

**COMMISSION STAFF WORKING DOCUMENT
TOWARDS A EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG
LEARNING**

RESULTS FROM THE CONSULTATIONS AT NATIONAL LEVEL

The purpose of the national consultation process was to seek comments on the submitted Commission Staff Working Document “*Towards a European Qualifications Framework for Lifelong Learning*”.

The national consultation process was launched by the Bulgarian Ministry of Education and Science on the 12th of August, 2005 and covered a 3-months period. Representatives of different sectors most directly concerned by the development and implementation of the EQF were contacted. These included representatives of the ministries of education and science, labor and social policy, economy, health, youth and sports, regional development, justice, transport and communications, culture and tourism. The Ministry of Culture further disseminated the consultation document among the 5 national centers for arts. Different departments of that ministry were also consulted.

Representatives of the National Agency for Evaluation and Accreditation, National Agency for Vocational Education and Training, the Vocational Training Center of the Bulgarian Chamber of Commerce were also contacted. NGOs, like Association for Academic Community Support also participated in the process, together with the representatives of the academic community (Bulgarian Council of Rectors, Department for Information and Teacher Training). Last but not least, Bulgarian Teachers Trade Union was also involved in the consultation process.

The consultation document was disseminated electronically. Participants were invited to provide comments on any aspect of the proposed EQF with additional comments to the questions addressing the key issues surrounding the EQF as formulated in Section 9 of the paper.

The proposed EQF provides guidelines for cooperation between stakeholders at different levels. It also provides basis for development of tools and instruments meeting the requirements of individual citizens in terms of credit transfer, lifelong learning basic skills accumulation, validation etc. One should take into account that EQF implementation is on voluntary basis, thus excluding any legal obligations. That approach is very promising in terms of qualifications framework development in different countries. Moreover, individual national qualifications frameworks could well be compared to the European one. As to the practical implementation of the EQF, related to the citizens’ needs, to the development of both the education and training systems and the European labor market, it depends largely on the comparability of the output levels of competences, assessed by objective quality criteria. Last but not least, the proposed EQF provides for objective assessment of knowledge and competences.

The vocation education and training institutions in Bulgaria are well defined (vocational secondary schools, schools of arts, vocational colleges, centers for vocational training, centers for information and professional guidance, centers for trainees qualification), thus one can expect successful implementation of the EQF at national level. In general, the successful implementation of the EQF in Bulgaria requires adequate activities to be undertaken such as awareness raising campaigns at national level, together with making use of already existing structures and processes, such as Bologna promoters. Last but not least, one should mention

different capacity building measures accompanied with peer learning and provision of technical expertise through existing networks for regional and international cooperation. The establishment of a European portal for learning opportunities could be considered particularly useful.

As to the specific questions, the results could be summarized as follows:

The rationale of an EQF

The proposed consultation document presents the most important objectives and functions to be fulfilled by a meta-qualification framework orientated towards a better comparability of the national approaches in this field. It also provides information on the way the EQF will function. The document meets the requirements for substantial social, technological and economical changes. The EQF is orientated towards modern education and education systems, by taking into account the increasing mobility at European level. The objectives and functions of the EQF are related to the ongoing processes of reforms at national level, thus further assisting the contemporary concepts developments in the field of education and training. On the other hand, the document introduces basic notions in order to guarantee their unification. One can assume that the proposed EQF defines the main trends for suitable developments at national level as well.

The EQF's basic function - enforcing the mutual trust between the different stakeholders, involved in lifelong learning, is a precondition to decrease the barriers existing in the different countries. It is also a precondition for effective use of existing knowledge, skills, and personal competencies. Concerning the communications between the systems on European, national, and sector level, EQF offers general recommendatory basis related to learning results and levels of competency. From one hand it facilitates the communication between training providers and learners. From another hand it provides qualification levels and descriptors, that are enough general to embrace the variety of qualifications existing on national and sector level. EQF can function as a translator tool giving opportunities to measure and compare the learning results on European level, as well as on national, regional, and sector level. It can also function as a common recommendation in quality assurance and development of the education and training.

