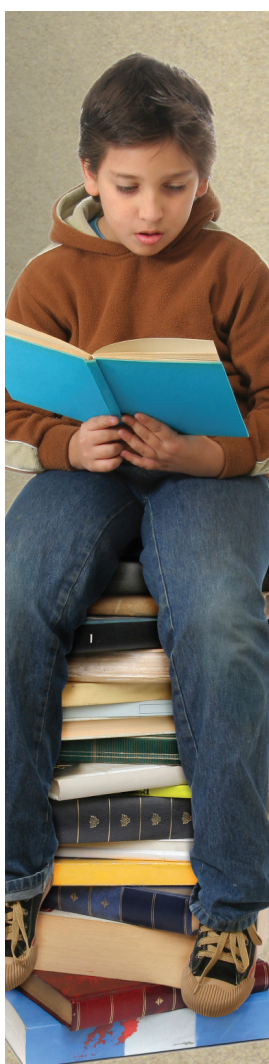**DIRECTORATE-GENERAL FOR INTERNAL POLICIES**

POLICY DEPARTMENT B
STRUCTURAL AND COHESION POLICIES

Agriculture and Rural Development

Culture and Education

Fisheries

Regional Development

Transport and Tourism

State of play of the European Qualifications Framework implementation

STUDY

State of play of the European Qualifications Framework implementation

STUDY

Abstract

The EQF is an instrument aimed at promoting workers' and learners' mobility and lifelong learning through referencing national qualifications systems. Analysing the relevance, implementation and first outcomes, one can conclude that although the implementation of the EQF could be assessed as successful, some important issues can be identified, that form a serious test to the full and trustworthy implementation of the EQF. Nevertheless, there is a call for continuation of the EQF implementation provided that the right conditions have been met.

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LIST OF ABBREVIATIONS

AT	Austria
BE	Belgium
BE-F	Belgium Walloon community
BE-VL	Belgium Flemish community
BG	Bulgaria
BIBB	Bundesinstituts für Berufsbildung (Federal Institute for Vocational Education and Training)
CEDEFOP	European Centre for the Development of Vocational Training
CEEP	European Centre of Employers and Enterprises Providing Public services
CY	Cyprus
CZ	Czech Republic
DE	Germany
DG EAC	Directorate General Education and Culture
DG EMPL	Directorate General Employment, Social Affairs & Inclusion
DG MARKT	Directorate General Internal Market and Services
DK	Denmark
DQR	Deutscher Qualifikationsrahmen (German Qualifications Framework
ECTS	European Credit and Transfer System
ECVET	European Credit system for Vocational Education and Training
EE	Estonia
EL	Greece
ENIC-NARIC	European Network of Information Centres - National Academic (& Professional) Recognition and Information Centre.
EP	European Parliament
EQAVET	European Quality Assurance in Vocational Education and Training
EQF	European Qualifications Framework
EQF AG	EQF Advisory Group
EQF-REF	EQF Referencing Process
ES	Spain
ESCO	European Skills, Competencies and Occupations taxonomy
ESG	European Standards and Guidelines

ETF	European Training Foundation
ETUC	European Trade Union Congress
EU	European Union
EUA	European University Association
EUCIS-LLL	European Civil Society Platform on Lifelong Learning
FI	Finland
FR	France
HE	Higher Education
HQR	Qualifikationsrahmen für Deutsche Hochschulabschlüsse (German Higher Education Qualifications Framework)
HR	Croatia
HU	Hungary
IE	Ireland
ILO	International Labour Organization
IS	Iceland
ISFOL	Istituto per lo Sviluppo della Formazione Professionale dei Lavoratori (Italian Institute for the Development of Vocational Training for Workers)
IT	Italy
KMK	Kultusministerkonferenz (The Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany)
KSC	Knowledge, Skills and Competences
LI	Liechtenstein
LLP	Lifelong Learning Programme
LRC	Lisbon Recognition Convention
LT	Lithuania
LU	Luxembourg
LV	Latvia
MS	Member State
MT	Malta
NCP	National Coordination Point
NL	Netherlands
NLQF	Nederlands kwalificatiekader (Dutch Qualifications Framework)
NO	Norway

NQF	National Qualifications Framework
OEAD	Österreichischer Austauschdienst (Austrian agency for international mobility and cooperation in education, science and research)
OMC	Open Method of Coordination
PES	Public Employment Services
PIAAC	Programme for the International Assessment for Adult Competencies
PISA	Programme for International Student Assessment
PL	Poland
PLA	Peer Learning Activity
PLOTEUS	Portal on Learning Opportunities throughout the European Space
PQF	Krajowych Ram Kwalifikacji (Polish Qualifications Framework)
PT	Portugal
QF	Qualifications Frameworks
QF EHEA	Qualifications Framework European Higher Education Area
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia
TK	Turkey
UEAPME	European Association of Craft, Small and Medium-sized Enterprises
UK	United Kingdom
UK (SCOT)	United Kingdom, Scotland
VET	Vocational Education and Training
YH	Myndigheten för yrkeshögskolan (Swedish National Agency for Higher Vocational Education)

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EXECUTIVE SUMMARY

The European Qualifications Framework (EQF) for lifelong learning is an instrument, established within the context of the European cooperation in the field of Education and Training, aimed at promoting workers' and learners' mobility and lifelong learning. The summary will provide a concise presentation of the outcomes of this study, assessing the relevance, the implementation and the outcomes of the EQF. Finally, we conclude by presenting the conclusions and recommendations.

Relevance of the EQF for lifelong learning

The EQF aims to relate different countries' national qualifications systems to a common European reference framework of eight levels. In the Recommendation of the European Parliament and of the Council of 23 April 2008, on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), Member States (MS) are invited to:

- relate their national qualifications systems to the European Qualifications Framework by 2010;

- indicate the EQF level at each new qualification by 2012;

- use an approach based on learning outcomes when defining and describing qualifications, and promote the validation of non-formal and informal learning;

- promote and apply the principles of quality assurance in education and training;

- designate a national coordination point.

The need to foster lifelong learning as a basic component of the European social model and to facilitate workers' and learners' mobility by increased transparency of qualifications systems is deemed a necessity given demographic change, rapid social, technological and economic change and the ongoing globalisation and mobility of workers between European and third countries. Through the EQF, qualifications and education systems become more comparable and transparent, finally promoting workers' and learners' mobility between countries, mobility between education systems and increased opportunities for lifelong learning.

The development of the EQF and the implementation of the recommendation has been widely promoted at European level, it is closely related to European education agenda's (especially for VET and HE) and it respects the principle of subsidiarity. Also, there is clearly momentum, world-wide, for establishing qualifications frameworks.

There are different types of qualifications frameworks (communication, reform and transformational frameworks). The EQF, as a transnational QF, is regarded as a communication framework (a translation device). The NQFs which are designed, developed and implemented in the MS represent all three types of frameworks.

From a theoretical viewpoint, the intervention logic of the EQF appears to be solid. The EQF presented clear objectives (promoting workers' and learners' mobility and lifelong learning) and qualifications frameworks appear to be a highly relevant tool for pursuing these objectives through providing more transparency and comparability between qualifications systems. However, despite being aimed at the labour market, the EQF in its design is mainly related to education policy, and less to the world of work.

The EQF is, in its general objective and structure, closely related to other European education initiatives and tools (such as ECVET (European Credit system for Vocational Education and Training), Europass, EQAVET (European Quality Assurance in Vocational

Education and Training), ESG (European Standards and Guidelines), QF EHEA (Qualifications Framework European Higher Education Area), validation of non-formal and informal learning) and in theory these initiatives are mutually supportive. However, it is too early to fully identify the effects of these initiatives and their impact on the functioning of the EQF, since these are at an early stage of development. Also, the EQF is related to initiatives governed by other Directorates General (DG), such as the European Skills, Competencies and Occupations (ESCO) taxonomy (DG EMPL and DG EAC, and the Professional Qualifications Directive 2005/36 on the recognition of professional qualifications (DG MARKT). With regard to the latter, some clear differences can be identified since the EQF is an outcome based system of eight levels, while the Directive includes a five level system based on input variables. Alignment between the two systems is therefore recommended.

Implementation of the EQF for lifelong learning

In the Recommendation on the EQF the MS voluntarily agreed amongst other things to work on referencing their qualifications to the EQF levels. The European Commission can, under the subsidiarity principle, only play a facilitating role. In order to encourage MS to follow up on the recommendation, several instruments are available under the Open Method of Coordination. The open method of coordination is 'designed to help MS to progressively develop their policies'. From previous research on the Open Method of Coordination (OMC) in other policy fields, conditions can be distilled that are crucial for a **successful implementation of the OMC**, namely: 1) preparatory political involvement; 2) common concern; 3) high level of institutionalisation; 4) availability of specific objectives, benchmarks and indicators; 5) involvement and cooperation of stakeholders, and 6) presence of conflict between MS with incentive or reluctance to act. The key findings are structured along these conditions (findings are described both at EU and MS level).

1) Preparatory political involvement

Steps are often taken in the past that have led to an increased awareness of, or involvement in a topic. A certain foundation needs to be existent in order to continue developing a policy field. This certainly applies to the EU level where many MS need to be familiar with the topic, but also on the MS level itself where the policy field needs to have had a certain history.

At EU level:

- The EQF has known a long development period before it was actually formalised with a Treaty-based Recommendation.

- The commitment amongst EU level stakeholders is strong.

- The Recommendation on the EQF is based on extensive studies and consultations.

At MS level:

- There are major differences between MS in their starting positions. Some MS already had frameworks in place, or had experience with the learning outcome approach, others did not.

- Most MS have been involved in the EQF project long before the 2008 Recommendation, but it remains questionable whether all relevant stakeholders, such as employers, employees and the educational sector, at MS level have been involved to such an extent that mutual ownership is being created.

- In most countries, studies (e.g. consultations, technical studies, mapping exercises, pilot studies) have been conducted to provide a solid grounding of an NQF and the referencing to the EQF.

2) Common concern

There should be a common concern among MS that it is important to develop a certain policy field. There should be a European discourse on the topic in order to gain similar understanding of the definitions, the instruments available and an agreement to reach a certain quality level. As a result, a feeling of shared responsibility should be created which is the main drive behind the policy developments made and which also serves as a motivation for improvement of national policies.

