

UK RESPONSE ON A PROPOSED EUROPEAN QUALIFICATIONS FRAMEWORK

Introduction

The Department for Education and Skills, in the United Kingdom, launched a UK wide consultation on the Commission Staff Working Paper on the European Qualifications Framework (EQF) on 2 September 2005. 153 stakeholders were invited to respond to the consultation directly, and the devolved education administrations in Scotland, Wales and Northern Ireland also alerted their stakeholders to the consultation. The consultation invited interested parties to provide answers to the questions raised in the Commission's document. It also invited respondents to raise any other issues about a European Qualifications Framework.

The responses received were from a wide range of interested organisations. They included competent authorities, whose occupations are covered by the provisions of the mutual recognition Directives; awarding/examination bodies; sector skills organisations; professional and business organisations; trade unions; higher education institutions and their representatives and the devolved education administrations.

This response represents the views of the UK Government, taking account of the responses received.

Summary

The UK welcomes the proposal for an European Qualifications Framework. We believe that it can help improve mobility of individuals across borders by allowing qualifications across different Member States to be related to one another. This can make a significant contribution to the Lisbon process, by helping labour markets function more effectively, as well as allowing individuals to achieve personal fulfilment. We particularly support the outcome-based approach, and moves towards the recognition of non-formal and informal learning, which will allow the EQF to be used for a wide range of different forms of learning.

However, we believe that there are some key issues which need to be addressed to make the EQF a success. These are:

- The EQF needs to be consistent with the existing Framework for Qualifications in the European Higher Education Area (the "Bologna Framework") and the linkages between the two need to be clearly and simply articulated.
- Links between lower levels of the EQF and qualifications for learners with low skill levels should be clarified further.
- The process for self-certification of EQF levels should be underpinned by a voluntary peer review process to improve consistency and build mutual trust.
- The level descriptors should be refined after consultation with stakeholders and an extensive trial phase. This should involve all stakeholders, and

should aim to simplify and reduce the level of detail.

- The “Supporting and indicative information” in table 2 should not be part of the consultation document. This level of detail should be the responsibility of Member States, to reflect their national contexts.

UK RESPONSE TO SPECIFIC CONSULTATION QUESTIONS

The rationale of an EQF

1. Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?

The UK supports the objectives set out in the consultation document, which recognise the EQF as a translation device which will allow different national frameworks to be related to one another. We believe that this has the potential to help increase the mobility of individuals across Europe, as well as helping develop institutional and sectoral partnerships across national boundaries. This could help the internal market work more effectively, and hence make a significant contribution towards achievement of the Lisbon goals. It could also help individuals achieve personal fulfilment by allowing them to work and study more easily in different Member States. We are particularly pleased with the focus on learning outcomes, which is consistent with the development of qualification frameworks across the UK, and should help move towards a system where individuals are recognised for what they can do, rather than how long they have studied.

However, it is essential that the EQF remains a meta-framework, and does not aim to replace or supplant national frameworks. It is also important that it recognises the frameworks that are already in place and, in particular that it is totally consistent with the Framework for Qualifications in the European Higher Education Area (the “Bologna framework”), to avoid any confusion that might arise if stakeholders feel that they have two different frameworks to relate to. Some stakeholders have expressed concern over the mapping of the EHEA Dublin descriptors to the EQF descriptors specified in the consultation paper. The UK believes that the HE sector should be closely involved in a pilot and testing phase to ensure that the terminology and descriptors in the two frameworks are compatible with one another.

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

In order to make the EQF work, it needs to be described in clear and simple terms in order to be accessible to all key stakeholders. It needs to complement and articulate clearly to other existing frameworks, such as the EHEA framework developed under the Bologna Process.

A number of respondents to our consultation felt that the overall purpose of the EQF, as well as its limitations could be stated more clearly, and a few misunderstood the nature of the EQF as an attempt to harmonise or regulate. Clear communication of the purpose and objectives of the EQF is essential to build support for it amongst stakeholders.

Furthermore, it is essential that the framework is not excessively detailed, otherwise it will become complex and inaccessible. Detail should be left to

those implementing national frameworks – with the EQF merely providing common reference points. A number of respondents were concerned by the level of detail in the framework, and the UK would support moves to further refine and simplify the descriptors.

The EQF also needs the support of employers, awarding bodies, and professional bodies in order for it to encompass the full spectrum of lifelong learning. In order to achieve this, extensive consultation on the detail of the EQF needs to be undertaken. This should be done through a piloting and test phase that will involve stakeholders from each of the key sectors.

An integrated credit transfer system would be useful in the long term to improve the ability of individuals to acquire qualifications within different learning systems in different countries. This should be linked to learning outcomes, to be consistent with the principle of the EQF. However, this will need to be consistent with existing credit transfer systems, and in particular, the developments in Higher Education under the Bologna process.

3. What should be the content and role of the ‘supporting and indicative information’ on education, training and learning structures and input (table 2)?

The UK believes that the “supporting and indicative information” on education, training and learning structures and input given in table 2 should not be part of the EQF proposal. This is because it contains input-based measures, which sometimes contradict the descriptors given in table 1, and can therefore be confusing. Instead, the content in table 2 should be the responsibility of each Member State to complete during the implementation phase of the EQF, to indicate how their national and sectoral qualifications fit into the EQF.

This view was echoed by our stakeholders, many of whom felt that table 2 as drafted was confusing to them, and undermined the outcome-based focus of table 1. However, a number felt that some sort of information on how the outcomes in table 1 related to the particular qualifications frameworks in the UK would be helpful.

The reference levels and descriptors

4. 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?

