldova

Since 2005, when Moldova joined the BP, it has had around 10 governments, with most prime ministers serving two mandates. Before joining the BP, Moldova had a leftist government (Vasile Tarlev I and II, and Zinaida Greceanîi I and II) between 2001-2009. Despite being leftist, these successive mandates had several right-oriented economic policies including a tax amnesty, a 0 % profit tax, and extensive programs with the IMF. Then a center-left government followed until 2013 (Vlad Filat I and II) with a European orientation, then a center-right one until 2015 (with Iurie Leancă, Chiril Gaburici and Valeriu Streleț), and from 2016 to 2019 a center-left government (with Pavel Filip). Unlike in other European countries, the Moldovan left represents more conservative, traditional values (skeptics towards women's rights, LGBT, religious diversity) than the political right, which is more liberal from this point of view. The left is rather a hybrid: conservative, but with social policies. It has been more prone to opt for social policies - higher allowances, higher social benefits. Despite their differences in values and economic policies, Moldova associates the left with being "pro-Russian" and the right with being "pro-European".

When asked what the tendency is of different types of governments towards the BP, a ministry representative from Moldova pointed out that before the country's actual membership in the BP, the Government of that time [Tarlev I and II - April 2001 – 2008] established a permanent council in charge of adjusting, correlating and preparing normative acts and legislative frameworks which allowed Moldova to implement the BP commitments (Md_Nat#4). Moreover, the respondent stated that the BP had been promoted "sufficiently actively" by the communists; "between 2005 and 2010, when we still had communists, things were moving slowly; after 2010, for example, when the democrats were in place, the things were a bit faster" (Md_Nat#4). Other than that, a university representative stated that top decision-makers and politicians bring in education and youth issues just during electoral campaigns: "students are one of the most organized categories of actors and voters" (Md_Uni2).

With regard to QA policies, it has been mentioned that Moldova did not incorporate the ESGs and did not create a QA agency until after those policies had been promoted by the BP.

As one national level expert from Moldova contended, the type of Government could have been the main factor affecting this late adoption. The interviewee states that in his four years of activity in the field of establishing a QA agency, there have been around four ministers of education, each of them with different approaches:

> *the ones from the Liberal Party were asking us to follow their directions strictly, and of course we had some ideological clashes and our relationship became cold, but not for long time because they left in a short time and currently [as of May 2018] I am happy that the new team within the Ministry of Education is from academia and they see things exactly as we [ANACEC] see them* (Md_Nat#2).

A representative from the Education Ministry in Moldova also pointed out political factors and their effects on the creation of a QA agency (Md_Nat#4). It was stated that before having a national level QA agency, the Accreditation Direction was subordinated to the ministry, and the Government [of 2000-2002] considered it too early to have an independent agency for this. Later, in 2008, two or three similar agencies merged, the political landscape changed, and starting with 2010, discussions about the creation of a QA agency as promoted by the BP emerged among the key HE actors. When it comes to the adoption of the ESGs, the same interviewee pointed out that before Moldova had a QA agency, universities were encouraged to incorporate the 2005 ESGs in their practices; with the establishment of the agency, a new methodology was adopted in line with the ESGs 2015 [the Agency creates its own decisions, communicates them to the ministry, and the ministry submits them to the Government]. The staff from the QA agency pointed out that the adoption of the ESGs 2015 was highly facilitated by their official translation into Romanian and by favorable input from HEIs representatives, including the Rectors' Council, which shares objective of improving educational offerings. In addition, the Education Ministry acknowledged that there is a need to have such a system in place mainly because Moldovan universities need to be recognized and acknowledged as quality HE providers (Md_Nat#2).

A former student representative recalls an international training held in Moldova in 2013, organized by ESU and the Romanian national student union (ANOSR) with regard to student participation in QA, an event attended by representatives from the Education Ministry [Loretta Handrabura, Vice-Minister for Education between November 2009 and July 2015] who discussed the lack of a QA agency at the national level with the students and the existence of a proposal on the ministry's agenda to establish one. The interviewee points out that within half a year or so the Moldovan students who had been part of the training have been invited to the ministry for a consultation on the structure of the agency (Md_Uni#1).

As far as student input is concerned, in Moldova the issue is not as much with the type of government but with the Education Ministry and the closed nature of the system itself due to the heads of different sections: "regardless of the minister in charge, the Education Ministry was always the one that was the least open of any ministry. The people there simply do not understand the added value of including students' opinions about educational policy" (Md_Nat#3). A former youth activist pointed out that the Education Ministry included representative student or youth voices only when it was needed to legitimize their decisions (Md_Uni#2). Similarly, a national level student representative pointed out that while ESU membership increased the organization's legitimacy before the Education Ministry, the students themselves were not taken seriously (Md_Nat#1).

5.5.2. Portugal

The lack of solid data collected through the fieldwork in Portugal is complemented in this section by academic studies on the topic. A general overview of government's role on the Portuguese HE scene shows that after the 1980s, the model of state control was replaced with the model of state supervision (Magalhaes et al., 2013), meaning that the central government reduced its interference in the governance of HEIs. This move was backed by awarding the HEIs their autonomy and power to self-regulate.

Between 1995 and 2002, Portugal was governed by a center-left government (*Partido Socialista*), with António Guterres as Prime Minister. Then followed a center-right liberal-conservative government between 2002-2005 (PM Durão Barroso and later Santana Lopes). Between 2005-2011, a center-left government was in place (*Partido Socialista* with PM José Socrates). The social democratic government partner from the same conservative center-right liberal government of 2002-2005 then governed in 2011-2015 (PM - Pedro Passos Coelho). A minority socialist government was formed by the Socialist Party (*Partido Socialista*) led by António Costa and made an historical alliance with the left Portuguese parties.

Amaral, Tavares and Santos (2013) claim that the new government elected with a majority in Parliament in 2005 emphasized increasing the efficiency of the higher education sector and enhancing its effectiveness and accountability. New HE governing bodies were put in place, the number of legal instruments produced increased in this period (see section 5.2), and they tackled almost every aspect of HE.

With regards to the SD, one of the interviewed staff members and a student services officer observed that there is a close link between the type of government and the HE policies it promotes: "Because we have a new government [as of 2015] and this government is a mix

of left-wing parties, and left-wing parties, let's say, pay more attention to social issues, this government includes also persons with disabilities, so they are more oriented towards these issues than other governments" (Pt_Uni#1). Moreover, it was added that the same government created a more inclusive policy-making process by forming a working group which focused on access issues especially for people with special needs. While it is not clear whether these changes occurred due to the BP or not, they can be attributed for sure to the type of government.

A current representative of the Portuguese government (part of the 2015 socialist minority government) acknowledged the contribution of the BP in fostering HEIs' autonomy and quality throughout the EHEA:

> *Also, in Portugal, we certainly adopted best practices for accreditation and quality based on our independent agency. Although autonomy and accreditation are strong and very important and critical pillars for higher education, they are not enough to really move forward into a holistic view of higher education* (Pt_Nat#6).

What is further needed, according to the ministry representative, is a closer link between education and research, a student-centered approach to HE, a more critical role of teachers in the educational process, and opportunities for career development for both teachers and students. Moreover, it was stressed that there is a need for external linkages with the social context and more social and economic engagement of the HE sector (Pt_Nat#6). The representative also pointed out the (global) social responsibility role of HE, especially in the Portuguese and European context. It was claimed that the EHEA needs to contribute to empowering those for whom HE is in an emergency state (e.g., Syria), but without contributing to the brain drain phenomenon (especially for students from African countries): "Portuguese higher education is very active in attracting and providing the necessary resources for those students. The current government has just adopted an act that provides social support to such students, so they have the necessary support to participate in higher education" (Pt_Nat#6).

5.5.3. Romania

Starting in 1998, Romania had a center-right government (Victor Ciorbea, Radu Vasile and Mugur Isarescu); then followed a four-year period of a leftist government (Adrian Nastase) and another eight years of a center-right, liberal government with social democratic acceptance (indirect support from the Social Democrat Party) (Calin Popescu Tariceanu I and II, and Emil Boc), followed by a period of leftist rule between 2012-2018 (Victor Ponta I, II and III, Sorin Grindeanu and Mihai Tudose), interrupted by a caretaker government between 2015 and 2017.

In the last decade, few innovative initiatives were happening at the HE level and this was mainly because of the political instability of the country which brought along constant

changes within the ministry of education (ministers change in few months, they are responsible for all levels of education). Adoption, therefore, depends very much on the government and the political risks it engages in and the time it has to focus on the HE sector. In this study Romania is the country with the highest number of ministers of education. Since joining the BP, Romania has had 24 mandates for the Education Ministry. This has the potential to negatively influence policy making, since inconsistencies can disrupt legislative proposals and policy initiatives. As one of the interviewed deans mentioned, among these ministers "some were the right people, some were not. Unfortunately, the right people stayed for shorter periods. Some of them were totally stupid, dumb, inept. We had three categories: the awful ones, the medium ones, and the dumb ones" (Ro_Uni#13). It was further added that the value system of the minister matters more than the governmental structure he/she is part of. While it does not make a great difference, a certain level of variation can be noticed in terms of policy output:

> *Ecaterina Andronescu also did things with some kind of coherence - not that I agree with all her proposals; Liviu Pop is one of the catastrophic ministers – he is not working according to a system of values - it is total chaos, the measures contradict each other (in Romanian "*Se calca in picioare reciproc masurile*"); we have had ministers who were more balanced, willing to listen, and we had "bulldozer type" ministers who have implemented whatever crossed their minds. Marga, for example, had a vision and he wanted to impose it"* (Ro_Uni#13).

When Romania hosted the BFUG secretariat, the preparations started in 2007-2008. One interviewee involved in the Romanian Secretariat revealed that the political support of the ministry matters very much in hosting the Secretariat, and it was very important that the ministry prioritized this: "Romania also had a desire to have some input in the Declaration so that it reflects parts of their domestic priorities" (Ro_Nat#1).

It was further revealed that generally there were no governmental discrepancies vis-a-vis the BP. A former Education Minister claimed there was consistency in that regard across government types (Ro_Nat#6). Another respondent, more critical in this respect, claimed that "in Romania every minister tried to do major reforms. With regards to QA, the BP created a pace for each government, because they could not come with a different approach, but there was a fluctuation with regard to implementation, the rigor of accountability, and responsibility towards the QA agency requests and standards. Some governments were more understanding of ARACIS, others not; some let them develop as a state within state, other governments were more demanding towards them; some governments supported ARACIS financially to implement certain projects, and other governments did not. Currently QA is something that is blocked, it is a joke, nothing happens" (Ro_Nat#2).

The year 2005 was an important one because the Romanian QA agency started to consolidate and the ESGs were adopted at the national level. A former Romanian QA agency staff member pointed out that "at that time there was a bunch of people at the Education Ministry - Miclea, Vlasceanu, people who really wanted to get integrated, to see things change. In my conversations with Mr. Vlasceanu this was not perceived as some type of control, rather, they were of the idea that if we are still trying to get closer to Europe, we should start with the first levels" (Ro_Nat#5). "After the 2015 ESGs, ARACIS did not respond in this respect. There was a reaction, but it is a late one. ARACIS also is at fault here because it should have proposed many other methodologies" (Ro_Nat#5) and it was "portrayed as a politicized structure that acts according to the HEIs' demands" (Ro_Nat8). As a response to this allegation, a current staff member of the QA agency states that "the speed with which you can implement this depends on very many aspects - and there you cannot assume that there is a line and everybody and everything will go hand-in-hand with it" (Ro_Nat#4). What the staff proposed was that the ministry change an annex of the 2005 decision to incorporate the new ESGS: "the Education Ministry is to assume this policy change. We had no observation from their side, the Education Minister sent it to the other ministries which also had to sign it to approve it, and afterward it became an official document" (Ro_Nat#4). When asked whether there was a need for a new methodology, the staff stated that this was highly needed, but its QA council could not modify certain procedures which needed to be approved through a governmental decision. Other respondents pointed out that the QA felt under pressure from the upcoming ENQA review and had to speed up the adoption of the new ESGs (Ro_Nat#5).

With regards to the SD, similar to the Portuguese case, student representatives in Romania pointed out the politicization of student unions and how their affiliation influences the policies they promote and support at the national level. In Romania there have been three student federations that do not cooperate with each other, but rather compete. Besides the already mentioned ANOSR, "in 2001, the Social Democrat Party founded USR – the Union of Romanian Students and later in 2007, the National Union of Romanian Students was founded" (Ro_Nat#8). One of the interviewed student representatives at the national level stated that decision-makers were rather reluctant to cooperate with student organizations just because of their politicization. In turn, political actors tried to influence the student movement many times, especially before elections. For example, despite their differences, the student federations did common advocacy work through campaigns and debates on different HE issues, such as scholarships, transportation and canteens: "the result was a document with certain recommendations, and we asked politicians to have a meeting and sign a protocol with us. We

told them 'Choose what you would like to support and put down your signature'. Just three of five parties signed our proposed protocol: The Social Democrat Party, The Alliance of Liberals and Democrats, and The National Liberal Party" (Ro_Nat#8).

It was further mentioned that students were using every opportunity they had when a legislative proposal was on the table (e.g., sending position papers to members of different political parties), regardless of the political orientation of the party: "We are looking for those who are open and willing to help, even those parties that we know do not like us. I think it is good to work like this directly, informally, and not only formally through institutions (which is quite difficult)" (Ro_Nat#8). A former student representative reflected that almost a decade ago, when discussing with policy-makers and universities, students were legitimizing their claims based on the BP "even though we had no clue what it really was about, and we emphasized that the universities should do more" (Ro_Uni#12).

This section has aimed to test the hypothesis that the more aligned government preferences are with the BP commitments, the higher the speed at which the QA and SD policies will be adopted. For HE policy, national governments and political actors act as gatekeepers through which key decisions become nationwide policies. For both QA and SD policies, it became clear that the support of domestic actors who also participated in BP-related activities and structures (understood here broadly) contributes to bringing the national policies closer to the ones promoted by the BP. For the specific case of QA, BP-affiliated QA transnational structures like ENQA and the EUA provided additional incentives for national decision-makers and QA agencies (if they existed) to align their practices to the ones promoted at the BP level, since they provide standards across the EHEA that need to be met and maintained. QA agencies propose new methodologies to their governments by legitimizing their approach through the BP. Likewise, ESU has proved to be an important channel through which student demands are further advanced at the national level. The ESU's transnational membership, its work on capacity building for its members, and its general advocacy work create synergies between supranational and national policy making. In short, BP structures like ENQA, the EUA or ESU prefer to collaborate with those domestic actors who are in favor of their promoted policies, be they QA agencies, ministries, or student organizations.

The extent to which the type of government matters is an issue of government stability, the approach to policy making (top-down, bottom-up), but also ideology (on the political spectrum). Legislative initiatives of any type require time until they are adopted (e.g., proposed by different interest groups, supported by policy makers, debated, adopted by different

chambers of the Parliament, etc.), and what some governments have worked on can be formally adopted in the next government. Associating HE policy changes with government type assumes a thorough analysis of the policy-making process and of the main actors involved at the political level (e.g., different parliamentary commissions, former education ministers, etc.). This dissertation presents severe limitations in this respect. The added value, however, is that it presents insights into the mechanisms through which key stakeholders and actors interact with governmental representatives and decision makers.

5.6. The Policy to be Adopted

The last hypothesis put forward for explaining adoption refers to the policy to be adopted. It was hypothesized that it matters from various perspectives, including whether it fits existing policies, institutions or practices, whether it is needed to solve an existing problem, and whether it is clear to the main stakeholders what it aims to achieve and how it should be put into practice. It follows that the degree of complexity, fit and clarity of QA and SD policies considerably influences the adoption stage. In the case of HE, the type of HE system, the traditions participating countries have, and their approach to policy-making in the educational field constitute important variables to consider when assessing the extent to which the type of policy to be adopted matters.

If, in the section on implementation performance, there was a focus on the adoption and transposition of QA and SD policies after the country joined the BP as a behavioral change implied by the new membership, then this section looks, on the one hand, at the existing policies in two areas prior to BP membership as way to test the degree of policy fit and existing path dependencies; and on the other hand assesses whether the policies in question contributed to addressing a policy issue in their national context.

5.6.1. Moldova

Moldova presented some form of progress with regards to QA and SD policies and frameworks already prior to its BP membership. This is highly relevant for the current research project, since the legacy of certain policies can be a factor affecting adaptation to new policies. Such a mapping exercise is important for understanding what has already been in place in a given county's HE sector. The existence of certain national level frameworks and policies is important also for exploring whether external initiatives/models do indeed bring something new or are just tools to reclaim/redress/adjust certain policies.

With regards to QA in Moldova, it can be argued that this was an issue on the national agenda since the first years of transition. Several laws in the early 1990s (Law 1995/37, 1997 and 1999/423) included specific provisions on licensing, evaluation, and HEIs accreditation. In 1997, a law targeting the evaluation and accreditation of HEIs was adopted, and in 1999 a Governmental Decision founded CNEAA - the National Council for Evaluation and Accreditation. In the early 2000s, further regulations regarding the creation of academic evaluation commissions were adopted, following the creation of a Higher Education Accreditation Direction within the Ministry of Education and the National Council on Accreditation and Attestation. In 2004 Moldova launched a 10-year *Higher Education Strategy for Moldova within the Bologna Process Context* which had both QA and SD provisions (e.g., targeting socially disadvantaged groups). More recently, the government decided that the National School Inspectorate, which was not making much progress in its work; the Accreditation Council, which was facing a legal impasse, maintaining practices from the Soviet times; and ANCIP, the National Agency for Quality Assurance in Professional Education, should be merged into one unit: ANACEC, the National Agency for Quality Assurance in Education and Research. Currently, ANACEC is responsible for "promoting a quality culture from kindergarten to PhD studies" (Md_Nat#2).

In Moldova, there were also issues with declining student numbers, and universities feared they might wake up one day and realize they could not attract students, a fact that would have negative financial implications for the academic staff. The implications of not implementing such QA policies, or lagging behind, would have negative consequences for the society and for the existence of Moldovan universities (Md_Nat#2). Moldovan universities need to be recognized and acknowledged as quality HE providers (Md_Uni#2). In the same line, it was stated that there was an issue with the recognition of existing evaluations of universities and study programs, an issue that could be solved by establishing an independent national QA agency, recognized by ENQA (Md_Nat#2).

With regard to the SD, one ministry representative claims that in Moldova, the SD is one of the chapters the country performs quite well. Most students receive scholarships; they can get a tuition-free place for different study levels (between 30-50 % of all students), subsidized dorm places, discounted transportation, and there is a 15 % quota for disadvantaged, underrepresented students or students with disabilities (around 11 categories of such groups). It was stated that most of these policies had been started in the former Soviet political system and this is one of the areas Moldova decided not to give up (Md_Nat#4).

5.6.2. Portugal

In Portugal, prior to the BP, legislation from 1994 (Law 38/1994) established the basis of a national system for assessing HEIs. The Council of Rectors of Portuguese Universities (CRUP) played an important role in promoting QA laws at the national level even prior to the BP. One of the interviewees revealed that CRUP had a strong influence. International organizations like the OECD had always had a strong voice in national policy making. For example, in the 1980s, the existent QA structure at the national level has been dismantled because "there were no consequences. They evaluated, they made some reports, but the institutions did not know if the evaluations were good or bad; they did not close any programs; there were reports, but there were no consequences from all this process" (Pt_Nat#4). In this context, the ministry called on the OECD, which developed a proposal for the quality reorganization of HEIs and systems (Pt_Nat#4).

Concerning the social dimension, a former state advisor on HE stated that Portugal's responses to it depended on the economic situation of the country and on the major problems of the time. When asked whether an integrated, national level framework would be needed in Portugal in this respect, it was stated that "it would be relevant to have one, but probably it is not yet a priority because there are other problems to solve before that. We have high unemployment, we have huge debt, which is also a problem, the economy is not growing as fast as it should - now it is improving, so those are probably more important problems" (Pt_Nat#3). Stressing the financial context of the HE system, another respondent pointed out that despite advice from different groups of actors (especially CRUP), policy changes depend "on the budget, on the ministries, on the policies of the Government. The main issue is the budget for universities and the distribution of this budget between universities" (Pt_Nat#3).

5.6.3. Romania

Similar to the other two countries, Romania also presented some form of progress with regard to QA and SD laws and frameworks prior to its BP membership. Law 88/1993 established procedures for the accreditation of HEIs and diploma recognition and the basis for CNEAA – The National Council for Academic Evaluation and Accreditation. According to the ARACIS website,[46] this was driven by the mushrooming of private HEIs, but there was also a rapid increase in terms of faculties, study programs and specializations.

[46] ARACIS: https://www.aracis.ro/istoric/

As a Romanian interviewee argues, prior to the BP all the countries from the East began implementing the accreditation of programs. In Western Europe they began with the QA policies, but in the East there was a need for accreditation, because after the fall of communism or dictatorship, the opening of the free market, and the mushrooming of private universities, there was a desire to create some kind of order (Ro_Nat#5). When asked whether there was compatibility between what the BP brought and what Romania already had with regard to QA, one interviewee stated that "We were always concerned for the quality of education even in communist times. We had QA policies, but they were not as structured as the ones promoted by the Bologna [Process]" (Ro_Nat#4). Moreover, when asked what can explain the popularity of QA policies across the EHEA, one former QA representative stated that on the one hand, QA is about money - "it is transformed into financing", and on the other hand it contributed to controlling the massification phenomenon, to a certain extent (Ro_Nat#5).

The SD in Romania was also a well-developed policy area. In 1990, HE became free of charge; one year later, Governmental Decision 625 provides a frame for different types of scholarships and social assistance for students in need. In the following years, the scholarship system is extended, a system of loans is adopted (but never launched), and affirmative action measures are taken targeting Roma students, with Education Law No. 84/1995 providing alternative forms of learning that encourage the participation of various underrepresented groups.

With regard to policy complexity, fit and clarity, in Romania for example, it was claimed that "similar to student-centered learning or institutional autonomy, the social dimension is part of those BP policies that are not well-structured or that are unstructured and therefore not easy to deal with; it's not provable through law and it also implies a cultural change, not just a normative change. I think these characteristics make it normal for this policy area to slow down" (Ro_Nat#1). Moreover, like in the Portuguese case, it was mentioned that the SD measures imply some financial burden: "on the one hand you need a budget, on the other hand, there is not that much interest from the decision-makers' side - it does not sound attractive from a political point of view" (Ro_Nat#3).

To conclude, the characteristics of the QA and SD policies have a direct influence in adoption and further implementation. For the specific case of QA, in all three countries, decision-makers considered there is a need for clear evaluation processes. All three countries had some form of QA structures at the national level, or at least aiming to promote QA goals. With time, such QA structures evolved from national accreditation and evaluation councils into

QA agencies in line with the BP-required standards. QA policies were considered solutions to existing challenges and issues.

While SD policies were not well developed in Portugal, both Romania and Moldova inherited or continued certain SD policies as a result of the political system they had been part of. In Romania, most of the structural SD measures were taken in the early transition years, and more recently, due to the advocacy and lobby work of the national student organizations, important changes have occurred (e.g., better housing conditions, free train transportation, increase in social scholarships).

Last but not least, it can be argued that both policy areas under consideration differ significantly as portrayed by the BP structures (see section 3.3.). An important difference is in the policy instruments at the BP level: since 2005, QA policies made use of the ESGs, whereas for SD policies a more defined instrument (e.g., guidelines on how to build a SD strategy) was not adopted until 2015. While in the first case it can be stated that these instruments facilitated national level adoption, in case of the SD this did not apply in the countries under consideration (Croatia, Ireland and Austria were some countries that planned at the national level to have a SD strategy). Across the interviewed actors, it was revealed that SD policies require extra resources and, at the same time, are not considered top priorities for national governments.

5.7. Conclusions

This chapter was dedicated to explaining the differentiated integration of the BP and the policy changes and reforms taken by participating countries and HEIs by focusing on adoption as one of three implementation stages. Exploring the context in which the countries under consideration joined the BP, it was revealed that both normative and instrumental motivations for joining the BP were important factors to further reform. The implementation performance data showed that the countries under consideration present different levels of BP integration with regard to time, space, and matter. Even though the adoption of QA and SD policies does not occur simultaneously in the three countries, similar processes could be identified in all three countries for each of the specific policy areas. Looking at the developments within the BP with regard to SD and QA on the one side, and other HE national developments on the other, it can be claimed that no causal link can be made between the two. One of the caveats here was the difficulty in assessing the measures taken within the framework of the BP, because HE policies are embedded in a wider policy-making context. What the BP promotes is not unique, and these policy changes were not always the result of the BP, but of

governments' policy initiatives and reforms, shaped by national contexts, debates, and the HEIs' autonomy.

Table 11 provides a summary of the main findings with regard to adoption. The table uses a point scale from 0 to 4 (0 - Not at all important, 1 - Slightly important, 2 - Important, 4 – Very important) to indicate the extent to which the factors under observation matter in national level policy adoption.

