



CONSULTATION ON A EUROPEAN QUALIFICATIONS FRAMEWORK

RESPONSE FROM THE EUROPEAN ASSOCIATION OF REGIONAL AND LOCAL AUTHORITIES FOR LIFELONG LEARNING (EARLALL)

The Commissioner for Education, Training, Culture and Multilingualism, Ján Figel', invited stakeholders to comment on the Commission's proposals for a European Qualification Framework (EQF) by the end of 2005. The European Association of Regional and Local Authorities for Lifelong Learning (EARLALL) welcomes the proposal and would like to make a number of comments on the consultation document¹ issued by the Commission.

These comments also include some of those made by EARLALL members and others at a UK Presidency conference held in Glasgow in September 2005 on the proposals for an EQF.

Consultation responses (as set out in Ch 9 of the document)

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?*

EARLALL welcomes the proposal for an EQF. The objectives and functions set out are the starting point for a developing a system of increasing transparency and recognition. However, the document would benefit from greater clarity – for example, there is some confusion about the overall purpose of the EQF and whether there is an aim to harmonise systems or simply to facilitate mobility. It also needs to be clearer about the benefits to less traditional forms of learning – informal and non-formal learning, in particular – rather than focus on the formal, 'academic' approach.

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

To be successful, the EQF needs to be:

- an overarching simple, clear, non-regulatory framework based on transparency and trust;
- understood by those not familiar with educational terminology; and
- consistent with developments in credit transfer

The most important aim is that the EQF needs to be kept simple. Perhaps the simplest way of helping the EQF to work will be to ensure that it fits with existing national frameworks as much as possible rather than introducing a

¹ 'Towards a European Qualifications Framework for Lifelong Learning', SEC(2005)957
http://www.europa.eu.int/comm/education/policies/2010/doc/consultation_eqf_en.pdf



separate system of levels and descriptors. It therefore needs to be kept as

simple as possible, allowing national frameworks to deal with detail.

An overarching 'meta' framework needs to be comprehensible to learners and understood and accepted by employers, and needs to offer clear added value to both groups. Stakeholders in the provision of learning also need to appreciate the relevance of the framework to the structure of qualifications and provision in their respective countries; and it is important therefore that the EQF remains a voluntary 'meta'-framework so that ownership is achieved through perception of relevance, rather than by supervening regulation.

So communication is a critical first step. The marketing plan should have a two stage approach – stage one to include key stakeholders the learners provider network – schools, further education, higher education, education policy makers; sectoral industry bodies, and higher education admissions tutors. The second stage should be a wider dissemination to learners and employers.

The reference levels and descriptors

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

They offer broad reference levels and so appear to be appropriate. It should attempt to include lower levels of qualifications at 'entry' level so that those without existing qualifications can be more easily included – helping to encourage lifelong learning at all levels. They also need to embrace all forms of learning, particularly the informal. However, there is considerable complexity in existing systems and there is a risk that an attempt to capture all their elements could make the Framework too complicated.

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

These need to remain broad and generic. The learning outcomes approach is necessary but the descriptors should not become more detailed, in case the EQF shifts from its 'meta'-framework structure.

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

As it states in the report that this is supplementary information to provide further guidance to level descriptors. As such it is useful. However, it needs to avoid setting further requirements on learners and providers: the information needs to be clearly seen as explanation rather than direction.

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



The regions of EARLALL have a number of different systems, so there is no single answer on this. However, EARLALL can assist the implementation of the EQF by working with its members on developing common descriptors of credit and qualification systems and where appropriate, common competencies. To this end the current EARLALL project, ESVAC, is aimed at producing a quality assurance model in respect of competence certification.

National Qualifications Frameworks

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

Again, different member states and regions have different systems. Regions are at different stages in development of national reference frameworks, and there is considerable work still to be done.

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

Some regions have already done so: others may take a number of years. EARLALL will monitor its members and will maintain regular discussion with the Commission in developing this agenda.

Sectoral qualifications

- *To which 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?*

The link to sectoral and professional qualifications will be very important. Experience in some regions shows that sectoral have found the qualifications framework route an invaluable starting point for identifying and tracking learners and learner programmes. Partnership development has been absolutely critical in these developments. We would strongly recommend that further development of EQF takes place in partnership with such stakeholders.

At the same time, EQF needs to build on existing knowledge and experience developed through parallel process such as Bologna.

**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?*

The EQF cannot make itself a reference point: it will have to gain trust and acceptance in order to become one. This cannot be achieved quickly but will rely on the building of effective partnerships at a number of levels.

Mutual trust is largely centred around recognising and acknowledging the appropriate quality assurance mechanisms adopted to populate the national qualifications frameworks. It is important to recognise that these quality assurance systems may be different from sector to sector - for example, Higher Education may differ from the Awarding Bodies - but at the core needs to be a mutually acceptable quality assurance process.