

eficert position on the working document from the EU Commission: Towards a European Qualifications Framework for Lifelong Learning

eficert is a European sectoral initiative which develops standards and qualifications for the financial services sector. Building up on established national qualifications, sectoral standards are defined and certified at European level in a joint reference framework, the aim being to satisfy international market needs. So far, two qualifications have been defined at two different levels in the financial services sphere (Financial Adviser and Financial Planner). These qualifications take their references from the sectoral framework, including both the NQF and the EQF. That is why eficert takes a great interest in the development of a possible future European qualifications framework and welcomes the opportunity to take part in the consultation process. 22 partner organizations from 18 European countries are organized in eficert. (see www.eficert.org)

The basic principle of the EQF

eficert supports the key objectives and functions of the EQF. The desired promotion of transparency and mobility is generated primarily through the interaction between the EQF and NQF and the sectoral qualification framework.

Apart from making the educational systems more transparent, the reference to the European labour market must be emphasized more strongly. Competences should be formulated with a view to employability. For that purpose, the descriptors must be guided by the ability to pursue a particular occupation. Qualification processes with an immediate bearing on employment must be given adequate attention as compared to school systems.

For the implementation and acceptance of EQF in practice, the inclusion of sectoral initiatives taken by economic actors is vitally important. They are the link with national education systems and are the key to acceptance of the EQF. The proven national terms of reference and regulatory powers which enjoy general support must remain valid in future.

The reference levels and descriptors

The EQF is to be a qualification framework based on the principle of lifelong learning. This must be reflected, firstly, in the number of reference levels and secondly – by analogy with an educational biography – in an appropriate distribution of the reference levels. We regard an eight-stage system as being appropriate.

In this proposal from the EU-COM, four stages of basic qualifications are defined, together with four stages of overall gainful activity or further education. In that perspective, due allowance must be made for lifelong learning and professional experience in that the 8th (or highest) reference level cannot be achieved solely through formal qualifications of academic and occupational training, but only by gaining additional professional experience. In principle, each level must be attainable by a variety of educational routes, i.e. academic education must not generate an automatic entitlement to level stages.

In setting out the descriptors for the individual levels as shown in Table 1, the EU Commission's approach points in the right direction. The descriptors stipulated here are intended to describe typical learning results for a particular reference level. However, the present proposal from the EU-COM shows a weakness in the determination of the reference levels which cannot be clearly differentiated in some cases. In addition, the acquisition and development of competence for occupational activities at each reference level are, in our view, still lacking. As competences cannot be measured precisely through qualitative descriptors, a quantitative descriptor should be added. Following the "workload concept", a performance points system (ECVET) should be introduced to determine the average learning effort needed to develop the necessary competences.

A variety of input- and output-based educational systems exist today. Eficert regards the output-based approach as being by far the better basis for an EQF. The attempt made in Table 2, by way of example, to provide guidance is not valid in our view as this table is open to widely varying national interpretations.

The association of qualifications with a reference level should take place in a process which always makes allowance for the sectoral qualification frameworks as well as the NQFs and EQFs. Determination of occupational activity levels in branches which are active internationally requires a consensus extending across national borders.

National qualifications frameworks

From the Eficert standpoint, national qualifications frameworks should not simply represent a reference system for the EQF. In addition to the transposability of different national qualifications, they should also enhance the possible gateways between different educational routes; that would certainly be conducive to promotion of the idea of lifelong learning. As a European organization, Eficert cannot comment further on the NQFs.

Sectoral qualifications

By the term sectoral qualifications, we understand qualifications in a particular branch of the economy. European sectoral organizations have already put in substantial preparatory work for the determination of comparable qualification levels. Sectoral players such as eficert can support the introduction of the EQF by reproducing their qualifications frameworks in appropriate preliminary trials in the EQF and comparing the result with their experience. Conversely, EQF will assist the development of knowledge, skills and competences, because the European overview across sectoral and national borders will enable gaps to be discovered. Sectoral and European developments will therefore be able to constantly enhance national qualifications.

eficert will be happy to take part in the further development of a possible future EQF.

Mutual trust

Mutual trust is generated by transparent structures and personal contacts. The essential key here is that the actors must know and accept each other. That is one reason why sectoral actors should be involved.

Mutual trust will have to be developed primarily for the purpose of associating the national qualification systems with the EQF. To achieve that aim, existing instruments promoting transparency, such as sectoral initiatives, should be used as the foundation.

The introduction of a performance points system comprising all the reference levels of the qualification framework would also make for greater comparability and might therefore be able to make an essential contribution to mutual trust between the individual areas of education.