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EUROPEAN QUALIFICATIONS FRAMEWORK - EQF
interim comments on the Commission Staff Working Document (SEC(2005)957)

GENERAL

The Commission published their proposal for a European Qualifications Framework SEC(2005)957 on 8 July 2005. The draft framework was presented to the EU education ministers at their informal meeting in July 2005. The Commission called upon the EU Member States to inform national stakeholders of the consultation on the framework and to contribute to it by commenting on it in writing by the end of 2005.

The Finnish Ministry of Education has disseminated information about the European-wide EQF consultation at different events, on its web site and in its web-periodical (over 90,000 hits per month). The Ministry arranged a consultation event on 19 October 2005. The Commission EQF proposal was discussed, and a statement was drafted by a tripartite Copenhagen process steering group, which is composed of representatives of the labour market parties, teacher and student organisations, education providers, rectors and the educational administration. Based on these discussions, the Ministry drafted a response to the Working Document. The draft has been open for comments on the Ministry's web site.

This response to the Commission Staff Working Document seeks to recapitulate the discussion conducted in Finland on the European Qualifications Framework and bring forth the first reactions to the projected framework.

The Commission proposal has aroused interest and generated discussion both about the proposed EQF itself and more widely about the comparability of learning outcome, diplomas and qualifications. Overall, it can be noted that at this stage the proposal gives rise to more questions than detailed comments or development proposals. One of the core questions appears to be whom the framework is primarily intended to serve. Is it intended to serve individual citizens, employers, education providers, authorities, guidance and counselling professionals, or perhaps all these groups? Is it possible to construct a sufficiently comprehensive framework catering for the needs of the different target groups without the frame of reference becoming too general? Or should a primary target group be chosen and the development carried on from that point of view?

From the individual's point of view, a frame of reference for learning outcome, diplomas and qualifications should promote the creation of personal study paths. This entails a practically oriented approach which would enable knowledge and skills acquired at

different points - in formal education and training, at the workplace and in other contexts - to be equated to the reference levels in a meaningful way.

In terms of working life, it is essential that a person's knowledge, skills and competencies can be assessed in recruitment. Just as important is to recognise the competencies of the staff already employed and continually develop their skills and knowledge.

An education/training provider needs a well-functioning system, for instance, to determine and recognise prior learning. The qualifications framework should promote the recognition of prior learning and knowledge of foreign students and students going abroad and facilitate the planning and pursuit of studies. The framework could be useful in the promotion of international mobility both during studies and after graduation.

For authorities, an important aim is to promote student and graduate mobility and to monitor, evaluate and develop the efficacy and effectiveness of the education system. The challenge in an European qualification system is to build up mutual trust among different countries' education providers and educational administrations. Based on the Working Document, it is fairly difficult to assess to what extent the projected EQF would add to trust, because it contains no proposals relating to its implementation.

The proposed EQF shifts the focus from the structures of education to knowledge, skills and competencies provided by education. This reflects the new direction in European education policy as a whole. The nationality of qualifications and the manner in which they are acquired are losing their significance, and it must be possible somehow to match each individual's learning outcome and competence to a reference level in the EQF. The foremost issues relate to the recognition and certification of knowledge and skills acquired outside the formal education system: whose responsibility this could be at national level and what body could verify its reference level on the European scale. For the introduction of the EQF to make sense, it should provide tools for identifying and recognising knowledge acquired in lifelong learning.

QUESTIONS POSED BY THE COMMISSION:

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

The European Qualifications Framework should bring added value with regard to the present classifications of degrees and recognition systems. For instance, ISCED 1997 already contains a classification of education levels and degrees. The OECD publishes annually country-specific descriptions of education. The foremost added value should, indeed, be to provide a framework for the identification and recognition of non-formal and informal learning.

At its best, the European framework could promote understanding of the relations between degrees and fields and facilitate international comparison and mobility. A well-functioning frame of reference could simplify credit transfer, improve the recognition of learning outcome and promote lifelong learning. It could also serve development by pointing out evaluation targets.

The aim of the Commission's proposal is not to harmonise European qualifications or education systems. The EQF might engender more uniform language and terminology and thereby facilitate communication about European degrees and diplomas, their core features and the knowledge and skills they provide. The EQF could also enhance the transparency of European degrees in relation to non-EU countries.

The Working Document lacks proposals for implementation. For the EQF to be a usable tool, it should contain a component providing guidelines as to how competence is assessed in practice and how the competencies provided by degrees are matched to the framework in practice. This is a very demanding task without comprehensive piloting. Field-specific pilots and pilots between countries should be undertaken for instance through the Framework Programme for Lifelong Learning. The pilot phase will take years, but it is through piloting that we can best assess whether the EQF would bring added value with regard to present systems and whether it would be applicable in practice in European educational cooperation.

The reference levels and descriptors

- *Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?*
- *Do the level descriptors, in table 1, 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 (table 2)?*
- *How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?*

Competence-based thinking and learning outcome are a good point of departure for the framework. The essential thing is knowledge and skills, not where they are acquired. It appears, however, that the EQF proposal contains both the idea of matching individual knowledge and skills to the reference levels (Table 1) and an official system for referencing degrees (Table 2). A challenge to be especially tackled in the development of the EQF is the matching of non-formal learning to the framework and methods of getting it identified and recognised.

No detailed discussion on the level descriptors has yet been conducted in Finland. Attempts to reference competencies provided by given degrees to the EQF have revealed that the learning outcomes of one degree could be matched to more than one level. Their placement on the reference levels depends on whether the assessment concerns knowledge, skills or personal outcomes. In terms of assessing the real knowledge of an individual, it could be important to match different components of learning outcome to different levels.

