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IMPLEMENTATION OF BELARUS ROADMAP FOR HIGHER EDUCATION REFORM IMPLEMENTATION OF BELARUS ROADMAP FOR HIGHER EDUCATION REFORM

6TH MONITORING REPORT (MAY-OCTOBER 2017)

Prepared by the Belarusian Independent Bologna Committee
and the Ad Hoc Committee of the Belarusian National Platform
of the Eastern Partnership Civil Society Forum

According to the timeline of the Belarus Roadmap for Higher Education Reform implementation, by this time, Belarus should have fulfilled all its obligations. However, as for the terms established by the Roadmap, the Belarusian authorities are far from the fulfillment of the overwhelming majority of these obligations.

The monitoring of the Roadmap implementation demonstrates that none of the obligations assumed by Belarus in 2015 is fulfilled completely and on time.

After analysing the level of Belarus' implementation of the most socially significant requirements of the Roadmap, we have to acknowledge that out of the list of the changes most expected by the public only the following Roadmap requirements are carried out or are planned to be implemented:

- Bologna architecture of higher education - transition to three cycles: bachelor – master - PhD, and*
- issue of the Diploma Supplement automatically and free of charge.*

All the other obligations:

- introduction of the National Qualification Framework*
- creation of the Independent Quality Assurance Agency*
- changes in the current system of mobility permits, to allow for longer periods of mobility within EHEA for both staff and students without ministerial approval*
- withdrawal of the existing practice of graduate work placement*
- overcoming of the discrimination of students of private higher education establishments when it comes to granting them financial aid (soft loans)*
- guarantees of academic freedom and expansion of institutional autonomy, including widening of students' participation in management of higher education establishments*
- providing the students and faculty members with the right to establish and register organisations freely, in particular – to abolish Article 193.1 of the Criminal Code*

are not fulfilled; their implementation is not provided by any projects of legal acts.

Thus, out of nine of the Roadmap obligations, which are societally significant, only two can be implemented by the Belarusian authorities if the new Education Code is adopted by May 2018. However, this is an unlikely development as the transfer of this bill to the National Assembly is postponed without day.

There is lack of progress in those areas that initially were of great concern to the EHEA members. These issues were behind excluding Belarus accession to the EHEA from the agenda in 2012.

In order to preserve the Belarusian higher education reform vector, the EHEA members have to be persistent and coherent in their approaches to Belarus' implementation of the Roadmap obligations, adhering to their principles while evaluating the introduction of fundamental academic values into the Belarusian legislation and practice.

In view of the current state of affairs, it is proposed to extend the Roadmap implementation timeline for 2-3 years and to maintain international control over its implementation.

Implementation of the Roadmap requirements as of 1 October 2017.

Structural reforms

Qualifications framework

- ***Commit to developing a National Qualifications framework compatible with the QF-EHEA.***
- ***Commit to establishing a timetable for this work and to identify a national steering group by the end of 2015 and to launch work on the NQF in the first half of 2016.***

Legislative, statutory-regulatory, and methodological frameworks, information support

The [legal basis of the higher education system](#), regarding the creation of the National Qualification Framework (NQF), higher education architecture, and other Bologna tools of providing transparency, is still the legislative and statutory-regulatory acts, as well as other standard-methodical and regulatory documents, which were developed in 2011-2015; there are also individual documents that, basically, establish separate educational standards of higher school, which were generated on the basis of old models of the 2011 educational standards (2nd step of higher education) and the 2013 ones (1st step of higher education).

These are Decisions of the Ministry of Education of the Republic of Belarus confirming educational standards of higher education of 1st Degree (d/d February, 3rd, 2016 №7; d/d May, 30th, 2016 №42; d/d July, 8th, 2016 №65; d/d July, 25th, 2016 №68; d/d July, 25th, 2016 №69; d/d August, 11th, 2016 №79) and Decisions of the Ministry of Education of the Republic of Belarus confirming educational standards of higher education of 2nd Degree (d/d February, 8th, 2016 №8; d/d May, 25th, 2016 №40; d/d July, 18th, 2016 №67; d/d August, 23rd, 2016 №83; d/d September, 15th, 2016 №90; d/d September, 30th, 2016 №92; d/d September, 30th, 2016 №93; d/d October, 7th, 2016 №94).

There are: the web-site of the [Consultative Group](#) to support the Roadmap for the Republic of Belarus and the official web-site for projects of educational standards of higher education, standard legal acts regulating their designing and implementation, and results of their public discussions: «The national portal of projects of educational standards of higher education».

National Qualification Framework (NQF)

Belarus has done practically nothing at the legislation level to create the National Qualification Framework in 2015-2017.

Till now the only regulatory legal act dedicated to the national system of qualifications, which launched the process of its development, is Decision of the Council of Ministers of the Republic of Belarus d/d January, 17th, 2014 №34 «About some questions of developing the national system of qualifications of the Republic of Belarus».

This Decision launched a pilot project aimed at working out several professional standards, but had no further development in legal acts.

In the labor legislation (the Labor Code of the Republic of Belarus), as well as in the new project of the Education Code of the Republic of Belarus, not to mention the current Education Code, there are no mentions of the national system of qualifications, the National Qualification Framework, professional standards and related terminology and procedures.

In a number of decisions of the National Council of rectors of higher education establishments (Decision №1 d/d 16 June 2016 «About the formation and introduction of qualification frameworks, taking into account the introduction of the Republic of Belarus into the European Higher Education Area», Decision of Presidium №2 d/d 22 February 2017 «Formation of the National Qualification Framework to provide quality of higher education, its conformity with requirements of today's labor market»), in the letter of the Ministry of Education of the Republic of Belarus to higher education establishments (d/d 14 October 2016 №08-19/4097/ds «About the organization of the educational process in higher education establishments in the 2016/2017 study year»), there are words on the necessity to activate the working-out of the National Qualification Framework.

Thus, in the Decision of the Presidium of the National Council of rectors of the Republic of Belarus in February 2017 (№2 d/d February, 22nd, 2017), it is noticed that although a certain basis to work out the NQF is already created (educational levels according to ISCED 2011, their duration, transition conditions, and learning outcomes are defined, the council of rectors urges to speed up the work aimed at working out the NQF.

