



The National Unions of Students in Europe

Policy paper

Qualifications Frameworks

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Preamble

ESIB – The National Unions of Students in Europe has existed since 1982 to promote the educational, social, economic and cultural interests of students at the European level, and towards all relevant organisations and institutions. ESIB currently has 50 member organisations from 37 countries.

I. Introduction

ESIB in principle welcomes the idea of developing national qualifications frameworks as well as a European qualifications framework in the course of the Bologna Process. The biggest advantage that ESIB sees at the moment is the achievement of greater social cohesion and the support such frameworks can provide towards a system that is based on learning outcomes and the implied shift from a teaching based system to a learning based system. ESIB does not regard qualifications frameworks as the only means to achieve this shift of paradigms but also considers other tools such as ECTS as tools to achieve that end. However, ESIB considers the use of learning outcomes in qualifications frameworks as a *conditio sine qua non* for their development and implementation. It is essential that learning outcomes are set in such a way that they reflect all major purposes of education. These major purposes are (without any priorities implied by the order):

- Personal development
- Preparation for a life as an active, constructive and critical citizen in a democratic society
- Maintenance and improvement of an advanced knowledge base
- Preparation for the labour market with a sustainable, long-term perspective

ESIB does not regard qualifications frameworks as the universal panacea for all problems that still exist in relation to making degrees more readable, comparable and compatible within the EHEA. Qualifications frameworks have to be seen as an additional element to all the other tools that need to be put in place according to the objectives set in the Bologna process. Qualifications frameworks will only provide an added value if these other tools are implemented properly, in particular ECTS, the Diploma Supplement, systems for quality assurance and the necessary elements required through the Lisbon Recognition Convention.

II. Student participation

Students need to be involved in all activities (inter alia policy making, implementation and evaluation) at all levels relevant to higher education. Therefore students also have to be a full partner in all activities relating to the development, review, maintenance and further improvement of qualifications frameworks. ESIB stresses that only qualifications frameworks that put students in the centre and their interests as the central element will provide a positive impact on the establishment of the EHEA. ESIB has been following all developments regarding qualifications framework at European level, closely and actively. Not least because of this ESIB is represented in all relevant groups at European level that deal with qualifications frameworks. This involvement needs to be maintained and ESIB calls upon all relevant actors to ensure this. Furthermore ESIB calls on all governments and stakeholders at national level to involve student representatives in setting up and maintaining their national qualifications frameworks. ESIB also stresses that students have to be involved in establishing learning outcomes, be they of generic or subject specific nature.

ESIB stresses that in addition to the involvement of students also the involvement of HEIs is necessary. Only if the entire academic community is involved in the development of a qualifications framework and thus a bottom-up approach is applied, their full acceptance can be ensured. A rigid top-down approach hampers the feeling of ownership and will consequently lead to opposition in applying elements of the qualifications framework at institutional level or their improper implementation.

III. Aims and purposes of qualifications frameworks

Qualifications frameworks can fulfil a variety of purposes and aims. These can be of more structural nature, i.e. facilitating the compatibility and comparability of degrees. But they can also be used in such a way that they support transition in and access to various fields of education and learning. ESIB calls on those developing qualifications frameworks to consider carefully what they want to use the qualifications framework for and to make full use of the benefits qualifications frameworks can bring. ESIB sees a major benefit of qualifications frameworks in providing a bridging element between traditional HE and lifelong learning (LLL). In this way qualifications frameworks can foster social cohesion and ease access to HE for non-traditional learners. ESIB also sees a major advantage of qualifications frameworks in facilitating mobility between different sectors of education. This both applies to facilitating transition from and access to polytechnic to university education and vice versa as well as from vocational education and training (VET) to HE and vice versa. It finally is the combination of the impacts on structures and pathways that make qualifications frameworks worthwhile. ESIB stresses that the development of national qualifications frameworks must not be used to incorporate regulatory aspects that have not been in place before, especially with regards to admission criteria for a higher level of education. Such an approach would only undermine the acceptance and thus the envisaged benefits of qualifications frameworks.

IV. Cycles, levels and credits

ESIB considers the use of cycles in qualifications frameworks as a necessary element to make the European degree structures more comparable and compatible. Therefore ESIB stresses that qualifications frameworks need to include a cycle for the first, second and third cycle. These cycles can be understood as levels within the qualifications frameworks. Another level that needs to be included is in relation to tertiary short-cycle qualifications. Millions of students are enrolled in these kind of programmes and the inclusion of a separate level for this type of education will provide for better possibilities to progress further in the educational systems.