Lifelong learning becomes a necessity. It is characterized by important social, technological and economical changes. Several European countries are seeking to further improve their education and training systems in terms accumulation of contemporary knowledge, skills and basic competences. In some cases institutional barriers, limiting the access to education and training, could be observed in a given country, thus preventing the effective use of knowledge and competences already acquired.

Substantial work has already been done at European level in the field of quality assurance, informal and non-formal learning development, career guidance and basic competence acquirement. Each country is trying to implement the European document in this field, together with wider use of the experience already accumulated. The specificity of the existing education and training systems should also be taken into account, together with innovative approaches for process development. Within that context, some reference points should be defined. The proposed EQF could be considered as a document providing for national qualifications frameworks development at national and sector level. Furthermore, it provides for comparability among the different national frameworks, thus contributing to transparency development at European level. The adoption of the EQF will also contribute to better use of knowledge, skills and competences acquired, together with further development of citizens' mobility on national and European labor market. Last but not least, the EQF will further facilitate qualifications transfer and recognition, by using learning outcomes evaluated and certified by the competent authorities at national or sector level.

In order to make the EQF work in practical terms it should be widely promoted at national level. Its implementation should be related to the process of reforms at national or sector level. EQF practical implementation could be done at several levels:

- ◆ European – through mutual agreements expressed in terms of decisions of the ministers or development of EQF or similar documents;
- ◆ National – by establishing a link between EQF and national legislation in the field of lifelong learning and National qualifications framework development; by organizing information campaigns oriented towards main stakeholders;
- ◆ Individual – through creating opportunities for acquisition, recognition and certification of professional qualifications; establishing a relationship between learning outcomes and the national qualifications framework; European documents implementation, thus further developing qualification transparency.

On the other hand, the EQF should be implemented in a large number of European countries. It would also clearly define whether its applicability is compulsory, together with information on the way it should be implemented. At the same time main stakeholders should be well informed on the content of the proposed levels and descriptors, thus providing for their common implementation. The EQF should serve as reference framework for improvement of the information exchange, for closer cooperation between different stakeholders, for better transparency etc. It should also provide user-friendly information for students, institutions and employers in order to orientate them inside and between the different systems for vocational education and training and to determine in broad sense their learning results. EQF should ensure direct support to the institutions responsible for education and training by providing them the opportunity to set and compare their learning proposals using it. It should ensure a framework for the sector and trade associations of the branches of industry in determining possible links, coalescence and distinguishing of qualifications on sector and national level. In relation to recognition of education, training, and learning, EQF should also be considered as a good tool for evaluation and recognition of qualifications acquired outside EU.

In order to perform its functions completely, the EQF should:

- ◆ have enough publicity
- ◆ a public agreement on it needs to be achieved
- ◆ a national qualification framework should be developed in compliance with the EQF
- ◆ tools for EQF's implementation in the process of foreign qualifications recognition should be developed

The proposed levels of knowledge, skills and competences should be included into the final qualifications awarded by different training institutions, thus assisting the process of information exchange as well as the overall recognition process.

EQF practical implementation at national level could be related to reforms in the field of education, orientated towards changes in the training programs, knowledge and skills assessment, initiation of a dialogue between education institutions and employers, further development of criteria for awarding educational degrees and qualifications.

The reference levels and descriptors

The proposed 8 levels, based on knowledge, skills and competences, reveal the complex character of the study process. They are enough general and set up conditions to envelope the variety of qualifications on national and sector level. At the same time they draw the opportunities for learning progress from the lowest to the highest level of education, training, and professional realization in sense of development and improvement of competencies and mastery. The levels will provide for better practical orientation of the overall learning process. As to the meta-framework (Table 1) it is not directly related to the educational systems themselves, but refers to the educational levels. Such an approach is extremely useful for lifelong learning opportunities, taking into account that substantial part of the training process takes part in the workplace beyond the formal educational system. By this way, EQF can be considered as a multi-purposeful framework, oriented to all stakeholders in education and training, who are integrated by the necessity to deal with lifelong learning and to participate in it too. The degrees of professional qualification in Bulgaria can easily be assigned to the proposed 8 reference levels.

