

## **Response from Universities Scotland to the European Commission's consultation on a proposed European Qualifications Framework for Lifelong Learning**

Universities Scotland strongly supports the concept of a meta-framework which is broad and generic in nature and which complements existing and developing frameworks in Europe, such as the framework for qualifications of the European Higher Education Area and national HE qualifications frameworks. Universities Scotland has also contributed to, and fully supports, the response from the Scottish Credit and Qualifications Framework.

Universities Scotland also strongly supports the concept of qualifications frameworks based on learning outcomes that cover the whole range of lifelong learning. Indeed, Scotland's universities, along with the Quality Assurance Agency Scotland, have built up significant experience in the development and implementation of a national credit and qualifications framework for lifelong learning, and an enhancement-led approach to quality assurance. While we would be happy to share our experience, we recognise that our framework is not a model for other countries to follow, as each country's national qualifications framework will have its own purposes and context, nor indeed is it a model for a European Qualifications Framework for lifelong learning, because a European Framework will necessarily be more generic and less detailed and has a different purpose. The Scottish HE sector is nevertheless keen to contribute to, support and learn from developments in other parts of Europe.

We wholeheartedly support the proposal that a framework such as the EQF should be defined as a high level meta-framework that enables different education and training frameworks and national frameworks to be related to each other. The framework must be capable of accommodating, and indeed facilitating, ongoing development and diversity of qualifications frameworks and national frameworks to meet emerging needs. To this end we warmly welcome the idea of a system of broad levels and associated general descriptors that provide a reference point for national frameworks.

It is for national frameworks and or other developments such as the EHEA framework to describe the characteristics of the qualifications in/link to those frameworks - thus the Bologna descriptors are specifically designed to describe the nature of HE qualifications and by definition are not appropriate for other types of qualification. However, they can be *consistent with* the type of descriptors which are meta-level, more generic and less detailed which are necessary for a broader, more inclusive framework, such as the proposed EQF for lifelong learning.

Universities Scotland therefore strongly supports the continuation of the EHEA-framework as the overarching framework for the HE sector.

We welcome the acknowledgement of the importance of effective assurance of quality and standards, and the responsibilities of member states, institutions and relevant stakeholders to define and implement QA policies and procedures, guided by common broad principles at European level.

The Scottish HE sector would question the appropriateness of the third of the three proposed 'core elements', namely the set of 'common principles and procedures', including those relating to 'quality assurance, validation, guidance and key competences', as these would appear to go a significant way beyond what is necessary for a meta-framework and have the potential to conflict with or even undermine, other existing and developing frameworks, such as national HE frameworks and the Framework for Qualifications of the European Higher Education Area. Any overarching, generic framework must, by definition, be less detailed if it is to be compatible with a number of different

qualifications frameworks and/or qualifications systems (e.g. schools, FE, HE, VET, professional bodies, industrial sectors).

## Conclusion

We warmly welcome the purpose as defined in the section 'main purposes and functions' on page 4 of the consultation document. In order to ensure that these purposes and functions as outlined are achieved, it will be important to avoid too much detail in the design of the EQF for Lifelong Learning, as we indicate in our detailed comments in the body of this response.

We therefore believe that it is essential that the proposals are clarified further, to avoid any doubt and confusion between the roles and purposes of the EQF in relation to the 'Bologna' framework for the EHEA and to national qualifications frameworks. In particular, we believe that there is too much detail in the current proposals for what is intended to be a meta-framework and there is a danger that confusion may arise between the purpose of this framework and other frameworks. We believe that it is important to emphasise that individual qualifications will reside in national qualifications frameworks and it will not be appropriate to seek to place individual qualifications within, or indeed, articulate them directly with, the proposed EQF for lifelong learning.

It is also important to stress that the two processes i.e. EQF and Bologna do not have the same purpose- they complement each other - the EQF should set out the broad framework of reference levels - these reference levels need to be very broad and capable of relating to the great diversity of qualifications and learning at each level (academic, community, vocational, professional etc) and should not attempt to determine/describe the nature/purpose/characteristics of the particular qualifications - this is the role of national authorities in the case of national frameworks and the Bologna and Copenhagen processes in relation to European developments.