

Response to the Commission of the European Communities Working Document Towards a European Qualifications Framework for Lifelong Learning

This is a response from the England, Wales and Northern Ireland Credit Forum

The EWN Credit Forum

The EWN Credit Forum comprises representatives of credit consortia and other bodies with a major interest in credit in England, Wales and Northern Ireland. It also includes a number of individual members who bring specialist knowledge of particular aspects of credit and qualifications in the UK and Europe. The interests of the membership of the EWN Credit Forum span the full spectrum of levels in post-16 education [further and higher education]. The HE members of the EWN Credit Forum published a set of EWN Credit Guidelines in 2001. More recently, a survey of HE Credit Practice in England, Wales and Northern Ireland (2004) has shown that the guidelines are widely applied in higher education institutions across England, Wales and Northern Ireland. The EWN Credit Forum acknowledges the care and industry that has been invested in this proposal and welcomes the opportunity to comment.

The response

1. The fundamental case for a single meta-framework is compelling

The EWN Credit recognises and accepts the need to establish a meta-framework for qualifications in Europe to which national qualification frameworks can relate. Within each country institutional and sector qualifications should relate to national frameworks. Therefore the meta-framework would serve as a tool to enable stakeholders (providers, students, employers and sponsors) to understand relationships between qualifications across Europe. The EWN Credit Forum finds this fundamental argument eminently sensible and compelling. It therefore supports this endeavour to create a suitable meta-framework which can encompass all forms of learning across a full spectrum of levels of learning. It also strongly concurs that just one such meta-framework is required and that this must incorporate the framework for qualifications in the European Area of Higher Education published in May 2005.

2. Does this document describe a meta-framework or a framework?

The EWN Credit Forum believes that the consultation document describes a fully fledged framework rather than a meta-framework. A meta-framework requires fundamental principles and broad parameters which can accommodate and therefore relate to national frameworks. It should not attempt to set finer detail that one would expect of a national qualifications framework where it is necessary to establish a full series of closely defined common reference points. In our view the meta-framework is over-specified to a significant extent. It would have a rigidity which would be counter-productive and damaging to the twin aims of generating assurance and confidence.

This is best illustrated by the common reference points. The EWN Credit Forum agrees that common reference points are needed for this frame. But we think that there should be fewer and that they should be more broadly defined. Eight levels of learning would be fine for a national qualifications framework but there are too many for the desired meta-framework. The task of attempting to match the precisely defined levels of the meta-framework with variably described levels of national qualification

frameworks would result in the input of much unnecessary industry and resource by national bodies. The outcomes may also become sources of disagreement and dispute because exact matches are unlikely. The reason for this is that correlations will be ultimately made by individuals using varied experience to make their interpretations. It will be unrealistic to expect reasonable consistency of interpretation right across Europe. A simpler position is necessary to reduce the likelihood of inconsistency.

We would recommend having just five learning levels. These would be the three broad HE 'cycles' agreed by the Bergen Ministerial conference (May 2005) together with two more levels located below the HE 'cycles'. With this structure of five levels most qualifications will come within a single level but it would be unproblematic to identify qualifications which span two levels. If a larger number of precisely defined levels are employed, the comparison between national frameworks and institutional qualifications becomes complicated as Figure 1 in the Consultation Document illustrates so well.

We appreciate that the authors have devoted much energy to devising eight levels but we believe deeply that it would be mistaken to establish so many levels with such a high degree of precision. We urge that a much simpler set of reference points is devised for this meta-framework.

3. The use of ECTS credits in the meta-framework

The EWNl Credit Forum is unclear as to the credits proposed for the EQF. ECTS credits could be an appropriate tool for the meta-framework. The advantage of ECTS credits is that they are broadly defined and do not have a series of associated credit levels. They can therefore be used in any learning context. Some countries have adopted them directly for HE while most, perhaps all, other countries expect to be able to articulate with ECTS credits. They are therefore suitable for providing the second dimension of the meta-framework. If a different form of credit defined there is an increased risk of confusion.

4. The exclusion of the Directive on professional qualifications

The EWNl Credit Forum believes that there is an inconsistency in setting out to provide a meta-framework for lifelong learning but exclude professional learning accredited under the Directive. We urge that this decision is revisited and reversed.

5. A list of responses to the specific questions posed by The Commission

- The most important objectives and functions to be fulfilled by the European Qualifications Framework are set out. There is a tendency to over-claim the advantages and benefits in a repetitive text.
- The most important qualities to make the EQF work are very clear principles [as set out in the document] and *simplicity* of meta-framework as recommended above.
- We believe that the 8-level reference structure is over elaborate and does not relate well to the Bologna meta-framework for the EHEA.

- The level descriptors do capture learning outcomes and progression but they are overcomplicated. They are unsuitable for a meta-framework.
- The supporting/indicative information is also far too detailed. This is more suitable for a national framework.
- Parts of the UK already have a full national qualifications framework (LLL) and this will extend to the whole of the UK in 2-3 years. The underlying principles are common with the proposed EQF.
- The position is well advanced in the UK. The Open College Networks have applied the principle of recognising achieved learning outcomes for 13 years. The Survey of HE credit practice (2004) revealed that all one hundred responding HE institutions apply a learning outcomes approach to the award of credit for learning achievement.
- In England the systematic development of knowledge, skills and competences is already well advanced in further education and in many higher education institutions. This is driven by the Sector Skills Councils, the Learning and Skills Council, the Qualifications and Curriculum Authority and the Quality Assurance Agency. This work is linking with the advanced Credits and Qualifications for Wales and similar developmental work in Northern Ireland. Scotland already has the national Scottish Credit and Qualifications Framework covering 12 levels and all forms of learning. The development of the EQF is consistent and helpful but clearly it is not a catalyst for the UK.
- The final form of the EQF will need to be acceptable to the government agencies and authorities. It should then be possible at a national level to agree the articulation of the EQF with the national qualifications framework. Bodies like NARIC in each country could then collect and collate and disseminate diagrams showing the correlation between national qualification frameworks.
- If the principles espoused by the EQF are accepted by countries and sectors then there will be an overall benefit to education and learning in Europe.

Paul H Bridges
 Chairman: EWNI Credit Forum
 16th December 2005
P.h.bridges@derby.ac.uk