The proposed 8 levels referring to learning outcomes, together with the basic descriptors, could be considered as a reliable basis for the elaboration of national qualification frameworks for lifelong learning. Concerning secondary general education the proposed educational, training and learning structures and input characteristics do not present significant problems. The descriptors could also be considered as adequate to the learning outcomes and the transition to the next level. They also provide information on the degree of independent work typical for each level. However, further precision of the criteria for each level could be recommended.

The 8 levels with their corresponding descriptors orientated towards learning outcomes, are in the very heart of the EQF. However, the EQF does not contain detailed descriptions of specific qualifications, learning paths or access requirements. These should be included within the national or sector qualifications frameworks. General descriptors have a key role to play in quality assurance, validation of informal and non-formal learning, consultancy and improvement of the basic competences.

As to the content of Table 2 it presents well the description of the education system, and the structures for education and training. It should also present in details the level characteristics, as well as the documents to be awarded by the competent bodies at each level. The learning outcomes based approach provides for better results than the “input-output” based systems. The supporting and indicative information presented in Table 2 contains information on different aspects of the qualifications systems that are closely related to the learning outcomes. That information might contribute to the further precision of the specific needs as defined at national level.

The supporting and indicative information is expected to:

- ◆ Indicate the correspondence between education and training leading to professional competences acquisition;
- ◆ Define the requirements in compliance with the specificity of the legislation framework;
- ◆ Define the characteristics of the education and training systems and their readiness for lifelong learning implementation.

The EQF’s level descriptors correspond to the system of qualification degrees, adopted in Bulgaria, with respect to dimension and the specific volume of knowledge, skills and competences. From this point of view, the descriptors present adequately the learning outcomes in our country. They distinguish enough clearly the different levels and the transitions from one

level to another. The proposed level descriptors for levels 1-5 are comparable to the knowledge, skills and competences defined in the State education requirements for study content in different general education subjects.

The necessary clarity and transparency related to the qualification degrees in Bulgaria should be ensured with respect to content and role of the “supporting and indicative information” on education, training and learning structures and input (Table 2), regarding as follows:

- Input level of education and qualification;
- Training content, organization, form and methods;
- Output level of education and qualification;
- Opportunities for validation of qualification acquired by non-formal and informal learning;
- Opportunities for realization on the labour market;
- Opportunities and conditions for transition to the next qualification degree in order to implement long-term individual strategy;
- Correspondence between a given qualification degree to the EQF reference levels;
- Opportunities for recognition of qualifications outside the country;
- Specific information about the different target groups (learners, training providers, employers, institutions on the labour market, organizations of the social partners, institutions responsible for the quality of training, controlling institutions, etc.)

The legislation regulating secondary general, secondary vocational and higher education in Bulgaria is in compliance with the principles of lifelong learning. The levels of education could be easily recognized in the proposed 8 levels of the EQF: levels 1-4 are covered by the Vocational Education and Training Act, while levels 5-8 are covered by the Higher Education Act. Level 8 comprises different programmes for qualification up-grading as well as programs for further education offered by different training institutions.

Actually, the list of professions in Bulgaria, as further completed and up-dated, defines the professions at given level, according to the expected learning outcomes, oriented towards given knowledge, skills and competences.

The Bulgarian approach in defining qualification levels and professional competences is comparable to the approach developed by the EQF – it is based on knowledge, skills and personal qualities required for practicing of a given profession. The in-depth analysis of the proposed levels, together with the additional information, indicates that the qualification levels in Bulgaria (including education levels as defined by the respective legislation) are comparable to these proposed by the EQF.

