

# CONTRIBUTION OF THE SPORTS SECTOR TO THE EQF CONSULTATION

The contribution has been elaborated with the participation of the following organisations:

- European Association of Sports Employers(employers representative organisation);
- Union Network International – Europa (employees representative organisation);
- European Olympic Committees and European Non Governmental Sport Organisations (European sports movement umbrella organisations);
- European Network of Sports Sciences, Education and Employment (training providers);
- European Health and Fitness Association (sub-sector organisation gathering employers, employees and training providers). Their specific contribution is included here as an annex;
- European Observatoire of Sports and Employment (accompanying expert organisation)

In taking the initiative to send a collective response to the Consultation organised by the European Commission on the European Qualification Framework (EQF), the participating organisations, representing the Sports Sector at the European level are pursuing three main goals:

- Engage a systematic dialogue at the European level between the organisations representatives in the sports sector on subjects which may affect the development of sports, in particular education and training;
- Contribute to strengthening the “European development” of our sector in the perspective of the Lisbon declaration by E.U. members states to become “the most competitive knowledge based economy in the world, combining sustainable economic growth with more and better jobs and greater social cohesion”;
- Take the opportunity to influence, in some aspects, a process which is crucial for a sector characterised by a great diversity of qualifications, high level of mobility of workers in some of its segments, short or split careers, strong presence of volunteers with weak recognition of informal/non formal learning.

As a first common experience for a sector which is not strongly established, we have also to be aware of our limits. The EQF consultation has been based on 14 questions which have different concerns in our sectoral perspective. We can consider 3 levels of interests:

- The EQF “is envisaged as a meta-framework increasing transparency and supporting mutual trust. It would thereby enable qualifications frameworks and systems at national and sectoral level to be related to each other – thus facilitating the transfer and recognition of the qualifications of individual citizens”. As such the EQF is included (as a cornerstone) in a broader European training policy which has been defined in Copenhagen 2002 and is implemented since that time with the contribution of the members states. Our first point will be to present **the relevance of “the principles and procedures providing guidelines for co-operation” included in the EQF for the sports sector** (could be related mainly to question 9 and also to questions 1 and 2 of the consultation);
- The EQF proposing 8 reference levels will have a direct impact on a sectoral qualification policy. We, as a sector, are concerned by the effects of such a common reference on the existing systems and the necessary efforts to relate those systems to the EQF; we will present our main concerns on **the foreseen relations between**

**existing sectoral qualifications and the EQF** (could be related mainly to question 6 and also to questions 3, 4 and 5 of the consultation);

- The EQF is not only based on general education and training policy guidelines and is not only a global proposal on reference levels but is also promoting **methods, tools and domains of action related to the EQF** which may affect the way “qualifications” are developed in our sector (could be related to questions 10 to 14 of the consultation).

We will present our contribution following those three points after a short presentation of the sport sector.

## **1) The sports sector in brief**

The sports sector represents a group of varied physical activities and services ranging from organised competition within clubs as a means of training and education, to the events put on by professional sports people, leisure sporting pursuits practiced for pleasure or fitness purposes, and the use of sports to boost social integration of population groups in difficult circumstances. All kind of “enterprises”, private, non for profit (sports associations), for profit (professional sports companies or leisure sports companies), public related organisations (local municipalities sports services) are present with a huge dominance of very small and small enterprises. The core of the sector is still based on sports associations, gathered in national and international governing bodies, themselves part of an international sports movement.

Each of those “sub-sectors” could be divided in specialities (professional soccer, professional tennis, etc...) quite diverse in the way they are organised. Sport is representing an average of 1.7 % of the GDP in the E.U. countries. Together, these largely interdependent practices concern over half of European citizens, with nearly a million employees working in the field as their main professional activity (employment has grown by nearly 60% in the last 10 years) and almost 10 million volunteers throughout the European Union.

Going beyond the differences in “sporting systems” that we observe in member states (i.e. the unequal importance given to the various stakeholders, sports association movements, public authorities, private entrepreneurs, social partners, etc. as regards managing sport), we intend, in line with the Lisbon objectives in the field of sport, to make the European sporting systems and their various components reference systems in the world by 2010.

