INTRODUCTION

The eighteenth meeting of the EQF AG was attended by representatives from 29 countries, representatives of social partners and stakeholder organisations, and representative of the Council of Europe. In addition, representatives of the European Commission, Cedefop, the European Training Foundation, and external experts to the Commission also attended.

Ana Carla Pereira (DG EAC, head of unit A.3 “Skills and qualifications strategies; Multilingualism policy”) chaired and opened the meeting. The agenda was accepted without further comment. The action points of the seventeenth meeting of the EQF Advisory Group on 4-5 December 2012 were also adopted without comment. The draft minutes of the seventeenth meeting had just been distributed and paper copies were made available. Ana Carla asked participants to return comments on the draft minutes by February 11.

Ana Carla informed participants that two additional countries have joined the EQF Advisory Group: Montenegro, and the Former Yugoslav Republic of Macedonia. Representatives of these countries were not present but are expected to attend the next meeting.

1. RELEVANT DEVELOPMENTS IN EUROPEAN COOPERATION IN THE FIELD OF EDUCATION AND TRAINING

Information on developments in the Copenhagen and Bologna Processes

Copenhagen process:

Dana Bachmann (DG EAC, head of unit B.2 "Adult education and vocational education and training") presented the recent developments in the Copenhagen process as well as adult education (cf. ppt).

5 Please note: all meeting documents and power point presentations have been uploaded in the e-community of the EQF Advisory Group:
http://europa.eu/sinapse/directaccess/qualification_framework
Comments, questions & answers (reactions from BE):

- Apprenticeship training has been emphasised in many recent policy documents; when can we expect to receive more concrete information on this initiative?
  
  o COM: Currently there are discussions with DG Employment, stakeholders, and social partners on this. A more concrete proposal will be presented in approximately two weeks. The Advisory Committee on Education and Training will organise a workshop on how to better involve SMEs in work-based learning to be held on 6 March.

Bologna process:

Jean-Philippe Restoueix (Council of Europe) informed the EQF Advisory Group about the following current activities in the Bologna context:

- One of the current challenges in the higher education context is putting structural reforms into practice. Coherence of all tools developed is considered very important and therefore a working group focusing on coherence has been established: Structural Reforms Working Group. The main challenge this working group faces is its size, as all countries participating in the Bologna process have expressed their wish to be involved.
- The next meeting of the network of national correspondents for the QF EHEA will be held on 11 March in Dublin, and will focus on quality assurance and qualifications frameworks.
- Two regional networks on NQF developments have been established: one for South-East European countries and one for SAS countries.
- The subsidiary text of the Lisbon Recognition convention "Recommendation on the use of qualifications frameworks in academic recognition" has been finalised. The text provides guidance on how qualifications frameworks can support the recognition of qualifications in practice in higher education or to access higher education.
- A joint working group on non-formal learning will be established by the education and youth groups. The fact that there are different interpretations of the concept of recognition of non-formal learning in these fields must be acknowledged:
  
  o Education: focus is on ‘formal recognition’ and on how non-formal learning can be validated to achieve this.
  
  o Youth: focus is on transversal competences and on how they can be validated and recognised.

Maria Kristin Gylfadottir (DG EAC – C.1.001) commented on current activities in higher education coordinated by DG EAC (cf. ppt).

Information on latest developments and follow-up to the meeting of the EQF AG on 4-5 December 2012 (cf. Note AG18-1)

EU Skills Panorama

Ricardo Ferreira (DG EAC A.3 Skills and Qualifications Strategies; Multilingualism Policy) introduced the EQF Advisory Group to EU Skills Panorama (cf. ppt) and invited participants to explore it further.

Ana Carla Pereira (DG EAC) informed the EQF Advisory Group how the Commission is planning to move forward on the outcomes of the EU Skills Panorama:

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2 http://euskillspanorama.ec.europa.eu/
• The Commission is engaged in discussions in three areas (these areas are also mentioned in the ‘Employment Package’): ICT practitioners working in different sectors, health sector (an action plan has already been identified in the “Employment Package”), and green economy. The focus on these three areas does not mean, however, that the Commission will exclude discussions from all other sectors. The EU Skills Panorama will be used as one tool to inform processes but political decisions will determine how this information is used.

• Example ICT: At the beginning of March, the Commission will launch a ‘Grand Coalition’ to bring all relevant stakeholders together to discuss the kinds of measures that can be initiated. The aim is to take action to reduce the skills shortage in this area. Measures should be implemented to reduce this gap. The EQF Advisory Group members should have received invitations to join this “Grand Coalition” which will receive a two-year mandate.

• Aside from this there are a number of initiatives at sectoral level; for example, the Commission has just launched such an initiative in the retail sector.

Comments, questions & answers (reactions from BE, FR, NL, Business Europe, PES):

• The question was raised as to how the quality of the information presented on the website is assured. For example, the skill requirements for ‘Nursing and midwifery professionals’ includes ‘a willingness to endure demanding working conditions and unattractive pay’. This kind of information is considered to be inappropriate and should not be presented as a “skills requirement”.
  o COM: Quality assurance is a major concern since the aim is to make data comparable and useful. Nevertheless, in a database with such an enormous amount of information, the inclusion of some odd data cannot be totally avoided. Therefore, it is important that feedback is given as soon as such odd information has been identified. It will then be removed.

• Who determines what is considered ‘odd’ information? The suggestion was made that stakeholders should be closely involved in this process.
  o COM: The information to be included in the EU Skills Panorama is determined by a group of stakeholders, not by a single person. In order to assure quality, the Commission works with a network of national institutions and observatories on the anticipation of skills needs. The role of this network in the development process was the identification of relevant structures. Their future role may include support to quality assurance. Another initiative which ensures stakeholder involvement is the installation of Sector Skills Councils. There has been a delay in the establishment of these Councils, but in the future it is anticipated that their work will be integrated into the EU Skills Panorama.

• Comment from PES: Identification of skills shortage should be evidence based – the question as to how we define this remains open. This is currently being determined. For example, discussions are taking place on whether to also include the average vacancy period. The question on how to identify the ‘bottle necks’ is continuously being discussed.

• Is there a link between the EU Skills Panorama and ESCO?
  o Cedefop: The plan is to use the terminology provided by ESCO in the EU Skills Panorama.
  o COM: These two initiatives are different in nature:
    - EUSP is a tool that is immediately accessible for citizens and practitioners; they can make use of the data and analyses provided.
    - ESCO: is a taxonomy (dictionary) and will not be directly used by citizens;
it can contribute to the matching process and is intended for use by PES and administration.

