

European Qualifications Framework

Consultation Response Form

Please tick if you want us to keep your response confidential.

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Please check one of the boxes that best describes you as a respondent:

<input type="checkbox"/> Secondary Education	<input type="checkbox"/> Higher Education	<input checked="" type="checkbox"/> Vocational Education
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Please Specify:

This response is a summary of the views of the representatives of the European Forum for Vocational Education and Training (EfVET). The EQF was discussed by members in two workshops at the EfVET Annual Conference in Budapest in October 2005. Subsequently, members have submitted comments to be included in this summary following specific events organised in several member countries. Members have also contributed views to national consultation processes. The response is endorsed by Hans F.van Aalst President of EfVET.

1 a) 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?

Yes for the most part

No

Not Sure

Comments:

It is necessary to state that this is a 'yes-no' question, which does not allow for an intermediate response. It would be better if there was some classification of the objectives and functions of a EQF, such as 'desirable', 'acceptable' or 'unacceptable', but there is no indication that the Commission will respect this classification in the analysis of responses.

In general the EQF is a sound backcloth and a reference point. It gives sound guidance to any country which does not have a framework. It also has value within a country to support occupational frameworks. Where it falls down is in the direct comparison of qualifications. It can say nothing with regard to content. For example, does the UK Level 3 plumber have the same technical skills as a French Level 3 plumber, have they used the same equipment or occupational skills? It is only possible to say that conceptually they are operating at similar standards. There is nothing to show that they have a common understanding of legal or Health and Safety issues.

There is a need for a structure, however, as a necessary step towards Europe strengthening its competitiveness in the global economy. It is essential to facilitate the mobility of employees and trainees and this will also strengthen competition within the Single Market.

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

Comments:

Again the question has only meaning if those surveyed have the opportunity to clarify their position concerning the objectives and functions assigned to the EQF. These objectives and functions are not treated in the consultation documentation.

The EQF focuses on the individual by valorising flexible, diverse and efficient ways of learning. It could stimulate lifelong learning and create a durable integration into the labour market and society in general. The EQF has to be a clear instrument, that is transparent, not only to experts, but also to the citizen.

The EQF should not become a bureaucratic or rigid system

A difficult question is whether, for the medium range, the EQF will involve rights for the individual concerning entrance to the labour market and/or academic qualifications. The EQF is constructed thus far as a tool for communication on the

level of acquired qualifications. Will the learner have the right to access certain courses based on previous qualifications gained at a specific level
In terms of right of access to the labour market, the directive on the recognition of professional qualifications is decisive. Building coherence between the EQF and this directive is a important development for the future.
The EQF is built more on individual learning paths. For individual learners, the identification of learning needs, the establishment of a learning path and the steering of their own learning process are difficult tasks. The individual will also be responsible for matching his/her qualification with the requirements of a job and the labour market. Too much emphasis on the individual's responsibility could cause difficulties. There needs to be a balance between individual and collective responsibilities. In conjunction with the EQF, there need to be comprehensive information, guidance and orientation systems. These must be accessible to all.
The EQF will stimulate more mobility, which at the moment is primarily amongst the unskilled and the highly skilled.. The social cohesion of Europe requires that all the acquired qualifications should be recognised and that the competences of unqualified persons should be valorised in the labour market.

The reference levels and descriptors:

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

X Yes

No

Not Sure

Comments:

This purely a technical question. An 8 level structure would seem to be appropriate to cover the range of qualifications in question.

2 b)

- Do the level descriptors, in table 1 of the consultation document, adequately capture learning outcomes and their progression in levels?
- What should be the content and role of the 'supporting and indicative information' on education, training and learning structures and input (in table 2 of the consultation document)?
- How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?

Comments:

This again is a 'yes-no' question which does not allow an intermediate answer. Table 1 is based on a typology of competences which has to be accepted or rejected. There is no room for possible draft amendments. Where are the links between the future EQF and the future EQF for higher education as agreed in Bergen?