This sector cannot be developed optimally without improving the qualification of those who coordinate it, whether professionally or voluntarily. At present, there tends to be an opposition within vocational training and education in the field of sport, between the “low-level”, non formalised practical training courses and the “high-level” academic courses which do not always match the needs expressed in the job market. In that context, the European vocational training and education policy constitutes a real challenge for joint mobilisation and conciliation of the two types of training that we have mentioned.

Although we are dealing with a sector that is young and relatively disparate as regards the characteristics of the organisations/companies comprising it, major constructive work has been carried out at European level. In addition to the national and European public authorities, this concerns the sports association movement (represented by ENGSO and the EOC), training institutions (represented by ENSSEE), standards setting sub sector bodies (represented by EHFA) and social partners (represented by EASE – *employers* – and UNI-Europa – *employees* –) all of which are acting both within their own realms of responsibility and in close collaboration with one another.

## 2) The relevance of the principles and procedures providing guidelines for co-operation included in the EQF for the sport sector

### Reference questions:

**Q9** - *To which extent can the EQF become a catalyst for developments at sector level?*

**Q1**- *Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?*

**Q2**- *What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?*

- **Q 9:** Qualifications in the sports sector could be characterised by four main traits:
- **A high level of diversity:** there are more than 1800 training providers delivering more than 12 000 training programmes to nearly 200 000 participants each year in Europe. Most of those programmes are non formal, given as a complement to field practice and delivered by sport governing bodies. But an important number take place also in higher education institutions as initial formal education. Other contributors, such as professional organisations, private companies or public training centres belonging to the Ministries in charge of Sports are also present. As some other sectors such as Agriculture, Culture and Health, sports have “specific” training systems, sometimes (even if less and less) outside of the general national VET system. Efforts have been made to build bridges between those different programmes at national and European levels. In the sport coaching area, as an example, a European Qualification framework has been established some years ago as a common reference based on the 1985 directive on qualifications. ***The existence of an EQF will be a strong support to these efforts and to provide a tool both for internal and external comparisons.***
- **A high degree of mobility in some sports occupations, most of them being regulated:** Sport is one of the sectors with the highest level of conflicts related to European mobility. A majority of countries are regulating access and activity in sports occupations. The general directives (1989 or 1991) are subjects to interpretations by the members’ states and the sports authorities and restrictions to mobility often presented to the European Court of Justice. ***Any initiative bringing more transparency and mutual trust is welcomed in the sports sector.***
- **Short and split careers** are another trait of the sports sector: the average length of the career is less than ten years, with a necessity to update frequently qualifications and to retrain to take higher positions or to turn to a new type of occupation. The ***lifelong learning process is one of the key issues for the professionals of the sports sector at the European, National and Local levels.***
- **High presence of volunteers or volunteerism with poor recognition of informal learning** is also an important characteristic of the sports sector. We have already said that the sports sector couldn’t envisage existing any more without the contribution of volunteers. We can add that few of the professionals (in that case understood as “paid personnel”) with the exception of Health and Fitness have reached their position without having served as volunteers for years. There is a huge problem to have those experiences recognised as qualifications, both in the sports sector and in other sectors. ***The EQF seems to be an excellent framework for the development of the validation of non-formal and informal learning which is of particular interest for the sports sector.***
- To summarise, by applying the principles expressed in the **Copenhagen declaration** on vocational education and training at the European level, significant progress could be made in this sector whilst making it easier to share the most successful European experiences. By emphasising lifelong learning, the validation of informal learning, the development of sandwich courses and apprenticeships, the assessment of the quality of courses with a view to transparency of qualifications, and credit transfer, ***a strong***

**support will be given by the EQF to some of the key problems that the sports sector is facing.**

- **Q 1:** The consultation document is comprehensive in its coverage of the important objectives and functions of the EQF.
- **Q 2:** To be practically used in our sector the EQF needs an important cross cooperation between the sector and the national qualification authorities, as well as an important involvement of stakeholders (social partners, the sports movement and the training providers) to deliver accurate standard information. It will be important to develop concise guides for different audiences such as individual, training providers and employers. Case studies of how the framework can be used will also be valuable.