ESIB also stresses that it is important to include at least one level before the entrance to HE both for recognition and mobility purposes and in order to facilitate access to HE for people without the final school leaving certificate. Whilst it might not be necessary at the national level, it is crucial for the European level, as it will foster mobility already for the first cycle. Despite the regulations of the Lisbon Recognition Convention the recognition of school leaving qualifications currently remains problematic, just as much as for the other cycles. By including this level in qualifications frameworks also the access to HE of learners without the highest school leaving certificate can be improved.

ESIB does not see any need for further distinctions regarding HE and LLL at European level and therefore is in favour of 5 levels for the overarching qualifications framework for the EHEA. Further distinctions can be done at national level. However, ESIB stresses that linking levels to years of study does not provide any benefit, but rather hampers flexibility.

Credits have to be part of qualifications frameworks. As ECTS is the credit system that is being used in the majority of European countries, ESIB is in favour of an ECTS based European qualifications framework as well as ECTS based national qualifications frameworks. ECTS needs to be applied using learning outcomes and workload. ESIB stresses that there is no contradiction in using ECTS based on workload and applying the concept of learning outcomes at the same time. The use of workload is crucial for students and can also be understood as a tool for assuring quality by preventing overloaded curricula.

ESIB does not see any advantage in linking credits to levels. Strictly linking credits to levels will rather decrease the flexibility a credit system can actually provide. ESIB however reiterates that the use of ECTS as an accumulation system does of course not mean that a complete supermarket or a la carte approach is advisable. There are various other ways than linking credits to levels in order to ensure that study programmes are meaningful. The use of subject benchmarks can be seen as one option. ECTS is merely a system for quantitative measuring and must not evolve in a system that also makes qualitative distinctions.

In the development of the qualifications framework for HE the developments in the VET sector have to be taken into account and vice versa. This especially refers to the alignment of the cycles / levels with the reference levels developed in VET for the purposes of the comprehensive framework covering both VET and HE, as well as the issue of credits.

V. Qualifications frameworks, transparency instruments and recognition

ESIB stresses that qualifications frameworks cannot cater for all the purposes of transparency and recognition instruments and therefore cannot replace them. Qualifications framework only provide an added value in addition to them. ESIB stresses furthermore that currently the various transparency and recognition tools such as ECTS, the Diploma Supplement, and means to ensure the application of the Lisbon Recognition Convention etc. are still weakly and/or improperly implemented at a wide scale of HEIs and countries in Europe. This situation must be resolved and the development of qualifications frameworks must not lead to neglecting the poor status of implementation of the other tools. ESIB therefore calls on governments and HEIs to finalise the implementation of these other tools in a proper way and not to put them aside because the use of qualifications frameworks would not demand it any more. ESIB also considers the Diploma Supplement as a much better tool to describe the profile of a qualification than it can be done with qualifications frameworks.

ESIB stresses that competences are not only acquired in formal education. In order to achieve a system in which the competences of students are seen as the central element it is therefore crucial to provide for possibilities to recognise learning outcomes in the form of competences that were obtained in other areas than formal HE. Qualifications frameworks must take this into account and therefore especially a system for the accreditation of prior experiential learning (APEL) needs to be put in place. ESIB however believes that the recognition of competences from outside of HE does not necessarily lead to the award of a degree even in cases where all learning outcomes of a study programme were obtained. The sum of learning outcomes is not necessarily also identical with the overall programme outcomes. The relevant awarding body has to take account of this.

The French system of “validation des acquis de l’ expériences” (VAE)¹ provides in the view of ESIB fair opportunities for recognising competences obtained in the workplace and outside formal education. Therefore ESIB considers VAE as a good starting point for APEL. However, it is important that such a system needs to be applicable for all cycles and also recognises competences that have been acquired in different countries.

VI. Alignment of national qualifications frameworks to the European qualifications framework

The use of qualifications frameworks throughout Europe implies that some degree of coherence is vital. This coherence needs to be assured by using the elements that were agreed to be used, namely learning outcomes and competences, workload, profile and levels in every national qualifications framework. This coherence must not reduce the diversity and pluralism of disciplines and delivery. The European qualifications framework needs to be seen as a framework of frameworks and is merely descriptive. Therefore

¹ A good overview of the system can be found at:
<http://www.centre-info.fr/maq100901/anglais/system/systemVae.htm>

national qualifications frameworks need to be in line with the European one. However, this does not imply that national qualifications frameworks that are being developed after the European qualifications frameworks will have been set up must limit themselves to be coherent to the European one. The European qualifications framework only had a basis of a few national frameworks and is being developed according to their characteristics. Qualifications frameworks as such must not be static but rather continuously adjusted and improved. This also applies to the European qualifications framework.

