

Consultation
on the
European Commission Proposal
for a
European Qualifications Framework for Lifelong
Learning

Response from Ireland

National Qualifications Authority of Ireland
December 2005

Index

	Page
Introduction	3
Consultation in Ireland	4
Summary of points made and issues raised in the Irish consultation	6
Irish response to the proposal for a European Qualifications Framework for Lifelong Learning	8
Appendices:	16
1. List of organisations represented on the Consultative Group of the National Qualifications Authority of Ireland	
2. List of organisations invited to respond to the European Commission proposal for a European Qualifications Framework for Lifelong Learning	
3. List of organisations that made formal submissions on the EQF proposal to the National Qualifications Authority of Ireland	
4. Explanatory note on the European Commission Proposal Document	

Introduction

On 13 July 2005, the European Commission published a proposal for a European Qualifications Framework for Lifelong Learning ('EQF'), requesting Member States and other interested parties to consult widely about the proposal over a six month period and respond to questions raised about the conceptual model set out therein. In Ireland, the Department of Education and Science and the Department of Enterprise, Trade and Employment requested the National Qualifications Authority of Ireland to undertake a consultation process on the Commission proposal and to assist in the preparation of a national response.

This paper is the formal response from the relevant authorities in Ireland to the Commission proposal, which has been prepared by the National Qualifications Authority of Ireland and approved by the Department of Education and Science and the Department of Enterprise, Trade and Employment.

Consultation in Ireland

Commissioner Jan Figel launched the Commission's consultation on the European Qualifications Framework for Lifelong Learning (EQF) at the informal meeting of European education ministers in London on 12 July 2005.

The consultation seeks comment on the proposals set out in a working document. The consultation document is specifically aimed at experts, stakeholders and policy-makers in the field of qualifications and qualifications systems rather than at general actors in education and training or the general public.

The 32 countries, including Ireland, participating in the Education and Training 2010 work programme were requested to organise their own national consultations. In these national consultations, the Commission requested that relevant ministries with a direct interest in lifelong learning – education, youth, employment, economic – be invited to participate and that they in turn consult all sectors of employment and education most directly concerned by the development and implementation of the European Qualifications Framework. The Commission set out that this should include

- secondary education
- higher education, including academics in the field of education
- vocational education
- adult and community education
- trades unions and employers
- national sector associations, e.g. industries such as ICT and construction
- NGOs and voluntary organisations, e.g. in youth work

Comment was sought on any aspect of the proposal. However, a set of specific questions was set out by the Commission to focus the consultation on the key issues surrounding the European Qualifications Framework: in particular, whether the EQF reference levels and descriptors are appropriate and whether national and sectoral qualifications can be related to these reference levels and descriptors.

Responses to the Commission proposal were requested by the end of 2005.

In Ireland, the Department of Education and Science and the Department of Enterprise, Trade and Employment requested the National Qualifications Authority of Ireland to undertake the consultation process on the Commission proposal, and to present a report to the two Departments. The Qualifications Authority set in train a range of actions:

The proposal document of the Commission was placed on the Authority website when it was published in July.

The Authority hosted an initial meeting of stakeholders to discuss the proposal on 13 September 2005, using the structure of a general Consultative Group that has

assisted the Authority in its work over several years. The list of organisations represented on the Consultative Group is included at Appendix 1.

An Explanatory Note was prepared to assist Irish stakeholders in considering the proposal. This note, the Commission proposal document and a response form were placed on the Authority website and a wide range of organisations were invited by email to make submissions that would contribute to the development of a national response to the EQF proposal. The Explanatory Note is attached at Appendix 4. The list of organisations invited to participate is attached at Appendix 2; it reflects the sets of stakeholders suggested for consultation by the Commission. Several organisations made formal submissions to the Authority about the proposal and these are listed at Appendix 3. The submissions can be viewed at

<http://www.nqai.ie/en/International/EQFConsultation/EQFSubmissions/#d.en.1138>

A draft response to the proposal was brought to the Consultative Group of the Authority for consideration.

A report was made to the Department of Education and Science and the Department of Enterprise, Trade and Employment, with recommendations for a national response to the Commission proposal. This report has been approved by the two Departments.

Summary of points made and issues raised in the Irish consultation

In the course of the Irish consultation process, many views and perspectives were contributed on various aspects of the EQF proposal. Some of the questions asked in the proposal produced consistent comment: for example, asked 'How can a National Qualifications Framework for lifelong learning, reflecting the principles of the EQF, be developed in your country?', responses invariably pointed out that a National Framework of Qualifications already exists. On other questions there is less consensus. On some issues there is consistency of opinion in particular sectors (such as higher education). On a few issues there are conflicting or contradictory views. The range of consensus –v – conflict in views is similar to that encountered during the recent development phase of the National Framework of Qualifications in Ireland. The following are the most significant points made in the consultation, amalgamating feedback from formal submissions and from consultative meetings.