### **3) The foreseen relations between existing sectoral qualifications and the EQF**

**Reference questions:**

**Q6-** *How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?*

**Q3-** *Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?*

**Q4-** *Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?*

**Q5-** *What should be the content and role of the ‘supporting and indicative information’ on education, training and learning structures and input (table 2)?*

- **Q6:** We have already said that “**qualifications**” in the sports sector are numerous and diverse, more or less included in the official national qualification frameworks, sometimes promoted at the international level by international sport governing bodies for their affiliates (football, golf, etc...), even “in opposition” with national regulations. Some experiences have been conducted at the European level to give some guidance to the authorities wanting to establish new qualifications as well as those refining the existing ones. Since 15 years, most of the European countries have followed the “*European qualification framework for sport coaches*” elaborated within ENSSEE by a mix of the key European stakeholders such as professional organisations, training providers, national accreditation and qualification authorities. There is a similar model in Health and Fitness over 10 years. We can observe in the sports sector as well as in most of the national qualification systems, more and more **emphasis given to “competence” as key criteria for setting qualifications**. It has been also the way followed through the European experience cited above. The core sports occupations (sports coaches, instructors, leaders and managers) are based on the mastery of quite complexes competences, to be demonstrated “in the field” after an apprenticeship including several years of personal practice. Even in the initial formal learning systems, emphasis has always been given to that “practical” dimension, either included or in complement to the formal learning. One of the points of tension in education and training has always been the balance between that practical dimension and the reference knowledge applied to sports (biomechanics, physiology, psychology, sociology...) put forward in an academic context.
- **Q 3:** The **choice of eight levels and the way they have been distributed is compatible with what already exists in the sports sector**. Even if collective agreements at national level are sometimes going more into details (most of those collective agreements are including “scales of qualification” with more than eight levels) we can manage within the 8 levels scale. The European framework of qualification for coaches, already mentioned, is exactly fitting with level 4 to 7, both in terms of definition

of the level and global content. Most of qualifications in our sector are located between level 4 and level 6.

- **Q 4:** In this regard, ***the way the reference levels have been defined is more or less in accordance with what is generally done in most of the existing systems related to sports***. But one of the remaining difficulties is the relations between the three set of descriptors used for the definition of the different levels: “knowledge, skills and personal and professional competences”. The key question is to be able to integrate those three “categories” of “learning outcomes” in a “capacity to operate professionally”. Even if an analytic approach may help in the recognition of qualifications, there is a risk to consider them as an “addition of competences” which could be gained in separate processes. ***We are in favour of an exclusive use of the “competence” terminology***, fully agreeing with the way it has been conceived in the consultation document (“cognitive competence”, “functional competence”, “personal competence” and “ethical competence”).

We would also like to introduce a remark on the “**key competence**” list : we have not seen any reference to “**physical culture**” as a base of the workforce. The “physical culture” is changing in accordance with the social and economical transformations (less importance given to strength for example). But even in a more and more tertiary economy, the acquisition of an adapted “physical culture or competence” is an essential dimension of social and economical integration. We suggest to include it explicitly in the “cultural expression” item.

- **Q 5:** The “**supporting information**” (table 2) ***document gives the “most usual references” as a guidance to readers*** (both individuals and training providers). We still encounter the “contradiction” between reference to a certain level of professional expertise (which suppose field experience) and the reference to degrees. ***The role of supporting information should be expanded to include professional and vocational skills.***

#### **4) Relevance of methods, tools and domains of action related to the EQF**

##### **Reference questions:**

**Q10-** *How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?*

**Q11-** *How can stakeholders at sector level be involved in supporting the implementation of the EQF?*

**Q12-** *How can the link between sectors development and national qualifications be improved?*

**Q13-** *How can the EQF contribute to the development of mutual trust (e.g. based on common principles for quality assurance) between stakeholders involved in lifelong learning - at European, national, sectoral and local levels?*

**Q14-** *How can the EQF become a reference to improve the quality of all levels of lifelong learning?*

As clearly stated in the consultation document, the purpose of EQF is on the one hand to enable individuals and organisations to identify qualifications at the European level and on the other hand to offer **methods and tools** in relation with a global education and training policy oriented towards that goal.

