

Consultation process on EQF

FEANI's comments (Engineers)

1. 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?

The role of the EQF as a meta-framework and reference point for national and/or sectoral qualifications frameworks is perfectly outlined in the Commission's document.

The objective is not for equating actual qualifications between EU Member States but to ease the understanding of the qualifications of a person in order to facilitate the mobility.

EQF can have a valuable function in stimulating the development of appropriate frameworks in those countries which do not have them.

It can also help to establish shared and transparent referential between providers, learners, job seekers, employers, employment agencies and professional recruiters.

If supported by adequate assessment (e-based) tools and lifelong learning 'certificates' summarized in a kind of EQF / EURORECORD, it will stimulate mobility (geographical and occupational) and help develop and promote a sound basis for recognized lifelong learning not only across Europe but also across employers, in line with the Lisbon objectives.

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

Such similar models are already used internally by big multinational companies since decades (example : the Haygroup model implemented in most of Fortune 500 companies), so it is proven that such models are workable inside a company even with more than 8 levels and several dimensions as :

KNOW HOW

Specialized and Technical Know How (8 levels)

Managerial Skills (planning, organising and integrating) (5 levels)

Human Relations Skills (3 levels)

PROBLEM SOLVING

Thinking Environment (8 levels) → CREATIVITY

Thinking Challenge (5 levels)

ACCOUNTABILITY

Freedom to Act (10 levels) → ENTREPRENEURSHIP

Impact on End Results (4 levels)

Magnitude of the Impact (6 levels)

In the EQF, only the KNOW HOW learning outcomes are included, it is then not consolidating all the learners lifelong assets, competencies and experiences.

We think that the development of a workable credit accumulation and transfer system clearly linked to learning outcomes is workable and it is then possible to consolidate, measure (quantitatively and qualitatively) and to summarize all the learners assets and competences on a standardized way (using ECTS, ECVET or others new indicators).

A new tool (e-based) as "Professional Card" (as referred in the Directive 2005/32 on Recognition of professional Qualifications) should be created for that purpose by sector/profession.

An EQF supported by Professional Card will be of enormous value to the labour market insofar as it can provide greater transparency and comparability in the development of competence and qualifications of individuals and recognizing all the lifelong learning outcomes accumulated by previous experiences.

EQF should be extensively promoted to the key potential users of the system : the learners and the employers in order that they are fully aware and knowledgeable for them. It should become a European standard and should be made attractive and described in a simple language easily understood also by ordinary citizens.

2. The reference levels and descriptors:

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

It is possible to envisage frameworks with more levels and to duplicate the level 7 in order to consider also learners having several master degrees in different disciplines (engineering and business administration, law and economy, engineering and medicine, science and philosophy,.....). But the big challenge will be to create a model with 8 references levels and descriptors which are sufficiently generic to encompass the national qualification systems.

Anyway, an 8 level framework grasps well the complexity and is more or less in line with the ISCED classification of UNESCO, the BOLOGNA Declaration, the DUBLIN Descriptors/split of level according to Bologna and BERGEN higher education structure, but not with the 5 levels of the new Directive 2005/36 that mixes levels 6, 7 and 8 together and which is the key formal framework for the 'de jure' mobility to countries regulating a profession.

What is however missing is a clear rationale to link the EQF – 8 levels learning outcomes and the 8 KEY COMPETENCES FOR LIFELONG LEARNING - A European Reference Framework mentioned in the Proposal for a Recommendation of the European Parliament and of the Council (Document COM(2005)xxx.) :

1. Mother Tongue / 2. Foreign languages / 3. Mathematical + basic Science and Technology / 4. Digital Competence / 5. Learning to learn / 6. Interpersonal, Intercultural, Social and Civic Competencies / 7. Entrepreneurship and 8. Cultural expression.

As all those competencies are mandatory for implementing the Lisbon strategy, they would also be, for consistency reasons, an integrated part of the EQF.

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

Despite the fact that the language is sometimes high level, esoteric and complex for ordinary citizens and that some overlaps have been identified between levels, generally the descriptors capture well (taking into account the remarks mentioned above concerning Problem Solving and Accountability) the learning outcomes.

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

The phrasing of the content suffers from the same problems mentioned concerning table 1.

But additionally and based on the results of an intensive pan-European study (joined in appendix) FEANI has launched this year concerning the profession of engineers in EU and the associated training levels and regulations, we disagree partially concerning the links made at level 7 with the Bologna Master diploma and the access to the qualifications offered thanks to this level.

In the majority of the MS countries, the Master level is absolutely not limited (as it is the case in the Anglo Saxon education system) to offer access to very specialized related field.

The second cycle of qualifications in higher education open access and is, in most of the case, a minimum prerequisite to access most of the (high level) management positions.

It is clear that management capabilities are primarily a matter of personality and individual disposition and not of education, but the level and the complexity of skills mandatory to manage successfully (economy, strategic planning and forecasting, risk management,...) can be acquired at Master level or also via postgraduate courses (MBA, CPD – Continuous Professional Development).

In the countries regulating the profession of engineer, a Bachelor level is even not accepted to be recognized as a full engineer (second level signature power, restricted reserved activities and limited rights).

This is not limited to engineers but is also valid for all high level positions in every sector.

So, we recommend to update the description of Level 5, Level 6 and Level 7 accordingly.

To resume, in the MS Countries regulating the profession and/or the education of engineers, the situation today is as follow :

Level 5 (Technicians) opens not really access to management position but to more administration, control or supervision position (Agent de Maîtrise).

Level 6 (Bachelor) open initially access to first level management position (management of technicians or junior engineers) and,

And Level 7 (Master) to medium and high level management positions.

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

To be answered at a National level by the FEANI National organisation as this cannot be consolidated at European level due to the large diversity of education systems (see FEANI report attached)

3. National Qualifications Frameworks

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

To be answered at a National level by the FEANI National organisation as this cannot be consolidated at European level due to the large diversity of education systems (see FEANI report attached)

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

To be answered at a National level by the FEANI National organisation as this cannot be consolidated at European level due to the large diversity of education systems (see FEANI report attached)

4. Sectoral Qualifications

To what 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?

EQF is a good standardized framework that could be customized at a pan-European sectoral level.

The advantage to exist as a framework on one side and to be an universal meta-model on the other side is a catalyst by itself for dissemination at sectoral level.

5. 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?

EQF must be complemented and supported by an European Accreditation System. Quality assurance process and quality controls must be put also in place at European level (see how in the proposal for the EUR-ACE framework for accreditation of engineering education on www.feani.org).

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

Through an agreement on principles of quality assurance, building on some of the work already done in regard to higher education through EUR ACE (for engineers). It must be stressed that the emphasis should be on developing accepted principles rather than trying to harmonise QA processes (see www.feani.org).