

16 November 2005

UK higher education sector response to the European Commission's consultation: 'Towards a European Qualifications Framework for Lifelong Learning'

Introduction

1. This policy statement, produced by the UK Higher Education Europe Unit, sets out the views of the UK higher education (HE) sector on the European Commission's consultation on the establishment of a European Qualifications Framework for Lifelong Learning (EQF).
2. The UK HE Europe Unit (here after 'Europe Unit') is a sector-wide body which aims to raise awareness of the European issues affecting UK higher education and to coordinate the UK's involvement in European HE initiatives and debates. Launched in January 2004, the Europe Unit seeks to voice the views of the UK higher education sector in Bologna Process and EU decision-making forums. The Unit is jointly funded by Universities UK¹ and the three higher education funding councils of England (HEFCE), Wales (HEFCW), and Scotland (SHEFC). The Standing Conference of Principals (SCOP)² and the Quality Assurance Agency (QAA) also support the Europe Unit.

Introductory comments

3. The UK HE sector welcomes the principle of the EQF. In particular we agree with its high-level 'overarching' nature and its key role in reflecting the diversity of lifelong learning. However, UK HE has some concerns about its practical use by HEIs and potential incompatibility with the existing Framework for Qualifications in the European Higher Education Area (EHEA) agreed by Ministers in Norway this May under the Bologna Process. (See below)
4. The aim of the EQF proposal in increasing transparency and supporting mutual trust is to be welcomed. Indeed, the proposed EQF, in seeking to

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¹ The rectors' conference for UK universities.

² The Standing conference of principals SCOP is the representative body for higher education colleges in England and Northern Ireland.

enable greater articulation between education sectors - and in particular between vocational and higher education - is laudable.

5. We welcome the proposal in clearly contributing to the goals of the Lisbon Strategy (to create more and better jobs) by meeting the needs of employers in terms of lifelong learning and validation of non-formal and informal learning. Greater cooperation at the European level in the sphere of vocational education and training is necessary and this proposal strongly contributes to the lifelong learning agenda.
6. It is also appropriate for the consultation to promote a framework which is overarching and generic in nature ('meta' framework), and which will serve as an information tool.
7. However the UK HE sector has a number of questions and concerns regarding the EQF, which falls into two areas. First, we have some doubts about its compatibility with the (Bologna) Overarching Framework for Qualifications in the EHEA. A lack of clarity and potential overlap could undermine the effectiveness of the EQF LLL. Second, we have some concerns about the potential functionality of the EQF. (Please see paragraph 9)
8. UK HE stakeholders strongly believe that as the meta framework is designed to incorporate a significant number of countries, large amounts of detail is not required. This will minimise the risk of differing local interpretation. The Bologna HE framework provides the broad essential information for the top three levels and should not be compromised or amended. Furthermore the Bologna framework, being broad in design, was established in a European sector which is largely binary and thus designed to meet the needs of both HE and VET.
9. The UK HE sector has developed much experience and good practice in this area, for example with the Scottish education sector having developed the integrated LLL Scottish Credit and Qualifications Framework³ and Welsh stakeholders the Credit and Qualifications Framework for Wales⁴. (The situation in England, with regard to credit, is currently the subject of a separate consultation.) It is critical that expertise and developments are taken into account in order to learn from good practice and help ensure better understanding and acceptance. This is also essential to avoid overlap and confusion between different qualification frameworks in existence. Indeed, this is an issue, which the Bologna Follow-Up Group working-group on Qualifications Frameworks will be concentrating on.

³ <http://www.scqf.org.uk/>

⁴ <http://www.elwa.org.uk/ElwaWeb/elwa.aspx?pageid=1612>

Compatibility with the (Bologna) Overarching Framework for Qualifications in the EHEA