In that section we will consider three main issues:

**- Q 11:** We can consider two different meanings of the question: ***the way the EQF will be implemented at sector level*** and ***the contribution of the sector to the implementation of the EQF***.

- The first dimension is crucial in a sector which is composed of very diverse segments and numerous stakeholders. As a joke, we could say that if we can achieve it in the sports sector, it will be the proof that it could be done anywhere else!
- Until now, our approach to European cooperation has always been based on a permanent feedback between the “top” of the system (*European organisations*) and its “bottom” (*each of the local clubs and training providers*, as an example...). We have the chance to be part of a sport sector quite organised with bodies able to represent at national and European level all these local organisations. Nevertheless it is time and energy consuming which is the only way to handle the process... The manner to proceed is to start from all local situations, to try to provide collective/general guidelines agreed at “top” level, including of course the public stakeholders, with reference to the general situation (European education and training policies), and go back to the individual service providers through their representatives in any sub-sector and at all levels.
- In that situation, the existence of the EQF is a very important tool which creates a common reference/language and assure the link with other sectors;
- Even if limited, our experience may be transferred to other sectors...

**- Q 12:** That question is critical for us, due to the weight of “regulated professions” in our sector. We have to link three bodies: ***the national “regulating authorities”, the national “qualification authorities” and the other sector’s stakeholders*** (sports organisations, employers, employees, training providers...).

- The link between “*regulating authorities*” and “*qualification authorities*” is becoming more and more tight (even if some discrepancies remain present) and we will not consider here that type of relation mainly concerning public authorities.
- The link between the two previous bodies and *the representatives of the sports sector*, particularly when operating at European level, is more critical. Our major advantage is to be in a developing sector: public authorities are confronted to a permanent and better adaptation of their regulations to the evolutions of the needs of the labour market. We must say that both the voluntary sports movement and, more and more, the social partners, are contributing to the definition of qualifications.
- Nevertheless, we can’t leave that crucial relationship and its improvement to the on going dynamic which seems to be favourable at this stage. We are in favour of a reinforced cooperation between the European sectoral organisations and a “European conference of qualification agencies” to be created if not existing. It seems to be the only way to stimulate an acceptable and shared response to the social and economic needs at sector level, without being confronted to huge national resistances. Of course the inter-sectoral social dialogue is part of this process to keep its global coherence, but we would like to insist on the importance of the dialogue at the sector level.

**- Q 13:** We consider that those three dimensions are closely linked with each other: no mutual trust without quality assurance; no quality assurance without transparency of

processes. Our understanding of the challenge and the way we would like to face it is to start by common /agreed statements on the situation of the sector:

- First, identify the core **dimension of the industry** and its main components (sub-sectors). That has already been done under the guidance of social partners;
- Second, identify the core **sectoral standard occupations**: steps have been done and reference documents exist which have to be endorsed by all the key stakeholders;
- Third, agree on the “**functional maps**” corresponding to those standard occupations: several sub sector such as the Health and Fitness and the Coaching are quite far in that direction but the work has to be completed and extended to the whole sector;
- All identified **competences have to be related to “learning outcomes”** and set in a “modular” system to start a systematic construction of credit accumulation and transfer. There are numbers of experiences on going in the sub-sectors at national or transnational level in the sports sector. A European Socrates TNP project (“AEHESIS”), gathering training providers and social partners at post secondary and tertiary level is working on that purpose. We have to check these experiences carefully, to work in direction of a coherent system and to facilitate the dissemination of “good practices”.

*The EQF is a strong support for such a process, giving acceptable common references for the sector and keeping relations between the sports sector and other sectors.*

**Contact related to this document could be taken with EOSE**



**secretariat: [eosesec@eose.org](mailto:eosesec@eose.org)**

# ANNEX



*Setting the Standard for the European Health and Fitness Sector*

## EUROPEAN QUALIFICATIONS FRAMEWORK

### EHFA

#### **The rationale of an EQF**

**Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?**

Yes the consultation is comprehensive in its coverage of the important objectives and functions of the EQF. EHFA firmly believes in the objectives of the EQF and has already mapped its new European Fitness Competence Framework to the EQF as part of this consultation process.  
[www.ehfa.net](http://www.ehfa.net)

If the EQF is ratified EHFA would support the view that it will be important to develop more concise guide for different audiences eg training providers and employers. Case studies of how the framework can be used will also be valuable.