At EU level:

- The EQF is built upon a common concern amongst MS and EU level stakeholders.

- This common concern is further supported by notes and guidelines to support MS in implementing the 2008 Recommendation. The process can be characterised by 'learning by doing', so therefore the knowledge-base evolved during the process. This evolution is captured by notes drawn up by Cedefop and the European Commission to guide MS in the process.

At MS level:

- Although the terminology used within the EQF Recommendation is not always consistent with other European initiatives (e.g. the concept of 'competence' differs), the language is clear enough for MS to relate to their own initiatives.

- Concerning the referencing process, some difficulties are encountered by MS. The most important difficulties relate to justifying the link between level descriptors of the national system/framework and the EQF and applying the learning outcome approach. Other difficulties relate to positioning certain qualifications (e.g. school leaving certificate), establishing procedures for validation of non-formal and informal learning and applying quality assurance systems attuned to the learning outcome approach.

- It remains difficult to see how the common concern develops at 'ground level' (i.e. education providers, workers, employers and citizens). In order to make sure that the EQF has relevance to the world of work and education at national level, this common concern at ground level needs to be further developed.

3) Institutionalisation

A high level of institutionalisation means that an organisational structure exists where people continuously work on the coordination and improvement of a specific sector. Someone has to take on the role of coordinator in order to coordinate a large scale cooperation process such as the OMC.

At EU level:

- The OMC for the implementation of EQF is Treaty based by means of the 2008 Recommendation.

- For the period after April 2013, a new mandate is required to continue working on the implementation of the EQF at EU level.

- Roles and responsibilities at EU level are clearly defined between the EQF Advisory Group (EQF AG), European Commission, Cedefop, Council of Europe, European Training Foundation (ETF), MS and other stakeholders (e.g. social partners).

- The human resources within the European Commission to coordinate the work appear to be rather limited; however, there is no indication that this is hampering their facilitating role, which seems to work very well.

At MS level:

- The division of roles and responsibilities at MS level depends on the **intensity of the** approach taken to the implementation of the EQF and there is a tendency that existing role divisions between groups of stakeholders are continued, although slight changes in structures, involving other stakeholders, are sometimes recommendable.

- In most countries the implementation of the Recommendation on the EQF is in the hands of the Ministry of Education (or alike). Some countries deliberately choose to position the coordination of the development of an NQF outside the Ministry of Education, to position the qualifications framework closer to the labour market and to develop mutual ownership of the framework. This seems to have positive outcomes on the labour market orientation of the framework.

4) Availability of specific objectives, benchmarks and indicators

When clear objectives, benchmarks and indicators are lacking, it is often difficult to stimulate concrete actions and to measure results. A successful OMC therefore, includes specific objectives, benchmarks and indicators.

At EU level:

- Objectives have been set at EU level and appropriate monitoring systems have been put into place (e.g. EQF AG, facilitated by the European Commission and Cedefop).

- Although clear EU targets are established within the framework of EU2020 and ET2020, there is no explicit link between the EQF and these targets, concerning the manner in which the EQF will contribute to reaching these targets (e.g. on labour and learning mobility and participation in lifelong learning). It should be clearly monitored how the EQF contributes to these targets.

At MS level:

- The objectives of the Recommendation are clearly set and deadlines are specified.

- With regard to the first deadline (referencing national systems to EQF levels), most countries will not finalise their referencing report within the given deadline. Nevertheless, the delay will not be problematic, since all participating countries will finalise their referencing reports within approximately two years.

- More problematic is the progress in relation to the second deadline, including a reference to the appropriate EQF level at each new qualification and Europass document. Many countries have not even started working on procedures to guarantee that this will happen, even those that already finalised their referencing report. This is a concern, since this second step enforces the EQF to touch the ground in MS.

5) Involvement and cooperation of stakeholders

The involvement and cooperation of stakeholders is of crucial importance for the success of the OMC, as the method is theoretically supposed to work bottom-up. Guidance and coordination at the community level will only be effective and sustainable, if the programme is supported by the MS their civil society and actively implemented at the local level.

At EU level:

- Different groups of stakeholders have been involved from the start and are still involved as members of the EQF AG.

- A closer involvement of other DGs having a natural stake in the implementation of the EQF (i.e. DG EMPL and DG MARKT) could be further stimulated to increase the labour market orientation of the EQF.

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At MS level:

- A distinction can be made between two groups of stakeholders, namely the educational sector and labour market related stakeholders.

- In general the first group (educational sector) is more profoundly engaged than the second group (labour market related stakeholders).

- It appears difficult to have the labour market side involved, also due to a lack of interest from the employers' side, who in some countries regard the EQF/NQF as not being relevant for them. This creates a serious threat to the pursued mutual ownership of NQFs and to the role these frameworks are envisaged to play in relation to the labour market.

6) Presence of conflict between MS with incentive or reluctance to act

Because of a conflict of opinions, the MS with an incentive to act will try to persuade the reluctant MS to join them in developing a particular policy field. If there is no conflict, no debate will follow and few actions will be initiated. The same applies to the national level, where the more reluctant parties will have to be convinced of the importance of a potential national priority. In order to get a topic on the national agenda someone needs to be absolutely convinced of its importance and lobby for more support.

At EU level:

- The implementation at EU level can only be successful where the implementation at MS level is trustworthy.

- The involved countries are at different stages in their development of NQFs and EQF referencing reports. They feel the need to provide critical feedback, to support other MS and to stimulate each other while implementing the recommendation. Evidence was found that MS have adjusted their referencing reports, as a result of pressure from other MS.

- Until now, no deep conflicts have occurred, but potential hazards endanger the implementation (e.g. positioning the school leaving certificate either at level 4 or 5, but also the progress made against the second deadline). The future should tell how the OMC will react to these potential conflicts and whether it proves resilient.

- The European Commission and Cedefop, play an important facilitating role avoiding potential conflicts between MS, starting up discussions with MS well in advance and use strategically Peer Learning Activities to discuss potential conflicts at an early stage.

At MS level:

- In general it can be concluded that in countries where the EQF is being used as a reform agenda, conflicts between different stakeholders (e.g. between educational sectors, between the education sector and employers) are more pressing than in countries where the EQF is implemented more technically, since it is not influencing established systems or frameworks in place.

- In some countries the prior technical implementation leads to debates and conflicts calling for more severe transformations of education systems on the long run.

Outcomes of the EQF for lifelong learning

In literature on qualifications frameworks, critical assessments can be found on the impact of qualifications frameworks. As a result some authors claim that the evidence base for the implementation of qualifications frameworks is lacking. Others mention that the shift to learning outcomes might destabilise existing education structures and distract attention to more pressing national educational issues (such as early school leaving). Although, these accounts are valued as counterpoint for 'sheer policy-believing', the hard evidence that

qualifications frameworks will not lead to impact is as questionable as the hard evidence that qualifications frameworks will lead to impact. For providing a clear and reasonable view on the outcomes one first needs to define the impact categories qualifications frameworks are aiming at. Secondly, one should be realistic on what can reasonably be measured and concluded given the time span of the implementation. To gain a balanced judgement of outcomes of the implementation of the EQF recommendation, a distinction should be made between three categories of outcome: output, results and impact.

- It can be concluded that the **output** of the whole EQF project until now is satisfactory for most stakeholders involved and is progressing according to plan. The 2008 Recommendation and the preparatory work triggered a lot of activities in the MS and at European level which are clearly related to the final objectives of the Recommendation. A serious flaw is that it is questionable whether the second step in referencing will be finalised.

- The **results** of the EQF project, defined as increasing transparency and stakeholder involvement, almost four years after the publication of the Recommendation are promising, but at this point insufficient for realising the final objectives improving workers' and learners' mobility and increasing lifelong learning. Fields on which insufficient progress has been made concern the implementation of the learning outcome approach, stakeholder involvement, establishment of quality assurance systems, and the further establishment of validation procedures for non-formal and informal learning, at national level.

- The **impact** on the main objectives of the EQF, namely increased lifelong learning and workers' and learners' mobility, cannot be made sufficiently visible at this moment. In the first place, it is still (almost 4 years after the Recommendation) relatively early to see the impact and only anecdotic evidence exists, such as countries where qualifications frameworks facilitate validation of prior learning and making national systems comparable. Secondly, due to lack of progress in relation to the envisaged results, it remains questionable whether full impact will be reached in short term.

Conclusions

Implementing the EQF Recommendation is a prestigious, comprehensive and challenging EU wide project, requiring a lot of commitment of stakeholders at EU and national level. Analysing the relevance, implementation and first outcomes of this project, one can conclude that the implementation of the EQF recommendation can be considered to be an example of a successful OMC.

Nevertheless, **the following critical conclusions** can be drawn mentioning some serious challenges and technical issues that could be a threat to the full and trustworthy implementation of the EQF Recommendation.

- There is **no explicit link between the EQF and the EU targets** that are established within the framework of EU2020 and ET2020. It needs to be better explained how the EQF will contribute to reaching these targets (e.g. on participation in lifelong learning).

- There is a lack of **involvement of other DGs** which should have a natural stake in the implementation of the EQF (i.e. DG EMPL and DG MARKT). This could be further developed to increase the labour market orientation of the EQF.

- Differences existed between MS with regard to the point of departure. Some of the MS already had long-established frameworks, while others still had to discuss and implement the basic principles. This **difference in the initial stages influenced progress made with regard to the implementation** of the Recommendation on the EQF and to set up NQFs.

- There is clearly a **discrepancy** between the five level system based on input variables of the **Professional qualifications Directive 2005/36** on the recognition of professional qualifications and the **EQF** outcome based system of eight levels. Alignment between the two systems is recommended.

- Difficulties are encountered by some MS in the **referencing process (first deadline on referencing national systems to EQF levels)**. These difficulties mainly relate to:

  o Justifying the link between level descriptors of the national system/framework and the EQF.

  o Limited progress in applying the learning outcomes approach.

  o Positioning certain qualifications within NQF and subsequently referencing them to the EQF (a striking example is the discussion on how to place school leaving certificate giving access to higher education).

  o There is a lack of established validation procedures for non-formal and informal learning.

  o Disputes between VET and HE sector, hampering permeability and the reduction of the traditional barriers between the two subsystems

  o The way the provision of learning outside the formal sector (non-formal and in formal learning) is included and linked to the national frameworks.

  o Insufficient attention to underpin qualifications frameworks and systems with transparent procedures for assuring the quality attuned to the learning outcome approach.

