

Piece of advice on the Commission staff working document
“Towards a European Qualifications Framework
for lifelong learning’

Preliminary remarks

The Flemish Education Council, in Dutch: de “Vlaamse Onderwijsraad” (Vlor), is the official advisory body on the education and training policy of the Flemish Community. Representatives of all the different stakeholders in education and training meet in the Vlor. Together they look for ways to improve the education system. The task of the Vlor is threefold: advice, consultation and study. The fulfilment of its assignment results in a lot of different activities. The Vlor publishes advices, but also studies and brochures. It organizes seminars, co-ordinates new projects or the implementation of innovations, brings educational partners together for consultation and stimulates international contacts with other education councils.

The Vlor is composed of a General Council and a council for each of the four levels of education: primary, secondary, higher and lifelong learning. The General Council discusses all educational issues with an impact on the whole education system or on more than one level. It also co-ordinates the activities of the four other councils. These level councils have competence and autonomy for their education level. All stakeholders in the field of education and training are represented in the Vlor. The Vlor also counts a considerable number of commissions which deal with specific themes or educational forms: special education, vocational training, education in arts, consultation between inspection and educational advisory services, equal opportunities, economic sectors, ... Commissions operate under the authority of the General Council or one of the level councils. All the councils can also create temporary working groups to discuss a specific theme or prepare an activity.

In total, about 1800 persons are member of one of the councils, commissions or working groups or participate in projects. This means a considerable amount of education people in the field are involved in the Vlor, and in consequence participate in de education policy making process.

On 24 November 2005, the General Council of the Vlor formulated a piece of advice as an answer on the consultation process of the European Commission on the European Qualifications Framework. The Vlor accepted this piece of advice by unanimous vote.

1 The rationale of the EQF

The Vlor states in the first place that the EQF creates possibilities within the scope of lifelong learning, the mobility of citizens and the transparency of qualifications. But, because of the current voluntary character of the EQF, the possibility to interchange qualifications between the different Member States cannot be guaranteed. However, citizens want to know which individual learning pathway they have to take to acquire additional qualifications.

If, at a certain moment, the EQF should entail recognition of prior learning and to create rights for the individual citizen, this must be realised by a democratic decision-making. The

open method of coordination, which is often used in the field of education and training in Europe, isn't adequate in this matter. The possible effects of the EQF have to be legitimated on the base of the competences of the Member States, respectively the EU.

Further, the Vlor states that the EQF will create a field of tension between, on the one side, the regulation of qualifications and, on the other side, the autonomy of education initiatives for curriculum development and assessment of students.

The Vlor points out that the definition of the key terms in the Commission document is univocal and usable in a European context but that is not the case for the terms 'competence' and 'learning outcomes'. The Vlor states that the term competence is not defined (the document only gives four possibilities). Learning results are approached from the point of view of the learner. The Vlor emphasises that the autonomous education and training institutions will decide if individual learning outcomes are acquired.

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

The Vlor subscribes to the objectives and the functions of the proposed EQF as an important instrument for the Member States, education and training institutions, employers and sectors to be able to communicate with each other on the value of qualifications and to strengthen the position of the learner in the process of lifelong learning.

Further, the Vlor is of the opinion that the EQF is a surplus value for the further development of higher education. In the context of the Bologna process, there are already perspectives of a Qualifications Framework for Higher Education. The EQF places this framework in the perspective of other education levels and sectors and this is a surplus.

The EQF especially opens new perspectives for lifelong learning. It situates education in relation to courses of other providers and to informal and non-formal learning.

Besides advantages for the individual citizens, the labour market and the economical sectors and the concept of lifelong learning, the development of an EQF involves also several risks.

For the individual citizen, the EQF could be an instrument to realise geographical, social, professional and academic mobility. The EQF has in any case an added value in this matter because it focuses on the valorisation of the different possible learning pathways and, because the EQF is able to stimulate lifelong learning, on the sustainable entrance in the labour market and the society and on the accumulation of acquired competences.

