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European Qualifications Framework (EQF) - Danish comments on the European Commission's working document "Towards a European Qualifications Framework for Lifelong Learning" of 8 July 2005.

The consultation process in Denmark

Denmark has conducted a comprehensive consultation procedure with regard to the Commission's proposal, covering all areas of education, including various organisations representing the heads of educational institutions, consultative committees and the social partners on both the employer and employee sides. In connection with this the Commission's proposal was translated into Danish.

A national conference was held on 3 November 2005 in Copenhagen at which all relevant parties participated. Afterwards, as part of the consultation process, the participants had an opportunity to submit written contributions. The proposal was also discussed in the Government's special committee on EU matters in the area of education.

The consultation process yielded the following generalised reactions:

- In general the proposal was positively received as a significant contribution to, on a voluntary basis, 1) being able to increase mobility in the labour market from the perspective of lifelong learning, and 2) removing barriers based on differences in the comparison of national education and qualification systems.
- Attention was drawn to the lack of consistency with ECTS, which is primarily based on time measurement.
- There was also a desire for greater consistency with the descriptors in the Bologna system.

- The description of qualifications as learning outcomes was generally welcomed, but with some reservations from teacher organisations.
- Several people pointed to the need to develop frameworks at the national level (preferably just a single one) to be able to benefit from the EQF.
- The division into 8 levels to describe qualifications met with general approval. However, attention was drawn to a need for adjustments in relation to overlaps, ambiguities, complexity, the correct progression and level of detail.
- There was generally a critical attitude to the “descriptor” “personal and professional competences”. It was not considered adequate in as far as the description of, in particular, management skills is concerned, and should therefore be revised. At the same time it was pointed out that modern competence requirements should be included in the description. This refers to competences such as communication skills, presentational skills, teamwork and knowledge sharing. These are emphasised in the objectives of the Lisbon Strategy as important requirements for ensuring a competitive European knowledge society in future.
- Table 2 presents a problem in this regard as it is first and foremost input-based rather than output-based.
- The correct use of a number of national tools as systems for quality assurance, validation of real competence and formal/informal education were emphasised as important requirements for the success of the EQF.
- It should be ensured that there is time and capacity for a thorough testing of the EQF through an agreed trial period with the development of national frameworks for qualifications described in terms of learning outcomes.

It should also be noted that all the participants in the Danish consultation process with regard to the Commission’s proposal considered it important to emphasise that the EQF must not become a static instrument, but should be continuously developed in line with new requirements with regard to the recognition of qualifications for lifelong learning at European and national level. Only in this way can the objectives of the Lisbon Process be realised in a dynamic Europe.

Provisional general assessment

Denmark welcomes the Commission’s proposal for an EQF as a useful tool to promote important general objectives for future education in Europe: increased transparency and mutual recognition of qualifications with a view to increased flexibility and mobility in the European labour market and between education systems. We were also pleased to note that the common framework describes qualifications for lifelong learning on the basis of learning outcomes (and is therefore output-based) through the use of a set of hierarchically structured reference levels – eight in all.

At the same time we are aware that the proposal for a common European EQF places emphasis on the national systems of the individual countries and their ability to describe qualifications in a way which makes it possible to relate a qualification in one national education system to a corresponding qualification in another.

In this connection we have noted the Commission's underlining of the fact that the EQF will be set up and implemented on a voluntary basis. It must be emphasised how important it is that the EQF is thoroughly tested over a trial period of several years. In this way the Member States will also have time to develop their own systems for describing qualifications in terms of learning outcomes.

We consider it a clear benefit that the EQF can also be used to develop sectoral frameworks for qualifications, again on the basis of a description of learning outcomes.

A national framework for describing qualifications in terms of learning outcomes will be able to clarify the relationships between different qualifications and opportunities for lifelong learning. Greater flexibility will thus be achieved both for individuals and for the European education and labour market as a whole.

The Commission emphasises the importance of the fact that the EQF requires work on the development and use of a number of tools at European level:

- Quality assurance – common principles at European level
- Validation of non-formal and informal learning
- Guidance and counselling on lifelong learning
- Development of key competences – first and foremost linguistic – as a necessary condition at all levels
- An integrated credit transfer and accumulation mechanism for lifelong learning
- A system based on reference levels
- Increased use of the Europass portfolio of documents.

Of these we regard, in particular, the work on an integrated credit transfer and accumulation system as difficult. At the same time we in Denmark take the view that work should be done on developing and testing these tools in independent fora separate from the decision-making process of the EQF. They should also be further developed/implemented at national level.

Specific comments on the Commission's questions.

The rationale of an EQF

- *Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?*

As mentioned in the opening remarks, Denmark supports the attempt to set up a common European qualification framework for lifelong learning on the basis of learning outcomes. We consider that, in principle, the Commission's proposal fulfils the general objectives: to contribute to creating increased transparency and mutual recognition of qualifications across national systems. This will contribute to achieving the objectives of the Lisbon Process both to improve mobility in the European labour market and to increase transparency among the various education systems of European countries. This diversity creates the need for a common tool to be used on a voluntary basis, such as foreseen in the proposal.

