

Towards a European Qualifications Framework for Lifelong Learning: Response

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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?*
We are content with the idea of an EQF as a meta-framework that serves to relate other frameworks and facilitates transparency and mobility. However, the document omits any consideration of how the EQF could or should relate to the qualifications framework for the European Higher Education Area. Unless these are carefully aligned there is a serious risk of confusion and inefficiency that would work against the intended benefits.
- *What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?*
We find it hard to give any useful answer to such a general question.

The reference levels and descriptors

- *Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?*
Probably not, but if it were more detailed it would probably be too complex to be useful, so it is probably a useful simplified model for its intended purpose.
- *Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?*
They probably do so as adequately, and as inadequately, as any such set of descriptors.
- *What should be the content and role of the 'supporting and indicative information' on education, training and learning structures and input (table 2)?*
No response.
- *How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?*
This would require a national framework that is at present lacking. We reject any suggestion that the framework should determine detailed national and local arrangements.

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?*
This question seems to have become garbled. In response to what we think is intended, we again note the need for care to avoid any implication that the EQF might determine detailed national and local arrangements.
- *How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?*
Such an approach is already well developed.

Sectoral qualifications

- *To which extent can the EQF become a catalyst for developments at sector level?*
This seems unlikely.
- *How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?*
No response.
- *How can stakeholders at sector level be involved in supporting the implementation of the EQF?*
No response.
- *How can the link between sectors development and national qualifications be improved?*
No response.

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?*
Development of understanding should help to develop trust.
- *How can the EQF become a reference to improve the quality of all levels of lifelong learning?*
A framework for qualifications helps to define and assure standards, but it is more difficult to see how it can improve quality.

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