
**COMMISSION CONSULTATION ON A
EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING**

CEEMET POSITION

INTRODUCTION

Transparency and comparability vital

CEEMET acknowledges the Commission's consultation document aiming at establishing a "European Qualifications Framework". According to the Commission document, the EQF shall be developed and implemented as a **voluntary meta-framework to increase transparency and support mutual trust**. Its main goals are to enable qualification frameworks and systems at national and sectoral level to be related to each other and thus to facilitate the **transfer and recognition of the qualifications** of individual citizens. However, for CEEMET, and as already stated in previous CEEMET papers and addressed at a joint CEEMET-EMF conference on "Skills Shortages in the Metal Industry" - it is the **transparency and the comparability of occupational qualifications of employees which are more important for the companies**.

Is there truly a need for an EQF?

The Commission derives its mandate for the EQF initiative in particular from a request of the EU Heads of States and Governments in March 2005. In line with the limited mandate of the Community to the Commission rightly highlights the **voluntary** nature of the EQF which **shall not entail any legal obligations**. Even though the EQF initiative shall not result in a binding regulation, the underlying principles of the "better regulation" initiative should apply also here. As is stressed in the Consultation document, the EQF, given its voluntary nature, can **only function properly and achieve its goals if there is a true commitment from all parties involved**. Therefore, a **real need** for setting up an EQF is a precondition for the success of this reading tool. In this latter respect, the Commission Consultation paper might be interpreted in a different way, when it says "*In particular, the stakeholders must be convinced that a European meta-framework is needed*".

Furthermore, CEEMET is of the opinion that a proper pre-consultation of the sectors and not only of the Advisory Committee for Vocational Training, which has no sectoral representation, would have been useful. It is indeed crucial that the needs of the main addressees of the EQF are duly taken into account. CEEMET wonders whether the involvement of government representatives and in particular of vocational and occupational training institutions and universities has been duly balanced by the involvement of the user end, including employers and companies, in the conception and drafting of the EQF. Similarly, we would like to underline the crucial importance of a balanced selection of external experts the Commission will contract to analyse and synthesize the responses to the present consultation

Lack of alignment with Bologna - a key concern

Although CEEMET in principle is in favour of aligning the EQF with the Bologna process, a fundamental difference has to be acknowledged, which is that the EQF is "learning outcome oriented" and that the Bologna process, including the ECTS, is mainly oriented towards "learning inputs". On this particular point, CEEMET would like to underline the importance of the fact that the EQF is geared to **learning outcomes**.

Furthermore, as regards the 8-levels structure, the idea of having same levels for knowledge, skills and competences is felt to be difficult if not impossible to achieve.

Simplicity, clarity and ease of use

To be a successful tool the EQF does not only have to be needs-driven, but it has to be as **transparent and as simple as possible**, avoiding **inappropriate over-detailed requirements**.

Before entering into the detailed comments on the different chapters of the Commission Consultation document, CEEMET emphasizes that a **common understanding of the principal technical terms** used in the Consultation document among all Parties is an indispensable prerequisite for a sustainable tool. In this regard, the Commission has an important role to play. Any such common understanding must, of course, not interfere with national systems or definitions. CEEMET fears that the present Commission consultation document in the different language versions shows important differences as to such principal technical terms.

As is highlighted in the CEEMET "Competitiveness Paper" of October 2004, we consider it useful to foresee an automatic review mechanism, for checking the effectiveness of an EQF once it has been applied for a few years.

While CEEMET agrees that the voluntary European Qualification Framework could become a tool to achieve the above mentioned goals, CEEMET members also believe that to be effective and efficient, a number of changes and clarifications need to be brought to the EQF as presented by the Commission in its consultation paper.

CEEMET COMMENTS ON THE CONSULTATION PAPER CHAPTERS

➤ *On the rationale of a European framework*

CEEMET agrees with the main purposes and functions of the EQF as described in the consultation document. This applies in particular to the EQF's main aim of having a **common, voluntary and non-binding** EU meta-framework as a "**reading tool**" to increase transparency and thus to facilitate the understanding of different national qualifications and their underlying systems. As is laid down in the Consultation document, CEEMET emphasizes the importance that the common reference levels are related to **learning outcomes**. Thus the necessary **geographical and occupational mobility** of workers in Europe could increase.

