



*The National Unions of Students in Europe*

*Policy statement*

# **European Qualification Frameworks**

*Adopted at the 49<sup>th</sup> Board Meeting  
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ESIB – The National Unions of Students in Europe in principle welcomes the initiative taken by the European Commission to establish an European Qualifications Framework<sup>1</sup> (EQF) for Lifelong learning. However, ESIB stresses that the European Commission has limited competencies for education, which also differ between the educational sectors. Therefore, ESIB strongly believes that the ownership of an EQF must not only be with the European Commission, but that rather the ownership shall be with all stakeholders of the educational sectors affected. Thus, the EQF must be discussed and further elaborated in a forum gathering all those stakeholders.

ESIB takes note of the Consultation Document “Towards a European Qualifications Framework for Lifelong Learning” and welcomes the consultation process of all relevant stakeholders. ESIB, representing over 10 million students from 34 countries, hereby wants to stress its most important remarks, comments and concerns on the establishment of a EQF.

ESIB regards as the major purpose of the establishment of an EQF an increase of accessibility to different educational sectors and their programmes. The Learning Outcome<sup>1</sup> approach is key to reach this: Using outcome based descriptors within an EQF, the different competence<sup>1</sup> levels are abstracted from the way on which the individual learner reached the respective competences, e.g. type of institution or teaching methods. Thus, the sector of the educational system, in which a competence was achieved, does not stay in the foreground anymore when it comes to access to other programmes, sectors or jobs.

#### *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?**

ESIB regards the following as functions and objectives of an EQF:

- To ease mobility between different countries in Europe, both in terms of mobility on the labour market as well as mobility within the educational system.
- To ease mobility between different sectors of the educational system by a consequent outcome oriented approach, which abstracts competences from the specific way they were achieved.
- To ease curriculum development by national or sectoral QFs which are aligned to the EQF.
- To reach a higher degree of comparability of qualifications<sup>1</sup> in the same professional sector which were gained in different educational circumstances.
- To increase social mobility by facilitating access to higher education. The recognition and validation of prior learning plays an important role here.
- To foster lifelong learning by creating a transparent framework preventing “dead ends” in education biographies.

However, ESIB regards as the most important aim to reach easier mobility between and access to the different sectors of education. To achieve the goal of greater social cohesion

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<sup>1</sup>The terms Learning Outcomes, Competence, Qualification and Qualifications Framework are used in this document according to their definition in the European Commission's Consultation Document “Towards a European Qualifications Framework for Lifelong Learning” (Brussels, 8.7.2005, SEC(2005) 957).

within Europe, it is necessary to make more people able to access higher education as well as to open alternative ways of access to higher education. To reach a sustainable improvement for society as a whole raising the absolute number of students is not sufficient, whilst still necessary. Moreover, it needs to be ensured that the student body gets more diverse in terms of social groups.

The possibility to access higher education from the vocational education and training sector is a crucial point when it comes to widening access between sectors. ESIB stresses that an EQF is only useful, if it makes more people from the VET sector able to enter a higher education programme.

Furthermore, ESIB stresses that an EQF can only reach its goals and sustainably improve the educational system in case that its introduction is accomplished or followed by further instruments being put in place. Especially, measures to recognise prior learning, easy recognition of degrees and study modules from other institutions need to be in place to reach the goals.

The EQF is neither an end in itself nor the universal panacea, moreover it can support and ease other tools and actions, as e.g. the recognition of degrees and periods of studies.

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

The EQF must be easy accessible and understandable, both by citizens and stakeholders. Especially learners need to see their possible benefits. This means in particular that there must be clear links to those transparency instruments, which may be supported by an EQF, through giving an additional possibility of describing a qualification in terms of its alignment to an EQF level. These instruments are primarily the Diploma Supplement, the EUROPASS and ENIC/NARIC databases. An EQF must lead to light-weight and non-bureaucratic possibilities for learners and employees to get their competences of different kinds recognised, especially in terms of access possibilities to education programmes.

