

UK higher education sector position paper

27 November 2006

UK higher education sector position paper on the European Commission's Recommendation on the establishment of a European Qualifications Framework for Lifelong Learning

Introduction

The UK HE sector is supportive of efforts to create an EQF to encompass all education in Europe, as indicated in its response to the Commission consultation in 2005¹. The comments which follow are in line with the report and conclusions of the European Commission's consultation conferences in Glasgow and Budapest in 2005². The Commission's Recommendation includes elements which do not reflect the outcomes of these events. In particular, the UK HE sector has concerns regarding the EQF's relationship with the Bologna Process, national qualifications frameworks and quality assurance arrangements. It is essential that the Commission addresses these issues for the EQF to be accepted by stakeholders across Europe.

Support for the objectives of the EQF

1. The UK HE sector welcomes the broad objectives and purpose behind the EQF, as outlined clearly and logically in section 4 of the Commission's original consultation document. In particular, the UK sector welcomes the Commission's statement that "*an EQF would not replace existing or emerging national and/or sector frameworks; it would fulfill additional and different tasks and should not be understood as the 'the sum' or 'representative average' of national/sector frameworks.*" It is essential that the Commission's final Recommendation on the EQF reflects this statement.
2. The UK has experience in the development of qualifications frameworks. The Scottish education sector has established the integrated Lifelong Learning (LLL) Scottish Credit and Qualifications Framework³ and Welsh stakeholders the Credit and Qualifications Framework for Wales⁴. UK experience in

Enquiries

Jessica Olley
Davina Foord
Paul Dowling

Tel

020 7419 5423

Fax

020 7383 5766

Email Jessica.Olley
@UniversitiesUK.ac.uk

Email Davina.Foord
@Universities.ac.uk

Email Paul.Dowling
@UniversitiesUK.ac.uk

¹ The sector response can be found at:
www.europeunit.ac.uk/resources/Final%20UK%20HE%20EQF%20response%20NOV%2005.doc.

² The report of the Glasgow conference can be downloaded at:
www.scqf.org.uk/downloads/EQF%20Conference%20-%20Conference%20Report.pdf.

³ <http://www.scqf.org.uk/>

Chief Executive
Baroness Warwick

Europe Unit
Universities UK
Woburn House
20 Tavistock Square
London WC1H 9HQ

Tel +44 (0)20 7419 4111
Fax +44 (0)20 7388 8649
Email info@UniversitiesUK.ac.uk

Company limited by guarantee, registered
in England and Wales No. 2517018
Registered charity No. 1001127



developing qualifications frameworks can inform the establishment of the EQF and support its acceptance.

Subsidiarity

3. The responsibility for education and for national qualifications frameworks and their quality assurance rests with individual EU member states. The 'added value' of an overarching, meta-framework at European level is to have common reference points which can encompass the whole spectrum of lifelong learning and facilitate the recognition of qualifications and learning between different sectors of education and training in different countries. The European Commission stresses that the commitment to use the EQF by nation states would be 'voluntary'. However, the Commission chooses a legislative instrument under Articles 149 and 150 of the EU Treaty for its proposal. Aspects of the Recommendation go beyond the competence of the Commission. It is essential that the EQF remains voluntary as originally set out in the Commission's consultation document.

Compatibility with the Bologna Process

4. If the EQF is to be successful, it is essential that it complements existing arrangements within the Bologna Process to create the European Higher Education Area (EHEA). The proposal should clarify that the EQF will not replace the Framework for Qualifications of the EHEA adopted by HE Ministers from 45 Bologna Process participating countries in Bergen in 2005. The reference levels and descriptors in the EQF are **generic** descriptors which encompass the spectrum of lifelong learning and are neither suitable nor intended to replace the Dublin Descriptors within the Framework for Qualifications of the EHEA. The Dublin Descriptors were developed specifically for HE and are of use for the majority of HE qualifications. Participating countries have established, or are in the process of establishing, HE qualifications frameworks consistent with the Dublin Descriptors. The Recommendation should therefore make clear the relationship between the EQF descriptors and the Bologna Process by including the Dublin Descriptors in the Recommendation as an additional annex, noting the Bologna Follow Up Group's (BFUG) full responsibility for them.
5. National arrangements for quality assurance and national qualifications frameworks are central to improving the quality of all levels of learning. The proposal should clarify that responsibility for quality assurance will remain with the national qualifications frameworks. It is also essential that the EQF reflects the quality assurance developments within the Bologna Process. Quality assurance agencies, higher education institutions and students have developed European Standards and Guidelines for Quality Assurance in the EHEA which were adopted by Ministers from 45 Bologna Process participating countries in Bergen in 2005⁵. It is therefore vital that reference is made to these in Annex II. This would maintain consistency with the Commission's

⁴ <http://www.elwa.org.uk/ElwaWeb/elwa.aspx?pageid=1612>

⁵ The Standards and Guidelines can be viewed at: www.bologna-bergen2005.no/Docs/00-Main_doc/050221_ENQA_report.pdf.

