

York St John College, UK

– Feedback comments on the consultation document on the ‘European Qualification Framework for Lifelong Learning – A Commission Staff Working Document’

‘Towards a European Qualifications Framework for Lifelong Learning’ Brussels, 8/7/05

1 Introduction - Rationale

York St John College has long been committed to lifelong learning and the consistent application of UK Quality Assurance Agency for Higher Education (QAA) recommendations, especially in its successful achievement of taught degree awarding powers. The QAA has provided significant input to the development of the EQF and this institution prides itself on its compatibility with QAA guidelines and therefore supports the principles and practice set out in the EQF proposal which is both useful and sensible. This institution has also committed to the agenda of widening participation and would urge the EQF to take full account of how best to support greater access to education at all levels, and in particular access to Higher Education. The EQF initiative marks a significant step in the process towards implementation of the Bologna Process and the ambition to create an EHEA. With a wider remit than Bologna, the EQF should also lead to greater transparency and simpler comparisons between different providers, and different qualifications in various sectors. As such it should bring benefits to all stakeholders. A single EQF should also provide economies in terms of the bureaucratisation of education across the European space.

The EQF must incorporate maximum flexibility in order to achieve implementation. It must demonstrate a commitment to widening participation and lifelong learning. Its success depends on transparency in all its dimensions, in order to achieve acceptance and full value for its many stakeholders.

2 Implementation, mutual trust and self certification

Variations in national cultures and in educational systems, as well as differences in sectors, risks inconsistent application of the EQF objectives. It remains to be seen to what extent the common objectives are in practice treated as benchmarks in up to 45 different national contexts and across a wide number of sectors. This relates to the issue of mutual trust – something which is only likely to emerge if the general rule of thumb is that national frameworks adapt to the EQF on the basis of self certification.

There is likely to be considerable national variation in implementation – where EQF is regarded as just one part of the Bologna Process, given that implementation of Bologna is still very much an on-going task with a less than uniform progress across the continent. In fact, the EQF extends across all sectors of education, while the Bologna Process is limited to the HE sector. EQF should complement the Bologna EHEA-QF and there should be clarity in the relationship between the EQF and the Bologna EHEA-QF.

How can individuals, HEIs and employers readily assess the extent of compliance with the EQF? A systematic evaluation of progress and implementation, checking compliance and compatibility with the EQF, is unfortunately unlikely to build trust, but at the same time there should be transparency in how EQF is applied in all national contexts. If effectively achieved, this would go some way towards establishing trust in the workability of the EQF and facilitate making comparisons between different actors in the process.

3 Credits, hours of study and HE cycles

There remain significant variations in the postgraduate frameworks (M level qualifications) in terms of credits, hours studied, length of course (1 year, 2 years, 2.5 years, even 3 years – especially where part time studies are concerned). There may also be significant differences in the credit systems applied in different countries, especially where some credits contributing to an MA award are not at M level (e.g. 180 credits to achieve M level, of which 160 must be at M level – i.e 40 are at a level lower than M level). Variations like this may have some affect on comparing different qualifications).

In the UK the credit system equates two UK credits to one European credit – if this 2 to 1 is retained and applied throughout, it should not be problematic, but there needs to be equivalence in terms of hours of study accorded to modules throughout the EHEA, otherwise it appears that some programmes in some areas lack equivalence to those in other countries.

The EQF should fully support and assist the implementation of ECTS.

4 Implementation and administrative burden

Effective benchmarking against the EQF and implementation of its wide ranging recommendations, as well as comparative studies of such implementation across national boundaries, and throughout various sectors, places a large administrative burden on already overstretched resources. There is no extra financial provision for the introduction of the EQF. It will be important for institutions to be able to align with national frameworks which will then adhere to the Bologna framework, otherwise it may be that smaller HEIs, with fewer students and therefore smaller budgets, may be at a disadvantage in terms of their compliance with the EQF. This would run a risk of exacerbating differences between institutions rather than promoting convergence.

Variations in research experience, both between large and small institutions, may lead to uneven implementation. Larger HEIs with research experience in the areas covered by the EQF will be better placed to respond adequately as they can use existing expertise. Smaller institutions will be on a steeper learning curve and/or they may be less likely to apply the EQF as effectively.

Difficulties such as those raised above may undermine confidence and trust across the continent and between different national educational communities. There is a danger of a *de facto* league table of effective implementation leading to imbalances and inconsistencies. Again, the risk is that varying levels of implementation lead to less – rather than more – convergence.

5 Reference levels, learning outcomes, competence and transparency

The document defines learning, learning outcomes, competence, qualifications, etc. Of these defining competence is the most problematic in the context of EQF – because of its variable and subjective nature. It is especially difficult to be prescriptive in terms of concepts like experience, personal competence and ethical competence – especially in widely diverse cultural contexts. The key requirement should be to retain flexibility in the EQF while building trust in different national authorities and their efforts to comply with the framework.

Learning outcomes need to clearly indicate the entry level for HE but must respect flexibility in various entry routes. This flexibility must enhance the widening opportunity and lifelong learning agendas. Recognition of prior learning experience is essential.

At all points and at all levels, the EQF must be transparent to all users and all stakeholders. Transparency is central to the success of any EQF and in particular the effort by national authorities to map NQFs to the EQF. Transparency is best measured in terms of outcomes.

The eight level reference structure looks appropriate – more would be burdensomely complex.

6 Application of a meta-framework

The Meta-framework, effectively the heart of the EQF proposal, seeks to create confidence and trust in relating and comparing qualifications across different countries and sectors. The creation of an effective meta-framework relies upon transparency, sound quality assurance, effective guidance and information systems and credit transfer and accumulation. This is the most ambitious part of the EQF proposal, especially as it needs to confront such a multitude of cultural assumptions and practices both nationally, regionally and within and across sectors. It must also achieve recognisable and easily understood benefits for a range of stakeholders and individuals. In order to achieve this trust, self certification should be the *modus operandi* for implementation of the EQF at a national level.

There may be a tension between the framework ambitions of the EQF and its lack of actual prescription. This is inevitable since the EQF has no legal foundation and is not a set of rules. It is a reference point and a set of principles. The extent to which implementation of the EQF is delegated to national authorities and its various stakeholders is thus both a strength and a weakness. The EQF may experience a similarly slow uptake as has the Lisbon Agenda of 2000.

7 Scope of the EQF

The EQF should be extended to all 45 **Bologna Process** signatory states and not simply the European Union members plus selected others.

York St John College
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