**Skills Passport**

Pedro Chaves (DG EAC, A.3 Skills and Qualifications Strategies; Multilingualism Policy) made a presentation on the Skills Passport that has recently been introduced as part of Europass. It is an electronic folder in which all certificates, diplomas etc. can be included and is designed to complement the Europass CV in order to present a full profile of an individual’s skills. The number of people viewing Skills Passport in the first few weeks after launch (approximately 11,000) suggests that it is an interesting tool with future potential.

Pedro also drew the attention of the participants towards two other tools that are currently being developed in the Europass context: the European Experience (new document) and the ICT module (as part of the Europass CV).

**Comments, questions & answers (reactions from AT, BE, DE, IT, PES):**

- Is there any link between the e-competence framework and this ICT module?
  - The e-competence framework has been developed for ICT professionals. The ICT module is not specifically for ICT professionals but is designed to allow the general population to indicate their ICT skills (similar to the language reference framework).

  The e-competence framework is far more advanced as its development is based on approximately eight years of work. Discussions are currently taking place in the ICT sector on the possibility of creating a quality label based on the e-competence framework.

- Why should the ICT module be included in the CV and not in the Skills Passport or in the European Experience document? From the perspective of employers/labour market, the information presented in the CV should be clear, simple and any new additions should provide added value. The question was raised as to whether the ICT module fulfils this requirement since certification is more relevant for presenting these skills. In general, it seems more important to present certified evidence of skills, rather than self-evaluations.
  - COM: The ICT module can be included in the standardised CV if a person determines that it is relevant (like other parts in the Europass CV it is optional and can also be deleted). The information on ICT skills presented in the Europass CV is based on self-evaluation. An individual can decide which tool to use for making their ICT skills visible.

- Europass is a tool for presenting profiles in a structured way. The following paradox can be observed: There are many open positions in the ICT sector and many unemployed people; therefore up-skilling is important. But in order to know who needs up-skilling the profile has to provide sufficient information. How can this be solved?

- How are levels conceptualised in the ICT module? Have they been tested? Are they valid?
  - COM: The descriptors of the ICT module are based on those for ICT professionals but have been reduced in complexity to a certain extent. These

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descriptors were developed by the IPTS (Institute for Prospective Technological Studies from the EC Joint Research Centre) and were validated by stakeholders. It must be acknowledged that such a process takes some time (this was also the case for the development of the Common European Framework of Reference for Languages).

- Certificate Supplements and Diploma Supplements are both included in the Europass CV but they are different in nature: the Certificate Supplement is a generalised, institutionalised document and the Diploma Supplement is an individualised document. The merit of maintaining this difference in the future was questioned. Additionally, it was pointed out that the implementation of the EQF and the ECVET will require a restructuring of the Certificate Supplement.
  - COM: There is an on-going discussion within the Commission on how to develop an increased synergy of all EU tools (in practical terms). Some initial thoughts have already been presented in the "Rethinking Education" Communication. The Commission is particularly interested to know which documents are used in national contexts and how they are used, and will engage in a discussion with Member States to identify stronger synergies across different tools. The plan is to launch a consultation process in the second half of 2013 (also based on the evaluation of EUROPASS, EQF and EQAVET). The Commission also intends to implement an impact assessment study.

Ana Carla thanked the participants for their comments and pointed out that the Commission is currently in a reflection phase and that the tools are still in development. Therefore, any feedback received can be taken into account in further development.

Information on Presidencies' programme

Bryan Maguire (HETAC, IE) informed the EQF Advisory Group that the Irish Presidency is focusing on quality and equity.

A conference on quality assurance and qualifications frameworks (addressing VET and HE) will be held in Dublin from 12 (full day) -13 (half day) March 2013. The main focus of the conference will be: How to use qualifications frameworks for quality assurance? The sub-themes of the conference include:

- Role of stakeholders/labour market in quality assurance: How to use quality assurance to promote jobs and the involvement of labour market actors
- International/global issues and international qualifications (e.g.: How is the EQF ‘mirrored’ in countries outside Europe?)
- Recognition of non-formal and informal learning

The conference will primarily consist of plenary sessions (but with coffee table style seating to encourage discussion) and some parallel workshops. A preliminary concept paper based on a research paper drafted by Jim Murray (former Irish representative in the EQF Advisory Group) is already available. Invitations have already been sent to ministries, which were asked to forward these to EQF Advisory Group members. Bryan invited the EQF Advisory Group to contact him or the QQI (Quality and Qualifications Ireland) directly if further information is required. Furthermore, he thanked the Commission for its feedback and suggestions and also thanked colleagues who have already contacted him in relation to the conference.

Vincentas Dienys (LT) briefly gave a brief presentation on the priorities and activities planned for the Lithuanian Presidency (2nd half of 2013) (cf. ppt). The priority of the LT Presidency will be quality and efficiency and will focus in particular on:
• Internationalisation of HE and efficiency of financing
• Leadership in education
• Inclusiveness of VET
• Open educational resources

2. OVERVIEW OF NATIONAL DEVELOPMENTS RELATED TO THE IMPLEMENTATION OF THE EQF

Anita Kremo (DG EAC) presented the updated roadmap on referencing and requested remarks on the referencing plan overview (cf. Note AG18-2 and ppt).

Current status regarding the expected date for the presentation of draft referencing reports (table 1):
• Poland: The report cannot be presented in March since the consultation process needs more time. The presentation was postponed until the May meeting.
• Italy: The presentation of the report at the March meeting was confirmed.
• Bulgaria: The report can probably be presented in March.

Ana Carla Pereira concluded by asking members to send updated information to the European Commission. She also reminded the EQF Advisory Group that the comments on the German EQF referencing report have been distributed, and invited participants to send any remarks on this document to the Commission.

3. INFORMATION ON THE DEVELOPMENT OF NATIONAL QUALIFICATIONS FRAMEWORKS IN EUROPE


They identified the following main challenges:
• How robust and sustainable are the NQFs?
• Is there room for more than one NQF in each country – how loose/rigid should frameworks be?
• Is increased use of learning outcomes bringing us closer to a shared language to be used across levels and types of qualifications?

In relation to the question on how robust and sustainable the NQFs are, Ana Carla Pereira (DG EAC) added an additional question for consideration: What kind of support can the European Commission provide to assist the development of NQFs?