The most consistent message emanating from the Irish consultation is that stakeholders are generally very positive about the benefits of a European Qualifications Framework, even those who are opposed to certain specific aspects of the proposal now made. There is strong support for the key concepts of EQF as a meta framework, not replacing national relational structures, and a voluntary entity involving no legal obligations on participating countries.

The point is made by several respondents that The Framework for Qualifications of the European Higher Education Area (EHEA) has been developed with the involvement of key stakeholders in Higher Education, and has been adopted as policy at the Ministerial meeting in Bergen. It is strongly suggested that the EHEA framework and the EQF need to be carefully coordinated. Opinion varies as to whether the EQF parameters as proposed are sufficiently harmonised with the EHEA framework. On the other hand, other respondents are concerned that all levels of EQF should be available to all elements of education and training, and there is a fear that levels 6, 7 and 8 would become de facto exclusively higher education levels if the level descriptors are too closely aligned to the EHEA cycle descriptors.

There is general approval for the idea that a European Qualifications framework should be an overarching structure and not a replacement for a national framework. Nevertheless, it is clear from the responses to the consultation that many stakeholders, in addressing specific questions, find it difficult to perceive the difference in dimension between the 'national' framework and a 'meta' framework as proposed. There is, for example, a general preference that EQF should have the same number of levels as the Irish framework (ten). There is some concern that many countries approaching the development of national frameworks from now on will take the 8-level structure as a model, and that the Irish framework of ten levels could become anachronistic. The possibility of a

particular qualification having multiple titles and designations is identified as an issue (e.g. an award title, a national directory key number, a national framework level number, an EHEA cycle designation and an EQF level number). Several approaches to this issue are suggested: that EQF should be a structure of 'bands' rather than levels (i.e. the concept of 'levels' is allocated to the national dimension); that EQF levels be colour-coded rather than numbered; that EQF levels have titles or names or letter designations rather than numbers.

Many of those consulted are concerned about the inclusion of sectoral qualifications. The comment on this issue is complicated by confusion about the meaning of 'sectoral': some interpreted this in the way intended, as relating to qualifications associated with occupational sectors; others assumed the term to relate to a distinction between education and training as sectors, or between elements of the education system. A strong trend in the comments overall is a concern that the national framework should be the key relational entity between qualifications and that relationships thus established should not be 'second-guessed' or challenged by a sectoral arrangement with a meta-structure to which the national framework is aligned. A particular point emphasised in several responses is that national frameworks depend on strong arrangements for quality assurance in awarding bodies to guarantee consistency between different qualifications placed at the same level; there is concern that sectoral qualifications would be awarded by 'non-statutory' bodies and that quality assurance would be difficult to achieve. Generally, the recommendation is for sectoral and other professional qualifications to relate to EQF through the medium of a quality-assured national structure.

Some stakeholders from the business and employment sector put forward the view that what many employers are really seeking is a means of coordinating or aligning recognition associated with sectoral competence-development initiatives, and that EQF may not be of much direct practical use to businesses.

There is a welcome for the inclusion of all qualifications in EQF, including awards made at stages in the primary and secondary school process. However, there is a concern that the way these 'school awards' relate to EQF should be a matter for the relevant national authorities. The point is also made that arrangements for quality assurance that underpin the validity of school awards are typically embedded in the curricular and organisational structures of school systems, and these should not be affected by any conventions arrived at in EQF for quality assurance in the areas of higher education and training or vocational education and training.

Irish response to the proposal for a European Qualifications Framework for Lifelong Learning

In general, the idea of a meta-framework to establish relationships between national frameworks and systems of qualifications is strongly supported, and it is considered that the framework model outlined in the Commission proposal is appropriate and capable of implementation. Certain specific aspects of the proposal will require further development, notably the way the European Qualifications Framework for Lifelong Learning should interface with occupational sectors, and the way it relates to the Framework for Qualifications of the European Higher Education Area.

The key points in the Irish response can be summarised as

- there is a need to stress the voluntary basis of participation in EQF and that qualifications must relate in the first instance to structures in the national dimension and through the national structure to EQF;
- there is a need to ensure that the relationship between EQF and the Framework for Qualifications of the European Higher Education Area is clearly set out;
- there is a need for further development work on the interface between EQF and occupational sectors and the labour market before any EQF model is introduced.

1. Rationale for a European Qualifications Framework (EQF)

The objectives and functions set out in the proposal are considered to be appropriate as the basis of a qualifications framework for lifelong learning to operate as a meta-mechanism with voluntary participation of national authorities, without an international management structure.

The definitions set out for key concepts are generally appropriate. Together with the definitions in the annexed glossary they form the basis of a technical language which is necessary to enable meaningful discourse about qualifications frameworks to take place. Some additional definitions are needed to facilitate development of processes for establishing the relative sizes of qualifications at a level and for accumulation and transfer of recognition for learning outcomes in smaller, 'sub-qualification' packages: for example, 'volume', 'credit', 'accumulation', 'transfer'.