**What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market?)**

EHFA would support the EQF meta framework sitting above both a network of national cross sector frameworks in each country and also European sector based frameworks such as the one produced by EHFA. The European Commission should actively encourage the development of both.

Through the Leonardo da Vinci Project Fund the European Commission supported projects such as Eurofit-qst [www.eurofit-qst.net](http://www.eurofit-qst.net) which has developed a knowledge and competence framework for the European fitness industry. Recognition of these types of frameworks, within the EQF structure, developed by sectors at the European level will make a practical contribution to VET, the labour market and individual citizens across Europe wanting to work in the Fitness sector

In addition agreement of level descriptors and learning outcomes is vital, as well as credit definitions and quality assurance guidelines.

#### **The reference levels and descriptors**

**Does the 8-level reference structure sufficiently capture the complexity of Lifelong Learning in Europe?**

Yes. EHFA originally followed the five level CEDEFOP structure with some good results but in testing the new eight level structure EHFA feels that this is sufficient to capture most learning outcomes and progression in levels. The eight level structure should allow a more “route neutral

approach to learning in as much that it should be possible for someone active in the labour market with experience but no formal qualification at the higher level to gain recognition without following the traditional academic pathway. This is to be welcomed

**Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?**

EHFA is not sure that the use of the term “learning outcome” as a definition to encompass the content of the whole framework is appropriate for the EQF and the proposals in table 1. The consultation document states that a learning outcome is: *“The set of knowledge, skills and/or competences an individual has acquired and/or is able to demonstrate after completion of a learning process. Learning outcomes are statements of what a learner is expected to know, understand and/or be able to do at the end of a period of learning”* this brings in to question whether the term learning outcome should be applied to a framework when the EQF itself is not a “period of learning” nor a “learning process”. In line with the definition, the term learning outcome should possibly be reserved for programmes of learning, not parts of frameworks. In some countries such as the UK frameworks use the terms “level descriptors” and “benchmark statements”.

Although most level descriptors and learning outcomes are appropriate EHFA has two areas for suggested improvement.

1. The “knowledge” learning outcomes use the terms “apply” and “use” knowledge. This is inappropriate. The knowledge learning outcomes should be concerned with the accumulation of knowledge. The application and use of knowledge is different and implies a level of skill or practical competence. It is unhelpful to infer that someone with knowledge can apply it in a work situation.
2. EHFA disagrees with the proposal to make “professional and vocational competence” only one quarter of personal and professional competence. Professional and vocational competence should be equally prominent to knowledge and skills. In addition EHFA strongly disagrees with the learning outcomes for professional and vocational competence at levels 1 to 4 solely being concerned with problem solving. Technical proficiency is at least as important as problem solving and new learning outcomes should be devised around technical vocational competence. The proposals state of the learning outcomes: *“These three types of outcomes can be described at each level of the framework in a way that facilitates amplification and exemplification by national and sectoral bodies”* we do not believe this is possible for professional and vocational competence in the current proposal.

The way in which professional and vocational skills are dealt with in the EQF is vital both the employer buy in and the relevance of the EQF to European sector developments. European sector framework developments are often related to the job market and where this is the case more guidance will be required from the EQF than is the case in the proposals in table 1.

Finally the transparent recognition of the place of competence and experience in the workplace should be recognised. As a general framework EQF is an excellent tool but an additional part which clearly identifies that someone who may have achieved a level seven qualification by moving through school further and higher education should not consider themselves as competent until they have demonstrated the use of their skill and knowledge in the workplace over a period of time. This may be recognised in the Europass document but it would be more powerful to recognise it in the EQF structure.

**What should be the content and role of the “supporting and indicative information” on education, training and learning structures and input (table 2)?**

The role of table 2 should be expanded to include professional and vocational skills and new work based level descriptors should be devised. An example from our EQSF Framework is BASIC LEVEL Exercise and Fitness Instructor

Assesses, plans, delivers and evaluates exercise and fitness programmes in the workplace for individuals and/or groups based on professional skill and expertise, responsibility and autonomy. The Exercise and Fitness Instructor may coordinate the work of other (Trainee/Assistant) Exercise and Fitness Instructors and may be concerned with the education of Assistant Exercise and Fitness Instructors and (the) participant(s).