In particular, the council of rectors has called

«1. ... **the Ministry of Education of the Republic of Belarus** ...

1.1) to address to the Government with an offer to activate the working-out of the NQF;

1.2) to approve the project of the National Qualification Framework of higher education of the Republic of Belarus (BelQF) and to discuss it at national and international levels;

1.3) to confirm the plan of working out and introducing the National Qualification Framework of higher education of the Republic of Belarus (BelQF);

1.4) to define an order of support and actualization of the National Qualification Framework of higher education of the Republic of Belarus (BelQF).

2. ... the Ministry of Labor and Social Protection of the Republic of Belarus

2.1) while working out the national system of qualifications, to consider the National Qualification Framework of higher education of the Republic of Belarus (BelQF) approved by the Ministry of Education of the Republic of Belarus; ...

3. ... the National Institute of Higher Education and the National Institute of Vocation Education ...

3.2) to make offers to the Ministry of Education of the Republic of Belarus on the basic structural elements and quantity of levels of the national framework of the qualifications corresponding to EQF-LLL;

3.3) to develop and present to the Ministry of Education of the Republic of Belarus a plan of working out the National Qualification Framework corresponding to EQF-LLL (as an element of the national system of qualifications); ...

3.5) to organize a public-professional discussion of the developed projects of the National Qualification Framework of higher education of the Republic of Belarus (BelQF) and the National Qualification Framework corresponding to EQF-LLL.»¹

Thanks to open sources, it is known that the approximate plan of measures aimed at perfecting the national system of qualifications of the Republic of Belarus (2016-2019) was presented during a presentation and that it provides the following steps, which implementation is planned for the period from 2016 to 2019:

- «1. Introduction into the labor legislation of terms and concepts of the new model of the national system of qualifications (professional standard, NQF, skill level, etc.) - 2017
2. Working-out and coordination of the project of the National Qualification Framework of the Republic of Belarus and its preparation to be approved - 2017
3. Working-out and approval of regulatory legal acts regulating an order of working-out and approval of professional standards - 2017
4. Formation of a plan of working out and approving professional standards - 2017
5. Working-out and approval of regulatory legal acts regulating an order of recognizing results of informal education, evaluation, and certification of qualifications - 2017-2018
6. Introduction of modifications and additions into the educational legislation of the Republic of Belarus regarding the system of professional qualifications, order of assigning qualifications, recognitions of results of informal education - 2017-2019.»²

However, there are no publicly open officially confirmed «Plan to work out and introduce the National Qualification Framework of higher education of the Republic of Belarus (BelQF)», «Plan to work out the National Qualification Framework corresponding to EQF-LLL», and «National Qualification Framework of higher education of the Republic of Belarus (BelQF)», mentioned in Decision of the Presidium of the National Council of rectors (№2 d/d February, 22nd, 2017), no «Approximate plan of measures aimed at perfecting the national system of qualifications of the Republic of Belarus (2016-2019)».

In November 2016, the Ministry of Education of the Republic of Belarus created a national working group to develop the National Qualification Framework consisting of 5 people (heads of the educational system and education establishments)³. No results of the work of this group are published.

On January, 25th, 2017, in the Ministry of Education and Science of Germany (Berlin, Germany), there was the 4th session of the Consultative Group of the Roadmap, during which, inter alia, the question «Working-out of the National Qualification Framework of levels of higher education of the Republic

¹ Decision of the Presidium of the National Council of rectors of Belarus №2 d/d February, 22nd, 2017 «Formation of the National Qualification Framework to provide quality of higher education, its conformity with requirements of today's labor market». <http://srrb.niks.by/>.

² Perfecting the national system of qualifications of the Republic Belarus: problems and prospects of introduction of the National Qualification Framework. – Presentation by Mironova T. N., director of the scientific research institute of the Ministry of Labor and Social Protection of Belarus. - 2016. http://www.ipg.org.ua/upload/files/files/o3_Novyny/2016.05.25-26_NQS_Belarus/%D0%9F%D0%A0%D0%95%D0%97%D0%95%D0%9D%D0%A2%D0%90%D0%A6%D0%98%D0%AF_%D0%9C%D0%B8%D1%80%D0%BE%D0%BD%D0%BE%D0%B2%D0%B0_%D0%9C%D0%B8%D0%BD%D1%81%D0%BA_2016.pdf

³ <http://aqz.bsu.by/ru/main.aspx?guid=4251>

of Belarus» was discussed and the project of the National Qualification Framework of higher education of Belarus was presented in the version of January 2017 in English⁴, which includes four levels, three of which (higher education, I cycle; higher education, II cycle (Master's degree program), and postgraduate study of I cycle (postgraduate studies or PhD programs)) in certain degree correspond to the Qualification Framework of the European Higher Education Area, and postgraduate study of II cycle (doctoral studies or Advanced Research Degree Program) has no equivalent in the EQF system. The Russian-language version of the project of the NQF of HE of Belarus has not been found in open sources.

There is no official information on stages and results of working out the NQF and professional standards. The information sources are still separate presentations and publications.

Conclusions

The absence of openness in the course of working out the NQF does not make it possible to reliably establish the degree of progress in the implementation of this requirement of the Roadmap. However, the current legislation and discussed bills allow us to conclude that this work has not left the frameworks of its initial stage and cannot be completed within the terms envisaged by the Roadmap.

Architecture of higher education

In the Belarus Roadmap For Higher Education Reform, regarding the transition to three-level system, it is said that in order to achieve the necessary results, Belarus will assume the following obligations:

As part of this work, commit to introducing the three-cycle system on the agreed Bologna model, establishing a first degree of 180 - 240 ECTS credits and consequently to gradually phase out the remaining 5 year bakalavr degree, and subsequently measure student workload in ECTS, as stipulated in the revised ECTS Users' Guide.

