

Scottish Social Services Council

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Comments to : [EQF@CEC.eu.int](mailto:EQF@CEC.eu.int)

The Scottish Social Services Council (SSSC) welcomes the opportunity to comment on the Commission of the European Countries consultation on "Towards a European Qualifications Framework for Lifelong Learning".

The SSSC is a non departmental public body set up by the Regulation of Care (Scotland) Act 2001. We are responsible for registering people who work in social services and regulating their education and training.

We were established to:

- set up registers of key groups of social service workers
- publish Codes of Practice for all social service workers and their employers
- regulate the training and education of the workforce
- promote education and training
- undertake the functions of the Sector Skills Council: Skills for Care and Development and this includes workforce development.

### **1. *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?**

Comments:

The principles underpinning the proposed European Qualifications Framework are supported by the Scottish Social Services Council. There is a need in the social services sector for a system which facilitates the recognition of equivalence of qualifications across European countries. There is also a need to enable the recognition of informal learning and the range of different types of formal learning. The EQF, depending on how it is implemented, could be one stage in developing such a system. The development of other sectoral agreements such as Bologna and Copenhagen need to continue in parallel.

There are considerable advantages to having such a single "meta framework". However this should not restrict the implementation and application of individual national or regional frameworks such as the Scottish Credit and Qualifications Framework (SCQF). The purpose of the EQF should be for enabling comparability.

There needs to be more clarity about the status of such a meta framework and whether it is and will remain voluntary or will it be regulatory.

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

Comments:

The EQF could be a positive enabling structure. Transparency and mutual understanding between countries would be beneficial to all involved in education and training and to individuals seeking recognition of their qualifications to enable movement across national boundaries. There needs to be systems which ensure credit accumulation and transfer, articulation between qualifications, recognition of workplace learning and the recognition of informal learning.

## **2. *The Reference levels and descriptors***

- **Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?**
- **Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?**

Comments:

The EQF cannot easily encompass the complexity of lifelong learning in all of the countries. However it can provide useful points of reference and comparison. The eight level structure is sufficient to provide an overarching framework and the level descriptors clearly capture outcomes at the different levels and progression from level to level.

The complexity of lifelong learning needs to be contained within the national frameworks. The SCQF has provided a robust model and can provide benchmarks for the development of other frameworks. The 12 level structure of the SCQF has shown itself to cover a sufficient range of the complexity of lifelong learning, to be sufficiently flexible and to permit the detailed comparison of knowledge and skills at all levels from Access level 1 to PhD at level 12.

- **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?**

Comments:

The supporting and indicative information adds a contextual background within which to understand the framework. However it can not reflect the variety of learning possible and therefore has the potential to restrict the application of the framework. It is a very large and complex task to provide adequate supporting and indicative information which would meet the requirements of all countries.

The level descriptors of the SCQF can be aligned to the proposed EQF. The EQF can not and should not replace individual countries' frameworks.

### **3. National Qualifications Frameworks**

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

Comments:

The SCQF provides a framework for lifelong learning. The SCQF reflects the principles and outcome approach of the EQF. It is a 12 level framework for credit and qualifications based on the outcomes of learning and the volume of learning. Its aims and objectives include: reliable and credible arrangements for credit rating and levelling; robust credit transfer arrangements; recognition of informal and workbased learning, and articulation between qualifications.

### **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 SCQF?**
- **How can the link between sectors development and national qualifications be improved?**

Comments:

The EQF could be a catalyst for developments and agreements at sector level which are being progressed currently. Such developments would benefit from clarification within the European context. It is important that any European Framework is consistent with national aspirations for flexibility, progression and the omission of dead ends for learners. It is essential that processes are developed that will enable the recognition of qualifications, the transferability of skills and workforce mobility throughout the UK and the rest of Europe.

The social services workforce in Scotland is a regulated profession where employees must be qualified in order to be registered. A qualifications framework must function to support this. It is also crucial for the social services sector that the workforce should have flexibility and mobility. Comparisons and agreements on mutual recognition across countries

could be facilitated. However, the framework should not contribute to limitations or restrictions on the sector.

## **5. Mutual Trust**

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

Comments:

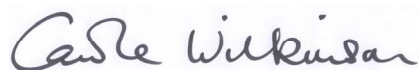
A qualifications framework clarifies and makes explicit different levels of learning. As such it provides the foundation for mutual trust. However, systems of quality assurance are required to promote confidence. It is crucial to promote and enable mutual trust and confidence to support such a voluntary framework.

## **6. Other comments on the EQF proposal**

Comments:

The proposals regarding qualifications do not make apparent the existence of different education and qualifications systems within the UK countries. This is further complicated by separate legislation for Scotland and education policy being devolved.

There are considerable resource implications for the development and implementation of a qualifications framework. This affects countries which have yet to develop a qualifications framework as well as those which have done so already. There are also considerable resource implications in developing systems for maintenance and further developments both within and between countries.



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