Comments, questions and answers (reactions from CZ, BE, BG, IE, FR, IT, LT, LU, MT, UK, CoE):

General feedback on the report:
• In general, the forthcoming report was appreciated. The inclusion of a summary on the main findings that can be distributed to a wide group of stakeholders (since 400 pages might be too much for them) was suggested.
  o Cedefop: A short synthesis will be included.
Participants requested more details on NQFs (for example, on the situation in CZ without NQF).
  - Cedefop: The report itself provides more detail and it is possible to have in-depth discussion on certain aspects at a later stage.

Definitions are needed:
- What are the characteristics of NQFs that are ‘incomplete’? What does this mean?
- The meaning of ‘formal qualification’ differs between countries. For example, in Belgium/fr, they comprise only those qualifications issued by the Ministry of Education, whereas in Belgium/fl they comprise qualifications recognised by the government and can be issued by various ministries.
  - Cedefop: Definitions will be included in the final version of the report.

Link between NQFs and non-formal and informal learning:
- The conclusions of the PLA in Warsaw state that NQFs can be catalysts for the validation of non-formal learning. Is there any additional evidence on this link between NQFs and non-formal learning? Additionally, the question was raised as what the phrase ‘NQFs as catalysts’ actually means and what kind of procedures this might entail. The suggestion was made that next NQF monitoring report should investigate this link in more depth, along with an exploration of the ‘side effects’ of NQFs. Furthermore, undertaking a more targeted thematic discussion on this issue was suggested.
  - Cedefop: NQFs are primarily used as catalysts in this context: Their focus on learning outcomes seems to motivate countries to take up the challenge of validation of non-formal and informal learning. However, the study did not focus on this aspect and consequently gathered little evidence on this. Further research into this topic will be conducted in future (in relation to the Recommendation on the validation of non-formal and informal learning).

NQFs at different stages of development/implementation:
- It was pointed out that it is important to distinguish between plans/intentions and actual implementation in this context. Very few countries (such as France or the UK) have procedures already in place. Most countries remain at the planning stage, with more or less developed plans, and with little evidence of implementation and the impact.
  - Cedefop: We also need to look at intentions and observe how they might change over time. This is an important aspect in order to understand how processes evolve. Countries other than France and the UK have put procedures for validation in place. This will also be shown at the next PLA in Sweden.
- How can we determine whether frameworks are opening up the divide between sub-sectors or whether they actually stabilise this divide?
- There is a need to acknowledge the different starting points and approaches in different countries: For example, some countries begin with empty frameworks, whereas others have yet to adopt an NQF but have put in place initiatives for redefining qualifications. Indeed, in this case the process may be quite advanced, even without the use of an NQF. Validation, for example, can take place independently from NQFs. The suggestion was made that it is important to explore these aspects in more detail and to develop relevant criteria for identifying the different approaches countries adopt (e.g. some may focus more on ‘products’ – such as the NQF – and others on processes – such as procedures for validation).
Furthermore, it is important to develop a process for evaluating the progress of countries in this regard. The EQF/NQF should be seen as a tool to support processes but not an end in itself.

- The CZ representative explained the approach in the Czech Republic: A qualification framework for vocational qualifications (linked to validation) has been developed, as well as a framework for tertiary education. Currently, however, there is no comprehensive framework but one may be established in the future.
- The BG representative informed the EQF Advisory Group that, although the Bulgarian NQF was established only very recently, and the use of levels is not yet mandatory, higher education institutions already utilise them as a form of quality label.
- When evaluating the progress made in different countries it is important to take both the Recommendation and the EQF referencing criteria into account. For example, countries such as the Czech Republic have taken an approach suggested by the Recommendation and EQF referencing criteria (linking the system to the EQF and not an NQF). The referencing process is also affected by the internal political environment within respective countries, which must be taken into account in the choice of an appropriate approach. In general, the entire process tends to take longer than initially anticipated.
- Many of the challenges identified in the implementation of NQFs are similar to those experienced in the Bologna process. It is important to examine how frameworks have been put into practice. For example, how are the levels and learning outcomes taken into account in the teaching process and in teacher training? There is still much progress to be made.

Potential risk of ‘forgetting’ EQF/NQFs:
- ‘The biggest danger is that countries will ‘forget’ their NQFs when the formal referencing to the EQF has been finalized.’ (last sentence on p22 of the Annex to note AG 18-4) – On what basis has this conclusion been drawn?
  - Cedefop: There is some danger that frameworks may remain empty and that they have been developed simply for participation in the EQF referencing exercise.
- The UK representative pointed out that England and Northern Ireland can be considered to possess mature frameworks but the NQFs are becoming ‘invisible’, i.e. level descriptors become invisible but the level is indicated in the qualifications register.
- In Malta, there is a danger that the EQF will be forgotten. There are also questions on what should be communicated on the national level, and how this process should be undertaken.
- The point was made that the EQF is an important signal for the labour market and should therefore not be forgotten.

Possible support from the Commission:
- The Lithuanian example suggests that in order for NQFs to be sustainable, the responsible bodies must also be stable. Lithuania has carried out the referencing process in accordance with the Recommendation. In order to secure a commitment to the NQF and referencing process from the new government, it is important to stress that these initiatives are on-going processes.
  - COM: The Commission could take action in order to maintain momentum on the initiatives if countries feel this would be useful.
Additional issues:

- There is a need to start focussing on quality assurance.
- The EQF Advisory Group must consider how to deal with a review of NQFs.
- Interpretation of the learning outcomes approach: outcomes and inputs are sometimes combined in the process of classifying qualifications in an NQF. Does this mean that the ‘zone of mutual trust’ is not necessarily guaranteed by NQFs themselves?
  o Cedefop: There is a great diversity on how the learning outcomes approach is used across different countries.
- Role of NQFs in education and training policies: Is there any evidence that suggests that the development of NQFs leads to an imbalance between education orientation and labour market focus? Does the development of NQFs produce a tendency towards one particular area?
  o Cedefop: Currently, NQF development tends to be influenced primarily by education and training. However, frameworks are to some extent also now opening up to the labour market.
- Is there any information available on different approaches in the areas of lifelong learning and youth work?
  o Cedefop: We currently do not have any evidence.