Table 11. Adoption - summary findings

Factors influencing adoption	Degree of importance	Context
A1. National representatives' participation in the Bologna Process decision-making processes	Slightly important	The three countries under consideration had little input into the BP agenda. This might have considerable implications for the lack of implementation at the national level since what is agreed upon does not reflect national priorities and capacities.
A2. The incorporation of implementers and target groups in policy-making processes at the Bologna Process level	Very important	Through their transitional representative structures, higher education institutions and students participate in BP follow-up processes and use the BP to demand further changes at the national level.
A3. The type of government and ministerial structures	Important	The extent to which the type of government matters is an issue of government stability, the approach to policy making (top-down, bottom-up), but also ideology (on the political spectrum).
A4. The provision of the policy to be implemented	Very important	Policy adoption is a result of a coupling between the existing policy instruments and those policies' potential to address an issue at the national level.

The first hypothesis stated that participating countries' meaningful participation in policy-making processes (between the ministerial conferences), and their bargaining power in putting onto the BP agenda issues they consider relevant for their national HE context, contributes to the likelihood of BP policies' adoption at the national level. The interviewees supported the claim that the three countries under consideration had little or no direct policy input onto the BP agenda. It was also revealed that, on the one hand, these countries did not have strong preferences that could be uploaded onto the BP agenda, nor did they heavily bargain for certain policies. On the other hand, the three countries had little or no direct policy input onto the agenda by being involved in the follow-up structures and governance of the BP. Such developments leave room for policy and political directions to be set by those who spoke up the most and dominated the discussions in the follow-up structures, those who also tend to have more expertise and to be better prepared around the ministerial meetings. This can pose

considerable implications for lack of implementation at the national level since what is agreed upon does not reflect national priorities and capacities.

The second factor looked at the incorporation of implementers and target groups into the decision-making processes at the BP level and their support for national level QA and SD developments. It was found that in terms of QA policies, the transnational organizations in the field of QA provide different types of incentives to national level QA agencies (e.g., institutional recognition) which further propose such in-line policies to be adopted by top policy-makers. In the case of SD policies, it can be claimed that through the ESU, more information about the BP is communicated to members of the student organizations active at the national level, based on which it becomes clear that there is a common struggle in which the organizations are engaged and that they have a common interest to act with regard to the SD.

For both QA and SD policies it became clear that the support of domestic actors who also participated in BP-related activities and structures contributes to bringing national policies closer to the ones promoted by the BP. For the specific case of QA, BP-affiliated QA transnational structures like ENQA and the EUA provided additional incentives for national decision-makers and QA agencies (where they existed) to align their practices with the ones promoted at the BP level, since they provide standards across the EHEA that need to be met and maintained. QA agencies propose new methodologies to their governments by legitimizing their approach through the BP. Likewise, the ESU has proved to be an important channel through which student demands are further advanced at the national level. The ESU's transnational membership, its work on capacity building for its members, and its general advocacy work create synergies between supranational and national policy making. In short, BP structures like ENQA, EUA or ESU prefer to collaborate with those domestic actors who are in favor of their promoted policies, be they QA agencies, ministries, or student organizations.

For HE policy, national governments and political actors act as gatekeepers through which key decisions become nationwide policies. The extent to which the type of government matters is an issue of government stability, approach to policy making (top-down, bottom-up), but also ideology (on the political spectrum). Legislative initiatives of any type require time until they are adopted (e.g., proposed by different interest groups, supported by policy makers, debated, adopted by different chambers of the Parliament, etc.). This dissertation presents severe limitations in this respect. The value added, however, is that it presents insights into the

mechanisms through which key stakeholders and actors interact with governmental representatives and decision-makers.

Finally, the characteristics of the BP policies to be adopted matter. For the specific case of QA, in all three countries decision-makers considered there is a need for clear evaluation processes. All three countries had some form of QA structures at the national level, or at least aiming to promote QA goals. QA policies were seen as solutions to existing challenges and issues. It can be argued that both policy areas under consideration differ significantly as portrayed by the BP structures. An important difference lies in the policy instruments at the BP level: since 2005, QA policies have made use of the ESGs, whereas for SD policies a more defined instrument (e.g., guidelines on how to build a SD strategy) was not adopted until 2015. While in the first case it can be stated that these instruments facilitated national level adoption, in the SD case this did not apply to the countries under consideration. Across the interviewed actors, it was revealed that SD policies require extra resources, and at the same time, they are not considered top priorities for national governments.

6. Transposition at the Administrative Level

This chapter is dedicated to answering the research question by focusing on transposition as one of the three implementation stages in the implementation of the BP (see Chapter 4, section 4.1.2.). The overall dissertation aims to explain the differentiated integration of the BP and the policy changes and reforms taken by participating countries and HEIs. The sub-research question this chapter addresses is: *What are the factors explaining the transposition of the Bologna Process' QA and SD policies at the national level?*

As mentioned in Chapter 4, transposition is understood here as the separation of a policy from the political level to the administrative level and its organizational implementation machinery; from the top decision-makers and the different layers in the administrative system, including formal political-administrative institutions and agencies, representative organs, or state or regional agencies and structures with a certain HE competence. Transposition to a separate implementation stage allows for both top decision-makers and final policy targets to communicate and exchange preferences. It is the point where top-down and bottom-up approaches meet in the policy-making process. As stated before, sometimes transposition occurs prior to adoption, meaning that a thorough analysis and calculation has been made before a policy issue was legally adopted. In other cases, legislative amendments take place over time in order to update existing regulations.

This chapter aims to test the analytical model and hypothesizes that transposition can be a result of several factors including (1) national representatives' (e.g., civil servants in ministerial units, administrative and academic bodies, etc.) meaningful participation in policy-making processes both at the BP and at the national level, and the extent to which they feed back to the principals (top decision-makers) and disseminate the information acquired at the BP level to other subunits or structures within the HE policy sector. Following the literature on policy networks in policy formation (Peterson, 2003), the chapter digs into the potential of domestic HE experts and well-organized interest groups in determining specific policy outcomes by using BP norms. Besides this, as the most representative and legitimate actors, HEIs' and students contribute to HE policy-making through their grassroots input.

Secondly, since at the administrative level governmental agencies and bodies (with competences in HE), and the academic community participate in a series of (organizational) socialization processes, this chapter hypothesizes that (2) the support from the HE community and their interactions with the wider BP community across the EHEA affects the choice of specific policy instruments and implementation mechanisms. The subsection addresses the

socialization processes that the governmental agencies and bodies, societal actors, and the academic community take part in and the extent to which such practices shape policy preferences.

Last but not least, considering the character and complexity of the policy to be transposed, the in-charge agency and its politico-administrative context, it can be hypothesized that (3) the decision-making authority, amount of discretion, and capacity for implementation that organizations have (with regard to the policy in question) affects the further implementation of the policy. The subsection focuses on the dynamics taking place within implementing organizations and agencies and their reaction to the required policy change.

The corresponding mechanism states that mutual learning and other socialization processes equip governmental agencies and bodies, societal actors, and the academic community with information about the main developments at the BP level and contribute to national level policy-making by feeding back to national policy makers. The causal model predicts that if BP policies have the support of top domestic actors and structures, this may push the national policies closer to the ones promoted by the BP. As a result, BP structures prefer to collaborate with those domestic actors who are in favor of its policies.

6.1. Participation and Input in National Policy-Making Processes

If section 5.4. of the previous chapter looked at the incorporation of implementers and target groups in BP policy-making processes, this section focuses on how such actors contribute to national level policy making. Based on the conducted interviews, three of actors participate and provide input to national policy-making processes most frequently. This section examines each of these components. Undoubtedly, the highest relevance in this sense refers to those domestic actors who participate in the BFUG and its WGs. Secondly, a new category of actors identified refers to national experts and policy entrepreneurs, who present a mix between national level actors and BP mediators (participating both at the supranational and national level policy-making processes). Finally, the HE community and student representatives, as the main target of governmental policies, react and contribute to such processes. The participation of students, professors and staff in decision-making processes is considered to be a significant component in policy implementation.

6.1.1. National Representatives in the Bologna Follow-up Group and Working Groups

The BP follow-up structures represent fora in which individuals and institutions negotiate and decide what is best, where “all countries can contribute and where they discuss

freely" (Lažetić, 2010, p. 553). As mentioned before, different types of national representatives – civil servants, representatives of the HE community – are delegated to participate in the Bologna Follow-up Group (BFUG) and the established Working Groups (WGs). One the one hand, these structures "provide information and draft policy positions that are consequently discussed in the BFUG and that feed into overall deliberations on positions to be expressed in communiqués of the ministerial conferences" (Vukasovic, Jungblut and Elken, 2017, p. 1423); on the other hand, they serve the purpose of promoting and providing information on the BP reforms at the national level. Through delegation, the agent acquires more and better private information about what is discussed within these structures and therefore has a direct impact on the direction of policy change. This information would benefit the principals (the decision-makers), but the they might not access the information (LeGrand, 2003). The principals can only verify whether an outcome has been achieved through expensive auditing or inspection procedures. This subsection explores the relationship between national delegates in BP structures and their engagement in national level policy making.

6.1.1.1. Moldova

As mentioned in the previous chapter, Moldova has underestimated its role within the BP governance structures. Usually, Moldova would delegate a small number of delegates to the BP structures, most of the time in a consistent manner. Students have been represented within such structures as formally required, but their representation capacity has been insufficient for national level advocacy or further policy work. When asked about the reflection of the BP recommendations or policies at the national level, a BFUG representative claimed that it is rather difficult and complicated to "transfer" the policies approved in the communiqué, especially the new initiatives [referring to the digitalization of HE as presented in the 2018 Paris Communiqué] (Md_Nat#4). This was further elaborated by pointing out that even though there is political agreement at the BP level, there is no capacity to implement the agreed policies at the national level (Md_Nat#4).

A representative from the Ministry of Education in Moldova actively involved in the BP follow-up structures since 2016 referred to her experience with them (Md_Nat#4). The interviewee pointed out that prior to her involvement, another colleague was in charge:

> *I learned from one day to the next that I have to attend the BFUG meetings and I had to prepare because there is a difference between knowing about the Bologna Process and creating policies in line with it at the national level. We had to get involved in the process itself by putting forward recommendations for the ministers in such a way they can easily agree on what should be done* (Md_Nat#4).

To sum up, if Moldavian policy makers engage in policy initiatives at the national level, such processes are rather slow and require long-term preparation for the key stakeholders involved (see QA policies).

6.1.1.2. Portugal

A BFUG national delegate pointed out that even though the BFUG is a technical body, it is also a political one, because delegates define the BP internal policy as agreed with their national governments, "based on their party priorities or the intentions they have" (Pt_Nat#4).[47] When asked about the relationship between BP representation and the extent to which this is reflected in domestic politics and policies, another BP delegate from Portugal pointed out that overall one of the major problems in BP decision-making processes was the fact that Portuguese academics were not sufficiently represented:

> *You could see that the ministry had an influence here because they appointed someone to represent the ministry; you could see that also students had a lot of influence, because they were very organized and their structure was represented in the BFUG; the academics were not represented, there was a kind of union that nobody knew what it was about. So those who were probably the most important people in the Bologna Process were not represented in the BFUG, rectors do not really represent the academics* (Pt_Nat#3).

This BFUG delegate confessed that she was not of the same political orientation as the ministry she was supposed to represent, and she decided to withdraw from this role: "I decided not to continue because I was not a member of the ministry, and I recommended to send a representative of the ministry so that our Government could have a voice saying what our ministries did or did not want" (Pt_Nat#4). While the delegate was not fully dependent on the DGES with respect to her position in the process, there was a back-and-forth communication between the ministry and the delegate: " I brought information, I made always my report, I said what is happening, I said my own perceptions and my own recommendations, but also my point of view and what I thought is important to be implemented or to consider, or to refine the policy for that area" (Pt_Nat#4).

As revealed through other interviews (Pt_Nat#3 and Pt_Nat#1) and the participant observation conducted in the 2018 ministerial meeting and the WG on Implementation meeting

[47] Related to the Portuguese experience, one of the interviewed ministerial representatives in the WG on the Social Dimension (2005-2007), not affiliated with any of the countries in this study, claimed that she was delegated as a representative because their minister was interested in the students' situation: "the idea was that the minister wanted to show others what we have done in this regard. On the one hand, the idea was to promote the student cause, on the other hand, to show others what we have done, to show up in front of the Bologna community" (Europe#2).

in Nice, the Portuguese HE policy-making scene promotes close cooperation between HEIs, students, and the broader policy-making community. In her PhD thesis, Palma (2019) suggests that implementation was fostered by Portuguese "mediators", a small group of experts who circulated between the national and the BP forums, and who interpreted and recontextualized the BP at the national level mainly through the opinion documents needed for the legislative process.

6.1.1.3. Romania

In Romania, a former ministers of education stated that participation in the WGs represents the options, interests, and strategic priorities of the participating countries; the people representing the country are prepared based on what is happening at the national level (Ro_Nat#6). Moreover, he stated that there is a variation with regard to the approach participating countries take towards the BP and their policy-making style in general: "there are countries who have a high level of self-respect, they are very much involved. They have a very powerful administrative and content engine behind them. Their presence in WGs reflects the power of the engine" (Ro_Nat#6). Similarly, an assistant to the Social Dimension WG (2010-2012) mentioned that that there is a big difference between "more advanced countries" that already have SD policies in place, and those countries which experienced a boom in the student body, especially in Central-Eastern Europe, for which it was quite difficult to allocate a certain amount of resources for this type of policies" (Ro_Uni#11).

When asked about the relationship between the BFUG delegation, national policy making, and Romania's implementation performance, a Romanian member of the WG pointed out that Romania's representation varied in quality across time: "it depends on the government in place, who is in charge of the ministry of education, but also on the persons who have been delegated to represent the country (whether they go there for shopping)" (Ro_Nat#2). A former member of the WG on Implementation[48] (dismissed from her position a few months after a government change) referred to her experience:

> *I have been quite disappointed in this position because we used to meet, but nothing happened. From a personal learning perspective this is useful; however, as long as these groups do not have institutional support that could do things better, with permanent staff… In these groups there is a lot of talk about the shape but not the content of key outputs. There is a lot of bureaucracy involved, but there is no decision-*

[48] In November 2016 as part of the current research, I conducted participant observation within WG 2 on "Implementation: Fostering implementation of agreed key commitments" (taking place at the University of Nice, France). The purpose of the WG was to support countries in the implementation exercise, more specifically, to explore different ways of fostering the implementation of the agreed policies. A general observation was that most of the representatives felt rather pressured to come up with the structure of the final report for the BFUG.

> *making role; an instrument and a consultative body have to come up with a report and recommendations the decision-makers can build upon* (Ro_Nat#3).

As mentioned above, Romania is one of the countries with short-term mandates for the Education Ministry, due to domestic political patterns. Likewise, key administrative positions within the education sector share the same struggle: "I cannot understand how in the last two or three years there has been no desire from our side [Romania] to be more formally engaged within the process. Recently I had a meeting with International Relations State Secretary discussing the Bologna delegation [to the ministerial meeting] and the next day he was fired from his position" (Ro_Nat#7)[49]. Such inconsistencies can disrupt the flow of information and communication at the national level, affecting therefore the quality of possible recommendations provided to policy makers and governmental representatives.

While national level dynamics and short-term mandates can pose challenges to policy development, similar patterns can be found at the WGs level. Another WG member recalled that the working plans of the WGs changed from one mandate to another; individua WGs and AGs do not have a clear agenda, and there is a lot of overlap with other such groups - all of this creates a series of problems, including with the quality of work to be delivered by the WGs:

> *The working plan is not so dynamic, and the people are changing from mandate to mandate. They failed to come up with a stable structure that would allow for some kind of continuity. With regards to the co-chairs, it depends very much on the quality of the people who have been engaged in these periods, more specifically, the quality of the people who took certain positions. A strong point is the fact that there is no monopoly on certain issues and there is a power balance with regard to individual countries' participation and input* (Ro_Nat#2).

To sum up, national representatives' participation in the BFUG, WGs and national policy making processes present mixed realities in the three countries under analysis. In Moldova, despite a relatively consistent delegation, national approaches to policy making and the expected implications of the BP policies at the national level (in terms of capacity and resources) hindered an alignment with the BP. In Portugal, the BP "mediators" make an important contribution in creating a common understanding of the BP, but the ultimate policies are shaped by governments' preferences. In Romania, the inconsistent approach to delegation contributes to a filtering of information and impacts the quality of policy recommendations.

[49] At the time of the fieldwork another BFUG representative (who had previous mandates in different WGs) was dismissed from his position right before a scheduled interview.

6.1.2. Experts' Engagement in National Level Policy Making

According to an EC report (2013), in 2004, in consultation with the main stakeholders, the EC proposed to invite academics, students, HEI administrators and other HE experts to apply for a call aiming at the creation of National Teams of Bologna Promoters, envisioned to provide support, counselling and advice to HEIs, as well as inputs to national authorities on HE policy reforms. While EC funding calls for BP experts have ceased to exist for the last eight to ten years, at the national level BP experts exist under different forms of organizations, but with the same envisioned aims promoted by the EC.

6.1.2.1. Moldova

In Moldova, a national network of Higher Education Reform Experts (HEREs)[50] supported by the EC was established in the framework of the TEMPUS program and continued to be supported through Erasmus+. These experts, appointed by the national authorities, constitute a pool of expertise to promote and enhance the modernization of HE. They participate in the development of policies and reforms in their countries, offer recommendations, guide HEIs regarding different HE aspects, and contribute to the training of local stakeholders, organize and participate in seminars, write articles and reports, or provide advice to individual institutions and policy makers. In Moldova, the HEREs have been tasked with contributing to HE reforms and play an important role in furthering the implementation of the BP. As of 2018, there were 7 HEREs, two of whom have been interviewed for this research. The interviewed student representative in the HEREs project stated that it was a good opportunity to create common ground on different HE policies between different groups of national stakeholders, to discuss and debate certain aspects, to do research on specific issues, and most importantly, for students to become more familiar with the representatives from the Education Ministry and create collaborations on the Student Statute or on the role of students within the QA agency (Md_Nat#1).

6.1.2.1. Portugal

In Portugal, CIPES (the Centre for Research in Higher Education Policies) represents one of the few structures at the national level bringing together a variety of HE experts and researchers. Its members provide consultancy, assistance and expertise on HE issues ranging from access to funding, quality, and governance. A CIPES staff member stated that the center

[50] See more at: https://supporthere.org/page/about-action

is in close contact with the Education Ministry (Pt_Nat#3). Because of the staff members' diverse identities (e.g., university representatives, academics, QA agency members, etc.) they are often consulted when it comes to setting up legislation or HE programs.

In the preface to "Higher Education in Portugal 1974-2009 A Nation, A Generation", Teixeira (2012) writes that CIPES, as the only higher education research center in Portugal, aims to become "a center of reference for higher education research" and to engage in academic research and critical analysis about the core issues in the Portuguese HE sector and its international dimension. One of its specificities is that CIPES has contributed to shaping the public debate on HE and in the development of policy studies at the national level. Moreover, it collaborates frequently with the Ministry for Science, Technology and Higher Education and with some of the most important organizations in the national policy-making scene, including the National Education Council (CNE), the Portuguese Council of Rectors (CRUP), the Agency for Assessment and Accreditation of Higher Education (A3ES), etc.[51]

6.1.2.2. Romania

In Romania, a list of around 60 BP experts (and around 20 researchers) has been recently published, indicating their area of expertise and mandate held in different BP structures (e.g., BFUG, WGs, AGs, experts involved in hosting the Secretariat and/or working in European transnational HE organizations).[52] While this is not a formal network, it does not have a specific role as a unit; rather, these individuals contribute to policy making through the institutional work they do as part of their jobs. Nine of these experts were interviewed for the current research.

The different experts in the support structures of the Education Ministry have succeeded to put their organizational issues and interests on the agenda of the minister: "most of them are professionals and these types of agencies succeeded to keep good-quality people, even in times when the ministers changed and the policy making was insecure" (Ro_Uni#13). It was claimed that CNFIS, the National Council for Higher Education Financing, is one of the structures that subsisted for a considerable period (despite many ministerial changes) and was coherent in its approach of analyzing the different HE components: "the idea is that there was a continuity, their input and calculations have been considered, their procedures have been clearly established" (Ro_Uni#13). Similarly, CNATDCU, the National Council for Attesting Titles,

[51] About CIPES: https://www.cipes.pt/about-cipes?language=en

[52] The Bologna Process Experts List. Available online at: http://knobi.uefiscdi.ro/wp-content/uploads/2018/07/KnoBI_Lista-experti-Bologna_full.pdf

Diplomas and Certificates, succeeded to maintain its anti-plagiarism policies despite the fact that ministers changed (Ro_Uni#13).

Referring to the role of the Romanian QA agency, an agency representative stated that "the government as a structure needs these types of agencies. One cannot expect the government or the prime minister to know some specificities or technicalities from the higher education sector without having the support of such agencies and people, let's call them "experts, specialists" and whom are involved in such structures" (Ro_Nat#4).

According to a national level expert, UEFISCDI is the major HE actor supporting the implementation of the BP, with specific projects on various action lines: "the agency is rather an office that prepares policies in the educational sector for the ministry" (Ro_Nat#1). From a policy perspective, the agency has been permanently active in the policy- making process by running a cluster of European structural projects regarding Romanian HE sector (starting with 2008-2011), with the agency applying for project funding outside the country "in the last six years the agency has been number one in Europe in attracting funds from the European Research Area or Erasmus" (Ro_Nat#6).

Practically, UEFISCDI helped the Education Ministry in the policy making process:

> *Whether we like it or not, currently the agency is the component that brings a bit of strategic intelligence to the ministry and to the higher education sector in general. If you have a look at the ministry, indeed, you have some 50-60 people working there in the higher education unit, but nobody knows what they do. They always come to us because they do not have anywhere else to seek advice. The agency is the one structure that has proposed strategic things* (Ro_Nat#6).

One of the interviewed experts pointed out that the implementation of the BP is not always a top-down issue, but decision-makers tend to rely on research-driven recommendations within their country context rather than taking on some other countries' practices (Ro_Nat#6). The UEFISCDI compares with the Higher Education Funding Council for England in terms of bringing professionalism to higher education financing, research and analysis. An agency member points to its main contributions to national level policy changes and debates: the development of the PhD, the code of studies, starting the discussions in the third cycle, the differentiation of universities (together with the EUA), the SD and higher education internationalization (Ro_Nat#6). [53] With the input of the HEIs, the UEFISCDI created a SD framework, but given its position as a governmental agency, it cannot directly affect policy

[53]Many projects regarding the implementation of the BP have been funded through a special funding mechanism for EHEA reforms, see: https://eacea.ec.europa.eu/erasmus-plus/library/support-implementation-european-higher-education-area-ehea-reforms_en

change: “this is just a policy paper. We, since we do not come with any type of financing, we cannot push for certain issues, even if we do it just formally - it is very difficult to convince decision-makers by pressure” (Ro_Nat#7). Through the interviews it was revealed that there is no strong correlation between what the agency proposes and what a minister decides to do. Usually the agency provides the necessary data and details requested by the minister, but the political decision is in the hands of the minister of education, as one of the interviewees states: “formulation, adoption and implementation is managed just and only by the minister of education” (Ro_Nat#1).

When asked what are the main achievements of the agency, another national level expert stated that the agency established the basis for a series of HE policies that have later helped to develop full-fledged laws (including on equity, social scholarships) and proposed the introduction of equity and internationalization as criteria for the institutional development fund available for HEIs (Ro_Nat#2). Overall, it has been argued that the agency felt under pressure when governments changed (Ro_Nat#2; Ro_Nat#6) and this was mainly because the agency established itself as a strong structure in the field of HE and the ministry saw this as a competition issue. Moreover, it was stated that “there has always been some type of antipathy towards our agency, because it promoted the idea of transparency regarding state funding” (Ro_Nat#2). This made the agency collaborate with other agencies and structures rather than with the ministry, including the National Council for Higher Education Financing, the Institute for Educational Sciences, or the National Council for Statistics and Prognosis in Higher Education. One of the challenges encountered referred to the fact that the agency’s portfolio is widespread in terms of policy areas and when working on certain issues their work overlaps with somebody else’s competence (institution-wise) (Ro_Nat#2).

To conclude, different-level experts and structures contribute in providing firsthand input to top decision-makers; however, they encounter difficulties to reach the national authorities in charge of HE reforms. Individual experts have had little visible impact on national reforms. In some countries, experts were consulted or heard when important national level policy developments took place. National experts and structures can only influence policy making indirectly through those national authorities and HE organizations directly involved in the implementation of HE reforms. While in Portugal and Romania nationwide structures evidence themselves as key pillars of research and policy advice, in Moldova such a structure does not exist. As the findings show, such a structure represents a cornerstone for advancing the BP implementation at the national level.

6.1.3. Universities' Engagement in National Level Policy-Making

As revealed in the previous chapter, HEIs, through their representatives, contribute and participate both in BP (participating in the ministerial meetings, WGs, etc.) and national level policy-making processes (e.g., by directly communicating with top decision-makers, or through the Rectors' Council). With respect to the latter, several noteworthy considerations should be discussed. Firstly, structures like the Rectors' Council or equivalent structures shape HE policy by coordinating the dialogue between HEIs and government structures, but they do so within the boundaries of their common understanding and competition dynamics. Secondly, representatives of more powerful HEIs, represented in most cases by "the academic elite", have a more powerful voice in bringing issues to the decision-makers' agenda. Last but not least, in the search for resources or common institutional interests, HEIs, as strategic actors driven by competition and excellence, collaborate and make alliances with other HEIs that share their goals and make various proposals on how to address specific HE problems or aspects. The subsections below address how the different scenarios unfold at the national level.