In the field of higher education in Bulgaria, the EQF’s qualifications are in compliance with the ISCED 97 levels, for example:

- EQF’s level 6 is comparable to levels 5 and 5B of ISCED 97 (degrees of Bachelor/Master and Specialist in Bulgaria)
- EQF’s level 7 is comparable to level 6 of ISCED 97 (Doctor’s degree in Bulgaria)

How can Bulgarian qualifications system be developed towards a learning outcomes approach?

For example, in Bulgaria there is a list of professions for vocational education and training. It classifies these professions in four levels, based on the levels of competency. These levels can correspond to the learning outcomes described in Table 1 of the EQF from level 1 to level 4. Framework requirements for developing State educational requirements for acquisition of professional qualification were elaborated in 2002. The structure of this framework ensures unified approach for development of state educational requirements. The learning outcomes are presented here by knowledge, skills, professional and personal qualities. It makes easier the association process of qualification degrees to the corresponding EQF levels.

National Qualifications Frameworks

The proposed staff working document meets the basic requirements for the development of a national qualifications framework, which should be compatible with the EQF.

In order to develop the national qualification framework for lifelong learning, it is necessary to work in the following directions:

- To analyze the acting national qualification framework with respect to the EQF's principles and philosophy;
- Precise association of the existing qualification system in Bulgaria to the EQF's levels and descriptors;
- Development of supporting and indicative information;
- Development of the credit transfer system;
- Linking the initiatives on sector level to the national qualification framework by consulting and joint work of representatives from the different sectors and the government, responsible for the qualification of the working power.

From that point of view, establishment of a national coordinating body, responsible for applying the EQF's principles at national and sector level, is of a great importance. It can be established to an acting institution in the field of education, training, and development of human resources.

Concerning the timescale for development of national qualifications system based on learning outcomes, a 1-year timescale could be proposed after adoption of EQF on European level.

The Bulgarian Law of Vocational Education and Training provides for the overall development of the system of vocational education and training. Its principles are further developed in the state educational requirements, in the framework programs for acquisition of professional qualification, in the state examination programs for awarding a given level of professional qualification. National qualifications framework could be developed and successfully implemented by taking into account the existing legislation in this area, and by further development of the results obtained in the lifelong learning process. It is also expected that the national qualifications framework will establish the necessary link between the principles of the vocational education and training system and the concept of the national strategy for continuing vocational education on one hand, and the EQF on the other.

Sectoral qualifications

EQF could be considered as a framework for the individual's development as part of the lifelong learning process and its implementation would assist his/her professional improvement. In general, the EQF could be used for developments at sector level. Developments at this level should be mainly orientated towards the sectors' needs in different European countries and at European level as a whole. EQF could improve the transparency of the educational system in terms of qualification courses, and other types of qualification upgrading.

The basic approaches developed by the EQF could also be used for developments at sector level. It is expected that the sector frameworks will be developed in a way that is compatible with the national ones. Moreover, close cooperation among the main stakeholders (national education and training authorities, employers, professional organizations, etc.) should be established.

The EQF can be accepted as a working tool for developing the sector skills and knowledge by initiating the development of a sector based on competences qualification system, which is the base for the further vocational training. Defining the sector framework should include horizontal qualifications as well as vertical qualifications. In this case, the sector labour markets dictate the conditions and they are predestined. Taking in account the links between horizontal and vertical qualifications in a given sector and their corresponding descriptions appears a preposition for establishing an open, effective, and integrated system for vocational training in the context of lifelong learning and continuing improvement of skills and competencies. It will give assistance for overcoming the practice to duplicate certificates.