Ana Carla summarised the main issues addressed during the discussion:

- ‘post referencing’: Once the referencing process has been completed – how can we move forwards? How can quality assurance be addressed? – There is a need to reflect the kind of support that could be provided at EU level to assist in this process and how it could be implemented. There is a risk that there will be no further development in some countries (for example, when the process is linked to political cycles and not embraced by new ministers). What could the EQF Advisory Group or other groups do to tackle this issue?
- How do we understand progress? NQF implementation and EQF referencing are not the only relevant indicators of progress. – Maybe the concept of progress can be addressed by Cedefop as a follow up to the NQF monitoring report. It would be interesting to develop a mapping in relation to different progress criteria.

Jens and Slava thanked participants for their comments which will be taken into account as much as possible. They explained that the focus of the previous study was the impact of NQFs. A new version of the study report will be published by the end of this year and in which focus can be placed on issues discussed at the meeting. Some key cross-country issues have already been identified in previous reports but it is also recognised that there is a need to investigate certain issues in more depth, and to gather more evidence on certain aspects. In general, however, there is no doubt that country reports produced over the last four years demonstrate that progress is being made.

4. 4. – COMMUNICATION ON AND BRANDING OF THE EQF

Anita Kremo (DG EAC) introduced the topic of the communication and visual branding of the EQF (cf. Note AG18-3). She invited the EQF Advisory Group to discuss

- the proposed timetable (is it realistic and compatible with national plans?),
- the conditions proposed for the use of the EQF logo.
Comments, questions & answers (reactions from AT, BE, CZ, DE, IE, FI, FR, LV, MT, UEAPME):

General comments:
- In general, participants welcomed the communication.
- Some participants clearly stated that protecting the reputation of the EQF and preventing misuse is very important. Experiences from Ireland, for example, suggest that that protection of the brand is increasingly important as the NQF becomes more popular.
  - COM: If we want to use the EQF logo on certificates, protection measures are needed. Copyright is a very powerful tool: if one holds the license, one can also take action against misuse.
- The misuse of the EQF logo on websites also needs to be considered.
- Is the use of the EQF logo necessary on certificates, or is the indication of levels (together with the EQF acronym) and perhaps the NQF logo sufficient? In some countries, for example in France, using the EQF logo on certificates would be a complex process. As there are also other initiatives with their own logos (such as ECVET, ECTS, EQAVET), certificates and diplomas could include a large number and variety of logos.
- Will the existing logo be used? Some participants suggested including the respective level in the existing logo.
  - COM: Logo and levels could be protected separately. We must also consider the possibility that the number of levels in the EQF may change.
- What happens when some NCPs/countries decide to use the logo on certificates and others not? What does this mean for equal treatment of students across Europe? Germany, for example, will currently use the logo only on promotional materials, not certificates.
  - COM: Indicating the EQF level on certificates and diplomas is part of the Recommendation. The intention is to enhance transparency across countries but it is not compulsory. EQF levels are particularly important in order to achieve this goal.
- The Commission is the owner of the license and may sublicense the use of the EQF logo to the Member States. But it should be avoided that the Commission uses the logo in other contexts, such as for the levelling within frameworks of professional sectors (like for example the e-competence framework) or for the levelling of separate skills/competences (in the context of ESCO). Therefore, the establishment of a Memorandum of Understanding between the Commission and Member States was suggested.
- Is the development of any licensing mechanisms anticipated for sectoral or European organisations that wish to use the EQF label? The suggestion was made that a Memorandum of Understanding could be established between the Commission, Member States and sectoral/international organisations to allow for the use of the EQF label (to prevent bilateral agreements between the Commission and sectoral/international organisations).
  - COM: It is important to keep in mind that the EQF logo is used in the context of referencing to the EQF. At the moment, there is no procedure for a direct link between international qualifications and the EQF. Nevertheless, international qualifications may be included in NQFs.
• The issue of how to deal with international qualifications was raised: for example, Microsoft certificates are included in the Irish NQF but not in the French NQF. The point was made that this topic was discussed three years ago but this debate did not lead to the formulation of conclusions or action. Therefore, international qualifications may be linked to the EQF via different NQFs and subsequently be placed on different EQF levels. This issue must be addressed – it cannot be ignored - and the suggestion was made that this issue could be examined by a working group.
  o COM: In order to understand better the issue of international qualifications the Commission will ask EQF Advisory Group members for informal feedback on this topic. This issue is linked to the EQF logo but goes beyond this specific topic. The suggestion was made to address this issue in more detail at the meeting in March or May.

Timetable:
• The proposed timetable was accepted.
• Must countries that have already completed referencing wait before using the logo?

Conditions:
• ‘Qualifications systems’: The comment was made that that the wording should respect the fact that entire systems are not necessarily mirrored by an NQF.
  • Point 2: ‘The project scope’ (p2 of Note AG18-3): A change to the wording "project2 was suggested since this is downgrading the whole approach.
  • Point 3 - the licensee: In some countries NCPs are closely linked to ministries, and in others they have a more independent role. The suggestion was made that the Commission should consider other potential partners with regard to licence agreements. The implications of these procedures must be discussed with legal experts at national level.
    o COM: It may be possible for national authorities to invite NCPs to sign the agreement on their behalf. Countries are invited to inform the Commission about the most appropriate counterparts for them in this context.
  • Point 4: ‘The EQF emblem may be displayed in promotional materials of awarding bodies whose all qualifications are referenced to the EQF or education and training providers that only offer programmes that lead to EQF referenced qualifications’ (p3 of Note AG18-3): The meaning of this is unclear. In several countries, for example in Finland and France, the same providers offer qualifications that are included in the NQF, as well as others that are not.
    o COM: The reason that this aspect is formulated in this way is that these institutions may use the EQF logo for qualifications that are not included in the NQF. This must be avoided.
  • Point 5: The logo cannot be modified, but can it be translated into national languages? Must the English version be used universally?
    o COM: It is debateable as to whether translation is needed. The visual identity of the NQF is used at national levels, the EQF logo is used across countries (transnationally).
  • Point 6 – sublicensing: ‘the use of the EQF emblem by third parties at national level could be defined via national legislation or specific licence agreements’ – Participants mentioned that a wider role for national authorities would be preferable.

Ana Carla concluded by asking members to send feedback on the conditions in the proposed note within two weeks.
5. **Peer Learning Activities Supporting EQF Implementation**

Proposal for a two-year work programme for strengthening coordination on learning outcomes (cf. *Note AG16-6*)

The proposal was adopted without further comment.