6.1.3.1. Moldova

A representative from the Moldovan Ministry of Education agreed that the ministry cannot produce any documents with consulting the universities, and universities are encouraged to express their official opinions and positions (Md_Nat#4). The argument was that these policies and legal frameworks are designed for universities and therefore their production and design should be made in partnership with universities. Through the Moldovan Rectors' Council, each HEI can expose its own position through a common document. Alternatively, HEIs that have benefited from EU-funded projects communicate their experiences and promising practices to the Education Ministry as a result of their project activities (Md_Nat#4).

One of the representative structures in Moldova speaking on the behalf of HEIs is the Moldavian Rectors' Council. It has the formal status of an advisory body to be consulted when important decisions are to be made (Md_Nat#7). Across the years its importance in the policy-making scene varied. In the beginning, when HEIs' rectors were "personalities with a strong managerial and academic background" the rectors' voice was a common one and it had impact, whereas the new rectors cannot be compared with that generation (Md_Uni#6). When asked about the Rectors' Council role in providing input to HE policy making, a former student representative and national policy expert referred to its rather important role, depending on the nature of the policy in question. The Council was rather open to students' participation. For

example, youth and student organizations have been invited by the Council to share their stances on specific issues. Sometimes students felt they were used as tokens to show key decision-makers that students, as stakeholders in the educational process and (in)direct beneficiaries, endorse their policy proposals.

The alternative mechanism for participation is for individual rectors is to hold direct discussions with the Education Ministry or state secretaries on specific issues. Despite this, on certain issues that the different rectors agree upon there is also common advocacy work. Reflecting on the 2014 Education Law (e.g., introducing the degree cycles, HEIs' autonomy, research as a component of HEIs, etc.), the university representative (Md_Uni#3) claimed that the law was something needed ("to be aligned with all the others") and that it came from HEIs side, but its content implied hard bargaining among institutions and the Moldovan Academy of Sciences. It was mentioned that the rector of the institution she was representing was part of a working group involved in defining the content of the law. Their position was informed, on the one hand, by the experiences acquired through a project on HEIs' autonomy, and on the other hand by documenting existing legislation from Romania and Nordic countries. The adopted law provided favorable conditions for HEIs' development and modernization: "the lack of such national level documents would have been an impediment for our work" (Md_Uni#3). With regard to legislative amendments, it was added that "there is always an opportunity to contribute; it depends on the interest of the government to make those changes, to listen what HEIs propose and to accept or present an argument against what is being proposed" (Md_Uni#3).

A vice-rector claimed that rectors do not always have a common voice on certain issues, or sometimes their voice is not properly heard. The interviewee emphasized that the university she represents is rather different from the others in terms of the vision it has and the measures it embraces. Rather than using the other universities to put forward certain proposals or discuss specific policies, this institution used a one-to-one approach with the Education Ministry. This is also due to their internal dynamics and the image this structure has built for itself so far. The diverging positions within the Rectors' Council are due to the shrinking number of HEIs and student numbers, with HEIs competing for students.[54]

[54] In Moldova, one of the universities decided to provide merit-based scholarships – from its private funds – for first- year students. The Council of Rectors, which felt betrayed by this initiative of attracting students through finances, reacted to this initiative and the issue reached the agenda of the Parliamentary Commission on Science and Education.

When asked who the main actors or institutions they consult with in terms of QA policies are, the QA representative from Moldova stated that the main actors are the Education Ministry and the HEIs. As far as the latter group of actors is concerned, the QA agency consults both with the Rectors' Council – in case issues need to be discussed at the higher level – but also directly with universities' representatives through their QA structures, the vice-rectors responsible for QA or study programs (Md_Nat#2). One of the student representatives involved in the QA agency institutional evaluations mentioned that there are different types of collaborations and consultations (formal and informal) between them as evaluators and HEIs. These have been fostered by the common goal both groups of actors have, which is improving the educational offer (Md_Nat#7).

6.1.3.2. Portugal

When Portugal started formally implementing the BP, mainly through the introduction of the degree cycles, academics and HEIs reacted rather negatively to the BP and had no deeper understanding of it: "academics were afraid they will be losing their place in the university because such changes required fewer people" (Pt_Nat#4).

In Portugal, the HE policy-making process includes the voices of HE representatives. A specificity of the Portuguese policy-making system is that when passing a law on a specific HE topic, including BP-related ones, student unions or HE institutions are required to provide a written comment or input (given a clear timeline). For example, on the University of Coimbra's Group for the European Space of Higher Education website,[55] an event was prepared bringing together other university representatives from University of Porto and Aveiro with the aim of providing an opinion on the implementation of the Basic Law (Bologna Process) in the areas of the Humanities and Sciences, as requested by the Minister of Science and Higher Education (DGES).

In Portugal, prior to the BP, legislation from 1994 (Law 38/1994) targeted the basis of a national system for assessing HEIs. The Council of Rectors of Portuguese Universities (CRUP) played an important role in promoting QA laws at the national level even prior to the BP. One of the interviewees revealed that CRUP had a strong influence. At that time, rectors were in their positions for a long time, they were very united and therefore able to influence policies mainly through proposals (Pt_Nat#3). It was mentioned here that with regard to the QA system, rectors started discussing it even without any prior national legislation. The rectors

[55] University of Coimbra, Group for the European Space for Higher Education: https://www.uc.pt/en/ge3s

built on existing QA systems in Europe, more specifically on the Dutch system, which had a QA system owned by a national organization linked with the Dutch universities. Similarly, the law on university autonomy allowed CRUP to form the Foundation of Portuguese Universities, which facilitated public universities making use of the QA system. In 1998, through Decree-Law 205/98, the National Council for the Evaluation of Higher Education (CNAVES) was created as the main structure to "assist and assure the credibility of the process of higher education, and to review and report on the quality assurance procedures" (OECD, 2006, p. 85).

The QA agency in Portugal was receptive to HEIs' inputs with regards to the ESGs. As mentioned, with the changes at the BP level, the national agency followed the line and adjusted its internal rules to be in line with the changes proposed by the ESGs. HEIs were willing to collaborate on this because on the one hand, they understood that "they are interesting", and on the other hand, the QA agency listens to the universities (Pt_Nat#1).

One of the student services officers mentioned that since 2017, a new governmental decision instituted a scholarship (covering tuition fee regardless of their income) for students with disabilities. This was driven by one of the leftist governments, which created a consultative process, a working group including universities' representatives working on access matters related to students with disabilities and students with special needs, with the aim of informing future policy-making: "we studied the law, we studied the accessibility conditions, the transition between lower levels of education and higher education institutions, the condition these people, how they study, what policies existed within higher education institutions for these people, how many students were enrolled in higher education institutions" (Pt_Uni#1). The working group developed around 67 recommendations that were presented to the Government, which put the basis of the above-mentioned scholarship proposal.

The above working group was building on an existing informal network established in 1997 that included representatives from a variety of universities, which created a community of practice among disability offices or some kind of support for students with special needs looking for solutions and resources with regard to special needs education. Through the interviews, it was revealed that the members of this group were of the opinion that there was a need for a national approach with regard to inclusion in HE: "We work to raise awareness, to discuss subjects that are important at the moment related to the inclusion of students with special needs, to reveal the existing study conditions and push forward some kind of national policy" (Pt_Uni#1). The group considered it unfair to students with disabilities, for example, that they should have to choose their university based on the study conditions offered and not on the program offered and their specialization preferences (Pt_Uni#1).

6.1.3.3. Romania

Most of the time, politicians, top decision makers at the national level, and other types of formal political-administrative institutions and state agencies with a certain competence in HE policy have the lead role in initiating policy change and setting the policy-making agenda at the national level. The Romanian Council of Rectors (CNR) has been perceived by some national experts as a structure that does not make the most of its position in its relationship with the Education Ministry (Ro_Nat#6); other HE professionals consider the Council as one of the key structures contributing to the future direction of HE (Ro_Nat#1).

Almost a decade ago, five of the top universities in Romania established the Consortium Universitaria. One of its main aims is to debate and open country-wide discussions on pressing issues in the Romanian HE sector, as well as to contribute to enhancing Romania's recognition with regards to research and teaching internationally. The group presents itself as a contributor to the modernization and improvement of the national legislative frameworks so they can allow for further alignment with European and international trends (e.g., requesting decision-makers to support the inclusion of Romanian HEIs in the EUA's statistical analyses, HE financing in line with international rankings' standards, etc.)[56]. So far, the Consortium has proved to be a successful actor in the HE policy-making scene (e.g., it asked for the resignation of the Education Minister in 2018, it challenged the distribution of state-budgeted places across the HEIs, etc.).

In Romania, the building of a SD strategy, as stated in the Yerevan Communiqué (2015), arose as a bottom-up approach tried by HEIs and the UEFISCDI. Through the "Internationalization, equity and university management for quality higher education" (IEMU) project co-financed by the EC, the UEFISCDI engaged in a grassroots exercise with the aim of developing a SD strategy:

> *This project was developed within a social program and obviously aimed to provide some guidance considering the lack of strategic approach in the field of equity and participation. In other words, the Romanian state had different policies, but they were not connected by a logical thread. Through this project, we aimed to have an overall view of what is happening in the field. We have worked with a lot of experts and received various inputs from several institutions* (Ro_Nat#2).

This strategic framework was among the first initiatives aimed exclusively at improving equity. The project produced expertise and evidence-based research on the current situation of the

[56] For a summary of one of the Consortium Universitaria's 2019 meetings, see: http://www.uaic.ro/consortiul-universitaria-viitorul-invatamantului-superior-romanesc-de-calitate/

SD in Romania, which resulted in a strategic framework aimed at increasing the capacity of the central decision-making institutions to create more policies in this area and to promote certain aspects on the public agenda.

When asked about the intentions behind this policy process, one of the actors involved in this project contended that their decision was not to repeat "the top-down approaches that have no bottom-up content", and, therefore, they decided to continuously invest in bottom-up approaches at the institutional level (Ro_Nat#6). The idea was that by doing so, major courses of action could be consolidated in order to later justify a top-down approach[57]:

> *The social dimension is interesting from a narrative point of view, but not attractive enough. We have tried to look at and work with the universities to define their approach, their strategy related to access and equity. What this project has shown is that universities are prepared to make a critical mass out of this topic. When it comes to access and equity, not even the language was as it should be. This is sad… We almost needed a dictionary to make them understand what we meant. For this reason, we decided that the social dimension is not a mature topic…(*Ro_Nat#6).

What this project experience shows is that universities have a rather narrow understanding of the SD, and at the same time, there are no incentives for universities to be proactive regarding the SD by developing an institutional strategy (Matei and Curaj, 2014) nor by developing national level frameworks.[58]

To sum up, in the three countries under consideration, HEIs have paved different ways to reach out to national level decision-makers. Firstly, all three countries made use of their Council of Rectors, a structure which, over time, experienced declining status and power in HE policy making in all three countries. While this structure can speak with a common voice when policy proposals or issues affect HEIs in the same measure, the race for competition and resources drives rectors to find alternative ways to push forward their policy proposals. In Moldova, HEIs, especially the more prestigious ones, are in direct contact with HE policy

[57] The actors in this project have also reflected on the parallel processes they have been involved in with regard to the development of an internationalization strategy. In this case, they have had field visits and have worked with around 24 universities so that each of them could come up with its own internationalization strategy. In the second stage, they came to the ministry with a proposal for a strategic framework.

[58] Comparing the Romanian experience with the Austrian case of building a SD strategy, several considerations should be noted. Interviewed about their role in the strategy formation process, one of the representatives of the Austrian Agency for Quality Assurance (AQA) claimed that the building of the SD strategy had been fostered by the Education Ministry as top-down process, yet one involving all the relevant stakeholders, including universities, students and different sectors of the education system. The Austrian Students' Union representative – a strong advocate for such a strategy – was not fully convinced the Government wholeheartedly believed in the idea of the strategy, but rather believed "it is something nice to have" (Europe#3). Reflecting on the strategy formation process, the students appreciated the thorough process behind it and felt like equal partners in the policy-making process. The disappointment was that "the piece of paper that came out of this process did not really reflect what was done in the working groups" (Europe#3).

makers and feed in proposals based on their experiences acquired through different projects. The extent to which these inquiries are taken further is an issue that requires governmental attention and cannot be dealt with just at the ministry level. In Portugal, national legislation ensures HEIs' voice is heard. Moreover, depending on the issue, HEIs are consulted and treated as partners in the policy-making process through the formation of different working groups. In Romania, universities' coalitions have become a more effective tool to discuss, debate and lobby national governments.

6.1.4. Students' Input

In 2001, with the occasion of the Prague ministerial meeting, students' participation in BP governance structures became more formalized, and the perspectives of students as learners and future graduates was something not to be ignored. The issue of student participation and representation involves a variety of relationship constellations ranging from the lower to the national and international levels: at the university level, students can form different forms of association at the department or faculty level, then come together in university, regional and national level structures. Depending on these levels of representation, student delegates and representatives engage in different relationships: students-students, academics-students, university-students, and state-students (Klemenčič, 2012).

In most BP countries, these rapports are formalized through different regulations or administrative acts. For example, for the specific case of QA within the BP, student participation is explicitly mentioned not just for the evaluation of QA agencies, but also of programs. In general, student representatives' relationship with the Government and the HE policy-making field is a sensitive issue (Klemenčič, 2011). Unpopular HE reforms, such as increased tuition or financial matters jeopardizing student welfare, etc., make students resist and oppose such changes. Alternatively, students are likely to support the national policies that are aligned with their preferences.

6.1.4.1. Moldova

The level of student representation in Moldova was formally institutionalized in the early 2000s, when HEIs allocated specific quotas for student participation. A recent study states that Moldovan students have been marginally involved in decision-making processes at the institutional level and students' structures have a low level of institutional development and capacity, all of these influencing negatively their representation at the national level (Loghin, 2019). This has been reconfirmed by one of the interviewees stating that with regard to

students' representation, on a scale of 1 to 10, Moldova is at 1: "there is no clear understanding as to what the role of student representation structures is, neither at the administrative level, nor in relation to professors" (Md_Nat#3).

With regard to students' involvement in QA work, the QA agency representative stated that due to the politicization of student organizations, the QA agency started recruiting students from university-level structures. Usually they provide training for around 10-30 students for one or two weeks, followed by testing of the students' understanding and knowledge. Those who are competent and feel the task is suitable for them stay and receive financial compensation for their work (Md_Nat#2).

A national level youth representative stated that the social dimension issues encountered most frequently in Moldova refer to student accommodation, inclusion in the HE system, and the infrastructure of the learning environment, which discourages students with disabilities from accessing HE (Md_Nat#7). In this sense, it was claimed, student organizations should build alliances among themselves.

As mentioned, student alliances in Moldova were not included in policy-making processes initiated by the Ministry of Education. In contrast, another informant referred to his direct participation, as a representative of the National Council of Student Organizations (CNOSM), on a council of the Ministry of Youth and Sports Council, also reported as being more open to collaborate with youth and student representatives (Md_Nat#7; Md_Uni#2), on the drafting of the youth law through which youth managed to achieve a fairly consistent number of free or discounted passes for urban public transport for students; with regard to student accommodation in the dormitory, they achieved improvements to the living conditions and contributed to room distributions - based on a very clear methodology- for about half of the member institutions in the organization (Md_Uni#2). Here we must acknowledge the quality expertise of the National Council of Youth Moldova - CNTM, which has been an active HE actor (Md_Uni#2), especially within the Parliamentary Commission on Education, where they contributed specific amendments, written input, and/or supporting documents. The Council has also been contributing to the Code of Education, supporting the 20% student representation quota (Md_Nat#7).

6.1.4.2. Portugal

In Portugal, student representation is multilayered: first students assemble at the faculty level (*núcleo acadêmico*) and the university level. Then they gather around four times a year in their regional level associations (e.g., from Lisbon, Porto, Coimbra, Algarve, Madeira, etc.),

all of which then meet in ENDA, the national level assembly of students, with the aim of putting together demands for the Government. At the university level, student associations tend to complement students' skills by offering additional courses, seminars, and training in issues students consider beneficial for their personal and professional development (e.g., how to complete job applications or do event management). A national level HE expert contended that in general, students are more vocal within their universities through the formal role they have in the senate or other structures, but students are "getting compromised by the system, they can make noise inside but not outside" (Pt_Nat#3).

When in ENDA, individual regional level student representation structures speak with one voice (regional level structures have around 30-40 association members) and agree on the points for which they would like to gain support (Pt_Uni#7). A student representative at the faculty level mentioned that one of his initiatives of informing the government about the learning infrastructure in some universities – some university buildings require reconditioning – have been supported by regional and national level student organizations and were sent to the minister in charge: "I am not sure if the minister read it, or if it went directly into the trash, but it was taken [there]" (Pt_Uni#2). Similarly, regional student federations, through their presidents, directly address the Education Ministry on different issues. For example, one of the student representatives referred to the freezing of different student passes (Pt_Uni#7).

The main topics discussed in ENDA relate to scholarships, accommodation, student services, and HE financing. According to the student, these representatives are the most legitimate for bringing different issues to the agenda because "they know the reality" and they are the ones that make sure that those themes are not forgotten by the Government (Pt_Nat#2). One student representative mentioned that across time, different student organizations have been advocating for free HE despite the well-known fact that this will not happen: "we cannot afford to do this, how we will pay our teachers? It is not our job to say how to do this, it is our job to demand it. For example, those students advocating for free student accommodation said that the government should pay for that, it's hopeless..." (Pt_Uni#7). A national level student representative pointed out the student associations' work focuses on creating a culture of inclusion within academia: "We wanted to bring diversity to the table, and we try to make sessions, workshops and debates about gender, race and refugees... about all of those subjects that exist, even if in a low percentage. We try to create a dialogue so that people will be more inclusive (Pt_Nat#2). Besides this, regional level student structures aim to foster students' civic

engagement through different activities (e.g., replanting forests, art exhibitions about youth-specific issues) and engage their members in campaigns about broader social issues.

Through the interviews it became clear that the purpose of ENDA is to define the position of the students on various HE issues, to plan with all the associations in the country, and to put forward a coordinated, strategic approach on HE policies (Pt_Nat#5). A recurrent theme across the student representatives was the politicization of student structures across the country. Overall, it was revealed that ENDA *per se* is a great tool, but its effectiveness is questioned: "I believe the Government doesn't care very much what comes from there, and I believe changes happen mostly because of the contacts people from ENDA and other academic groups have with the government, you really have to do this" (Pt_Nat#2). When asked how much input university level associations have in ENDA and national level policy-making processes, and to what extent this has been taken forward, the interviewee stated that this "depends because it is very much related to politics" (Pt_Nat#5). In other words, it is very much dependent on whom students have to lobby. Presidents of student associations and national level federations are usually affiliated with political parties, and when meetings between student representatives and government representatives take place, it depends very much on the political colour of the government. In contrast to this, depending on the issue of concern, students have university leaders as their main allies (e.g., HE financing). Another national student representative strengthened this point by saying

> *I think is quite political; even if you don't clearly say it, you always have a party or ideology. It is clear that our student president and our Government do not share the same ideology. The president is the one who has a lot of influence in these matters. I agree with being really loud and independent, you always have to take a stand for what you want, regardless of politics* (Pt_Nat#2).

The same representative felt rather frustrated with the way the DGES treats students. Despite the fact that students write different position papers on different topics that, are taken to the government the "Minister of Higher Education is not taking care [of students' appeals], forgets that we exist" (Pt_Nat#2). In such situations, students are persistent and push forward by making phone calls, asking for meetings with different alternatives. The student pointed out that they do not just work with the DGES, but also with other members of the Government and political parties "[on the scholarship issue] we will have a high-level meeting with all of the parties, they want to receive us and they want to see the type of cause we are aiming at, if they can help... that conversation exists" (Pt_Nat#2).

6.1.4.3. Romania

In the last few years, several national level student federations or umbrella organizations in Romania have been active in representing students' interests: ANOSR – the National Alliance of Student Organizations in Romania, USR – the Union of Romanian Students, and UNSR - the National Union of Romanian Students. ANOSR (a network of around 20 university centers and 95 member organizations) has developed quite a strong capacity in the last decade, especially due to the capacity work done by the ESU,[59] and the leaders of such organizations come up with evidence-based research and strong arguments when discussing with decision-makers. A former national level student representative stated that the ESU have made a great contribution to the work of ANOSR:

> *ANOSR created a Bologna Process guide based on the information received from ESU, and Mihail Hărdău - the Minister of Education in Tariceanu's government (November 2005 - April 2007) - was carrying this guide in his bag. As a student federation with limited resources, we were organizing the Bologna Week in universities, organized the Bologna Professor Gala, held debates in universities (on internationalization, quality assurance, social dimension), we were publishing things…* (Ro_Nat#8).

According to Wulz, Gasteiger and Ruland (2018), in Romania, the students' union (ANOSR) began to campaign more intensively for SD issues starting in 2016, when they demanded appropriate public funding, and other goals for HE development, i.e., basic funding for scholarships, investment funds in HE, subsidy for transport or canteens, student counselling, etc. As a result, the student scholarship fund increased by 142 % between January and March 2017 and the students benefited from free train transportation throughout the year. A former Education Minister points out that ANOSR is a quite vocal, visible organization, one of the most legitimate and representative speaking on behalf of students: "they work - in the sense that they produce things. Through ANOSR important things became educational policies. They work, they produce important options, really interesting ones" (Ro_Nat#6).

While the national level representatives support their constituencies in addressing university level issues (e.g., specific financing indicators for engineering programs), one of the major issues identified within the work of the organization relates to its immediate legitimacy and the extent to which it represents the diversity of the student body and their interests, as well

[59] Interviews have been conducted with members of the Union of Romanian Students, and no similar mechanism has been identified in promoting the BP policies, however, they were also advocating for similar SD policies, but their organizational capacity and resources were limited.

as whether their political positions in relation to national level decision-makers are the ones proposed by their constituents.

> *When it comes to position papers or documents, strategies and what is next to decide as our priorities, we do this through the general assembly meetings. Unfortunately, there are very few proposals from their side [members] that we should address at the national level. Most of the time students come to us if they have problems with accommodation, with food, with scholarships, and we try to address their issues, but they do not come with major initiatives* (Ro_Nat#7).

The alternative argument for this phenomenon would be that through their elected positions, student representatives at the national level are believed to have a more comprehensive view of student issues and are entrusted to take further issues they consider necessary for the improvement of the educational process.

One of the students representing ANOSR stated that during her presidency, ANOSR focused a lot on negotiating and pressuring decision makers to adopt the Code of Student Rights and Responsibilities (see Ministerial Order 3666/2012 proposing a series of measures favoring students, including discrimination legislation, scholarships, access to services, etc.) (Ro_Nat#3). Similarly, another national student representative from ANOSR referred to the 2017 ministerial order regulating scholarships (including, among other matters, the right of students from Moldova to benefit the same scholarship package) has been conceived and drafted by ANOSR (Ro_Nat#7). It has been an important stakeholder on legislative matters overall. However,

> *with regard to the extent these policies are taken into consideration, it depends a lot on the stake in the political game. If there are no strings attached then you have a freeway, things go smooth otherwise, there is a bumpy road: it takes long, there are a lot of negotiations, many actors involved, different pressure instruments. When it comes about issues related to students, we were neutral, because these types of issues do not disturb, e.g., the way in which the social scholarships are distributed does not affect the professors. They are not bothering with these, moreover, they are happy for each position of the students in this respect* (Ro_Nat#3).

Some of the structural SD measures in Romania have been adopted due to the advocacy and lobbying work of the national student organizations. Through them, important changes have occurred, such as better housing conditions, free train transportation, increases in social scholarships, etc. A former president of ANOSR claimed that they have started to approach the social dimension from a financing perspective. They want to support services for students at the national level, including the amount of scholarships. Another area on which they work is student accommodation and canteens, and here they succeeded to get a 12% state subsidy increase. Moreover, the representative added that they also focus on access to education and

"we decided to focus on the post-admission aspect - more specifically, on the orientation and counseling offices. In Romania, in this respect, we have quite a basis because there is a network of this type of centers across the country and you're focusing on ensuring that they increase their visibility to different projects and programs" (Ro_Nat#7).

To sum up, the formalization of students' participation in BP governance structures and in national and institutional level structures has allowed students to take a proactive role in defending their rights and supporting national level policy makers. Moldovan students have been marginally involved in decision-making processes and students' structures have a low level of institutional development and capacity; all this, together with politicization, has negatively influenced their representation at the national level. In Portugal, the layering of student representation makes the national level assembly the only representative structure to have talks with the Government. Alternatively, regional and institutional student representatives, depending on their support, can reach out to decision-makers and communicate their position on specific issues. The difference between these three countries and the role of students' representation and participation in policy making consists of the fact that only the Romanian student union speaks the language of the BP when discussing with governmental representatives. This can be attributed to their ESU membership and its capacity building and advocacy work with members.