Recommendation on further cooperation in quality assurance in HE which also refers to the Standards and Guidelines.

Relationship with national qualifications frameworks

6. There continues to be a high level of confusion about the goals and purposes of different qualifications frameworks operating in Europe. It will be important that the Commission works to clarify and communicate the role of the EQF as a meta-framework acting as a neutral reference point for existing national and sectoral qualifications frameworks.
7. As the Commission's original consultation document indicated, the EQF will not supplant national qualifications frameworks which remain within the responsibility of member states. Individual qualifications will not reside in either the Bologna Process Framework for Qualifications of the EHEA or the EQF. Individual qualifications should therefore not be matched directly with EQF levels, but alignment should be between national qualifications frameworks and EQF. While reference to EQF could be made on certificates, it would not be appropriate to have individual new qualifications assigned an EQF level as proposed in paragraph 3 of the Recommendation.
8. It is unclear how the development of a EQF Advisory Group supports the purpose of the EQF. The EQF will provide a common reference point for existing frameworks. It would therefore be inappropriate for the EQF to take on the functions of existing frameworks through such an advisory group as proposed in the Recommendation. Should such a group be established, appropriate experts, including those with experience of developing overarching national qualifications frameworks for lifelong learning, should be included.
9. As highlighted during the consultation on the EQF, the Recommendation does not accommodate basic entry level learning. The UK HE sector proposes the inclusion of a level 0 to cover all learning below that for level 1.

The role of national centres

10. Further clarification is required on the role of the proposed national centres. It will be important to avoid the development of potentially costly and bureaucratic structures and to build on existing guardians of national qualifications frameworks where possible. Furthermore, Member States with more than one national qualifications framework should have the possibility to establish more than one national centre, as appropriate.
11. The Recommendation refers to national qualifications systems (paragraph 5). To avoid confusion between qualifications and levels it would be more appropriate to refer to "*referencing levels of national qualifications frameworks or systems to EQF levels*". This wording would be more inclusive and accommodate those countries which have qualifications frameworks based on learning outcomes.

12. It would not be appropriate for national centres to “apply” the quality assurance principles set out in Annex II (paragraph 5b). As stated above, existing quality systems, including the European Standards and Guidelines for QA in the EHEA developed within the Bologna Process, will remain the primary reference points for quality assurance at European level. These Standards and Guidelines reflect the operational QA systems within 45 Bologna Process participating countries.

Relationship with the Directive on the recognition of professional qualifications

13. The UK HE sector notes that the recognition of professional qualifications falls within the scope of Directive 2005/36, which has force of law, and that it operates according to criteria and mechanisms which are wholly distinct from those used by EQF.
14. One inference to be drawn from the Recommendation is that the Commission will embark on a rolling programme to align the professional qualifications Directives and Regulations with the EQF. The UK HE sector believes such alignment to be technically and politically complex. Such matters as the re-definition of sectoral qualifications in terms of learning outcomes, as well as the recalibration of the 5 levels of qualification described in Directive 2005/36, should be undertaken only on the basis of full consultation with the HE sector and with professional bodies.

Learning outcomes

15. The UK HE sector welcomes the Commission’s recognition of the importance of the learning outcomes approach as crucial in enabling learning to be compared in Europe through qualifications frameworks. This reflects Bologna Process developments where the Framework for Qualifications of the EHEA and national qualifications frameworks are developed through the learning outcomes approach. The Recommendation refers to “*national qualification systems*” (paragraph 6b) with no reference to levels or learning outcomes. It would be helpful if the Commission’s Recommendation referred more explicitly to the central role of learning outcomes in the development of national qualifications frameworks.

Credit

16. The Recommendation’s Explanatory Memorandum indicates that the EQF will “*strengthen and take forward*” the existing European Credit Transfer System (ECTS) and emerging European Credit Transfer System for Vocational Education and Training (ECVET). The UK HE sector would be concerned by any efforts to link credit to the EQF before proper debates on these systems have taken place.

Timescales and pilot projects

17. Clarification on the timetable for implementation of the Recommendation would be helpful. Notably, the reference to 2009 in paragraph 2 of the Recommendation and whether this refers to the academic year 2009/10. The UK HE sector also urges to the Commission to carry out pilot projects “*addressing the particular needs of national authorities and sectors*” as proposed in the Commission’s original consultation document on the EQF. Such pilot projects should involve an



existing comprehensive national qualifications framework and will be essential for the success and acceptance of the EQF across Europe.

For more information, please contact Jessica Olley, Acting Manager, UK HE Europe Unit, at email: Jessica.Olley@UniversitiesUK.ac.UK, tel +44 207 419 5423.