

***NATIONAL CONTRIBUTION TO THE CONSULTATION PROCESS ON THE  
EUROPEAN COMMISSION DOCUMENT 'TOWARDS A EUROPEAN QUALIFICATIONS  
FRAMEWORK FOR LIFELONG LEARNING'***

***~CROATIA~***

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**The following paragraphs are the result of a consultation on the document 'TOWARDS A EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING', including many relevant stakeholders in Croatia. The following is the result of their discussions, opinions, comments and suggestions to the mentioned document.**

**For an easier understanding, we organized the opinions of Croatian stakeholders into answers to the questions for the consultation process, as outlined in chapter 9.2, pg. 37 of the Document.**

***1. THE RATIONALE OF AN EQF***

The objectives and functions to be fulfilled by a European Qualifications Framework are well set in the document, especially concerning linking sectoral and national qualifications systems (NQF). To function in practice, NQFs have to be set at national levels to help individuals identify their qualifications in Europe.

EQF recommends the introduction of NQF, which would standardize an educational system based on educational outcomes, and simplify the utilization of human potential and the planning of work processes. The approach will increase work efficiency when it comes to finding necessary experts and achieving full work efficiency (traineeship period for trainees, new employees). Based on input values, companies will prepare programs for the introduction of trainees to work processes, because precise information will be available about the potential employee's level of knowledge and skills, while also achieving more effective planning of training programs within companies.

A prerequisite in the period of transition from the concept of permanent employment to that of permanent employability is raising the level of workforce skills in a knowledge-based society. This is achievable through continuing education. In other words, EQF will facilitate greater workforce mobility across national borders, thus making the EU workforce competitive and attractive in the emerging global market.

*The Croatian Chamber of Economy* points to the necessity to introduce a body in Croatia that would deal with the forecasting and planning of needed qualifications as well as with the authorization of the existing ones. The future national body, based on a tripartite principle, should

gather together all stakeholders included in economic processes in order to achieve the best possible definition of required qualification outcomes. The adoption of a tripartite principle would ensure activation of the system, thus allowing the identification of needs in order to make the system as efficient as possible.

EQF supports development of a national policy with an objective of modernisation of the national approach to education as a strong side of economy. It supports methodology of development of NQF and an active role of users in the education process

Before setting up the EQF, terminology should be agreed upon between all countries to avoid misunderstanding and the EQF can orientate in the process of recognition of qualifications, and as basis for development of national criteria with regards to qualifications.

Differences between reference levels should be based on clearly defined scientific criteria; should be less descriptive but rather should follow principles agreed upon.

More attention should be put to existing scientific and expert research and projects, such as Tuning project (<http://europa.eu.int/comm/education/Tuning.html>), the *Association for Development of Higher Education* advises, mentioning the already existing Bloom taxonomy of educational goals, classifying it to cognitive, affective and psychomotoric areas.

The EQF document coherently fulfils objectives and functions but only indirectly touches on the importance of employability. There is not enough attention paid to potential future outcomes on the labour market.

There is a need to establish a monitoring body including all Member States of the EU that would help solving problems during the process, for example, with regards to sectoral qualifications. There is also the question how complicated system of VET could adapt to one meta-framework?

EQF will definitely assist in development of European system of lifelong learning. The *Croatian Employment Agency* already uses methods that presuppose lifelong learning approach and guidance in their everyday work.

They indicate that an EQF will shorten the period of search for relevant and comparable descriptors in the modern system of education and training with regards to both EU and national systems including quality assurance. Special attention should be given to the flexibility of recognising qualifications and credits so that certain professions can be legally recognised.

To implement a possible EQF, national education and training systems should be linked and updated according to changes in the labour market so that citizens get a clear picture of where their qualifications stand in the EU, that is, how they compare to similar qualifications in other EU countries. Development of EQF should be ongoing and should be updated regularly.

## 2. THE REFERENCE LEVELS AND DESCRIPTORS

Most of stakeholders hold that the structure of EQF is satisfying and that 8 reference levels for describing the reality of lifelong learning in the EU are sufficient. Descriptors for knowledge and skills are adequate but are too abstract for personal and professional competences and it is not measurable which point to the problem of quality assurance. Additional information should be constantly updated according to labour market needs. EQF should be linked to recognition of qualifications (common database) and to the EUROPASS instrument.

However, different stakeholders see different problems and give different solutions and/or suggestions.