6.2. Organizational Socialization Processes

Since at the administrative level governmental agencies and bodies (with competences in HE) and the academic community participate in a series of (organizational) socialization processes, this chapter hypothesizes that the support from the HE community and their interactions with the wider BP community across the EHEA affects the choice of specific policy instruments and implementation mechanisms. The main argument here is that the transposition of HE policies is a result of cross-country, cross-HEIs' international comparisons, which are used as tools for reflection to promote similar national policies.

Drawing on the existing literature on policy instrumentation, this section aims to shed light on the policy instruments and tools available to participating countries and their implications for implementation (Schneider and Ingram, 1990; Lascoumes and Le Gales, 2007). A policy instrument is both a technical and a social tool that organizes specific social relations between the governing and the governed, and it produces a specific effect which structures public policy (Lascoumes and Le Gales, 2007). It is often assumed that policy actors will take policy-relevant action if they are influenced, encouraged, or coerced to do so.

Schneider and Ingram (1990) refer to those tools which "provide information, training, education, and resources to enable individuals, groups, or agencies to make decisions or carry out activities" (p. 517). Learning tools provide the basis upon which actors are encouraged to act under unknown or uncertain conditions depending on their context (Schneider and Ingram, 1990).

Within the BP, these tools are reflected through several elements. First, there are trainings on different aspects of the BP, which bring together the responsible actors for implementing those elements.[60] Through the communiqués and declarations produced by the ministers, BP participating countries are encouraged to develop "additional working methods, such as peer learning, study visits and other information sharing activities", to learn from each other (Budapest-Vienna Declaration, 2010) or "to disseminate examples of best practice and to design scenarios for mutual acceptance of evaluation and accreditation/certification mechanisms" (Prague Communiqué, 2001). Moreover, BP actors and stakeholders provide plenty of opportunities for the participating countries to learn from each other and exchange practices and ideas with the aim of encouraging implementation and shared practices.[61] Such practices of peer learning, trainings, seminars, forums and other such tools create the possibility not just to promote best experiences, obstacles and challenges in implementation, but also to create a space for dialogue among different stakeholders. An indicator of whether these socialization practices matter is whether actors, participants and representatives refer to them when justifying policy decisions and their specificities at the national and institutional level.[62]

6.2.1. Moldova

As mentioned above, in Moldova the QA developments in line with the BP were rather slow and began through EU-supported capacity building projects targeting the Moldovan HE system (especially TEMPUS), which later (incrementally) became formalized at the national

[60] Such an example is the ENQA Agency Reviews: Training of Reviewers. Organized by ENQA together with the Slovenian Quality Assurance Agency for Higher Education (SQAA) the training sessions provided quality assurance reviewers with the necessary knowledge and guidance on the use of the Standards and guidelines for quality assurance in the European Higher Education Area (ESG 2015), on the ENQA Agency Review process, and on compliance assessment. ENQA Agency Reviews: Training of Reviewers: http://enqa.eu/index.php/enqa-agency-reviews-training-of-reviewers/

[61] One such example is the development of Peer Learning for the Social Dimension (PL4SD), a three-year project funded by the European Commission, which aims to provide policy makers and practitioners with the relevant resources in order to develop effective measures for ensuring the social dimension of the EHEA. Through this project it is expected to: "stimulate international exchange and debate on policy measures; enable peer learning and ease the implementation of policy measures by other countries, higher education institutions and students' organizations; structure the information and collect relevant reports and research on the policies at national levels, providing a solid basis for further research". Peer Learning for the Social Dimension: https://www.esu-online.org/wp-content/uploads/2016/07/PL4SD_final_project_report.pdf

[62] Due to the lack of data, Portugal has been left out of the analysis.

level. One of the QA representatives from Moldova referred to the period prior to the establishment of the current QA agency (Md_Nat#2). It was revealed that in 2014, when the preparations for creating an agency started, there was an interim council – as one of the interviewees revealed, none of its members was a Moldovan citizen (Md_Uni#2) – in charge of creating the legislative framework for the functioning of the QA agency. During this period, the council made the most of its partnerships and bilateral agreements with QA agencies from Iceland, Romania, Russia, Kazakhstan and other post-Soviet countries; they felt they could learn from and transfer some of their experiences. Meanwhile, this council "took advantage" of several projects (e.g., funded through Erasmus, TEMPUS, in partnership with the German QA agency, or through the Estonian Foreign Ministry) including a project supported by ENQA. Similarly, a staff member working in the QA department in one of the universities under consideration attributes the creation of the QA agency to following up a Tempus QA project (Md_Uni#6). All these projects contributed to an exchange of information, procedures, methodologies, QA philosophies, etc., all of which contributed to establishing the basis for the Moldovan QA agency project (Md_Nat#2).

As mentioned above, by funding different types of projects, stakeholders achieve a greater understanding of solutions to a certain problem in the HE sector. This specific case illustrates how projects inform policy making. Policy change occurs through continuous work on certain issues, and projects (most of them short term and small scale with low financial risks) provide a vehicle for experimentation which might be later adopted as policy initiatives (Goumans and Springett, 1997).

When it comes to students' role and involvement in the QA agency structures and their external evaluations, the QA agency representative claimed that they were trying to involve student organizations and follow a similar approach as in Romania and other European countries. The motivation was driven mainly by the assumption that student organizations, because of Moldova's collaboration with the ESU, would be much more prepared for such positions. Despite these expectations, the QA representative claimed that the level of politicization of the student unions made the agency reconsider its approach to student participation. The situation can be interpreted as an experiment in incorporating promising practices which did not work, given the local context.

A former student representative at the national level from Moldova pointed out that before 2013, student organizations were focusing on different sociocultural activities rather than on the academic and student representation component (Md_Nat#1). At that time, a seminar, organized by one of the Romanian student unions and the ESU, took place in Moldova

focusing on students' (self-)representation. One year later, one of the participants in the seminar became the president of the National Students' Alliance and started to implement and restructure the organization based on the insights received. It followed that the organization became an umbrella structure focusing on national level student representation. In the following years the ESU has made several visits to and evaluations of the Alliance and, as a result, it became a full ESU member (Md_Nat#1). When asked where the motivation to get aligned with the ESU standards and practices came from, the student representative stated: "I could see, in countries like Romania and other European countries, how powerful student organizations are and I was wondering whether it will be possible to empower students and make them more active" (Md_Nat#1). The interviewee also mentioned that HE stakeholders agreed that such a recognized structure would be very much welcomed (Md_Nat#1).

6.2.2. Romania

A national level HE expert from Romania mentioned that the fact that QA is more structured as a policy area is partly due to the fact that it is a so-called transparency tool (having an information-provision function) and is a more regulated policy area: "you also have professional organizations in this area, you also have organizations which actively promote peer learning: you have all the ingredients to have a quality assurance system in your country. However, you can have all the ingredients, but this does not mean that you know how to combine them to do your job properly and to have the expected result" (Ro_Nat#2).

A former QA representative from Romania referred to the fact that Romania was quite an active actor at the European level. It organized several international workshops in Romania and also attended events and meetings; several Romanian experts have been members in European QA structures such as the ENQA board or in the contestation commission of ENQA (Ro_Uni#1; Ro_Nat#5). At the regional level, several experts' exchanges took place and some cooperation contracts were developed between the Romanian QA agency and similar agencies from Bulgaria and Moldova. Lately these practices have become more rare, and if international events take place on QA matters, very few of them are attended by QA representatives; most of the time the top management of ARACIS or members of the Council have been present at these events (Ro_Nat#5).

Student unions have been heavily inspired by the work of the ESU. A former student representative at the national level pointed out that starting in 2005, membership in the ESU generated a new type of discourse about BP in the Romanian student organization:

> *the federation has imported from the ESU all the practices and content - and this was reflected in the priorities of the organization. Most of these concepts and approaches have been translated into laws later on.. We have imported from the ESU because we were in a transition period from all possible points of view. Even before ANOSR there was a series of researchers and experts who were aware that there is a need for these types of approaches* (Ro_Nat#3).

The Romanian national level student representatives saw the ESU as an opportunity to bring European trends and practices to Romania; students associated it with "modern higher education, openness towards the West, new teaching technologies, quality, student rights, with all we considered beneficial for higher education. Whereas, we associated the Soviet legacy with corruption, etc." (Ro_Uni#15).

To conclude, HE policy is completely in the hands of the participating countries; however, the BP provides many opportunities for peer learning, trainings, seminars, forums and other such tools that create the possibility not just to promote best experiences, obstacles and challenges in implementation, but also to create a space for dialogue among the different stakeholders. It can be claimed that ideas about the BP and its promoted policies reach the decision-makers' agenda in different ways, including through different interest groups, policy experts and policy entrepreneurs. The existing transnational communication channels are crucial channels for policy learning, exchange, and diffusion of best practices (both organizationally and content-wise). In the BP case, transnational structures like EUA, ENQA and ESU and other participating countries and HEIs have proven to be influential in the propagation of specific policy measures in the field of QA and SD.

6.3. Implementing Organizations' Decision-Making Authority and Capacity

Considering the character and complexity of the policy to be transposed, the in-charge agency and its politico-administrative context, this chapter also hypothesizes that the decision-making authority, and the discretion and capacity of the implementing organization(s) affects the transposition phase and further implementation of the policy. In the absence of a regional or national level structure dealing with SD related aspects in the three countries under consideration, this section focuses on the role of QA agencies' and actors' perceptions about their capacity, authority and national level input.

6.3.1. Moldova

In Moldova, both student representatives and universities were critical towards the agency. Due to the fact that the Moldavian QA agency has relatively little experience in QA matters, it was mentioned that the experts whom it works with are not properly trained and do

not have the necessary skills to take part in evaluations. They perform administrative roles within universities and cannot grasp the QA procedures as a uniform, coherent set of processes: "the experts who come to do evaluations just see just segments of the didactic process and do not have a comprehensive view of the closing of the quality circle" (Md_Uni#6). It was also was specified that the QA evaluators put more emphasis on the existence of university level documents related to QA: "it is a bureaucratized process, and as long as the agency does not consider QA as a process through which universities' policies are applied in practice, QA will remain a verification exercise rather than quality evaluation" (Md_Uni#6).

A former student level representative stated that he himself, as a student evaluator with the QA agency, had been excluded from the commission's meeting despite completing his part of the work (Md_Nat#7). The positive side of his involvement related to the QA agency's campaign about students' involvement in QA: "we went in the big university cities and held round table discussions with students. Staff from the agency would come and talk about different types of quality evaluations" (Md_Nat#7). When asked whether the QA contributed to the QA policy development of HEIs, it was claimed that from a students' perspective, the QA agency imposed certain standards, especially with regard to students' participation in university governance structures (Md_Nat#7). From an academic perspective, the QA agency was "rather reluctant to step in. The Ministry was expecting it will hit hard universities and the weak universities or programs will be closed" (Md_Nat#7).

National student representatives were quite critical towards the Moldovan QA agency, especially because of their decision to change the regulations regarding students' participation (Md_Nat#7). According to the student representative, the QA agency consulted with student representatives and agreed that that student evaluators and board members should be part of a national level umbrella organization, however the QA agency changed their functioning regulation (later approved by the Government) removing this provision and it is enough for student delegates to have a student status (Md_Nat#1). The second criticism relates to students' training for QA evaluations. In countries like Romania or Poland, student umbrella organizations are involved in students' training; in Moldova, the QA agency provides this training by itself: "ANACIP will teach students to evaluate the technical-academic component; students should train their peers to evaluate from a student perspective" (Md_Nat#1).

6.3.2. Portugal

The QA agency established in 2006 in Portugal, A3ES - Agency for Evaluation and Accreditation of Higher Education, is a private foundation with a board of trustees of six people

appointed by the government after consulting with HEIs, and those six people appointed the council of administration for a period of four years. It is an independent structure from the Government: "The QA agency's decision is final, there is no way the Government can interfere with its decisions. If an institution does not agree with the final decision, they cannot appeal to the ministry, they can take the agency to the administrative court" (Pt_Nat#3).

When asked how much input the QA agency has with regard to QA policies at the national level, the QA representative stated that the Education Ministry does not interfere, and on top of that, there is a law which refers to the fact that the general guidelines for quality must follow the BP process and its rules; as a consequence, the QA agency acts on its own initiative and adapts accordingly: "the agency has capacity to define how the system works, so we can define the guidelines of our own external committee work and so on. So, we have a certain level of autonomy and in no way the ministry will interfere with our decisions" (Pt_Nat#3). It was further added that the QA agency has closed more than 2,000 programs and about 14-15 institutions, differentiated more clearly the university and the polytechnic sector, "and for the minister it was good, because he was saying 'It's not me, it's the Agency'" (Pt_Nat#3). To summarize, in Portugal national legislation allows the agency to set rules to further implement the BP; when the BP changes, the QA agency adjusts its rules to adapt to the BP standards and guidelines.

Generally speaking, the Portuguese QA agency has been praised for its work. A representative of the rectors' council and university staff stated that the QA agency, through its evaluations of all study levels and its procedures, has made professors aware of their study plans and provided a comprehensive view of the curriculum and their area of teaching (Pt_Nat#4). It was also stated that because of the evaluation process, professors became more concerned about what they teach and how, because they knew their peers will evaluate their work and question them at some point (Pt_Nat#4). The representative of a university level QA structure assessed the work of the QA agency as she experienced it through her participation as an evaluator:

> *I think the agency is doing a good job. I have analyzed the QA processes of different degree programs and some of them had many problems, and sometimes they were not approved; for other programs we suggested the relevant changes. I think higher educational institutions became more aware of the things they should care about* (Pt_Uni#4).

Similarly, students have had good experiences with the agency. One student representative reflected upon her participation being interviewed in one of the program evaluations. As a follow-up to that evaluation, the student noticed an improvement in one of

the courses discussed during the evaluation (Pt_Nat#5). With regard to student evaluators, it was stated that the university level student associations nominate the students participating and the rector needs to approve the nomination.

A staff member representing one of the student services stated that one of the limitations of the QA agency is that it does not include social inclusion criteria in its evaluations (Pt_Uni#1). The argument presented referred to the fact that when designing quality learning opportunities, one should consider the prospects the system has to offer for a variety of students. Rather than claiming that students with disabilities or different impairments do not represent a high number among the student body, the system should be designed in a more inclusive way so as to attract such students and pressure universities to act (Pt_Uni#1).

6.3.3. Romania

ARACIS, through its status, can propose methodologies in line with the BP. One of the former QA representatives stated that for several years ARACIS had been lacking several crucial aspects in its work such as follow-up procedures; there have been no new methodologies (as of 2017) despite the fact that there was legislation permitting the introduction of the 2015 ESGs (Ro_Uni#1; Ro_Nat#5). It was further elaborated that "the agency is responsible for the situation because it was comfortable with a situation that works" (Ro_Nat#5). Similarly, the interviewee pointed not just to the responsibility of the Education Ministry as the main body responsible for public accountability, but also to the HEIs which "do not insist on their rights. They do some processes just because they have to, because the law says to, but if you ask them about the added value of these policies, they will tell you that they do not appreciate it because it involves bureaucracy" (Ro_Nat#5).

The situation at the QA agency level has varied across time. ARACIS changed the behavior of HEIs with regards to QA policies, in the sense that institutions were aware that once in a while somebody would come and evaluate their work, or there was the idea that "I have to be evaluated, it will happen to me" (Ro_Uni#1). In 2012, a group of HE professionals established the basis of a set of standards for the QA system which led to the closure of some universities.

Currently, the obstacles with ARACIS relate to a lack of interest among the top decision-makers within the agency: "they are not there because they would like to change things but because it is good and beautiful to be there." As for their knowledge of the ESGs "of the 21 council members, 2% of them have read the ESGs" (Ro_Nat#5). A representative of the QA council referred to the fact that the QA agency is highly politicized in the sense that,

depending on certain people's interests, there are "friendly evaluation commissions" – if the program to be evaluated has some connections with the members of the QA agency, then the QA agency sends a "friendly" commission, otherwise they will send the "tough ones and they will manage" (Ro_Nat#8). Additionally, it was claimed that the council itself is so "rotten" (Ro_Nat#8) that the only way to make it work properly is to start from scratch: "we had elections; I had hope, but the same people were elected. The motivation of the council members is purely financial…The ENQA evaluation would be my last hope. I hope they will have many recommendations" (Ro_Nat#8).

Other HE experts have also complained about QA performance. On the one hand, it was claimed that the agency is focusing more on performing evaluations and getting its money instead of contributing to enhancing quality in the Romanian HE system. The evaluations of programs are led by financial interests, rather the interest-driven purpose of building a common understanding and sense-making within HEIs (Ro_Nat#6). On the other hand, the agency is highly politicized: "it is an independent institution, but most appointments have been done in a political way" (Ro_Nat#6). It was further claimed that the technical staff is not encouraged to be more engaged in QA activities, whereas experts do their job very differently: "some are quite serious, others not" (Ro_Nat#5).

"Despite the fact that officially we were fine, on new standards we have nothing (two or three years later)" claimed a national level HE expert (Ro_Nat#2). In addition, it was stated that Romania is not on the right track when it comes to QA developments and there are serious issues with student representation (Ro_Nat#2). As far as the first aspect is concerned, it was claimed that the evaluation process became a "checking boxes" process, with HEIs "beautifying everything when ARACIS comes" (Ro_Nat#2).

A former student union representative states that the inclusion of experts in the QA agency is something positive as a governance principle, but the QA experts "are not really experts and have a rather outdated vision with regard to the QA system" (Ro_Nat#7). A member of the QA agency expert pool indicated that in general within the QA agency there is a lack of human resources. As far as the experts are concerned, the selection procedure is not that rigorous, and the experts' evolution is not constantly monitored; there is a lack of continuous professional development and training: "last year around 100-200 people were brought into one room and trained for a few days " (Ro_Nat#7). With regard to the selection process, professors submit an online application form and students are selected by the national student unions and federations. Usually student unions, especially ANOSR, together with agency representatives, organize a one- week training: "students get trained in what the BP is

about, what are the ESGs, how the HE system is organized, etc. I think we put in a lot of effort to make sure they know what is expected of them. On the last two days we have simulation games on how they would evaluate a university" (Ro_Nat#7).

The QA representative responds to criticism of the agency by saying it did modify the procedures that were in the hands of the Council, but it cannot modify anything not included in the 2006 Governmental decision: "we have suggested the ministry replace the annex of the 2006 decision with a new one, and we also showed which are the needed modifications" (Ro_Nat#4). It was further mentioned that one of the biggest issues in Romania is communication: "We do not know how to communicate correctly. You would like to communicate with somebody, and they do not understand you" (Ro_Nat#4), referring to the expectations HE professionals had with regards to the new ESGs. In addition, it was stated that as much as the QA agency tries to push the BP-promoted QA policies on the national level agenda, "the speed with which you can implement depends on very many aspects, and one cannot assume that there is a line and everybody will do their part and everything will go hand-in-hand" (Ro_Nat#4).

To conclude, in Romania and Moldova, QA agencies have the main responsibility and authority to propose new methodologies in line with the BP. Unlike in Portugal, where the QA agency is not dependent on national legislation to adjust its methodologies and procedures, in Romania and Moldova transposition is considerably delayed by the final approval of the Government and other stakeholders. As revealed through the interviews, the Portuguese QA agency has been performing in accordance with the BP and with students and academics' expectations. Both in Moldova and Romania, severe issues have been identified with regard to the quality of the involved experts, the politicization of the agency, and their approach in treating QA as a bureaucratic process. The absence of similar national level structures for the SD reinforces the contribution of such structures for fostering national level transposition.

6.4. Conclusions

This chapter was dedicated to explaining the differentiated integration of the BP and the policy changes and reforms taken by the participating countries by focusing on transposition as the second implementation stage within the BP. As mentioned in Chapter 4, transposition is understood as the separation of a policy from the political level to the administrative level and its organizational implementation machinery. It is the point where top-down and bottom-up approaches meet in the policy-making process.

Table 12 provides a summary of the main findings with regard to transposition. The table uses a point scale from 0 to 4 (0 - Not at all important, 1 - Slightly important, 2 - Important, 4 – Very important) to indicate the extent to which the factors under observation matter in national level policy transposition.

Table 12. Transposition - summary findings

Factors influencing adoption	Degree of importance	Context
T1. Bologna Process national representatives' participation in national policy-making processes	Very important	Transposition is more likely to occur when different streams of domestic actors couple, and their policy claims are backed-up by the final targets of those policies.
T2. Socialization processes and exchange of information among actors and stakeholders	Very important	The existing transnational higher education structures provide opportunities to create a space for dialogue among the different stakeholders and develop common practices.
T3. The decision-making authority, discretion, and capacity of implementing organizations	Very important	The presence or absence of a national level agency or structure with a specific mandate to deal with the policy is decisive for national level transposition.

The first factor hypothesized to affect transposition referred to national representatives' (e.g., civil servants in ministerial units, administrative and academic bodies, etc.) meaningful participation in policy-making processes both at the BP and at the national level, and the extent to which they feed back to the principals (top decision-makers) and other subunits or structures with the information acquired at the BP level. Based on the conducted interviews, the three groups of actors most frequently participating in and providing input to national policy-making processes are: domestic actors who participate in the BFUG and its WGs; national experts and BP mediators (participating both at the supranational and national level policy-making processes); and HEIs' and students.

National representatives' participation in the BFUG and WGs and national policy-making processes present mixed realities in the three countries under analysis. In Moldova, despite relatively consistent delegation, national approaches to policy making and the expected implications of the BP policies at the national level (in terms of capacity and resources) hindered alignment with the BP. In Portugal, the BP "mediators" have made an important contribution to creating a common understanding of the BP; however, the ultimate policies are shaped by governments' preferences. In Romania, the inconsistent approach to delegation contributes to a filtering of information and affects the quality of policy recommendations.

The different experts and structures at the national level contribute by providing firsthand input to top decision-makers; however, they encounter difficulties reaching out to

national authorities in charge of HE reforms. Such experts have little visible impact on national reforms. In some countries, experts were consulted or heard when important national level policy developments took place (Portugal, Romania). While in Portugal and Romania nationwide structures evidence themselves as key pillars of research and policy advice, in Moldova such a structure does not exist. As the findings show, such a structure represents a cornerstone for advancing the BP implementation at the national level.

As far as HEIs' input is concerned, it can be stated that they have paved different ways to reach out to national level decision-makers. First, all three countries make use of their Council of Rectors, a structure which, over time, has experienced a declining status and power in HE policy making in all three countries. While these structures can speak with a common voice when policy proposals or issues affect HEIs, in the same measure, the race for competition and resources drives rectors to find alternative ways to push forward policy proposals shaped by their interests. In Moldova, HEIs, especially the more prestigious ones, are in direct contact with HE policy makers and feed in proposals based on their experiences acquired through different projects. In Portugal, national legislation ensures HEIs' voice is heard. In Romania, university coalitions have become a more effective tool for discussing with, debating and lobbying national governments.

The formalization of students' participation in BP governance and national level structures has allowed students to play a proactive role in defending their rights and supporting national level policy makers. Moldovan students have been marginally involved in decision-making processes and student structures have a low level of institutional development and capacity; all of this, together with their politicization, has negatively influenced their representation at the national level. In Portugal, the layering of student representation make the national level assembly the only representative structure for having talks with the Government. The difference among the three countries and the role of students' representation and participation in policy-making lies in the fact that only the Romanian student union speaks the language of the BP when discussing with governmental representatives. This can be attributed to their ESU membership and its capacity building and advocacy work with its members.

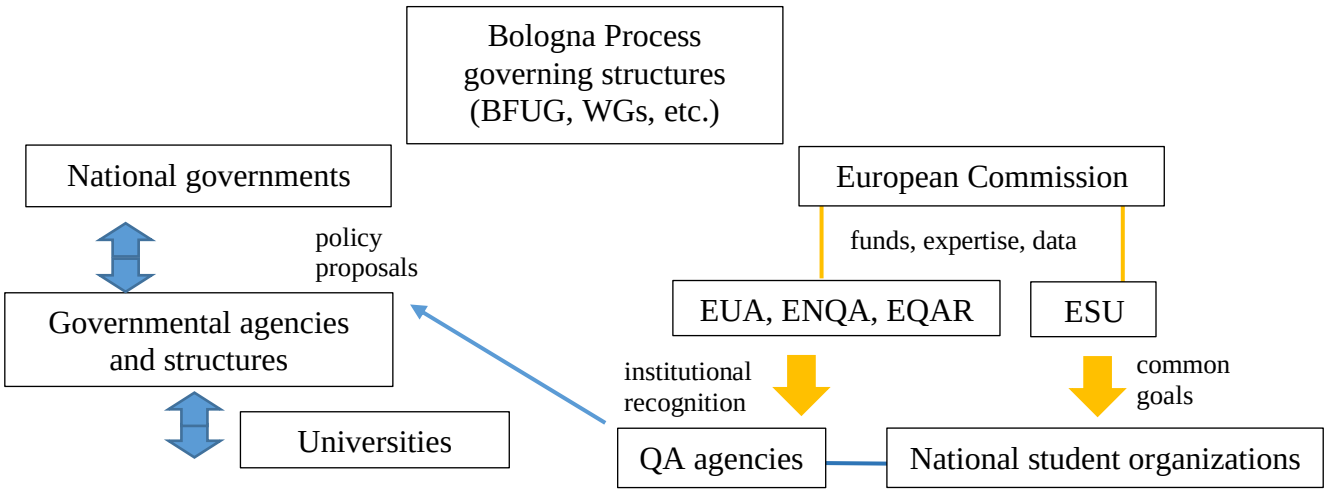
The second hypothesis stated that since the academic community participates in a series of (organizational) socialization processes, the support from the HE community and their interactions with the wider BP community across the EHEA affects the choice of specific policy instruments and implementation mechanisms. For the specific case of QA and the SD, as shown in the previous chapter (see section 5.4.), transnational structures like the EUA, ENQA and ESU and other participating countries have proven to be influential in the

propagation of specific policy measures in the field of QA and the SD by providing participants with ideational support (technical expertise, formal approval and political endorsement) and material support (financial and administrative assistance) to address specific BP policy goals.

