



**The Scottish Credit and
Qualifications Framework**

Scottish Credit and Qualifications Framework

Response to the Commission of the European Communities

Towards a European Qualifications Framework for Lifelong Learning

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The Scottish Credit and Qualifications Framework (SCQF) was established by a partnership of national bodies in Scotland – the Quality Assurance Agency for Higher Education (QAA) the Scottish Qualifications Authority (SQA) Universities Scotland and the Scottish Executive. Known as the Development Partners, these organisations are at the forefront of developing the framework, which provides a national vocabulary for describing learning opportunities and makes the relationships between qualifications clearer.

The SCQF is central to the strategy for lifelong learning in Scotland as it aims to:

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

To assist in meeting these aims the Development Partners established a Joint Advisory Committee (JAC) which provides an important locus for key stakeholders to identify ways in which the SCQF can be used to assist in widening access, encouraging participation and ensuring the development of people's skills and knowledge to their full potential.

The Joint Advisory Committee comprises of senior representatives from the following organisations:

Association of Directors of Education Scotland
Association of Scottish Colleges
Careers Scotland
Confederation of British Industry, Scotland
Chartered Institute of Bankers, Scotland
Communities Scotland
Convention of Scottish Local Authorities
Head teachers Association Scotland
Highlands and Islands Enterprise
HM Inspectorate of Education
Learn Direct Scotland
National Unions of Students –Scotland
Quality Assurance Agency for Higher Education
Scottish Advisory Committee for Credit and Access
Scottish Enterprise
Scottish Executive: Education Department
Scottish Executive: Enterprise, Transport and Lifelong Learning Department
Scottish Funding Council
Sector Skills Alliance Scotland
Scottish Qualifications Authority
Scottish Trade Union Council
Universities Scotland

In responding to the Commission's consultation document *Towards a European Qualifications Framework for Lifelong Learning* on the European Qualifications Framework the Development Partners consulted with the Joint Advisory Group and their collective response is submitted to the commission.

1. THE RATIONALE OF A EUROPEAN QUALIFICATIONS FRAMEWORK

1.1. Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?

The Scottish Credit and Qualifications Framework Development Partners enthusiastically endorse the creation of a descriptive high-level meta-framework and in particular, the objectives and functions as set out in the “main purposes and functions” section on page 4. The document should make it clear that this framework for lifelong learning will not supplant national frameworks nor the Bologna or Copenhagen processes and will not be regulatory.

The main advantage of the EQF is its potential as a translation device which will enable national frameworks to relate to one another in a clear and consistent manner hereby helping transparency and mutual understanding of different types of learning and training, qualifications and frameworks of the different countries. In these ways, an EQF has the potential to support individuals as they move across borders to take up opportunities for work or study and for employers as they recruit from a Europe wide pool of skilled workers.

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

The EQF needs to have clear and agreed goals which are distinct from those of other (including national) frameworks and must:
have an appropriate communication strategy across all stakeholders

- Enable transparency and mutual understanding of qualifications between countries. This will be essential for individuals seeking recognition for their qualifications.
- Be consistent with developments in credit transfer
- Be capable of relating to the diversity of qualifications across the European Union
- Be understood by those not familiar with educational terminology

2. THE REFERENCE LEVELS AND DESCRIPTORS

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

The structure provides useful points of reference and comparison for national and other frameworks such as the Bologna framework for higher education, providing the level descriptors are clear and generic enough to allow national systems to align their own levels against it. The 8 level structure is sufficient to provide an overarching framework with broad reference levels but may not capture all levels of lifelong learning. To provide an inclusive lifelong learning framework the addition of an “entry” level with its own level descriptor is considered important.