Before analysing the contents of Table 2, should consideration not have been given to the relevance of building such a tool at the European level? Respecting the subsidiarity principle, is it not the responsibility of each Member State to produce a tool of this type? Is the proposed tool in contradiction to the outlined European meta-framework?

There are some apparent discrepancies in the translation of terminology or have meanings changed? For example, to define the English word 'matched' in both text and questions, the French text has 'harmonisées' and 'mis en relation' in the questions.

The EQF should contribute by creating more chances for the most vulnerable groups in society (poorly skilled and unskilled workers) The EQF must have entrance levels defined to stimulate unqualified persons to enter into lifelong learning.. This supposes good integration of the lower levels/basic competences in the EQF.

It is important that the descriptors of the qualifications levels should stem from a broad concept of competence. The competence levels used in the EQF and a national/ regional framework have to include the concept of durable employment. It is essential that these national/regional frameworks reflect a basis for common understanding and the education systems reflect its principles. The EQF/NQF offers an instrument to regulate and integrate new educational (public and private) institutions into the regular educational structure.. It is also the basis for mutual recognition of qualifications both between different sectors (education, training, human resource management) and between Member States.

Education cannot be reduced to a qualification structure since citizenship, personal development, critical attitudes and meta-competences are essential parts of every education programme.

3 National Qualifications Frameworks

- How can a National Qualification Framework for lifelong learning – reflecting the principles of the EQF- be developed in your region?
- How, and within what timescale, can your national qualifications systems be developed towards a learning outcomes approach?

Comments

In the **Czech Republic**, the National Qualification Framework is in a preparatory process under the coordination of the National Institute of Vocational Education

In **Estonia** there is a national qualification system which is based on an agreed system of vocational standards. It includes IVET and HE as well as Lifelong Learning. In reality the system is not yet fully implemented and the range of qualification exams is not working in all areas. Some standards are still in the development phase.

In **France**, The Commission Nationale des certifications professionnelles has the objectives to create and update the National Repertory of Qualifications. The CNCP investigates, approves and registers all national and sectoral qualifications, initial and higher education, vocational training. It is working, but it takes a long time to gain the CNCP agreement.

Malta has an MPVQAC (Awards Council) and was empowered by Legal Notice LN215/200 to establish the Standards Development Board and the Standards Assessment Board. This Council was to streamline non-university, vocational awards provision. The terms of reference of the council have expired and a renewal is awaited.

Romania has no National Framework of Qualifications, but there are some institutions involved in this field.

The **Spanish** national structure is composed of five levels of qualifications, from IVET to Higher Education. There are different qualifications at every level. In the National Catalogue, there are some 100 different qualifications with time credits to gain these qualifications in the first three levels. The qualifications are linked to over 20 sectors of the economy. In the near future 70 new qualifications will be included in the Catalogue. Work continues on qualifications at levels 4 and 5.

This process is linked to developments in Europe.

The National Qualifications Framework in the **United Kingdom** (not Scotland) sets out the levels at which qualifications can be recognised. It helps learners make informed decisions on the qualifications they need, by comparing the levels of different qualifications and identifying clear progression routes to their chosen career. Only qualifications that have been accredited by the regulatory authorities are included in the NQF. A recent review has introduced the number of levels to

nine (entry level to level 8). The positioning of qualifications at the same level only indicates that they are broadly comparable in terms of general level of outcome; it does not indicate that they have the same purpose, content or outcomes. In development now is a proposed Framework for Achievement. This will encompass a much wider range of achievements and be underpinned by a system of credit accumulation and transfer. This will allow learners to undertake smaller units of learning and accumulate their achievements across Awarding Bodies and between qualifications. The proposals have been out for national consultation their implementation is under continuing review.

The Flemish Community in Belgium has no national framework of qualifications but in a recent policy document published by the Minister of Education is an announcement of the establishment of a univocal and transparent qualifications framework. There will be place for qualifications orientated towards the labour market and for qualifications orientated towards curricula. The design of this framework will be modelled on the EQF.