Proposal for a PLA on including qualifications from outside formal education and training systems into NQFs, 28 February – 1 March 2013, Vasteras, Sweden (cf. *Note AG18-7*)

Carina Linden (SE) briefly introduced the structure of the PLA and reminded the EQF Advisory Group to complete the short questionnaire, developed as preparation for the PLA, by February 15.

Anita Kremo (DG EAC) explained that this PLA will contribute to the discussion on definitions of ‘non-formal qualifications’, ‘formal qualifications’ etc. She also asked participants to send any relevant material to the Commission (for example, documentation about criteria and procedures on the inclusion of above qualifications in NQFs).

**Comments, questions and answers (reactions from CoE):**

- **How far will the challenge of ‘diploma mills’**\(^4\)** be taken into account at the PLA? This is a challenge for ENIC/NARIC in the context of academic recognition.**
  - **SE:** This topic has not been explicitly considered in the preparation of the PLA but will be addressed when discussing quality criteria for inclusion.

6. **Recommendation on the Validation of Non-formal and Informal Learning**

Koen Nomden (DG EAC A,3 Skills and Qualifications Strategies; Multilingualism Policy) introduced the revised Proposal for the role of the EQF AG in the implementation of the Council Recommendation on the validation of non-formal and informal learning (cf. *Note AG18-8*). He noted that the Proposal explicitly states that the referencing criteria and procedures will not be changed and that validation goes beyond referencing. The changes made based on the discussions in the last EQF Advisory Group meeting and the written comments include:

**Ad.1.2 ‘The role of the EQF AG in the follow-up to the Recommendation on validation’:**

- **1. Monitoring:** ‘Until 2018 each Member State is invited to present to the EQF AG its one off report on the validation arrangements they have put in place further to the Recommendation’ (p4, 1st bullet point): only one report is expected to be presented by 2018
- **1. Monitoring:** ‘EQF AG Members are invited, on a voluntary basis, to regularly share experiences on the validation arrangements put in place, or under development

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\(^4\) A ‘diploma mill’ is an unaccredited institution of higher education that issues degrees without ensuring that students meet qualification standards.
in their country at any time when validation is part of the EQF AG's agenda.’ (p4, 2nd bullet point)

- 2. Cedefop reports – ‘Purpose: every second annual review of the implementation of National Qualification Frameworks, Cedefop analyses how and to what extent validation of non-formal learning is part of national qualification frameworks’; Timeline: an initial review including validation will be prepared in 2013’; (p4, 1st and 2nd bullet point)

- 3. Review of the European Guidelines: The Guidelines and the Inventory (providing evidence on practice) are seen as a common package (p4)


- 4. Inventory: The contract will probably be concluded soon.

- 5. PLA: no changes compared to the previous version.

Ad.2 ‘Organisation and working methods of future meetings of the EQF AG in the light of the Council Recommendation on validation’:

- 2.1 Future meetings of the EQF AG discussing validation: ‘If different points related to validation of non-formal and informal learning are part of the Agenda, the Commission shall make efforts to concentrate these in e.g. one morning or one afternoon session.’(p6)

- 2.2 Participation of youth organisations and representatives from the voluntary sector. ‘The European Youth Forum and the European Volunteer Centre will participate in EQF AG meetings which address the validation of non-formal and informal learning’.

- 2.3 Revised mandate of the EQF AG: ‘Make it possible for countries to send two representatives to EQF AG meetings; Foresee the participation of the European Youth Forum and the European Volunteer Centre.’

Comments, questions and answers (reactions from AT, BE, UK):

- In general, the changes made were welcomed and the new proposal accepted.

- Cedefop monitoring reports: The fact that developments and progress made in relation to validation is not only linked to NQFs, and that this must be taken into consideration, was pointed out. If validation of non-formal learning is not part of an NQF this does not necessarily mean that countries which possess this characteristic perform badly in relation to validation.

- Reports on validation from Member States in 2018: The question was raised as to whether this timeframe is too generous. The experience of the EQF referencing process demonstrates such a process can be carried out at a high political level (for example, in Austria) and with great dedication.
  - COM: The Recommendation calls on Member States to construct their validation systems by 2018. An interim reporting phase was not anticipated, but could be considered should Member States believe it helpful for supporting their national processes.

- The question of whether an additional report is necessary, or whether the Inventory could be used for this purpose (since it will also be structured according to the main principles as formulated in the Recommendation), was raised.
  - COM: The experience from the EQF referencing reports shows that the added value is not (only) the reports themselves but those processes triggered by the reports. This is probably not the case with the Inventory.
• Two representatives to EQF AG meetings: Concerns were expressed that it may be difficult to work in a group of this size (since the number of the current EQF AG representatives will be nearly doubled).
  
  o COM: For administrative reasons (to enable reimbursement for delegates) additional experts must be nominated and registered. This does not mean, however, that two delegates must be present at each meeting. It is up to the Member States to make this decision.

Ana Carla Pereira (DG EAC) concluded that at the next meeting: a template/structure for these reports will be presented (it will be closely based on the Recommendation); the mandate for the EQF Advisory Group will be revised; and new members will be invited to participate.

7. NATIONAL DEVELOPMENTS RELATED TO THE IMPLEMENTATION OF THE EQF – COUNTRY CASES

Andreas Eleftheriou (CY) made a presentation on current developments in Cyprus related to the NQF and the EQF referencing process (cf. ppt).

Comments, questions and answers regarding the CyQF (reactions from IE, MT, NO, UK, Cedefop, CoE):

• Scope of the NQF – link to validation of non-formal/informal learning: The NQF is a comprehensive framework, including qualifications from the formal system as well as other qualifications (as a distinctive part of the NQF – called ‘System of Vocational Qualifications’ and linked to levels 2-6 – cf. ppt, p5). How are these qualifications seen in relation to qualifications from the formal system? What is their value in further education? Are any discussions being had on placing these qualifications on higher levels? Is learning at the work place understood as informal learning and called VET? Are there other VET qualifications?
  
  o CY: These qualifications are only linked to levels 2-5. They are acquired through non-formal/informal learning which is understood as learning at work that is evaluated by a specialist at the human resource development authority. Learners receive credits and can obtain a work-based qualification. Many companies offer work-based learning and a form of apprenticeship training. School-based VET qualifications are offered at technical schools.