It is of utmost importance that an EQF creates possibilities to have competences from informal and nonformal learning settings recognised as well as that an EQF opens a greater variety of and more flexible routes in the educational system as a whole. Therefore, adequate measures to have informal and nonformal competences recognised need to be put in place. Those measures have to be accessible to learners independent of their social or economic background. Greater social cohesion is only reachable by procedures which are transparent, uncomplicated and free of charge.

To reach the goals of an EQF in connection with National Qualification Frameworks, a functioning self-certification of a NQF's alignment to the EQF need to be in place. Only if the self-certification procedures are reliable, mutual trust in the alignment of qualifications can emerge.

*The reference levels and descriptors*

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

The 8-level structure in principle adequately covers the existing competence levels within the European educational systems. Eight levels are sufficiently differentiated, whilst much more levels would create unnecessary complexity. However, it must be clearly stated that not each level necessarily corresponds to an existing qualification in every country, educational or professional sector.

ESIB is concerned that the levels 6 to 8 of the proposed EQF may be understood as specifically designated to higher education due to their present definition. This could lead to an implementation of the EQF where HE is strictly hierarchical positioned above VET, which would be assigned to levels up to 5. This would completely undermine the possible benefits of an EQF, i.e. offering learners from a VET background to have their competences recognised also within HE. It must be prohibited that the levels 6 to 8 are understood as exclusively designated to higher education qualifications. Therefore, the formulation of their descriptors have to be carefully reconsidered to cover the broad range of different possible qualifications at those level, both such in higher education as well as in other sectors, including professional qualifications.

With regard to higher education, ESIB stresses the necessity of a level which serves as a common entry point for undergraduate higher education programmes. Potential students must have the possibility to have competences recognised to reach this entry level, no matter where those were gained, e.g. in secondary education, VET or even in a non-formal way. ESIB stresses the need to widen access to higher education programmes to a broader range of people, in particular those with non-traditional paths towards higher education. Either level 3 or level 4 of the EQF could easily serve as an entry level to higher education.

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

It should be more clearly pointed out that the different levels of the EQF must not be regarded as stairs, implying that degrees at different EQF levels can only be reached on a level by level basis. Moreover, it is possible that in particular learning settings e.g. level 3 builds the entrance level whereas the qualification reached by the programme is aligned to level 6.

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

Table 2 of the consultation document is regarded critical by several actors, who raise concerns that it refers to input descriptors rather than outcome descriptors. Indeed, table 2 presents input descriptors of possible programmes leading to EQF levels. The proposed descriptions of levels 6 to 8 in table 2 e.g. strongly limit those levels to the higher education sector. Table 2 would prevent a flexible use of the EQF and a flexible alignment of national qualifications to EQF levels. ESIB is concerned that the paradigm shift towards learning outcomes is undermined. ESIB therefore proposes to remove table 2.

### *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?**

The development of NQFs will be the biggest challenge for those countries where no qualifications framework is in place at all yet. ESIB regards as the most important prerequisite for a successful development of a NQF the mutual co-operation of stakeholders and governmental institutions from all educational sectors already at an early stage. ESIB rejects the approach to first develop a NQF for one educational sector, e.g. higher education, isolated from other sectors and to develop a comprehensive framework only as a second step. This approach jeopardises a central aim of qualifications frameworks, overcoming the traditional borders between the educational sectors.

In those countries, where (a) framework(s) is/are already in place, their compatibility with the principles of the EQF has to be checked and they have to be aligned to the EQF. This procedure may lead to necessary adjustments of the respective national framework. If there is no comprehensive framework covering all the educational system in a country yet, the most important step is to integrate the (several) framework(s) into a comprehensive national framework, which is in line with the principles of the EQF.