Last but not least, it was hypothesized that the decision-making authority, discretion, and capacity that implementing organizations have (especially with regard to QA) affects the further implementation of policy. In Romania and Moldova, QA agencies have the main responsibility and authority to propose new methodologies in line with the BP, yet the final approval remains in the hands of the government and other stakeholders. In Portugal, the QA agency is not dependent on national legislation and has adjusted its methodologies and procedures as promoted by the BP. In Moldova and Romania, severe issues have been identified with regard to the quality of the experts involved, the politicization of the agency, and their approach in treating QA as a bureaucratic process.

Reflecting on the proposed mechanism – stating that socialization processes equip governmental agencies and bodies, societal actors, and the academic community with information about BP developments and contribute to national level policy-making by feeding back to national policy makers – the following can be stated: The causal model predicted that if BP policies have the support of top domestic actors and structures, this may push national policies closer to the ones promoted by the BP and, as a result, BP structures prefer to collaborate with those domestic actors that are in favor of its policies.

Figure 2. Causal Mechanism Depicting the Policy Adoption and Transposition Processes



(Source: developed by author)

Figure 2 above reflects on the proposed causal mechanism linking the above-analyzed factors. As the figure shows, the BP finds itself a "space of dialogue" for both national

governments and transnational structures operating in the field of HE (HEIs, governmental agencies, EC, EUA, ENQA, EQAR, ESU, etc.). While national governments make use of their formal institutions (e.g., ministries, agencies, etc.) to engage in the BP, they can also neglect adoption and transposition. Alternatively, transnational organizations, through a "coincidence of interests" make use of other legitimate, representative domestic actors to lobby and exert pressure on national decision-makers to comply with the BP-agreed commitments.

Figure 2 above illustrates the mechanism at hand: in the first stage, the EC is supporting other supranational BP stakeholders and transnational organizations active in the field to enhance their capacity with regard to their understanding of QA and the SD. This is done through funding, supporting research, data collection mechanisms, trainings and peer learning activities. Provided with the expertise they receive through such instruments, QA agencies and student organizations understand the need to act as a whole with regard to these policy areas. At the national level, the national experts and delegates (in different working groups, secretariat members, etc.) exert pressure on national decision-makers and institutions to comply with the BP-agreed commitments.

This reflects, to a certain extent, the orchestration phenomenon scholars have been talking about recently (Abbott et al., 2015). Orchestration is a mode of governance widely used by international organizations and other governance actors, and entails the engagement of intermediary actors on a voluntary basis by providing them with ideational support (technical expertise, formal approval and political endorsement) and material support (financial and administrative assistance) to address target actors in pursuit of international organizations' goals. Depending on their policy interest, these intermediary domestic actors (national level experts, governmental structures or student representatives) emerge around European level transnational organizations and networks, through joint projects, research activities and other organizational socialization processes, organized under the auspices of the BP and in time internalize and embody the European and BP norms, ideas and practices on their policy area of interest. Further, depending on their position in the policy making processes at the national level these actors provide information and engage in lobby and policy advocacy activities to support the legitimization of BP proposed policies at the national level.

7. Practical Implementation at the University Level

This chapter is dedicated to answering the research question by focusing on practical implementation as one of the last implementation stages in the implementation of the BP (see Chapter 4, section 4.1.3.). The overall dissertation aims to explain the differentiated integration of the BP and the policy changes and reforms undertaken by participating countries and HEIs. The sub-research question this chapter addresses is: *What are the factors explaining the implementation of the Bologna Process' QA and SD policies at the institutional level?*

As mentioned in Chapter 4, practical implementation represents the last link in the implementation chain, with HEIs and students being the end targets of such polices. Knoepfel et al. (2011) distinguish between target groups of policies and end beneficiaries, and argue that one has to match different implementation stages to the corresponding policy targets or end beneficiaries. This argument is also supported by other studies which claim that "actors may play multiple roles simultaneously (e.g. target and implementation agent, implementation agent and entrepreneur) or different and multiple roles at different times" (Flanagan et al. 2011, p. 706). An analytical framework for HE policy implementation must account for the institutional level because implementation depends basically on HEIs' activity. The practical implementation refers to the establishment of the necessary agencies, tools and instruments, monitoring and compliance mechanisms at the lowest institutional level. Since transposition is a necessary but not a sufficient condition for compliance, further work is needed at the institutional level to move implementation. While the adoption and transposition stages can be prerequisites for HEIs level implementation, practice has shown that HEIs can circumvent national processes and implement what fits with their institutional development plan. The growing institutional autonomy across Europe has also contributed to the diversification of the HE landscape both across and within systems, and despite the commonalities promoted by the BP universities have respond in different manners (Musselin and Teixeira, 2014). This has been driven by a series of factors including the national level frameworks targeting universities and governments' financial treatment.

This chapter hypothesizes that the practical implementation phase can be a result of several factors. To begin with, it posits that (1) institutional leaders' preferences for policies in line with the BP and national level policy frameworks are a result of the HEIs' autonomy (and the extent to which they can opt out of implementation), their priorities, and the associated capacities and resources for implementation. Secondly, (2) considering that implementation and monitoring are located in administrative-managerial units, it follows that implementers'

familiarity with the goals of the policy and its perceived added value considerably influences implementation. The corresponding mechanism linking the above factors states that HEIs develop institutional plans and policies in line with the BP and national level policy frameworks as a result of their autonomy and participation as stakeholders in the policy-making processes, but also as a result of the character of the policy and its added value.

The above-mentioned factors and mechanisms will be tested through several HEIs from the countries under consideration. As mentioned in Chapter 3 (for further details on the specificities of the selected universities, see section 3.2.), in Moldova, two universities have been selected, both from the same region and of a similar size; however, they have different profiles: one of them (University **A**) is more comprehensive (focuses on research and education in the social sciences, natural sciences, law and engineering) whereas the other (University **B**) is a higher technical educational institution with an engineering and economics focus. In Portugal, three HEIs have been selected based on their profiles and geographical locations: all are public institutions from the North Central regions with advanced research and teaching; the first has a more comprehensive profile (University **C**), the second includes polytechnic schools (University **D**), whereas the third has a science and technology profile (University **E**). In Romania, three universities have been selected representing different geographical areas and institutional profiles: two advanced research and education universities, one from the southwest (University **F**) and one from the south (University **G**), and a third university with a research and education profile (University **H**).

This chapter presents the principal findings of the current investigation with regard to practical implementation at the HE institutional level in the three countries under consideration. As an indicator of the above-mentioned universities' performance with regard to QA and SD policies, the section provides a summary table presenting the major reforms undertaken by the universities. Further, the chapter discusses the policy-making context at the university level, the HEIs' relationship with the BP, and the main policy-making processes they are subject to. The chapter continues with testing the first hypothesis and explores the role of institutional leadership (rectors and top managers) in setting their institutional agenda and the necessary mechanisms for policy implementation. Next, the chapter tests whether implementers familiarity with the goals of the policy and its perceived added value influences implementation. at the university level. The first subsection looks at the different university structures with (in)direct competence in QA at the university level and explores the implementation of specific ESGs dimensions (e.g., student evaluations, internal QA system, etc.). The second subsection focuses on the SD policies implementation and takes a closer look

at the role of student organizations and the different student support services within universities.

7.1. Higher Education Institutions' Implementation Performance

This chapter aims to test the above-mentioned factors by looking more in-depth at the university-level situation in the countries under consideration with respect to two policy areas, the social dimension (SD) and quality assurance (QA). QA is one of the main foundations of BP, whereas the SD came onto its agenda later on. QA was a top-down approach (promoted by supranational actors) and was considered a priority for the BP and participating countries from the very beginning, whereas the SD came later on (2001) and was brought onto the agenda by students. QA is well defined, operationalized (through the ESGs), and there is a strong (inter)dependency relationship between it and some other BP policy tools and action lines (e.g., ECTS). The SD is an action line that is not clearly defined or operationalized and creates confusion when compared with other action lines (e.g., student-centred learning or lifelong learning). While the previous two empirical chapters looked at the national-level legislative frameworks and administrative acts, this chapter emphasizes the existing policies, strategies and practices at the university level with regard to QA and the SD.

Based on the conducted interviews, the universities' websites, institutional reports and further desktop research, Tables 13 and 14 below present a synopsis of the HEIs' implementation performance. The table uses the following symbols to represent the stage of implementation as follows: ✓ - for complete alignment, ≈ - for some sort of alignment (including not updated information, missing specific aspects), N/A - for no information available and X – for no policy or measure. One of the challenges of studying the implementation of the BP at the university level is that policies that are very much in line with what the BP promotes can emerge from different sources and contexts. As shown in the adoption chapter, all three countries under consideration had national-level frameworks and laws dealing with QA and SD aspects prior to their BP membership (see section 5.6.).

For the specific case of QA, this chapter aims to explain the factors affecting the implementation of the internal ESGs (as portrayed in the table below) since they directly target the HEIs (the external part of the ESGs recognizes the internal QA standards, whereas the third part of the ESGs targets the quality of the QA agencies). Since the 2015 edition of the ESGs also includes several SD dimensions (e.g., learning resources and student support), this dissertation treats them together with the other SD measures.

Table 13. Higher education institutions' ESGs implementation performance

ESG standard	Operationalized	A	B	C	D	E	F	G	H
Policy and procedures for quality assurance	Internal QA	✓	✓	✓	✓	✓	✓	✓	✓
	Policy/strategy Annual plan	✓	✓	✓	✓	✓	✓	✓	✓
Design, approval of programmes	Regulations	✓	✓	✓	✓	✓	✓	✓	≈
Monitoring and periodic review of programmes	Monitoring and periodic review regulations	✓	✓	✓	✓	✓	✓	✓	≈
Student-centered learning teaching and assessment	Assessment and grading regulations	✓	✓	✓	✓	✓	✓	✓	✓
	Flexible modes of delivery and pedagogy	≈	≈	✓	✓	✓	✓	≈	✓
Student admission, progression, and certification	Regulations covering all phases	≈	≈	✓	≈	≈	✓	≈	≈
Teaching staff	Recruitment procedures	✓	✓	✓	✓	✓	✓	✓	✓
	Promotion procedures	✓	✓	✓	✓	✓	✓	✓	✓
	Self/peer evaluation	≈	✓	✓	✓	✓	✓	✓	✓
	Student evaluation	✓	✓	✓	✓	✓	✓	✓	✓
Information systems	Student progression and success rates	N/A	N/A	≈	✓	≈	✓	N/A	N/A
	Career paths of graduates	N/A	N/A	N/A	N/A	N/A	N/A	N/A	≈
	Students' satisfaction	N/A	N/A	N/A	N/A	N/A	✓	≈	N/A
	Profile of the student population	N/A	N/A	≈	≈	≈	N/A	N/A	N/A
	Learning resources	N/A	N/A	✓	✓	✓	≈	≈	≈
	Key performance indicators	N/A	N/A	✓	✓	✓	✓	N/A	✓
Public Information	Publish up to date information	≈	✓	✓	✓	✓	✓	≈	✓
Cyclical external quality assurance	External quality assurance on a cyclical basis	✓	✓	✓	✓	✓	✓	✓	✓

With regards to QA, as mentioned in the previous chapter, all three countries have had different experiences with the national-level adoption and transposition of the EGSs. Romania adjusted quite rapidly to the 2005 ESGs, with the QA agency deciding to copy-paste the ESGs and make them part of the national regulations without proper consultation and debate at the national level; in Portugal, on the other hand, things moved consciously more slowly. Since

Moldova had no QA agency to make the ESGs' implementation a reality, it failed to incorporate the 2005 ESGs and waited for the revised version (2015) to start the implementation at the national level. However, most of the HEIs had been exposed to such practices and policy ideas through different types of projects (e.g., in 2012 QUAEM – Development of Quality Assurance in Higher Education in Moldova). As the table above shows, all HEIs have performed well with regard to institutional policies and regulations targeting different QA aspects; however, when it comes to institutional reports or public information on different outcome dimensions, the data is scarce.

A scan of the literature shows that there are several types of measures adopted by universities, including early interventions aimed at eliminating barriers prior to HE; reserved places for underrepresented groups (Usher, 2015); different types of financial measures and recognition of prior learning (Streitwieser, Ohorodnik and Jeong, 2019); guidance, counselling and mentoring; accessible buildings and activities; assurance about non-discrimination; part-time study options and flexible courses; preparatory courses; childcare on campus, etc. (Claeys-Kulik, Jørgensen, and Stöber, 2019). In the absence of common BP or national SD frameworks, this chapter resumes its focus on whether HEIs monitor the composition of the student body (e.g., parental level of education, rural background), provide (non-formal) access routes to HE for different under-represented groups, have specific student- focused policies or services for enhancing underrepresented groups' retention and completion including student services and facilities (e.g., social, psychological and medical support, housing, meals, childcare, counselling and guidance, etc.) and financial support schemes (e.g., loans, grants, reduced fees, scholarships). Table 12 below presents an inventory of the existing measures the HEIs under consideration have undertaken with regard to the SD.

Table 14. Higher education institutions' social dimension implementation performance

Social dimension component	**A**	**B**	**C**	**D**	**E**	**F**	**G**	**H**
Reserved places	✓	✓	N/A	N/A	N/A	✓	✓	✓
Reduced fees and support grants	✓	✓	✓	✓	N/A	✓	✓	✓
Social scholarships	✓	✓	✓	≈	✓	✓	✓	✓
Monitoring the composition of the student body	✓	✓	✓	✓	✓	✓	≈	≈
Social services office	✓	✓	✓	≈	✓	✓	✓	✓
Psycho-pedagogical counseling and guidance	≈	N/A	≈	✓	✓	✓	N/A	✓
Physical resources and adequate infrastructure	≈	N/A	≈	✓	✓	✓	≈	✓
Distance education	✓	✓	≈	≈	✓	✓	✓	✓
Outreach, counseling and mentoring of prospective students	≈	≈	≈	✓	✓	✓	≈	✓
Preparatory courses and programs	X	X	N/A	N/A	✓	✓	N/A	✓
Lifelong learning			✓	✓	N/A	N/A	≈	✓
Non-degree programs	N/A	N/A	N/A	✓	✓	N/A	N/A	N/A
(Reduced) accommodation	✓	✓	✓	✓	✓	✓	✓	✓
Support for students with special education needs	≈	✓	✓	✓	✓	≈	≈	✓
Program/scholarships for refugees	X	X	✓	N/A	✓	✓	N/A	N/A

National level frameworks can be double-edged swords. For example, the type of admission systems in a country can either positively contribute to or hamper equity and access. National admission systems can regulate whether school streaming leads to some forms of HE and whether HEIs have the autonomy to use their own selection criteria (Orr et al., 2017). Depending on HEIs' institutional missions, the legal constraints or incentives they are subject to, and the financial incentives awarded, HEIs have the freedom to decide on student selection and sometimes apply additional criteria in order to select those fit for their study programmes (Haj, Geanta and Orr, 2018).

In order to explain HEIs' performance with regards to QA and SD policies this section examines the situation at the university level and reflects upon the role of the main actors and responsible parties in fostering implementation. Through the fieldwork it was revealed that HEIs have their internal dynamics and specificities (e.g., the implementation staircase), and at this level one encounters a nested dimension in which rectors and top managers account for decision making and monitoring, faculty and staff account for implementing the HEI's policies and complying with them, whereas students are perceived as the end beneficiaries of such policies.

Based on these observations, the interviews have been analyzed around the following themes: Section 7.2. provides an overview of HEI's autonomy and the HE policy context; Section 7.3. tests the hypothesis according to which policy preferences in line with the BP and national-level policy frameworks are a result of HEIs' autonomy (and the extent to which they can opt out of implementation) and institutional leaders' priorities and the associated capacities and resources for implementation; Section 7.4. tests whether the implementers' familiarity with the goals of the policy and its perceived added value influences implementation. The section starts by looking at the different QA-related structures at the university level and explores the implementation of specific dimensions of the ESGs (e.g., student evaluations, internal QA system, etc.). The second subsection focuses on the SD policies and takes a closer look at the role of student organizations and the different student support services within universities.

7.2. Higher Education Institutions' Autonomy and the Policy-Making Context

As mentioned in the previous chapter (Chapter 5, section 5.4. and 5.5., and Chapter 6, section 6.1.3.) HEIs are provided opportunities to participate in BP structures and decision-making processes (either directly through delegation or through the transnational structures they are members of) and engage in national level policy-making (through their coalitions, the Council of Rectors, or as individual actors). Higher education policy changes are not always the result of the BP but of HEIs' autonomy and governments' policy initiatives and reforms, shaped by national contexts and debates. The BP has been presenting HEIs' autonomy as a precondition to the implementation of the agreed commitments and creating a competitive and attractive EHEA (Matei and Iwinska, 2018). Smdit (2012) argues that "European universities have largely chosen to address the implementation of the Bologna reforms guided by the existing national frameworks" (p. 147). HEIs' autonomy is an aspect that can have multiple dimensions in relation to policy-making in general and BP in particular. Firstly, HEIs' autonomy can question the rational, top-down linearity of the BP. HEIs can resist national level-policies or endorse them formally without specific actions within the institution. Alternatively, HEIs can circumvent national policy-making processes and implement what fits with their institutional development plan (e.g., adopt EU-promoted policies without having a national level framework).

The EUA has been a proactive actor in defining and measuring the different dimensions of autonomy across the EHEA: organizational, financial, staffing and academic autonomy (for an in-depth discussion about its methodology, see Orosz, 2018). In Moldova, with regard to HEIs' autonomy, it should be noted that starting with 2016, HEIs have gained more autonomy

(including financial) and can set their own admission processes, educational program, and human resources policies. An EUA study shows that the autonomy situation in 2011 in Moldova, on all four dimensions, was among the lowest in the 28 analyzed European countries, ranking the country as follows: 27th in organizational autonomy, 20th in financial autonomy, 21st in staffing autonomy, and 23rd in academic autonomy (cited in Erasmus Plus Moldova, 2016).

When asked whether HEIs make the most of their autonomy, a Moldovan national-level expert stated that legally there is no such a thing; there is some degree of freedom in the academic sector, but not in its all dimensions (Md_Nat#2). While some universities do not use their autonomy constantly (or at all), some others use the autonomy argument to become stronger: "making the most of autonomy implies that HEIs have the desire to use it and they have the associated human resources. Some universities need serious improvement in their overall management" (Md_Nat#2). An Education Ministry representative commented that improvements with regard to autonomy are quite slow: "there is a document which states this, but it does not mean that it will change fast" (Md_Nat#4). It was further added that with regard to financial autonomy that HEIs have had some difficulties in the first few years to manage their financial resources. In this respect, the ministry established the so-called strategic development councils (a structure similar to the university senate) with the aim of addressing various issues at the university level (Md_Nat#2).

A top university manager from University A stated that universities in Moldova are aware of the need for more autonomy:

> *We have autonomy at the declarative level, but as far as the "real" autonomy is concerned…we do not have it. Many times, we are stopped from doing what we would like to [even though is within the spirit of the law]. We insist on autonomy, it is in our favor and we need it for real* (Md_Uni#3).

A QA representative from University B stated that university autonomy in Moldova is still something new: "we come from a communist, dictatorial, totalitarian past and people's mentality does not change so fast, especially the approach of the governments. As long as in our ministries and agencies will still have former members of the system, we will not get out of this situation" (Md_Uni#6).

The Portuguese HE scene shows that after the 1980s, the model of state control was replaced with the state supervision (Magalhaes et al., 2013), meaning that the central government reduced its interference in the governance of HEIs. This move was backed up by awarding universities autonomy and power for self-regulation. Portugal's different dimensions of autonomy vary. According to the EUA 2017 autonomy scorecard data, Portugal scores 7th

with regard to organizational and financial autonomy out of the 29 higher education systems under review; 18th in staffing autonomy, and 20th in academic autonomy.[63]

In Romania, university autonomy is guaranteed through the Romanian Constitution. HEIs have full autonomy from a theoretical point of view, "they have sometimes positions, declarations, either through their consortia or through the national council of the rectors, but they do not propose national level policies" (Ro_Nat#3). A former Education Minister stated that in Romania HEIs do not understand their autonomy and "most of them do not really want it because autonomy means accountability; you do not have anybody else to blame if things go wrong" (Ro_Nat#6). Another hindrance with regard to universities using their autonomy is that the policies they propose might be in conflict with existing policies or compulsory national standards (Ro_Nat#5) and require additional resources from the HEIs' side (both financial and human resources).

7.3. Institutional Leadership, Preferences, and Associated Resources

This section tests whether the implementation of policies in line with the BP and national level policy frameworks are a result of HEIs' autonomy, institutional leaders' priorities and the associated capacities and resources for implementation. The section structures the analysis according to several dimensions. First, it distinguishes between the main HE policy-making processes that universities are subject to and the extent to which they can defer from implementation. Secondly, it explores the role of managerial teams at the university level and on the broader motivations for QA and SD policies, including the perceived added value of those policies for institutional development.

7.3.1. Higher Education Institutions as Policy-Making Subjects

Talking about key indicators for universities' performances, a Moldavian Education Ministry representative stated that the ministry annually requires a report from universities on aspects related to their financial situation, the quality of their programs, the quality of the teachers, student success rates, etc., and asks universities to continuously update their websites, inform the public and publish up to date information, especially on admission procedures (Md_Nat#4).

When asked why there are differences when it comes to the ESGs implementation in Moldovan universities, a QA agency representative stated that HEIs have no choice but to implement them: "I would not say that they do not want to implement them, but some realities

[63] For details on specific dimensions and methodology see: https://www.university-autonomy.eu/

cannot be overcome. One of the mandatory indicators states that at least 70% of the professors should have the corresponding scientific degree and title – not all universities can have this" (Md_Nat#2).

At the time of the interview, University B from Moldova was undergoing the accreditation process. Taking advantage of this opportunity, the university revised its practices and internal policies, including the certification of the internal QA system (Md_Uni#5). A QA unit representative confirmed the fact that the Ministry of Education maintains constant contact with universities: "in 2017 we received a letter from the ministry recommending us to improve the study programs based on the external QA evaluations" (Md_Uni#5).

In Portugal, a QA agency representative claimed that the law (and not the QA agency) "forced" Portuguese HEIs to design and implement an internal QA system (Pt_Nat#3). Getting quality assurance into strategic plans and regulations involves a closer collaboration between the top decision-makers at the university level and the national QA agency – so that specific policies are reflected at the institutional level. A representative of the Rector's office from University C in Portugal stated that universities comply with the QA agency standards and criteria because they feel pressured by possible repercussions if they do not:

> *they may close study programs, normally the external committee evaluations make some recommendation, and the agency decides to accredit for one, three or six years, and afterward it can decide to accredit all of the study cycle, or the institutions, or the internal QA system, and at the end of the year, evidence should be provided to prove the compliance with those recommendations. So, it's pressure, important pressure for these institutions* (Pt_Nat#4).

Speaking about the relationship between the QA agency and universities, a QA agency representative revealed that the agency is perceived by universities as a controller who comes to inspect them once in a while rather than a partner and collaborator, "after universities pass through some form of evaluation they keep calm for five years; this is the national philosophy, we need to build a culture of quality" (Ro_Nat#4).

When it comes to implementing the EGSs in Portugal, HEIs have taken on board most of the ESGs due to the fact that quality of education has been a "passport" for the universities abroad and a point of pride (a sign of credibility and trustworthiness) at the national level. The adoption of the ESGs at the BP and national level has pushed universities to adjust to the new context: "our internal quality system was implemented in 2002. Considering the ESGs requirements, we are still working on the optimization of policies and on the implementation of procedures" (Pt_Uni#9). For a university, QA policies are a prerequisite for earning good

evaluation results, which boosts performance in university rankings, attracting more students and more financial resources (Pt_Uni#3).