**ADVANCED LEVEL Senior Exercise and Fitness Instructor**

Assumes responsibility at an advanced level of practice in exercise and fitness, directing (acting as supervising professional), promoting and organising the activity, educating (Trainee/Assistant) Exercise and Fitness Instructors. The Senior Exercise and Fitness Instructor may have responsibility for the management and/or operation of the facility and be involved in applied research in the exercise and fitness environment.

**How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?**

As stated earlier EHFA has developed a competence framework based on an industry functional map related to the jobs in the sector and an attached document containing learning outcomes to support the individual competences. This framework maps well to EQF although it has been difficult to decide on levels as the Professional and Vocational competences are weak as stated above. It is the opinion of EHFA that this section should be stronger and supported in Table 2 to allow clear job profiles to be linked to specific levels.

**National Qualifications Frameworks**

**How can a National Qualification Framework for lifelong learning – reflecting the principles of the EQF – be developed in your country?**

Not applicable to EHFA

**How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?**

Not applicable to EHFA

**Sectoral qualifications**

**To what extent can the EQF become a catalyst for developments at sectoral level?**

To a large extent. The EQF effectively highlights issues like regulation of qualifications and mobility of workers. The European Commission should use the EQF development to encourage

and support developments at sector level. As stated earlier EHFA has been involved in a project to develop a knowledge and competence framework for the European health and fitness industry and the EQF was a significant part of discussions. The EQF can also be used by sectors at a national level to benchmark against the European frameworks which will encourage the mobility of workers and the recognition of their qualifications across Europe as well as defining benchmark levels for minimum competences within the job market. EHFA has established a European Register of Exercise Professionals where the entry requirements will be based on the EQF and further refined when a credit structure for sector qualifications is defined.

### **How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?**

Within the sports Sector there has been much interest in the development model adopted by EHFA and the Fitness Sector. Coaching and the Outdoor Sectors of sport are now working towards a European Qualification Framework with EQF as their base. It would be helpful if other sectors who are working towards these goals at the European Level could be identified and brought together to share ideas and methodologies.

### **How can stakeholders at sector level be involved in supporting the implementation of the EQF?**

EOSE as the Observatoire for the Sports Sector has encouraged the Sports Unit of the European Commission to coordinate the key stakeholders in the sports sector to work together on a policy and implementation of the EQF and a credit system. In addition it would greatly enhance this development if those within the European Commission responsible for Employment, Education and Training and Sport were to work together in support of this key network mentioned above to develop a true platform of transparent cooperation.

### **How can the link between sectors development and national qualifications be improved?**

Through the use of an efficient quality assurance system which involves recognised, independent sector bodies. Within our work at EHFA it has become clear that whilst there is usually an identified body in each country responsible for VET there are differing structures below these bodies responsible for the quality assurance of sector vocational training. EHFA supports the third party principle of qualification verification and whilst respecting national subsidiarity in this area would encourage cooperation with European sector bodies able to demonstrate the support and recognition of national or European social partners.

### **Mutual trust**

#### **How can the EQF contribute to the development of mutual trust (eg based on common principles for quality assurance) between stakeholders involved in lifelong learning at European, national, sectoral and local levels?**

The EQF will provide the basic structure on which a transparent quality assurance framework can be built. In addition with the development of the ECVET a wider and more defined structure should emerge to enable those responsible for vocational frameworks at national level to map their frameworks accurately with each other. There is one note of caution which EHFA would raise and that is to make clear where sector frameworks fit within the structure as there may be a perceived tension between national bodies recognised by the State and European bodies

recognised by social partners. Conflict should be avoided if a clear message is to be delivered to those involved in the job market.

**How can the EQF become a reference to improve the quality of all levels of lifelong learning?**

The European Commission should ensure that Leonardo da Vinci funding for vocational qualifications or other funding for qualification development should be directed at projects which support the EQF. Sector and national case studies should be developed. In addition the eight level structure should be promoted as a route neutral framework recognising experience in equal measure as academic learning. The current language of the framework and guidance is too academic to be supported by social partner organisations.