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Swedish position concerning the European Commission's proposal for a European qualifications framework for lifelong learning (EQF)

Summary position

Sweden considers that the overall purpose and objectives of the qualifications framework are good, i.e. to establish a tool for increased comparability that can thereby increase international mobility in the European area of education and the labour market. It is, however, hard to know how far the proposal will achieve this purpose, as it is hard at this stage to overview its consequences, implementation, potential and effects on education and the labour market.

It is of the utmost importance that the proposal is tested, in certain pilot sectors and/or in a range of countries. A revision should then be made on the basis of the views that emerge through the tests in order to ensure that the European qualifications framework for lifelong learning (EQF) really can function as intended.

The status of the qualifications framework as an informal instrument ought to be pointed out in all contexts. The qualifications framework must not steer national educational and qualification systems in any way. The EQF should be seen as a tool to promote mobility in Europe, together with Europass and Ploteus, for example,

We appreciate the fact that the proposal is based on learning outcomes. However, references are also needed to the formal education system, in the form of the supplementary table "national supporting information" that is included in the consultation document and that should be prepared on the basis of the different national conditions, the preparation of this table should therefore be a national matter.

In our view it is very positive that the proposal covers all forms of learning and also contains a validation perspective. The validation perspective is also very important for people coming to the EU to study and work. The continued discussion should highlight how the tool will function for third-country citizens. In the Bologna Process ministers of education from 45

countries have agreed on a qualification framework within the European Higher Education Area based on learning outcomes. It is of the utmost importance that the Commission continues to consult with the Bologna follow-up group to ensure that the EQF and the Bologna Process framework are mutually consistent so that work is not done on two competing systems.

We consider the proposed eight reference levels relevant and appropriate at European level.

The proposal contains descriptors in three areas: knowledge, skills and personal and professional competences. We are doubtful about the current design of the third category. Certain descriptors in this area may be worth retaining, but we are doubtful about included this area as a whole in EQF. This is mainly because we see many of the descriptors as being related to personal qualities not obviously achieved by progression through the education system. In addition, these qualities are hard to assess and to measure. In the event that parts of the area are retained, a substantial revision should be undertaken.

To have as many employers as possible use the system, it must be designed in an unbureaucratic way suited to its purpose, and this can also take place within the framework of the different sectors.

The question of a national framework has been raised as a result of this consultation and a discussion will be started in the spring. It is far too early to give any opinion about the future conclusions on a possible Swedish framework. All the relevant parties at national level will be invited to take part in coming discussions.

1. General comments

The purpose of the proposed European qualifications framework is commendable. Basically Sweden views this as a good initiative to achieve greater transparency, thereby facilitating increased mobility across borders and also, properly used, between occupational areas. It is, however hard at this early stage to make any pronouncement on the impacts of the proposal and its effects on education and the labour market, as it is hard to overview how the framework will be designed and used in practice. Moreover, it is not yet clear what functions will be filled by the European Credit Transfer System in Vocational Education and Training (ECVET) and what relation the Credit Transfer System will have to an EQF. We welcome the intentions of the EQF proposal but consider that it is hard to overview its use in practice, not least from the perspective of the individual citizen. The framework should be tried out in concrete situations and a revision should be undertaken to take account of the results of the pilots before the framework is finally adopted.

1.1. Legal status

It is important in all contexts to point out that a European framework will not have the legal status of a formal instrument, which would risk having a negative effect on future developments. An EQF should instead be an aid for understanding and comparison that Member States can use voluntarily. When the framework is viewed as a voluntary instrument, we assess that it could help to facilitate and make use of the outcomes of lifelong learning by linking up different forms of education, training and learning.

1.2. All kinds of learning

Sweden is positive to the inclusion in an EQF of all kinds of learning and not just formal education. A validation perspective is essential to also accommodate informal and non-formal learning, and the proposal also contains such a perspective. The validation perspective is also important in order to open the framework for use by people outside of the EU area. It is important in various contexts in the continued process to take account of possible use outside the European countries. In Sweden the validation perspective is important. The possibility of validation means that knowledge can be given a documented value, no matter where and when it was developed and acquired. It is therefore essential that knowledge and competence gained outside the formal education system, such as through experience from working life, are respected and included. This is a starting point for ongoing developments in the area of adult learning and higher education in Sweden. The validation perspective is also expressed in our admission regulations for higher education, where work experience can be a ground for both eligibility and selection.

1.3. Link to the Bologna Process

It is important to have a well-developed shared perspective between work within a framework for qualifications for lifelong learning and the qualification framework adopted in the context of the Bologna Process. The higher education world ought not to have to feel that it is working with these frameworks as two separate systems and ought to be able to feel that they both reflect the same objectives and requirements. It is reasonable for the two systems not to be identical, as an EQF has to include all kinds of learning, but they should continue to develop in a shared perspective and therefore be in harmony with one another. It is important that the countries taking part in the Bologna Process but not in EQF are given the opportunity to take part in future work. We therefore consider that the Commission should consult with the Bologna follow-up group in future work on an EQF.

2. Concrete views on the proposal

2.1. Learning outcomes

Sweden considers that it is positive that the framework builds on the outcome of all learning and not just on the scope of formal education. This is also necessary to enable full account to be taken of informal and non-formal learning. As a complement, a reference should be made to the length of formal education programmes. This need is met by the table giving complementary information that is included in the proposal. In this table the EQF can be clarified in relation to the national level, for instance, in terms of the activities within formal systems. In this context it is important to carefully analyse the effects of a future ECVET in vocational education and training and how this will impact on the use and design of an EQF as well as what effects the two systems may have together.

