



ETUCE Position Paper on the proposal for a recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning (COM(2006)479)

**Adopted by the Executive Board
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The ETUCE Executive Board adopted in December 2005 a statement in contribution to the Europe-wide consultation process held on an outline of the EQF in the second half of 2005. In response to the formal recommendation for an EQF set forward by the Commission on 5 September 2006, ETUCE wishes to bring forward the following points:

ETUCE confirms its support for the idea behind establishing an EQF and its aim of promoting mobility, lifelong learning, and recognition of competences acquired in non-formal and informal learning settings. ETUCE reiterates that it is important to maintain a clear outlook on what respectively the EQF and the National Qualifications Frameworks (NQFs) can do: the main function of the EQF will be to promote mobility, while the aims of promoting lifelong learning and recognition of non-formal and informal learning need comprehensive policy strategies at national level, alongside the development of NQFs where appropriate.

Although ETUCE notes improvements in comparison to the outline of the EQF presented in 2005, a number of concerns remain.

The EQF descriptors

The link between the Bologna Framework of Qualifications and the EQF is still unclear. ETUCE notes that the recommendation explicitly states that the two qualification frameworks are compatible (p. 14), but documentation for the claimed compatibility is missing. Existing levels of compatibility should be documented in a Commission explanatory note, and the measures proposed to strengthen compatibility should be set out more specifically.

It is not clear how high-level qualifications within Vocational Education and Training will rank in comparison to qualifications achieved within Higher Education. As it stands now, ETUCE in principle regards the frameworks as two separate frameworks - the EQF and the Bologna Framework. The consequences of having two different frameworks must be analysed. The existence of two different frameworks will be very difficult to explain to users, institutions and society at large.

The simplification of the descriptors in the third category of 'learning outcomes' regarding personal competences is welcomed. The category now describes competences in terms of responsibility and autonomy in relation to study and/or work situations. However, this narrowing of the competence category should be explicit throughout the text. Accordingly, the wording "competence is described in terms of responsibility and autonomy" (p. 17 and annex I) should be supplemented by "in relation to study and/or work situations".

The referencing of a given qualification to the EQF still seems to lack flexibility. The three categories of learning outcomes can only be related to a given qualification in a horizontal manner, as a qualification can only be ascribed to one level on the EQF as a whole. This presupposes that a low level of learning outcome in terms of knowledge and skills necessarily goes hand in hand with a low level of learning outcome in terms of competences, i.e. responsibility and autonomy. ETUCE acknowledges the complexity of developing a tool such as the EQF, but reminds that the EQF levels must reflect the reality; otherwise it will not be used in practice.

It might also be worth clarifying that the fact that the EQF contains rather basic levels of learning outcomes (level 1-3) do not signify that such levels should be recognised as a professional qualification in Member States, where this is not the case today. The question of whether a qualification ascribed to a given EQF level gives access to further education or gives the right to exercise a profession is strictly a national matter.

Ensuring the diversity of education and training systems in the EU

The diverse systems of education and training in the EU are a real asset and should be maintained. As is also recognised in the draft recommendation, the diversity of the education systems and the way in which they are embedded in the different labour market systems enables rapid adjustments to changes in skills needs. ETUCE finds that the introductory text of the recommendation for an EQF (p. 3) should also contain a reference to the cultural and social assets of maintaining diverse education systems. If education systems are only assessed from the point of view of labour market needs in a global perspective, there is a real danger that the diversity of education systems would be considered an obstacle rather than an asset.

ETUCE strongly supports the diversity of the education systems in the EU and stresses that there is a need at all levels to ensure that the EQF and the creation of national qualifications frameworks will not lead to a process of harmonisation of the structure of the education systems. In particular, it must be ensured that the design of the EQF will not play too dominant a role in the development of NQFs. Considering that the recommendation to establish NQFs, where appropriate, is part of the added value of the EQF, the NQFs must first and foremost serve the national context and the national objectives, the specific needs at national level in terms of promoting lifelong learning and the recognition of non-formal and informal learning. The linking of the NQFs to the EQF is important but should be secondary to these national processes.

Equally, the development of NQFs must in no way lead to a utilitarian approach to the national education systems, in which the education system is merely tailored to the needs of the labour market. While educating a country's citizens to the labour market evidently is a crucial function of the national education system, it must be remembered that education and training systems serve a wide range of social, personal, cultural, and democratic purposes in today's society. The development of NQFs must be a practical tool to compare qualifications within a country's education and training system, including qualifications obtained by certifying learning obtained in non-formal and informal settings, but nothing more and nothing less.

Learning outcome approach and credibility

ETUCE finds that the focus on learning outcomes is necessary in the EQF in order to allow international comparisons of qualifications, but stresses that a too overtly recommendation to Member States to focus on learning outcomes in the development of NQFs might risk leading to standardisation and harmonisation. In this light, the sentence (p. 15) “Use an approach based on learning outcomes when defining and describing qualifications (...)” should be changed to: “Use an approach which takes into account learning outcomes when defining and describing qualifications”.

