

European Qualification Framework

Position of WKO

Thomas Mayr, 1.12.2005

WKO supports the concept of a European Qualification Framework. Improved transparency between different qualifications will contribute to the strengthening of Lifelong Learning and national and international mobility and will help reaching the Lisbon Goals. We deem the principal of a European Meta-Framework, which can be used by the Member States on a voluntary basis as a far reaching and difficult, but feasible task.

We especially welcome that the Commission's draft does not propose the EQF as an isolated instrument but that it sees the EQF in relation to the other European transparency instruments.

In order for the proposed Meta-framework to be relevant and useful for companies and the labour market, WKO deems the following aspects important:

1. We support the focus of the EQF on learning outcome. Neither the EQF nor the national qualification frameworks to be developed should focus on formal degrees only. In order to provide value added compared to existing classification systems such as ISCED, it is imperative that the EQF focuses on the capacity to act in a professional context. It is only possible to speak about learning outcome with reference to a professional activity. A qualification as defined in the EQF therefore can only consist of a formal degree or validated informal competences plus relevant professional experience.

The Commission paper focuses rightly on learning outcomes and summarizes this approach in the descriptors of table 1. Table 2 however is input-oriented and is therefore in stark contradiction to the learning outcome philosophy. Even if table 2 is only intended to serve as additional information, we see the danger of mixing the new learning outcome approach with the traditional input approach. The inclusion of such an input approach in the document bears the danger that the application of the EQF will fall into the old and well established habit of comparing learning years instead of learning outcome. Not only that table 2 follows a very traditional view of formal and school based education and completely leaves out the wide array of CVET, we believe that this table is in its whole completely at odds with the very principle of the EQF. We therefore propose to leave it out completely and focus on table 1 only.

2. Concerning the number of levels, WKÖ reckons that eight levels might be too much. In today's world of work with flattening hierarchies we believe that a smaller number of levels would be sufficient to describe the realities at the work place. Furthermore, we believe that a reduction of the number of levels would make the EQF more transparent and easier to understand.
3. It is of utmost importance that general and vocational education and training are seen as equivalents ("parity of esteem"). The goal of making VET more attractive must be well reflected in the design of the EQF.
4. In its present form the levels and its descriptors implicitly refer more to formal academic learning than other forms of learning including learning in vocational

fields. Especially the levels 6, 7, 8 seem to refer primarily to the Bologna levels and much less to labour market necessities. In order for the levels to be consistent with the EQF's claim of a learning outcome approach, they should be reformulated so that they also apply to learning in professional and vocational domains. The highest level should describe the highest possible excellence in any given domain without making any reference to learning years or type of learning. It goes without saying that a university teacher on the highest level will have undergone more and different training than a baker on this level. For a university teacher it might be a Ph.D. plus relevant experience in research and teaching whereas for a baker it might be a Master qualification plus specific further training and several years of professional experience including leadership and management. Both meet the highest demands in excellence in their respective domains and should therefore be on the highest EQF-level in their domain. The formulation of the descriptors in table 1 should bear this in mind. For this reason it is necessary to use a more neutral terminology. We especially would like to propose the following reformulations:

- a. Level 7 under the heading „skills“: Deletion of the term “research based”. The descriptor will then read as follows: „Create a diagnosis to problems by integrating knowledge from new or inter disciplinary fields and make judgements with incomplete or limited information“
- b. Level 8 under the heading “skills”: Deletion of the term “Research”. The descriptor will then read as follows: “Conceive, design, implement and adapt projects that lead to new knowledge and new procedural solutions”

Such changes do not affect the concrete sense of the descriptors but make it possible that these descriptors also apply outside academic domains.

5. Qualifications are made up of a bundle of competences and differ in their scope between Member States. There are countries with relatively narrow qualifications whereas other countries apply a principle of broad professional profiles (“Berufsprinzip”). The relative broadness of qualifications orientated at the “Berufsprinzip” guarantees a comprehensive capacity to act. The width of the qualifications on each level therefore can only orientate itself at the conditions in each Member State.
6. The EQF in its present form is very complicated. We see that a certain degree of details is needed for analytical reason and is especially necessary for the applying institutions of an EQF in the member states and at European level. For the purpose of practicability however and in order to bring the EQF closer to individuals and companies we need short and easy to understand descriptors of the different levels.
7. The development of national and sectoral qualification frameworks which then can be aligned to the EQF is a difficult and complex process, which in many countries needs the involvement of different ministries, the social partners, branch organisations etc. As the EQF will only be as good as its underlying NQFs and SQFs, this development should be given enough time. A lack of commitment by different players would jeopardize the usability and therefore the relevance of the EQF. As some countries are more advanced than others in the development and implementation of NQFs, it might be practicable to proceed in a multi speed approach and start pilot projects on bilateral or multilateral bases.