- It appears difficult **to engage stakeholders** outside the formal education sector and, more specifically, final beneficiaries (social partners and citizens). A major challenge is to have the **labour market side involved**, since there is a lack of interest from the employers' side who in some countries regard the EQF/NQF as not relevant for them. This creates a serious threat to the dialogue between education and labour market side, the pursued mutual ownership of NQFs and to the role these frameworks are envisaged to play in relation to the labour market.

- Many countries, including those that finalised their referencing report, have not even started working on procedures to guarantee that a reference to the appropriate EQF level will be included on each new qualification and Europass document (**second deadline**).

- The **Referencing of international qualifications** is in a way a test case on how comparable NQFs are. The key question is whether qualifications, without coordinated actions, would be positioned at the same EQF levels by all countries.

As a consequence of all of the above mentioned issues, the full and trustworthy implementation of the EQF could be endangered by a lack of **mutual trust**. The difference in how countries deal with the implementation could harm the trust of MS in the EQF implementation in other countries than their own. To increase the mutual trust, it is of the highest priority to have all stakeholders involved in the implementation. This can only fully be done by implementing the **second step in the referencing process**: indicating the level of the EQF on each new qualification. The momentum for developing qualifications frameworks is there, but will soon be lost when the discussions only involve high level policy makers and well informed stakeholders and not the broader public. Therefore, completing the second step of referencing, initiating ground-level practical debates on the function and functioning of the EQF should be the primary objective in the coming year

towards April 2013. It is by this second step that it will be possible for the EQF to start to make an impact, since only then it will be seen, used and discussed by the end-users, creating a 'flywheel' effect and boosting the results and impact of the EQF.

Recommendations

The following recommendations for further action can be presented to various stakeholders.

To the European Parliament, **the European Commission and other European level institutions**:

- It is recommended to **continue the mandate** of the EQF AG after April 2013, given the relevance of the EQF implementation for the future European labour market and education system; the global tendency to develop qualifications frameworks; the efforts made at European and MS level to build mutual trust in each other's national qualifications framework or system; and finally the output already generated and preventing that the process will come to a standstill.

- It is recommended that in the new period the EQF should become less an education agenda and **more a labour market driven agenda**, including a more intense dialogue between education and labour market stakeholders. This will not happen overnight, but in the remainder of the current period, substantial progress needs to be made in relation to the second step in referencing and mitigating the main barriers.

- The evaluation, which the EC has to conduct on the period 2008-2013 will have to include both **a retrospective**, **but even more importantly a prospective view** on how the EQF can be improved in its design and implementation to better relate to the labour market side and to have a higher impact on the ground.

- It is recommended to **better clarify how the EQF contributes to the main objectives of EU2020 and ET2020** (lifelong learning and workers' and learners' mobility), by more clearly defining intermediary objective (such as implementing the learning outcome approach, developing quality systems, and developing validation procedures for non-formal and informal learning).

- It is recommended at EU level to **increase the involvement of other DGs** (DG EMPL and DG MARKT) to support the shift from an educational agenda towards a more labour market driven agenda.

- It is recommended to **further align European tools** and initiatives and in particular remove discrepancies between the five level system based on input variables of the Professional qualifications Directive 2005/36 on the recognition of professional qualifications and the EQF outcome based system of eight levels.

To the EQF AG and the Member States:

- It is recommended to **increase the focus on the second stage of referencing** (indicating the appropriate EQF level on each new qualification, certificate and Europass document).

- It is recommended to agree on **time lines** related to the second stage of referencing, draw up and distribute **guidelines** and finally **share experiences and good practices in relation to the second stage**.

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- It is recommended to **further develop and implement the learning outcome approach and appropriate validation procedures for non-formal and informal learning**.

- It is recommended to increase the focus on setting up **quality assurance systems** for all educational sectors, taking into account the learning outcome approach towards qualifications.

To Member States and stakeholders at MS level:

- It is recommended to increase **the involvement of the labour market stakeholders** to raise commitment, to create a feeling of ownership of the NQF/EQF from final beneficiaries (citizens, workers and employers) and finally, to stimulate the dialogue between education and labour market side stakeholders.

- It is recommended to **work on the second stage of referencing**: indicating the level of the EQF on each new qualification, and to initiate **ground-level practical debates** on the function and functioning of the EQF.

- It is recommended to increase **transparency how the levels are linked for final beneficiaries**, by better communicating the EQF to final beneficiaries.

- It is recommended to further build **learning outcome based quality assurance systems for all education sectors** (investigating the possibility for one QA system).

- It is recommended to further **work on validation of non formal and informal learning**, and to position learning outside the formal education sector in the NQF.

1. INTRODUCTION OF THE STUDY

1.1. Aim of the study

The European Qualifications Framework (EQF) for lifelong learning is an instrument, established within the context of the European cooperation in the field of Education and Training, aimed at promoting workers' and learners' mobility and lifelong learning. The Recommendation of the European Parliament and of the Council of 23 April 2008 (2008/C 111/01) on the establishment of the European Qualifications Framework for lifelong learning invites MS to implement the EQF and to reference their national qualifications frameworks or systems to the levels of the EQF by 2010[1]. Subsequently, by 2012, all new qualification certificates, diplomas and Europass documents should contain a reference to the appropriate EQF level.

This report provides an independent assessment of the state of play of the implementation of the EQF, contributing to the work of the EP's Committee on Culture and Education in upcoming debates on the implementation of the Education & Training 2020 and EU 2020 Strategy. Moreover, this report serves as a basis for future policy proposals for the next generation of the EU programmes for lifelong learning, whilst taking into account that both the EU budget and national budgets will face severe constraints in the next decade.

The aim of the study was to:

- examine how MS faced and are facing the challenge of implementing the EQF;
- establish a typology of measures/approaches;
- identify conditions of effectiveness
- shed some light on possible actions that could help MS achieve the expected results.

The implementation of the EQF is closely monitored by the European Commission, DG EAC, Unit A2, who is in the process of drafting its own report on the implementation[2]. In addition, both Cedefop and the ETF monitor and analyse the development of national qualifications frameworks.[3] Their material provided a good starting point for this study, but for an in-depth understanding of what happens on the ground at MS level a further analysis is needed.

1.2. Evaluative framework and research questions

When assessing the state of play of the implementation of the EQF it is not enough to examine only the progress made with regard to the **technical implementation**, assessing whether MS reach their deadlines. Although important, the progress on the technical implementation alone does not provide adequate information on whether the whole initiative will finally lead to the envisaged results and impact. Besides assessing the implementation, two additional evaluation issues need to be addressed, namely in relation to the **design** and the concrete and perceived **outcomes** of the EQF implementation. The first issue focuses on how the EQF is designed and how it fits within the European strategic agenda. The latter focuses on what are, or could be the output, results and impact of the

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[1] See Annex 1: 8 reference levels of the EQF
[2] See information provided by the European Commission. European Commission, Draft report on the implementation of the European Qualifications Framework for lifelong learning in 2008-2011, 2011.
[3] See: Cedefop, The development of national qualifications frameworks in Europe (September 2009), 2009; Cedefop, The development of national qualifications frameworks in Europe (August 2010), 2010; Cedefop,

implementation. A final issue that is addressed in this study concerns what the most important **lessons learnt** are and what could be improved. The figure below provides an overview of the different aspects of the evaluative framework.

Figure 1: The evaluative framework for assessing the state of play of the implementation of the EQF
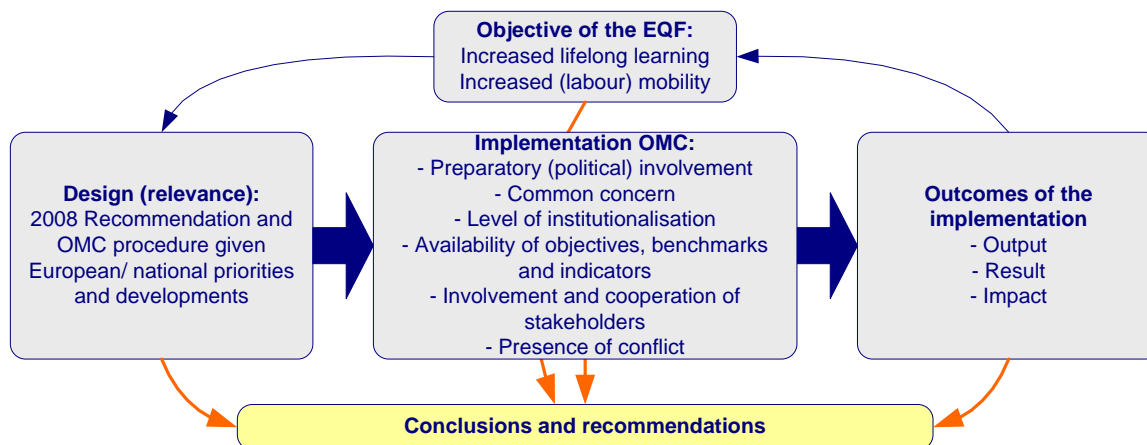
To address these evaluation issues (design, implementation, impact and lessons learnt) both at European and MS level, a number of operationalised research questions were defined, as summarised in the box below.

Box: Operationalised research questions

Operationalised research questions
EQF design (relevance)
• What problems / challenges does the EQF address? (Section 2.1 and 2.2)
• What is the EQF aiming at and what impact should it have? (Section 2.2)
• How has the EQF been designed? (Section 2.1, 2.3)
• Are the aims of the EQF Recommendation realistic and does the EQF fit within European strategic frameworks? (Section 2.2)
• How do the EU2020 strategy priorities help and support the implementation of EQF? (Section 2.2, 2.4)
• How does the EQF relate to other European tools? (Section 2.4)
Implementation
• Have studies/impact assessments been carried out to develop NQF/EQF? (Section 3.2)
• Have the instruments provided by the European Commission been sufficient for implementing the EQF? (Section 3.2, 3.3, 3.4)
• What is the current status of the implementation of the EQF in the countries? (Section 3.5)
o How far are the countries concerning the first stage in the implementation (relating the national qualifications systems to the European Qualifications Framework by 2010, either by referencing, in a transparent manner, their qualification levels to the EQF levels, or, where appropriate, by developing national qualifications frameworks)?
o How far are the countries concerning the second stage in the implementation (by 2012, all new qualification certificates, diplomas and Europass documents contain a reference to the appropriate EQF level)?