However, to be able to realise the objectives and functions, the EQF should be an instrument which is readable for citizens and not only for experts. The Council emphasises the importance of an interface which could guarantee a more facile entrance. In other words, an EQF cannot be limited to a bureaucratic and rigid system.

Concerning the entrance to further education courses, the Council asks if the EQF could create rights for the citizen when he makes a possible entry in a course or in a next EQF level.

It is clear that the proposed EQF creates possibilities concerning the validation of formal, informal and non-formal learning. But, for individual learners, the identification of learning needs, the setting up of a learning path and the steering of their own learning process are difficult tasks. The individual will also be responsible for matching his qualifications with the requirement of his job and the labour market. Therefore, the EQF has to give attention to

supporting aspects which can guarantee a balance between individual and collective responsibilities.

The EQF stimulates mobility of people with intermediate education levels. At the moment mobility is mostly seen between the unskilled and the highly skilled.

The council also advises the EQF should involve a concept of durable employability. Therefore, it is important that the descriptors of the qualification levels should start from a broad concept of competences.

Concerning the concept of lifelong learning, the Council states that we need national (regional) qualifications frameworks as a basis for common understanding. The EQF and more explicitly the NQF offers an instrument to regulate and integrate new and existing educational initiatives into the regular education structure. It also can be a basis for mutual recognition of qualifications both between different sectors (education, training, human resources management) and between Member States.

The EQF should contribute to create more chances for the most vulnerable groups in the society (under- and unskilled workers). Therefore, the EQF has to content entrance levels to stimulate unqualified persons to enter into lifelong learning.

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

The Vlor states that it is necessary to fix an agenda and a corresponding time schedule for the further development of EQF, in coherence with the underlying tools, the directive on professional qualifications and the qualifications structure for higher education.

Furthermore, the Vlor is of the opinion that the EQF is a communication tool at the moment. A linking with other developments should be able to push the matter through. However, it is important to take the first steps now.

Furthermore, the Vlor is of the opinion that a qualifications framework, and surely the EQF, shouldn't refer to possible individual learning pathways because this is the characteristic property of the construction of courses in the different Member States. The Council is against the insertion of table 2 in the EQF document of the Commission because this causes confusion between input and output factors.

For individual citizens

The emphasis on lifelong learning causes a need for a clear survey of qualifications and their mutual relations. The EQF is able to clear up the expectations of individual citizens concerning the results of their learning outcomes.

The council wonders if, in the future, it isn't appropriate to mention the corresponding EQF level on each acquired qualification. This way, the EQF could create the possibility for the Member States and/or the institutions to make a right judgement of the acquired level, which will enhance the intended mobility. The Council also mentions that the diploma supplements in higher education will have to be formulated in learning outcomes. Thus, they will have to leave the subject-related approach. It is also important that Member States should develop a univocal terminology about the names on their qualifications.

For education and training systems

The Council wonders what will be the validity of formerly given certificates when a qualification gets on a certain moment new or adapted learning outcomes as output.

References to possible learning pathways should not appear in a qualifications structure, and especially not in the EQF, because this is the characteristic property of the construction of courses in the Member States.

For the labour market

It is necessary to clear up the role and the responsibility of the different sectors and the involved social partners in relation with the national structures and the European level. The Commission document seems to suggest that sectors should be able to link their qualifications directly to the EQF.

A social dialogue on European and regional/national level has to clarify, on the one hand, the relation between sectors and national authorities and, on the other hand, the transversal responsibilities of the different authorities (work, education, training).

It is essential that the final responsibility should stay in the hands of the public authorities in the Member States because a coordinated qualifications structure is a public responsibility. The Council refers to the conclusions in point 1 on the autonomy of the institutions. Furthermore, it is important to start up a consultation process within the Member States which involves all the partners (social partners, the actors in education and training...)

1.3 What is the added value for your organisation?

A national qualifications structure has to describe certificates and titles in terms of competences, not in terms of learning pathways. However, a qualifications structure should be relevant for the whole field of education and training. So, it is not possible to limit a qualifications structure to secondary and adult education.

