

European Qualifications Framework

Consultation Response Form

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The Scottish Executive is the civil service accountable to Scottish Ministers. The Executive has legislative and executive responsibility for a wide range of devolved matters, including education and training.

1 a) 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?

The Scottish Executive warmly welcomes the proposal for the development of a European Qualifications Framework (EQF), and fully supports the principles of the EQF as a voluntary, meta-framework which aims to develop transparency at the European level and to encourage transfer and recognition of qualifications.

We enthusiastically endorse the objectives and functions as set out on page 4 of the consultation document. We strongly support a descriptive meta-framework, and believe that it is important that the EQF is developed as it is described, ie as a meta-framework, and that it is simple to understand and use. It is important to stress that the EQF is a meta-framework for lifelong learning, which will neither supplant national qualifications frameworks, nor the Framework for Higher Education developed through the Bologna process.

The proposal, however, reflects an academic discourse rather than adopting a clear lifelong learning approach. For example, informal and non formal learning appear to be defined in deficit, and the proposal emphasises the cognitive over the affective.

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

Although a tool for institutions and practitioners to use, the EQF's purpose should be communicated as appropriate. The benefits of the EQF need to be communicated widely so that there is a common understanding at grassroots level.

To be successful, the EQF needs to be:

- **an overarching simple, clear, non-regulatory framework based on transparency and trust;**
- **understood by those not familiar with educational terminology; and**
- **consistent with developments in credit transfer**

Importantly for Scotland, it is important that the interpretation of national qualifications frameworks is not simply at EU member state level. As mentioned earlier, education and training are devolved matters for the Scottish Executive – the UK Government has no legislative powers in Scotland for qualifications framework developments. The Scottish Credit and Qualifications Framework (SCQF), launched in 2001, is a voluntary, non-regulated lifelong learning framework, which brings together the 4 main qualifications frameworks in Scotland (National Qualifications Framework, Higher National Qualifications Framework, Framework for Higher Education Qualifications, and Scottish Vocational Qualifications Framework). Qualifications in these separate frameworks are now described in the common language of SCQF level and credit, and the SCQF is now embedded in school, college, university and increasingly work-based qualifications in Scotland. For example, over 140,000 school students received their qualifications certificates this year with SCQF used to describe the qualifications achieved. The SCQF offers a useful meta-framework model which the Commission may wish to consider as it develops the EQF.

The reference levels and descriptors:

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

Yes, the 8 levels offer broad reference levels which adequately reflect most lifelong learning. However, for the EQF to truly be an inclusive lifelong learning framework, the Commission should consider lower levels, to reflect school qualifications and/or 'entry' level qualifications. If not, the EQF will exclude those who may have difficulties in learning or those learning to learn.

The level descriptors need to be carefully described to enable them to embrace all forms of learning.

2 b)

- Do the level descriptors, in table 1 of the consultation document, adequately capture learning outcomes and their progression in levels?
- What should be the content and role of the 'supporting and indicative information' on education, training and learning structures and input (in table 2 of the consultation document)?
- How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?

The level descriptors are broad and generic, and appropriate for a meta-framework. The learning outcomes approach is one that we fully support and this approach will help ensure recognition of learning in many different contexts, including the recognition of informal and non-formal learning. However, the role of recognising informal and non-formal learning should remain at national level and should be intrinsically linked to national qualifications frameworks rather than the EQF. The EQF should act as a translation device only.

Table 2 is not necessary and is likely to lead to confusion.

All mainstream Scottish qualifications are now in the Scottish Credit and Qualifications Framework, and these would be matched to the EQF through the SCQF. Sectoral qualifications are now being placed in the SCQF and, again, would be matched to the EQF via the SCQF. It is important that individual qualifications are not matched directly to EQF levels, but to national qualifications frameworks, which in turn would be aligned to the proposed EQF. In Scotland, we would conduct a mapping exercise between levels in the SCQF and the EQF.

3 National Qualifications Frameworks

- How can a National Qualification Framework for lifelong learning – reflecting the principles of the EQF- be developed in your region?
- How, and within what timescale, can your national qualifications systems be developed towards a learning outcomes approach?

There is no single national qualifications framework for the UK. As stated earlier, the Scottish Executive has legislative responsibility for education and training in Scotland and, with partners, has developed the SCQF as its unified lifelong learning framework. A comprehensive, integrated lifelong learning framework for school, college, higher education and vocational qualifications, the Scottish Credit and Qualifications Framework, has been operational since 2001. The aims of the framework are similar to those envisioned for the EQF, to:

- **assist people of all ages and circumstances to access appropriate education and training over their lifetime to fulfil their personal, social and economic potential; and**
- **enable employers, learners and the public in general to understand the full range of Scottish qualifications, how they relate to each other and how different types of qualifications can contribute to improving the skills of the workforce.**

Like the EQF, the SCQF is an overarching framework (based on 12 levels which includes access levels) and any programme of learning which is based on learning outcomes and has quality assured assessment can be included in the Framework. The SCQF includes 4 operational qualifications frameworks – all of which use a learning outcomes approach - and allows movement and credit transfer between these. As the UK does not have a single qualifications framework, it is important that there is recognition of the separate country frameworks in the UK and that each is able to align directly with the EQF.

4 Sectoral Qualifications

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

- How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?
- How can stakeholders at sector level be involved in supporting the implementation of the EQF?
- How can the link between sectors development and national qualifications be improved?

The link between sectoral qualifications and national qualifications frameworks is vital. It is important that sectoral qualifications articulate first with their national qualifications framework. In Scotland we are working with the Sector Skills Development Agency and the Sector Skills Alliance Scotland to map out sectoral qualifications within the SCQF.

It is important that through the development and implementation of the EQF, that its relationships to national qualifications frameworks and sectoral frameworks are communicated well and at the right time. Stakeholders should be involved in the process at each stage.

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

As a voluntary framework, it is vital that strong and effective partnerships are created at national level. The development or strengthening of national frameworks should ensure that quality assurance principles are common within national frameworks (in particular integrated frameworks such as the SCQF).

It is important that the EQF does not replace or undermine existing arrangements arising from the Bologna process. Indeed, we believe that it is very important that it builds on the experience and knowledge gained through both Europe-wide as well as national developments.

The Scottish Executive agrees that quality assurance is vital to the EQF and is an area which needs to be explored in greater depth than is covered in the consultation document. Common principles for quality assurance should be generic enough to encompass the needs of different education and training sectors, eg higher education and VET.

6 Any other comments on the EQF proposal:

Given the wide range of learning that needs to be taken into account and the different stages of development of national qualifications frameworks in countries across Europe, we would urge the Commission to develop and implement the EQF slowly, to learn from the work we have done in Scotland, and the success we have had in stakeholder engagement and partner buy-in. Ensuring maximum buy-in from all stakeholders involved takes time and it is important that this is allowed. There is a need to ensure that, across Europe and across sectors, we have a shared understanding of the concepts and terminology used. The recent UK Presidency conference in Glasgow demonstrated clearly that there is much to be done in this area.

We would urge the Commission to test and trial the proposed model further over a period of time, This will identify any key issues or problems and allow them to be addressed early in the process of implementation.