In addition to the development of the level descriptors, the Commission's proposal should pay attention to a user-friendly approach and instructions for the application of the EQF. The descriptions should be simplified and concretised.

National Qualifications Frameworks

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

The countries participating in the Bologna Process have committed themselves to starting the preparation of the national frameworks for higher education degrees by 2007. In Finland a Ministry of Education committee has drafted a proposal for a Finnish framework. After deliberations, the committee decided to describe higher education degrees by means of the work load involved, the level, the stated learning outcomes, and the eligibility for further education and the professional competence they provide, as well as how different degrees relate to each other. Learning outcome is divided into knowledge, which is examined in terms of extent and depth, skills (language and communication skills), and competencies, which are examined separately as cognitive, working life and ethical competencies. The Ministry sent the committee's report on an extensive consultation round. No decision has yet been made regarding possible national framework on the basis of the committee's proposal.

In addition, Finland has a system of competence-based examinations in the vocational education sector. It is used in vocational qualifications, further vocational qualifications and specialised vocational qualifications.

The Member States are ascertaining the need for possible national frameworks. The Commission's next EQF proposal should also allow for the possibility that some Member States interpret their own education provision only by means of the EQF and do not create national frameworks, if this is not considered topical at the present stage of education system development. The situation in each Member State is naturally influenced by the structure of the education system, the present degree structure and arrangements relating to the recognition of learning outcome and qualifications, and how these relate to the national education system as a whole. A challenge of its own in the development of national and European education systems is the ongoing change in knowledge demands and qualifications in response to rapid changes in working life.

The creation of a national framework would also entail constant updating. The work involved in this, e.g. appointing/creating the responsible national authority, could turn out to slow down or put a stop to the development of education and the application of the common framework. Based on the proposal, it is difficult to estimate the challenges involved in the maintenance of the EQF and the national frameworks and national bodies or networks it would require.

Sectoral qualifications

- *To which 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?*

The Commission's proposal reflects degree/diploma-based thinking and lacks a robust work-centred outlook, which makes it difficult to assess to what degree it would accommodate the demands of different sectors. At its best, the proposal could promote international sectoral cooperation, which is already very extensive, and create conditions for the identification and recognition of sector-specific qualifications. As the proposal is at such a general level, however, it is difficult to estimate how useful the EQF would be from the sectoral point of view. The expectations directed at the framework vary from sector to sector - no doubt the challenges facing health care are very different from those tackled by different technology sectors or agriculture. The situation within sectors varies considerably from one country to another.

An examination of the EQF gives rise to a number of questions. To what extent has the preparation of the framework been informed, for instance, by the work done in Cedefop to define sector-specific qualifications? As regards vocational education and training, the definition of sector-specific qualifications has led to fairly contradictory outcomes. Would it result in too heavy and complicated a system if the EQF addressed sectoral knowledge and competencies? Or should learning outcomes be described at a general level and the different sectoral demands addressed in a separate process in connection with the implementation?

As the framework in the presented form is largely built on qualifications and not on the knowledge and competencies they provide, it would be too much of a challenge to develop sector-specific knowledge on the basis of the EQF and there could be too much room for interpretation. As to branch-level qualifications, there are no indications as to what they could be.

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*

For mutual trust to evolve, the EQF should be in large-scale use in Europe and be understood in a sufficiently consistent manner in different countries. This in turn entails unambiguous and simple instructions which enable learning outcomes produced by different countries' education systems to be effortlessly linked to the framework. The demands are even greater as regards knowledge acquired according to the lifelong

learning principle, where the challenge is to determine the level of knowledge acquired at the workplace.

To be viable, the EQF requires a shared view of quality assurance. The framework can promote quality enhancement if a common view of quality assurance is shared to a sufficient degree, as regards both the evaluation of education provision and the assessment of learning outcome, and it can be linked to national quality assurance and its development.

As to Finland, it appears that at least the level descriptors do not bring any particular added value to the development of degree objectives. They are far too general for this.

IN CONCLUSION

The Commission's Staff Working Document does not contain proposals concerning implementation and its timetable. It does not take a stand as to how individual learning outcome is matched to different reference levels in the EQF and what kind of measures are needed to update the framework.

It is difficult to gain an overall picture and to assess the model based on the content of the Working Document. The usefulness of the tool is difficult to assess without knowing its function and without being able to consult the instructions. In future, attention should be focused on the respective responsibilities in assessment and the validation, or certification, of assessment. In Finland we have experience of qualification committees set up for the competence-based qualification in vocational education and training. It might be difficult to put in place a comprehensive system at national level.

In further discussion of the Commission proposal, special attention should therefore be paid to the way in which the model proposed in the Working Document would be used in practice. The proposal should also set out the responsibilities of different stakeholders and the division of work between them. Quality assurance warrants special attention as well. This would support the emergence of mutual trust in the implementation phase.

Discussion is further needed as to the relationship between the EQF and the Directive on professional qualifications. There is no indication how these are to be reconciled or what the timetable for this would be.

The development of the EQF must take note of the preparation of other projects (e.g. ECVET) and keep in touch with the networks already in operation.

The application and adoption of a qualification framework projected for very extensive use requires piloting in different operational environments on a sufficiently long term. Only this can bring certainty as to its applicability and sufficient flexibility in relation to Member States' education systems.

The national frameworks must be founded in national considerations. It should be possible to apply the EQF without creating new national frameworks.