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?

They 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.

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

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.
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 separate system of levels and descriptors. It therefore needs to be kept as simple as possible, allowing national frameworks to deal with detail.

The reference levels and descriptors

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

They appear to be appropriate. However, there is considerable complexity in existing systems and an attempt to capture all these elements could make the Framework too complicated.

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

Yes – but see above.

- 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?

Within Wales we currently have an eight level system with most qualifications described with learning outcomes.

 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?

We have already adopted and developed the Credit and Qualification Framework for Wales (CQFW) which broadly reflect the aims and objectives of the EQF. There is also a National Qualifications Framework (NQF) which covers three countries of the UK. On that basis, we do not foresee any major difficulties in articulation with the EQF meta framework, but further development of CQFW and the NQF (in particular, the proposals for a Framework for Achievement) may impact on this.

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

 Already adopted and the basis for informal and non-formal learning to be adopted into the CQFW.

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?

 From our experience, within the CQFW, the Sector Skills Council and other national bodies such as Care Council for Wales, Health Profession Wales and Police in Wales have found the CQFW an invaluable staring 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.

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?

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.
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 (the CQFW has already been ten years in development and is not yet complete)

Response from the Welsh Assembly Government, UK.