*The Association for Development of Higher Education* suggests conducting pilot research which could take samples from all structures included in lifelong learning and with the objective directed towards identification and categorisation of competences and learning outcomes.

*The Croatian Chamber of Economy* suggests that final decision on the number of levels should be made by experts. They refer to level 4, a notably crucial point, because it marks the division between the guidance (requiring guidance in the learning process) and leadership levels (leadership, capabilities, self-teaching).

*The Croatian Institute of Education* reminds that in Croatia there exists a qualification system on 8 levels by ILO-ISCO National Standard Classification of Occupations and even though this national classification system is not built on lifelong learning principles, its 8-level system is compatible with a possible EQF and it can cover all key levels of competences.

A suggestion is that lifelong learning is not oriented to the system but to individuals and therefore should cover formal, informal and non-formal learning, meaning that at the beginning of each qualification descriptors there should be thorough descriptions of competence for the respective level. This kind of approach was developed in the document: 'Key competences for lifelong learning', European Reference Framework, Nov, 2004, Council of Europe.

*The Croatian Association of Employers* points out that formally, 8 reference levels are described but 10 reference levels are used in practice. They suggest that each level should be better described in sublevels.

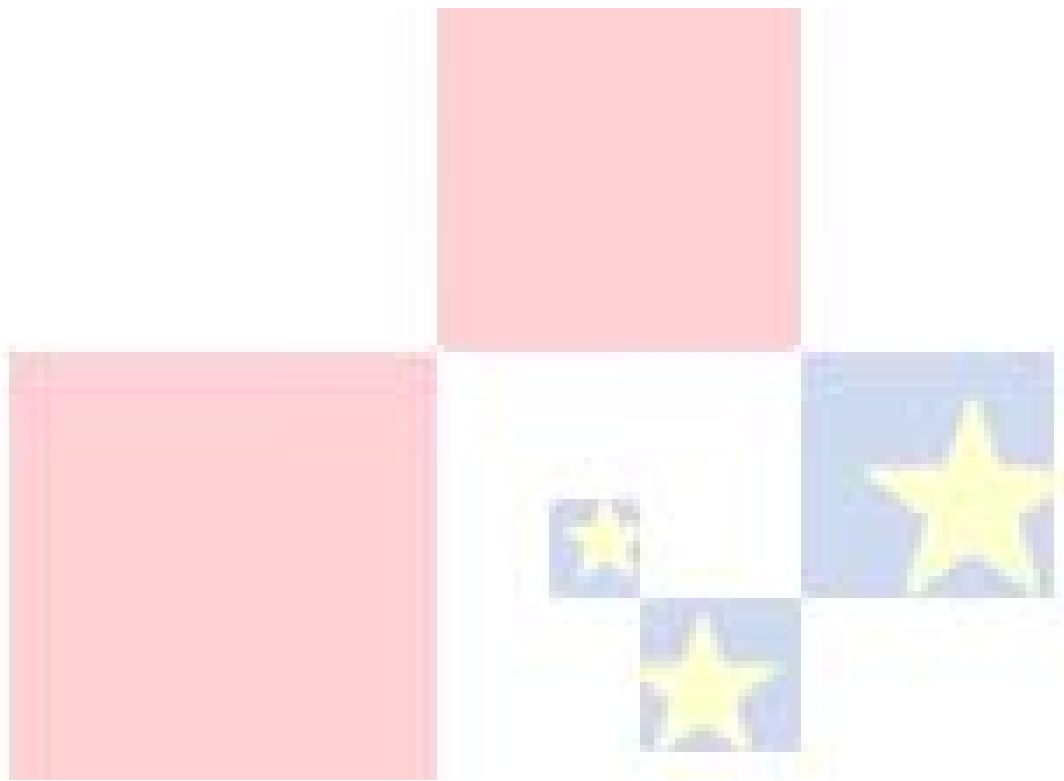
Level descriptors are general and there is a question of educational outcomes and validation of personal competences. Adding to that, they question is who is going to validate competences and what will be criteria used for validation. A suggestion is to include samples of qualifications and their positions within national systems in Table 2.

Tools for validation of non-formal learning should be mentioned and described. All questions regarding EQF should first be discussed and settled at national levels, possibly in NQF.