1.4 How can the EQF improve the vertical and horizontal mobility of students and persons in search of employment?

As mentioned in point 1.1, the Vlor agrees with the development of the EQF, in which common references will be supported by different tools such as Europass, an integrated system of credit transfer and accumulation for lifelong learning and common principles and procedures which enhance the cooperation between different levels. The EQF is, in this scope, an important step for the implementation of the Lisbon objectives and for the further realisation of the Copenhagen process. However, there is a need for additional supporting tools to realise an accumulation of competences in function of better employment and the recognition of competences in function of further education.

The concept of mutual recognition also has to be placed in a future perspective. Besides the EQF, we also have the qualifications framework for higher education, the directive on the professional qualifications, the ISCED- and the SEDOC-levels. The Council is convinced that a common approach, based on learning outcomes, will be necessary in the future. This way, it should be possible to compare different education systems.

In function of the entrance to professional qualifications, the document of the Commission states that only the directive is binding for the Member States. In the coming years, a lot of attention should be given at the creation of coherence between this directive, which only deals with recognised professions, and the EQF. However, the directive starts from another reference framework than the EQF.

2 The reference levels and descriptors

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

There is a need for a more intensive study on the descriptors that are used in the Commission document to fill in the reference levels sufficiently. At the moment, it is not clear from which concepts these descriptors depart.

The Council states that the descriptors should have a scientific basis. They have to take into account several dimensions (HRM, education) and they cannot only be described from a too one-sided academic view. Attention also has to be paid to the insertion of the key competences and the meta competences as a part of national qualifications.

Furthermore, the Council emphasises the ability of the EQF to approve a broader entrance to education and to enhance the chances of new target groups. Therefore, the Council states that the levels shouldn't be used as barriers to prevent entrance to education. It cannot be the case that one has to pass through all the previous levels to enter in an advisable way in a particular level of education.

2.2 Can you link the qualifications in your working area at the levels of the reference structure? If not, what is lacking in the structure with 8 levels?

The Council states that it did not examine the fact if each Flemish qualification could be linked at the reference levels. The Council thinks that this must be possible for most of them. There must be some attention for specific types of education (e.g. basic adult education) which aim at an entrance level. The linking of all presented qualifications to the EQF has to be done at first at national level, in a national qualifications framework.

To realise an efficient linkage, it is necessary to clarify the concept 'competence'. In fact, there is no definition of this concept in the document. There is only an enumeration of four possible types of competences. The Council states that the concept competence can be filled in differently depending on the context. Nevertheless, the concept 'competence' has six essential characteristics¹:

- competences are linked to a context
- competences are an indivisible cluster of skills, knowledge, attitudes, qualities and opinions
- competences are variable after some time
- competences are linked with activities/tasks
- learning and developing are conditional to acquire competences
- different competences are in relation to each other

¹ Nederlandse Onderwijsraad (Dutch Education Council), Competenties, van complicaties tot compromis. Over schuifjes en begrenzers, November 2002.

2.3 Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?

It is of major importance that the three different components (knowledge, skills and professional and personal competences) are involved at each level.

The Council notices that it is possible that knowledge and skills can be situated at EQF level X and that, at the same time, professional competences have to be situated at EQF level Y. This possibility isn't mentioned in table 1 because all descriptors are appointed to one specific level. The Council doesn't support the vision to link one specific level at each of the three separate components. Each Member State will also have to formulate guidelines to establish the link between the EQF and national qualifications.

2.4 What do you think of the subdivision in knowledge, skills and broader aspects of competences?

As mentioned in point 2.1 there also has to be attention for the inclusion of key competences and meta competences. One has to watch over the danger that the content and the aim of education and training courses should be reduced to the demands of a qualifications framework. This could reduce the autonomy of the education and training systems. Citizenship, personal development, critical attitude, meta-competences and, in general, the social and ethical dimension are essential parts of each educational programme. Furthermore, educational programmes are built up evenly, starting from professional and social expectation on the one hand and from specific needs of the learners on the other hand.