The UK supports the 8 level reference structure as an effective means of capturing a wide range of lifelong learning approaches. We particularly support the outcome-based approach of the EQF, which is consistent with the developments within qualification frameworks across the UK, and are pleased that non-formal and informal learning will be captured by these descriptors.

However, we have some concerns about the lack of clarity in the present framework over how lower levels of qualifications, such as those for learners

with low skill levels would be accommodated. This could weaken progression opportunities across Europe for vulnerable learners, which is an important issue given the concern with EU-wide progress against the agreed social inclusion benchmarks. We would suggest that the content of the lower levels of the EQF is reviewed to ensure that the lowest levels of qualifications and learning are recognised within them.

We are also concerned about the level of complexity within some of the descriptors. Although there is a need to ensure that the descriptors contain adequate detail to ensure that they are not too general for practical purposes, we are concerned that in some areas, the level of detail is approaching that of a national framework.

As mentioned in section 2 above, the UK believes that it is essential for the actual descriptors to be tested out in practice, with a wide range of stakeholders and a number of different qualification systems. There is no mention of a test and trial period for the actual descriptors within the consultation document, and we strongly believe that there should be one.

5. How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?

There are three different qualification frameworks in existence in the different parts of the UK. Both national and sectoral qualifications in the UK will be matched to the EQF through these national qualifications frameworks.

The involvement of Sector Skills Councils will be important for matching sectoral qualifications to the EQF in the UK. More details of this are given in section 10 below.

National Qualifications Frameworks

6. How can a national qualification framework for lifelong learning – reflecting the principles of the EQF- be developed in your country?

As mentioned above, the UK already has three different qualifications frameworks in each of the different parts of the UK. Northern Ireland, Wales and England have a 3-country framework, known as the National Qualifications Framework (NQF), which has 9 levels, including an entry level. Within this, Wales has its own Credit and Qualification Framework for Wales (CQFW). Scotland has a separate own credit and qualifications framework, the Scottish Credit and Qualifications Framework (SCQF), based on 12 levels, which includes access levels.

Currently, England, Wales and Northern Ireland are discussing the development of the current NQF into a more inclusive unit-based qualifications framework, underpinned by a system of credit accumulation and transfer across the three countries. Furthermore, joint working with Ireland has led to a publication of a diagram showing the equivalence between qualifications in England, Wales, Scotland, Northern Ireland and Ireland.

The UK believes that its experience of working with its different qualifications frameworks would provide a useful model that the Commission may wish to consider when implementing the EQF.

7. How, and within what timescale, can your national qualifications systems be developed towards a learning outcomes approach?

National qualifications systems in the UK already adopt a learning outcomes approach.

Sectoral qualifications

8. To which extent can the EQF become a catalyst for developments at sector level?

The EQF can become a catalyst for developments at sector level, by allowing qualifications developed by sectors in the UK to be related to their equivalents in other European countries. Employer and business organisations that responded to our consultation were optimistic that this could help support efforts to reduce skill and labour shortages by encouraging mobility within sectors across Europe.

9. How can the EQF be used to pursue a more systematic development of knowledge, skills and competencies at sector level?

Systematic development of knowledge, skills and competencies at sector level should first occur through national qualifications frameworks. The EQF can then be used to translate these developments to similar ones across Europe. Many sectors already collaborate on an EU-wide basis and the EQF can help stimulate collaboration on skill development in similar sectors across different Member States. However, as a meta-framework, it should not be used to bypass national frameworks.

10. How can stakeholders at sector level be involved in supporting the implementation of the EQF? How can the link between sector skills development and national qualifications be improved?

Stakeholders at sector level can only be involved in supporting the EQF implementation if the content of the EQF is relevant to them. This means that it should support recognition of workplace as well as academic learning, and sectoral stakeholders should be involved in the test phase of the EQF.

To improve the link between sector skills development and national qualifications, it is important for national qualifications bodies to work with sector organisations to ensure that the development of qualifications fits within the national frameworks. In particular, it is essential that the work on defining knowledge, skills and competencies at a sectoral level is demand-led. Otherwise, the development of sectoral qualifications may not necessarily be

relevant to the needs of the employers, which will reduce their usefulness.

Our mechanism for achieving this in the UK is through the involvement of Sector Skills Councils. These are employer-led bodies that are responsible for identifying and defining current and future skill needs within their sector. Our national qualifications bodies are working with the Sector Skills Councils to understand their learning and training needs. The aim is to deliver customised qualifications that help drive the acquisition of skills in a sector, and are linked to the national qualifications frameworks to provide clear pathways for progression.

Mutual Trust

11. How can the EQF contribute to the development of mutual trust (e.g. based on common principles for quality assurance) between stakeholders involved in lifelong learning - at European, national, sectoral and local levels?

The UK believes that mutual trust cannot solely be achieved through a consistent set of level descriptors, but also requires trust in quality assurance systems in different countries. In particular, we believe that the self-certification of levels to the national qualifications frameworks in Member States will need to be strengthened through a form of voluntary peer review, to build trust and ensure that consistent procedures are being used.

It is also essential that the EQF does not undermine existing arrangements for quality assurance under the Bologna process. This requires consistent terminology, and compatible procedures.

12. How can the EQF become a reference to improve the quality of all levels of lifelong learning?

The EQF can improve the quality of lifelong learning in the EU by facilitating co-operation and collaboration between providers in different countries, thereby raising standards. It can also stimulate the development of national qualifications frameworks that are outcome based, and recognise a wide range of learning. However, it is the national qualifications frameworks themselves, and not the EQF that should be the main drivers of improvement of quality in lifelong learning. The EQF therefore needs to ensure that it remains a translation device, complementing other frameworks that are already in place, and does not seek to supplant or replace national frameworks.