National qualifications frameworks development in Europe, 2011; ETF, Implementation arrangements for national frameworks of qualifications and the role of stakeholders and institutions, 2011.

- Is the legal basis for the implementation of the EQF sufficient to develop a transparent education area in Europe? Is further action needed? (Section 3.4, 4.3, 4.4)
- What approach has been taken to implement the EQF? (Section 2.3, 3.4, 3.5, 3.6)
    - What have been the main goals for implementing the EQF /developing an NQF?
    - If the implementation of the EQF has been used as a driver for reforms, what kinds of reforms have been, or are, taking place?
    - How have different stakeholders been involved?
    - Which educational sectors are more difficult to 'convince' of the soundness of the process?
    - On which issues were there/are there still major debates?
- Are there conflicts with other existing frameworks (e.g. QF EHEA, distinction between formal, non-formal and informal learning, Qualifications Directive 2005/36)? (Section 2.4, 3.4)

Outcomes

- Has/will the educational system become more transparent due to the implementation of the NQF/EQF? Does the implementation contribute to increased coherency among countries in their educational systems? (Section 4.1, 4.2, 4.3)
- What major changes are happening in education and training systems due to the EQF implementation? (Section 4.3)
- What have been, or are foreseen as, the most important effects on the labour market? (Section 4.4)

Lessons learnt

- What are the most important barriers in the implementation of the EQF and for additional/related reforms? In what way have obstacles been mitigated? (Section 5.1)
- What have been factors contributing to the successful implementation of the EQF? (Section 5.1)
- What can be learnt from the implementation? (Section 5.1)
- What are success and failure factors, both at EU and MS level? (Section 5.1)
- What are recommendations for future policy action? (Section 5.2)

1.3. Methodology of the study and structure of the report

1.3.1. Research activities

The following research activities have been conducted to answer the research questions:

- **Research activity 1 - Gathering data in all MS by means of desk research**: The aim of this research activity was to have a clear idea on the progress of the implementation of the EQF recommendation in the MS. Questions that were answered include: how far are the MS with implementing the recommendation? What were/are the main barriers/bottlenecks? What measures/approaches have been taken to implement the recommendation / overcome certain barriers? Will the agreed deadlines be respected, why not? In the desk research policy papers, research studies, reference reports, meeting minutes and academic papers have been studied. **Annex 2** provides a detailed overview with references.

- **Research activity 2 - Conducting in-depth country studies**: The aim of this research activity was to have an in-depth understanding of the dynamics in implementing the EQF recommendation at MS level. The focus was on how the MS deal with particular national difficulties and barriers, and what have been/are conditions for successful implementation. The selection of seven countries for in-depth analysis represents the diversity of approaches, stages of implementation and geographical variety in Europe (including the Netherlands, Germany, United Kingdom (Scotland),

Austria, Sweden, Italy and finally Poland). In each selected country at least three interviews have been conducted with relevant stakeholders and relevant literature has been studied. **Annex 2** provides a list of the sources used at country level, while **Annex 3** includes a list of the persons interviewed.

- **Research activity 3 - Interviewing European stakeholders in the implementation of EQF**: The aim of this activity was to review the progress made from a birds-eye perspective through interviewing European organizations, stakeholders and experts. The focus was more on European wide barriers, expected results and challenges, conditions for successful implementation and possible future actions. In total 13 EU-level interviews have been conducted (see also **Annex 3** including a list of interviewees). Also, members of the research team participated in a number of European conferences related to the subject[4].

- **Research activity 4 - Analysis and reporting**: On the basis of the information gathered in the previous research activities, the final report was drawn up and discussed with the European Parliament.

1.3.2. Structure of the report

The report is structured according to the four evaluation issues:

- **EQF design**: in chapter 2 the policy background is explained and conceptual issues are discussed

- **Implementation**: chapter 3 focuses on the implementation of the EQF at MS level.

- **Outcomes**: chapter 4 focuses on what have been outputs, results and impacts of the implementation.

- **Lessons learnt**: In chapter 5 conclusions are drawn up and recommendations presented.

The lists of interviewees and literature used are annexed to the report, together with the 8 levels of the EQF in **Annex 1**.

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[4] ETF conference 'Qualifications frameworks: from concepts to implementation' on 6-7 October in Brussels; Cedefop conference 'The role of the social partners in implementing European tools and principles, increasing the relevance of education and training to the labour market' on 24-25 November 2011 in Brussels; European Commission, meeting EQF advisory group on 13-14 December 2011 in Brussels.

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2.   THE RELEVANCE OF THE EQF AND ITS DESIGN

KEY FINDINGS

- The EQF aims to relate different countries' national qualifications systems to a common European reference framework of eight levels. MS are invited to relate their national qualifications systems to the European Qualifications Framework by 2010; indicate the EQF level at each new qualification by 2012; use an approach based on learning outcomes when defining and describing qualifications, and promote the validation of non-formal and informal learning; promote and apply the principles of quality assurance in education and training; and designate a national coordination point.

- The need to foster lifelong learning as a basic component of the European social model and to facilitate workers' and learners' mobility by increased transparency of qualifications systems is deemed a necessity given demographic change, rapid social, technological and economic change and the ongoing globalisation and mobility of workers between European and third countries. Through the EQF, qualifications and education systems become more comparable and transparent, finally leading to increased labour mobility between countries, mobility between education systems and increased opportunities for lifelong learning.

- The implementation of the EQF has been widely promoted at European level, it is closely related to European education agendas in VET and HE and it respects the principle of subsidiarity. Also, there is clearly momentum, world-wide, for establishing qualifications frameworks.

- There are different types of qualifications frameworks (communication, reform and transformational frameworks). The EQF, as a transnational QF, is regarded as a communication framework (a translation device). The NQFs which are designed, developed and implemented in the MS represent all three types of frameworks.

- From a theoretical viewpoint, the intervention logic of the EQF appears to be solid. The EQF presented clear objectives (promoting workers' and learners' mobility and lifelong learning) and qualifications frameworks appear to be a highly relevant tool for pursuing these objectives, through providing more transparency and comparability between qualifications systems. However, despite being aimed at the labour market, the EQF is in its design mainly related to education policy.

- The EQF is, in terms of general objective and structure, closely related to other European education initiatives and tools (such as ECVET, Europass, EQAVET, ESG, QF EHEA, validation of non-formal and informal learning) and in general these initiatives are mutually supportive. However, it is too early to fully identify the effects of these initiatives and their impact on the functioning of the EQF, since these are at an early stage of development. Also, the EQF is related to initiatives governed by other DGs, such as the European Skills, Competences and Occupations taxonomy (ESCO) (DG EMPL, DG EAC) and the Professional Qualifications Directive 2005/36 (DG MARKT). With regard to the latter, some clear differences can be identified since the EQF is an outcome based system of eight levels, while the Directive includes a five level system based on input variables.

This Chapter will introduce the principles underlying the EQF and will provide the background against which the EQF has been developed. Also, it will situate the EQF within the European context, elaborating on European challenges ahead and European strategic objectives. Furthermore, different types of qualifications frameworks are discussed and finally, links with other relevant European and international tools are presented.

2.1. The European Qualifications Framework for lifelong learning

The EQF aims to relate different countries' national qualifications systems to a common European reference framework. Individuals and employers will be able to use the EQF to better understand and compare the qualifications levels of different countries and different education and training systems. This leads to increased labour mobility between countries, mobility between education systems and increased opportunities for lifelong learning[5].

Following the conclusions from the Lisbon European Council in 2000, European policy makers have since 2003 repeatedly called for the development of an EQF to strengthen the links between frameworks at national and sectoral level and foster lifelong learning. Also, the Joint Interim report of the Council and the Commission (February 2004) on the implementation of the 'Education and Training 2010' work programme[6] indicates that priority should be given to the development of a European Qualifications Framework as an essential contribution towards the Lisbon strategy.[7] Furthermore, within different education sectors, VET and HE, the implementation of a European framework is promoted. In the Maastricht Communiqué (14 December 2004) on the future priorities of enhanced European cooperation in Vocational Education and Training (VET), the Ministers responsible for VET in 32 European countries, the European social partners and the Commission agreed to give priority to the development of an open and flexible European qualifications framework. This EQF should provide a common reference to facilitate the recognition and transferability of qualifications covering both VET and general (secondary and higher) education[8]. Within HE, efforts for establishing a European framework have been initiated even earlier, within the framework of the Bologna process. Keeping in mind the Dublin- descriptors[9], the Berlin Ministerial conference (September 2003) encouraged MS to develop an overarching framework of qualifications. This resulted in the adoption of 'a Framework for Qualifications of the European Higher Education Area' (QF EHEA) by the Bergen Ministerial conference (May 2005).[10]

In March 2005 the European Council asked for the adoption of an EQF in 2006, significantly strengthening the political basis for taking this initiative forward. In 2006 the Commission published a consultation document. This document emphasised that the success of the EQF depends on its credibility and relevance for education institutes, employers, policy makers

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[5]   See: http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm
[6]   See: http://ec.europa.eu/education/lifelong-learning-policy/doc1532_en.htm
[7]   The report states that such a framework could stand as a common reference enabling and promoting transparency, transfer and recognition of qualifications and competences in Europe.
[8]   The Maastricht Communiqué states that 'such a framework will improve permeability within education and training, provide a reference for the validation of informally acquired competences and support the smooth and effective functioning of the European, national and sectoral labour markets. The framework should be underpinned by a set of common reference levels. It should be supported by instruments agreed at European level, particularly quality assurance mechanisms to create the necessary mutual trust. The framework should facilitate the voluntary development of competence based solutions at the European level enabling sectors to address the new education and training challenges caused by the internationalisation of trade and technology.'
[9]   Joint Quality Initiative, Shared 'Dublin' descriptors for Short Cycle, First Cycle, Second Cycle and Third Cycle Awards, 2004.
[10] Communiqué of the conference of European ministers responsible for Higher Education, Bergen, 19-20 May 2005, The European Higher Education Area – Achieving the goals, 2005; and see: Bologna Working Group on Qualifications Frameworks, A Framework for Qualifications of the European Higher Education Area, 2005.

and finally individual learners.[11] After the consultation process in 2006, the Recommendation of the Parliament and the Council was finally accepted in April 2008. The Recommendation entails voluntary involvement of countries, not entailing any legal obligations, thus respecting the principle of subsidiarity[12].