- *What is needed to make the EQF work in practical terms?*

If the EQF is to be able to work as a relevant "translation device" in practice, it would be advisable to test the system through a trial period at European level with subsequent adjustment according to the results obtained. The active participation of all stakeholders, both in the education sector and the labour market, is necessary in connection with this. At national level there is a need for easily accessible information on national educational qualifications described in terms of learning outcomes.

The EQF may be said to be an ambitious proposal from the Commission, involving not only the central aspects of a European classification system for qualifications, but also the clarification of real competences at all levels, flexible education paths and access to lifelong learning at all levels.

The reference levels and descriptors

- *Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?*

At first a reference structure with eight levels appears to be able to cover the complexities in the area of lifelong learning in Denmark. Denmark notes that there is an inconsistency between the "Qualifications framework for EHEA" (the Bologna QF) and the EQF, with regard to the number of levels which typically describe higher education qualifications. In the EQF the top four levels (5 to 8) relate to qualifications which are typically achieved through higher education, while in the Bologna QF there are three levels of qualifications in higher education.

In the context of Denmark, short higher education courses will thus be placed at two different levels in the two European qualification keys.

- *Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?*

The EQF is presented as a framework based on qualifications which are based on three types of learning outcomes: knowledge, skills and (the somewhat broader) personal competence. The descriptions of the eight reference levels in Table 1 includes competences (such as management skills) which are seldom learned formally or examined through an educational course, but which are important for a particular job. Further work should therefore be done on the description of the descriptors at the eight levels before the Commission presents its draft

eight levels before the Commission presents its draft Recommendation in 2006.

As the EQF is a framework for qualifications it is important that the table is designed in a way that describes competences which are included in a qualification. It should also be made clear how to determine the overall level of a qualification – expressed, for example, in terms of a particular grade – which contains individual components at different levels.

- *What should be the content and role of the ‘supporting and indicative information’ on education, training and learning structures and input (table 2)?*

Since the objective of the EQF is to develop a “translation device” for national qualification frameworks on the basis of learning outcomes/resulting competences and not on the basis of learning processes and learning structures, there is a problem with Table 2 in the EQF. Because qualifications are national, it is not possible at European level to lay down common frameworks for learning processes and structures for qualifications at different levels. The recognition of qualifications at an intergovernmental level should be based on the learning outcomes of the qualifications and not be dependent on whether learning processes and structures correspond to national ones. A table corresponding to Table 2 can be included in the national qualification frameworks because frameworks can be laid down for learning processes and structures at national level. We are, on the other hand, doubtful as to whether it should be included in the text of the Commission’s forthcoming Recommendation.

- *How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?*

Denmark has not, in general, attempted to match national and sectoral qualifications to the proposed levels in the EQF. For Danish higher education we have drawn up a qualification key which is consistent with the Bologna QF in as far as long and medium-length higher education courses are concerned. The Danish levels for higher education do not therefore match the levels for higher education in the EQF (see also the response above with regard to Table 1).

National Qualifications Frameworks

- *How can a National Qualification Framework for lifelong learning – reflecting the principles of the EQF- be developed in your country?*

In Denmark we are in the process of considering whether to establish a common national qualification framework.

Some experience has already been gained in higher education because through the Bologna Declaration and the subsequent ministerial communiqués an undertaking was made to draw up a qualification key, on which work shall commence by 2007 and be completed in 2010. But the question is also being considered for other areas of education, not least vocational education, which is already under way through the Copenhagen Process.

- *How, and within what timescale, can your national qualifications systems be developed towards a learning outcomes approach?*

Learning outcomes are already used to a considerable extent in the Danish education system (for example, in all the long higher education courses) together with input factors such as admission criteria and length of education. In the long term the development of an EQF may be expected to intensify the work in Denmark on using learning outcomes to a greater extent as a basis for measuring and comparing qualifications for lifelong learning.

Sectoral qualifications

The EQF can indeed make a constructive contribution to the development of sectoral networks and the description of qualifications within them. The decentralised structure, in particular in Danish vocational education, where the social partners participate in the development and control of education at all levels, provides great flexibility and at the same time continuously presents education with the challenge of being able to match new competences. Here the EQF can be a useful tool for describing the qualifications which are necessary in a given situation.

Mutual trust

- *How can the EQF contribute to the development of mutual trust between stakeholders involved in lifelong learning – at European, national, sectoral and local levels?*

The EQF may be expected to increase trust between the stakeholders at all levels, not least by placing emphasis on the position of qualification descriptions in the national systems seen in relation to a European context. The exchange of examples of good practice in European countries will enable the Commission, through an evaluation of the examples and the possible subsequent adjustment of the EQF in relation to them, to increase the usefulness of the EQF.

The present proposal for an EQF, however, is rather complicated. There is need of a simplification if general confidence in the EQF is to be preserved and enhanced at all levels.

It should also be pointed out that it is necessary to continue working on the development of tools for the quality assurance of national education systems so that they do not become devalued.