At European level, however, this aim cannot be achieved via a mechanism of mutual recognition of non-regulated professional qualifications, since national systems that are rooted in different national cultures and traditions show fundamental differences - ranging from vocationally oriented schools to dual systems. Therefore, art. 150 of the EU Treaty gives to Community a limited mandate only, so that the answers to the questions if and how to bring national qualifications frameworks (NQFs) in line with the concept of the EQF (levels) has to be left to the different responsible authorities. Already in the national context, problems with a lack of transparency exist. They are mainly due to differences between national, regional / provincial and company levels in a given country. As a consequence, corresponding structures, in particular NQFs, and thus one important prerequisite for a proper functioning of an EQF does not exist for the time being. In the longer run, however, CEEMET member organisations see the EQF as a catalyst to establish NQFs, where they do not already exist. Taking this into consideration, CEEMET is convinced that the objectives of an EQF can only be achieved on the long run. In the meantime, and to promote transparency, it is necessary to ensure that qualifications can be compared one to another across Europe. Comparability of diplomas is indeed the first step towards facilitating the mobility of young people during and after their education pathway.

As regards experienced workers and employees, CEEMET members see the **Europass** as a useful tool, that could be developed as felt appropriate. For vocational qualification certificates, CEEMET is of the opinion that it is up to the sectors to decide whether European certificates are useful, and if so, to draw them up.

CEEMET furthermore welcomes the inclusion of **informal and non-formal learning** in the EQF, which may help develop high level professional competence.

In principle, the EQF might become a tool for creating permeability between the vocational education and training systems and the higher education systems. In this connection, the CEEMET member organisations believe there is a further need to have a closer look at the question in how far it is possible to link the "learning input" or "time" focused Bologna process on higher education with the "learning outcome" or "competence" based EQF approach. The same fundamental questions would of course have to be addressed in connection with the idea of combining the EQF with a credit transfer system, such as the existing ECTS or the ECVET, the Commission is thinking of, which in addition is not capable of dealing adequately with the full range of lifelong learning which, it is proposed, an EQF should cover, especially informal and non-formal learning. In any case, CEEMET considers it impossible to link the EQF, as a reading tool, with a system of automatic recognition.

An EQF will be of value to the labour market insofar as it can provide greater transparency and comparability in the development of competence and qualifications frameworks across Europe. It will not be of direct value to employers in any assessment of an individual's qualifications or competence, nor should it aim to be.

➤ ***The reference levels and descriptors***

The principle idea is to have common reference levels that are valid for both higher education and vocational training, and even include informal and non-formal learning.

CEEMET feels there is still a considerable need to further discuss among all stakeholders, the appropriateness of the proposed eight-level structure in relation to the currently existing different systems, even if in a longer term all countries might have set up NQFs.

Diplomas or certificates, which are mainly delivered at the end of basic education – generally assess knowledge and know-how. Occupational skills, on the contrary, can only be measured from occupational situations. Furthermore, personal skills cannot be attached to certificates but are related to individuals.

Furthermore, to be in line with learning outcomes, only what is effectively assessed for diplomas or certificates should be taken into account. However with the EQF, the risk would be to rely on theoretical objectives encompassed in the reference system rather than on reality. Finally, it is extremely difficult to make the differentiation between some of the definitions which are supposed to enable the measurement of the progression along the 8-level scale.

The member organisations of CEEMET are not unanimous as to the appropriate number of common reference levels. The opinions range from 4 and 5 to 8 and more levels.

Furthermore, the idea of having same levels for knowledge, skills and competences is felt to be difficult if not impossible to achieve.

In any case, should the Commission wish to pursue its efforts towards the setting up of such a structure, it would be necessary to assign a level to each **descriptor** in order to distinguish between rather general and further training-oriented qualifications and the ones being more job-oriented aiming at labour integration.

The reference levels appear to capture the complexity of lifelong learning. However, in line with the UNICE position, CEEMET is of the opinion that the proposed structure should be amended to reflect the following concerns: a. the reference levels should allow reflecting the career progression of workers even at the highest level and b. it should be ensured that the proposed structure does capture situations where individuals are, for example, on level 3 concerning "knowledge" but on level 6 for "wider skills and competences" because this corresponds to real-life situations.

The level **descriptors** are useful in principle. However they are not easily related to all types of qualification. It is not clear whether learning within compulsory schooling is intended to be covered by the EQF. If it is, then the descriptors for levels 1 & 2 are not really adequate. The implication that knowledge is not applied or used before level 3 is not acceptable.

CEEMET feels that the "**supporting information about levels in the EQF**" as stated in Table 2 of the consultative document is too detailed, confusing and in the end not "user-friendly". As explained already above, there is a risk that the process-driven descriptors here will dominate, to the detriment of the outcomes-based approach the importance of which is highlighted in the consultative document.