We consider that, for EQF to function in practical terms, it will be necessary to have clarity on the inter-relationship and placement of qualifications within each participating national system. Also, the logic of the EQF levels descriptors as proposed suggests that these relationships need to be defined on the basis of generic learning outcomes. On this basis, the rapid development of frameworks of qualifications or other relational structures at national level, as well as the

definition of qualifications in terms of learning outcomes, can be seen as prerequisites for the successful implementation of EQF.

If EQF is to operate on a voluntary basis, with some form of self-assessment as the basis of participation, strong and well-accepted arrangements for quality assurance are a vital element of the framework infrastructure. Transnational quality assurance initiatives are observed to be in development for higher education and training and for vocational education and training. It is recommended that arrangements for assuring the validity of qualifications associated with primary and secondary schooling should remain embedded in the appropriate national systems and structures.

For learners, the real benefits of EQF will be in terms of improved possibilities for access, transfer and progression, including international mobility, as well as opportunities for recognition of non formal learning and the validation of prior learning. The introduction of a meta-framework will not, in itself, guarantee these benefits. It will be necessary for the facility of the relational structure to be supported by the necessary resources to operationalise it at the national level. For example, it may be that in some cases there will be a need for new funding models to support more flexible and relevant learning opportunities for lifelong learners to enable them to achieve qualifications on a lifelong participation basis; there may also be a need for information and guidance systems to support this participation. Any document setting out an EQF model needs to mention the need for commitment at a national level by participating countries.

At the European level, the successful implementation of EQF can be seen to require deep and wide insertion of the EQF concept into all E.U. discussions and operations involving qualifications in any way, and particularly in all documentation where qualifications are referred to. This process of embedding EQF in the E.U. cultural and business matrix should begin with the Europass documents which should all require that qualifications be referred to with the appropriate EQF designations. Consideration should be given to the use of EQF levels in the collection of data and in statistical analysis.

The way EQF should relate to or be interpreted in the labour market is not properly explored in the proposal document (See sections 2 and 4 below).

2. The reference levels and descriptors

The proposed structure of eight levels is adequate as the core of a meta-framework designed to enable national frameworks and systems to relate in a meaningful way. It should not be promoted as a model structure for national systems, which may require a smaller or greater number of levels. As a corollary, it cannot be assumed that national frameworks levels will match EQF levels

neatly, and the relationship between the national and the meta would need to be worked out individually and on a pragmatic, best-fit basis.

The level descriptors are set out in well-modulated steps based on statements of the learning outcomes to be required for the award of qualifications at a level. It is considered that these will be adequate for purpose in their present form. If any further development in the descriptors is undertaken, it should be only on the basis of making these statements more generic and less detailed.

The use of the term 'level' in EQF may cause confusion in relation to the referencing of qualifications, as the same term is in use in national frameworks. It is of paramount importance to establish the distinction between national frameworks and EQF. On this basis, consideration should be given to the possible use of the term 'bands' for the elements of the European framework that define the relationship between national systems of qualifications, thus ensuring a clear distinction between these and the national 'levels' that define the relationships between qualifications.

EQF and the Framework for Qualifications of the European Higher Education Area

The Framework for Qualifications of the European Higher Education Area (EHEA, or 'Bologna' Framework) has been developed with the involvement of key stakeholders in higher education, and has been adopted as policy at the Ministerial meeting in Bergen. It is vital to ensure that EQF complements the existing EHEA Framework, that the relationship between these two frameworks be clearly expressed and that procedures be set out for how the two frameworks will operate together. It is considered that the level descriptors for EQF Levels 6, 7 and 8 are generally compatible with the descriptors for the cycles in the Bologna Framework; however, there is insufficient elaboration in the proposal document of the way the EQF levels and the 'Bologna' cycles should inter-relate in practice.

We suggest, accordingly, that in addition to the level descriptors, EQF should set out typical higher education cycle completion descriptors at levels 6, 7 and 8 and these should be the Dublin Descriptors. This arrangement would address concerns expressed widely among the higher education community about possible interference with understandings already reached and operationalised in the Framework for Qualifications of the European Higher Education Area.

Supporting and Indicative Information (Table 2)

The factors that characterise the levels in Table 2 cannot be taken into account in any way in defining the EQF levels themselves; neither can table 2 be used as a

basis for defining the relationship between any national system or structure and the EQF levels. However, Table 2 is useful as a supplementary general aid to individuals and organisations whose concept of the meaning of a qualification is based on programme specifications, or on learning models, or on occupational hierarchies, in developing an understanding of the meaning of levels based on learning outcomes. In its present form, Table 2 is adequate for this limited purpose.

Matching of national and sectoral qualifications

It is an accepted axiom that EQF should be a meta-framework, defining relationships between national frameworks or other qualifications-organising structures on the basis of a set of generic reference levels. Individual qualifications or sets of qualifications should be referenced to EQF through the national structure. The consultation paper stresses as a recommended procedure that each country should now develop a local framework or frameworks as a prelude to involvement in the EQF process.

