

Towards a European Qualifications Framework for Lifelong Learning

A NIACE Response to the European Commission Staff Working Document

On July 26th 2005 The Lifelong Learning Directorate of the European Commission's Directorate-General for Education and Culture issued a consultation document entitled 'Towards a European Qualifications Framework for Lifelong Learning' and invited responses to this document. This is the response to the Commission from the National Institute for Adult Continuing Education (NIACE) which represents the interests of adult learners in England and Wales.

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1. 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. In particular NIACE welcomes the clear aim of the EQF to support lifelong learning. Within this the more specific objectives of supporting the mobility of learners and to strengthen mutual trust between key stakeholders involved in lifelong learning are important objectives.

NIACE would like to see a little more emphasis in the document on the benefits of the EQF in enabling national and sector education and training systems to communicate more clearly to learners the outcomes and benefits of particular learning opportunities within a European context.

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

NIACE supports one of the central propositions in the EQF document – that the Framework itself can only provide a structure within which national systems need to make real some of the potential benefits of the Framework. In particular, NIACE welcomes the commitment in the paper to move forward to develop the implementation and dissemination of an integrated European credit transfer and accumulation system for lifelong learning. In themselves, the reference levels of the EQF cannot ‘make’ the EQF work in practical terms. The proposed credit system is an essential development if the EQF is to have more than a marginal impact on national qualification systems.

2. The reference levels and descriptors

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

The experience of developing level descriptors in the UK context is that concise and clear, rather than lengthy and detailed, descriptors are needed in order to ensure that the Framework is capable of effective use by practitioners. In the same vein, the Framework requires the minimum number of levels to ensure its basic objectives can be met, rather than the maximum number to ensure that all existing concepts of level across European education and training systems can be met. In this context the decision to base the EQF on eight level descriptors seems to be a sensible and practical outcome of collaboration across a number of existing Frameworks.

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

NIACE welcomes the explicit commitment in the document to base the language of the level descriptors on learning outcomes. This is a well-established approach in the UK, and we believe it is based on the sound principle that learners have the right to know where a particular programme of learning aims to take them. It also provides a sound and equitable basis on which to make sound judgements about learner progress and achievement through their programme of learning.

The descriptors set out in Table 1 of the EQF document are clear and relatively brief. In this sense they seem fit-for-purpose and, although they may be improved through detailed consultation, NIACE would be concerned if any more detail was added. They are sufficient to enable national qualification systems to relate to them, and to enable practitioners to locate qualifications at one level rather than another.

In considering the future development of the level descriptors, NIACE notes with interest the 'main principles' of a future system of credit accumulation and transfer set out in Section 7.1. of the paper. Two of these principles are:

- Units of learning for which credit is to be accumulated should be linked through national arrangements to the levels in the EQF
- It must allow for the transfer of units

NIACE fully supports these principles, and in this context we suggest that the EQF level descriptors need to be fit for the future purpose of determining the level of individual units rather than whole qualifications. In this context the descriptors themselves may be too complex, and perhaps the 'Indicative Summary of EQF Levels' in Annex 2 could be refined to become a useful tool for this purpose. If so, then the current linguistic construct of this Summary, which relates to the level of a qualification rather than the level of learner achievement, needs to be reviewed to bring it into line with the format of the broader level descriptors.

What should be the content and role of the 'supporting indicative information' on education, training and learning structures and input (table 2)?

NIACE questions the value of Table 2 and would prefer to see the clear commitment to a learning outcomes approach in the EQF confirmed by the removal of this Table from the document. If the Table is to be retained at all then NIACE would prefer its status to be described as 'illustrative'. Indeed we think the EQF document itself hints at this status. We do not believe that Table 2 should be presented as 'advisory' or 'exemplary' in this context, as in our view it serves only to compromise the clarity of the level descriptors themselves, and threatens to perpetuate the (in our view unsustainable) possibility that a functioning system for recognising learner achievements within the EQF can be established using an 'input-based' series of descriptors.