Stakeholders at sector level could be involved in supporting EQF implementation using the approach of the decentralized decisions and actions, together with procedures transparency improvement, distribution of responsibilities etc. Stakeholders at sector level could also be involved in supporting the implementation of EQF through informing them on the objectives and functions of the framework, as well as on the way that framework could be implemented, thus encouraging their active participation. In general, the existing sector qualifications are recognized at national level. Developing the sector frameworks of qualifications supports the development of a system for recognition of qualifications acquired by non-formal and informal learning and by training on the work-place. Sector frameworks of qualifications will contribute for a balance between the initial and further vocational training to be achieved, as well as for mutual trust between the employers and the working power on the labour market.

In the field of secondary general education, a national qualification framework for lifelong learning could be developed through definition of learning outcomes for different national education levels, by taking into account the learning outcomes, skills and competences defined in the EQF.

It is expected that the EQF would orientate, inform and promote the development of vocational education at sector level. It is also expected to define a set of criteria for content, assessment and certification of vocational competences thus assisting both compatibility and transfer.

In the field of Transport all existing qualifications in Bulgaria meet the characteristics of the international ones and follow their development. Several institutions in this area are certified according to the international standards and their qualifications are internationally recognized. Thus we do expect that the EQF will further encourage their development.

As to the medical professions covered by the Directive on professional qualifications adopted on June 6 2005, they should be recognized according to its basic principles.

The EQF can be used as a tool for refreshing the skills, knowledge, and competencies on sector level by

- ◆ Developing a system for monitoring the changes of the qualifications on sector level
- ◆ Establishment of consultative bodies on sector level for defining as the sector frameworks as well as the horizontal qualifications. They should include government representatives, social partners, and training providers.
- ◆ Development of the educational and training structures in accordance with the EQF principles
- ◆ Development of a credit transfer system on sector and inter-sector level
- ◆ Development of an institutional body for evaluating the final outcomes from the process of acquiring a given qualification in view of the national and sector qualification frameworks
- ◆ Defining the links between the initial and further vocational training

Applying the framework on sector level should contribute for developing the principles for

- ◆ Transparency of competencies
- ◆ Comparability of skills and knowledge
- ◆ Adaptation to the changeable requirements of the European, national and sector labour market
- ◆ Credit transfer between the qualification levels and between the qualifications by themselves / there is no credit transfer system for vocational education and training in Bulgaria/.
- ◆ Guarantying the quality of qualifications on a given level by improving the system for evaluation of competencies
- ◆ Development of career paths for acquisition of international sector qualifications in the fields of environment saving, electro- and telecommunications, ICT, transport, etc.
- ◆ Developing the systems for accreditation of institutions, programmes, and services in the field of education, training, and qualifications

Activities that should be done before implementing the EQF on national level are on national, sector, inter-sector, and regional level. It is necessary to define the national framework taking in account the sector qualification frameworks. Also the regional experience in development of qualifications should be taken in account in developing the sector qualification framework.

Leading institutions in developing and applying the sector qualification frameworks are the national trade associations of the branches of employers and workers. Their representatives participate in the consulting bodies on sector level, working groups for introducing EQF and in the national coordinating body. Stakeholders at sector level could be involved in supporting the implementation of EQF through informing them on the objectives and functions of the framework, as well as on the way that framework could be implemented, thus encouraging their active participation.

How can the link between developments at sectors level and national qualifications be improved?

There is a link between development of sector and national qualifications in Bulgaria. The EQF provides for optimization of the link between the sector initiatives and the national qualifications.

It is recommendable that sector initiatives should be developed in a way to be comparable to the national framework. At the same time the EQF underlines that its implementation is a responsibility mainly of the national institutions. Establishing a link between the sector and the national framework of qualifications requires closer co-operation between all stakeholders and on a first place co-operation with the national bodies responsible for education and training. It can be implemented by establishing a national coordinating body as well as consulting bodies that are suggested above.