On the matter of the matching of national qualifications to EQF levels and descriptors, the Irish approach is clear: national qualifications should in the first instance be matched to a national framework or other relational structure or system, and such a process should be within clear national criteria and be implemented on a transparent basis. The national structure should then be matched or aligned to EQF. The proposed model for EQF is not appropriate as a structure to which qualifications can be related independently, nor are the proposed 'self-certification' approaches adequate to support inclusion of qualifications without the trust-building guarantee of national or 'statutory' accreditation of awarding bodies and quality-assurance arrangements.

In the Irish situation, one comprehensive Framework accommodates all qualifications. The various awarding bodies have already developed tools and processes for referencing their existing awards to the levels in the National Framework and for designing standards for new awards. In order to reference an Irish qualification to EQF, it would now be necessary to establish the relationship between the National Framework of Qualifications and EQF.

The sections in the proposal document of the Commission that deal with the matter of sectoral qualifications are vague, and it is difficult to respond specifically to what is proposed. The Irish position on this issue is that, as with national qualifications, sectoral qualifications can not be related independently to a meta-framework. The preferred approach would be for sectoral qualifications to be placed in the first instance, through the structures of the national authorities, in national frameworks. This is vital to the success of the EQF in terms of promoting acceptance and mutual trust, which demand that the award of qualifications should be subject to quality assurance by external bodies or

agencies, and that those agencies should themselves be subject to regular review. As no international structure for decision making about placement of qualifications in EQF, or for external review of quality assurance systems, forms part of the EQF proposal, there will be a fundamental problem with placement of sectoral qualifications if they bypass national systems. It should be noted in this regard that a range of employment sectoral groups need to be considered:

- sectors that exist and operate in the national dimension, which may or may not be integral to the state education and training infrastructure
- international employment sectors, both governmental and non-governmental.

The issues arising for the matching to EQF of qualifications associated with these sectoral groups vary widely.

It is strongly recommended that further development work should be urgently undertaken on the broader issue of the interface between EQF and the occupational sectors and the labour market, including the possible approaches to the matching of sectoral qualifications to the meta-framework. This issue is further addressed in section 4 below.

3. National Qualifications Frameworks

Ireland has developed a national framework of qualifications which is compatible with the principles and processes set out for the EQF. Systems are evolving continuously as implementation progresses.

The definition of a qualification as a recognition of learning outcomes is a fundamental principle underpinning the National Framework of Qualifications. New awards based on this approach are now available throughout higher education and training, and preparations are well advanced for the imminent introduction of new outcomes-based awards in Further Education and Training (incorporating all vocational education and training).

4. Sectoral qualifications

As indicated above in section 2, the whole matter of the interface between EQF and the labour market requires significant further development. This development should be undertaken comprehensively: it is not advised that separate solutions be sought to specific issues already identified, such as ways of matching sectoral qualifications to the EQF levels.

The EQF model, of a meta-framework that relates national systems to one another, can provide a transnational environment in which to explore the issues of how employers use qualifications and how they would like to use qualifications. Indications from the Irish consultation suggest that some

employers may prefer to have a ‘framework of competences’ rather than a ‘framework of qualifications’. This could be realised in various ways other than direct matching of certain qualifications to EQF, for example by building on the approach of the competence framework developed for the Europass Language Passport to develop an additional support instrument for the EQF model that could enable the identification of levels of achievement of specific skills or competences in specific employment sectors.

A possible process for moving towards a better EQF / labour market interface would be to

- initiate research into how employers want to use qualifications, and
- establish a development group to coordinate the research and to bring forward a strategy incorporating the results of the research into the emerging EQF model.

This development group could be structured as a subgroup of the EQF development group augmented by sectoral experts. This approach proposes the enlisting of sectoral stakeholders as partners in the EQF development process in a focused and intensive way. It is suggested that this is more likely to result in support from the sectors for the implementation of EQF, rather than seeking to involve them as one of several ‘user groups’.

Sectoral stakeholders can best be linked to national qualifications in the context of their involvement in the development of a national framework of qualifications.

5. Mutual trust

The ideal is for the establishment of a robust EQF, which is used regularly by learners and employers across Europe, supporting cross border movement by European citizens. For that to occur, there first needs to be a process of establishing mutual trust in the standards and learning qualifications in the different countries. That will be facilitated by the development of common approaches to quality assurance.

It is unlikely therefore that the EQF itself will in the first instance contribute to development of mutual trust – rather the development of mutual trust will be essential for the successful operation of the EQF. Factors that can contribute to this process include the use of instruments such as the Europass CV and the Certificate and Diploma supplements across European countries. Provision should be made that these instruments would include reference to the relevant levels of the EQF.

As for how EQF might contribute to improving the quality of lifelong learning, the example of the National Framework of Qualifications in Ireland is apt. The Irish Framework provides a basis for transparency of learning outcomes, and for

comparing qualifications and awards. As the Framework develops, it will contribute to improved arrangements for access, transfer and progression to awards by learners. It facilitates the identification of appropriate progression routes and enables the development of credit systems and arrangements for the recognition of prior learning. In the European dimension, the EQF can be expected to have similar effects.