When asked to what extent the Romanian universities implement the ESGs, a QA agency staff member admitted that there is considerable variation: "some are more advanced, some are not; some things cannot be changed because of universities' traditions" (Ro_Nat#4). A former QA agency staff member pointed out that the implementation of the external ESGs is a prerequisite. Many people responsible for BP implementation within universities do not understand what the BP is about. HEIs have to respond to the national legislation because they will be evaluated against those standards: "if they respond to the external QA policies, then the internal QA will also be tackled. In general universities are trying to follow and comply with what is requested of them. Many aspects are just on paper" (Ro_Nat#5). A Vice-Rector from University G indicated the university has a dynamic community that facilitates the generation of new ideas and practices: "we do not wait for the others to come with heavy regulations; most of the times this erects obstacles to institutional development" (Ro_Uni#1).

Institutional and program evaluations are windows of opportunity for universities to adjust and update their QA policies. In the last few years, University F has been evaluated twice, once by the EUA and once by ARACIS:

> *these have been important moments because we prepared the necessary documentation, self-evaluation, etc. This was an opportunity to put together all the QA-related aspects, to see what can be improved. More important was the report we received after the evaluation: a report with some observations - we see these not as controls, but as something constructive that can later bring us added value. We have analyzed these aspects and we incorporated them into our strategies* (Ro_Uni#5).

Speaking about the incentives of universities to align with national-level QA policies, a QA staff member from University H stated that universities react based on the characteristics of the policy: "if you have a mandatory obligation, then you just do it formally, it lacks content and substance" (Ro_Uni#15). Reflecting on the existence of certain QA policies in University H, the QA management representative stated that universities follow the law and the national QA agency methodologies: "this is what they ask, this is what you do" (Ro_Uni#16). More explicitly, a QA representative from University G stated the following:

> *If we want accreditation and authorization, the university must respond to the standards of ARACIS. If ARACIS says you must have this many books and so many square meters, this is what you must provide! I think most people are not happy with them because they measure a lot, they cut a lot, and there is no emphasis on the content itself. We want to see whether you have done this, whether you have these papers, why you do not have this - you are very much constrained by some papers* (Ro_Uni#2).

University G has been very much preoccupied with quality aspects. It has been volunteering in different evaluation exercises (including the institutional evaluation from the EUA) of doctoral schools/programs. A top manager criticized the way the Romanian QA agency conducts its evaluations, mainly their routinized approach, unproductivity, and the high level of bureaucracy they involve: "this is a big deal, and costly most of the time" (Ro_Uni#1). Similarly, a former student representative in University F reflected on his contribution as a student to the university's self-evaluation:

> *I also did not agree with many things there. When the commission came, I pushed for the things we really wanted, after consulting with the other students. For me as a student representative I was happy that ARACIS could make recommendations that we could later push onto the agenda as legitimate claims and change things within the university. I did not aim to slap the university, but to bring about positive changes for the students* (Ro_Nat#8).

A student has been critical toward the way the national QA agency conducts institutional evaluations: "some evaluations are more than friendly. For example, ARACIS standards say universities should have their own library. Our university did not have one, but ARACIS closed their eyes to this" (Ro_Nat#8). The Education Ministry has its hands tied with regard to quality issues in Romania and this is mainly because of the QA agency. When institutional or program evaluations take part, the university does its best to show everything is in place, yet, "some universities do not report data or if they do, the report wrong or unreliable data; this is a very serious issue, the ministry cannot do anything, not even sanction those universities somehow" stated a national-level higher education expert and University G professor (Ro_Uni#19).

A former QA commission member at the faculty level from University H (and a national-level HE expert) stated that QA is a priority because there is a law that is quite explicit about it. Internally, HEIs are aware that the distribution of financing involves many quality indicators, yet there is a strong correlation between the number of students and national- level financing: "universities' relationship with the ministry is a perverse one, in the sense that the aim is to recruit students, and the effects point towards lower quality" (Ro_Uni#19). Similarly, one of the interviewed vice-rectors at University H stated that "the *per student* financing killed the educational system. If you have a high number of students, you can relax, everything is fine; if you do not have a high number of students you can still produce good stuff, but then you are stressed because your production is not converted into support, you are out of money" (Ro_Uni#20). In Romania, the financing system of HE also includes "supplementary funding" that is distributed based on quality indicators: "we are trying to follow these indicators and to

comply with these standards so we can also attract this type of funding. It is a strange situation in which we are working for the indicators and not for the quality itself" stated one of the deans at University F (Ro_Uni#13).

When asked why QA is such a priority for universities, a QA management representative from university H pointed to the interdependence of QA in relation to other BP policy areas: "QA also involves the recognition of the ECTS. If you say 'QA', it involves everything else. On the other hand, as a process, once you have the ECTS or the recognition procedure, you are almost done, things are moving… QA is a continuous process" (Ro_Uni#16). When asked why quality assurance is an important policy for universities, another QA commission member at the university level (University F) stated that "quality is one of the most important business cards of each university when they are going out into the world; it helps rankings performance and so contributes to attracting students" (Ro_Uni#10).

7.3.2. Managerial Team and the Associated Resources

7.3.2.1. Moldova

Moldovan university representatives consider that the local HE sector is very much affected by what happens in the region and at the European level (Md_Uni#3). Through different EU projects implemented with European partners, different practices develop at the university level: "being part of the BP, we cannot remain distant and watch; we try to integrate depending on our institutional capacities and our educational system" (Md_Uni#3). In a similar fashion, QA structures at the university level get inspired in their practices from other country and institutional contexts: "whenever we have the opportunity to participate in international events, trainings, information sharing seminars, we embrace it. Currently my boss is attending a QA training" (Md_Uni#5).

In University A, starting with 2010, important changes started to take place as a result of the new leadership, which came up with a new development plan for all fields of operation, especially teaching and research (Md_Uni#6). A top manager from University A (Md_Uni#3) revealed that in their institution, teamwork was what led to the state of development the institution has achieved at the moment. Depending on the issue in question, the vice-rectors and the Rector meet and discuss, and a decision is taken as a result: "it also depends whether the issue can be integrated into the vision and strategies the university has" (Md_Uni#3). The university also engages in participative management approaches and consults all levels within the university; however, some issues can be dealt with rapidly within specific units. The managerial plan of the Rector (usually for five years corresponding to the Rector's term) is the

leading document at the university level but is slightly adjustable: "we [the management team] work to maintain the direction assumed by the Rector; we have a vision and we maintain it. What we often adjust are techniques and modes of implementing things, we adjust to the financial situation" (Md_Uni#3).

The most challenging issue in putting into practice the institutional plans is the financing and resources the university has: "it is rather difficult to survive institutionally nowadays; budgets are low, there are few financing opportunities at the national level when we compare this with the EU-level universities" (Md_Uni#3). With regard to human resources, it was claimed that low salaries in Moldova for academics make it very difficult for universities to retain the most qualified academics and staff, most of whom choose to go abroad (Md_Uni#3).

With regard to the SD, recently (two or three years ago) the Rector from University B in Moldova decided upon an internal policy providing different types of material support for various types of students, including disadvantaged students. The motivation behind this decision relates to the decreasing student numbers in the country and the rector perceived this support as a way to motivate students to access HE (Md_Uni#5). On top of this, universities are also motivated to increase access and participation because of financial reasons. A Moldavian Education Ministry representative stated that "currently, higher education financing is based on the number of students the university has as a percentage of the total student population; universities would like to attract as many students as possible and let most of them graduate to benefit from the funding package" (Md_Nat#4).

7.3.2.2. Portugal

In Portugal, all universities have an internal QA system, management instruments, and procedures correlated to BP trends. Rectors and vice-rectors or staff in charge of QA engage in different conferences, seminars, peer learning activities, and projects that provide opportunities to learn from each other and exchange practices and ideas with the aim of encouraging implementation and shared practices. As one of the university representatives mentioned, "participation in international workshops, conferences, and seminars on QA topics is ensured by the top management most of the time" (Pt_Uni#9). Once part of these socialization practices, participants and representatives use the acquired knowledge and information to legitimize decisions at the institutional level.

For example, a Portuguese rector engaged in BP-related activities mentioned that most of the inspiration for the strategic management of the university has come from his participation

in international platforms with different stakeholders in HE, and that QA was a tool to express the university's commitment to building the European Higher Education Area (Pt_Nat#1). A former Rector from University C reflected on the times when HEIs in Portugal did not have to worry about financial aspects, serious investments were made with regard to student facilities and learning infrastructure, and a lot of practices were inspired by examples from outside Portugal, especially with regard to quality and research development (Pt_Nat#3).

In University E, QA policies are defined by the top management and the rectorate level based not just on the ESGs, but also on ISO 9001[64], national legislation, and the university strategic plan (Pt_Uni#9). In University E, the QA system is a centralized one, common to all faculties instead of each having its own structure: "since the faculties do not have administrative or financial autonomy, they apply the procedures defined by the university. They do have, though, pedagogical and scientific autonomy, so they may adjust some procedures to best suit their reality" (Pt_Uni#9). A former Rector from University C pointed out that the vice-rectors can act as gatekeepers for lower management's input on the institutional direction:

> *they can come up with any proposal, I am completely open to it as a policy maker, but normally they speak with the Vice-Rector inside their office and if the Vice-Rector decides it is a good idea, they bring it to the Rector and then we meet. I take it to the Faculty Council for their opinion, I listen to them, but I have to judge politically* (Pt_Nat#1).

In University D, most of the QA mechanisms and procedures are top-down approaches, with the main directions coming from the Vice-Rector in charge of quality (Pt_Uni#10). The institution has a relatively long history with QA preoccupations, with a QA Vice-Rector in place since 1997, and was evaluated by the EUA in 2009. This assertion has been also supported by a Vice-Rector claiming that the Rector and his team play an important role in the strategic planning and the faculty make almost no contribution (Pt_Nat#4).

Within the student services, staff members have difficulties in making top managers understand what the different components of their work imply and mean:

> *I worked with the previous Vice-Rector for four years and somewhere in the second year I was asked to explain what accessibility means. When someone you are working with does not understand what you are saying, how can this person take your proposals further to the management?* (Pt_Uni#1).

[64] A former QA manager from University B from Moldova has also pointed out the relevance of this international standard for assuring the quality at the university level in the years prior to BP membership (Md_Nat#2). See more at https://www.iso.org/iso-9001-quality-management.html

With regard to the SD, a former Rector from University C decided to have somebody in the top management deal with specific social dimension issues. The reasons were rather normative: "I am very sensitive to this, I worked a lot in Europe, and I have this European feeling" (Pt_Nat#1), but at the same time he pointed to the legacy he has created: "I was the first Rector to create this" (Pt_Nat#1). In University E, the student services office is an autonomous unit under one of the vice-rectors (Pt_Uni#8). While there is no national law about special needs support at the HE level, University E has an internal regulation for special needs students. One of the interviewed staff members working for the student services office stated that the existence and overall operation of the office, including the special needs office, depends on the Rector's preferences and vision for the university (Pt_Uni#8).

7.3.2.3. Romania

In Romania, some universities rely on national legislative frameworks and follow them, whereas some want just to maintain the *status quo.* At University H, early policy changes within the university were associated with institutional leadership: "it depends a lot on the internal decision-making structures. Under Rector X we were a leader of Romanian universities – he set the priorities and we rowed in the same direction" (Ro_Uni#15). Some of the previous rectors at university H have been proven to be good analysts and anticipated the national governments' policy reactions:

> *our Rector would come back from some conferences with a new approach on how we do things. None of the Romanian universities were doing student evaluations; we were, and then it became a law. He had an openness towards tendencies. He was saying: "In two or three years we will also need this." The advantage was that we were two to three years ahead in terms of documentation before national laws were adopted, we already had a mechanism in-place and it was not surprising for us* (Ro_Uni#16).

In University H, QA staff member at the university level indicated that QA is a "Western measure": "it is something that any university can do without any type of national support. You can have a unit without being backed by the legislation or ministry" (Ro_Uni#15). Moreover, it was specified that QA developments in the late 1990s within the university happened mainly because the rector in charge wanted to make the university more comparable to others in Europe.

The institutional dynamic is very important. In University H, a professor referred to previous institutional leadership phases dominated by a "very hierarchical organizational style, with many top-down decisions that could not be justified" (Ro_Uni#19). The current situation has changed: "faculties have more power, there is space for negotiations, the vice-rectors are

people with ideas who try things…Some deans can be very influential, their power depends on the size of their faculty and their resources" (Ro_Uni#19). It was observed that in University H, vice-rectors need to incorporate other structures within the university making new proposals because there are several overlaps in their work and the expertise, practices and lessons learned are found at the lower administrative structures: "in QA issues we involve many colleagues from other departments. I am a biologist; I do not know how to best design an evaluation questionnaire. I am just trying to coordinate and come up with the idea, but I cannot act as a specialist in the field because I am not" (Ro_Uni#20).

A vice-rector at University H stated that European strategies and targets, including the BP, represent points of reference for internal policy making:

> *this is because we consider ourselves not just a university tied to what happens inside the country, but also to what happens in the European Union. If I take the QA manual, for example, you can see references in it to the EUA, the Magna Carta Universitatum, Bologna… This is why we do things, because we believe what we do is good* (Ro_Uni#20).

The QA policies at the university level in University H were a result of two main drivers. On the one hand, the university management cared about what the professors and students think of the university and how the management can improve and enhance academic quality; on the other hand, there were European trends, and national legislation stipulates a minimum set of QA policies (Ro_Uni#20).

In University G, the internal QA structure started to take better shape and become more systematized as a result of the rectors' preferences. Around 2007, in the context of Romania acceding to the EU, there were national level discussions about quality; the Rector - very much connected to what is happening in Europe - and one of the QA management staff got inspired by European-level trends (i.e., the EUA) and projects the university had been implementing, which strengthened their choice in this regard. The QA staff at the university level did not hesitate to mention that the EUA is a reference point for the university (Ro_Uni#2). When asked how policies are formed within the institution with regard to QA and how input is provided, the QA unit representative stated that at University G the "supreme chief" is the Vice-Rector, but "the people who work on the QA report at the faculty level can notice that some things work or some do not – this is one of the input sources. In addition, before we ask for the report there is a preparatory meeting with the commissions at the faculty level where we talk about the last year's experiences, how we should go about things this year, and whether

there are any proposals. Some commissions have a high number of members, but not everyone is so vocal, the hierarchy is respected" (Ro_Uni#2).

When asked what is needed for a strategy to be implemented, one of the vice-rectors at University F drew attention to the available resources (financial and human) the university has, their predictability, and the way such resources are ensured: "you need to ensure you have consistent, prepared staff. It is one thing when you work with two people and another when you have 10 working on quality issues" (Ro_Uni#5).

With regard to the SD, one of the former student representatives at the national level pointed out that in Romania, most things are conditioned by the level of financing, whereas universities have a certain level of discretion or sometimes look for legislation that can support their policies:

> *The West University of Timisoara provides flexible learning paths programs, for which there is some kind of legislation. The University of Petrosani allocates 0 % for social scholarships. This is not acceptable. Instead, they have benefits for professors. The University of Alba Iulia allocated 10 budgeted places for Moti students [a minority in the region]* (Ro_Nat#7).

Another former student representative pointed out that the SD policies HEIs present are not nationwide policies but rather the individual choices of universities (i.e., social offices, orientation and counseling centers, increases in social scholarships) as a way to balance their emphasis on meritocracy (Ro_Nat#3). At University H, one of the interviewed professors pointed out that the distribution of the reserved places for Roma is decided internally as involving fields of study for which there is little competition and fewer students (Ro_Uni#19).[65]

7.4. Implementers Familiarity with Policy Goals

This section tests whether the implementers' familiarity with the goals of a policy and its perceived added value influences implementation at the university level. Ensuring the final, practical implementation is, most of the time, the responsibility of administrative staff. The assumption here is that there is a strong link between workers' willingness to implement a policy, the content of that policy, and its intended outcomes (i.e., if workers are convinced of the aims and benefits of a program). Depending on the monitoring and reporting mechanisms, front-line workers have the possibility to apply their own judgments when dealing with the

[65] Research has shown that Roma students enroll less frequently in STEM fields (which are more competitive) and this has the potential to negatively impact their competitiveness in the job market upon graduation (Garaz and Torotcoi, 2017).

needs of those who are the final targets of the policy. The first subsection here starts by looking at the different university structures with indirect competence in QA at the university level and explores the implementation of specific ESGs dimensions (i.e., student evaluations, internal QA system, etc.). The second subsection focuses on the SD policies and takes a closer look at the role of student organizations and the different student support services within universities.

7.4.1. The implementation of the Internal European Standards and Guidelines

7.4.1.1. Moldova

The Moldovan QA agency "through its standards, obliges HEIs to have internal QA structures" (Md_Nat#2). Both Moldovan universities interviewed have their own (individualized) QA policies that were launched in the late 1990s. Such policies were the results of the rectors' teams and international actors being interested in the overall development of the education system. Starting in 2015, Moldovan universities are required to have a permanent structure that oversees the implementation of a quality-improvement action plan, prepares institutional level analyses, etc. (Md_Nat#2). The Education Ministry representative stated that the QA agency has started to revise the study programs from the ESGs' perspective (this is done cyclically every five years). Moreover, it was stated that there are many obstacles in the implementation of the ESGs at the institutional level. At the internal QA structure on the faculty level, things move slowly; it was stated that it is very difficult to convince professors to annually adjust and revise their curricula (based on student opinions and labour market demands). There is a need for new assessment methodologies for the final exams and a need to update and enhance the quality of the teaching material, including the teaching infrastructure and teachers' professional development: "all these [things] cost money and that is why things move slowly" (Md_Nat#4).

The QA system in University A is very hierarchical: the QA unit is subordinated to the Vice-Rector responsible for QA. Overall, the QA management system is highly decentralized, but functions well: "it was difficult to make the management understand what QA means" (Md_Uni#6). The lowest teaching unit (*catedra*) has a representative on the QA Commission at the faculty level, and the QA presidents at the faculty level form the QA Council, which is composed of the president of the QA Commission at the faculty level, a representative of the QA unit, a student representative, and employees.

One of the QA managers at University A stated that the QA unit was introduced in 2005 when Moldova joined the BP: "maybe it was not completely clear [then] what all this would mean, there were many dispersed activities with different types of people involved"

(Md_Uni#6). In 2012 the university underwent an accreditation process and as a result understood that a stronger QA structure was needed (Md_Uni#6). In University A there is a Senate Commission on QA - whose role is crucial in supporting the QA unit's proposals and the QA Commission at the faculty level. The latter is in charge of analyzing the student evaluation surveys for each program. The results are aggregated in a report and presented within the faculty council; however, they are not made public (Md_Uni#6). One of the presidents of the QA Commission at the faculty level from University A pointed out that the faculty can bring their QA issues and proposals to the council, but the extent to which these are approved depends on how much they deviate from the university's standards and criteria (Md_Uni#7).

The head of one of the QA management sections from University A referred to the fact that the ESGs' implementation had been always a concern, but it was more intensively promoted as a result of the German QA agency's accreditation. The unit's work is supported by the management only "as long as it does not imply enormous financial resources" (Md_Uni#6). One of the presidents of the QA Commission at the faculty level from University A pointed out that the mechanism of e-mail communication is used with the other commission members (Md_Uni#7). The effectiveness of the channel was not questioned; rather, how the members react to the content of what is communicated was questioned.

At University B, QA assurance is structured a bit differently. At the university level the Vice-Rector responsible for study programs oversees the academic management unit that supervises the QA section. The latter works directly with the faculty-level commissions that monitor educational process and examinations, assist classes, conduct surveys, etc. (Md_Uni#5). At University B, one of the former QA managers at the university level pointed out that that they have been the leaders in Moldova in having an internal QA system. This was an outcome of an Erasmus + project from 2001 run in collaboration with other universities from the region (i.e., Romania) (Md_Nat#2). Through such projects, the university management became more familiar with the BP and started to think about and integrate different types of practices into daily operations.

As far as student evaluations are concerned, at University B the QA unit engaged student representatives in administering the surveys. Teachers were in charge of their course evaluations but were not enthusiastic about the job (Md_Uni#5). In University B, students are part of the QA commissions at the faculty level, and in 2016 the students' senate was approached to take charge of the student evaluation surveys: "it was a way to minimize the degree of influence teachers had in the design, distribution and analysis of the survey. The

professor could recognize your handwriting and students were therefore reluctant to say what they really felt like saying" (Md_Nat#8). In both universities, student evaluation surveys had a low rate of response, mainly because students could not see the potential of their evaluations to foster change (Md_Nat#8).

Overall, from a procedural perspective, the implementation of the ESGs in Moldova is in an incipient phase. While the universities already had internal QA policies, the depth of implementation did not go beyond a set of administrative procedures and bureaucratic exercises. The fact is that the QA agency understands the situation of Moldovan universities (i.e., competition for students, limited financial and human resources) and does not set high expectations in this regard. It is obvious that the current QA frameworks at different levels within a university aim to foster a set of practices that will be internalized by the universities over time.

7.4.1.2. Portugal

With the current paradigm shift in learning, universities do not just transmit knowledge; nowadays, the subject of pedagogy is becoming more and more important within HE contexts, and most universities put a lot of emphasis on pedagogical innovation. With regard to modes of teaching and pedagogy, in Portugal HEIs have so-called pedagogical councils; at university level these are not directly related to the BP. However, as one of the top managers stated, nowadays there is a strong relationship between quality policies and the pedagogical councils (Pt_Nat#4). The pedagogical councils provide a space where students and professors discuss quality, difficulties, and the problems of their programs (Pt_Nat#3). These evolved naturally within the Portuguese HE context: "30 years ago if you would have asked universities about the importance of pedagogy, they would have laughed at you, it was not important. Nowadays everybody considers it important, pedagogical concerns are increasing" (Pt_Nat#1). Students perceive such structures as good opportunities to make their voices heard, but follow-up remains questionable (Pt_Nat#2). A professor from University C involved in several structures within the university (senate member, pedagogical council, QA unit) pointed out that teachers' participation in these administrative tasks makes them more aware about specific issues in the learning process (Pt_Uni#3).

For some teachers, the pedagogical council provides an opportunity to come together and remind each other of administrative requirements (i.e., submit summaries of the disciplines and updated bibliographies). For students it is an opportunity to bring up their concerns: "they complain that teachers do not come to class, or are late, or do not provide explanations of the

students' final results" (Pt_Uni#3). Depending on the issue, it is taken further to the director of the study program or the scientific council.

Portuguese academic culture highly values senior professors. While their experience and knowledge are unquestionable, their teaching methods might not be so flexible: "we have an intergenerational problem; our faculty is diverse in many respects, the more senior teachers maintain their way of thinking whereas the younger ones are more innovative; it is difficult to work with such diversity" (Pt_Uni#3). Similarly, it was stated that

> *Some of our professors are very old, so it is really hard to implement a new teaching concept. Of course, they are at the end of their career, how can you force them to change if they are in their 60s? They are very interesting because they have different perspectives and a lot of knowledge - but not about teaching* (Pt_Uni#1).

In University D, a similar issue has been identified with regard to teachers' willingness to improve their teaching methods (Pt_Uni#10). Through its Pro-Rector in charge of pedagogical innovation, University C provides different opportunities for professional teaching development (i.e., using new technologies in the classroom, collaborative learning, etc.), but just around 10 % of the faculty-level professors take advantage of this opportunity (Pt_Uni#3).

The QA agency representative stated that the cyclical institutional and program evaluations are costly, time-intensive processes which might not affect institutions directly; they target the top level of the administration rather than the specificities of teaching: "we are trying to use a mixed system, in those cases where the institution has an internal certified QA system we will evaluate just a sample of the programs instead of examining them all" (Pt_Nat#3).

Talking with representatives from the QA unit in one of the Portuguese universities, it became clear that for universities, most of the job is administrative and requires occasional reporting on different related issues. The motivation for this person to be part of the unit was general interest in the fate of the faculty where the person was teaching. Compared to the situation a few years ago, the person stated that nowadays the job is not that demanding, due to the information system at the university, but nevertheless it requires more work when institutional or program evaluations are to be conducted. The internal QA structures responsible for implementing and monitoring QA policies in Portugal are structured differently by each of the universities under consideration: some universities choose to have representatives from all faculties, students, and the private sector in these bodies, other universities choose to keep it rather decentralized and have faculties responsible for quality assurance, provided there is at least one person who is centralizing the activity.

From the perspective of the internal QA structures, the lack of human resources and efficient communication procedures poses particular challenges in implementation and in promoting a quality culture common to all university units. It has been often stated that at the faculty level, the human resources who work on QA procedures are also the ones that assure other critical tasks, leaving them with little time to work on the quality-assurance system (University E, Pt_Uni#9).

A representative from University D stated that compared to 20 years ago, a lot of things have changed with regard to QA: "some technological platforms are appearing in which we have to include information, the kinds of details that are required have also increased, also the teachers' evaluations are becoming more formal, and really a system for the evaluation of teachers has been created. At that time, we had no system of evaluation" (Pt_Uni#4).

When asked about the main channel of communication with regard to QA issues at the faculty level, a staff member stated that e-mails are the main channel, but this is rather one-way communication and there is no feedback from the faculty side: "I send them QA plans and ask for their collaboration, but they do not respond" (University C, Pt_Uni#3). Similarly, a QA representative from University E stated the following:

> *Promoting the involvement of teachers is a challenging task, not only because quality assurance is still seen, sometimes, as a minor task, more suitable for support staff, but also because teachers have really busy agendas. Between teaching, researching and knowledge transfer, and despite quality assurance being intrinsic to all of these activities, teachers usually struggle with a lack of time to participate in quality assurance in a more structured way. Some of them want to participate but don't have time, while others don't want to be involved directly* (Pt_Uni#9).