Legislation, regulatory legal acts, and standard-methodical support of higher education

In 2016, there were a number of actions that had to do with modernization of higher school and perfection of the contents of higher education. On 12 October 2016, there was the national round table «Implementation of EHEA tools in the national education system»⁵; on 30 November 2016 - the scientific-practical seminar «Pressing questions of working out educational standards of higher education of Generation 3+»⁶; on 13 December 2016 – the 4th annual Dutch-Belarusian-Polish conference «Education as human rights: higher education modernization in reply to the 21st century's challenges»⁷; on 30 March 2017 - the international seminar «Contemporary approaches in

⁴ <http://agz.bsu.by/ru/main.aspx?guid=4251>

⁵ <http://www.nihe.bsu.by/index.php/ru/novosti-instituta/1255-respublikanskij-kruglyj-stol-realizatsiya-instrumentov-evropejskogo-prostranstva-vysshego-obrazovaniya-v-natsionalnoj-sisteme-obrazovaniya>

⁶ <http://www.nihe.bsu.by/index.php/ru/upd>

⁷ <http://bolognaby.org/index.php/sobitiya/novosti/623-konferentsiya-obrazovanie-kak-pravo-cheloveka-modernizatsiya-vysshego-obrazovaniya-v-otvet-na-vyzovy-xxi-veka>

education-program contents of higher education»⁸. During these events, some changes in the project of the Education Code were presented⁹; questions of forming projects of a new generation of educational standards 3+, based on the competence approach, using results of education and ECTS¹⁰¹¹, as well as a new form of an annex to the diploma, which contents and structure correspond to the Diploma Supplement, were discussed.

On 09 March 2017, there was a round table of the Standing Commission on education, culture, and science of the House of Representatives of the National Assembly of the Republic of Belarus and the Ministry of Education that discussed a project of a new edition of the Education Code of the Republic of Belarus¹². However, nothing is known about the further destiny of the "long-suffering" Code.

In the Code project, there is an attempt to build a three-level model of higher education: there appear the terms "bachelor" [bakalavr] and "master" [magistr]; the term and definition of «doktorant» (candidate for a doctor's degree) is excluded from the existing Code; the following levels of higher education are introduced: Bachelor's program (bakalavriat; general higher education), Master's program (magistratura; profound higher education), and scientifically-focused vocational education (aspirantura; postgraduate studies), which is transformed from postgraduate study and which should correspond to the third cycle (doctoral studies) in the Bologna architecture of higher education, as well as the continuous educational program of higher education that unites preparation in bakalavriat and magistratura for separate specialties.

At the same time, in the Code project, it is underlined that «the educational system includes ... higher educational system, system of scientifically-focused vocational education, ...» that makes it possible to consider that the third cycle - «the scientifically-focused vocational education» - is not integrated completely into the higher education structure yet.

It is necessary to mark that in the Code project, contrary to the Roadmap requirements, the definitions of cycles (levels) of higher education do not reflect a range of ECTS credits for each educational level. The duration of training is still calculated by years.

Conclusions

Obligations to reform the architecture of higher education, as a whole, are carried out by the Belarusian party. At the same time, it is necessary to notice that the architecture of three cycles has not been approved legislatively yet. Prospects of accepting the new edition of the Education Code remain vague. Besides, in the Code project, there is the approach to define the

⁸ <http://www.nihe.bsu.by/index.php/ru/novosti-instituta/1418-mezhdunarodnyj-seminar-sovremennye-podkhody-v-uchebno-programmnom-obespechenii-vysshego-obrazovaniya>

⁹ Legal aspects of implementing EHEA tools in the national educational system. - Presentation by Titovich I. - NIHS, 2016. http://bolognaby.org/images/uploads/2016/12/Titovich_2016_confer.pdf

¹⁰ Features of designing educational standards of Generation 3+. - Presentation by Artemyeva S. M. - NIHS, 2016. http://www.nihe.bsu.by/images/norm-c/project-doc/30_11_2016.pdf

¹¹ Use of credits with the account of priority ranking of learning outcomes. - Presentation by Shvaiko V. G. - NIHS, 2016. <http://www.nihe.bsu.by/images/norm-c/project-doc/ECTS.pdf>

¹² <https://www.bsuir.by/ru/news/98968-proekt-redaktsii-kodeksa-respubliki-belarus-ob-obrazovanii-obsudili-v-bguir>

duration of education, which does not consider the recommendations of the Roadmap and the reviewed ECTS Users' Guide.

Quality assurance

Commit to establishing, by the end of 2017, the legal basis for an independent quality assurance agency in conformity with the European Standards and Guidelines.

By the end of 2015, develop a timetable for establishing this agency.

Through the BFUG, invite foreign quality assurance experts to advise on the timetable and plans for establishing the agency as well as on the process leading to it being established.

If we compare the project and the current Education Code, we shall see a certain movement in the direction of implementing the Roadmap requirements, including the requirement to have open statistical information on results of quality control. Simultaneously, just like before, the project does not provide any other semantic evaluation of quality and control purposes, except for checks on «conformity of education to requirements of the educational standard, education-program documentation of a corresponding educational program». Thus, it is only possible to hope that these requirements will correspond in due course to ESG principles.

There is also an obvious vacuum in questions of regulating licensing and accreditation of educational institutions and educational programs. Rigid restrictions of this activity by only state structures obviously contradict the Roadmap provisions.

There are no changes in the practice of providing quality externally. The system, standard base, and accreditation and licensing procedures remain the same; attraction of foreign experts and interaction with foreign agencies, working in the field of quality control, are not to be expected. The system does not correspond to ESG requirements because of the absence of the National Qualification Framework and professional standards based on a functional approach. It does not use a considerable part of criteria of the ENQA network. For example, stakeholders practically do not participate in quality evaluation procedures; results evaluation criteria are not explained to students; reports on internal and external evaluation of quality are not published; the Quality Department does not publish analytical reviews of results of its activity, either.