6. Other comment

Need for a quantifying mechanism

A full set of tools and instruments to enable learners to use qualifications systems in a lifelong learning context must certainly include a system or systems for credit accumulation and transfer.

It can be anticipated that the development of credit systems will take some time. In the meantime, the EQF context potentially ushers in another use for the credit concept, as a quantifying device to support the levels referent in the comparison of qualifications. For the levels to be used effectively to compare qualifications in different systems, it will be necessary to identify and adopt a convention on how to measure the relative sizes of qualifications at any particular level in EQF, in other words to quantify the learning outcomes required for a qualification. The need for this facility has already been recognised: it is seen in the identification of credit ranges for qualifications in the EHEA Framework. Efforts have been made to identify credit ranges for all levels in EQF during the drafting of the Commission's proposal document. It was not possible to identify credit ranges for EQF at this time. This is because the proposal was for the adoption of arbitrary ranges. EHEA ranges, on the other hand, are not arbitrary, being based on a quantifying convention adopted for the ECTS credit system. Credit ranges for EQF would need to be based on a quantifying convention for EQF as a whole. It is suggested that the adoption of such a 'credit convention' – an agreed basis for measurement of the volume of learning outcomes associated with a qualification – is a necessary first step in the process of establishing size or volume parameters for qualifications at EQF levels. The development of a 'credit convention' or other quantifying device should be seen as an urgent requirement to be fulfilled before an EQF model is finalised.

A 'credit convention' for EQF should be a very 'meta', very simple mechanism. It does not have to be a Credit Accumulation and Transfer (CAT) system: Its function would be to add to and enhance the EQF level descriptors by providing a simple and consistent means of quantifying the learning outcomes associated with a qualification. This function also enables the quantifying of bundles of learning outcomes smaller than a whole qualification, thus supporting the

development of processes for Credit Accumulation and Transfer in both national and transnational contexts.

The technical aspects of identifying a suitable convention are comparatively straightforward, and a short development period should suffice.

Appendices

1. List of organisations represented on the Consultative Group of the National Qualifications Authority of Ireland
2. List of organisations invited to respond to the European Commission proposal for a European Qualifications Framework for Lifelong Learning
3. List of organisations that made formal submissions on the EQF proposal to the National Qualifications Authority of Ireland
4. Explanatory note on the European Commission Proposal Document

Appendix 1.

List of organisations represented on the Consultative Group of the National Qualifications Authority of Ireland

Department of Employment, Trade and Enterprise
Department of Education and Science
State Examinations Commission
National Council for Curriculum and Assessment
Further Education and Training Awards Council
Higher Education and Training Awards Council
Higher Education Authority
Irish Universities Association
Irish Universities Quality Board
Council of Directors of Institutes of Technology
Dublin Institute of Technology
Irish Vocational Education Association
Community and voluntary sector representative
AONTAS (adult learning representative group)
Irish Congress of Trade Unions
Irish Business and Employers' Confederation
Union of Students in Ireland
FÁS (national training and employment agency)
Fáilte Ireland (tourism development and training board)
Teagasc (agricultural development and training board)

Appendix 2.

List of organisations invited to respond to the European Commission proposal for a European Qualifications Framework for Lifelong Learning

Adult Education Centre
American College Dublin
AONTAS
Area Development Management Limited
Association for Higher Education Access and Disabilities
Association of Secondary Teachers, Ireland
Athlone Institute of Technology
Burren College of Art
Carlow College
Chartered Institute of Management Accountants
City of Dublin Vocational Education Committee
Coláiste Mhuire, Marino Institute of Education
Comhairle
Construction Industry Federation
Cork Institute of Technology
Council of Directors of Institutes of Technology
Department of Education and Science
Department of Enterprise, Trade & Employment
Dublin Business School
Dublin City University
Dublin Institute of Technology
Dún Laoghaire Institute of Art, Design and Technology
Dundalk Institute of Technology
Economic and Social Research Institute
Enterprise Ireland
Equality Authority
Fáilte Ireland
FÁS
Forfás
Froebel College of Education
Further Education and Training Awards Council
Galway-Mayo Institute of Technology
Griffith College
Hibernia College
Higher Education and Training Awards Council
Higher Education Authority
Higher Education for Development Co-operation
HSI College
IDA Ireland
Institute of Public Administration
Institute of Technology Sligo
Institute of Technology Tallaght
Institute of Technology Tralee
Institute of Technology, Blanchardstown
Institute of Technology, Carlow
Institute of Technology, Limerick
Irish Business & Employers Confederation
Irish Congress of Trade Unions
Irish Federation of University Teachers
Irish Management Institute
Irish National Accreditation Board
Irish School of Ecumenics
Irish Universities Association
Irish Universities Quality Board
Irish Vocational Education Association
Letterkenny Institute of Technology
Library Council
Limerick Institute of Technology
Mary Immaculate College
Mater Dei Institute of Education
Milltown Institute of Theology and Philosophy
National Adult Literacy Agency
National Centre for Guidance in Education
National Centre for Partnership and Performance
National Centre for Technology in Education
National College of Art and Design
National College of Ireland
National Council for Curriculum & Assessment
National Council for Special Education
National Parents Council - Post Primary
National University of Ireland
National University of Ireland Galway
National University of Ireland, Maynooth
National Youth Council of Ireland
National Youth Federation
Portobello College
Royal College of Physicians of Ireland
Shannon College of Hotel Management
Skillnets
Special Needs Education Council
St Angelas College
St Catherines College of Education for Home Economics
St Patrick's College Drumcondra
Tallaght Partnership
Teachers Union of Ireland
Teagasc
Technical Engineering & Electrical Union
The Chambers of Commerce of Ireland
The Church of Ireland College of Education
The Institution of Engineers of Ireland
The International Education Board Ireland
The University of Dublin, Trinity College
Tipperary Institute
Training and Evaluation Services Ltd
Union of Students in Ireland
University College Cork
University College Dublin
University of Limerick
University of Ulster
Waterford Institute of Technology
Youthreach

