

## **Response to European Commission Consultation on a proposed *European Qualifications Framework***

SEMATA (*Science, Engineering, Manufacturing Technologies Alliance*) is the United Kingdom **Sector Skills Council** for Science, Engineering and Manufacturing Technologies.

SEMATA covers some 100,000 companies employing 2,500,000 people in the UK. These companies provide up to 10% of UK Gross Domestic (GDP) - £74 billion every year – and contribute 33% to total UK Exports.

Led by the sector, for the sector, SEMTA is working closely with its *Sector Strategy Groups* to drive improvements in productivity by transforming skills in:

- Aerospace
- Biotechnology
- Electrical engineering
- Electronics, including semiconductors
- Engineering metal products
- Forensic Science
- Mathematics
- Mechanical Engineering
- Meteorology
- Motor vehicle manufacture
- Nanotechnology
- Optical manufacture
- Pharmaceuticals
- Shipbuilding/ship repair/boatbuilding and repair

SEMATA's Key Goals are to:

1. Improve productivity, business and public service performance
2. Reduce skills gaps and shortages and anticipate future needs
3. Increase opportunities to boost the skills and productivity of everyone in the sector, and
4. improve learning supply, including apprenticeships, higher education and national occupational standards

SEMATA, and the key employers who actively work with it providing sector leadership, recognize the growing internationalization of the markets in which UK businesses operate. The United Kingdom economy is significantly embedded within the European Union's "Single Market", and in certain sectors (*Automotive* is a particularly strong example) UK enterprises are deeply integrated in (and dependent upon different players in) European value chains, involving enterprises in other Member States. In addition, the implication of SEMTA's remit in working in support of raising the productivity of UK enterprises relates to their international – indeed global – competitiveness with the sector markets. Thus the international dimension cannot be ignored, and is of significance for SEMTA, partly in relation to international supply chains and partly in relation to better understanding of competitive environments and

skills policy approaches in countries with competitor companies. SEMTA employers are already making use of workers from other Member States, not least those from new Member States.

SEMTA therefore welcomes the proposals by the European Commission (D-G Education and Culture) to provide an opportunity for greater coherence on qualification arrangements and structures within the European Union, and would want to collaborate in an examination of how coherence might be increased within the sectors for which it has responsibility.

As can be seen, SEMTA's sectoral "footprint" is particularly wide, and it is likely that SEMTA's contribution in this area would initially be greatest in the industries where it has focused its main attentions in recent years, in particular in relation to its *Sector Skills Agreement* – the major formal commitment, by employers and a range of stakeholders, to a concerted programme tackling skills issues in order to achieve SEMTA's Key Goals for the sector as a whole. These sub-sectors are:

1. Automotive
2. Aerospace
3. Electronics, and
4. Marine Engineering

SEMTA therefore proposes to explore, in collaboration with the Commission and appropriate partners in certain key Member States, the qualification arrangements in these sectors, and review how these, and planned developments, can benefit from the opportunities arising from the introduction of the proposed EQF. It is likely that the greatest benefits can be gained in this area within the Automotive industry.

The table shows how SEMTA currently views those opportunities, in relation to the questions asked in the EQF consultation document.

