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Towards a European Qualifications Framework for Lifelong Learning

Consultation comments by the European Council for Steiner Waldorf Education (ECSWE)

The European Council for Steiner Waldorf Education (ECSWE) strongly supports the development of a European Qualifications Framework (EQF) which takes into account "that institutions and associations outside the context of national qualification policies claim the right to authorise learning outcomes" (p. 11 of EQF consultation paper). We are currently looking for partners to work towards the goal of offering a European qualification through an individualised assessment that includes the official validation of non-formal learning experiences, working in particular with portfolio documentation, but using the latter also in the context of secondary education.

On the one hand, it seems that end of school qualifications will remain in the hands of national educational authorities for the foreseeable future. On the other hand, even these instances might be interested in the added value of more universal qualifications, based on individual and integrated assessment that can qualify for entrance into tertiary education. In a time when a strong tendency can be observed leading towards standardised qualifications through centralised examinations, it should be noted that these generally do not promote the sense of initiative and creativity that develops the spirit of entrepreneurship. A rich diversity of outcome oriented qualifications could be envisaged against the backdrop of common reference points at a European level, as formulated by a EQF, including a set of common principles and procedures in quality assurance and validation.

The competences that play a role in a EQF should not be limited to solely cognitive competences. Entrepreneurship can only flourish when key personal and social competences are also developed. This aspect could be developed further within the remit of the EQF.

The EQF comes out of the work with lifelong learning. The lowest three of the eight levels seem, however, to apply also to the secondary level of education. We have studied the EQF consultation paper in detail and have not found that the proposed eight levels are only to be restricted to vocational training. Indeed, lifelong learning does not begin with vocational training. We are interested in opening schools and the learning that takes place in secondary education to the concepts and assessment methods of lifelong learning. It might be helpful to explicitly mention this dimension of a EQF, which is still largely seen as restricted to the context of vocational training.

The schools sector which the ECSWE represents is very interested in being inspired by the EQF in the above mentioned initiative in order to develop a new qualification based on individualised and integrated assessment together with other innovative

European partners. A EQF could act as a central pillar in such a development. We hope that the development of National Qualification Frameworks will not aim to "stake out the territory" against justified sectoral initiatives which are interested and able to develop innovative qualifications in their own right, as the right to authorise learning outcomes outside the context of national qualification policies has indeed been questioned in some EU countries. The call to set up "a single national framework of qualifications" might well be misunderstood to disallow institutions from outside the context of national educational policies to exercise the right to authorise learning outcomes. This would disenable Europe's greatest resource - civil society - in fully engaging itself in the process and impoverish innovation in Europe.

We are aware that this is a sensitive issue and that policies proposed by national governments carry a lot of weight in the open method of co-ordination underlying the Lisbon process. But just as the various National Qualification Frameworks reflect the cultural and educational diversity of Europe, so the development of innovative assessments developed outside the context of national qualification policies and which duly undergo adequate quality assurance and validation would reflect cultural and educational diversity within the individual member states. A EQF could be of great significance as a European backdrop not just for "translating" existing qualifications across boundaries, but also in aiding new innovative developments and enabling these to be embedded into an accepted European context. This would help the ongoing process of empowering European civil society as such and contribute to furthering European citizenship right down into secondary education.

This process would be aided by encouraging cross-boundary independent regulatory agencies in the field of qualifications, which would need to cooperate with existing national agencies. The accreditation of independent competent bodies to determine that an individual has reached a particular qualification is, so far, almost non-existent in secondary education in Europe. This also puts educational philosophies that stress European approaches to education at a disadvantage, since they, by their nature, transcend national approaches. It also tends to disadvantage educational approaches which stress developing less measurable competences like entrepreneurship, team work, emotional literacy and "thinking outside the box". The aim to reach more students achieving secondary qualifications is not furthered by limiting such qualifications to successful alumni of secondary schools and to those who pass a centralised examination based on a national curriculum. More diversity is called for in this realm and, with the help of a EQF, Europe could become a truly innovative influence in this area.

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About ECSWE: Steiner Waldorf Education has as its primary aim to develop the spirit of entrepreneurship in each individual. The European Council for Steiner Waldorf Education (ECSWE) comprises 22 national Waldorf Associations, representing 630 schools in Europe. Some of these schools offer vocational training. There are numerous (added value) teacher training centres in most of the countries with Steiner Waldorf schools. Steiner Waldorf schools have practised a European approach to education since they were founded in 1919, with, for instance, two foreign languages taught from class one since that time. This has, at times, put their aims at odds with more rigid national educational systems which have found it difficult to accommodate themselves to a complementary form of education.