Appendix 3.

List of organisations that made formal submissions on the EQF proposal to the National Qualifications Authority of Ireland

Department of Education and Science

Gender Equality Unit, Department of Justice, Equality and Law Reform

Teagasc

Forfás / Enterprise Ireland / IDA Ireland (Industrial Development Agency)

The Further Education and Training Awards Council

FÁS

Irish Vocational Education Association

City of Dublin Vocational Education Committee

Higher Education Authority

Irish Universities Association

National University of Ireland

University of Limerick

Dublin Institute of Technology

Union of Students in Ireland

Irish Congress of Trade Unions

Irish Business and Employers Confederation

Construction Industry Federation

Appendix 4.

Explanatory note on the European Commission Proposal Document

Contents

Part I - Introduction and Background

Part II - Consultation

Part III - Summary of Proposal

Part IV - Links to European Higher Education Developments

Part V - Irish Developments

Part I - Introduction and Background

Introduction

This explanatory note has been prepared to assist Irish stakeholders in considering the proposal of the European Commission for a European Qualifications Framework for lifelong learning, as set out in the European Commission Staff Working Paper SEC (2005) 957, published 12 July 2005

Background

The Irish authorities, principally the Department of Education and Science and the Department of Enterprise, Trade and Employment and the various agencies under their remit, have been encouraging the development of an overarching European framework which can enable national frameworks of qualifications to relate to each other and to be compared to each other for a number of years.

The Council of EU Education Ministers and the European Commission agreed a Joint Interim Report on 26 February 2004; 'Education and Training 2010' reviewed progress in implementing the working programme on the future objectives under the Lisbon process and set out a number of priority areas for future work. The report called for the establishment of a European framework to stand as a common reference for the recognition of qualifications. The Report further indicated that, given the diversity across Europe in structures and organisation, it is the learning outcomes and competences acquired through the programmes or training periods that should be regarded as important reference levels for the description of qualifications. The report also indicated that a framework of this kind for Europe should naturally be based on national frameworks, which themselves must be coherent and cover higher education and vocational education and training.

The National Qualifications Authority of Ireland hosted a major conference as part of the Irish Presidency of the European Union on 8th March 2004 on common themes in

European policy development in higher education and in vocational education and training. The conference recommended that a European Qualifications Framework be taken forward within the framework of the Education and Training 2010 work programme, with a view to linking together the common reference levels framework for vocational education and training and the Qualifications Framework developed for the European higher education area (Bologna process).

Early in 2005, the European Commission established an expert group to assist it in preparing a proposal for consultation. Members of the executive of the Qualifications Authority (Seán Ó Foghlú and Edwin Mernagh) have worked with the Commission as part of that expert group.

Part II - Consultation

Commissioner Jan Figel launched the Commission's consultation on the European Qualifications Framework (EQF) at the informal meeting of European education ministers in London on 12 July 2005.

In launching the consultation Commissioner Figel indicated that comment was being sought on the proposals in the working document. He further set out that the consultation document is specifically aimed at experts, stakeholders and policy-makers in the field of qualifications and qualifications systems rather than at general actors in education and training or the general public.

The 32 countries, including Ireland, participating in the Education and Training 2010 (i.e., the Lisbon) work programme are being requested to organise their own national consultations. In these national consultations, the Commission has requested that all relevant ministries with a direct interest in lifelong learning - education, youth, employment, economic - be invited to participate and that they in turn consult all sectors of employment and education most directly concerned by the development and implementation of the European Qualifications Framework. The Commission has set out that this should include, for example, the following:

- secondary education
- higher education, including academics in the field of education
- vocational education
- adult and community education
- trades unions and employers
- national sector associations e. g. industries such as ICT and construction
- NGOs and voluntary organisations e.g. in youth work

Comment on any aspect of the proposed EQF is welcomed by the Commission and, in particular, to the specific questions set out by the Commission which seek to address the key issues surrounding the EQF, in particular, whether the EQF reference levels and descriptors are appropriate and whether your national and sectoral qualifications can be related to these reference levels and descriptors.