2.2. Number of levels

Sweden considers the eight reference levels in the proposed European qualifications framework relevant and appropriate at European level. It is, however, too early to state an opinion on consistency with a possible national qualifications framework. See section 3 for further discussion.

2.3. Supplementary national information

Table 2 is intended to provide a national adaptation to and clarification of, for example, formal systems and should therefore provide good assistance in giving an idea of what levels in the formal education system or in working life that the various levels in the framework might be related to. See also point 2.1.

2.4. Personal and professional competences

Sweden considers that the final framework should focus on the areas of knowledge and skills. Personal and professional competences are also an important area and the competences referred to here are made visible as educational objectives in parts of the Swedish education system. However, it can be debated whether these levels really have a genuine link to education at different levels. With the current formulation of the descriptions we doubt whether this area should be included in the framework as it has more to do with personal qualities that can be developed through life experience, but that are not obviously a progression that follows from learning or an outcome of an educational level. Limiting social and ethnic assessments to the higher levels of the system is particularly problematic. Our view is that in many cases the competences described are completely independent of formal educational level. The qualities described in the area of personal and professional competences are important for many employers and the sectors that assess this area as particularly important can elaborate it within their own sector-specific frameworks. Nevertheless some of the components included in this area can be included in the framework. This applies, for instance, to those that deal

with communication skills and that correspond to the wording of the framework adopted in the Bologna Process. However, we see this area as problematic as a whole, and to the extent that competences in this category are to form part of an EQF, extensive revisions should be undertaken.

2.5. User friendliness

It is important that an EQF is designed to be user-friendly for individuals, employers and other relevant actors. The aim should be to achieve an unbureaucratic system suited to its purpose. On the basis of the descriptions in the document, however, it is difficult to foresee how the tool will be designed in practice. In this context the national presentation of supplementary information (table 2) will be very important.

2.6. Development opportunities

The establishment of an EQF and a possible national framework could contribute to increased mobility in the labour market because the common documents and reference levels can make it easier for individuals to obtain a correct assessment of their competence. By themselves level determination, recognition and documentation can have the effect of stimulating participation in further education and of contributing in the long term to both personal development and enhanced professional competence. To make this possible a national framework system has to be developed and internal professional development work in sectors and companies has to be related to the national system. Some sectors already have their own educational and certification systems, others have none at all. Here we see an opportunity for an EQF to act as a catalyst for spread between sectors by stimulating demand for and, in time, access to further education and by clarifying career paths in the sectors where they are not currently so clearly seen. Using documentation to make learning visible can stimulate further action. Developing and linking sectoral competence systems to a national system, with the involvement of all the relevant actors in the development work, must, however, be seen as a relatively long-term process.

2.7. Mutual trust

Mutual trust in each other's education systems is necessary to achieve the intentions of an EQF and to promote an understanding for the competence gained in education systems other than one's own. In the Swedish labour market, which is relatively unregulated, this is particularly important as it is the individual employer who assesses the applicants' competence and therefore their qualifications at the time of recruitment. Knowledge about and trust in other countries' quality assurance of education and qualifications is crucial. It is therefore important to supplement development of an EQF with European cooperation on quality issues in education systems.

3. National framework

It is clear from the Commission proposal that it is seen as desirable for the European framework to be linked to national frameworks. In cases where there are no national networks the Commission encourages work at national level to set up frameworks that, like an EQF, are based on learning outcomes. However, it is not thought that the national frameworks need to follow any particular format.

The objectives and tasks formulated in the working document correspond well to the needs for general descriptions that can promote mobility in both the area of education and the labour market and in working life. However, as indicated in the document, the expected learning outcomes will have to be operationalised and linked to the special conditions in each country. In Sweden there is at present no national framework for qualifications, but the question has been raised as a result of the EQF consultation process and will be discussed in the spring of 2006. It is too early to say what a coming discussion on the possible establishment of a national framework in Sweden and on the possible design of such a framework will lead to. There are several different options concerning the design of a possible national framework, for example whether sector's own certificates, occupational qualifications, etc., are to be included or whether they are to be linked to the framework in a freer way or whether possible sector frameworks may be considered. The discussions that will be held will involve all stakeholders in the area.

It should be those who are responsible for organising an education or training programme or that establish competence and qualification requirements who are also responsible for deciding what level the education or qualification should correspond to in an EQF. Quality control and level determination should take place at national level within the framework of each Member State's national quality control system.

Sweden's education system is not currently described in terms of a national framework and this means that there is no ready-made framework to compare an EQF with. If it is used properly we see great potential in an EQF for the individual the employer and other actors. There is, however, no guarantee for successful implementation, so success probably depends on various choices made at national and European level when an EQF is to begin being used.

4. Pilot activities

If the framework is to contribute in a positive way to developments as intended, it needs to be used on a broad front in Member States. Broad use requires high credibility and before it is possible to make a more definitive assessment of the actual value and credibility of the framework, it must be tried out in a more concrete way in various pilot sectors/industries and/or in a range of countries. The proposal as it is today has not been processed sufficiently with the broad support among stakeholders that is needed to achieve a high level of use. Sweden therefore considers that a number of pilot projects should start up and that a decision already taken in 2006 should contain possibilities of revising levels and descriptors, etc. based on the experience gained in the pilot projects.

5. Further work

As mentioned above, the new proposal to be presented to the Council and Parliament during the spring should be given a thorough trial. Funds have been set aside within the framework of Leonardo da Vinci in 2006 and the intention should be to set aside funds in the same way within the framework of the integrated programme that will replace the current education programme. The decision on the framework should be flexible in the sense that it should be possible to alter the details of the framework based on experience gained during the test period.

The Commission should continue to be responsible for the pilot activity and how the results of this activity influence the design of the framework in the revision that should be undertaken after the completion of the pilot activities.