University Austria (uniko) is herewith complying with the invitation to comment on the EUA proposal on the continuation of the Bologna Process.

On a positive note it should be highlighted that the document addresses, under point 4 (Support and protect university values), the protection of institutional autonomy and academic freedom as well as of fundamental rights as a prerequisite for teaching and research. Universities Austria endorses this view and emphasizes that all other goals of the Bologna Process can only be achieved if these preconditions are guaranteed.

As early as in 2018, Universities Austria presented some fundamental ideas on the future of the Bologna Process in a position paper¹ and called for a reorganisation of the process. The following key points should be considered in any such reform:

- Lean coordination at a higher political level favouring an active role of higher education institutions;
- Focus on some central areas and their implementation by evaluation and promotion measures;
- Monitoring reports at five-year intervals and their evaluation within the framework of a strategic meeting at political level instead of ministerial communiqués in the present form, and reduction of the hardly manageable (sub)working groups and framework papers which result therefrom;
- Promotion of “ideas labs“ to develop relevant themes which are closely oriented towards university practice and can deliver input in a scientific and creative/innovative manner,

¹ See “The Future of the Bologna Process”
https://uniko.ac.at/modules/download.php?key=18226_EN_O&f=1&jt=7906&cs=C562
lean and responsive organisational forms instead of complex, centrally steered and administrative working groups.

These points are not sufficiently reflected in the present position paper of EUA. The EUA proposal is consistently formulated from the perspective of BFUG and continues to see it as a hub for all activities. The mere inclusion of more input from national networks and projects in BFUG (see proposal 3 *Promote greater active involvement of the HE sector*) will not lead to stronger “ownership” of higher education institutions, but simply perpetuate existing structures.

Point 6 (*Improve governance*) seems particularly problematic and even goes in the opposite direction: Establishing a permanent central secretariat would add to the administrative structure and consolidate the top-down approach which actually further weakens the participation of universities instead of strengthening it in a sustainable manner. Universities Austria therefore rejects this idea. The required funding should rather be resourced in calls for tenders for decentralised initiatives (see ideas labs) for which higher education institutions may apply and which they should carry out as project leaders.

Universities Austria is therefore calling on EUA as representative of higher education institutions to represent also their perspective and ensure that they are given a central role in the future design of the EHEA.