• In Cyprus, post-secondary education is being developed around level 5 – What types of qualifications are being developed? Will there be Credit transfer to Bachelor programmes?
  
  o In recent years there has been a gap between upper-secondary level education and higher education, and the decision was taken to narrow this gap through the development of new qualifications. These qualifications are for specialists – ‘well educated technicians’. They are offered by the Ministry of Education and graduates can obtain credits that allow them to continue their studies. Higher national diplomas are offered primarily by private colleges (not by state universities)

• Validation of non-formal and informal learning: Will other qualifications also be awarded based on validation?

• Procedures for including qualifications (criterion 4): Two procedures are mentioned: one for qualifications regulated by the ministry and one for qualifications regulated
by industry organisations. Have these qualifications already been included in the framework? What are the criteria for inclusion?
  o CY: The NQF is under construction; qualifications are not yet included.
• In Cyprus, there are also many qualifications which are validated by UK universities. Will they be included in the NQF?
  o CY: All British university degrees are recognised in Cyprus.

Discussion on the role of international qualifications or qualifications regulated/awarded in other countries: (reactions from FR, IE, LV, MT, UK):

• There is a difference between the recognition advice given by NARIC and what is recognised in the NQF; this potentially causes confusion for learners. In Ireland, for example, as soon as the NQF came into use, questions were raised as to the status of UK-awarded qualifications.
• For example, the higher national diploma is a British qualification that is also offered by private organisations in other countries (such as Malta). They are often viewed as first year Bachelor programmes. Originally developed for the labour market, they are now increasingly used as tracks into higher education.
• In Malta, the BTEC will be transformed into a foundation degree. The value of international degrees is currently a significant issue in Malta due to recognition problems. ENIC/NARIC must deal with this situation. The issue was raised by employers: individuals are able to obtain certain qualifications rather quickly and the standards of some international qualifications are lower than the national standards. There have already been cases in which the MQF level has been used without official permission: the MQF level 6 was included on a diploma from the University of London (Trinity College) without any communication or agreement with Maltese authorities.
• Many universities are now opening branches in other countries. What is the value of qualifications obtained in these branches in the national context? This is a challenge that higher education will face in the near future, particularly in smaller countries. The Maltese examples demonstrate that brand protection in relation to the NQF is important.
• OECD and UNESCO have developed guidelines on good conduct in cross border higher education (including responsibilities) – Consultation of these guidelines was suggested.
• ENIC/NARIC have already undertaken significant work in this context. Occasionally these organisations face legal challenges and claims that they do not have the right to reject recognition of a diploma. This expends time and resources, and it is students that suffer the most in this situation.
• Examples were presented on the lack of quality assurance procedures related to international qualifications:
  o UNESCO chairs can issue diplomas but there is no guarantee of quality assurance.
  o British university programmes are subject to quality assurance, but since the higher diploma offered outside UK is not subject to such assurance procedures national quality assurance procedures have been established in Ireland.
  o Private companies offer international qualifications.
• As similar problems can be observed in several countries and international qualifications will be included in ESCO, the issue of international qualifications and quality assurance must be addressed carefully. Again, participants commented that
Ana Carla concluded that Cyprus appears to possess a number of specific characteristics which has an impact on the implementation of the NQF and referencing to the EQF. The referencing report should be as pedagogical as possible and clarify concepts and definitions to avoid misunderstanding. The presentation on the current state of developments in Cyprus has triggered an interesting discussion on international qualifications. The importance of returning to this issue at the next meeting was emphasised.

8. **EQF portal developments**

Karin van der Sanden (DG EAC) presented ‘Information on the users' survey of the EQF and Ploteus portals’ and informed about the survey on the mapping to ISCED thematic areas (cf. ppt).

**Comments, questions and answers (reactions from BE, CZ, FR, HU, IT, NL, UK, PES):**

- Three countries responded that they have no plans to undertake the mapping.
  - What is the reason for this decision? It is important to explore the reasons. Is it possible that this decision is based on a misunderstanding? Which countries have made this decision? Have they completed the referencing process?
    - COM: Reasons were not specified. It was not possible to name the countries in question or provide information on the status of their referencing process at the meeting. This information, however, can be gathered from the data collected.
- The results of the survey must be interpreted carefully because although countries may wish to connect their qualifications databases with the EQF portal, they may not wish to use ISCED thematic areas.
- IT has volunteered to participate in testing activities. They use other classifications on a national level and the feasibility of matching them to ISCED thematic areas will be tested.
- NL is among the countries that did not respond to the survey because it is expected that there will problems with the database for higher education.
- Some representatives highlighted the importance of the EQF portal. However, the fact that the referencing criteria include the requirement to publish the results of the referencing process, but do not refer to the portal was also raised.
- Is there a link with the ‘Match and Map’ project (Ploteus is linked to it)?
  - COM: No, there is no link. ‘Match and Map’ is a DG EMPL project; the activities coordinated by DG EAC are independent initiatives.
- The suggestion was made that a discussion with regard to quality assurance of the portal could be undertaken. The French representative explained that Ploteus has been a financially costly and wasteful project and these costs should be avoided if possible in the development of the EQF portal.
  - COM: The Commission confirmed that quality assurance is an issue that will receive appropriate attention. Quality assurance of Ploteus was also a topic of the EQF portal and Ploteus group meeting. Measures will be taken to enhance the quality of Ploteus.

Ana Carla Pereira (DG EAC) summarised that the context of the questionnaire has to be taken into account when interpreting the results. She also confirmed that the responses of
the three countries that rejected the mapping to ISCED thematic areas will be investigated more thoroughly in order discover the motivations behind this decision.

9. LATEST DEVELOPMENTS IN ESCO

Koen Nomden (DG EAC) briefly made a brief presentation on the concept of ESCO and its current state of development, (cf. ppt) and Jens Bjornavold (Cedefop) updated the EQF Advisory Group on the most recent developments (State of play of ESCO development - cf. AG18-5):

- Information on the quality assurance of the ESCO development process: A complex approach has been adopted for quality management of the project. The ESCO Board and the ESCO Maintenance Committee are responsible for overseeing the entire project. Currently, a quality management plan is being developed alongside the ESCO Guidelines (they will support terminology issues, language issues etc.).
- Qualifications pillar international/sectoral qualifications (direct inclusion): The data model is currently being tested. Obtaining this information is quite challenging but it is important to have sufficient data for international/sectoral qualifications. It is also important to ensure that these qualifications can be trusted. There is a wide range of qualifications outside the NQFs but it is difficult to determine those that can be trusted, and those that are fraudulent. Which sources can be trusted? Cedefop is currently working with an external contractor to tackle this issue. In the spring, an initial list of collected qualifications will be made available. These qualifications will be discussed in the Sector Reference Groups. The results will also be presented within these groups.

