

Response from The University of Leeds
to the Commission of the European Communities
Commission Staff Working Document

Towards a European Qualifications Framework for Lifelong Learning

Thank you for the invitation to comment on the proposals for a European meta-framework for qualifications spanning Lifelong Learning. As a University equally committed to education (academic and professional), research and the development of approaches to Lifelong Learning, we have reflected at length on the proposals. We have come to two principal conclusions:

- The proposals as they stand do not reflect, but confuse the outcomes we expect to be achieved in Higher Education qualifications. This is to the extent that they are not a useful and workable substitute for the (Bologna) *Framework for Qualifications of The European Higher Education Area* (EHEQF).
- Any proposals to develop a European credit accumulation and transfer system for Lifelong Learning must, at the present time, be limited to the type of 'indicative' or 'typical' credit ranges employed in the EHEQF.

We appreciate that much work has been devoted to the development of the current proposals. They are based on an approach which specifies learning outcomes in some detail. The present tabulations have the capacity to be used as free-standing instruments, and may well become widely interpreted as a checklist of all the outcomes that must be met for any qualification to be assigned a level. Whilst this approach may, with refinement, provide a useful national reference point for professional qualifications, it does not cover all disciplines that may be found in higher education.

The emphasis in your framework, in general, appears to be towards vocational/professional outcomes. The attempt to combine both professional and academic outcomes has muddled two equally important and distinct purposes/approaches - which we know, from our own long experience in providing many forms of professional education and training, can coexist. We, however, fear that any attempt, at the present time, to combine these two different approaches will, given the relative infancy of the learning outcomes approach and difficulties of interpretation across Europe, inevitably lead to one of the approaches becoming subservient to the other.

The EHEQF, with its 3 cycles and focus on overall qualifications, has been constructed to be as widely applicable as possible to all academic disciplines. It is also constructed to require flexible interpretation, that is, a 'best fit' approach is facilitated in any attempts to align qualifications obtained in the highly complex and widely different educational systems evident across the European member states. Any meta-framework needs to be able to do this now, whilst supporting (and not unduly constraining) continuing discussions, at the individual discipline level, which will enable common understandings to be reached about the value, and limitations, of the learning outcome approach. Any meta-framework also needs to be able to accommodate any qualifications and educational structures, which it might be found necessary to develop in the future to meet, as yet unidentified, national, local, disciplinary, professional or societal needs.

We find, particularly in respect of the EQF's higher levels (5, 6, 7 and 8), that the proposed learning outcomes do not sufficiently distinguish between the different qualifications in the Bologna cycles associated with those levels - with overlapping use of terminology between different levels, and the use of terms we would associate with a given level in an either higher or lower level (e.g. we associate 'mastery' with

level 7 rather than level 6). Whilst we accept that 8 levels may be appropriate professionally/vocationally at a national or sectoral level, we remain to be convinced that a highly detailed and complex European Framework with 8 levels is, at this time, the most practical and effective means of enabling and taking forward the alignment of different professional and academic qualifications and frameworks.

We note that the 'Dublin Descriptors' have been 'used extensively to reflect the highest levels of an EQF'. We are however concerned that they have been amended in a manner which removes many of the subtleties and nuances which enabled acceptance of their content as part of the Bologna EHEQF by Universities and other HEI. These subtleties ensured the widespread applicability of the outcomes to the many academic and professional disciplines and forms of education, research and training which take place in universities. The EQF's learning outcomes also appear, in general, 'over-ambitious' and we suggest that a 'threshold' approach needs to be adopted to ensure as wide an application as possible. For example: in some academic disciplines it is inappropriate to expect at the doctoral level the demonstration of 'substantial leadership ...in work and study contexts'. Academic leadership is a much more complicated concept than this. Furthermore many academic disciplines do not, by their very nature, provide any opportunities for the demonstration of 'strategic decision making based on [the processes of critical analysis, evaluation and synthesis of new and complex ideas]'. We wish to associate our University with the response already sent to you by NUCCAT which mentions similar concerns from a different perspective..

We suggest that the mutually supportive co-existence of a European Meta-Qualifications Framework for Lifelong Learning and the Bologna EHEQF (and, indeed, improved understanding of the 'typicality' of the outcomes and the equivalence in status of the ECVET outcomes and EHEQF descriptors) would be considerably aided by a form of presentation which sets out the ECVET and EHEQF in full, as equally valid alternative approaches. In this respect we suggest it would be helpful to discontinue use of the 'Dublin Descriptors' terminology as, apart from the 'short cycle descriptors' developed post Bergen, they represent a developmental stage which has been overtaken by the adoption of the EHEQF: continued reference to them will only serve to confuse anyone unfamiliar with recent developments.

Our belief that any European Meta-Framework must be very simple indeed, if it is to be effective practically, extends to any proposals for the development of an 'integrated European Credit Transfer and Accumulation System' as one of the tools to support the meta-framework. We note from - for example - the work undertaken under the 'Tuning Project', that the issues associated with the acceptability (recognition) of learning - achieved under one system - within a different system are highly complex, and require much more fundamental and detailed consideration of the learning achieved than that provided by notions of 'credit accumulation and transfer'.

In stating the aims and advantages of the EQF, we would ask you to take much greater account of the view that 'By itself, the adoption of a common credit system will do nothing much to increase the likelihood of student transfer' (source: paragraph 9, Higher Education Policy Institute Report on *Credit Accumulation and Transfer, and the Bologna Process: an Overview*, October 2004). This is an important alternative view meriting serious consideration. We ourselves wish to promote student mobility but are well aware that this requires many more actions than simply adopting a credit system.

We would commend to you the approach adopted under the EHEQF which simply states the typical range of credits to be associated with each of the Bologna cycles. In England, where adherence to agreed credit practices is voluntary, in much the

same way that is proposed for the adoption of your EQF, it has taken many decades of work, by like-minded institutions and individuals, for national credit arrangements to be evolved which are likely to be regarded as generally acceptable.

We would also press the Commission to ensure that provision covered by the Directive(s) on Professional Qualifications is NOT excluded from the proposed meta-framework for Lifelong Learning. In this context we recall in particular the invaluable insights to the development and understanding of learning outcomes made by the registrable professions in England (i.e. the dentists, doctors, midwives, nurses, physiotherapists, radiographers etc) through their experience of the provision of learning opportunities in clinical settings (which are relatively informal learning environments).