

## **EUA's response to the 2017 Consultation on the EU's Framework of Key Competences for Lifelong Learning**

1. EUA welcomes the EC's consultation on the Framework of Key Competences for Lifelong Learning. The consultation provides an opportunity for taking stock of the practical experience achieved with the framework so far, and also for considering the changes that it may require, due to "political, social, economic, ecological and technological developments since 2006, such as migration, globalisation, digital communication, the increased importance of STEM skills and social networks, and sustainable development issues."  
An update is particularly relevant due to growing political radicalisation, attacks against freedom of speech, beliefs and political and cultural expression, changes in the communication and information technologies and cultures, including fast and massively increased data and information flows, and social media use.
2. EUA also welcomes the revision of the key competences framework as an important opportunity to revisit the concept of lifelong learning, which needs to evolve, given the changes in economy and society, and in technological progress (digitalisation). While the EU has been vocal and successful in advocating LLL as a priority for European society and its education sectors, recent policy initiatives have focused on skills and skills recognition, but without necessarily linking them to a broader concept of LLL. Unlike skills provision, lifelong learning is a conceptual approach, which is widely embraced and cherished by the European education sectors. Evidence shows that over the past years, European higher education institutions have been responding to the [European Universities' Charter on Lifelong Learning](#) (2008), and have developed strategies for LLL.
3. For higher education, it is important to be aware that, in most cases, institutions do not prepare graduates only for specific careers with a specific set of skills, but for a large diversity of career paths, and enable them to broadly contribute to society. Thus EUA, while understanding the importance of accelerating economic growth and improving skills, cautions against subordinating higher education with its multiple missions exclusively to labour market needs. Concerning "skills requirements", such as active citizenship skills, a critical mind-set, openness, tolerance and engagement are at the heart of academic education, and should not be seen as an 'add on' to the curriculum. EUA, in line with Council of Europe, has argued continuously that higher education institutions provide a comprehensive education, which would serve not only employment, but personal development, active citizenship and the advancement of knowledge.
4. EUA would like to stress the importance of academic freedom and institutional autonomy as overarching principles of the higher education sector. Any move to align higher education more closely with primary, secondary and adult sectors would have to respect these principles.
5. EUA would like to recall that in contrast to the learning outcome, there has never been a clear definition of "competence". However, consensus is emerging in support of the position taken by the European Qualifications Framework, according to which competence means the proven ability to use knowledge, skills and personal, social and/or methodological abilities, in work or study situations and in professional and personal development. As the EQF itself is currently under review, it would be of key importance that the two review processes would be aligned.
6. The importance of the Key Competences Framework for higher education would be regarding transversal competences and on the relationship between specific competences. In some disciplines, higher education actively engages in discussions about key competences with professional bodies and other stakeholders. However, for higher education at large, and across its many disciplines, learning outcomes rather than competences remain the common denominator, also in terms of the practicalities of curriculum design, and assessment.
7. From the perspective of higher education, the eight competences of 2006 framework are still valid, but would require some changes and additions:

Competences	Suggestion
1+ 2	Language competence should not, or not only, be regarded in a dichotomy of mother tongue and foreign language. A considerable number of European citizens grow up with more than one native

	language, and live in an environment where there are other languages, which cannot be described as foreign. While this form of language diversity is often neglected in formal education, it may provide an additional approach to promote multilingualism and raise awareness for cultural diversity.
Literacy	Given the developments in the media and communications sector, the key competences should emphasise literacy beyond actual reading and writing skills, e.g. as the competence to assess written and visual media and data in a critical and differentiated manner, and being able to take responsible actions in professional and personal contexts. This is important with regards to employment, but also as a civic competence, and for an important ability for continued learning.
Competences deriving from political, social, and economics education	The 2006 framework highlights “mathematical competence and basic competences in science and technology”. EUA would propose to allocate equal importance to skills and competences in the fields of social sciences and humanities from an early age on, as these support the ability to analyse and navigate complex and globally interrelated developments and processes. They relate also to entrepreneurial and civic competences, cultural awareness, including the ability to situate science and technology developments in different social, cultural, historic and economic contexts.
5	“Learning to Learn” should make a reference to “research and other curiosity driven learning approaches”, as these are essential for the ability to become an autonomous learner.
6+7	“Sense of initiative and entrepreneurship” should either go under “Social and civic competences”, or reorganised at “civic competences” and “social and entrepreneurship competences”.
8	The competence on “Cultural awareness and expression” should include an explicit reference to openness and need to also learn about “cultural expressions” that are not rooted in the “local, national and European cultural heritage”. This is of crucial importance with regards to understanding culture in increasingly globalised world, but also with regards to a better understanding of cultural expressions of migrants and diaspora groups in Europe.

8. EUA would like to point to the considerable number of skills projects in areas deemed relevant to the economic, political and social needs launched since 2006, by the EC and other European actors (as listed below). Given so much investment and collaborative activity, it would be expected that their results are considered for the current revision of the key competences framework for LLL, in order to enhance the quality and versatility.
- DG SANCO’s work in consumer education, notably the [DOLCETA](#) project.
  - DG MARKT’s European Database of Financial Education (EDFE). An [expert group](#) was convened and a [report](#) commissioned, but the website was taken down in 2011.
  - DG ENTR’s work on enterprise education, in which EUA participated, and which yielded a report on *Entrepreneurship in Higher Education, especially in non-business studies*, in 2008. This work continues under the aegis of DG EMPL, which last year sponsored the JRC report on the [Entrepreneurship Competence Framework](#) known as EntreComp.
  - DG EMPL and the JRC are also leading on the Digital Competence Framework for Citizens (DigComp). The JRC’s [DigCom 2.0 report](#) builds on the work which began with the appearance of digital competence in the 2006 Recommendation.
  - The Joint Research Centre (JRC), which makes part of the EC, has undertaken substantial work on entrepreneurship and digitalisation, and published recently [frameworks on entrepreneurship competences](#) and [digital competences](#).
  - The Council of Europe has reacted to the migration crisis with [Competences for Democratic Culture: living together as equals in culturally diverse democratic societies](#) (2016), and is currently developing guidelines.
9. EUA would like to recall that since the 2006 Recommendation, three countries have acceded to the EU. From its longstanding and extensive dialogue and cooperation with members and partners from outside the EU, EUA believes that the issue of key competences is relevant to the entire European Higher Education Area, the European Neighbourhood region, as well as to other Third Countries. Therefore, the Key Competences Framework should be considered in the EU’s international dialogue and cooperation on education.