

## Response to DG EAC

# Consultation on a European Qualifications Framework for Lifelong Learning [SEC(2005)957]

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I very much welcome the opportunity to respond to DG's questions. In the light of the importance of higher education in the Lisbon Agenda, as well as the increasing momentum of the Bologna Process, the consultation is timely.

I am the representative of London Metropolitan University in Brussels, a senior adviser to the European University Association, and one of the UK team of Bologna Promoters. My response is individual, not institutional.

### *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?

Yes; the emphases placed on quality assurance, validation of non-formal and informal learning, and mobility instruments, are particularly welcome. I fully support a framework which increases upwards and lateral mobility and which eases access and re-access to higher education.

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

While I understand that EU legislation on the recognition of professional qualifications is not the remit of DG EAC, it should not be left on one side.

Historically, it is the first of the three QFs – with Bologna and the proposed EQF – and is the only one to have legal force at EU level. It should be fully integrated and become the basis on which the European Neighbourhood Instrument is used to draw non-EU, non-EEA and non-candidate Bologna signatory countries into the internal market.

The Qualifications Directive covers sectoral professions and sets out agreed lists of basic competences. Yet these competences were identified thirty years ago and there has been dramatic professional and technological development in the intervening period. In some instances (witness the presence of nursing in the Tuning Project, for example) attempts are being made, by professionals and academics, to use the Dublin Descriptors in a manner consistent with the EQF proposal. The outcomes of this work should be used to update the Qualifications Directive and to align it with EQF and Bologna. The matter will become pressing when generalised use of the Diploma Supplement brings into the open some of the disparities which mutual trust has obscured.

The Directive's general system has five levels; these, too, should eventually be brought into line with EQF – in the interests of transparency and mobility.

The Qualifications Directive, moreover, shares with the draft Services Directive a dependence on the distinction between temporary and established service delivery. As the internal market in services moves towards completion (the target date is 2010, just as it is for the European Higher Education Area and the European Research Area), cross-border service delivery will increase in volume. So too will public awareness of professional and academic qualifications and their pan-European currency. A fully integrated QF is essential if confusion is to be avoided.

### *The reference levels and descriptors*

- Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?

Yes; but it will need to be reviewed by ex-post impact assessment and in the light of the evolution of the Bologna Process. DG MARKT comitology and the common platforms set up by the Qualifications Directive should participate in this process, as should all other stakeholders.

- Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?

In my view, yes.

- What should be the content and role of the 'supporting and indicative information' on

education, training and learning structures and input (table 2)?

It should be used, where appropriate, to back up the information on the national QFs provided by the national EUROPASS agencies. Its drawback is that it promotes as norm a linear academic development punctuated by points of cross-over to the labour market. Patterns of lifelong learning are likely to be much more differentiated than this; the table could usefully contain illustrations of the career flexibility which the EQF is intended to facilitate.

- How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?

In England this work is in train; UK government fully supports the process.

#### *National Qualifications Frameworks*

- How can a National Qualification Framework for lifelong learning be developed in your country – reflecting the principles of the EQF-be established?

In England there is no national credit accumulation and transfer system; sectoral qualification systems have evolved since the nineteenth century and are extremely complex. Nevertheless, as indicated above, government 'is working with other Member States to develop a European credit transfer system, to improve the transparency and recognition of learning outcomes from vocational education and training.' [*Putting the world into world-class education*, DfES, 2004, para.26]

- How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?

In England, thanks to the combined efforts of HEIs and the Quality Assurance Agency, the culture is already in place.

#### *Sectoral qualifications*

- To which extent can the EQF become a catalyst for developments at sector level?

In my view the EQF will facilitate, but more powerful catalysts are the completion of the internal market in services, the financial services action plan and the attempts by DG Competition to break down protectionism in the liberal professions. These will make the concept of an integrated European labour market much more meaningful; at that point, the EQF will play an important role as a support to mobility and the four freedoms.

- How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?

It is one of a number of evolutionary processes running in parallel; in order for them to converge, stakeholders and policy-makers cannot afford to lose sight of developments in other policy fields. The EQF's adequacy for purpose will need to be regularly monitored.

- How can stakeholders at sector level be involved in supporting the implementation of the EQF?

They can be involved in a number of ways: in comitology (DG EAC and DG MARKT), in actions such as the Tuning Project and the Thematic Networks, in complementary measures inscribed within the new integrated programme in lifelong learning, as well as by the initiative of sectoral bodies, Bologna Follow-up Group, national and regional authorities, social partners and EU institutions. Ideally, EQF implies a model of co-regulation which is enabling rather than prescriptive, but which is backed up by legislation at all levels where appropriate. The overriding principle should be that the EQF should be implemented in a manner determined as close to the end-user (the mobile citizen) as possible.

- How can the link between sectors development and national qualifications be improved?

It is the responsibility of national and regional authorities to secure this, assisted by the EU institutions.

### *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?

Mutual trust can be based on opacity, but it tends then to be a conservative force and to inhibit innovation. The EQF will bring a much-needed transparency. This, in turn, will allow a wider range of stakeholders to participate and to customise the system at different levels without undermining its structural principles.

- How can the EQF become a reference to improve the quality of all levels of lifelong learning?

In the first instance, by ensuring that the EUROPASS mobility instruments take the EQF as their frame of reference; and by requiring applicants for the ERASMUS Charter to make full use of them. Secondly, it can update the Qualifications Directive and align it with EQF.

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