



**The ETUCE Executive Board Position on
the European Commission Staff Working Document:**

Towards a European Qualifications Framework for Lifelong Learning

Adopted in their meeting on 6-7 December 2005

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ETUCE supports the creation of an EQF, but calls for improvements in several respects

ETUCE supports the general idea of creating a European Qualifications Framework (EQF) with its objective of facilitating mutual recognition of qualifications across national borders, notably the efforts to ensure that teachers – and workers in general – are able to undertake a course of study or obtain a job in another EU Member State at a level adequate to their qualifications.

ETUCE equally supports that the EQF seeks to promote the recognition of competences obtained in non-formal and in-formal learning settings, in particular the call for Member States to develop accreditation systems for the validation of non-formal and informal learning. ETUCE welcomes that the EQF aims to build bridges within education systems, attempting to facilitate transfer between vocational education and training and general education, and vice versa, as well as the aim to build bridges between learning in work places and the education system.

ETUCE appreciates that the development and future implementation of an EQF is part of efforts to upgrade the value of engaging in learning activities. The EQF's focus on the importance of continuous professional development can in this connection also bring positive changes with regard to ensuring continuous professional development for teachers. ETUCE moreover welcomes that the EQF forms part of efforts to promote the social cohesion and employment-related strands of the Lisbon Strategy.

A need to clarify the purpose and the ambition of the EQF: the real challenges lie in creating National Qualifications Frameworks

ETUCE stresses that the real challenges lie in developing National Qualifications Frameworks (NQF), without these the EQF will have no effect. In advance of the Commission's formal proposal for an EQF, ETUCE considers that it is important to clarify the purpose and ambition of the EQF: The EQF should be a practical tool for comparing the qualifications certified by national authorities, which a citizen holds. As such the EQF can serve to promote mobility in the EU, but the wider aims of promoting equal access to learning opportunities and promoting validation of competences gained in non-formal and informal learning settings, will only be achieved if complementary measures are taken at national level. In progressing with establishing the EQF, it must be recognised that these challenges remain to be faced and call for comprehensive and multifaceted policy measures at national level.

ETUCE emphasises that a focus on the value of non-formal and informal learning settings must never reduce the focus on the paramount importance of attaining a high level of initial education.

There is an overall need to thoroughly clarify the glossary and terminology in the EQF, it must be ensured that the terms are interpreted in the same way in different countries. Many of the key terms, e.g. qualifications and certifications, carry different meanings in different languages, and often also have multiple meanings within the same language.

The EQF must strike a balance whereby it achieves a convergence of national qualifications systems but without leading to a standardisation of systems. In particular, the EQF's focus on learning outcomes must in no way lead to a standardisation of national curricula. ETUCE highlights that it is precarious to place national and sectoral qualifications frameworks on the same level, such as to some extent is done in the Commission's outline of the EQF. Each sectoral framework should be evenly balanced within the national framework, ensuring that no sectoral framework takes precedence or dominates other sectoral frameworks.

On a general note, ETUCE highlights that sufficient time must be allocated to further develop the design of the EQF, and to properly analyse its effects and implications. In order to achieve a flexible framework, the EQF must be designed in a form that allows future changes to its structure.

ETUCE regards the EQF as most importantly a tool for mobility. Any other aims of the EQF should be clearly identified and discussed in the process ahead.

The 8 common reference levels on learning outcomes represents a limited outlook on qualifications: more work needed

ETUCE notes that the focus on *learning outcomes* follows current trends in the establishment of qualifications frameworks at national level. However, the definitions of learning outcomes, whether in terms of knowledge, skills, or wider personal and professional competences, are not entirely consistent with current educational research on learning and pedagogy. ETUCE stresses that further work should be undertaken to ensure that the definitions of learning outcomes represents an understandable and accepted approach drawing on different notions of learning existing in the various cultural traditions of Europe.

The definitions and categorisations relating to 'personal and professional competence' are particularly problematic, and should either be substantially further developed or deleted from the EQF. Considering the difference in cultural connotations and value granted to the definitions employed to describe the eight levels of the 'personal and professional competence' bloc, it seems most pertinent that these aspects are only part of National Qualifications Frameworks, but not the EQF.

ETUCE finds that the EQF is limiting the outlook on qualifications by only allowing for a horizontal use of the 8 levels in table 1. A given qualification is rather reflected by a zig-zag perspective, where a qualification obtained relates to different levels in respectively the knowledge, skills, and professional and personal competence bloc of

the EQF levels. For example, many adult learners with basic knowledge (level 1-2) indeed take responsibility for own learning and take responsibility for self-understanding and behaviour (level 3). Moreover, the professional and vocational competence defined as to “promote social and ethical advancement through action” is only granted to qualifications in level 8 (doctoral level), but indeed this competence is a crucial aspect of the teaching profession, which in most countries otherwise would be defined as level 7 in terms of the knowledge and skills aspects of the EQF.

ETUCE emphasises that it is an asset of national school curricula that they encompass the objective of seeking the highest possible development of all individuals’ social and personal skills. The EQF levels describing the learning outcomes expected after completion of compulsory schooling are in comparison insufficient regarding the level of personal and social competences individuals are expected to have achieved.

ETUCE finds that table 2 supplying “supporting information about the levels in the EQF” should only be *supporting* information, and left out of the final proposal for an EQF in order to respect the cultural diversity of education and training systems. The information in table 2 does not sufficiently take into account the variety of education and training systems in the EU.

The Framework of Qualifications in the European Higher Education Area

In the light of the Framework of Qualifications adopted as part of the Bologna Process in May 2005 at the Bologna Ministerial meeting, ETUCE finds that there in the EU should be one framework covering primary, secondary and tertiary education, integrating the Bologna Framework into the EQF, thus achieving one single, simple and combined framework.

Social partners have a crucial role to play in the future implementation

ETUCE stresses that social partners have a crucial role to play in the development of national qualifications frameworks and in the implementation of the EQF. All social partners must be consulted, and the Commission’s proposal for an EQF should contain clear recommendations on the importance of involving social partners at both national and European level.

ETUCE believes that the EQF should be under the responsibility of the Ministries of Education, while cooperation between relevant ministries should be promoted. Quality assurance of the implementation of the EQF must be undertaken by public authorities or public accredited quality assurance agencies.

In relation to the future implementation, it should be ensured that national traditions are fully respected. The EQF should be developed so as to accommodate the national qualifications frameworks, not the reverse, and the EQF must be sufficiently flexible to accommodate those national qualifications frameworks that remain to be developed.

Finally, ETUCE stresses that the future proposal for a EQF should contain provisions for a thorough evaluation of the EQF after a first period of utilisation.