The question of whether a purely learning outcome-based approach could gain credibility needs to be given further consideration. The duration, the content and the institutional setting of a given course of education are evidently of crucial importance. The question is how a purely outcome-based approach will be received in countries which have a long tradition of including access criteria, content, and duration when assessing the level of a given qualification within their national qualifications systems. Would it e.g. be possible to have the same outcome description for teacher education programmes with durations of respectively 3 and 6 years?

Equally, a purely learning outcome-based approach in relation to validation of non-formal and informal learning at national level seems also hypothetical. In France and Belgium, where they have recently further developed their systems and regulations for validation of competences obtained in non-formal and informal settings, the assessment of a person’s competences is supplemented by a jury-evaluation of a portfolio specifying where and during which periods the candidate has obtained his/her competences.¹ In Finland, which together with France is one of the countries with a long tradition of validation of non-formal and informal learning, the validation system involves different categories of competence-based qualifications depending on, among other factors, the number of years of work experience.² In summary, ETUCE acknowledges that a learning outcome-based approach is needed for international comparisons, but stresses that the recommendation for the EQF should recognise that the development of NQFs requires careful consideration of both learning input and output.

While ETUCE fully supports promotion of recognition of informal and non-formal learning, it must be noted that this should not lead to the promotion of fragmented non-formal and informal learning situations taking attention away from the value of acquiring knowledge and skills within a comprehensive formal setting.. Neither should the focus on promotion of non-formal and informal learning lead to a reduction in the focus on the paramount importance of achieving a high level of initial education from the very beginning.

The development of a European Credit Transfer System within Vocational Education and Training (ECVET) has the potential to play a significant role in raising credibility and mutual trust in comparing levels of VET qualifications. However, as the development of the ECVET is merely in a phase of first consultation, ETUCE finds that the recommendation for the EQF must contain a remark that the link between the

¹ Commission Staff Working Document: Annex to the 2006 Joint Council and Commission Progress Report on implementation of Education and Training 2010.

² See the European Inventory for validation of non-formal and informal learning: www.ecotec.com/europeaninventory

ECVET and the EQF is conditional upon the outcome of a political decision on the ECVET. It is precarious, as is done in the draft text, to describe the ECVET as an important initiative, which the EQF should take forward (p. 4), considering that no political debate or dialogue with stakeholders on the design of the ECVET have taken place yet.

Quality assurance

The success of the EQF depends on whether it brings about a greater degree of mutual trust between the Member States. Quality assurance in linking the national qualification systems to the EQF is obviously crucial to establish mutual trust between countries. ETUCE welcomes that the recommendation for the EQF contains principles for quality assurance in annex II, but stresses that there are several problematic aspects. Firstly, it should be made clear that the principles are minimum requirements and that they should be considered subject to further development. Secondly, the principles should not state, as they do in the draft text, that quality assurance should give emphasis to outputs and learning outcomes: if an outcome-based approach in the EQF is to gain credibility, we precisely need the quality assurance mechanisms to give equal emphasis to input, context, process and output dimensions. Thirdly, a wider debate is needed on whether the EQF can really gain credibility without a central coordination agency at EU level for quality assurance in linking NQFs to the EQF. This role is foreseen for the European Qualifications Framework Advisory Group, but it should be debated whether a separate European expert agency should assist the EQF Advisory Group in this work. Fourthly, it should be added in annex II that quality assurance agencies should be underpinned by a public commitment and be reviewed by public authorities.

Sectoral Qualifications Frameworks

ETUCE stresses that sectoral qualifications frameworks should firstly be related to the regional or national qualifications systems or frameworks, and then secondly to the EQF, not the reverse.

Implementation of the EQF

With regard to the implementation of the EQF, ETUCE is pleased to note that a number of demands put forward in the ETUCE statement from December 2005 have been met in the new proposal, including:

- A recommendation to involve national social partners in the work of the national centers designated to coordinate the implementation of the EQF in each country;
- the setting up of a European Qualifications Framework Advisory Group, including representatives of the European social partners, to monitor, coordinate and to ensure the quality and overall coherence of the process of relating national qualifications systems to the European Qualifications Framework;
- an evaluation and possible review of the EQF after a period of 5 years. In relation to this latter point, ETUCE however stresses that evaluation should be undertaken on a regular basis in the EQF Advisory Group, in preparation of an overall evaluation after the first 5 years.

However, ETUCE underlines that the proposed time schedule indicating that Member States shall relate their national qualification systems/frameworks to the EQF by 2009 is too ambitious, and will pose problems in the light of planned reforms in several countries during 2007-2008. In order to ensure a sustainable development of the NQFs, the implementation of the EQF should be embedded in a realistic time schedule. One of the added values of the EQF is precisely that the development of NQFs can bring about coherence in national qualification systems in countries where this is not the case today, but this in turn requires that national authorities are given the time to develop their own national qualification frameworks suitable to their national context, in a dialogue with social partners and other stakeholders, and not just implement a copy of the EQF.

ETUCE emphasises that it is important to ensure that the concepts and definitions embedded in the EQF are understood in the same sense in the different countries. The EQF Advisory Group has an important role to play in this regard.

In addition, ETUCE stresses that the implementation of the EQF must be placed under the responsibility of the Ministers of Education.