The Recommendation of the European Parliament and of the Council of 23 April 2008 (2008/C 111/01) suggests that:

- the MS relate their national qualifications systems to the European Qualifications Framework by 2010[13], either by referencing, in a transparent manner, their qualification levels to the EQF levels, or, where appropriate, by developing national qualifications frameworks;

- by 2012, all new qualification certificates, diplomas and Europass documents contain a reference to the appropriate EQF level;

- the MS use an approach based on learning outcomes when defining and describing qualifications, and promote the validation of non-formal and informal learning;

- the MS promote and apply the principles of quality assurance in education and training;

- the MS designate national co-ordination points, in order to support the relationship between national qualifications systems and the European Qualifications Framework.

The EQF is a translation grid for qualifications around Europe and at its core are its eight reference levels (see **Annex 1**), covering basic to most advanced qualifications. Each country is expected to classify its national qualifications into the eight EQF levels by means of its National Qualifications Framework (NQF) or the levels of its national qualifications system. Countries are not required by the EQF Recommendation to develop National Qualifications Frameworks and can, in principle, relate their qualifications levels to the EQF without formally establishing a national framework. It is envisaged as a meta-framework increasing transparency and supporting mutual trust. It would thereby enable qualifications frameworks and systems at national and sectoral level to be related to each other – thus facilitating the transfer and recognition of the qualifications of individual citizens.[14]

It should be kept in mind that the implementation of the EQF as such leaves a lot open for the MS to fill in and decide, also whether they decide to develop an own national qualifications framework. However, the Recommendation includes a number of key topics which the MS voluntarily agreed to implement and that should be implemented even before the actions promised to be conducted by 2010 and 2012 can be successfully carried out:

- Describing qualifications in terms of learning outcomes

- Promote and apply the principles of quality assurance in education and training

- Designate national coordination points

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[11] European Commission, Commission Staff Working Document Towards A European Qualifications Framework For Lifelong Learning, Brussels, 8.7.2005 SEC(2005) 957, 2005. The initial plan for the EQF, besides the qualification levels also included credit transfer. In the consultation this deemed to be too complex to implement. The EQF (qualifications) and ECVET (credits) were then considered two separate, though connected, processes. The idea that qualifications and credits are interlinked is particularly strong in the Anglo-Saxon countries. For instance the English CQF includes both qualification levels and a credit system.

[12] OJ C 111/1 Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), 6.5.2008, article 15.

[13] "Referencing of the 27 member state NQFs against the EQF has been prioritised, and most countries indicate that they plan to have completed the necessary processes by the end of 2011. See: ETF, Transnational qualifications frameworks, 2010.

[14] European Commission, Commission Staff Working Document Towards A European Qualifications Framework For Lifelong Learning, Brussels, 8.7.2005 SEC(2005) 957, 2005.

It is argued that the implementation of the EQF as such (referencing qualifications to EQF levels and developing an 'EQF-tag' on each qualification, certificate, and Europass CV) can only *truly* take place when these three measures (of which the first one is the most important), have been implemented in the MS.

As a result of this learning outcomes approach, the learning pathways (in terms of institution and duration) by which the outcomes have been reached, become less important. Hence, non-formal and informal forms of learning increase in relevance to obtain a qualification. Also, the value of these forms of learning are assumed to be better standardised, recognised and valued by individuals, the economy and society at large. The learning outcome approach will hence contribute to making lifelong learning a reality[15]. However, there are some critical remarks to be made using the concept of learning outcomes since it is argued that the scope for misunderstanding and confusion regarding the concept is considerably great[16] (see Section 3.3.1). The shift to learning outcomes masks the risk implied by weakening institutions and underestimates the learning process itself[17].

2.2. Rationale behind the EQF: Mobility and lifelong learning

As we have seen, the EQF is a translation device between national qualifications systems and aims at promoting workers' and learners' mobility and lifelong learning. The necessity of promoting workers' and learners' mobility and lifelong learning has been explicitly included as general theme in European policies. The 2000 Lisbon declaration called for giving higher priority to lifelong learning as a basic component of the European social model and facilitating labour mobility by providing a common European format for curricula vitae. Also, the Lisbon Council concluded that increased transparency of qualifications should be one of the main components necessary to adapt education and training systems in the Community to the demands of the knowledge society[18].

The 2000 Memorandum on lifelong learning[19] emphasises the importance of building an inclusive society where good quality learning is accessible for all. This means that lifelong learning should underlie all educational sectors, not only strictly adult learning, offering equal opportunities for access to good quality learning throughout life to all people, and in which education and training provision is based first and foremost on the needs and demands of individuals[20].

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[15] OECD, Qualifications Systems, Bridges to Lifelong Learning, 2007.
http://www.oecd.org/dataoecd/24/63/38465471.pdf

[16] Johnson, S., Wolf, A. Qualifications and mobility in a globalising world: why equivalence matters. Assessment in Education: Principles, Policy and Practice, 16, 2009, pp. 3–11.; Brockmann, M. et al., Difficulties in recognising vocational skills and qualifications across Europe, Assessment in Education: Principles, Policy and Practice, 16, 2009, pp. 97–109.

[17] "For instance, Young, Raffe and Allais (Allais, S., Raffe, D., Young, M., Researching NQFs: Some conceptual issues, 2009) argue that 'a reform approach which is designed to challenge education institutions and providers is likely to have a dramatically different effect in countries where these institutions are weak or non-existent'. Concerns about the shift to learning outcomes are also related to the risk of neglecting learning processes. Grootings (Grootings, P., Discussing national qualification frameworks. Facilitating policy learning in practice, in: ETF Yearbook 2007. Quality in Vocational Education and Training (Turin, European Training Foundation), 2007) and Castejon (Castejon, J. M., National Qualifications Frameworks: tools for relating learning and employability in North Africa and the Middle East, in: ETF Yearbook 2007: Quality in Vocational Education and Training (Turin, European Training Foundation), 2007) explored the way NQFs impact on the learning process, with both authors warning about the preoccupation with learning outcomes at the expense of the learning process itself." In: Chakroun, B, National Qualification Frameworks: from policy borrowing to policy learning, in: European Journal of Education, Vol. 45, No. 2, 2010, Part I, 2010.

[18] Lisbon European Council (2000). 'Presidency Conclusions':
http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/00100-r1.en0.htm

[19] European Commission, Commission Memorandum of 30 October 2000 on lifelong learning [SEC(2000) 1832 final], 2000.

[20] See also: Field, John, Lifelong learning: the new educational order, 2006.

Given demographic change, rapid social, technological and economic change, lifelong learning has become a necessity for all. All these changes call for a continuous updating and renewal of knowledge, skills and competences, both for the working population to get or maintain a job, and for the older workers to keep up to date with the changing society. The EU2020 strategy emphasises the need for lifelong learning in order to aim at smart, sustainable and inclusive economic growth[21]. The recent economic crisis further emphasises the need to update and upscale the competences of the workforce to maintain sustainable and quality jobs, also given the trend that the low qualified are most strongly hit by the crisis[22]. Making use of knowledge and skills acquired outside of the formal education system is an important element that needs to be taken into account in establishing a lifelong learning culture[23].

A related change is the ongoing globalisation and mobility of workers between European and third countries. Within the EU, given the single market, individuals should be able to travel, study and work in each of the MS without facing severe barriers. This includes that their qualifications, certificates and knowledge should be recognised in other EU MS. Mobility of qualified professionals is low in the European Union. However, there seems to be a major unexploited potential for mobility. Currently, as indicated by a 2010 Eurobarometer survey[24], 28 percent of EU citizens are considering working abroad. Recognition of professional qualifications is key to making the fundamental internal market freedoms work effectively for EU citizens[25]. Also, the Mario Monti report on the future of the single market indicated that labour mobility is hampered by a number of barriers, including the complexity of international recognition of professional qualifications[26].

All in all, given the EU 2020 objectives, lifelong learning and mobility will have to become a reality, but are seriously hampered and complicated at system level by a lack of communication and co-operation between countries and education sector relating to the recognition of their qualifications and providing transparency of the education system. Also, at institutional level, the lack of communication between different education providers and employers creates in-transparencies for all (education providers, employers, workers and learners).

Increasing the transparency in qualifications and educational systems, making qualifications more readable and understandable across different countries, would therefore be a means to stimulate lifelong learning and mobility to meet the current and future European challenges[27]. The way in which different qualifications are related to each other will also facilitate the use of different learning pathways within a country, also after leaving initial education.

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[21] European Commission, Communication from the Commission, Europe 2020, A strategy for smart, sustainable and inclusive growth, COM(2010) 2020 final, Brussels, 3.3.2010

[22] See: European Commission, Communication from the Commission to the European Parliament and the Committee of the Regions, New Skills for New Jobs, Anticipating and matching labour market and skills needs {SEC(2008) 3058}, 2008; Cedefop, The skill matching challenge Analysing skill mismatch and policy implications, 2010.

[23] European Commission, Communication from the Commission to the Council, the European Parliament, the Economic and Social Committee and the Committee of the Regions, Action Plan on Adult learning It is always a good time to learn, 2007.

[24] TNS Opinion & Social, Eurobarometer n° 363, Internal Market: Awareness, Perceptions and Impacts, 2011

[25] See: European Commission, Proposal for a Directive of the European Parliament and the Council amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation [...] on administrative cooperation through the Internal Market Information System, Brussels, 19.12.2011, COM(2011) 883 final, 2011/0435 (COD), 2011.