Recognition of qualifications across borders should not affect labour market demands in a negative way. Differences between qualifications should be analysed well so that countries can

develop programmes to bridge these differences in order to simplify and support labour force mobility. Employers could use that as a quality assurance standard that would ensure better employability and improve human resource management.

Adding to that, the Croatian Chamber of Crafts advises that the labour market should be analysed to find out which, and if all occupations are required on the labour market.



### 3. NATIONAL QUALIFICATIONS FRAMEWORKS

It is important to mention that a National qualifications framework is not developed yet in Croatia. However, first steps have been made on different levels and in different institutions.

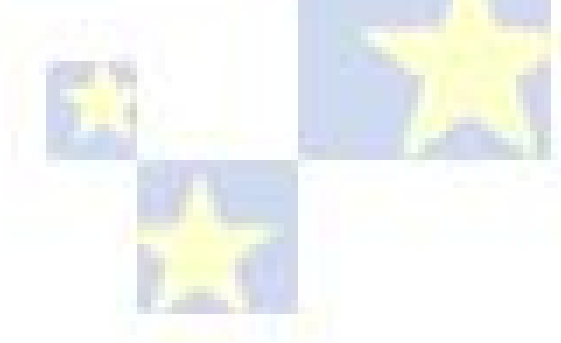
*The Agency for Vocational Education* reflects that NQF should be taken as foundations of education system development. Principles of EQF are reflected within certain programmes, such as master exams for crafts schools.

The period in which NQF could be developed, by some stakeholders, is within 5 years from now. As already mentioned, establishment of NQF is in the process of development, and some suggest that preparing it in line with EQF could be the most effective solution.

*The Ministry of Science, Education and Sports*, working together with *Agency for Vocational Education*, plan to produce sectoral analysis with social partners for VET, after which they will produce a draft of NQF for the VET area.

NQF will provide higher mobility of labour force in labour market.

*The Croatian Chamber of Crafts* warns that before setting up an NQF, occupations based on formal, informal and non-formal learning should get legal recognition. Following that, there should be bodies responsible for the process of recognition of qualifications.



#### 4. *SECTORAL QUALIFICATIONS*

EQF can catalyse and influence development of policies because the internationally accepted procedure of validation of qualifications will influence development at sectoral level. However, it should be updated regularly according to the changing needs of a labour market and the modernisation of technology.

Setting up of NQF and harmonisation with EQF will bring better quality and development of skills in different sectors at the national level.

It is greatly important for all sectors to establish EQF to make mobility easier and the system of education more transparent.

*The Croatian Chamber of Economy* approach is based on sectoral approach. Tripartite principle would ensure the activation of the system, thus allowing the identification of needs in order to make the system as efficient as possible.

EQF could be seen as a guideline for the development of linkages between different educational levels and it can certainly assure better transparency of crafts occupations. A strategy should be developed to show which occupations are required in different sectors.

*The Croatian Union of Employers* points out the division which should be made between learning outcomes and descriptors, suggesting that within learning outcomes more descriptors could be included.

## 5. MUTUAL TRUST

EQF can contribute to development of mutual trust because it will serve as one meta-framework for comparison, so that each country can compare their qualifications framework with one common framework.

Establishing both EQF and NQF will help establishing mutual trust based on appreciation of common principles in education, lifelong learning approach and its development on European, state, sectoral and local levels.

It is extremely important to describe in details all key terms in EQF for better understanding and easier translation to NQF. The Bologna follow-up group points out that parallel to Bologna process, lifelong learning system should be legally recognised in order to overcome unnecessary obstacles in the whole process.

Employers point to problems that could occur in the process of integrating qualifications into the European system. A central system of providing quality assurance should be developed, to ensure transparency and coherency of EQF, and which would also enhance mutual trust between participants. The problems could occur when dealing with migrations and mobility of non-qualified or semi-skilled workers, especially if the worker has weak or no formal education.

Non-formal and informal learning should complement formal learning to ensure and emphasize the recognition of non-traditional forms of learning.

Common terminology could ensure better understanding and easier recognition of qualifications in Europe by the individuals, as well as stakeholders and all involved.

The mere existence of EQF will give incentive to sectors and individuals to validate their qualifications within broader framework of qualifications. Individuals will have stronger motivation to be included in the world of learning throughout their whole life, thus acquiring the knowledge and skills needed in working life.

*The Croatian Chamber of Economy* advises that only the synergy of all stakeholders in the lifelong learning process can produce higher competitiveness of the Croatian economy.

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