As revealed through the interviews, the QA structure of University D complies with the QA processes in all its dimensions, including participation by students, student evaluations, etc. At University D, concerns have been raised over the effectiveness of the internal QA system (last certified in 2017) and a restructuring of the system has been discussed as a way to comply with the guidelines of the Portuguese QA agency A3ES. When weaknesses are identified within a course, the person responsible for the course needs to submit an improvement plan for it that describes the resources needed for putting the plan into action (approximately 10 % of courses have submitted an improvement plan) which is then validated by the program commission (the program director, teachers, student representatives) and analysed by the pedagogic council (Pt_Uni#10). Portuguese universities do not consider the QA agency evaluations as a control mechanism but rather as improvement: "it is a moment of reflection on how the university actually works, in order to assure its own quality" (Pt_Uni#10).

An interesting point about the same university, with regard to the student evaluations, was the fact that higher management purposely does not share those results with the public even though the EGSs refer to this aspect. The reason is that, on the one hand, the response rate has been low, and on the other hand, the management did not want to put certain courses or professors on the spot. This situation is not unique Portugal or the EHEA countries. At University D, student survey results are not public; they can be seen only by the teachers who have taught that curriculum unit, by the director of the degree program, and by the director of the department and the rectorate: "I cannot see the results of my colleagues" (Pt_Uni#4).

A student representative revealed that student evaluation forms have a low response rate (around 30%) (Pt_Nat#2; Pt_Uni#3). At University C, student evaluations are open to students after the completion of coursework and final exams "the survey is short, interactive, bilingual but students do not fill it. A lot of students can point out what is wrong within the university, but very few are willing to make a change and provide feedback" (Pt_Nat#2). University E students can skip the teachers' evaluation survey a number of times, but will have to complete it in the end (Pt_Nat#5). Another student representative pointed out that students' evaluations are not mandatory and there are no incentives for students to complete the forms (Pt_Uni#2). Alternatively, student opinions are taken into consideration, and if an issue is signaled several times most of the time the pedagogical council is trying to find a solution to it (Pt_Uni#2). The low rate of student evaluations has been attributed to a lack of trust in the change evaluations can bring, and there is also a misconception among students that their teachers will penalize students if evaluation scores for their course are low (Pt_Uni#7).

7.4.1.3. Romania

By law, each HEI has to have a QA commission for quality evaluation according to the BP. University H had several QA policies in place before the national-level adoption of the 2005 ESGs. University H has a quality management unit and a university-wide commission of around 13 people. At the faculty level there are commissions for each faculty (a minimum of three people), with a professor as the QA president. The role of the university-wide QA management unit is to ensure a link between the faculty commission, the university-wide commission, the university senate QA commission, and the Vice-Rector responsible for QA.

At University G there is a Vice-Rector in charge of QA, a permanent, university-level QA structure, and commissions at the department level (with members elected for the duration of the rectors' mandate and led by a dean). The main aim of the university QA structure is to

put together the university QA report, which is an aggregation of all the faculties' reports (Ro_Uni#2).

At University F, QA is under the responsibility of one of the vice-rectors. In 2009 a QA department was opened at the university level. It is supposed to provide support to all the faculties for preparing their accreditation documents (Ro_Uni#14).The department oversees the activity of the QA commission at the university level, which then oversees the QA commissions at the faculty level. The main task of the QA commission at the faculty level in University F is to analyze student surveys, the peer evaluations of the professors, and to write a faculty report annually (Ro_Uni#4). One of the QA commission members at the university level (University F) revealed that her involvement in QA activities was motivated by the fact that not only does it help her understand things better as to what is expected from teachers, but it also matters for getting a promotion and upgrading oneself (Ro_Uni#10). The QA representative at the university level (University F) indicated that the structure itself does not provide any follow-up support for cases in which quality issues were revealed through the different types of evaluations (Ro_Uni#14).

If almost 15 years ago universities had several procedures, an internal guide, or a manual on QA, the intensity of the work has since expanded incrementally and QA has become more and more formalized. The QA management representative noticed that QA requirements have been constantly increasing (Ro_Uni#16). Overall it has been revealed that lower-level QA structures treat QA superficially: "unfortunately, some deans do not even know there is a quality handbook…Most of the people are not familiar with the structure, the content, or what is expected from them. Some know, some do not" (Ro_Uni#16).

One of the professors on the faculty level commission at University F stated that this job had been assigned to her:

> *I am a full-time professor; besides this, I am expected to be involved in administrative work and to do research. This was rather like an administrative burden for which I had been given no preparation or training, I was given a QA handbook that was quite vague and I had to write annual reports. Most of the information in the report was purely administrative, not even the secretariat or the administrative office had it. Some aspects could be ticked off* (Ro_Uni#3)

Through the interviews it was revealed that in Romania, there is a need to change the culture or the mentality component to help staff and teachers to work properly: "we would like to arrive at a moment when a professors is aware of his/her dysfunctional relationship with the students, to intervene immediately and not wait for the student to tell us that something is

broken and not working or does not correspond to some standards" contended a Vice-Rector at University G (Ro_Uni#1).

When asked what is needed for strategy to be implemented, a vice-rector at University F drew attention to the topic of quality culture:

> *you need people who are able and available to take the message further, as it is aimed to be… I say openly that certain people do not pay enough attention to their job descriptions. The department directors are elected by popular vote, so they cannot afford to be exigent with those who voted for them* (Ro_Uni#5).

Similarly, in University H, a professor referred to the weaknesses of the "collegial system" in which the faculty heads are elected and this brings limitations to the change side; "none of them promotes serious changes, considering that they would like to be reelected by their colleagues" (Ro_Uni#19). One of the deans at University F stated that there are different quality aspects which nobody measures and that the ones they are taking care of are related to the quality of the educational process, especially with regard to pedagogical training and teaching techniques. These are all part of the unmeasured aspects of quality. Data gathering is a different aspect of what they call "quality" (Ro_Uni#13). A similar issue has been reported in University H:

> *I was a department head for many years and there were some extreme cases in which the professors were not teaching, not coming to classes. I realized how limited the university instruments are for ensuring quality teaching: salaries are fixed, there are no penalties* (Ro_Uni#19).

When asked what the motivation of professors is to get involved in QA activities, a QA staff member from University G stated that some people are, through their nature, more preoccupied with getting involved, they care, and they are oriented toward making the education system more efficient. The university has engaged in different types of activities aimed to make professors develop a quality of culture: "we have different trainings and presentations for both professors and administrative staff – and this is just a tool, an opportunity for them to voice their concerns and ideas, a 'quality newsletter' with different news, information about events and best practices within the university" (Ro_Uni#2). Speaking about specific QA trainings, the QA representative from University G stated that starting in 2008 the university provided training with regard to the formation of QA professionals (i.e., internal auditors), yet for some professors and staff QA has become a burden: "teachers have courses, they cannot make tradeoffs" (Ro_Uni#2). Depending on the resources available, University G, provides opportunities for professional trainings for teachers, i.e., training on technology use within the classroom.

University F has established a recent unit in charge of pedagogical training (as an output of an EU-funded project). While the department for quality management applies specific quality assurance instruments, this unit steps in and takes things further through their professional development programs (Ro_Uni#9). The unit provides different types of courses supporting teachers, including in foreign languages, e-learning use, how to build your teaching portfolio, etc. (Ro_Uni#3). There are some teachers who are more senior and have different teaching methods, but these are isolated cases (Ro_Uni#10). This type of approach has not been welcomed by the professors because they felt they were being a bit "told off" (*dascaliti* in Romanian); they considered themselves already fit for the job they had been selected for.

In addition, this unit has been engaged in European-level projects promoting teacher mobility and exchanges. A representative of the unit stated that this was needed because there are a lot of research centers across universities but almost nothing on teaching, and it is really important to be able to combine the two and develop a student-centered approach to teaching (Ro_Uni#9). Two of the interviewed vice-rectors from University F stated that this unit "is a place through which we try to put together some policies for professors' development in terms of teaching and research. We believe there is a need within the community to develop and implement small courses, workshops targeting the professors on teaching techniques, evaluation, information usage techniques…" (Ro_Uni#6).

In a specific faculty of University F it was stated that student evaluations matter especially for promotions and pay raises: "each department director has a template with different criteria and points for promotion - if you do extracurricular activities for university development, activities with students, with prospective students…"(Ro_Uni#4). University F decided to hold the student evaluations online, which made the response rate drop considerably. Professors spotted several weaknesses with regard to the student evaluation surveys: "in the last report I received from students I was evaluated by around seven to 10 students per field where I have around 50-60 students. I received the last report during the summer" (Ro_Uni#3). At University G, student evaluations are administered on paper and the response rate is under 10%.

A QA management representative from University H stated that student evaluations are an important component. Faculties are expected to make available a report of the results and if a teacher does not meet a certain threshold with regard to student evaluations, they will have to submit an improvement plan (similar to some universities in Portugal). In addition, teachers have to be evaluated once every four years by their peers: "my experience is that these types

of evaluations are very subjective; teachers know they will be evaluated by their peers so they have to evaluate as they expect to be evaluated" (Ro_Uni#16).

7.4.2. The Implementation of Social Dimension Policies

This subsection focuses on the implementation of SD policies and takes a closer look at the role of student organizations (the structures closest to students) and the different student support services within universities as the main actors associated and entrusted with student affairs.

7.4.2.1. Moldova

A national-level student representative pointed out that when comparing QA policies and structures at the university level with the ones focusing on the SD, the QA policies require the involvement of teachers, their preparation, etc., whereas students can deal with social aspects since the number of cases is manageable (Md_Nat#8). In Moldova, it was claimed that the outcomes of student representation at the university level depend on the quality of those representatives: "there are faculties that have docile students, some others have more vocal ones who create discomfort among teachers" (Md_Uni#2). A former student representative from University A referred to the fact that student representatives at the university level are appointed by faculty and have a lot of support from the Rector or their deans. When it comes to students' opinions on certain decisions, such students tend to side with the management. In addition, it was stated that certain policy-making processes at the university level did not include student consultations, or that decisions have been taken and students informed much later (Md_Nat#3).

In most Moldovan universities there are the so-called student senates (representatives from all faculties) and syndicates (inherited from Soviet times) that are the more institutionalized structures of student representation, managed by the universities' administrative councils. Besides this, starting in 20166, there are the student self-governing structures that are more independent from the universities. Students are represented in different administrative units (it is mandatory by law to have 25 % student representation). Students are represented by their peers and by the administrative staff in charge of student issues. In University B, students contributed to an internal policy proposal on providing scholarships for

[66] One of the interviewees reported that one year after the introduction of the law, research was conducted to assess the extent to which HEIs have implemented this provision. The results found out that of the 31 HEIs, around six or seven had such a structure, three had no structure or internal regulations, and the rest "had it just on paper" (Md_Nat#1).

talented students – and to the way in which the selection process is run (Md_Nat#8). The student senate in University B from Moldova collaborates with the student syndicates on various socio-cultural issues, including accommodation, analyzing specific student social cases, charity campaigns, and various internal educational policies (Md_Nat#8). In this specific university, the student syndicates are in charge of the social dimension of HE: "they have a comprehensive database of the social situation of the students" (Md_Nat#8).

As far as the social dimension is concerned, both universities have a social services structure in charge of student accommodation issues. As observed during the fieldwork and revealed by the interviews, scholarships or any other type of financial aid are limited in Moldova, one of the poorest countries in Europe. Moreover, because of the competition for financial support, corruption and nepotism arises in its allocation, even despite the fact that student numbers are decreasing. HEIs are not making any further attempts to broaden access and participation. As previously mentioned, Moldova has a quota system for nine different underrepresented groups, but it was revealed that most of the interviewed actors at the university level could not refer to the experiences of any such students in the HE environment. Student representatives have complained that universities do not have the proper infrastructure needed for students with different types of disabilities.

An administrative staff member from the student syndicate at University A stated that he represents students at the university level (Md_Uni#8). The specific duties of this type of social service relate more to providing support for student-led activities (i.e., support in organizing events) rather than providing student-targeted services. Yet, they support the university in the distribution of scholarships and accommodation allocation. When it comes to scholarships there is a commission at each faculty made up by the dean of the faculty and the student president of the syndicate (Md_Uni#8). Practically speaking, the student syndicates do not have the necessary financial resources to do more. Syndicate members and scholarship recipients have to pay a contribution fee. Around 75% of the student body are members of the syndicates. One contribution of the syndicate is that it has succeeded to negotiate with the national transport company to obtain different types of discounts for their members, or access to sports facilities. A former student representative criticized the work of the syndicates as follows: "I was refused accommodation in student dorms because I was not a syndicate member, which is totally different from what the law says" (Md_Nat#1).

7.4.2.2. Portugal

At the university level, Portuguese students have many opportunities to make their voice heard and open up student-related issues. By law, students are represented in the university senate and pedagogical councils. Internally, in most universities, there are councils of representatives at the faculty level and the students' ombudsman. In Portugal, student representatives at the university level have little knowledge about the BP but play a proactive role in SD measures.

When asked what the main student issues at the faculty level are, a student representative stated that usually student associations promote different types of complementary workshops and trainings, cultural and sports activities. Depending on the context, the students' general assembly at the faculty or university level (held once every a month or bimonthly) brings student issues to the attention of those who can decide and solve the issue (i.e., a specific teacher, social services, a course director, etc.): "we have asked the administration to make our campus building more accessible for blind students or those in wheelchairs. I had a blind colleague; we understood the difficulties our colleague experienced so we became more aware of what we have to do in order to be equal" (Pt_Nat#2). This illustrates how student diversity can be enhanced. In contrast, in Romania a student representative pointed out that student associations do not work on Roma issues because Roma do not represent a significant number of students either within their university or at the national level (Ro_Nat#8).

Depending on their presidents, various student associations from Portugal have obtained offices or departments dealing with student issues. The role of the associations is not to provide specific services, but to support students (especially students with special needs) in accessing university-level social services (Pt_Uni#7). A student representative pointed out that the student association she represents has a funding scheme supporting students with economic difficulties which supports students upon request with voucher meals and assists (i.e., recruits volunteers) the faculty-level student services office (Pt_Uni#6).

A university-level student representative (University C) pointed out that student associations are associated with socializing activities (i.e., student parties and festivals) and less with academic matters; nevertheless, student associations have been developing partnerships with different local services in providing various student discounts (i.e., in sports, healthcare) (Pt_Uni#7). Over the last two or three years, student organizations have been focusing on boosting student graduation rates and facilitating labour market transition by

providing closer links with companies and the industrial sector and by providing workshops strengthening students' soft and hard skills (Pt_Uni#7). A student representative at the faculty level in University C revealed that through their student association, they have supported around 20 students in need per year to receive a number of free meals and other discounts (i.e., at the copy center) (Pt_Uni#2).

Student associations in Portugal have created strong connections with the offices of the municipalities where the universities are based, and together they tackle social aspects of local student life. One student representative pointed out the practice of matching students with elderly citizens providing accommodation as a way to enhance student accommodation for those who cannot afford it (Pt_Nat#2). A university-level student representative pointed out that students have also demanded more police patrols around the campus areas (Pt_Uni#7).

The main activities in this respect have been focusing on students with special needs, student services, or employability. A common feature encountered in several Portuguese universities was an internal university fund to help students in need, a system that complements state-granted support. With regard to the social scholarships in Portugal, HEIs, through their social services, are providing the needed support for eligible students to apply for such scholarships (Pt_Nat#2).

At University E, the university's student services provide support for students with special educational needs, with psycho-pedagogical counseling, and with their accommodation arrangements. In the last five years substantial investments have been made in infrastructure, learning and teaching equipment, mainly due to the financial resources of the services office and the university's budget line for this type of special support created 10 years ago (Pt_Uni#8). As mentioned above, the Portuguese Government runs a nationwide social scholarship scheme (but there is no law on special needs education at the HE level). The additional social support fund from the university aims to complement the Government scholarship: "some students, some families do not have enough income and they do not meet the criteria set for the Government scholarship, they can apply for this kind of help"(Pt_Uni#8). The provided student social services are also performance-based and the office has a psycho-pedagogue, a coach, and a peer-mentoring program (especially for students in their first year) helping students improve their academic performance and maintain their financial support. The office collaborates with different structures within the university, including faculty representatives and the pedagogical council, the student ombudsman, and student associations.

University C provides support for students with special educational needs, but compared to University E, there is no university budget line for such support:

We do not have an explicit specific budget for special needs, yet we can use funds from our general budget [for this]. We could provide Portuguese sign language interpreting for deaf students, that was an achievement. Previously deaf students were choosing other universities that offered sign language support (Pt_Uni#1).

The special needs officer from University C stated that approximatively 20 years ago there were very few students with special needs at the university. Students began aiding their peers who needed assistance and after a few years (in 1997) a student service was starting to take shape: "we started to find ways for them to be included, we started with technology, we asked for money from several institutions to buy a Braille printer, computers, to have means for them to actually work in a dignified way" (Pt_Uni#1). The teachers were among the first to care about the issue, then a new Rector took office and the situation changed for the better. In 2000 it became a service of the university as a whole and the university attracted new students with new challenges with physical impairments, etc. In 2017 there were around 175 students who benefited from the services of the office (Pt_Uni#1). In 2008, when the university leadership changed, an internal regulation was in place targeting services for students with special needs, which also included financial support, sign-language interpreters, and personal assistants for students with mobility impairment.

In University D the student support services are not so developed as in the other two Portuguese universities. At the university level there is a structure that deals, for example, with students with special needs: "our staff supports such students in the beginning of the academic year, and together they identify strategies that could help the student" (Pt_Uni#4). The main role of this support service is to assist both the student and the teacher so that it enhances students' learning experiences. This university also has an institutional fund for scholarships addressing low-income students, welcomes students from East Timor and other Portuguese-speaking countries, and provides meals vouchers, reduced accommodation, and part-time jobs for students in need, as well as counselling and psychological services (Pt_Uni#4).

7.4.2.3. Romania

A student senate representative in University F (member of ANOSR – one of the national student alliances) who is also a representative of the ethnic Moldovan students at her faculty stated that their structure focuses intensively on student representation: "we greatly emphasize the rights and obligations of the students, we try to identify the problems students are facing, to come up with improvements, in other words, to make sure there is equity among students" (Ro_Uni#7). Students' opinions are considered if students are able to come up with good arguments based on procedures and internal rules: "we have a lot of support from

ANOSR; they share with us their expertise on our matters and this is how changes occur. Moreover, they have taught us about the BP, the national HE system and European trends" (Ro_Uni#7).

In University F, a student organization implemented a project specially dedicated to disabled students that combined social activities and information sessions about university life: "it is very difficult to set up a direction within the social inclusion area given that there are no resources for dealing with it. It is useless to say that it is very beautiful and nice to widen participation when you have a low number of potential candidates from the pre-university sector" (Ro_Uni#11).

University H provides several opportunities for student representation including a student prefect, an ethical commission, the university senate and administrative council, a scientific council, and faculty- and program-level representatives. Here, two types of student representatives have been interviewed. Effective student representation remains an issue of student preparedness and motivation (i.e., at University H, students receive a 75 % accommodation discount) and knowledge about national and internal educational matters: "we have a governmental decision that says scholarships should be also given during the summer period, but it does not say from which money. Here it is up to you as a student representative to convince the university to find solutions to the issue" (Ro_Uni#18). Students' power lies in their numbers. One interviewee was a president of a non-governmental student organization (Ro_Uni#17) whereas another was part of a university-wide structure focusing on student representation (Ro_Uni#18). In the university senate there are around 25 students: "it is up to us to get aligned and speak with one voice. The senate takes into consideration the fact that students can 'mess things up a lot,' especially about teachers" says a student senate representative and member of the administrative council (Ro_Uni#18).

University H has an internal strategy that aims to reduce dropout: "this is not just because of social and financial problems, but also bullying and other types of risks. We have centers that are dealing with such cases, but the people working there are often changing positions and students do not use these programs" (Ro_Uni#20). The university has a social office (more administratively focused) and provides different types of student support services including psychological counseling, psycho-educational support, and career counseling.

University F has an institutional policy of having budgeted places for disabled students and other special categories: "we aim to attract them in a serious way" (Ro_Uni#5). For students with visual impairment and other disabilities, the university provides appropriate support including courses in sign language. The university has been recognized as one of the

most accessible public institutions by the city. The interviewed Vice-Rector revealed future plans for developing a new structure dealing with educational and research support for persons with special needs. One of the professors at University F observed a tendency toward inclusion in the university, especially with regard to students with disabilities (Ro_Uni#3). At the hard sciences faculty, however, the situation is different: "we do not have disabled students, not that we do not accept them - I think they do not feel able to cope with the activities this field of study involves (i.e., experiments)" (Ro_Uni#4). University F used to have a tutoring program for first-year students that included both academic and social integration components (i.e., finding accommodation, job searching). With regard to outreach activities, it was stated that they are not held just in the city but in the surrounding area and the professors engaged in these activities realize that "the students who come to us are not rich; the rich ones go to medicine, law. We tell them we have different types of scholarships and that they can be complementary (i.e., the same student can benefit from both merit-based and social scholarships), that we can help them find part-time jobs, that we offer accommodation" (Ro_Uni#4).

7.5. Conclusions

Table 15 provides a summary of the main findings with regard to practical implementation. The table uses a point scale from 0 to 4 (0 - Not at all important, 1 - Slightly important, 2 - Important, 4 – Very important) to indicate the extent to which the factors under observation matter in university level policy implementation.

Table 15. Practical implementation - summary findings

Factors influencing adoption	Degree of importance	Context
P1. Institutional leadership, priorities and higher education institutions' autonomy	Very important	Top management teams within universities enact QA and SD policies due to the regulations universities have to comply with and their internal preferences as shaped by their operating environment.
P2. The associated capacities and resources for implementation and implementers' discretion and familiarity with the goals of the policy	Very important	Even though from a procedural point of view universities implement QA and SD policies, the implementation responsibilities contribute to the depth of behavioral change needed to achieve the intended of those policies.

Institutional autonomy has proven to have mixed relevance with respect to QA and SD policies. Indeed, institutional leaders and their managerial teams have a variety of choices when it comes to approaches within and beyond their national contexts. While some of them become institutionalized practices as a result of projects of mimetic transfer, some are legally required

from universities. Institutional autonomy is manifested differently in the HEIs under consideration: most of the times, in Moldova universities expect the government to take a stand and then act in accordance. In Portugal, universities make the most of their autonomy, but they are constrained by resources to expand their range of activities. In Romania, autonomy comes with greater public accountability and just courageous universities step up.

When it comes to QA policies HEIs react to such policies from two main perspectives. On the one hand, the national QA legislation is adjusted to the BP because such policies provide legitimacy to the national HE system and certify its quality. In this case, from a procedural (formal) point of view HEIs follow both national and BP frameworks. On the other hand, as shown in section 7.3.2., top HE management engages in different organizational socialization practices which provide opportunities to learn from each other and exchange practices and ideas with the aim of encouraging implementation and shared practices. Once part of these socialization practices, participants and representatives use the acquires knowledge and information to legitimize decisions institutional level (or the more content related component). The latter aspect has been materialized through the early stage policies universities had with regard to European and BP policy trends.

As far as the EGSs implementation is concerned, a common pattern emerged among the universities under consideration. Institutional practices are adjusted and updated when institutional or program level QA evaluations are conducted. On the one hand, quality performance is perceived to contribute in attracting students, which is then being translated into governmental funding. On the other hand, excelling or maintaining high quality standards is also a matter of institutional pride (i.e., naming and shaming). Even though supranational pressure is not a strong component within the BP, through QA agencies and structures at the national (national QA agencies) and European level (i.e., the EUA) the desired effect of compliance with the agreed QA policies is created. Institutional level implementation arises from policy standards and discourses about quality educations, excellence, indicators and benchmarks for assessing QA progress (i.e., periodic monitoring, evaluation and peer reviews). While in some countries and HEIs this the type of monitoring and enforcement system matters, it can provide perverse incentives as HEIs comply formally with QA requirements.

The ESGs requiring a regulation, or a procedure are more present since such instruments are more static – meaning once a policy is in place no constant adjustments are needed. Another observation relates to the fact that those HEIs which have had an institutional evaluation recently (in the last year or two) are less prone to update their internal policies and procedures. This can be also related to the monitoring and evaluation mechanism enforced by

the QA agencies that incentivizes the HEIs to perform as expected. When it comes to making information available, the situation is constantly changing and it requires the input of lower-level administrative units for the collection and analysis of data. For the specific standards of student admission, progression, and certification, most HEIs have mainly admission regulations because state-level financing requires such procedures and transparency.

In some of the countries the teaching profession is highly regulated at the national level and there is little flexibility for further HEIs' internal regulations on the academic career. A national issue in Moldova referred to the lack of human resources within the academic sector, with the younger generation of professionals looking for professional development opportunities outside the country and ageing population of professors (Md_Nat#2). In Portugal, professors have the status of public servant and are subject to national regulations (i.e., during the fieldwork in Portugal concerns have been shared about the Government's decision to freeze salaries and promotion opportunities for academics as an effect of the economic crisis).