Mile Dželalija, HR; vice chair of the Cross-Sectoral Reference Group (CSREF) commented on the activities of the CSREF

- The group is comprised of highly motivated experts with different backgrounds from different countries. Two EQF Advisory Group members are also involved in the CSREF.
- Four meetings have been held so far.
- Further dialogue with Sector Reference Groups is anticipated in order to discuss whether the terms identified by the CSREF are useful for their purposes.
- The CSREF has developed a draft structure and thesaurus for the transversal (cross sector) skills/competences to be used in ESCO v0. The structure consists of the following categories: Application of Knowledge, Language skills/competences, Thinking skills/competences, Social skills/competences and Attitudes and Values at work. Guiding principles for further work have also been agreed (for example, terms that have a ‘levelling’ property – such as ‘basic’ or ‘advanced’ – have to be excluded for now).
- During previous meetings the terms knowledge, skills and competence (KSC) were discussed; the consensus is that the only way to come to a common understanding of these terms is use the EQF definitions.

Wilfried Boomgart (BE; Member of ESCO Board) presented his perspective on the current state of ESCO development:
In the ESCO guidelines, the definitions of skills and competences are based on the definitions used in the EQF Recommendation, i.e. ‘skills’ has a narrower meaning and ‘competence’ a broader meaning. In the first phase of ESCO ‘skills/competences’ was used. But as ESCO is now entering a more technical phase, it is important to clearly define terms to be used in search engines and to adhere to the agreed definitions. Currently there is some confusion:

- In the CSRG, these terms are sometimes used synonymously and sometimes separately.
- At high political levels, ‘skills’ is used as a broad term.
  - COM: The European Commission used the terms ‘competences’ or ‘skills’ in political documents because in many contexts a distinction between the two is unclear. The Skills/competences pillar in ESCO will contain both, skills and competences without, for now, creating a distinction. A proxy can be used.
- In the past the definition of ‘knowledge’ was changed in the ESCO glossary.

It is important to closely follow such processes and react promptly. If this does not occur, windows of opportunity may be missed (Wilfried mentioned recent developments related to the Amendment of the Directive 2005/36/EC as an example of this: Article 49 included a reference to EQF levels but in the report from the Parliament received last week this reference was deleted. This report also focuses on ‘skills’ in terms of employment and not on qualifications).

There is currently a difference between how terms are used in education and training (KSC), and how they are used in the Reference Groups (S/C). Knowledge should also be focussed earlier in the Referencing Groups.

In section 3.5. of the discussion note (Annex to AG 18-5: ‘Skills and competences and the learning outcomes approach – linking education and the labour market’), the tension between the learning outcomes approach and the S/C approach is explained. The IT-sector is used as an example to illustrate this point. When the aim is to find individuals whose profiles provide an approximately 80% match to vacancies, it may be better to use more general terms (like learning outcomes) rather than very detailed functions and tools that are mentioned within ESCO under the category skills/competences.

Terms expressing a ‘level’ should not be used because it might encourage SRGs to discuss wages etc.

In the occupations pillar there is a reference to tasks; this could also be a link to learning outcomes.

The direct link from the S/C pillar to Ploteus seems to be very problematic, as for the moment there are almost no direct links between learning opportunities/courses and learning outcomes available. Indirectly there could be a link by connecting learning opportunities/courses to qualifications, and qualifications to S/C.

The EQF level is one category of the proposed data model. Footnote 4 on page 3 – ‘Most of the qualifications directly included are not levelled to a NQF or to the EQF. The category is introduced to cover those exceptional cases where such a reference exists.’ – could encourage some members of SRGs to link international/sectoral qualifications, such as the welding certificate, or qualifications from the fitness or hairdressing sector, to the EQF. These sectors have received subsidies from the European Commission to develop frameworks and have tested them. They may believe that it is possible for them to use the EQF logo and access the EQF via the activities of SRGs.
  - COM: The issue of international/sectoral qualifications certainly must be addressed. This seems to be a broader issue as it is also appears in the relation to ESCO as well as the EQF label.
Comments and questions (reactions from CZ, HU, FR, IT, SK, PES):

- **ISCO**: Are there any plans to connect ESCO with ISCO?
  - Cedefop: ISCO is the basis for the occupations pillar of ESCO.
  - COM: SRGs have been given the existing ISCO structure for further detailing it.
- **Terminology/definitions of skills and competences**:
  - Several participants agreed that this important issue must be discussed because these terms are used differently. For example, in OECD studies, these terms are used synonymously. On national levels (for example, in CZ) there are also on-going discussions regarding terminology. ESCO is a taxonomy that is based on other taxonomies and individual countries may use their own taxonomies.
  - It was emphasised that the categories and definitions used in the EQF represent the result of a compromise across different systems. It is important to preserve what has been achieved already and to adhere to the glossary.
  - The organisation of a PLA for sharing experiences on the use of taxonomies was suggested. A PLA would also provide an opportunity to carry out tests in specific common sectors to explore to what extent terminologies used in different contexts and countries correspond with one other.
    - COM: ESCO is a taxonomy. Therefore, the use of terms within ESCO must be very rigorous as this determines the quality of the entire project.
    - Cedefop: The purpose of the discussion note (Annex to AG 18-5: ‘Skills and competences and the learning outcomes approach – linking education and the labour market’) is to express the need for clear definitions. We must insist that these definitions are applied in all pillars of ESCO.
  - **Ploteus**: The link between ESCO and Ploteus is important for PES: PES are interested in using ESCO for matching purposes. In the event of an open vacancy, first a PES will attempt to find an ideal profile, and then to find the most suitable candidate via ‘soft matching’ (to what percentage does a person match the ideal profile for this position?). Since there is quite often a skills gap they need to identify candidates for up-skilling. ISCO cannot be used for this purpose, but ESCO should support this process. As soon as the area for up-skilling has been identified, Ploteus could be used to search for suitable learning opportunities.
    - COM: The link to Ploteus is fundamental but needs to be developed further.
- **PIAAC**: The PIAAC project includes a real-life survey that also focuses on skills and competences. A huge amount of data will be made available. The suggestion was made that it may be possible to connect real-life data with the theoretical approach used in ESCO.