VII. Ownership and further development of the European qualifications framework

ESIB considers the European qualifications framework not as the property of governments of signatory countries of the Bologna Process. Such a view would juxtapose the underlying partnership attitude of the Bologna Process. However, ESIB does not consider the question of formal ownership as important but rather the question of who is going to take care of its further refinements and adjustments. ESIB stresses that it is crucial that students as well as HEIs are going to be part of any such work, whether it will be under the auspices of the Bologna Follow-Up Group and its potential successor, an expert advisory body or even a special body created for these purposes.

VIII. Qualifications frameworks in Bologna, Copenhagen and Lisbon processes

ESIB regards the establishment of qualifications frameworks for the EHEA (Bologna Process) and the one for VET (Copenhagen Process) as complementary and believes that these have to be linked in order to achieve a greater added value. Bringing the two frameworks together will help in overcoming the traditional and artificial believe that HE is superior to VET. Only through the merger of these two frameworks it will be possible to achieve a greater level of social cohesion and facilitate access for non-traditional learners to HE. Therefore ESIB generally welcomes the initiative of the European Commission to bring them together as part of the Lisbon strategy. However, ESIB reiterates that the objectives of the Lisbon strategy are not identical with those of the Bologna and Copenhagen processes. Especially the Bologna Process has a much wider geographical and political scope than the Lisbon strategy. Not least because of this, ESIB also expresses its concern that the European Commission considers the Lisbon strategy as the umbrella of the Bologna and Copenhagen processes. Whilst it might be more the case with the Copenhagen Process, given its geographical coverage and also regarding the legal competences of the European Commission, it is not the case with the Bologna Process. Nevertheless, ESIB calls on the European Commission, as it views the Bologna Process as part of the Lisbon strategy to also incorporate the underlying principles of the Bologna Process in its work with the Lisbon objectives. In particular, ESIB call for an increase of student participation and demands that this is being reflected in the work of the European Commission. Students have to be represented in all initiatives and working groups that have an effect on students. ESIB also stresses that more transparency is needed in the European Commission's work on the Lisbon strategy. ESIB stresses that the comprehensive European qualifications framework needs to be useful for all signatory

countries of the Bologna Process. Therefore it must not be limited to EU and associated countries, despite it is part of the European Commission's work under the Lisbon strategy.

ESIB emphasises that the creation of comprehensive national qualifications frameworks takes more time than only developing one for HE. However, in the long run, it is easier than bringing two frameworks together. It is much more likely that such an approach will gain the acceptance of both sectors. ESIB also stresses that the underlying principle in the creation of such frameworks is an equal representation of stakeholders from both VET and HE.

IX. Conclusion

ESIB welcomes the creation of a comprehensive ECTS based qualifications framework covering both HE and VET and the entry qualifications for the two sectors. Any efforts in this direction must put the students' interests in the centre. Only such an approach will provide an added value for the EHEA. ESIB stresses that the work on qualifications frameworks must not be limited to discussion of a small circle of experts. Much greater efforts are needed to allow all stakeholders in all signatory countries of the Bologna Process to contribute to the discussions and to shape qualifications frameworks in such a way that they reflect the interests of all of them and not just the privileged few that have been dealing with the issue for a longer time. European initiatives must also have a European basis of discussion and work. The creation of a comprehensive European qualifications framework takes time and it should take time, as it is a complex endeavour. Comprehensive qualifications frameworks can help in achieving the objectives of almost all Bologna action lines. However, they are not the universal panacea. The creation of qualifications frameworks is an additional task and must not lead to lowering efforts regarding any of the other objectives, aims and tools of the Bologna Process. The creation of qualifications frameworks also requires additional money that governments must be willing to invest. Students have to be a full partner in all activities connected to the creation of both national qualifications frameworks and the European qualifications framework, just like with any initiative regarding education. ESIB also emphasises again that students are willing and capable to contribute significantly to any work that leads to the EHEA. ESIB stresses again that the EHEA must be developed for and with students.

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