With regard to the SD, as stated in the previous chapters, none of the countries under consideration has a national-level framework or national wide comprehensive program on the SD. Instead, they have different pieces of legislation targeting social-specific issues of the HE system (i.e., social scholarships in Moldova, special admission systems in Portugal, or career and counselling offices in Romania). HEIs, in the absence of a binding dimension of these policies or strong incentives (i.e., financial ones) can disregard these policies. Instead, given their autonomous character, HEIs can take on board different types of practices depending on their preferences.

The case of the SD reveals a contrast between it and QA policies. SD policies at the institutional level are not so much procedural but more content oriented (i.e., programs, services). While some institutions perceive SD policies as institutional principles and values (i.e., equity fair treatment) other perceive it as a mechanism to balance meritocracy, widen participation and attract more students. Moreover, the way SD policies are dealt with within universities portrays the institutional stand and the perceived institutional responsibilities. Most of the HEIs under consideration, through their leaders have taken on board a variety of SD policies and made intensive use of administrative units in charge of logistics, infrastructure and general services. With few exceptions (i.e., the special needs or disability offices) HEIs engaged in psycho-educational dimensions of the SD. Universities also expect student organizations and structures to take the lead in SD matters. While this is a legitimate position, it shifts the responsibility away from the institution.

Reflecting on whether implementers familiarity with the goals of the policy and its perceived added value influences implementation it can be stated that this is highly connected with the characteristics of the policy and the monitoring and enforcement system. If in the case of the ESGs most of the interviewees at the institutional level were familiar with the specific BP jargon and vocabulary, in the case of the SD interviewees have had a narrow understanding of it and institutional policies were more context dependent. When it comes to internal communication within universities, a common feature has been identified across all universities under consideration: the communication mechanism used most often was electronic mail (i.e., listserv with mass emails). This poses several challenges. First, this is a one-way communication method, with little reaction or feedback to what is communicated within the university. Second, the communicated information might not reach different units within the university equally. Since there is no mechanism to ensure people (staff and teachers) have read and understood what is communicated and what they are required to adjust in their daily institutional practices. The quality of communication contributes to hampering the emergence of the quality culture most interviewees referred to as a highly- needed component in the academic context.

Conclusion and Contribution

This dissertation aimed to address the implementation gap in the study of the Bologna Process. For this, it proposed to view the BP as a transnational, voluntary HE policy framework. Besides the immediately practical interest in studying the implementation of the BP as a major reform program relevant for the entire Europe, this dissertation also addresses broader methodological and theoretical aspects of HE policy implementation.

Established 20 years ago as a voluntary cooperation initiative on HE cooperation in Europe, the Bologna Process has set important policy objectives for national HE systems and Europe at large. While government representatives, through the ministerial meetings constantly agree on behalf of all member countries what they should implement the same commonly agreed set of objectives in their national HE system, implementation reports show extensive differences between countries and HEIs. Although the BP structures have taken steps to address the existing implementation gaps (i.e., more working groups on implementation, projects on enhancing the implementation of different policy areas lagging behind etc.) there are still major national differences with regard to the degree of integration towards a common, attractive and competitive European Higher Education Area. Starting with the early stages of the BP the scholarly interest in studying the different dimensions of BP implementation has increased progressively. This considerable and growing number of these studies has focused mainly on assessing and explaining scattered aspects of BP implementation. There is a clear gap in the literature in addressing the implementation of the BP from an integrated perspective. This dissertation aimed to fill this gap and asked *What are the factors explaining the different levels of implementation of higher education policies within the Bologna Process?*

In order to answer this question the dissertation (1) built an analytical framework for HE policy implementation which goes beyond the nation state; and by (2) took a longitudinal approach to explaining implementation of IVAs in HE by looking at the BP, national and institutional level dynamics.

The analytical framework proposes an innovative conceptual understanding of policy implementation in a multi-level governance context. It differentiates amongst three stages of implementation, namely: *adoption*, *transposition*, and *practical implementation*, corresponding to different levels/degrees of implementation at the national and institutional level. The framework draws upon existing implementation theories, EU integration studies and HE policy studies (i.e., multi-issue, multi-level and multi-actor dynamics of the BP - Chou et al., 2017). It helped to formulate a set of immediately relevant hypotheses, including with

regard to the factors affecting each of the three implementation levels. The framework has been tested in this dissertation with regards to two policy areas within the BP (QA and SD); in three different country contexts; and in a set of universities within each of these countries (Moldova – two universities, Portugal – two universities, and Romania – three universities) through a set of 68 semi-structured interviews. Testing the proposed framework and the corresponding factors reveals the following picture.

The framework led to the hypothesis that *adoption* can be a result of several factors among which:

(1) Participating countries' (or national representatives) meaningful participation in BP policy-making processes between the ministerial conferences, and their bargaining power in putting on the BP agenda issues they consider relevant for their national HE context;

(2) The incorporation of implementation actors and target groups into the decision-making processes at the BP level and their support in pressuring top decision-makers to back up their commitments;

(3) Governments' preferences with regard to the BP commitments;

(4) The characteristics of policy to be adopted, its degree of complexity, fit and clarity

The findings show that both the normative and instrumental motivations for joining the BP were important factors to further reform. The three countries under consideration had little upload onto the BP agenda. These countries did not have strong preferences that could be uploaded onto the BP agenda, nor did they heavily bargain for certain policies. It was found that in terms of QA policies, the transnational organizations in the field of QA and SD provide different types of incentives to national level structures to further propose such in-line policies to be adopted by top policy-makers. For both QA and SD policies it became clear that the support of domestic actors who also participated in BP-related activities and structures contributes to bringing national policies closer to the ones promoted by the BP. For HE policy, national governments and political actors act as gatekeepers through which key decisions become nationwide policies. The extent to which the type of government matters is an issue of government stability, approach to policy making (top-down, bottom-up), but also ideology (on the political spectrum). Legislative initiatives of any type require time until they are adopted (i.e., proposed by different interest groups, supported by policy makers, debated, adopted by different chambers of the Parliament, etc.). Finally, the characteristics of the BP policies to be adopted matter. For the specific case of QA, in all three countries decision-makers considered there is a need for clear evaluation processes. QA policies were seen as solutions to existing

challenges and issues. While in the case of QA policies can be stated that existing instruments facilitated national level adoption, in the SD case this did not apply to the countries under consideration. It was revealed that SD policies require extra resources, and at the same time, they are not considered top priorities for national governments.

Further, the framework hypothesized that *transposition* can be a result of several factors among which:

(1) National representatives' meaningful participation in policy-making processes both at the BP level and at the national level;
(2) The organizational socialization processes governmental agencies, structures and the academic community participate in;
(3) The decision-making authority, discretion and capacity implementing organizations have with regards to the concerned policy;

The findings show that national representatives' participation in the BFUG, WGs and national policy-making processes present mixed realities in the three countries under analysis depending on the system of delegation. This is compensated by the different experts and structures at the national level which contribute in providing firsthand input to top decision-makers as a result of their ideational motivation interest, or 'stake' in a given policy sector. HEIs remain important actors but without common, strong bottom-up advocacy efforts. Depending on their capacity and level of information student participation the formalization of students' participation in BP governance and national level structures has allowed students to play a proactive role in defending their rights and supporting national level policy makers. With regard to the socialization processes stakeholders are engaged in, it was revealed that transnational structures like the EUA, ENQA and ESU (and other participating countries) are influential in the propagation of specific policy measures by providing participants with ideational and material support to address specific BP policy goals. In the case of QA transposition was a direct result of QA agencies procedural regulations and legislative initiatives as a "pressure" to adjust to BP standards.

Finally, the framework hypothesized that the *practical implementation* phase can be a result of:

(1) HEIs' autonomy, institutional leaders' priorities and the associated capacities and resources for implementation;
(2) Implementers familiarity with the goals of the policy and its perceived added value, considerably influences implementation;

Institutional autonomy has proven to have mixed relevance with respect to QA and SD policies. When it comes to QA policies HEIs' leaders react to such policies from two main perspectives. On the one hand, because of the national QA legislation which is adjusted to the BP. On the other hand, top HE management engages in different organizational socialization practices which provide opportunities to learn from each other and exchange practices and ideas with the aim of encouraging implementation and shared practices. Most of the HEIs under consideration, through their leaders have taken on board a variety of SD policies and made intensive use of administrative units in charge of logistics, infrastructure and general services. The resources associated with SD policies pose implementation challenges at the university level. Reflecting on whether implementers familiarity with the goals of the policy and its perceived added value influences implementation it can be stated that this is highly connected with the characteristics of the policy and the monitoring and enforcement system. If in the case of the ESGs most of the interviewees at the institutional level were familiar with the specific BP jargon and vocabulary, in the case of the SD interviewees have had a narrow understanding of it, and institutional policies were more context dependent.

To reflect on the overall findings the following can be stated. First of all, the framework contributes in highlighting the complex relationship between the BP, national, and institutional policy-making and the importance of national and institutional (interest) structures, actors (coalitions) and processes in connecting these levels. While it is assumed that that there is a "filter" when it comes to the implementation the BP commitments, with each level and layer of policy-making preconditioning the following (adopting the necessary legislation, transposition and institutional practices) this dissertation has shown that this is very much dependent on the policy in question. QA is a rather structural and technical area, with clear conceptualizations and operationalizations, with structures and bodies at the European, national and institutional level, whereas the SD is underdeveloped in this respect. HEIs implement QA policies because of the competitive environment they have to operate in but also because of the existent monitoring mechanisms (at the institutional, national and BP level). The SD is a rather sensitive area, with most of the universities putting forward their preferred approaches on how to deal with such issues. If in the case of QA in most of the country cases there is a national level agency which pushes for implementation at the HEIs level, in the case of SD the situation is loose.

This dissertation's final aim was to reveal the extent to which HEIs react to national and BP policies provided their autonomy and institutional preferences. Looking more broadly at HEIs participation within the BP it can be stated that their participation is rather minimal

and their engagement with the BP usually takes place through transnational structures rather than the national level delegations and structures. This poses further challenges for implementation since HEIs become "passive" recipients and targets of national and BP policies despite their agentic capacities.

One of the questions that emerged after examining the existent literature on the potential factors explaining the implementation of the BP was to what extent those factors hold across policy areas, HEIs, and country contexts to explain the implementation of multi-level voluntary initiatives in higher education. Depending on the assigned responsibilities and roles of different actors and structures within the national higher education policy-making context, the proposed framework structured the factors affecting implementation in multi-level clusters. The findings show that the proposed factors provide useful insights in exploring implementation yet the context of their operation might differ in various contexts. The framework can be enhanced by exploring further dynamics within each of the three implementation levels (e.g., parliamentary commissions of education) and by testing different BP policy areas, country and university contexts.

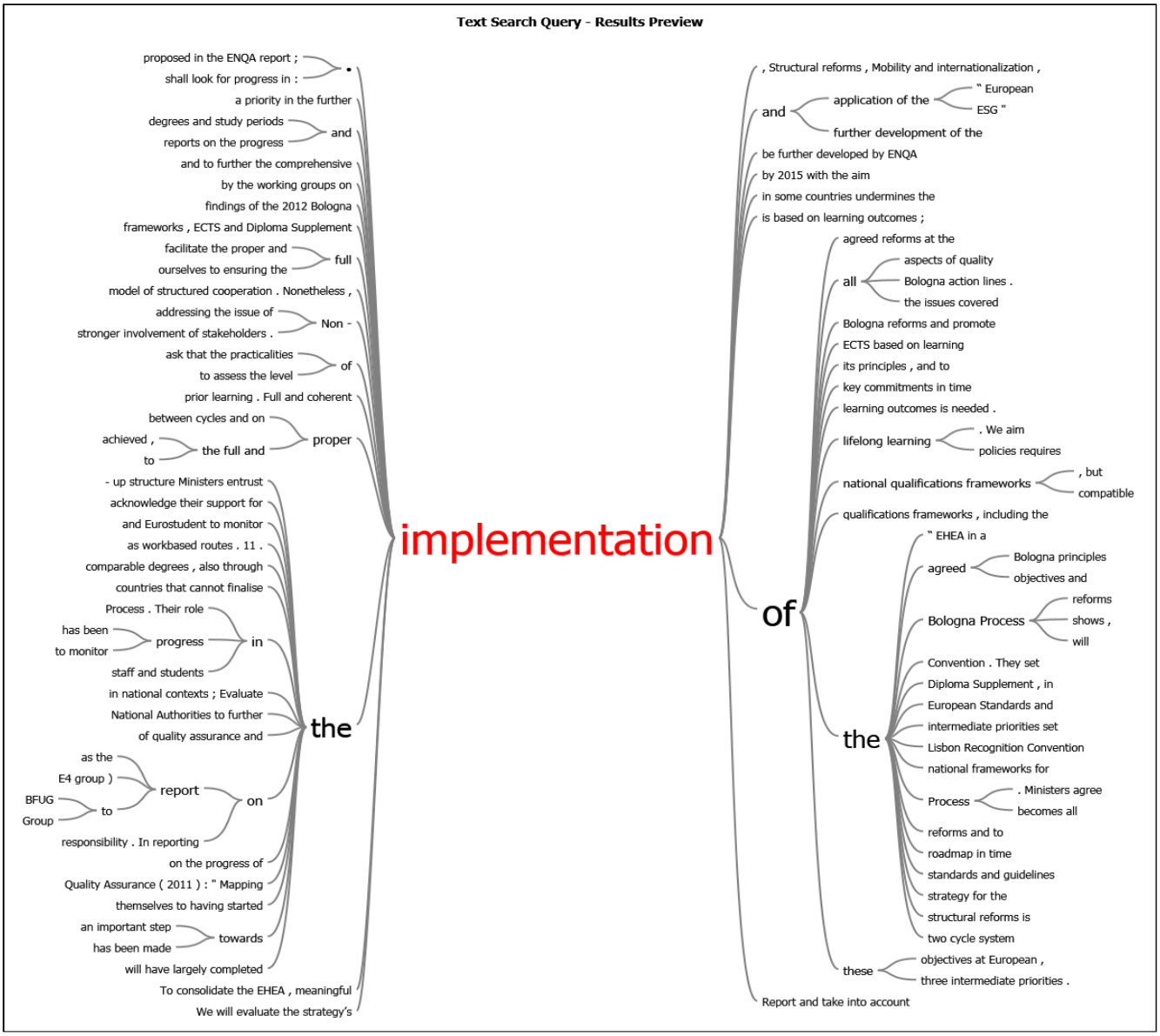
To summarize, in its entirety the proposed framework proves to be an effective tool for structuring multi-level higher education policy implementation. Although, the current framework presents the BP policy model as a top down process – in which supranational structures set the agenda, formulate policies, monitor and evaluate performance; national structures adopt, transpose and implement the agreed policies - it embeds both policy uploading and downloading. The policy download (vertical policy transfer) is mainly due to the involvement of supranational structures and different countries' stake in the policy issue, whereas the policy upload refers to the involvement of each country to contribute to the broader BP agenda setting (through ministers participating on the ministerial conferences, country delegates in different BP structures, or even regular attendees in the BP related activities). Besides, given the flexibility of the system, countries, deliberately or not, take part in what is known as the horizontal policy transfer - which incorporates learning from and taking on other participating countries policies with or without the direct involvement of the BP structures (WGs, Secretariat, etc.). Moreover, the multilevel aspect of the BP policy model in not only supranational, national and institutional in *stricto sensu*, but acknowledges that within each stage there are internal dynamics, clashes and frictions when it comes to HE policy-making.

The proposed framework contributes to the policy implementation field by using HE policy as a specific policy area. Besides the more scholarly intended contribution, the policy relevance of this study stands in its potential of explaining the unbundling of HE developments

beyond the national HE systems. For the HE research world, this dissertation makes a contribution to the field by moving away from the fragmented approach towards implementation (i.e., focusing on formal adoption only) or BP's convergence potential for the participating countries, to analyzing implementation in a systematic way: from the supranational, to the national and institutional level. At the macro level level, this dissertation goes around analyzing cooperation between states and their compliance with soft law policies. It also touches upon policy-making in a complex setting (European, national and institutional level) in an area where EU competencies are limited. The potential contribution of this research stands in the fact that it can provide insights into similar HE initiatives in other parts of the world such as ASEAN or MERCOSUR, but also in soft law policy areas within the EU (i.e., social policy) or intergovernmental voluntary agreements (i.e., GATS, OECD, or the EU Strategy for the Danube Region). This research has the potential to inform HE policy makers about why member states act, or fail to act, in line with the objectives of the BP, and therefore will enable policy-makers to design better policy interventions and help BP policy-makers, actors and stakeholders make more informed policies in the future.

Annexes

Annex 1 – The implementation of the Bologna Process as portrayed in the ministerial declarations and communiqués



Annex 2 – List of interviewees

No.	Code	Interviewee (former) position(s)
1.	Md_Nat#1	Former student representative at the national level, former higher education expert
2.	Md_Nat#2	National QA agency representative, former University level QA structure representative
3.	Md_Nat#3	National level youth representative, university level student representative
4.	Md_Nat#4	Ministry of Education representative, former civil society representative (in education), BFUG and WGs delegate
5.	Md_Nat#5	Former student representative at the national level, civil society representative (in education)
6.	Md_Nat#6	Ministry of Education representative
7.	Md_Nat#7	National level youth representative, youth policy expert, former university level student representative, ESU QA student evaluator
8.	Md_Nat#8	Student representative at the national and university level
9.	Md_Uni#1	Student representative at the national and university level
10.	Md_Uni#2	Academic, former student representative at the national and university level, politician, national QA agency member
11.	Md_Uni#3	University representative (top manager)
12.	Md_Uni#4	QA president of QA Commission Faculty of Philosophy and History USM
13.	Md_Uni#5	University level QA structure representative
14.	Md_Uni#6	University level QA structure representative
15.	Md_Uni#7	University level QA structure representative at the faculty level
16.	Md_Uni#8	Administrative staff on student affairs and services
17.	Md_Nat#9	Equality expert, civil society representative (in education)
18.	Pt_Nat#1	Former BFUG delegate, former university representative (top manager), national higher education expert
19.	Pt_Nat#2	Student representative at the national level
20.	Pt_Nat#3	Former BFUG delegate, former university representative (top manager), national higher education expert, academic, QA agency representative, former state advisor on higher education
21.	Pt_Nat#4	Former BFUG delegate, former university representative (top-manager), national rectors' council representative, national QA agency external evaluator
22.	Pt_Nat#5	Former student representative at the university and national level
23.	Pt_Nat#6	Ministry of Education representative
24.	Pt_Uni#1	Staff member, student services officer
25.	Pt_Uni#2	Student representative at the university level
26.	Pt_Uni#3	Academic, member of the university senate, student services officer
27.	Pt_Uni#4	University level QA structure representative
28.	Pt_Uni#5	Staff, university level QA structure representative
29.	Pt_Uni#6	Student representative at the university level
30.	Pt_Uni#7	Student representative at the university level
31.	Pt_Uni#8	Staff member, student services officer
32.	Pt_Uni#9	University level QA structure representative
33.	Pt_Uni#10	Academic, national higher education expert, national QA agency representative
34.	Pt_Uni#11	Staff member, student services officer
35.	Ro_Nat#1	Former BFUG delegate, WGs delegate, higher education expert, former student representative at the national and European level
36.	Ro_Nat#2	Former BFUG delegate, WGs delegate, higher education expert, public servant, former student representative at the national level

37.	Ro_Nat#3	Former BFUG and WGs delegate, higher education expert, public servant, former student representative at the national level, civil society representative (in education)
38.	Ro_Nat#4	National QA agency representative
39.	Ro_Nat#5	Former national QA agency representative
40.	Ro_Nat#6	National higher education expert, former Minister of Education
41.	Ro_Nat#7	Student representative at the national level, and evaluator in the national QA agency
42.	Ro_Nat#8	Student representative in the national QA agency council, student representative in the university senate, former national level student representative
43.	Ro_Uni#1	University representative (top manager), former BFUG delegate
44.	Ro_Uni#2	University level QA structure representative
45.	Ro_Uni#3	University level QA structure representative
46.	Ro_Uni#4	University level QA structure representative
47.	Ro_Uni#5	University representative (top manager), national QA agency council member
48.	Ro_Uni#6	University representative (top manager)
49.	Ro_Uni#7	Student representative at the university level, student representative at the senate level, beneficiary of state quota
50.	Ro_Uni#8	Student representative at the university level, minority student
51.	Ro_Uni#9	University representative, academic and staff member
52.	Ro_Uni#10	University level QA structure representative, former senate commission member on student issues, faculty level president of the QA commission
53.	Ro_Uni#11	Staff member, career officer, higher education expert, former student representative at the university level, former BP secretariat member
54.	Ro_Uni#12	Academic, national higher education expert, former student representative at the university and national level, former BP secretariat member and collaborator for the national QA agency
55.	Ro_Uni#13	Dean, national higher education experts
56.	Ro_Uni#14	University level QA structure representative, evaluator for the national QA agency
57.	Ro_Uni#15	University level QA structure representative
58.	Ro_Uni#16	University level QA structure representative
59.	Ro_Uni#17	Student representative at the university level
60.	Ro_Uni#18	Student representative at the university level, student council member, senate member, civil society representative (in education)
61.	Ro_Uni#19	Academic, member of the faculty level QA commission, national higher education expert
62.	Ro_Uni#20	University representative (top manager)
63.	Europe#1	Student representative at the European level
64.	Europe#2	Former Ministry of Education representative, former WG delegate
65.	Europe#3	National level student representatives (group interview 4 people)
66.	Europe#4	National QA agency representative
67.	Europe#5	Former WG delegate, higher education professional, and social dimension expert
68.	Europe#6	National level student representatives (group interview 4 people)

Annex 3 – Interviews protocol

Implementation stage	Interview target	Questions
Adoption	Ministry of Education representatives, BFUG delegates, WGs delegates, international actors and stakeholders	• Why country X joined the BP? What it meant for country X to join the BP? What is the general perception about the BP? How familiar people in academia are with it? How your country has been involved in the BP governance and what it meant for uploading specific policies on the BP agenda? • What is your role with regards to the BP policies? Who participates in the ministerial conferences? Who participates in BP WGs? Were the national representatives involved in defining the agenda? What were their stands with regards to certain policy issues? Was the policy clearly (further) communicated to lower implementation levels? What are the tools at the supranational BP level to enhance top-down communication? • Can you describe the decision-making process in the ministerial conferences? Can you describe your experience in the WGs? • What were the main directions of higher education reform at a certain point in time? And how these goals changed over time? Was there a variation across government/ministers of education with regards to BP implementation? How laws at the national level reflect the objectives and recommendations formulated within the BP? Who had the final say in the adoption stage? • What laws and decisions have been adopted with regards to QA and SD policies? How these relate to existing policies at the national level? Who has been involved in the preparation of these laws and on what grounds? What were the practices/models you got inspired from? Who (which actor) had the greatest influence/power in determining the content and shape of the reform? Who proposed, supported or opposed an initiative? What were the arguments?
Transposition	Governmental agencies, national rectors' council, national student unions, higher education experts, youth policy experts, equality experts, interest groups, civil society representatives	• What tools/instruments (including agencies) have been developed for facilitating the implementation of specific QA and SD policies at the national level? What are the main aims and responsibilities of those agencies/institutions in charge of overseeing the policy implementation process? How effective/functional/active are these institutions? What activities do you know about or have been carried out by these structures? Have you taken part in any meeting or activity organized by them? • What were the steps for achieving the intended goals of the policy? How the implementation of specific QA and SD policies was envisioned? Who has been consulted and on what grounds? Were the existing structures competent enough to deal with it or new structures were needed? How do you perceive certain structures and actors with regards to QA and SD policies implementation? What programs they have developed by now and what are the results of their activities? Who decides on action plans and projects, and how? • Are there any available (financial and human) resources for creating a pool of common sense and understanding across parties with regards to those policies? Are there any available (financial and human) resources for creating a pool of common sense and understanding across policy

		targets? What are main challenges and opportunities in implementation?
Practical implementation	Rectors, top-managers, staff and administrators, heads of departments, university level student organizations	• Is there an institutional strategy, plan at the institutional level? How it came into place? • How decisions are made within your institution? Can staff, students and teachers mobilize for supporting/resisting certain changes? What is your role in these processes? From where you get inspired from? Who communicates and how policy developments? How you further communicate policy developments to faculties/ departments and students? • Was the policy needed/required at the university level? Was it imposed or highly supported by academics when adopted at the national level? What was the rationale for having it? Were there any incentives? Who advocated for it? Who resisted it? Was there an existing policy on the issue? • Does the university have the freedom and autonomy to (not) comply? Is there a need (as perceived by universities) for adapting? How much flexibility/ discretion you have? How is autonomy demonstrated in your university? • Does the policy require new structures/agencies/ human resources in order to be implemented? What resources have been made available? Are they enough? Who are the international, national and local actors with whom you collaborate/work with on this policy? • Who is in charge for the implementation and monitoring? How is the policy monitored, and what are the different levels of reporting? What are the challenges?

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