

Response to the Commission of the European Communities
Working Document
Towards a European Qualifications Framework for Lifelong Learning

**This response is submitted by NUCCAT, the UK
Northern Universities' Consortium for Credit Accumulation and Transfer**

NUCCAT has 46 members from across the north of England, representing both the HE sector and FE colleges which deliver HE. NUCCAT therefore benefits from a broad spread of mission and practice and provides a forum for discussion of credit-related issues including programme design, assessment, admissions and progression. This response reflects discussion of the Commission's consultation paper at the Quarterly Meeting of NUCCAT held on 29 September 2005. Any queries about this response should be addressed to the Chair of NUCCAT, Beatrice Ollerenshaw, Deputy Academic Registrar, Durham University.

The Consortium welcomes the proposed framework for lifelong learning across Europe as a contribution to the developing integration and mutual recognition of learning of different types undertaken in different contexts and modes and at different times in the learner's development. We welcome the work of ECVET as well as that undertaken within the Bologna Process which resulted in the Qualifications Framework for the EHEA, and we support the aims of the proposed Framework for Lifelong Learning to provide an over-arching framework applicable to both vocational and academic learning. We have, however, some concerns which we hope will be taken into account in refining the proposals.

1. The lifelong learning framework is presented as a meta-framework which will provide over-arching parameters for the calibration of national frameworks and hence of the individual programmes set within national systems. However the lifelong learning framework itself is extremely detailed and NUCCAT believes that this has resulted in excessive complexity which is actually detrimental to its role as a meta-framework.

A meta-framework for qualifications should reflect the levels and outcomes of final awards rather than the processes by which learners reach those targets; the more complex the framework the more difficult it will be to achieve the mapping which calibrates awards. A multiplicity of levels will create confusion between the stages of progression within the award (represented in learning units or modules) and the outcomes of the award itself. An over-complicated meta-framework may therefore intrude in an inappropriate way into the process of curriculum design which is properly a matter for the provider in the light of national requirements and systems. Such requirements would influence the number and specification of levels, including the levels of progression within awards from school to bachelors, masters or doctoral level or equivalent. NUCCAT therefore believes that the proposed framework is not in fact a meta-framework which will facilitate calibration of awards within each cycle, but a detailed framework in its own right such as might be produced at national level to reflect local educational structures.

To fulfil its function as a meta-framework we therefore suggest that less detail be included in the descriptors and that the levels specified be confined to the levels of award at the end of each cycle. This will leave national frameworks the freedom to identify interim levels, consistent with their own educational

structures, which will lead the learner through the evolving process of achievement to the point at which s/he can attain the award. In this way the meta-framework will truly focus on qualifications.

2. The framework includes a mapping of its level descriptors to those in the Dublin Descriptors. However this mapping is not accurate. For example, the framework highlights at level 8 the outcome that an award-holder should be capable of demonstrating '*the promotion of social and ethical advancement through actions*'. However the comparable learning outcome in the Dublin Descriptors is that an award-holder '*can be expected to be able to promote, within academic and professional contexts, technological, social or cultural advancement in a knowledge-based society*'. The wording in the framework therefore reflects a subtle but significant change of emphasis. In the first instance, such inaccuracy is simply unacceptable. But secondly, the revised wording of the framework is susceptible of political or ideological manipulation which could infringe the intellectual autonomy of universities. We urge most strongly that these inconsistencies between the framework and the Dublin Descriptors be rectified in the final version of the framework so that it truly reflects the descriptors which were adopted for the European Qualifications Framework.

3. If the framework is indeed to encapsulate the full range of lifelong learning NUCCAT finds it strange that professional learning accredited under the Directive on professional qualifications is excluded from the scope of the framework. The reason given for this is that the Directive covers learning '*based on measurable criteria such as the type and duration of training or professional experience*' – ie based on inputs rather than outcomes. Our experience in the UK, however, for example in relation to engineering, provides evidence that input-based and outcomes-based criteria can be applied to the same programme of study and award. We would therefore press the Commission to ensure that provision covered by the Directive is not excluded from the framework, so that the framework can truly fulfil its purpose across the full span of lifelong learning.

NUCCAT hopes that these comments will be helpful to the Commission in refining its proposed framework for lifelong learning.

Beatrice Ollerenshaw
Chair of NUCCAT
University of Durham
Old Elvet
Durham DH1 3HP
Beatrice.Ollerenshaw@durham.ac.uk

Sent by email to EQF@cec.eu.int