Conformity of the current and projected acts of legislation and other regulation (accepted for the Quality Department) to ESG recommendations as for 15 indicators allocated by us (numbers of the summary list of ESG standards is preserved) shows their partial conformity only:

| № according to ESG | Indicator | Need to modify the legislation | Need to modify the practice | Conformity with Roadmap requirements |
|--------------------|-----------|--------------------------------|-----------------------------|--------------------------------------|
| 1 | 2 | 3 | 4 | 5 |

| | | | | |
|------|---|--|---|-----|
| 1.10 | Cyclical external quality assurance Institutions should undergo external quality assurance in line with the ESG on a cyclical basis. | no | no | yes |
| 2.1 | Use of internal quality assurance procedures: External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines. | yes Do not take into consideration | yes no practice | no |
| 2.2 | Designing methodologies fit for purpose External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement. | yes Interested parties are not involved; their purposes are not considered; | yes | no |
| 2.3 | Implementing processes External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include - a self-assessment or equivalent; - an external assessment normally including a site visit; - a report resulting from the external assessment; - a consistent follow-up. | yes Regarding self-assessment | yes Regarding revalidation of the data of the self-assessment report | no |
| 2.4 | Peer-review experts External quality assurance should be carried out by groups of experts that include (a) student member(s). | yes Regarding attraction of students | yes Regarding attraction of students | no |
| 2.5 | Criteria for outcomes Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective | no | no | yes |

| | | | | |
|-----|---|-----|-----|-----|
| | of whether the process leads to a formal decision. | | | |
| 2.6 | <p>Reporting Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.</p> | yes | yes | no |
| 2.7 | <p>Complaints and appeals Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.</p> | no | no | yes |
| 3.1 | <p>Activities, policy and processes for quality assurance Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.</p> | yes | yes | no |
| 3.2 | <p>Official status Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.</p> | yes | yes | no |
| 3.3 | <p>Independence Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.</p> | yes | yes | no |
| 3.4 | <p>Thematic analysis Agencies should regularly publish reports that describe and analyze the general</p> | yes | yes | no |

| | | | | |
|-----|---|-----|-----|----|
| | findings of their external quality assurance activities. | | | |
| 3.5 | Resources Agencies should have adequate and appropriate resources, both human and financial, to carry out their work. | yes | yes | no |
| 3.6 | Internal quality assurance and professional conduct Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities. | yes | yes | no |
| 3.7 | Cyclical external review of agencies Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG. | yes | yes | no |

Conformity with four out of fifteen criteria formally equals about 30% of the implementation of the ESG standards - however, being taken out of the context, they actually cannot be considered partially implemented requirements of the Roadmap as they only reflect the necessary minimum for the existence of the accreditation system. Thus, in none of published projects of standard documents that have to do with quality assurance in higher education, no changes to correct the situation are found.

No schedule of creating an independent agency (as provided by the Roadmap) is developed. There are no changes aimed at rapprochement with the ESG in the standard documentation of the Department of Quality, a structural subdivision of the Ministry of Education that has to carry out and methodically support accreditation. Therefore, actually, this requirement of the Roadmap is not fulfilled at all; there is no preparatory work because the program of developing education in the Republic of Belarus for 2016-2020 includes no creation of an independent agency of accreditation and bringing the standard base in conformity with the ESG provisions. The instructive letter of the Ministry of Education «About the organization of the educational process in higher education establishments in the 2017/2018 educational year» d/d 23 August 2017 №08-19/5447 does not provide any modifications of the legislation and accreditation practice.

However, there are certain prospects of implementing the obligations of the Roadmap – even though much delayed.

Thus, there is an important initiative of the National Council of rectors - on 26 July 2017, during its session, it analyzed the current system of quality assurance in Belarusian higher education establishments. It expressed the expediency of using the ESG recommendations in practice by those

who are responsible for quality assurance, which confirms our conclusions about the discrepancy between the quality assurance system and the Roadmap requirements and the fact that the activity of the department of accreditation of higher education establishments does not answer to the ESG recommendations. The Council made the following decision:

- To recommend to the Ministry of Education to consider a possibility of introducing some procedural changes in the order of carrying out accreditation of higher education establishments, taking into account the international experience;
- To work together with the Ministry of Education on the question of creating (forming) a structure responsible for evaluation of quality of higher education in the context of the Roadmap provisions;
- To consider a possibility of placing representatives of Belarus in European and international associations and networks in the field of education quality assurance.

It is possible to see that among the heads of higher education establishments there are those who understand the value of European approaches to assure quality of higher education and the necessity of their application in Belarus.

Unfortunately, this understanding has not turned into any real plan of actions. It is possible to think that the only result is the statement of the Minister of Education I. V. Karpenko within the framework of the «national teachers' meeting» on August, 24th, 2017, on the need to create a center to provide the formation in the country of a system of independent evaluation of quality of education, i.e. the agency of control in the educational sphere should become such a center. It, according to the Minister, will be created by the way of uniting structures subordinated to the Ministry of Education - the Department of Quality and the Institute of Control of Knowledge, which now solve absolutely different tasks.

Obviously, the independence of such an agency will only be provided in relation to education establishments, but not in relation to the Ministry - as the agency remains subordinated to it. Thus, the only step planned to be implemented within the Roadmap is to withdraw the accreditation agency from the structure of the Ministry of Education, but to preserve the subordination of the new agency to the Ministry.

There is no information on the preparatory work aimed at implementing this idea in open sources.

Conclusions

The introduction of the ESG recommendations into the current and future legislation remains unsatisfactory. Less than a third of the recommendations is reflected in statutory acts. The obligation to create an independent agency of quality assurance is not fulfilled.

Recognition

By the end of 2016, review legislation and practice with a view to identifying any modifications needed to bring them into conformity with the obligations undertaken by Belarus as a State party to the Lisbon Recognition Convention.

By the end of 2017, implement any required modification of practice that does not require

amending legislation.

By the end of 2017, develop a timetable for the implementation of required legislative modifications.

There are still no published data on the carrying-out of evaluation of the legislation and law-enforcement practice. There have been no changes in the existing normative documents.

In the project of the Education Code (Article 114), there is a norm that says that recognition of education periods belongs to the competence of education establishments. However, this article is not coordinated with ECTS - in the existing practice it only leads to formal account of the time spent by a student in another educational institution, but it does not lead to recognition of the studies fulfilled during this period even in cases of carrying out official exchanges.