## SEMTA Responses to EQF Consultation questions

Question	SEMTA Response
<b><i>The rationale of an EQF</i></b>	
<ul style="list-style-type: none"> <li>• Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?</li> </ul>	In broad terms, although the <b>objectives</b> are not as clearly stated as they might be, and the underlying assumption of significant barriers to mobility needs to be further clarified.
<ul style="list-style-type: none"> <li>• What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?</li> </ul>	The reference level structure needs to “fit comfortably” in relation to a significant number of national qualifications frameworks, and substantial equivalence of level must be accepted – in relation to “bilateral specifics” - by national authorities.
<b><i>The reference levels and descriptors</i></b>	
<ul style="list-style-type: none"> <li>• Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?</li> </ul>	It is likely that eight levels would be sufficient to capture the Knowledge, Skills and Competence needs of those involved in SEMTA’s sectors
<ul style="list-style-type: none"> <li>• Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?</li> </ul>	The Table 1 descriptors seem comprehensive enough to capture learning outcomes. Initial examination of how the descriptors could be interpreted for significant existing SEMTA qualifications suggest that it should be possible to attribute an “on balance” level to a qualification in spite of the fact that the likely levels of Knowledge, Skills, and Wider Competence components may not be identical.
<ul style="list-style-type: none"> <li>• What should be the content and role of the ‘supporting and indicative information’ on education, training and learning structures and input (table 2)?</li> </ul>	The two major challenges for successful implementation (significant take-up within Europe) of the EQF are: a) the effectiveness of consistent discrimination between adjacent levels and b) acceptance by each national authority of the level allocation in other Member States. Tables 1 & 2 must, between them, enable these objectives to be achieved.
<ul style="list-style-type: none"> <li>• How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?</li> </ul>	For the UK: this will depend to a large extent on the acceptance of the levels defined for the emerging <b>Framework for Achievement</b> and the level coherence between the frameworks in the 4 UK “devolved administrations”. For SEMTA’s sectors, this will require explorations and collaborations between sector bodies in different Member States.
<b><i>National Qualifications Frameworks</i></b>	
<ul style="list-style-type: none"> <li>• How can a National Qualification Framework for lifelong learning be developed in your country – reflecting the principles of the EQF-be established?</li> </ul>	There has been considerable experience with NQFs, but – as indicated above – there remain issues to be resolved. All relevant frameworks within the UK draw on the principles embodied in the EQF.
<ul style="list-style-type: none"> <li>• How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?</li> </ul>	This has already happened, although there remain challenges, in particular in terms of take up and credibility of NVQs

<b>Sectoral qualifications</b>	
<ul style="list-style-type: none"> <li>• To which extent can the EQF become a catalyst for developments at sector level?</li> </ul>	<p>While SEMTA's role in qualifications hitherto has been very largely determined by national requirements, the growing internationalization of labour markets confirms that more attention should be paid in future to qualifications issues within the EU. SEMTA's work with Sector Strategy Groups on the <i>Sector Skills Agreement</i> re-emphasised the need to benchmark standards and qualifications on an international basis. The EQF is a timely trigger for this, and SEMTA would welcome opportunities to explore and develop this in collaboration with the Commission.</p>
<ul style="list-style-type: none"> <li>• How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?</li> </ul>	<p>The national vocational training and qualification arrangements in different Member States are known to be importantly different. Experience within enterprises with facilities in a number of Member States (e.g. Airbus) confirms that these differences can affect mobility (e.g. of apprentices). SEMTA believes that the contribution of the EQF should be evaluated in a targeted way in such problem areas.</p>
<ul style="list-style-type: none"> <li>• How can stakeholders at sector level be involved in supporting the implementation of the EQF</li> </ul>	<p>While SEMTA has been involved in various European projects in the past, it is not aware of directly equivalent bodies in different Member States (indeed few Member States have as elaborate an "institutional architecture" of skills bodies as the UK). SEMTA is interested in exploring collaboration opportunities with such bodies in relevant Member States.</p>
<ul style="list-style-type: none"> <li>• How can the link between sectors development and national qualifications be improved?</li> </ul>	<p>This is undoubtedly a challenge. The UK has made very considerable investments over recent years to attempt to ensure adequate comparability of competence-level definitions across sectors, and sectoral differences can make this difficult. Current Cross-sectoral work led by the Sector Skills Development Agency attempts to address some of the issues involved.</p>
<b>Mutual trust</b>	
<ul style="list-style-type: none"> <li>• 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?</li> </ul>	<p>This is evidently a crucial requirement for EQF to succeed. One of the important elements will be the need for stakeholders (and employers!) to perceive real benefits from the establishment of an agreed EQF, and this in turn will require clearer evidence and assessment of the current barriers to mobility at which the EQF is particularly targeted</p>
<ul style="list-style-type: none"> <li>• How can the EQF become a reference to improve the quality of all levels of lifelong learning?</li> </ul>	<p>This will require widespread buy-in around the Union to the proposition that it is possible to assess skills and competence (rather than just knowledge) directly and consistently in different contexts.</p>