The French Community in Belgium has no framework currently. The various decision makers are trying to agree on a future project to develop an appropriate framework.

In **Italy**, there is no specific national structure whose aim is to certify knowledge and ability, like the one stated in the EQF. Regional autonomy influences the certification of professional qualifications. Work has been progressing for some time to move this certification into national oversight, with the involvement of all social and professional partners.

The structure in the **Netherlands** does encompass all formally recognised education and training and is quite flexible. There is a need to stem the tide of drop out rates from pre-vocational secondary education and the low numbers transferring to Higher Education. There could be difficulties over allocating the current Dutch levels to the EQF

The development of the EQF needs a timetable to encourage all States to devise first a NQF if one does not yet exist or adapt an existing NQF in line with the EQF. The mutual recognition of IVET qualifications has taken far too long and if the Lisbon VET Agenda is to be achieved in time to enhance European competitiveness on the global stage, then such a timetable must be adhered to. It should also remain a voluntary process to preserve the principle of subsidiarity in the national control of education.

4 Sectoral Qualifications

- To what extent can the EQF become a catalyst for developments at sector level?
- How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?
- How can stakeholders at sector level be involved in supporting the implementation of the EQF?

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

Comments:

The main principles of the EQF confirm that competences can only be really transparent when developed in a specific professional/vocational context. What are referred to as “competences, skills and knowledge” in the EQF will always have to be defined by sector, branch and professional-based specifications. Only from this starting point will the appropriate concepts be defined and applicable and understood in the European labour market. This is based upon the experience of countries which have developed NQFs

It is essential that all social partners, particularly employers play a role in developing the NQF and the EQF. Means must be found to involve SMEs directly and beyond representative groupings.

Initial drafts of structures must be widely circulated and all social partners encouraged to respond fully to the consultation processes. Results of piloting again should be circulated widely.

All stakeholders must have faith in the system and its credibility.

It is at local and regional level that a credible structure will be established and accepted by those for whom it is designed. These locally- and regionally-devised structures will have a strong influence on the national structures and in turn on an “umbrella” European framework.

5 Mutual Trust

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

Comments:

The essential consideration for the successful acceptance of the EQF is mutual trust. This will be even more necessary if a Credit Transfer system is to be introduced. There will probably be a requirement for peer exchanges, observation and analyses.

The quality of NQFs must be guaranteed by quality assurance systems at the

national/regional and then the European levels. There is a need for supporting instruments to guarantee the transparency and credibility. Accreditation or other forms of quality assurance have to be based on quality standards.

There are questions such as: What will be the profile of the quality assurance experts? – educationalists or sector experts?

Which criteria will be used? How will these criteria be determined? Is accreditation within the competence of each Member State or do we need exchange of international expertise?

6 Any other comments on the EQF proposal:

Comments:

Here are some other fundamental questions which need to be addressed:

Does the EQF encompass the recognition of acquired qualifications at the level of education and training and also at the level of employment?

Is it advisable that every Member State indicates the EQF level on every individually acquired qualification, so that Member States can estimate the correct level of the qualification?

It is necessary to have the same terminology for each qualification in each Member State?

Are the definitions clear enough for all countries and “cultures”?

What is the relationship between key competences (basic education) and the EQF?

Do all levels and sectors of education and training have to be linked to the EQF?

Do the descriptors in Table 1 give enough information to link national qualifications to the EQF

Will the sectoral qualifications be linked directly to the EQF or will this linkage pass through the NQF?

Are there enough safeguards to avoid an upgrading of qualifications in every Member State by linking national qualifications to the EQF? Who will supervise this process?

Will Member States or institutions, after linking to the EQF, be able to stipulate additional conditions to a qualification awarded in another Member State?

Should there be complementarity between the EQF and such tools as ISCED and SEDOC?