The Code project does not settle the situation with reception of additional and informal education abroad. Cases of mobility inside the country are excluded from the process of recognizing the periods of training. There is no regulation of recognition of refugees' education. Qualifications of the third step of higher education are excluded from the recognition process: the diploma of the researcher issued after the end of aspirantura (postgraduate studies) has no value at the national labor market and, hence, cannot be recognized abroad; recognition in the form of establishing the equivalence of the diploma of the candidate of science is within the competence of the Higher Certifying Commission and is taken out of the frameworks of the educational legislation.

The program of developing education in the Republic of Belarus for 2016-2020 does not presuppose to improve the mechanisms of recognition procedures.

The instructive letter of the Ministry of Education «About the organization of the educational process in higher education establishments in the 2017/2018 educational year» d/d 23 August 2017 №08-19/5447 does not provide any modifications of the legislation and recognition practice.

During the current year, the work of the Belarusian ENIC has been analyzed by a group of experts of the Flemish ENIC/NARIC. The results of the analysis have not been published in open sources.

Conclusions

The implementation of the Roadmap obligations as for recognition can be estimated as 50% because joining to the Lisbon convention and work on recognition of foreign qualifications according to its basic provisions is being conducted in the country. However, there is no information on the carried-out analysis of the legislation and the practice of its application; there is no plan to eliminate obvious discrepancies or, at least, it is not known to the public.

Tools to provide transparency

ECTS and learning outcomes

The Roadmap of reforming higher education in Belarus, in the part of the ECTS implementation and learning outcomes, says that in order to achieve the necessary results Belarus will assume the following obligations:

By the end of 2015, develop a plan to implement ECTS in accordance with the revised ECTS Users' Guide by the end of 2017, with a strong focus on learning outcomes, curriculum design, delivery as well as assessment and applied to mobility programmes

By the end of 2017, develop a plan to issue the Diploma Supplement in the format developed by the Council of Europe, the European Commission and UNESCO to all students automatically, free of charge and in a widely spoken language (other than Russian).

In spite of the fact that in Decision №2 of the Presidium of the National Council of rectors d/d 22 February 2017 it is underlined that «...in the project of the Education Code of the Republic of Belarus...

- each educational level is described in terms of learning outcomes (competences); ...
- kinds (cycles) of education are defined by the duration of training in credits»,

this information does not reflect reality.

In the project of the Education Code, there are no descriptors of levels, no learning outcomes, and no range of ECTS credits for each level (cycle) of education.

The project of the Education Code says that the system of academic hours and/or the system of credits can be applied while planning educational programs of higher education and while defining their labor intensity, which attests that the use of ECTS credits has no binding character. The description of the credit in the project of the Code has no correlation with learning outcomes and does not consider the complexity of the discipline, its importance, as well as kinds of educational activity, during calculations, which does not correspond to the Roadmap requirements and corresponds not to the full to the ECTS Users' Guide provisions. In 2015, even before the Yerevan conference, in Belarus a methodology of calculating credits was developed and put in force. Credits were introduced into curricula. After the acceptance of the new ECTS Users' Guide, the credits calculating methodology was not corrected despite the fact that the letter of the Ministry of Education of the Republic of Belarus to higher education establishments (d/d 14 October 2016 №08-19/4097/ds «About the organization of the educational process in higher education establishments in the 2016/2017 educational year» says that within 2016, together with the NIHS [National Institute of Higher School], measures should be taken to work out «... normative legal acts that will regulate the measurement of labor intensity of the educational process in credits according to the ECTS ...».

The ECTS implementation plan until the end of 2017 according to the reviewed ECTS Users' Guide and with the account of the priority ranking of learning outcomes, which, according to the Roadmap, should have been developed till the end of 2015, is still absent in official sources.

In the project of the Code, there is no term «learning outcomes» at all.

It is necessary to admit that in the Code project the credits are not used to plan, to implement, and to monitor educational programs. They are not used to organize mobility and to recognize periods of training, either.

In the Code project, as well as in the current Code, «the competence approach» is mentioned only, but without any further detailed elaboration.

At the same time, it is necessary to positively mark that projects of models of educational standards of Generation 3+ developed for bakalavriat (Bachelor's program) and magistratura (Master's program) are based on the competence approach – they contain learning outcomes and ranges of credits for a corresponding educational level and are presented on the web-site «National portal of projects of educational standards of higher education»¹³. The specified indicators are not developed for the so-called scientifically-focused vocational education as a third cycle of higher education.

There are no approved models of educational standards of Generation 3+ and educational standards developed on their basis, which can be explained by the absence of the legislative and standard-methodical base for their acceptance.

Conclusions

Proceeding from the accessible information, it is possible to notice that there are some movements in the implementation of the Roadmap requirements when it comes to the implementation of the ECTS according to the reviewed ECTS Users' Guide and with the account of the priority ranking of learning outcomes; however, there are no considerable changes in the higher educational system yet.

The Code project in a new wording cannot provide to the full the implementation of the obligations concerning such a system of credits that would correspond to the ECTS Users' Guide aimed at planning and implementing curricula and at diversifying and developing academic mobility.

Diploma Supplement

The Roadmap of reforming higher education in Belarus, in the part of the Diploma Supplement in the format developed by the Council of Europe, says that in order to achieve the necessary results Belarus will assume the following obligations:

By the end of 2017, develop a plan to issue the Diploma Supplement in the format developed by the Council of Europe, the European Commission and UNESCO to all students automatically, free of charge and in a widely spoken language (other than Russian).

There is no accessible and other information on the preparation of the Diploma Supplement in the format developed by the Council of Europe, the European Commission, and UNESCO to all students

¹³ <http://www.edustandart.by/>

automatically, free of charge, and in a widely spoken language (other than Russian). We can think of what can be made in this direction, being based on the Code project only.

The Code project says that it is possible to issue an annex to the diploma of bakalavr (Bachelor) and magistr (Master) according to the all-European sample of the «Diploma Supplement» (DS); however, nothing is said about “automatically, free of charge, and in a widely spoken language (other than Russian)”. The solution of the question whether citizens of Belarus have a possibility to receive the DS «in a widely spoken language (other than Russian)» remains vague because the Code project plans to issue the DS in other languages, but only «to foreign citizens and stateless individuals who temporarily stay or temporarily live in the Republic of Belarus, who received education in the Republic of Belarus».

