



European Association for the
Education of Adults

TOWARDS A EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING

An EAEA Response to the European Commission Staff Working Document

The EAEA welcomes the European Commission's initiative which is of great importance in a Europe that is steadily growing together with higher mobility of its citizens and with an increasing need for transparency in systems and activities.

The EAEA sees the potential of the EQF as a neutral framework or reference basis for any qualification and all educational systems in European countries without preference or rejection of a specific system. A common European framework will support the development of education and training systems and will also have a considerable influence on the quality of education and training providers and their competitiveness.

With reference to the questions in the consultation, we wish to respond to some of them:

1. The rationale of an EQF

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

The EAEA welcomes the clear support of the EQF for Lifelong Learning. We equally appreciate the importance given to non-formal and informal learning within the scope of lifelong learning.

We see the most important objectives and functions fulfilled, in particular the objective of strengthening mutual trust between stakeholders and the mobility of learners.

We see, however, the risk that the EQF tends to foster the economic and labour market oriented perspective and work-related mobility. A qualifications framework and the validation of non-formal and informal learning have a wider scope and should not be reduced to the labour market and economic purposes.

1.2. What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?

The EAEA acknowledges the benefits of a European credit system which builds on the experiences of existing tools like the ECTS. The procedures and instruments have to be further developed in order to encompass outcomes in non-formal and informal learning.

Some definitions need further specification, as for example the definition of learning in art. 3.1; see also the statements of EAEA members.

The EAEA would like to see the involvement of users, i.e. a need identification study or similar. Learners have a right to know the developments on European and national level that enable them to evaluate their learning outcomes and to make use of them in other environments. The present consultation does not allow for a larger investigation into user needs; this should be a major issue in the future. The interests of learners concerning a Europe-wide recognised certification of their knowledge and competences should be in the focus. Education and training providers as well as business should equally be involved since they will be interested in a comparability of qualifications and Europe-wide recognised certifications (although we have to admit that not all organisations in the labour market are really interested in comparing qualifications on European level).

A similar study could at the same time serve as a wide dissemination strategy to raise awareness and interest of learners and civil society as a whole and to show the benefits of an EQF.

An important factor is quality assurance concerning learning offers, i.e. providers, and validation of learning outcomes, i.e. recognition bodies and agencies. The principles of quality assurance need further development, in particular to cover non-formal learning.

2. The reference levels and descriptors

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

Our experience proves that concise and specific competences can be measured and assessed. In this sense, we welcome the 8-level reference structure that will have a considerable influence on re-shaping national systems.

We would like, however, to see non-formal and informal learning be integrated also above level 4; knowledge and competences on higher levels cannot only be attained in higher education or in high-grade work places.

We also suggest a review of the criteria of the 8 levels in order to ensure the complete consideration and assessment of 'soft skills' and other competences.

We should not lose out of sight an ongoing updating of the EQF.

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

The EAEA welcomes the decision to base the level descriptors on learning outcomes. This will cause some problems in countries where the formal education and training process is the basis rather than what has been learned. It will, however, enable comparability between systems and most of all it will enable learners to assess their learning progress.

Nevertheless, the descriptors could be reviewed to make them more learner-oriented.

2.3. What should be the content and role of the 'supporting and indicative information' on education, training and learning structures and input (table 2)?

Rather than serving as a first check list we don't see a benefit in this table. We would rather prefer a substantial familiarisation of future assessors with table 1.

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

3. National Qualifications Frameworks

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

The present document assumes that national qualifications systems exist in all European countries; this is not the case. And where they exist they are based on different criteria. Therefore, there must be sufficient time for national authorities to develop their framework and/or to adapt it to the EQF. This presupposes a large consultation with all stakeholders and with users.

3.2. How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?

4. Sectoral qualifications

4.1. To which extent can the EQF become a catalyst for developments at sector level?

The EQF will have the potential of becoming a catalyst if there is really a need for it; this means that a needs analysis study with final users has to be made.

4.2. How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?

4.3. How can stakeholders at sector level be involved in supporting the implementation of the EQF?

One group of stakeholders will certainly support the EQF, namely education providers. Education and training today is largely organised by private business that is highly interested in opening new groups and markets. They are interested in referring to a European, or even international, reference structure, and therefore support its development.

4.4. How can the link between sectors development and national qualifications be improved?

5. Mutual trust

5.1. How can the EQF contribute to the development of mutual trust (e.g. based on common principles for quality assurance) between stakeholders involved in lifelong learning-at European, national, sectoral and local levels?

With a new qualifications framework on European level a number of old and new stakeholders will get involved in the development of qualifications, their offer and quality. This will result in an intensive exchange of experience and cooperation.

The EQF will exert influence on the national qualifications systems if sufficient time is planned for testing, reviewing and implementing.

The EQF does not want to encompass detailed descriptions of particular qualifications nor be a device for making final decisions on recognition (art. 4); the question remains open, however, who will relate national qualifications and competences to the EQF. This refers to intensive cooperation between all stakeholders and the definition on who is entitled to recognise and certify knowledge and competences.

If the EQF remains a parallel system close to national certification structures it will not be of major importance insofar as national recognition is closely related to certain rights in the

education and labour market systems. Therefore, stakeholders, and in particular national authorities, have to decide whether to really take the EQF as the reference system.

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

Quality improvement and assurance are major issues for the EQF and also for other qualifications systems. Parallel to the further development of the EQF manageable tools should be developed to improve and assess quality.

There is also the decision which rights are connected with the acquisition of a certification, and who grants these rights. Usually, a formal recognition allows for (re-)access to education and training, a (better) work place, a better salary or similar.

If we don't want to link all learning and recognition of learning to economic or labour-market purposes we have to specify the benefits of the EQF in particular for non-formal and informal learning.

Final remarks

There are several retentions, e.g. the more concise definition of competences could lead to a devaluation of qualification; traditional educational systems with formal exams would be derogated; and assessing outcomes in informal learning would almost be impossible.

The learner, i.e. the final user and beneficiary of the EQF is not involved; counselling and guidance will be of high importance and need if the EQF wants to be a widely used reference framework.

The learner needs in particular help with processes of informal, and partly non-formal, learning. Self-reflection accompanied by intensive counselling and a self-critical attitude can give a feedback of what has been achieved in informal learning.

The 8-level reference structure seems partly very abstract and we see difficulties in applying the criteria to selected learning events and outcomes; this refers mostly to non-formal and informal learning.

The implementation of an EQF in the future has to be accompanied by training offers to all persons and organisations involved, which is not yet mentioned; we have, however, similar experience with the Common European Framework (CEF) for languages.

We see in the future a European system encompassing, measuring and assessing all steps of lifelong learning, which, in a way, seems very optimistic and on the other hand is thought-provoking: measuring and assessing everything may risk to foster the economic criteria of education and training and to displace values like creativity, sociability, sensuous receptivity, profundity of reflexion and other.

We should leave room for civic and cultural education that is not measurable, cannot be systematised and certified knowing that an educated and cultured individual is more than the cross total of his/her qualifications certificates.