

6 December 2005

UNICE POSITION ON THE COMMISSION CONSULTATION ON A EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING

EXECUTIVE SUMMARY

UNICE generally recognises that the European Qualifications Framework (EQF) can be a useful European voluntary tool. The Commission's consultation document provides a constructive basis for its development, but certain elements of the framework need to be further worked upon and clarified.

UNICE welcomes the fact that the EQF encompasses both higher education and vocational education and training (VET) in a lifelong learning perspective. It is also crucial for employers that the proposed reference levels are expressed in terms of knowledge, skills and competences, thereby allowing the various reference levels to be reached by individuals via different learning pathways (formal, non-formal and informal). This can increase transparency of competences acquired by individuals, ease national and cross-border staff mobility and hence contribute to a better matching of supply and demand on European labour markets.

The main added value of the EQF for employers would be to foster development of National Qualification Frameworks (NQFs) in each country and, in countries where NQFs exist, to open up NQFs to non-formal and informal learning pathways. However, European employers doubt that the EQF as it is designed in the consultation paper will have much direct added value for companies. Indeed, it is far too complex to serve as a tool to help recruitment managers in enterprises, even in large companies wishing to hire foreign staff.

European employers make concrete proposals in the following position paper on how the proposed EQF should be further simplified, clarified and tested in close correlation with labour market and companies' needs.

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Introduction

1. In its consultation document the European Commission proposes the establishment of a European Qualification Framework (EQF), whose main features are as follows:
 - The aim is to have a common EU method enabling everybody to “read” different qualifications and to relate one qualification framework (national/sectoral) to others.
 - The core element of the EQF is the establishment of eight common reference levels. Each description of a given level is divided into “a core” dealing with learning outcomes (knowledge/skills and wider aspects of competences) and “a supporting part” providing information on input-variables (the learning situation in which the knowledge, skills and competences have been acquired). In principle, this includes informal and non-formal competences that are acquired at the workplace.
 - In addition to the common reference levels, a number of principles and tools are described, which are or should be developed in the future, in order for the EQF to function properly.
2. National Qualification Frameworks (NQFs) each have a different number of reference levels. It is for national qualification authorities to examine how the NQFs can fit into the EQF, i.e. how to assign qualifications to the EQF levels. The EQF is supposed to encompass both higher education and VET. For optimal functioning of the EQF, each country should have a single National Qualifications Framework, which is currently not the case.

UNICE comments on the Consultation Paper Questions

On the rationale of an EQF

3. Companies increasingly need highly qualified workers. Because of demographic developments, the ageing of working population and the fact that the baby-boomer generation will soon retire, fewer newly qualified young people are entering the labour market. It is therefore crucial both to ensure high-level education for young people which matches labour market needs and to give the opportunity to people already on the labour market to update their skills and develop lifelong learning

pathways towards higher level qualifications. The EQF should be tailored to contribute to a better matching of supply and demand on European labour markets.

4. UNICE broadly welcomes the EQF initiative whose main aims are to foster transparency of qualifications, to enhance the transferability and ease the validation of competences across Europe. An EQF may indeed promote transparency and readability of qualifications delivered by the different countries and may contribute to increased mobility of workers and students within and across borders. Easing the mobility of workers contributes to addressing the labour market supply needs of companies.
5. However, the main added value of the EQF for employers would be to foster development of NQFs in each country and, in countries where NQFs exist, to open up NQFs to non-formal and informal learning pathways. Indeed, education and training systems must be steered towards reduced complexity and increased coherence in the provision of education and award of qualifications. Furthermore, establishing NQFs expressed in terms of competences will ease access and enable progression towards higher level qualifications irrespective of the way competences are acquired (formal, non-formal and informal). All in all, the establishment of NQFs is important for employers because it can enable the implementation of fully-fledged lifelong learning strategies in each country in order for education and training provision to better adapt to labour market needs. To reach this goal, the management of NQFs should not be restricted to formal education authorities.
6. European employers doubt that the EQF as it is designed in the consultation paper can be a practical tool to help recruitment managers in enterprises, even in large companies wishing to hire foreign staff. The European Curriculum Vitae is more likely to be useful in that context. However, the fact that the EQF requires qualifications to be described in terms of knowledge skills and competences, i.e. that it takes account of the way companies assess workers competences, is useful to boost the implementation of lifelong learning strategies in each country. UNICE therefore supports the development of a voluntary and outcome-oriented system.

On the reference levels and descriptors

7. European employers welcome the fact that the proposed reference levels are common to higher education and VET. In their view, it is also crucial that the various reference levels can be reached via different learning pathways (formal, non-formal and informal). They believe that this will increase the transparency of qualifications, provided the descriptors of common reference levels are based on the knowledge, skills and competences acquired by individuals.