Mobility of higher education staff and students and internationalization

In autumn 2015, launch work on a plan to facilitate, develop and diversify the international mobility of staff and students to as well as from Belarusian higher education institutions. Such a plan would be expected to include changes to the current system of mobility permits, to allow longer periods of mobility within the EHEA for both staff and students, without ministerial approval. The plan should be completed by the end of 2016 and should outline policy measures as well as any required legislative measures required to increase and diversify academic mobility from Belarus to its partners in the EHEA. Any required legislative measures should be introduced by mid-2017.

Thus, in the sphere of mobility of higher education staff and students and internationalization, the Roadmap has two tasks:

- 1). To work out a Plan of providing, developing, and diversifying international mobility;
- 2). To modify the existing system of granting travel permissions for the purpose of prolongation of terms of stay of tutors and students in the EHEA countries without the necessity of receiving permissions from the ministry.

Working-out of the Plan of providing, developing, and diversifying international mobility

As of the end of September 2017, there is no Plan of providing, developing, and diversifying international mobility (as a complete and approved document); *it is possible to constate partial implementation of this task.*

It is attested by the project - «Concepts of developing international academic mobility within the framework of the EHEA» (October 2016). The project «Concepts...» contains a short analysis of the condition of academic mobility, formulations of purposes, tasks, priorities, and directions of its development, as well as a list of concrete actions/events aimed at providing, developing, and diversifying international mobility of tutors and students who come to Belarusian higher education establishments, as well as those who go abroad, which, to a certain degree, corresponds to the Roadmap provisions. The project "Concepts..." mentions sources and approximate volumes of financing of academic mobility and formulates tasks of strategic planning of this sphere and substantial increase of quality of administration of international exchange programs.

The project «Concepts...» contains a task of «working out regulatory legal acts regulating academic mobility according to the norms of the project of the new version of the Education Code». However, in the project of the new edition of the Code, no correction of articles that have to do with legal securing of academic mobility is envisaged.

Besides, it is necessary to mark a number of activities of the Ministry of Education in the sphere of academic exchanges and internationalization. In particular, the state-run program «Education and youth policy» for 2016-2020 pays certain attention to the development of academic mobility of tutors and students. It says that «tutors' traineeship and invitation of well-known experts in their areas from abroad for lectures create preconditions to improve the quality of teaching». The scale of academic mobility of tutors («the number of tutors of higher education establishments (HEEs) who had traineeships abroad») is considered one of three criteria of implementing the task of improving the quality of preparation of experts with higher education. In order to «increase the competitiveness of higher education in the world educational space», the development of «cooperation of Belarusian HEEs with foreign HEEs regarding the implementation of educational programs» and «activation of students and tutors exchanges at national and international levels» are envisaged.

Thus, it is possible to say that despite the absence of a complete and approved Plan there has been certain work in the sphere of developing academic mobility and internationalization that coincides with the Roadmap purposes.

Modification of the existing system of granting travel permissions for the purpose of prolongation of terms of stay of tutors and students in the EHEA countries without the necessity of receiving permissions from the ministry.

As of September 2017, the task is not fulfilled. Conditions of trips abroad are regulated by Order №108 of the Ministry of Education of the Republic of Belarus d/d 10 February 2016 «About consideration of documents of official journeys abroad of employees of organizations subordinated to the Ministry of Education», published already after Belarus joined the Bologna process.

Its analysis attests that there are no basic changes in the organization of such trips. Just like before, students and tutors who are going abroad for the term of more than 10 days need to receive permission of the Ministry of Education. This order remains in force now, which makes it possible to conclude that the basic requirement of the Roadmap in sphere of academic mobility - «Modification of the existing system of granting travel permissions for the purpose of prolongation of terms of stay of tutors and students in the EHEA countries without the necessity of receiving permissions from the ministry» - is not fulfilled.

Conclusions

Thus, it is possible to constate that out of the two tasks: one – “To work out a Plan of providing, developing, and diversifying international mobility” - is fulfilled partially; the other one – “To modify the existing system of granting travel permissions” - is not fulfilled completely. The total activity of the Ministry of Education in the sphere of academic mobility and internationalization can be estimated in the volume of 50% of what is needed; there is certain progress in targeting, planning, and transparency of the process.

Lifelong learning and the social dimension of higher education

By the end of 2015, develop a plan for the recognition of prior learning and implement the plan by the end of 2017.

Since the beginning of the Roadmap implementation, the Belarusian Ministry of Education was not planning this kind of work. This article was not included in the Working Plan for EHEA Tools Introduction into the National System of Education for 2015-2018 presented by the Belarusian party to AG2. The topic of recognition of results of informal education according to the ECTS Users' Guide 2015 is reflected neither in accepted statutory acts, nor in the project of the new edition of the Education Code, which public discussion was launched in February 2017.

By the end of 2016, review the obligation for students whose education is financed by public funds to accept work placements on graduation with a view to limiting it to specific professions for which there is a significant unmet need in the country and taking into account practice in other European countries.

The obligation to restrict the practice of compulsory work placements of HEEs graduates, whose education is financed by the state budget, is not fulfilled.

There are no basic changes in the legislation that regulates the practice of compulsory work placements of HEEs graduates.

The only step to soften the consequences for the graduates who refuse compulsory work placements is [Decision of the Council of Ministers №998 d/d 07 December 2016](#) to reduce on 20-30% the sizes of penal sanctions (the so-called compensation by the graduate of expenses of the budget on the preparation of the expert). This reduction becomes possible because the sums, which were used to pay scholarships, are excluded from the means that have to be returned to the state budget.