[26] Monti, Mario, A new strategy for the Single Market at the service of Europe's economy and society, report to the President of the European Commission José Manuel Barroso, 9 May 2010.

[27] European Commission, Commission Staff Working Document Towards A European Qualifications Framework For Lifelong Learning, Brussels, 8.7.2005 SEC(2005) 957, 2005.

2.3. Types of qualifications frameworks, roles and functions

A way to facilitate transparency between educational systems and individual qualifications is to establish national qualifications frameworks, linking all qualifications in a country to each other. A qualifications framework is an instrument for the development and classification of qualifications (e.g. at national or sectoral level) according to a set of criteria (e.g. using descriptors) applicable to specified levels of learning outcomes[28]. The principal aim of these frameworks at national level (NQFs) is to clarify for each group of stakeholders (workers, students, parents, employers, policy makers and learning providers) the main educational pathways towards a qualification. Also it describes how progress can be made, to what extent transfer is allowed and on which basis decisions on recognition are taken. Qualification frameworks are also used for quality assurance and development purposes; providing a reference for improvement at local, regional, sectoral and national level[29]. National qualification frameworks can also be used to determine the relationship and the horizontal and vertical continuum between different forms of qualifications[30].

The introduction of qualifications described in terms of learning outcomes and the related introduction of competence-based learning, can be seen as an attempt to shift control of the content of education programmes from providers (criticised for being unable to meet the new demands) to employers (who, it was argued, were better placed to break down the barriers between academic and vocational systems)[31]. It is argued that the shift to learning outcomes brings the consumer, the individual and employer back into the centre of the learning process, instead of the learning provider[32].

The establishment of national qualifications frameworks (NQFs) can be regarded as a world-wide phenomenon[33] and due to the recent policy attention towards the European Qualifications Framework, developments in some of the European MS are strong.

Despite major differences in qualifications frameworks across the globe, it is still possible to summarise the aims of national frameworks as follows:[34]

- To establish national standards of knowledge, skills and wider competences[35];

- To promote the quality of education and training provision[36];

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[28] Cedefop, Terminology of European education and training policy, 2008.
[29] European Commission, Commission Staff Working Document Towards A European Qualifications Framework For Lifelong Learning, Brussels, 8.7.2005 SEC(2005) 957, 2005.
[30] Coles, M., A Review of International and National Developments in the Use of Qualifications Frameworks, 2006.
[31] Young, M., National Qualifications Frameworks: Their feasibility for effective implementation in developing countries (Geneva, ILO), 2005. See: ETF, Transnational qualifications frameworks, 2010.
[32] Cedefop, The shift to learning outcomes: Policies and practices in Europe, 2009.
[33] The European Training Foundation (ETF) lists 126 countries where NQF developments currently are ongoing: ETF, Transnational qualifications frameworks, 2010.
[34] Based on: Coles, M., A Review of International and National Developments in the Use of Qualifications Frameworks, 2006. The objectives of NQF in Europe most often mentioned are the following: 1) Increase international transparency of education and training and facilitate comparison and transfer of qualifications by implementing the EQF; 2) Increase transparency of national qualifications systems and improve the permeability of education and training systems to facilitate transfer and progression; 3) NQFs can be seen as a tool for promoting lifelong learning; 4) Promote and speed up the shift to a learning outcomes based approach throughout the education and training system; 5) Facilitate validation of non-formal and informal learning; 6) Improving the consistency of national qualifications; 7) Provide a reference point for quality assurance. While quality assurance arrangements already exist in most countries, the introduction of a comprehensive framework makes it possible to see how arrangements in different sub-systems interact and reinforce each other; 8) Strengthen cooperation between stakeholders and in particular establish a closer link to the labour market. See: Cedefop, National qualifications frameworks development in Europe, 2011. Adjusted by the authors.
[35] This could include: defining the outcomes of a national curriculum; the process by which skills needs of sectors and the national economy are identified and classified; the description of national levels of education and training. It could also cover, albeit slightly distanced from the NQF, the introduction of competence based standards for occupations and with this the development of competence based training and qualifications.

- To provide a system of coordination and for comparing qualifications by relating qualifications to each other[37];

- To promote and maintain procedures for access to learning, transfer of learning and progression in learning[38].

- To reference the national qualifications to transnational qualifications frameworks, such as the EQF.

Three general characteristics of NQFs can be pointed out[39]. Firstly, qualifications and qualifications frameworks are social constructs, deeply rooted in social practices and political interests. Secondly, they are multi-purpose tools, as can be seen here above, whereby the last purpose can be seen as the main driver behind the establishment of many European NQFs. Thirdly, NQFs differ. The difference related to the national context, size and diversity in the education system, its governance arrangements, the culture of policy-making, the structure and organisation of the labour market, the concept of qualification used and its tradition. Also, NQFs differ in scope (HE, VET, lifelong learning) and design (number of levels, descriptors used, types of learning outcomes) how they are guided and controlled (government, stakeholder involvement). Taking into account all these factors that make NQFs differ, three types of NQFs can be distinguished[40]:

- A **communications framework** that takes the existing system as starting point and aims to make it more transparent;

- A **transformational framework** that takes a proposed future system as staring point in order to transform the existing system;

- A **reforming framework** that can be considered as an intermediate category. It takes the existing system as starting point, but uses the framework to initiate reforms to overcome certain gaps or problems.

Most European NQFs are presented as communications frameworks[41], but in fact, in many European countries more and more reform agendas are connected to the NQF, making it increasingly a reform framework[42].

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[36] By regulating the approval of qualifications to the framework it is possible to define acceptable national standards. These quality standards might reference the capacity of the body issuing the qualification to deliver learning, assess achievements and issue certificates. Sometimes these 'approved' qualifications are favoured in national funding regimes.

[37] By creating a means by which qualifications can be assigned to a national level of qualification users (individuals, providers of learning and those recruiting for jobs and learning programmes) are expected have increased confidence in the national qualification system. Under this aim the framework is used to harmonise or rationalise qualifications systems that are sometimes overlapping and compete for the attention of providers and learners.

[38] A framework of qualifications can make clear the entry points for learning for qualification and where a qualification could lead in terms of higher or wider learning. Transfer of learning from one qualification to another is also possible, especially if some kind of convention for recognising units of learning (or credits) is in place. Some NQFs have a credit-based system as an integral part of the framework. Through achieving this aim a qualifications framework supports lifelong learning.

[39] Raffe, David, National Qualifications Frameworks: European experiences and findings in an educational and an employment perspective, Forthcoming in Büchter, K., Dehnbostel, P. and Hanf, G. (eds) Der Deutsche Qualifikationsrahmen (DQR) - Ein Konzept zur Durchlässigkeit und Chancengleicheit im Bildungssystem? Bonn: BIBB, (Forthcoming).

[40] See: Raffe, David: Towards a dynamic model of National Qualifications Frameworks. In: Allais, Stephanie; Raffe, David; Young, Michael (eds.) Researching Qualifications Frameworks: some conceptual issues. ILO Employment Working Paper No. 44. Geneva 2009, pp. 23-42, 2009; Raffe, David, National Qualifications Frameworks: European experiences and findings in an educational and an employment perspective, Forthcoming in Büchter, K., Dehnbostel, P. and Hanf, G. (eds) Der Deutsche Qualifikationsrahmen (DQR) - Ein Konzept zur Durchlässigkeit und Chancengleicheit im Bildungssystem? Bonn: BIBB, (Forthcoming).

[41] See: Bjornavold, Jens; Pevec Grm, Slava: Development of National Qualifications Frameworks (NQFs) in Europe: CEDEFOP overview- June 2010. In: EQF Newsletter, July 2010, pp. 6-7. http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/news2_en.pdf, from: Raffe, David, National Qualifications Frameworks: European experiences and findings in an educational and an employment

These differences between NQFs across Europe and across the globe, affect the effectiveness of NQFs depending on a range of social factors, such as trust, understanding of the language and cultures, the intrinsic and institutional logic and political acceptability. Also, the purposes it aims at, how these are pursued and who is politically responsible impacts the effectiveness of NQFs. According to contextual differences, NQFs tend to fit better with outcome-based, modular qualifications systems such as the UK and Ireland, where qualifications are the sum of finalised partial qualifications (modules) than institution-based systems such as in Germany, where qualifications and competences are regarded as holistic concepts.

NQFs could also be distinguished between 'outcomes-led' and 'outcomes-referenced' frameworks[43]. To quote David Raffe:

"*In an outcomes-led NQF learning outcomes are the principal driving force for change and qualifications are described on the basis of learning outcomes alone, without referring to input-based concepts such as the institution, mode or duration of learning. This contrasts with an outcomes-referenced framework, which uses learning outcomes to complement 'input' concepts rather than to replace them, and not as the main agent of change. In an outcomes-referenced framework learning outcomes provide common reference points for diverse qualifications across sectoral, institutional, curricular and pedagogical boundaries; they thereby help to show how different qualifications relate to one another and make the system more transparent.*"[44]

Almost all MS took the EQF referencing exercise as an opportunity to further develop their own National Qualifications Framework[45]. Therefore, the implementation of the EQF entails in many cases the development of an NQF, not existing before. Both implementations however can be regarded as separate processes[46]. The establishment of NQFs is closely monitored by Cedefop[47] and the European Commission. Although the implementation of NQFs and the EQF are different processes, their goals are overlapping. Both processes aim at increasing the transparency of qualifications, labour mobility (recognition) and increasing opportunities for lifelong learning. There are a number of substantial differences between an NQF and any transnational qualifications framework, such as the EQF. Transnational qualifications frameworks[48]:

1. have less regulatory and more communicative purposes;

2. include a wide range of sectors of education and training, if not all;

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perspective, Forthcoming in Büchter, K., Dehnbostel, P. and Hanf, G. (eds) Der Deutsche Qualifikationsrahmen (DQR) - Ein Konzept zur Durchlässigkeit und Chancengleicheit im Bildungssystem? Bonn: BIBB, (Forthcoming).

[42] Raffe, David, National Qualifications Frameworks: European experiences and findings in an educational and an employment perspective, Forthcoming in Büchter, K., Dehnbostel, P. and Hanf, G. (eds) Der Deutsche Qualifikationsrahmen (DQR) - Ein Konzept zur Durchlässigkeit und Chancengleicheit im Bildungssystem? Bonn: BIBB, (Forthcoming).