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

At first glance it would seem that our 'national' qualifications system can be easily matched to the EQF levels. Certainly in recent years the reform of qualifications systems in England, Wales and Northern Ireland means that reference to the eight EQF levels by both Higher Education and by other providers of education and training can easily be made. However, we are aware that, in European terms, it is the UK, rather than its component jurisdictions, that should be the object of this 'national' dimension, and here we are not so sure that a simple matching to the proposed levels can be easily achieved, as there are clear differences in approach between Scotland and the other UK jurisdictions in this regard. This does not mean that the

eight level basis of the EQF should be changed, but it does mean that a 'UK level' matching of national qualification levels to the EQF is not currently possible. We await with interest the response of colleagues in Scotland to this question.

3. National Qualifications Frameworks

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

As the above answer indicates, there are issues to be addressed within the UK itself about the concept of a single National Qualifications Framework for lifelong learning. However, even within the different jurisdictions of the UK there are some developments in the current national qualifications systems that would enable the UK to support in practical terms the future development of the EQF. Four such measures are suggested in this regard:

- The development of a genuinely inclusive qualifications framework in England, Wales and Northern Ireland that is capable of including achievements recognised through community-based and work-based learning as well as through more formal provision
- The removal of current distinctions between 'general' and 'vocational' qualifications within the current regulatory framework for qualifications (particularly in England)
- The development of closer alignment between HE frameworks and other qualification frameworks that would enable the articulation of systems for recognising learner achievement between these 'sub-frameworks'
- The development of a functioning system of credit accumulation and transfer that would serve to interconnect all qualifications within this framework and begin to deliver on some of the broader economic and social objectives that inform both the Bologna and Copenhagen agreements that have informed the development of the EQF

If such a framework was to be established across England, Wales and Northern Ireland we are confident that agreements could be reached with the separate qualifications framework in Scotland that would enable us to relate practically to the EQF at UK level in due course.

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

The current reform of qualifications systems across the UK will confirm and further develop the value of a learning outcomes approach to the recognition of learner achievement. NIACE fully supports this particular feature of current qualifications reform programmes in the UK.

4. Sectoral qualifications

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

We do not have sufficient knowledge or experience of different European sectors to comment on this question.

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

By pushing forward as soon as possible on the proposals in Section 7.1 of the EQF document to establish a functioning system of credit accumulation and transfer within the EQF.

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

We do not know enough about sector level stakeholders to respond to this question.

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

By ensuring that the design specifications of a system of credit accumulation and transfer are subscribed and implemented by all stakeholders seeking to represent their sectoral or national qualifications within the EQF.

5. 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?

NIACE notes the outcomes of the recent OECD study (2004) of national qualifications frameworks and suggests that the two key factors in developing effective arrangements for mutual trust within such national frameworks, are a sound legislative basis for the framework, and time. The EQF needs to support the development of national qualification frameworks that have a sound regulatory basis and which are supported in their development over time through effective partnerships between key stakeholders.

Although the EQF is itself a voluntary framework it can still exert influence over such developments so that mutual trust can be developed both within and between different national systems. Mutual trust, based on a sound legislative status for the national framework, will be an essential feature of any effective system of credit accumulation and transfer.

The EQF also needs to ensure that its other related initiatives – the Europass and the Ploteus portal – are also deployed in pursuit of this goal. Although the reference levels of the Framework are an important constituent element of an overall framework to support lifelong learning, it will be the effective functioning of a system of credit accumulation and transfer that brings to life the intended objectives of the EQF, and both the Europass and the Ploteus portal have potentially important roles to play in supporting the long-term development of mutual trust between stakeholders that will be essential to the achievement of the EQF's long-term objectives.

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

The issue of quality improvement needs careful consideration. Although the EQF can provide an important baseline for the development of quality systems through its reference levels and their explicit basis in learning outcomes, the improvement of the quality of lifelong learning falls very clearly within the remit and capacity of national governments to influence. NIACE suggests that a focus on structural and technical tools, rather than on the development of quality improvement systems, should form the focus for work on developing the EQF further.