➤ National Qualification Frameworks

In some countries, frameworks already exist, which broadly reflect the approach in the consultative document. A very wide range of qualifications gained through further and higher education and through work-based learning has been defined in terms of learning outcomes.

CEEMET member organisations from countries where no comparable structures exist, see the EQF as a positive initiative to facilitate the implementation of compatible NQFs in their countries. If most CEEMET members recognise that a uniform NQF may also have as positive effect to achieve a transparency and comparability in countries where different systems exist in parallel, some fear that a uniform NQF could hamper the flexibility of the educational systems.

Thus, for CEEMET, the functioning and the success of the EQF will improve with the number of comparable NQFs, as long as those are developed with the involvement and agreement of the responsible parties at national level.

➤ Sectoral Qualifications

Under this chapter, the Commission document refers to the 2004 Maastricht communiqué and to a "*need for European ... education and training solutions*".

The EQF could be an important reference point for sectoral developments. However, the development of sectoral qualifications frameworks across Europe may be limited.

At European sectoral level, like at European interprofessional level, the **responsibilities of national authorities must be respected**.

First of all, CEEMET would appreciate very much if the Commission shared its information about European "sectoral standards" or activities and if these are successfully applied in practice. This goes in particular for the Commission's evaluation how these fit with the idea of the EQF.

On the interrelating scheme between European certifications, it is necessary to work on the correlations between diplomas, vocational degrees and vocational qualification certificates in a single sectoral scope on the one hand, and between vocational qualification certificates of different sectors on the other hand.

Building on different good national examples, CEEMET too has discussed different approaches as **to enhancing transnational transparency** of professional qualifications and individual competences. A European framework that could be supported by all CEEMET member organisations, so far has not been identified during these discussions though.

In the current situation, CEEMET is of the opinion that **European initiatives**, such as the "**Europass**" or "**Ploteus**" provide a useful tool to enhance mobility. The Europass might be further developed or supplemented by sectors.

CEEMET member organisations, however, might also be interested in considering the appropriateness of a "**European pilot for the metal, engineering and technology-based industries**". If such a pilot could be accomplished, it should be tested in practice during a **trial period**.

The 2001 "generic ICT skills profiles" project, which we understand is referred to by the Commission, although its emphasis does not seem to fully match with the EQF's, might be looked at in such an exercise.

CEEMET sees the Commission's reference to the European sectoral social dialogue as an invitation to the social partners to think about addressing this issue in their autonomous dialogue. As to the suggested involvement of the ACVT, CEEMET wonders whether this would not require first the formal involvement of the European sectors in this consultative body.

Furthermore, CEEMET would be interested in obtaining information if and to what extent the services of the Commission's Directorate General Education and Culture had prior consultations with colleagues from the Directorates Employment and Social Affairs, Internal Market or Enterprise and Industry. The latter Directorate General has dedicated one chapter to "improving sectoral skills" in its Communication on "Implementing the Community Lisbon Programme - A Policy Framework to strengthen EU manufacturing - towards a more integrated approach for Industrial Policy" - COM (2005)474 final of 5 October 2005.

➤ **Mutual trust**

National governments, authorities and social partners will keep for long their prerogatives on authorising diplomas and assessing training.

To develop mutual trust, the orientation taken for higher education to build a common framework of quality assurance could be extended to the whole educational system.

The advantage could be to introduce assessment practices where they still do not exist.

Through an agreement on principles of quality assurance, building on some of the work already done in regard to higher education through ENQA. It must be stressed that the emphasis should be on developing accepted principles rather than trying to harmonise QA processes.

There is a strong case for some pilot activity to test whether the proposed EQF is fit for purpose.

➤ **Any other comments on the EQF proposal**

The relationship between the proposed EQF and the development of a HEQF within the Bologna process is by no means clear. It is important that this is clarified. It is also important that any instruments adopted to aid EQF development are fit for purpose given the very wide range of learning which the EQF is intended to cover.

To be successful the voluntary EQF has to be based on an unambiguous terminology, i.e. common understanding and needs based. As to the more concrete design it has to be geared to learning outcomes and as user-friendly and simple and clear as possible.

Also with a view to ensure a duly balanced representation of the needs and interests, in particular of the "user end", in the ongoing process, CEEMET feels that the composition of the external expert group, the Commission will contract to analyse and synthesize the responses to the current Consultation, should be published in advance of their operation.

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