2.2. Do the level descriptors in Table 1 adequately capture learning outcomes and their progression levels?

The descriptors are very broad generic level descriptors as appropriate for a meta-framework. They should be reviewed for suitability across all disciplines/sectors. There is a need to make clear that the levels and their descriptors are just that; descriptors of levels and not qualifications. The EQF and the Bologna frameworks complement each other and do not have the same purpose. The EQF should set out the broad framework of reference levels capable of relating to the great diversity of qualifications and learning at each level. As currently proposed, it appears that the lower levels are very VET oriented while the upper ones are more HE oriented. We believe that a qualifications framework for lifelong learning should be generic enough to be inclusive of all types of learning.

2.3. What should be the content and role of the “supporting and indicative information” on education training and learning structures and input (table 2)

This information is not necessary and is likely to lead to confusion.

Table 2 confuses the justification for aligning particular qualifications to an EQF level as a qualification.

A qualification may align with the characteristics at a particular EQF level on Table 1 but does not meet the context of applicability described in Table 2.

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

Individual qualifications should not be matched directly to the proposed EQF the purpose of which should be to enable articulation and translation between national frameworks. National frameworks will be aligned to the EQF. The way we do this will be to conduct a mapping exercise between the levels in the SCQF and the EQF levels to ascertain the alignment.

It would be desirable if the Bologna Framework was located against the EQF levels.

3. NATIONAL QUALIFICATIONS FRAMEWORKS

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

Scotland has a National Qualifications Framework, the Scottish Credit and Qualifications Framework which has been operational for some time now. Like the proposed EQF, SCQF is an overarching framework, based on learning outcomes and which includes 4 operational frameworks and allows movement and credit transfer between frameworks.

The UK does not have a single framework and there should be recognition of the separate UK frameworks.

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

All Scotland's national qualifications systems already use a learning outcomes approach.

4. SECTORAL QUALIFICATIONS

4.1. To which extent can the EQF become a catalyst for developments at sector level?

If the EQF is accepted as a vehicle for easing the path of worker mobility, developments at sector level can be tied into this meta framework.

Sectoral qualifications should be linked to national framework which should align with EQF. While it is appropriate to have Europe wide competences etc – qualifications should be located within national frameworks,

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

This is unclear. This aim appears to be in direct conflict with the stated aims of the framework i.e. “to enable qualifications frameworks and systems at national and sectoral level to be related to each other” This level of detail needs to reside in national or sectoral frameworks. National/sectoral frameworks based on learning outcomes can provide the transparency required by all stakeholders.

These descriptors should not attempt to determine/describe the nature/purpose/characteristics of particular qualifications. It is for national frameworks and other developments such as Bologna to describe the characteristics of the qualifications at those levels.

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

This will only be achieved if the stakeholders within the sector consider the EQF of benefit to their particular sector. This will require good communication and information about the purposes of the EQF. Those already engaged with National Qualifications Frameworks, such as SCQF, already have experience of engaging with sector stakeholders and can play a lead role in disseminating the alignment agreements of other frameworks to the EQF. We believe that national authorities and frameworks should be the main locus for considering and supporting implementation. Stakeholders at sectoral level can play a key role in publicising the EQF and how it can meet the needs of the workforce at all levels.

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

Through involving sectors in development of national frameworks capable of describing different types of learning for comparison purposes and align national framework to EQF

5. MUTUAL TRUST

5.1. How can the EQF contribute to the development of mutual trust (eg based on common principles for quality assurance) between stakeholders involved in lifelong learning at European, national, sectoral and local levels?

Trust in the quality assurance mechanisms that underpin national frameworks is essential.

EQF must not replace or undermine existing arrangements eg Bologna and Copenhagen. Any common principles for quality assurance must be sufficiently generic to encompass quality assurance principles in different education and training sectors (eg those created for the Bologna process for HE).

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

By becoming established as a framework that sectoral and national frameworks align/relate to. National arrangements for quality assurance and national frameworks are paramount to improving quality of all levels of lifelong learning.

There are limits to what the EQF itself can do. Its primary purpose is a translation device and it is not the role of the EQF itself for improving quality. It is also the reference point for the development of national frameworks, which should, amongst other things aim to improve quality and standards and public understanding at all levels.