Simultaneously, contrary to the obligations of the Roadmap implementation, the practice of compulsory work placements is not limited, but au contraire – there are steps that essentially worsen the condition of graduates of higher education establishments. Decree of the President of the Republic of Belarus №4 d/d 09 January 2017 http://www.pravo.by/upload/docs/op/P31700004_1484168400.pdf widens the use of such a tool as “targeted preparation of experts”, providing not 2-year compulsory work placements, but not less than 5-year compulsory work placements. The share of places for students of targeted preparation is increased up to 50% in the field of public health services, up to 60% - for agricultural specialties, and up to 40% - for all other specialties. Besides the increase of the duration of compulsory work placements, this targeted preparation allows the state to transfer partially or completely the expenses on training of students to so-called «those who need these experts».

In the project of the new edition to the Education Code presented for the public discussion in February 2017, there are no changes that correspond to the Roadmap obligations. There is a detailed [analysis](#) of the project.

In 2016 and 2017, there were serious problems with the employment of young experts. For the first time during a long period of time, the staff deficit was replaced by a deficiency of workplaces, especially for people with no work experience. In these conditions, the system of distribution of graduates inherited from the Soviet period has turned into obvious and absolutely inefficient anachronism. Its preservation became possible, mainly, at the expense of manipulations with statistics, direct pressure upon heads of HEEs, and intimidation of students. Under the pressure of the authorities, rectors and deans of higher education establishments are compelled to compensate the lack of demands for graduates by forcing students trained at the expense of the budget to submit fictitious demands from employers in order to preserve good statistics. It is proved by the report on the distribution of graduates in the 2016/2017 educational year, prepared by a number of independent students' organizations (Brotherhood of organizers of students' self-rule, Belarusian Students' Association) and the Human Rights Defending Center "Spring" [Viasna].

Monitoring of infringements of the rights Even admitting there is a problem, [Alexander Lukashenko](#) has rejected any modernization of the employment system, "We had very serious debates recently, what to do in this regard, because we are having serious turbulence in the economy. I'm categorically against it."

Despite the blocking of changes in the system of compulsory placement of graduates of higher education establishments at the highest political level, such changes in the spirit of the Roadmap are supported by a considerable number of rectors and some members of Parliament.

BFUG's principled and consecutive position concerning the implementation of the Roadmap obligations could strengthen the positions of reformers in the educational system and spur modernization of the anachronistic system of compulsory work placements.

By the end of 2017 review the criteria for financial support for students with a view to ensuring social equity unaffected by applicants' gender, race, colour, disability, language, religion, political or other opinion, national, ethnic or social origin, association with a national minority, property, birth or other status.

Criteria of granting of financial aid to students have not been reviewed. Students of private higher education establishments still have no right to receive such help. In particular, it concerns soft loans to receive higher education, scholarships, etc. Only students of a budgetary form of studying have the right to receive material aid at the expense of the budget.

In comparison with the current standards, no essential changes regarding bigger social justice while granting financial aid to students are introduced into the project of the new edition of the Education Code.

The right to receive the Grant of the President of the Republic of Belarus now covers all HEEs students – it can be considered the only exception. Before - this right belonged only to students of state-run HEEs and higher education establishments of consumer cooperative societies.

Still, this expansion of the circle of people who have the right to receive this grant will have no essential influence on the scale of financial aid because it is limited by the quota of 200 grants according to Decree №398 of the President of the Republic of Belarus d/d 06 September 2011 «About social support to students».

Conclusions

The Belarusian party's obligations in the sphere of continuous education and social dimension of higher education are not fulfilled - their implementation is not planned in projects of legal acts.

Fundamental values of the EHEA

Implement the commitments made by the ministers at their meeting in Yerevan, as stipulated in the Yerevan Ministerial Communiqué.

By mid-2017, the Ministry will conduct an analysis of national legislation and submit to Parliament proposals for required measures to incorporate the principles of the Magna Charta Universitatum and Council of Europe recommendation Rec/CM(2012)7 on the public responsibility for academic freedom and institutional autonomy.

By mid-2016, develop a plan detailing legislative and policy measures aimed at enabling students and staff to organize freely and to register their organizations. By mid-2017, introduce any required legislative measures.

In accordance with the Yerevan Communiqué, Belarus was obliged to support and defend the academic freedom and to guarantee the faculty and students can participate fully in management of autonomous higher education institutions.

However, contrary to the obligation, Belarusian human rights defending organizations recorded the increase of repressions against students and faculty. The Polish government had to reinstate Kastuś Kalinoŭski Scholarship Program to support repressed Belarusian students. This program established in 2006 was redesigned in 2016 for the purpose of deepening Belarusian graduates' professional qualification. The intensification of academic repressions in Belarusian universities forced the Polish side to return to the initial goal of the scholarship - to support Belarusian students expelled from their home universities on political grounds to continue their higher education at Polish universities.

On September, 4th, 2017, the Council of human rights defending organizations of Belarus confirmed the status of victims of academic repressions of first 15 candidates who would like to receive the Kalinoŭski Scholarship.

It is characteristic that by this time three Belarusian universities have signed the Magna Charta Universitatum. However, it has not stopped academic repressions and infringements of academic freedoms in these higher education establishments.

The Belarusian party's obligation - to present by the middle of 2017 a proposal to Parliament to **incorporate the principles of the Magna Charta Universitatum and the Council of Europe recommendation Rec/CM(2012)7 on the public responsibility for academic freedoms and institutional autonomy** - is not carried out.

Recommendations do not find their reflection in the educational policy.

Neither Government, nor Ministry of Education distributes the Recommendations among people and organizations dealing with higher education. The English text or its translation into Russian or Belarusian is published on none state information resource or web-site of higher education establishments. There are publications of the Recommendations on specialized web-sites (pages) dedicated to Belarus' participation in the EHEA, which creation was reported by the Ministry of Education.

The CM/Rec(2012)7 is not mentioned in official documents of the Ministry of Education.

The Belarusian authorities do not carry out the obligations provided by Article 7 of the CM/Rec(2012)7 - to create conditions to provide academic freedoms: in particular, to accept the National Qualification Framework and to create an Independent Quality Assurance Agency. There is still the practice of restricting academic autonomy of higher education establishments because of the preservation of typical curricula.

Collegiate bodies of higher education establishments, the academic community still have no powers to make obliging decisions on key questions of the life of universities.