The role of EQF with respect to the link between the sector and national levels of qualifications is as follow

- ◆ To ensure a common recommendable position, which to orientate, inform, and promote the development of the education , training and learning on sector level, taking in account the sector needs on national and European level
- ◆ To link the sector and national levels of qualifications
- ◆ The decision for commitment of the sector initiatives to EQF should be decentralized and to be done by the stakeholders, the institutions that they represent, including the state representatives responsible for the qualifications on national level
- ◆ Criteria for linking the sector framework with EQF should be transparent and external institutions (as national authorities, corresponding competent bodies) should be able to evaluate whether the negotiation engagements are implemented.
- ◆ The link between the qualifications, the sector frameworks and EQF descriptors of degrees to be clear and visible
- ◆ If it is possible, the link between the sector frameworks and EQF to be directed to the corresponding parts of the EUROPASS portfolio and any future developments of EUROPASS to foresee the needs of the sectors for transparency of qualifications.

The existing processes and bodies on European level should be used as more as possible in commitment of EQF with the sector and national frameworks. The decentralization process, the transparency of procedures and clear obligations related to criteria for participation should be a key element of this approach. It should be possible for all the participants as well as for the users to understand the engagements on this level.

Mutual trust

EQF practical implementation would undoubtedly contribute to the development of mutual trust. It is mainly related to the development of a common quality standard for assessment and will further increase the comparability of the qualifications. The increased transparency of the educational process ensured by the EQF will assist all participants in the educational process and more precisely the learners themselves. On the other hand training institutions should also be well informed about the content of the EQF and should be able to award final documents containing information on the level of knowledge and competences acquired by the learners. The existence of the EQF will facilitate the recognition of qualifications awarded in other European countries.

The importance of lifelong learning together with the necessity for qualifications transfer across institutional, system and national borders underline the importance of an integrated European system for credit transfer and accumulation. The EQF is closely related to individual's needs for lifelong learning.

EQF could contribute to mutual trust development through implementation of the principles of the National qualification frameworks. Development of national legislation towards transparent mechanisms and instruments for quality assessment and lifelong learning will guarantee mutual trust between the participants in the process of lifelong learning at all levels.

The reference levels as defined by the EQF would assist national qualifications framework development. These levels will also assist trainees and workers in the process of their carrier planning. Last but not least, the development of national system for credit accumulation and transfer will assist mobility and realization at the European labor market in compliance with the national qualification acquired. The development of the national qualifications system will also increase individual's motivation for lifelong learning, as well as the mutual trust among the participants in the training process – individuals, education and training providers, education and labor authorities representatives.

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Actions on national level in order EQF to perform its functions as a tool for mutual trust are as follows:

- ◆ Analysis and evaluation of the national legislative documents

In the field of vocational education and training in Bulgaria they are: qualification degrees definitions, framework programmes related to the national qualification programme under the Law on Vocational Education and Training (VET), a List of professions in VET, the state educational requirements for acquisition of qualification by professions, etc.

- ◆ Analysis and evaluation of the national achievements in realizing the basic principles and procedures in the key areas (quality of education and training, validation of non-formal and informal learning, improving the key competencies, information and consultation processes, etc)

- ♦ Developing a Plan for Development of the national and sectoral qualification frameworks, in accordance with the EQF, with participation of all the responsible parties and all the stakeholders

How can the EQF become a reference to improve the quality of all levels of lifelong learning?

The EQF ensures a common and conceptual approach in formation and practical realization of the policies in the field of education and training. Adopting EQF creates a base for unified informing and mutual understanding between the institutions and the participants on European, national, regional and sector level. It will allow an optimization of the links between them. By this way, the EQF will contribute for active fusion of the efforts in order to improve the quality and public recognition of the results from this process, as well as for recognition of qualifications. It is a necessary preliminary condition to decrease the learning barriers and better use of existing knowledge, skills and competencies.

As a meta-framework, the EQF gives to the national and sector frameworks the opportunity to connect and to communicate each to other. It will ease the transfer, transparency and recognition of qualifications. It is a good base for improvement the levels in lifelong learning framework by precise defining of all the components in the national framework and by achieving stability during the process of negotiations on national level.