

EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING

UCET Response to DFES/EC Consultation Paper

Question 1a

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

Yes.

The consultation paper sets out with commendable clarity the educational *desiderata* that the EQF seeks to fulfil, as well as its principal functions. The benefits of the EQF are considerable, not just in facilitating the transferability of qualifications and the increased mobility of citizens across the EU, but also in stimulating member states to establish for themselves a national framework within which all members of their own communities can pursue the extension of their skills and understandings throughout their lives. It is particularly gratifying that the proposed EQF avoids the *dirigiste* imposition of a framework that all must follow, but rather, in keeping with the voluntary principle, offers a framework against which member states can benchmark their own provision.

Question 1b

What is needed to make the EQF work in practical terms?

It is essential that the framework is simplified if it is not to be interpreted as being divorced from the realities of ordinary educational experience. We appreciate the ambitiousness of what is being attempted, as well as its complexity. We also commend the attempt by the compilers of the document to present the proposed model in different ways in order to increase its intelligibility, and to enable member states to interpret the proposal in ways that will accord with their own provision. However, the cardinal statement, the specification of eight subtly differentiated levels of learning outcomes, is likely to constitute a severe challenge to those who provide educational opportunities and to over-elaborate to those who are supposed to benefit from them.

Question 2a

Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?

If there were any doubts about the complexity of provision these will have been obliterated by the sight of the proposed 8-level structure. What is required is a model that simplifies rather complicates. The wording of the 8 levels of outcome marks some very sophisticated distinctions that education providers will be tested to reflect in their provision.

Question 2b

Do the level descriptors in table 1 of the consultation document adequately capture learning outcomes and their progression in levels?

The descriptors certainly differentiate between levels at the extreme ends of the progression, so that the outcomes at level 8 are significantly more demanding than those at level 1. However, the differentiations between the different levels are over-subtle. There is in our view a need for fewer categories or for a less complex basis for differentiation than learning outcomes.

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?

We found table 2 to be altogether more illuminating and we suggest that consideration might be given to the explication of levels by an elaboration of table 2.

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

We think that it should prove relatively straightforward to match existing national provision against levels 5 to 8, but suggest that it may prove difficult to conduct a matching exercise against the first four levels as presently set out.

Question 3

How can a National Qualification Framework for lifelong learning – reflecting the principles of the EQF - be developed in your region?

There is no objection in principle to the idea of an EQF. The UK has established a national qualifications framework. Work will be required to check the degree of matching that exists between the national framework and the EQF. The specification of the EQF in terms of learning outcomes will make this task a difficult one.

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

Again, there is no fundamental objection to a learning outcomes approach, since that is a feature of the existing national qualifications framework. The difficulty will lie in establishing congruence with the EQF and decoding the gradations of competence on which the EQF is based.

Question 4

To what extent can the EQF become a catalyst for developments at sector level?

It is our impression that sectoral qualifications are less well developed in the UK than those that have been developed by the educational bodies. In principle, the EQF ought to provide an impetus for sectoral qualifications, ideally in collaboration with educational bodies, especially in view of the emphasis in the EQF proposal attributed to the accreditation of learning in work and other informal contexts.

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

The EQF provides a model of how knowledge, skills and competences can be systematised. Those who have a strong interest in professional mobility have an incentive to benchmark their learning opportunities against the EQF.

How can stakeholders at sector level be involved in supporting the implementation of the EQF

We suggest that the EQF might be adopted as a pilot in a limited number of sectors in order to demonstrate its feasibility. A successful pilot would encourage wider involvement.

How can the link between sectors development and national qualifications be improved?

One of the obvious ways of improving links is to seek to ensure that sectoral and national qualifications are part of the same framework.

Question 5

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.

The consultation document is right to insist that the EQF must be based on mutual trust. However, mutual trust has to be earned; it flourishes when there is a shared commitment to standards and to the continuous improvement of educational provision. We were therefore gratified to note that the EQF will be underpinned by a robust quality assurance regime. The quality assurance principles set out at paragraph 6.1 seem to us to be comprehensive, except that we would expect any such system to include a strategy for improvement.

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

It is important to recognise that the existence of the EQF will not by itself raise standards of provision: that will depend on the quality of staff, the level of resourcing and much else besides. However, the existence of an EQF is an essential condition for the enhancement of the quality of provision.

Question 6

Any other comments?

As we have indicated, the introduction of the EQF is a most ambitious and complex venture. We wonder if it is worth considering a pilot project which might provide answers to some of the questions posed in this consultative exercise.

Gordon Kirk
Academic Secretary
8 December 2005