Ana Carla Pereira (DG EAC) informed the EQF Advisory Group that the mandate for the ESCO Board has been prolonged for one year. Wilfried Boomgaert and James Calleja were invited to represent the EQF Advisory Group for this additional year.

10. **INFORMATION ON DEVELOPMENTS IN THE IMPLEMENTATION OF ISCED 2011**

Marta Beck-Domzalska (EUROSTAT) informed the EQF Advisory Group on ISCED 2011 developments (cf. *ppt* and *note distributed at the meeting*).
EUROSTAT’s main objective is to collect comparable data from all EU Member States that can be used as a basis for policy decisions (in particular for the monitoring of the EU2020 headline indicators).

Comments, Questions & Answers (reactions from BE, DE, FR, IE, LU, LV, MT, UEAPME):

- Since the note was only distributed at the meeting participants pointed out that they had no time to read it.
- Several concerns were raised regarding the consideration of non-formal learning in ISCED:
  - The previous ISCED (ISCED97) focused on formal programmes and the main criteria were status of provider and duration. A distinction was made between VET and HE. The question as to whether there has been a meaningful shift towards content-based criteria with ISCED 2011 was raised. ISCED 2011 appears still to focus largely on the duration of the educational programmes.
  - Since 2001, in all policy documents the terms ‘education and training’ are used (instead of ‘education’ only) and ‘training’ also includes formal and non-formal vocational training. ISCED, however, has not taken this approach.
  - Since ISCED focuses on formal education, the statistics that are supposed to form the basis for political decision making are biased as they exclude important part of non-formal education. When more countries have implemented procedures for the validation of non-formal and informal learning this will become an even greater problem.
    - EUROSTAT: In ‘educational attainment’ statistics under ISCED 2011, the highest diploma obtained does not necessarily have to be from formal education. The qualifications recognised as equivalent to those from formal education will be taken into account as well.

- Link between ISCED and EQF:

Some participants emphasised that there is no direct link between these two tools because they differ in nature and are designed for different purposes:
- ISCED is a statistical tool whereas the EQF has a broader purpose and is based on learning outcomes and on a Recommendation.
- ISCED classifies mainly formal educational programmes and related educational attainment whereas the EQF is open to qualifications from all areas. For example, in Luxembourg, many qualifications gained in non-formal learning contexts will be linked to higher levels in the NQF, but will not be incorporated into ISCED.

Other participants insisted that there should be a link between ISCED and the EQF (but not necessarily a direct one), or at least that they should not be completely separated:
- for example, in Ireland, the NQF level is used in the national labour survey. In the future, citizens will probably be aware of their NQF/EQF level and relate to it.
- In Latvia, the development of a link between ISCED and EQF levels is being considered because statistics are needed for education development and for the NQF. They have already started to cooperate with the national statistical office.
- In Malta, for example, attempts have been made to bridge ISCED and the NQF. They did a head count and prepared statistics based on data collected. If the tools are not linked, different data will be produced and different interpretations will be made.
For example, the head count produced a more accurate indicator of the situation with regard to early school leavers than the labour force survey.

- COM: It is a risk to link the two tools but attempting to develop a perfect system could take fifteen years. Therefore, it suggested that solutions are sought for data collection.

- Example of master craftsman: In Germany, this qualification is allocated to level 6 based on learning outcomes. ISCED cannot overrule this decision. Duration should not be the decisive criteria and ISCED cannot define the EQF level. In France, for example, the master craftsmen qualification is linked to level 5 and it is clear what kind of learning outcomes would be required in order to link it to level 6. The fact that qualifications with the same titles do not necessarily contain the same content in different countries must be acknowledged, and that we do not need to achieve equivalency or harmonisation across Europe.

- Participants emphasised that the most important concern should be to maintain the ‘qualifications strength’ of countries. Sometimes the link between statistics in ISCED and data on qualifications from other surveys on labour market is not clear. This experience could now be used to improve implementation of ISCED 2011.

- Participants articulated a vision that in fifteen years EQF statistics could be used for monitoring the strength of qualifications in European countries.

  - COM: The question is: How can this vision be realised? Should statistics on EQF complete or replace those on educational attainment? How can we move forward step-by-step?

Ana Carla Pereira (DG EAC) concluded that two fundamental questions need to be considered: Is there any interest in data on EQF levels (for monitoring the EQF in the future)? If so: What would be the link between statistics on educational attainment and statistics on EQF? She invited members to send written comments on the subject by 22 February.

11. CONCLUSIONS AND AOB

Ana Carla Pereira (DG EAC) informed the participants that Pedro Chaves is now responsible for the EQF NCPs. The Commission is now dealing with the final reports of the grants from 2011. NCPs are invited to contact the Commission directly in the event of any problems.

Deadlines:
- 15 February 2013: Return questionnaires produced in preparation for the PLA on including qualifications from outside formal education and training systems into NQFs (28 February – 1 March 2013, Vasteras, Sweden – cf. Note AG18-7)
- 22 February 2013: written comments submitted to the note on ISCED
- Within two weeks: feedback submitted on the conditions in the proposed note on the EQF label
- 31 March 2013: Deadline for the global consultation launched by UNESCO on ISCED thematic fields. Ministries of education should have received invitations.

Upcoming dates:
- 29 February- 1 March 2013, Sweden, PLA on criteria for including qualifications outside formal systems in NQFs
- 12-13 March 2013, Dublin: Irish Presidency conference
- 13-14 March 2013, Dublin, 19th meeting of the EQF Advisory Group
- 9-10 April 2013, Mechelen (BE): Stakeholders Conference on the implementation of the Council Recommendation on the validation of non-formal and informal learning
- 11-12 April 2013, Brussels, NCP meeting
- 29-30 May 2013, Brussels, 20th meeting of the EQF Advisory Group
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<td>National Institute for Vocational Education and Training</td>
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<td>Mr Mike COLES</td>
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<td>Mr Thomas MAYR</td>
<td>UEAPME Insitute for research on qualifications and training of the Austrian economy</td>
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<td>Ms Agnes ROMAN</td>
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<td>Mr Wolfgang MÜLLER</td>
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<td>Expert</td>
<td>Mrs Karin LUOMI-MESSERER</td>
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<td>Mr Jens BJORNAVOLD</td>
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<td>Mrs Marta BECK-DOMZALSKA</td>
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<td>Mrs Joanna KORHONEN</td>
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