- If the EQF is to be successful, it is essential it complements the existing Framework for Qualifications of the EHEA. Institutions may be placed in a confusing situation, if a scenario arises where they are invited to place qualifications in the context of both the Bologna and EU Qualification Frameworks which are different in nature. If this were to occur, it would be difficult for HEIs to be able to make full use of the EQF. It is not clear from the consultation paper how the two overarching frameworks will co-exist and operate in practice. It is essential, therefore, that institutions are able to align qualifications to the Bologna HE Qualifications Framework, through national frameworks, rather than directly to the EQF. The Bologna Framework would in turn articulate with the EQF. Clarity is required to avoid confusion over the various frameworks' purposes. Indeed the European Commission supported the work of the BFUG 'Qualifications Working-group' on ensuring compatibility between the two overarching frameworks.
- UK HE stakeholders urge, therefore, that emerging differences should be closely monitored and addressed, for example in terms of descriptors, methodological approaches underpinning the frameworks (the use and application of levels, level indicators, learning outcomes, external reference points) and the role and understanding of credits.
- It is essential that the use of 'learning outcomes' is fully embedded in the EQF. Table 2 in the consultation paper - which provides supporting and explanatory information for each level of the EQF- includes information about aspects of qualification systems which are not directly related to learning outcomes, but rather based on input indicators. In contrast, the Bologna Process has resulted in a positive move away from in-put approach. There must be a common approach to learning outcomes between the Bologna HE Framework and that used by the EQF or there may be disjunction with the EQF between HE and VET, potentially leaving HE isolated. UK HE would therefore call for 'Table 2' to be removed.
- Information is required on the process by which each country will certify compatibility of its own qualifications framework with an EQF (page 33). Details of 'self-certification' with the Bologna HE Framework are set out in the report to Ministers, meeting in Bergen. However, with regard to the EQF, there is the potential for a duplication of work (two processes of self-certification) and ambiguities owing to different components of the two European qualification frameworks.
- It is also not clear from the consultation paper how the EQF will apply to the 20 signatory countries of the Bologna Process which are not members of the EU.

Long-term success and functionality of the EQF

- The EQF has the potential to provide a common reference point or language to enable existing sectoral, national and European qualification frameworks to communicate and articulate with one another. Meta frameworks primarily act as an external reference point, while national and regional framework provide the detail. While it is important that the EQF meets the needs of a diverse range of stakeholders, for the Framework to be used by education providers and learners alike, it is essential that European level proposals in this area should remain simple and overarching in nature. UK HE is concerned that the level descriptors learning outcomes (table 1, pages 18 – 20) defined in terms of knowledge⁵, skills and personal and professional competence, are over-detailed. The amount of detail in the level descriptors could undermine the very purpose of the EQF for LLL which needs to be broad enough to cover schools, VET, HE, FE, informal learning etc. The more systems/frameworks to be included in an over-arching framework the more generic and less detailed it needs to be.
- This over-prescription could hinder member-states - currently without national qualification frameworks - in the development of their own frameworks in the context of national education development and heritage.
- The UK HE sector is concerned that this level of detail could result in some eventual form of regulation. Similarly we would not wish to see a European call for all member-states to put in place a single national framework of qualifications.
- The UK HE sector believes that the proposal for the Framework to include overly-detailed information on competences and 'units of learning', may impinge negatively on HE provision where the qualification as a whole is seen as the primary learning block. The compartmentalisation of learning outcomes into knowledge, skills and competences may contradict the essential integration between these components. It is important that HE qualifications are able to retain their coherent and integral nature, where the whole is greater than the sum of the parts.
- In order for the EQF to work, the 'tools'⁶ (page 29) identified need to be in place, commonly understood and applied. There is therefore a need to raise greater awareness of the 'Europass' tool across Europe. And with regard to ECTS, UK HE has concerns that, as an accumulation framework, it is underdeveloped and ill-defined. It is also essential that the 'tools' of the EQF do not encroach on what is properly a matter for local

⁵ Furthermore we would argue that 'knowledge' should be regarded in its broader sense of 'understanding'.

⁶ ECTS, Europass and the Ploteus database on learning opportunities

(national or regional) frameworks and these jurisdiction issues must be made clear in the proposal.

- It is of cardinal importance that clear institutional autonomy for admissions and awards is maintained but it is unclear how this will relate to the proposals for the use of credit accumulation and transfer (page 29).
- UK HE stakeholders also have some concerns regarding the proposal's emphasis on sectoral frameworks. While it is important in a lifelong learning environment to involve the wide-range of education providers, we would not want to see national frameworks by-passed as a result of employers seeking qualifications' primary alignment with the meta-Framework as opposed to the national framework.
- Questions relating to the voluntary nature of the EQF also exist. For example, it is not clear how closely the EQF will sit alongside the EU Directive on the recognition of professional qualifications, which is a legal EU instrument binding on member states in terms of the recognition of qualifications in the field of regulated professions. Thus in this respect we would not wish to see the 'voluntary' EQF tied too closely to the legal EU Directive.