8. Design of the EQF: The proposed reference levels do capture the complexity of lifelong learning in Europe, but by the same token they replicate it. The proposed structure should be amended to reflect the following concerns:
 - reference levels should allow reflecting the career progression of workers even at the highest level;
 - one should ensure that the proposed structure does capture situations where people are, for example, on level 1 concerning “knowledge” but on level 6 for “wider skills and competences” because this corresponds to real-life situations;
 - the tables describing the different reference levels should remain as simple as possible and using vocabulary which is easy to understand. The difference between levels should be easier to make. Using some of the language in the Dublin descriptors for higher education would be more favourable for employers and for the promotion of entrepreneurship.

9. Link with Bologna process: The Commission proposal for an EQF should be consistent with the higher education EQF adopted in the Bergen ministerial conference in May 2005. Avoiding duplication of initiatives is necessary to prevent confusion in the implementation phase.

10. Clarity of Presentation: The fact that the common reference levels, which are the main innovative and important part of the EQF, are presented in combination with a series of other principles and tools makes the overall EQF proposal difficult to understand. These principles and tools should be clearly separated from the main proposal on the reference levels. Moreover, in the main proposal, using multiple references (there are currently three tables that have a different *raison d'être*) could have the effect of being confusing.

On National Qualifications Frameworks

11. Debates on NQF: As already explained earlier, a positive aspect of the EQF is that its development may foster debates on the establishment of NQFs, which can help to increase coherence and transparency of qualifications within one country, despite increasing regionalisation, decentralisation or even individualisation of learning provision to ensure responsiveness to labour market needs. This could also be a means to improve permeability between VET and higher education and also greater dialogue between the world of education and the world of work.

12. Some Member States already operate with established systems of validation of non-formal and informal learning outcomes encompassed in qualifications frameworks. As the current format of the EQF has been conceived with such ‘models’ in mind, this could hypothetically facilitate the alignment process if the EQF achieves the level of credibility it aspires to.

On sectoral qualifications

13. In recent years especially, there have been very important developments at sectoral level in terms of identification of skills needs, validation of competences or learning provision and, in some cases, the establishment of sectoral qualifications.
14. In the consultation paper, the Commission states that one of the aims of the EQF is “to provide a voluntary framework for sector and branch level organisations/associations enabling them to identify interconnections, synergies and possible overlaps between offers at sectoral and national level”.
15. It is not clear how the EQF could foster an alignment of sectoral initiatives. In reality, national qualification authorities remain the only competent bodies to “award” formal qualifications, be they initially developed or designed at European or international sectoral level. The EQF can certainly be useful as an interesting reference paper from which sectors can draw inspiration, but this is not the main role of the EQF.

On mutual trust

16. To ensure, in the long term that alignment between national systems is effective, it must be ensured that an EQF is brought closer to local realities. The EQF should therefore be subject to a trial period involving several national systems where in at least one case a national qualifications framework does not currently exist. It would also be beneficial to apply this to different sectors both within and across Member States. UNICE therefore supports the idea of pilot projects. The current timescale of implementation should be extended. The EQF proposals should be tested in close correlation with labour market and companies’ needs.
17. A further way to bring life into the EQF would be to have a complementary ECVET system. UNICE regrets that the two consultation processes were separated and wishes that the two European initiatives are tested in parallel as they mutually reinforce each other.
18. The development of mutual trust through the EQF partly depends on the scope of implementation, which is likely to have an indirect impact on its overall credibility and consistency. For the EQF to become a reference to improve the quality of all levels of lifelong learning, it needs to receive widespread support from all stakeholders. As such, it should be simplified in terms of structure and marketed in a more accessible manner to better demonstrate its intended added value. Experiences in Member States where NQFs are currently being implemented (e.g. Ireland; Hungary) should be used to steer the marketing and promotion of the EQF, notably vis-à-vis employers.
19. The principles and tools presented within the EQF should be as far as possible common to higher education and VET. For example, the principles developed on quality assurance within both cooperation processes should be merged. This would also foster mutual trust.

20. UNICE finally underlines that the voluntary implementation of the EQF is key. The EQF proposal cannot be understood as having a compulsory impact on qualifications and classification structures in Member States.

Conclusion

21. UNICE broadly agrees that the EQF could be a useful voluntary tool to foster transparency of qualifications, to enhance the transferability and ease the validation of competences across Europe. It can ease national and cross-border staff mobility and hence contribute to a better matching of supply and demand on European labour markets. However, UNICE doubts that the EQF as it is designed in the consultation paper can be a useful practical tool for companies. The main added value of the EQF for employers would be to foster development of NQFs in each country and, in countries where NQFs exist, to open-up NQFs to non-formal and informal learning pathways.
22. The EQF should encompass both higher education and VET and reference levels should be based on knowledge, skills and wider competences. This could have a positive impact on the implementation of lifelong learning in Member States and for addressing labour market needs.
23. To bring the EQF closer to local and business reality, a test phase should be undertaken and the current timescale of implementation should be extended. Such a trial period should also test a possible complementary ECVET system to give practical insight into how the two instruments can work jointly.