There is censorship based on the requirement to submit the process of teaching and education to the purposes of the state ideology and prosecution of students and tutors on political grounds.

The analysis of changes and additions in the Code project [demonstrates](#) that no considerable changes in providing academic freedoms and institutional autonomy are planned.

There are no plans to return the terms «academic freedoms» and «institutional (university) autonomy», withdrawn from the Law on Education in 2009, to the current legislation.

The Code project does not provide the CM/Rec(2012)7 guarantees of the rights of institutions and individuals to be protected from any external intervention of the authorities and to be provided with the freedom to teach, to study, and to research with no fear of disciplinary actions, dismissal, or other forms of punishment.

Just like before, these rights are not individualized in regard to students and faculty members of higher education establishments, are declarative, and contain no implementation mechanisms. They do not even declare the right to teach, to study, and to research with no fear of disciplinary actions, dismissal, or other forms of punishment. At the same time, a number of articles have restrictions of academic freedoms or do not create obstacles for infringements of academic freedoms (state ideology, absence of termless contracts of tutors, arbitrary establishment of terms of contracts by HEEs rectors, absence of interdiction to restrict academic freedoms of tutors by referring to the status of employees of state-run institutions, etc.)

The Code project does not provide any expansion of HEEs organizational autonomy. In particular, no transition from appointment to election of rectors of higher education establishments is envisaged.

In the Code project, the implementation of the CM/Rec(2012)7 recommendations regarding the widening of financial and personnel autonomy is not envisaged.

As for academic autonomy, the Code project presupposes small expansion of the rights of higher education establishments to form curricula (from 35% to 50%), but it does not change essentially the independence level in other aspects of academic activity.

No redistribution of powers in favor of collegiate regulatory bodies of higher education establishments is envisaged by the project.

It is not planned to introduce other CM/Rec(2012)7 recommendations into the legislation.

By mid-2016, develop a plan detailing legislative and policy measures aimed at enabling students and staff to organize freely and to register their organizations. By mid-2017, introduce any required legislative measures.

The Belarusian party has made no steps to implement this obligation. There are still declarative norms in the Education Code about the right of pupils and tutors to participate in or to create organizations, but it does not correspond to the real practice and legislation on the creation and registration of public associations.

The basic restrictions are still the following: 1) the order of state registration is of an allowing, instead of notifying character; the procedure is difficult, with a possibility of arbitrary refusals in registration of any created organization; 2) interdiction of activity of a non-registered public association, for which infringement there is criminal punishment up to two years of imprisonment (Criminal Code, Article 193.1); 3) the legislation establishes essential restrictions for public associations to receive financing from internal and foreign sources; 4) the right of public associations to have peaceful meeting, as well as the freedom of expression, is essentially limited.

The implementation of the Roadmap requirements should provide, at least, a transition from the allowing principle of state registration of organizations to the notifying principle. Besides, it is necessary to cancel Article 193.1 of the Criminal Code - criminal punishment for activity of NGOs with no state registration. However, no steps in the direction of liberalization of the legislation in this regard are planned.

Conclusions

The Belarusian party's obligations as for the implementation of fundamental academic values are not fulfilled; their implementation is not planned in the discussed projects of legal acts.

General conclusions

The Roadmap implementation monitoring demonstrates that none of the obligations assumed by the Belarusian party in 2015 is fulfilled completely and on time.

By October 2017, when it was planned to complete the implementation of these obligations, it is possible to see the absence of any considerable progress in the creation and legislative securing of the National Qualification Framework, the absence of any legislatively secured transition to the

Bologna architecture of three cycles, the absence of any progress in the creation of an Independent Quality Assurance Agency, and only 30% of implemented ESG standards. There is some progress in the ECTS implementation, but meanwhile the use of this tool does not correspond with many standards of the ECTS Users' Guide. Nothing is known about plans to provide automatically free-of-charge issue of the Diploma Supplement. As for the development of academic mobility and internationalization, there was some work on the Plan of providing, developing, and diversifying international mobility; however, there are no data that this Plan was approved. The obligation to modify the existing system of granting travel permissions for the purpose of prolongation of terms of stay of tutors and students in the EHEA countries without the necessity of receiving permissions from the ministry is not carried out. None of obligations concerning social dimension of higher education and implementation of fundamental academic values is fulfilled. Despite the obvious inefficiency and the public demand to change the system of compulsory work placements of graduates, the implementation of this obligation is pointedly blocked by the authorities. The obligation to implement the CM/Rec(2012)7 recommendations, legislative measures, and measures of the educational policy aimed at providing the right of students and tutors to freely create organizations and to register them is pointedly ignored, too.

In the project of the new edition of the Education Code discussed in February 2017, there were proposals to implement the Bologna architecture and to introduce the right of graduates of higher education establishments to receive the Diploma Supplement. At the same time, this project did not contain provisions that would provide the implementation of other obligations of the Roadmap.

The implementation of the Roadmap has recently deteriorated as the discussion on the new Education Code at the National Assembly is postponed indefinitely.

Changes and amendments to other legal acts (Labor Code, Criminal Code, Civil Code, Law about public organizations, etc.), which could provide the implementation of the Roadmap obligations, are not introduced and not discussed publicly.

Many results of the international examination of the Belarusian educational policy and legislation, carried out within the framework of the EHEA, are not published and remain unknown to the public. It aggravates the atmosphere of information closeness that characterizes the Belarusian higher educational system even more.

Public access to regulatory documents of the Ministry of Education has been gradually curbed in 2017. For the first time in many years, there is limited access to ministerial guidance and methodology letters on how to organize the educational process in higher education institutions.

There is lack of progress in the areas of the social dimension of higher education and the implementation of academic values, i.e. the spheres that initially were of great concern to the EHEA members. These issues were behind excluding Belarus accession to the EHEA from the agenda in 2012.

Unfortunately, the Belarusian authorities will not manage to fulfill their obligations as for the implementation of the Roadmap provisions within the agreed time period. The best solution in such a situation would be to extend the Roadmap implementation timeline for 2-3 years and to maintain international control over its implementation.



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