In addition to these national consultations, the Commission is consulting, at the European level, the Bologna follow-up Group, the other European Institutions (e.g. Parliamentary committees), the European social partners, the relevant European associations, NGOs and networks, and the European industry sector associations e.g. ICT, construction, marketing etc. The Commission is asking the European bodies to consult their national members.

The Commission's web link for the consultative process is:

http://europa.eu.int/comm/education/policies/2010/consultations_en.html.

The development of an EQF is also being discussed at the UK Presidency conference on qualifications frameworks in Glasgow on 22-23 September 2005. The website for this conference is:

<http://www.eventsforce.net/expotel/frontend/frontEndFrameset1.csp?eventID=10>

The Commission has asked that submissions be made by the end of 2005 and these are to be published on the Commission's website.

The Commission aims to analyse and summarise all responses from the consultation process and publish its own analysis of these. Initial planning is underway for a conference to publicise and discuss the results of the consultation in spring 2006.

Following the consultation, the Commission plans to make a formal proposal on an EQF for presentation as a Council/Parliament recommendation in the first half of 2006. It is likely that there would then be further consultation on this with a possible date for adoption some time in 2007.

Commission Questions

The Commission has identified the following questions as being of particular importance for this consultation process:

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 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?

National Qualifications Frameworks

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

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?

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?

Part III - Summary of Proposal

The main elements of the proposal are as follows:

- Purposes and functions
- Core elements
- Multiple stakeholders and users
- 8 levels referring to learning outcomes
- EQF as a framework for co-operation
- Relevance and credibility

Purposes and functions

An EQF would be developed and implemented on a voluntary basis, not entailing any legal obligations. It is envisaged as a meta-framework increasing transparency and supporting mutual trust. It would thereby enable qualifications frameworks and systems at national and sectoral level to be related to each other - thus facilitating the transfer and recognition of the qualifications of individual citizens.

Core elements

An EQF would consist of three main elements:

- The core would be a set of common reference points - referring to learning outcomes-located in a structure of 8 levels.
- These reference levels would be supported by a range of tools and instruments addressing the need of individual citizens (an integrated European credit transfer

and accumulation system for lifelong learning, the Europass instrument, the Ploteus database on learning opportunities).

- An EQF would also include a set of common principles and procedures providing guidelines for co-operation between stakeholders at different levels - in particular focussing on quality assurance, validation, guidance and key competences.

Multiple stakeholders and users

The three main elements of a possible EQF address different groups of stakeholders. The common reference levels have been designed and written to support the work of policy makers and experts at national and sectoral levels and provide ‘a reading grid’ facilitating comparisons and cooperation between national and sectoral frameworks and systems. The same applies to principles and procedures supporting co-operation and policy co-ordination. However, common instruments and tools play a different role by directly promoting individual mobility in learning and at work. The relevance of an EQF to individual citizens will be further strengthened when national and sectoral qualifications are systematically referenced to the EQF.

8 levels referring to learning outcomes

Qualifications at each level in a possible EQF are described (in table 1 and annex 1) in terms of three types of learning outcomes:

- knowledge
- skills
- wider competences described as personal and professional outcomes.

Each level of the EQF is described (table 1) in terms of typical learning outcomes that can be related to qualifications and qualification frameworks throughout Europe. However, the learning outcomes do not include details of specific qualifications as these are national or sectoral responsibilities. By approaching the design of the EQF in this way, each national or sectoral qualification or level can be matched by national and sectoral experts and competent bodies to a particular level in the EQF. Supplementary indicative information is provided (table 2) to explain the way EQF-levels would relate to existing, formal education and training systems and frameworks. This general information should be useful in the consultation process. At a later stage-when reaching the stage of implementation-table 2 should be filled in and further developed by national and sectoral authorities and bodies.

EQF as a framework for co-operation

The proposal outlines the relationship between the EQF and qualifications frameworks and systems at the national and sectoral levels. As the EQF would be voluntary and will not entail any legal obligations, the success of the initiative depends on the level

of commitment to the framework from different stakeholders operating at different levels.

National authorities must determine how the qualifications within each country are linked to an EQF. From the point of view of an EQF, the optimal approach would be that each country set up a single National Framework of Qualifications and link this single National Framework to the EQF. Considering the rich diversity of national education and training systems and their stages of development, each country should therefore put in place a process whereby existing qualification structures and systems (whether a single national framework or system of qualifications, or various systems of qualifications) are linked to the EQF.