When national frameworks are developed a comprehensive credit system, as pointed out above, has to be developed as well. It is further likely that - when developing a national framework - credit ranges are assigned to different levels. However, this must not happen in a too strict manner which hampers flexibility. This must also not mean that credits are assigned to a specific level when they are obtained. The development of national frameworks must not be a vehicle to impose new restrictions or access barriers at all.

Whatever steps are necessary for particular countries, a key prerequisite for a successful setup and implementation of a NQF is the involvement of all relevant stakeholders from all educational sectors covered. "Relevant stakeholders" here refers to governmental institutions, providers and learners in the respective sectors as well as the social partners.

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

ESIB stresses that a "learning outcome approach" can not be regarded as implemented just by an outcome-based NQF being in place. Furthermore, the outcomes approach must be broadly accepted and understood by all stakeholders; it must be reality at institutional level. This implies that, in addition to a NQF, also other instruments must be in place. These are in particular the European Credit Transfer and Accumulation System (ECTS), a clear system for the recognition of prior learning, easy possibilities for mobility between different sectors of the educational system and the use of a learning outcomes approach in programme development. The EQF together with the respective NQF can ease the application of these instruments, but not replace them.

*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?**

A climate of mutual trust between different countries and different institutions is a key condition for the success of the EQF. The possible benefits, outlined above as well as in the Commissions consultation document, can only be reached if involved actors trust each other, e.g. when it comes to the alignment of qualifications to specific levels.

However, mutual trust can be catalysed by setting up a fair, non-bureaucratic and broadly accepted self-certification procedure. If the big majority of countries sticks to a voluntary self-certification, this contributes to building greater trust.

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

The several qualification frameworks emerging can become a reference in quality assurance. If quality assurance procedures take into account the outcomes as defined in the EQF, a NQF or a sectoral QF, programmes can be assured in terms of leading to the respective competences. This may increase trust and – by that – recognition of qualifications in the long-run; in addition to a self-certification procedure.

### **Regarding compatibility of the proposed EQF with the Qualification Framework for the European Higher Education Area (EHEA-QF):**

The two frameworks are both meta-frameworks (“frameworks of frameworks”) and in so far compatible in their basic structure. However, there are different scopes and aims: Whilst the EHEA-QF only covers the higher education sector and aims to relate higher education qualifications to each other, the EQF covers all sectors of education and thus in particular relates qualifications from different sectors to each other. In terms of aims the EHEA-QF and the EQF are complementary. Maintaining this complementarity is crucial for the European higher education systems and requires a genuine involvement of the countries participating in the Bologna Process and its structures on European level in the further development and maintaining of an EQF.

Regarding the level structure, the two frameworks are compatible. The three cycles of the EHEA-QF can be aligned to the levels 6 to 8 of the EQF. However, it is important to have in mind that levels 6 to 8 of the EQF can not exclusively be reached by the Bologna cycles, but also by qualifications from other sectors of the educational system. The current descriptors of level 6 to 8 differ in content from the Dublin descriptors, i.e. they are broader than the Dublin descriptors. This important difference reflects that the Bologna cycles are only some of the many possible qualifications which may be aligned to levels 6 to 8.

Furthermore, there is a difference in geographical scope: Whereas the EHEA-QF covers 45 Bologna signatory countries, the EQF aims to cover 25 EU member states plus 7 additional countries. ESIB stresses that it must be ensured, that the non-SOCRATES Bologna countries must also be able to benefit from an EQF and connected measures. Thus, adequate support must be in place for all Bologna countries which aim to implement an

EQF-compatible National Qualifications Framework and/or a credit system for lifelong learning.

ESIB points out that a consequent application of the outcome approach is crucial for an EQF, both to achieve more possibility of mobility between different sectors of education and to be compatible with the QF for the European Higher Education Area. Furthermore, all relevant stakeholders (i.e. governments, education institutions, students and the social partners) must be completely involved in the following process of establishing an EQF to reach broad ownership and support. We therefore call upon the European Commission to involve ESIB as well as the other stakeholders in the upcoming work.

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