[43] Raffe, David, The role of learning outcomes in National Qualifications Frameworks, in Bohlinger, S. and Muenchhausen, G. (eds) Validierung von Lernergebnissen/Recognition and Validation of Prior Learning, 2011 (Forthcoming).

[44] Raffe, David, National Qualifications Frameworks: European experiences and findings in an educational and an employment perspective, Forthcoming in Büchter, K., Dehnbostel, P. and Hanf, G. (eds) Der Deutsche Qualifikationsrahmen (DQR) - Ein Konzept zur Durchlässigkeit und Chancengleicheit im Bildungssystem? Bonn: BIBB, (Forthcoming).

[45] See Cedefop, National qualifications frameworks development in Europe, 2011. The only exception mid-2011 is Italy who intends to reference its qualifications levels to the EQF without an established NQF. See chapter on Italy for details. The Czech Republic has developed NQF for professional qualifications and QF for higher education and will reference on the basis of these.

[46] ETF estimated that around the globe 126 countries have already implemented a Qualifications framework or are working on the establishment: see: ETF conference October 2011.

[47] See: Cedefop, The development of national qualifications frameworks in Europe (September 2009), 2009; Cedefop, The development of national qualifications frameworks in Europe (August 2010), 2010; Cedefop, National qualifications frameworks development in Europe, 2011.

[48] ETF, Transnational qualifications frameworks, 2010.

3. have a range of national and regional policies, accords, conventions and protocols supporting them, but are not underpinned by enforceable legislation;

4. have limited, often voluntary, institutional arrangements for governance and management.

2.4. Related European initiatives and tools

Section 2.2 and 2.3, already indicated that the EQF is strongly embedded within European strategic agendas and education policies. Related to these strategic policy agendas (Lisbon agenda, EU2020, ET2010, ET2020, Bologna process and Copenhagen process), a number of initiatives are developed to support the strategies. Hence, the Recommendation on the EQF is closely related to other European initiatives and tools aiming at increasing transparency and comparability of qualifications to facilitate citizens continuing their learning pathways (lifelong learning) and to support mobility.

- **Qualifications Framework for the European Higher Education Area (QF EHEA)**[49]: The QF-EHEA was adopted in the context of the Bologna Process in 2005 (47 European ministers agreed to participate in the Bologna process). It consists of three cycles: Bachelor, Master and Doctorate. Each cycle is described in terms of learning outcomes as defined according to the so-called "Dublin descriptors". The descriptors for the three cycles within the QF EHEA are comparable to the level descriptors of level 6, 7 and 8 of the EQF. There is a close cooperation between the organisations responsible for the implementation of the two frameworks (Council of Europe for the QF EHEA and the European Commission for the EQF).

- **Europass**: Europass provides a framework for transparency of competences and qualifications and is hence closely related to the EQF[50]. The EQF recommendation even includes reference to the Europass documents. Both the European Diploma supplement (HE) and the European Certificate supplement (VET) should include reference to EQF levels after the second round of referencing.

- **Quality assurance (European Standards and Guidelines (ESG) and the European Quality Assurance in Vocational Education and Training (EQAVET))**: The EQF relies on quality education systems where citizens, stakeholders and other MS can trust the quality of the qualifications issued. Therefore quality assurance is at the heart of the EQF. At European level initiatives have been launched, both in HE and VET, to establish common guidelines and frameworks for quality assurance[51]. The Common Principles for Quality Assurance in Higher Education and Vocational Education and Training in the context of the European Qualifications Framework were annexed to the EQF Recommendation. Establishing quality assurance systems takes a long time (see for instance the development of the ESG and EQAVET).

- **Validation of non-formal and informal learning**: The EQF Recommendation specifically addresses the issue of validation of non-formal and informal learning. Since qualifications are described in terms of learning outcomes, in theory the learning pathway becomes less relevant, opening up alternative learning pathways (work-based learning, non-formal learning and informal learning). To make full use

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[49] Bologna Working Group on Qualifications Frameworks, A Framework for Qualifications of the European Higher Education Area, 2005.

[50] European Parliament and the Council, Decision 2241/2004/Ec of the European parliament and the Council of 15 December 2004 on a single European Union framework for the transparency of qualifications and competences (Europass), PJ L 390 of 31.12.2004.

[51] European Quality Assurance in Vocational Education and Training – http://eqavet.eu and European Standards and Guidelines – http://enqa.eu/esg

of this, it should be possible to have recognised the competences already acquired[52]. Currently the Commission is preparing a proposal for a Council Recommendation on the validation of non-formal and informal learning to specifically invite MS and stakeholders to increase possibilities for validation.

- **Credit transfer systems (European Credit and Transfer System (ECTS) and European Credit system for Vocational Education and Training (ECVET))**: Potentially the EQF can be linked to the credit transfer and accumulation systems in HE (ECTS) and VET (ECVET)[53], however in practice, discussions on the definition of learning outcomes that correspond to ECTS credits and the early stage of implementation of ECVET prevent alignment between the two credit systems and the EQF in the near future[54].

- **Recognition of professional qualifications**. Besides developments in VET and HE, initiatives relating to the recognition of professional qualifications are closely related to EQF (Professional qualifications Directive 2005/36). In Europe, the Single Market initiative included measures to facilitate the free movement of professionals. Since the 70s and 80s initiatives have been taken to automatically recognise qualifications of a number of professions. In 2005 a general system was established for professional recognition.[55] The Directive on professional qualifications adopted on 6 June 2005[56] is the legal instrument at EU level that is binding for MS whenever it comes to the recognition of professional qualifications in the field of regulated professions. The Directive prescribes five levels of qualifications on the basis of strict input criteria, covering for example the duration, location and content of the training as a condition for recognition.[57] There is clearly a discrepancy between the five levels of the Directive defined by input variables and the eight levels of the EQF defined by learning outcomes and alignment between the two systems is recommended. A recently published evaluation of the Professional Qualifications Directive against recent educational reforms in EU MS[58] concluded that in practical terms, there is simply not sufficient evidence to state which perspective (input, outcomes) is the more accurate view in recognising foreign qualifications. The

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[52] European Council, Council Conclusions on common European Principles for the identification and validation of non-formal and informal learning of 28 May 2004, 2004.

[53] European Credit System for Vocational Education and Training (ECVET) http://ec.europa.eu/education/lifelong-learning-policy/doc50_en.htm and European Credit Transfer and Accumulation System (ECTS) http://ec.europa.eu/education/lifelong-learning-policy/doc48_en.htm

[54] Information provided by the European Commission, European Commission, Draft report on the implementation of the European Qualifications Framework for lifelong learning in 2008-2011, 2011 (forthcoming).

[55] OJ L 255/22, Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications

[56] This Directive replaces 15 directives in force for many years. It recasts and modernises existing law on recognition of professional qualifications without modifying its basic principles. The new directive has not been yet published.

[57] ETF, Transnational qualifications frameworks, 2010. OJ L 255/22, Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, 2005: Levels of qualifications in the General system Directive : 5 levels in the General System (see article 11): 1) attestation of competence issued by a competent authority in the home Member State, attesting either that the holder has acquired general knowledge corresponding to primary or secondary education, or has undergone training not forming part of a certificate or diploma, or has taken a specific examination without previous training or has three years' professional experience; 2) certificate corresponding to training at secondary level of a technical or professional nature or general in character, supplemented by a professional course; 3) diploma certifying successful completion of training at post-secondary level of a duration of at least one year or professional training that is comparable in terms of responsibilities and functions; 4) diploma certifying successful completion of training at higher or university level of a duration of at least three years and not exceeding four years; 5) diploma certifying successful completion of training at higher or university level of a duration of at least four years.

[58] GHK, Revised Final Report - Study evaluating the Professional Qualifications Directive against recent educational reforms in EU Member States, 2011.

proposal for amending Directive 2005/36[59] maintains the five levels but emphasises that the five levels should have no effect upon the national education and training structures and national policies for implementing the European Qualifications Framework[60]. In the future Directive 2005/36, there could be a greater emphasis on the eight level structure and the learning outcome approach than currently proposed.

- **European Skills, Competencies and Occupations taxonomy (ESCO)**: The Communication on the EU2020 strategy announced that a common language and operational tool for education/training and work will be developed: a European Skills, Competences and Occupations framework (ESCO[61]). The framework is based on three pillars: occupations; skills and competences; and qualifications. The framework consists of a taxonomy of occupations, skills and competences and finally of qualifications. Regarding this last taxonomy, a clear link with the EQF is envisaged, including linking ESCO to the EQF interface for searching national databases of qualifications. However, the terminology used in ESCO and the EQF does not seem to be completely compatible at this moment.

2.5. Concluding remarks

The EQF appears to be relevant given the European challenges ahead and other European strategies, initiatives and tools implemented. However, there is potentially a conflict with other European initiatives. For instance, the approaches taken in the EQF and the Professional Qualifications Directive 2005/36 are diametrically opposed, since the EQF is based on a learning outcome approach to classify qualifications, while the other makes use of input variables for determining the level of a qualification. Also, the number of levels differs (eight compared to five). Moreover, in theory, the EQF and the QF EHEA are aligned. However, it needs to be assessed whether in practice the existence of two frameworks does not lead to confusion (see also Chapter 3 on the implementation of the Recommendation).

In theory, there is a clear link between the final objectives (increased lifelong learning and labour mobility) and the structure of the instrument. By designing and developing a translation device on the basis of the learning outcomes approach, transparency and comparability between education systems in a cross-border perspective and between education sectors within a country will be realised. And herewith, it will stimulate lifelong learning (through a clearer idea about learning pathways) and labour mobility (easier comparison on what a qualification is worth and easier recognition of foreign qualifications). However, it needs to be seen whether this theoretical line of reasoning holds in practice (see Chapter 3 and 4 on the implementation and outcomes of the EQF).

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[59] European Commission, Proposal for a Directive of the European Parliament and the Council amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation [...] on administrative cooperation through the Internal Market Information System, Brussels, 19.12.2011, COM(2011) 883 final, 2011/0435 (COD), 2011.