An EQF would also provide a common reference point to guide and inform developments of education, training and learning at sector level. Where possible, these sectoral developments should be linked to national frameworks - thus facilitating transfer and compatibility. The EQF common reference would also make it possible to link sector initiatives to national qualifications and thus facilitate transfer and compatibility. Linking a sectoral framework to the EQF furthermore implies an acceptance of, and a commitment to, a set of criteria regarding quality and transparency. The decision on linking sectoral initiatives to the possible EQF should be made by the stakeholders themselves, in consultation with representatives of national authorities responsible for qualifications.

Relevance and credibility

The success of a European Qualifications Framework depends on its relevance and credibility for education and training institutions, employers and policy-makers and ultimately for individual learners. In particular, the stakeholders must be convinced that a European meta-framework is needed and can contribute-indirectly and directly-to lifelong learning.

Part IV - Links to European Higher Education Developments

European Higher Education Minister met in Bergen in May 2005 and adopted the Framework for Qualifications of the European Higher Education Area.

The Commission has set out that the development of an EQF is of direct relevance to the Framework for Qualifications of the European Higher Education Area adopted by the Bergen Ministerial conference. While the scope of an EQF would be broader than that of the framework for higher education, compatibility would be ensured between these two initiatives with the objective of one overarching European qualification framework addressing lifelong learning.

The ‘Dublin descriptors’, adopted within the Bologna process for coordination of higher education, have been used extensively to reflect the 4 highest levels of an EQF. The Commission has set out that where the Dublin descriptors have been amended for the EQF descriptors, this has been done to (i) achieve consistency with lower-level descriptors, (ii) to ensure that the learning outcome focus of an EQF is maintained and

(iii) to include high-level VET learning outcomes. Annex 3 to the Commission proposal presents the overlap between the Dublin descriptors and the descriptors of the EQF.

Part V - Irish Developments

General Issues

The general approach in the EQF has many parallels with the Irish approach.

Ireland is one of very few European countries that has introduced a national framework of qualifications. Thus many of the issues that other countries will now be considering, such as whether all qualifications can be in a single national framework and thus related to a European one and whether it is possible for higher education and vocational education and training qualification to be at the same level or both defined in terms of learning outcomes, have been addressed in Ireland.

Consultative approaches were put in place by the Qualifications Authority for the development of the National Framework of Qualifications and these can now be used in consultation on the Commission proposal.

Technical Issues

The EQF levels are defined in terms of three types of learning outcomes:

- knowledge
- skills
- wider competences described as personal and professional outcomes:
 - autonomy and responsibility
 - learning competence
 - communication and social competence
 - professional and vocational competence.

These parallel in many ways the Irish strands and sub-strands which are:

- knowledge: breadth and kind
- know-how and skill: range and selectivity
- competence: context, role, learning to learn and insight

There are some differences in the approaches:

- the outcomes captured under the heading of ‘Professional and vocational competence’ in EQF are similar to those categorised as a ‘selectivity’ sub-strand of Skills in the Irish Framework. The Irish statement for ‘selectivity’ also contributes to the correspondence between the two Irish Skills sub-strands and the Skills statement in EQF.
- the EQF levels include a statement defining outcomes in the area of communication, under the heading of ‘Communication and social competence’. The Irish level indicators make no specific reference to communication.
- there are also concepts in some of the EQF descriptors that are not made explicit in the Irish indicator statements, e.g., at EQF level 4 the need to ‘take account of ethical and social issues’, and the supervision and training of others.

The correspondence between the definitions of learning outcomes in the EQF proposal and in the Irish framework can be illustrated in the following table:

EQF	NFQ (Irl)
Knowledge	Knowledge: <i>breadth</i> Knowledge: <i>kind</i>
Skills	Know-how and skill: <i>range</i> Know-how and skill: <i>selectivity</i>
Personal and professional competence: (i) <i>Autonomy & responsibility</i>	Competence : <i>context</i> Competence : <i>role</i>
Personal and professional competence: (ii) <i>Learning competence</i>	Competence: <i>learning to learn</i>
Personal and professional competence: (iii) <i>Communication and social competence</i>	Competence: <i>insight</i>
Personal and professional competence: (iv) <i>Professional and vocational competence</i>	Know-how and skill: <i>selectivity</i>

A tentative referencing of the Irish Framework levels to the EQF levels:

NFQ (Irl)	EQF
1&2	1
3	2
4	3
5	4
6	5
7&8	6
9	7

10	8
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Irish Consultative Process on EQF

The Department of Education and Science and the Department of Enterprise, Trade and Employment have requested the National Qualifications Authority of Ireland to undertake the consultation process in Ireland on the Commission proposal with a view to presentation to the Department of Education and Science and the Department of Enterprise, Trade and Employment of a joint draft report for the Commission.

The Qualifications Authority published the proposal on its website when it was issued in July.

The Qualifications Authority has hosted an initial meeting of stakeholders to discuss the issue on 13 September 2005. Following this, the Authority is inviting written submissions by the end of October with a view to the drafting by the Authority of a draft Irish response to the proposal and an opportunity for consultation by the Authority with stakeholders on this draft response.

The aim is for the submission of a draft response to the two Departments by mid-December 2005.