

University of Surrey

Response to the EU Consultation: “Towards a European Qualifications Framework for Lifelong Learning”

General remarks

The University of Surrey welcomes the adoption of learning outcomes as the central measure for describing qualifications and notes that this is in line with UK practice. It also welcomes the voluntary nature of the Framework, although is concerned that such a scheme might become compulsory at a later stage. Any such move would be retrograde and unacceptable. Responsibility is clearly designated at the national level and it is essential that this remains the case under any over-arching European framework. The University also welcomes the inclusion of competences and skills alongside knowledge in the descriptors for the levels.

The rationale for the EQF

- *Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?*
- *What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?*

The University supports the establishment of a framework so that national systems can be made more transparent for all stakeholders and accepts the idea of levels. Where levels are established there is also a need to ascribe credits against these.

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?*
- *What should be the content and role of the ‘supporting and indicative information’ on education, training and learning structures and input (table 2)?*
- *How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?*

The eight levels proposed extend beyond the range of levels employed by UK higher education. The mapping of individual qualifications with reference to the descriptors will require proper consideration but it is felt that such an exercise could be undertaken. Use of the Dublin descriptors provides a direct link with work that has been undertaken within the Bologna Process to identify common terms and outputs for higher education. The current UK system for higher education, as specified by the Quality Assurance Agency, requires levels 0, 1, 2, 3, M and D to be matched with the descriptors. In mapping the UK awards the University notes that level 8 and level 7 provide a good match with doctoral and master awards, and that the descriptors would enable undergraduate qualifications to be aligned to the EQF.

The need for a credit system is acknowledged, but this needs to be defined and realistic and there is concern that ECTS might not be suitable given the current existence of such widely varying hours. It is not clear what is included in the definition of hours but the ECTS Guidelines on the Europa website allocate 25-30 hours per credit. There is, in our view, a need to determine an overall volume of credit for an award and to ascribe learning outcomes so that appropriate positioning of qualifications within the framework and, thereby comparison, can be made. The above figures do not align with the UK definitions. These are already based on notional student load of 40 hours per week. It is not considered reasonable to increase this significantly since students are also committing time to part-time jobs and to extra-curricular activities. It would be very difficult to extend the number of hour per week and there are costs associated with any extension to the teaching period that would be unacceptable.

National Qualifications Frameworks

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

The UK model is already based on learning outcomes and considerable work has been done in recent years to develop this approach. The EQF will need to have structures that are homologous with national structures. Most UK institutions are using the NICAT or SEEC criteria and the Burgess Group's work on National Credit Arrangements for Use of Academic Credit in Higher Education in England has to be kept in mind. It is important that these national developments are not be impeded by a European initiative, although alignment between them is essential for the EQF to work effectively for stakeholders. The EQF must also be compatible with the Bologna developments relating to higher education.

Clarification is needed concerning the role of the international experts in the certification process that will align the national qualifications to the EQF. Who will these be? How will they be selected? What will be their role? To whom will they be accountable?

Sectoral qualifications

- *To which 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 EQF?*
- *How can the link between sectors development and national qualifications be improved?*

The University is concerned by the tone of some questions that suggest the EQF would be used to push forward change. This may be the case in countries that have no existing system, but must allow for any existing national developments to be implemented.

A specific concern is raised in relation to the definition of social competences in the sectoral descriptors and the need for these to take account of the needs of some disabled groups. Individuals might demonstrate full achievement of the learning outcomes but be unable to fulfil the social competences at a given level. This will need to be explored in more detail with representatives of these groups to ensure that implementation is inclusive.

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 learning?*

In relation to the questions in the consultation on Mutual Trust the University wishes to emphasise that fundamental principles differentiate the levels and that quality assurance mechanisms are essential in underpinning this. Institutions must, nonetheless, retain the right to determine their own admissions. Placing an award at a particular level should not carry an automatic right of entry to another award.

The emphasis on quality is important and the University recognises the progress that has been made within the Bologna reforms in defining common European QA standards and guidelines in higher education and believes that this is essential for the proper implementation of a framework.

The tools will be a valuable adjunct to judgements about applicants' qualifications, but the comparability issues surrounding ECTS between national systems need to be resolved.

Summary

The University of Surrey welcomes the proposals provided they remain over-arching in nature and allow for the development of structures at the national level that meet national needs. The establishment of a European meta-framework will provide a valuable means of aligning national qualifications between

Member States. Further consideration is needed concerning competences with regard to students with disabilities and the role of international experts in guiding the matching process should be clarified.

Annette Strauss
European Officer
e-mail: a.strauss@surrey.ac.uk

On behalf of the University of Surrey