

UNIVERSITY OF LUTON

Consultation on 'Towards a European Qualifications Framework for Lifelong Learning'

The University is delighted to be able to contribute to the discussions about the establishment of an EQF. As an institution it is committed to lifelong learning and encouraging student mobility. It has articulation arrangements with a growing range of EU institutions and recruits students from across Europe. The development of a common qualifications framework would assist the University in its work by enhancing flexibility of provision and student mobility.

The rationale of the EQF

The University endorses the objectives to be fulfilled by an EQF as set out in section 4 of the consultation document. In its opinion, a system which enables students, employees and employers to clearly and easily locate qualifications within a Europe-wide system should be the over-arching aim.

To make this work the system needs to be simple and written in a language which is easily intelligible to those who are not directly involved in education. Furthermore, once established, there is a need to develop readily accessible guidance material on how the qualifications in the various countries and within the framework, articulate with each other. The University is used to a system which identifies qualifications in credit terms by two variables; level and volume. The proposed EQF will assist with the former but qualifications themselves will also need to be characterised by credit volume. With the increase of work-based learning this is becoming increasingly problematic.

The reference levels and descriptors

The University broadly supports the 8-level reference structure and welcomes the attention paid to 'Learning competence' within the framework. It believes that its qualifications can be located within this overarching structure although further work will be required to establish whether academic, vocational and professional programmes can all be adequately described within the framework. Initial discussions within the University have identified some potential issues and, in particular, the need to take on board the views of professional bodies will be important when agreeing the final framework. Some terminology will need to be further defined (such as what constitutes 'mastery' and 'creativity') and how this relates to UK qualifications within the first cycle of qualifications under Bologna. Not all qualifications at each level will demonstrate all of the competences within the framework (for example, not all level 6 qualifications will include 'the training of others to develop team performance'). The role of the EQF as a framework document rather than as a standard could be further articulated in any revised proposals.

National Qualifications Frameworks

The University suggests that work in this area needs to be taken forward by UUK (and other interested bodies) on behalf of the sector and involving input from the QAA, Higher Education Academy and professional bodies. The key credit consortia should also be involved in this process (SEEC, NUCCAT, CQFW etc).

The University already uses a learning outcome approach and it believes that the mapping process could be complete within a three-year timescale. Year 1 would be for undertaking initial discussions, year two for consultation and final agreement with matching then being undertaken in year three. In reality it would expect some drift in this process and whilst the majority of provision will be readily mapped against the EFQ, there will need to be more extensive discussion around some qualifications. A five-year timescale is more realistic.

Sectoral Qualifications

The framework would not represent a radical development for the majority of UK Higher Education and would further extend work which is already underway. However, the framework could assist in a number of areas such as:

- Establishing equivalence between academic, vocational and professional qualification (but it will be important for institutions to maintain autonomy over admission policies).
- Assisting with equivalence issues across sectors.
- Encouraging student mobility across national boundaries and credit accumulation processes.
- Supporting staff mobility and joint ventures between higher education providers.
- Encouraging workforce development across boundaries and mobility in employment.

Individual qualifications should be able to articulate in more precise detail the specific knowledge, skills and competencies that they develop. It will be important that the Europass and institutional transcribing systems adequately capture this information to support mobility.

There will need to be widespread consultation and development to ensure that there is greater understanding and consistency of application. At present, understanding is limited to those whose role is directly related to credit accumulation and admissions. The language that is used and the means of communication have to engage with all stakeholders.

Mutual trust

In the University's opinion mutual trust requires a number of actions to be undertaken:

- Clear agreement about the aims of the EQF and its possible use
- Clear, consistent and accessible information
- Engagement with all stakeholders
- The consistent use of the framework in national documentation and policy developments over an extended period of time
- Greater understanding and working across boundaries (between sectors of education, between education and professional bodies, between employers and education etc)

The University is supportive of developments towards an EQF provided that the framework allows for local flexibility. It would oppose moves towards standardisation or towards definitions of credit and qualifications which do not align with current UK practice.

Mark Atlay
Head of Teaching Quality Enhancement
University of Luton
Park Sq
Luton
LU1 3JU