2.5 What should be the content and role of the 'supporting and indicative information' on education, training and learning structures and input (table 2)?

The Council advises to develop table 2 on national level. This development has to be the result of a national consultation with the different education and training partners in order to create a national framework of courses and qualifications.

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

The Council states that it is necessary to clarify the relation between the titles of professional ability and the certificates and diplomas granted by education and other training providers. In this respect, it is necessary to clarify the relation between these standards on the one hand and the specific exit qualifications on the other hand.

Sectoral qualifications must be linked, not tuned, to a national qualifications framework and not directly to the EQF as it is proposed at the moment in the Commission document.

2.7 Does the framework permit to include all categories of qualifications in Flanders? If not, what is lacking?

The Council notes that, by building up the proposed EQF level by level, there is a danger that a hierarchy arises between persons with higher and lower qualifications. The document isn't very clear concerning the accumulation and the transfer of credits at the different levels.

Further, the question rises if the different qualification levels have to be passed one by one. The Council is of the opinion that it should be possible to jump to a not adjoining level.

3 National qualifications frameworks

3.1 How can a National Qualification Framework for lifelong learning be developed in your country – reflecting the principles of the EQF - be established? Or rephrased: How can we use the EQF to develop a Flemish qualifications structure?

The Council indicates article 127 of the Belgian Constitution which lays down that the federal government is competent for the definition of the start and the end of the compulsory education, the regulations of retirement and the minimal conditions for granting diplomas.

Starting from a piece of advice of the Supreme Administrative Court of Belgium on the decree on the structure of Higher Education (33/808/1/VR) and the judgement (44/2005) of Court of Arbitration of February the 23rd, we can deduce that these minimal conditions have to be read restrictively. Moreover, the article states that preparatory actions refer explicitly to Europe as regulator of the equivalence of diplomas. These minimal conditions deal with the elements which are really qualifying for the equivalency of diplomas:

- The large subdivisions in levels (preschool education, primary and secondary education, short higher education, long higher education, university). The subdivisions within a level are a matter for the regions.
- The minimal global duration (the amount of years of study, study weeks, hours a week. This can be expressed in hours, years or credits). The global duration guarantees the equivalency of diplomas in full-time or part-time education. The minimal duration gives the regions the possibility to ask more.
- Diplomas are granted after termination of a large subdivision.

We can conclude that there are two ways to realise a qualifications framework:

- Either the federal government (Belgium) develops a framework in which the large subdivisions and the minimal duration are presented and where the regions can add adjustments.
- Or the regions develop own qualifications structures, which don't contradict with formerly agreed rules.

In both solutions, the regions will be responsible for the fine tuning of the qualifications framework. However, it is not very clear what will be the impact of the insertion of learning outcomes as an output element of a qualification level because the Constitution defines equivalency in terms of study load.

The Council indicates on the one hand a need for cooperation with the Netherlands concerning higher education for the reason that there is a common accreditation procedure. On the other hand, it is clear that there must be some coherence with the French speaking community in Belgium. Probably the EQF can realise this coherence.

Concerning the coherence between the Bologna process and the EQF, the Council states that the decree on the structure of higher education has given an initial impetus to the construction of a qualifications structure for higher education. It is important to build further

on these data. It should not be wise to take other options. It is important to consult the sector to add some adjustments (e.g. the place of the some post-graduate courses)

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

It would be better if the development of a qualifications framework is preceded by a conceptual phase. In this phase, the concepts (competence, qualification...) can be clarified, as already stated in the policy note of the minister of education and training. Consultation with all the involved partners (education and training authorities, social partners, government...) will be necessary. In this consultation, attention should be paid to:

- 1 The qualifications framework will be positioned in relation to international developments. This will guarantee the transparency of the education and training supply towards other partners in the European Union.
- 2 This conceptual phase has to clarify the relation of the qualifications framework with other tools of transparency like the different reference levels for the classification of qualifications, the application of ECVET in a Flemish credit system, Europass, the recognition of formal, non-formal and informal learning... The qualifications framework has to allow that the Flemish education follows the recent European developments.
- 3 There must be a link between the qualifications framework and the certification and diploma policy in education and training. It surely is necessary that a graduate in a vocational training should immediately acquire the corresponding title of professional ability. A point of further consideration is the question what is meant with the notion 'qualification'. To be able to manage your own social life supposes more than the insertion in the labour market.
- 4 The procedures, the partners in the consultation and the respective responsibilities in this process have to be clarified.

The Vlor states that educational institutions should be able to develop a policy for recognition of competences at their own appropriate level.

Finally, it is important to mention that the development of a national qualifications framework is a part of a reform process in education and training. In the scope of a co-ownership, it is important that all actors in education and training, in consultation with the social partners, should be involved in the construction of a necessary implementation strategy.

3.3 Is it necessary to link the recognition of learning outcomes to a system of credit accumulation and credit transfer?

The central question of the recognition of acquired competences is to what extent the acquired competences correspond with a specific qualification (attest, diploma, certificate...)? This question can be answered by the construction of a comprehensive and standard framework, in which all qualifications are included.

As mentioned in point 2.7, we cannot derive from the document if acquired credits can be transferred to a next level. The Council has the opinion that this should be possible.

There is a need for a good credit system. The two concepts of existing credit systems (workload and learning outcomes) must be tuned to each other.

4 Sectoral qualifications

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

...

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

...

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

...

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

The Vlor thinks that the education world and social partners must play an active role in the development of a national qualifications framework. This way, the education world can, starting from its own pedagogical and social order and its culture, take advantage of the expectations of the sectors towards education. It is also possible to protect the educational world from these expectations. Sometimes, the educational policy of the sectors, for instance by defining qualifications, doesn't mesh with the policy of the education world. The Vlor pleads for a direct consultation between education and the sectors when sectoral qualifications have to be linked to the national qualifications framework.

The Council emphasises that it is necessary that sectoral qualifications are linked to the national qualifications framework. Otherwise, the system should be able to create new barriers for pupils, course participants and students. Afterwards, these national qualifications can be linked to the EQF. Moreover, the Council repeats, as mentioned in point 1.2, that the public authority has the final responsibility for this link between sectoral qualifications and the NQF, because a coordinated qualifications framework is a public responsibility. Therefore, it is necessary that the government starts up a consultation process in which all actors are involved.

5 Mutual trust

5.1 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?

Transparency of qualifications has to be built on the basis of mutual trust. This necessity will even be emphasised when a credit system for vocational education and training will be developed. The Council is of the opinion that this mutual trust between Member States and/or institutions can be created in a first phase by realising moments of peer learning and study visits.

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

The EQF can become a reference to improve the quality of lifelong learning if additional supporting tools, that enhance the transparency and the credibility of the different systems, are developed.

The Council states that the EQF can only be fully functional when it is connected with a solid system of quality control based on standards of quality. Therefore, we need a common approach between ISCED, the directive and the EQF. Otherwise, Member States can account for protectionist measures starting from their own quality tools.

In every way, we have to build in enough guarantees to avoid an upgrading of the qualifications systems in Member States by linking them to the EQF. Therefore, the links of a national qualifications framework to the EQF cannot be done by an individual effort but this process must be guided and supported by European experts who watch over a correct implementation. They only have to pay attention to the link with the EQF and to the system of quality control. In this context, we can ask some questions about the profile of these experts and about the criteria for the quality control of the link with the EQF.

5.3 What do you think about the principles of quality control in the document of the Commission?

The Vlor emphasises the importance of a full system of quality control for vocational education and training, inside and outside the educational system. This system has to be embedded in national and regional realities. It should be wise to choose for a set of indicators which incite to meta and self evaluation.

After all, the Vlor is in favour of a stimulating policy of the European Union on quality control without pushing one particular model.

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