

## Response to the EQF Consultation from the Scottish Qualifications Authority (SQA)

SQA welcomes the opportunity to respond to the proposal for a European Qualifications Framework. The framework has the potential to be a simple reference point for employers, individuals, and learning providers and make a real contribution to mobility within Europe.

The EQF both promotes the European dimension and protects subsidiarity, as national frameworks will remain as the operational framework for each member state. SQA supports strongly the idea that the EQF is a meta-framework to which national frameworks can relate, and that detailed information on qualifications belong within national frameworks, along with quality assurance arrangements.

Question	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>	<p>The main advantage of the EQF is its potential as a translation device for qualifications and the support it can give to: individuals, as they move across borders to take up wider opportunities to work and study; employers, as they recruit from a Europe-wide pool of skilled workers; education providers, as they recruit students from across Europe; and governments, as the EQF is a tool to assist the promotion of a flexible and mobile workforce across Europe.</p>
<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>	<p>A good communication strategy across all stakeholders and expert guidance and support.</p>
<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>	<p>Providing the level descriptors are clear and generic enough to allow national systems to align their own levels against it. However, we would make the following specific points:</p> <ul style="list-style-type: none"> <li>If the aim is to have an inclusive lifelong learning framework, the addition of an “entry” level is important. This entry level should not be separate from the rest of the framework and should have its own level descriptor.</li> </ul>

	<ul style="list-style-type: none"> <li>• It is also important that the EQF level descriptors are worded so that they have the potential to embrace all forms of learning: general (ie school), vocational and higher education as well as informal and non-formal learning.</li> <li>• There are references to credit ranges within the Appendices containing the EQF level descriptors in the consultation document. If a European credit transfer system is achieved, credit ranges are not appropriate in the context of lifelong learning.</li> </ul>
<ul style="list-style-type: none"> <li>• Do the level descriptors in Table 1 adequately capture learning outcomes and their progression levels?</li> </ul>	<p>SQA has conducted preliminary mapping of selected SQA qualifications to the EQF level descriptors via our national (SCQF) level descriptors and has the following comments to make:</p> <ul style="list-style-type: none"> <li>• The descriptors are vague at times and, perhaps because of the language used, are possibly not as suited to ‘scientific’ subjects as they are to more ‘creative’ subjects.</li> <li>• The social and ethical competence elements of the EQF level descriptors are missing from the qualifications SQA looked at and we would question the relevancy of these characteristics. The knowledge and understanding characteristics were easiest to align.</li> <li>• Approximation errors when using NQFs mean that there is a need to test individual qualifications against the EQF level descriptors.</li> </ul>
<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>	<p>Table 2 confuses the justification for aligning particular qualifications to an EQF level somewhat. In particular, 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.</p>

<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>	<p>In Scotland, we would conduct a mapping exercise between the levels in our NQF (the SCQF) to the EQF levels to get an initial alignment of SCQF and EQF levels. We would then test this alignment by checking a sample of individual qualifications at different levels directly against the EQF levels to see if our initial alignment exercise was robust. Thereafter we would not envisage matching individual qualifications against the EQF. All qualifications are levelled against our NQF, and then according to the general alignment principles agreed between SCQF and EQF, the levels already assigned to national qualifications could then be converted into European levels.</p> <p>Best practice methodologies would promote ‘mutual trust’ and a consistent approach to aligning frameworks to the EQF.</p>
<p><b>National Qualifications Frameworks</b></p>	
<ul style="list-style-type: none"> <li>• How can a National Qualifications Framework for lifelong learning be developed in your country – reflecting the principles of the EQF be established?</li> </ul>	<p>There is no single NQF for the UK. Scotland’s NQF, the SCQF has already been established according to the principles and outcomes-based approach of the EQF and this framework is operational.</p>
<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>	<p>The Scottish qualifications system for general (schools), vocational and higher education is already developed according to a learning outcomes approach.</p>
<p><b>Sectoral Qualifications</b></p>	
<ul style="list-style-type: none"> <li>• To which extent can the EQF become a catalyst for developments at sector level?</li> </ul>	<p>If the EQF is accepted as a vehicle for easing the path of worker mobility across Europe, then developments at sector level can be tied into this meta-framework which should provide “read across” both within and across sectors in Europe.</p>
<ul style="list-style-type: none"> <li>• How can the EQF be used to pursue a more systematic development of knowledge, skills and competencies at</li> </ul>	<p>As above - increasingly, individuals, employers, and providers require transparency in learning; it is easiest to express this in terms of outcomes.</p>

<p>sector level?</p>	<p>Learning outcomes make explicit the learning achieved at any given level of a framework. In addition, learning outcomes offer a way to describe and compare qualifications independently of their institutional context and the common language of the EQF should increase understanding between different systems and sectors.</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>This will only be achieved if the stakeholders at sector level view the EQF as workable and of benefit to their sector. If the rationale for the EQF is agreed and able to be implemented in a pragmatic and meaningful way, then involvement in that process will follow. Those authorities responsible for NQFs already have experience of engaging with sector stakeholders and can play a lead role in disseminating the alignment agreements of NQFs with the EQF to assist sectoral stakeholders to use the EQF in ways that benefit them.</p>
<ul style="list-style-type: none"> <li>• How can the link between the sectors development and national qualifications be improved?</li> </ul>	<p>A National Qualifications Framework that is capable of describing different types of learning for comparison purposes and credit transfer arrangements will encourage links between sectors developments and national qualifications. Learning outcomes and a credit-based Framework would provide the basis for this link.</p>
<p><b>Mutual Trust</b></p>	
<ul style="list-style-type: none"> <li>• 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?</li> </ul>	<p>Trust in the quality assurance arrangements that underpin National Qualifications Frameworks is essential if the EQF is to realise its potential. It will be important to draw on best practice in quality assurance from the EU and to learn from countries who have implemented a National Framework. A vehicle for harnessing and disseminating best practice is necessary to support further development of national quality assurance arrangements and national framework developments. These are pre-requisites for successful implementation of the EQF.</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>	National arrangements for quality assurance and national frameworks are paramount in improving quality. The EQF provides a common language of comparison across diverse systems.
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