

European Qualifications Framework

Consultation Response Form

The closing date for this consultation is: 23
November 2005

Your comments must reach us by that date.

department for

education and skills

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The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

Please tick if you want us to keep your response confidential.

Name Universities UK
Organisation (if applicable) Universities UK
Address: Woburn House
20 Tavistock Square
London
WC1H 9HQ

If your enquiry is related to the policy content of the consultation you can contact Pauline Charles on:

Telephone: 020 7340 4486

e-mail: egf.consultation@dfes.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888

Fax: 01928 794 311

e-mail: consultation.unit@dfes.gsi.gov.uk

Please check one of the boxes that best describes you as a respondent:

<input type="checkbox"/> Secondary Education	<input checked="" type="checkbox"/> Higher Education	<input type="checkbox"/> Vocational Education
<input type="checkbox"/> Adult and Community Education	<input type="checkbox"/> Trade Union or Employer	<input type="checkbox"/> National Sector Association
<input type="checkbox"/> Voluntary or Community organisation	<input type="checkbox"/> Other (please specify)	

Please Specify:

Universities UK is an organisation which works to promote, encourage and develop the universities of the United Kingdom.

1 a) **The rationale of an EQF**

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

Yes

No

Not Sure

Comments:

The most important objectives and functions of the proposed EQF are those relating to increased transparency of qualifications, supporting mutual trust and enabling greater articulation between the education sectors, which we welcome. We have concerns, however, that the excessive detail and complexity of the proposed format will militate against these very important objectives and the EQF's primary purpose as a meta framework.

Please also refer to answers to questions 1b, 2a, 2b, 4 and to the final comments box below.

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

Comments:

The university sector has an important role to play in the implementation and use of the framework. In its present form, however, there are a number of serious practical obstacles to its implementation:

- The EQF and the Framework for Qualifications in the EHEA (the 'Bologna Framework') need to complement each other and their relationship should be clearly articulated. It is of critical importance for the success of the implementation of the framework that users are able to refer to a single European level framework in the knowledge that its constituent parts will be consistent with each other. There is already support in the UK HE sector for the Bologna Framework and it is vital to build on that support. It is, therefore, important that institutions are able to align qualifications to the Bologna Framework through national frameworks. To require institutions and individuals to refer to two European frameworks and to work through the particular requirement of each is likely to undermine the successful implementation of the EQF.
- Related to the above, any emerging differences in the two frameworks need to be carefully monitored and addressed. Divergence in approach in regard to areas such as the use and application of descriptors, learning outcomes, levels, level outcomes, external reference points and the role and understanding of credit will make the implementation of the EQF difficult for the reasons cited above.
- There needs to be clear information provided to universities on how the frameworks are to be referred to at institutional and individual level.
- The tools referred to in the document need to be well understood and implemented. Some of the supporting tools and instruments are ambitious and there is presently significant variation in how national systems have responded to them. It is not clear that convergence will occur in the foreseeable future.
- See also answers to 2a and 2b below.

The reference levels and descriptors:

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

Yes

No

Not Sure

Comments:

A meta framework for qualifications should reflect the levels and outcomes of the award rather than the processes by which learners reached those targets. The more complex the framework, the more difficult it will be to achieve the mapping which calibrates awards.

Meta frameworks primarily act as external reference points, while national and regional frameworks provide the detail. The broader the range of qualifications which the framework needs to accommodate, the more generic and less detailed the meta framework needs to be. UK HE stakeholders strongly believe that, as the meta framework is designed to incorporate a significant number of countries, little detail is required. This will minimise the risk of differing local interpretation. The Bologna Framework, provides this broad essential information for the top three levels and should not be compromised or amended. Furthermore the Bologna Framework, being broad in design, was established in a European sector which is largely binary and thus designed to incorporate the needs of both HE and VET.

The proposed EQF includes a mapping of level descriptors to those in the Dublin Descriptors. This mapping, however, is not accurate and in some cases there are subtle but significant changes of emphasis. We urge, therefore, that such inconsistencies are rectified in the final version so that the EQF truly reflects the descriptors which were adopted for the Bologna Framework.

2 b)

- Do the level descriptors, in table 1 of the consultation document, 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 (in table 2 of the consultation document)?
- How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?

Comments:

It is essential that the use of learning outcomes is fully and consistently embedded in the qualifications frameworks. There is some disjuncture between the EQF on the one hand which includes input indicators, and the Bologna Framework and the frameworks for higher education qualifications on the other. This confusion is compounded in table 2 of the consultation document which also makes reference to 'learning competence'.

The level of detail in table 2 is not appropriate to a meta framework and, rather than clarify and assist implementation, such detail will actually make it more difficult. We urge, therefore that table 2 is removed.

3 National Qualifications Frameworks

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

Comments:

In the UK, higher education qualifications are largely articulated in terms of a learning outcomes approach already.

The UK HE sector has developed much experience and good practice in this area, for example with the Scottish education sector having developed the integrated LLL Scottish Credit and Qualifications Framework, and Welsh stakeholders the *Credit and Qualifications Framework for Wales*. (The situation in England, with regard to credit, is currently the subject of a separate consultation.) It is critical that expertise and developments are taken into account in order to learn from good practice and help to ensure better understanding and acceptance. This is also essential to avoid overlap and confusion between qualification frameworks in existence

4 Sectoral Qualifications

- To what 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?

Comments:

EQF may assist a more systematic development of sector wide competences but only where there is full stakeholder involvement in the early stages of development and implementation. We would, however, have concerns regarding the proposal's emphasis on sectoral frameworks. While it is important, within the context of lifelong learning, to involve the wide-range of education providers, we would not want to see national frameworks by-passed as a result of employers seeking qualifications primary alignment with the meta framework rather than the national framework.

5 Mutual Trust

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

Comments:

The development of mutual trust requires the full recognition of lifelong learning principles across Europe. It must be rooted in a shared understanding and usage of terminology which articulate appropriately with the Bologna Framework and with national frameworks. In order to improve the quality of lifelong learning at all levels, it needs to be fully adopted and integrated in all learning environments and genuinely enhance employability opportunities.

6 Any other comments on the EQF proposal:

Comments:

The proposal for the EQF is on the basis of voluntary participation which we believe to be appropriate. We would have concerns were it to become the source of further regulation within the sector.

It is of cardinal importance that clear institutional autonomy for admissions and awards is maintained but it is unclear how this will relate to the proposals for the use of credit accumulation and transfer.

There are currently different arrangements for credit accumulation and transfer in

operation across the UK . The arrangements for England are currently the subject of a national consultation

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

Here at the Department for Education and Skills we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

xYes No

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: <http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 23 November 2005

Send by post to: European Qualifications Framework Consultation, Pauline Charles, European Union Division, Department for Education and Skills, Area 5C, Caxton House, Tothill Street, London, SW1H 9NA.

Send by e-mail to: eqf.consultation@dfes.gsi.gov.uk