[60] European Commission, Proposal for a Directive of the European Parliament and the Council amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation [...] on administrative cooperation through the Internal Market Information System, Brussels, 19.12.2011, COM(2011) 883 final, 2011/0435 (COD), 2011.

[61] See: http://ec.europa.eu/social/main.jsp?catId=88&langId=nl&eventsId=242&furtherEvents=yes, European Commission, Presentation fiche: ESCO, the forthcoming European Skills, Competencies and Occupations taxonomy, Brussels, 18 January 2010 EMPL D-3/LK D(2009), 2010.

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3.   IMPLEMENTATION OF THE EQF

KEY FINDINGS

- In the Recommendation on the EQF the MS voluntarily agreed amongst other things to work on referencing their qualifications to the EQF levels. The European Commission can, under the subsidiarity principle, only play a facilitating role. In order to encourage MS to follow up on the recommendation, several instruments are available under the Open Method of Coordination. The open method of coordination is 'designed to help MS to progressively develop their policies'. From previous research on OMC in other policy fields, conditions can be distilled that are crucial for a **successful implementation of the OMC**, namely: 1) preparatory political involvement; 2) common concern; 3) high level of institutionalisation; 4) availability of specific objectives, benchmarks and indicators; 5) involvement and cooperation of stakeholders, and 6) presence of conflict between MS with incentive or reluctance to act. The key findings are structured along these conditions (findings are described both at EU and MS level).

- **Preparatory political involvement at EU level**: The EQF has known a long development period before it was actually formalised with a Treaty-based Recommendation. The commitment amongst EU level stakeholders is strong and the Recommendation and hence the EQF is based on extensive studies and consultations.

- **Preparatory political involvement at MS level**: There are major differences between MS in their starting positions. Some MS already had frameworks in place, or had experience with the learning outcome approach, others did not. Most MS have been involved in the EQF project long before the 2008 Recommendation, but it remains questionable whether all relevant stakeholders, such as employers, employees and the educational sector at MS level have been involved to such an extent that mutual ownership is being created. In most countries, studies (e.g. consultations, technical studies, mapping exercises, pilot studies) have been conducted to provide a solid grounding of an NQF and the referencing to the EQF.

- **Common concern at EU level**: The EQF is built upon a common concern. This common concern is further supported by notes and guidelines to support MS in implementing the 2008 Recommendations. The process can be characterised by 'learning by doing', so therefore the knowledge-base evolved during the process. This evolution is captured by notes drawn up by Cedefop and the European Commission to guide MS in the process. For instance, the list of ten criteria for referencing defined on the basis of experiences, is now used to structure the referencing reports and seems to be a helpful tool. Each of the ten criteria is reflected upon in the referencing report.

- **Common concern at MS level**: Although the terminology used within the EQF Recommendation is not always consistent with other European initiatives, the language is clear enough for MS to develop and relate their own initiatives. Concerning the referencing process, some difficulties are encountered by MS. These difficulties mainly relate to justifying the link between level descriptors of the national system/framework and the EQF, applying the learning outcome approach, positioning certain qualifications (e.g. school leaving certificate), establishing procedures for validation of non-formal and informal learning and applying quality assurance systems attuned to the learning outcome approach. Finally, it remains difficult to see how the common concern develops at 'ground level' (i.e. education

providers, workers, employers and citizens). In order to be fully functional this common concern at ground level needs to be further developed.

- **Institutionalisation at EU level**: The OMC for the implementation of the EQF is Treaty based by means of the 2008 Recommendation. For the period after April 2013, a new mandate is needed to continue working on the implementation of the EQF, if required. Roles and responsibilities at EU level are clearly defined between the EQF AG, the European Commission, Cedefop, Council of Europe, ETF, MS and other stakeholders (e.g. social partners). The human resources within the European Commission to coordinate the work appear to be rather limited; however, there is no indication that this is hampering their facilitating role, which seems to work very well.

- **Institutionalisation at MS level**: The division of roles and responsibilities at MS level depends on the intensity of the approach taken to the implementation of the EQF. In most countries the implementation of the Recommendation on the EQF is in the hands of the Ministry of Education (or alike). Some countries deliberately choose to position the coordination of the development of an NQF outside the Ministry of Education, to position the qualifications framework closer to the labour market and to develop mutual ownership of the framework.

- **Availability of specific objectives, benchmarks and indicators at EU level**: Objectives have been set at EU level and appropriate monitoring systems have been put into place (e.g. by the EQF AG and Cedefop). Although clear EU targets are established within the framework of EU2020 and ET2020, there is no explicit link between the EQF and these targets, concerning the manner in which the EQF will contribute to reaching these targets (e.g. on participation in lifelong learning).

- **Availability of specific objectives, benchmarks and indicators at MS level**: The objectives of the Recommendation are clearly set and deadlines are specified. With regard to the first deadline (referencing national systems to EQF levels), most countries will not finalise their referencing report within the given deadline, but the delay will not be problematic (it is estimated that the delay will be approximately two years). More problematic, however, is the progress in relation to the second deadline, including a reference to the appropriate EQF level at each new qualification and Europass document. Many countries have not even started working on procedures to guarantee that this will happen, even those that finalised their referencing report. This is a concern, since this second step enforces the EQF to touch the ground in MS.

- **Involvement and cooperation of stakeholders at EU level**: Different groups of stakeholders have been involved from the start and are still involved as members of the EQF AG. A closer involvement of other DGs which have a natural stake in the implementation of the EQF (i.e. DG EMPL and DG MARKT) could be further developed to increase the labour market orientation of the EQF.

- **Involvement and cooperation of stakeholders at MS level**: A distinction can be made between two groups of stakeholders, namely the educational sector and labour market related stakeholders. In the MS, in general the first group is more profoundly engaged than the second group. In general, it appears difficult to have the labour market side involved, also due to a lack of interest from the employers' side who in some countries regard the EQF/NQF as not relevant for them. This creates a serious threat to the pursued mutual ownership of NQFs and to the role these frameworks are envisaged to play in relation to the labour market.

- **Presence of conflict between MS with incentive or reluctance to act at EU level:** The involved countries are at different stages in their development and feel the need to provide critical feedback, to support and to stimulate each other while implementing the recommendation, since the implementation at EU level can only be successful where the implementation at MS level is trustworthy. Until now, no deep conflicts have occurred, but potential hazards endanger the implementation (e.g. positioning the school leaving certificate either at level 4 or 5). The future should tell how the OMC will react to these potential conflicts and whether it proves resilient.

- **Presence of conflict between MS with incentive or reluctance to act at MS level:** In general it can be concluded that in countries where the EQF is being used as a reform agenda, conflicts between different stakeholders (e.g. between educational sectors, between the education sector and employers) are more pressing than in countries where the EQF is implemented more technically. In some countries, however, the prior technical implementation leads to debates and conflicts calling for more severe transformations of education systems.

In this chapter the state of play of the implementation will be discussed in detail. In the first section 3.1, criteria for successful functioning of the Open Method of Coordination are introduced against which the progress made, both at EU and MS level, will be discussed. In the sections after this (sections 3.2-3.7), each criterion for success will be discussed in detail, comparing theory and practice. This chapter will be completed with a section containing concluding remarks on the implementation (section 3.8).

3.1. Introduction: criteria for a successful OMC

The legal basis for the implementation of the EQF is the 2008 Recommendation. In this Recommendation the MS voluntarily agreed amongst other things to work on referencing their qualifications to the EQF levels. The European Commission can, under the subsidiarity principle, only play a facilitating role. In order to encourage MS to follow up on the recommendation, several instruments are available under the Open Method of Coordination. The open method of coordination is 'designed to help MS to progressively develop their policies', as it has been defined at the Lisbon meeting in 2000. The OMC was introduced as a new method in order to achieve the Lisbon goals in 2010 and aims to spread best practices and achieve greater convergence towards the main EU goals[62]. According to the Lisbon Council, the OMC can involve the following[63]:

- fixing guidelines for the Union combined with specific timetables for achieving the goals which they set in the short, medium and long terms;

- establishing, where appropriate, quantitative and qualitative indicators and benchmarks against the best in the world and tailored to the needs of different MS and sectors as a means of comparing best practices;

- translating these European guidelines into national and regional policies by setting specific targets and adopting measures, taking into account national and regional differences;

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[62] Lisbon European Council (2000). 'Presidency Conclusions':
http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/00100-r1.en0.htm
[63] Lisbon European Council (2000). 'Presidency Conclusions':
http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/00100-r1.en0.htm, paragraph 37.

- periodic monitoring, evaluation and peer review organised as mutual learning processes.

Ideally, as has been stated by Shaw and Laffan "the OMC development proceeds from common objectives establishing a field of common concern. Progress towards objectives can be measured once common indicators are established. Indicators allow comparison of performance of MS that is, in turn, used to set targets. Once targets are set MS or the EU draw up action plans to meet the objectives. Peer reviewing allows badly performing MS to draw lessons from best practice"[64].

In order to analyse the OMC in the implementation of the EQF and to be able to make recommendations for the future, it is important to take into account conditions for successful use of the OMC. From previous research on OMC in other policy fields, conditions can be distilled that are crucial for successful implementation of the OMC[65]. These conditions are presented and explained below[66]. The different conditions apply to both the EU and to the MS.

- **Preparatory political involvement**: The first condition is previous preparatory political involvement. Some steps are often taken in the past that have led to an increased awareness of, or involvement in a topic. A certain foundation needs to be existent in order to continue developing a policy field. This certainly applies to the EU level where many MS need to be familiar with the topic, but also on the MS level itself where the policy field needs to have had a certain history. Not only does the topic need to be embedded in the national culture, but the culture itself also determines the way people cooperate with each other. When developing a certain policy field that is hardly embedded in national culture, more time will be needed to gain political support.

- **Common concern**: Secondly, there should be a common concern among MS that it is important to develop a certain policy field. There should be a European discourse on the topic in order to gain similar understanding of the definitions, the instruments available and an agreement to reach a certain quality level. As a result, a feeling of shared responsibility should be created which is the main drive behind the policy developments made and which also serves as a motivation for improvement of national policies. At the national level, however, the civil society should also be aware of the importance of the policy developments and be willing to contribute to achieving the common objectives. Instead of a political concern it should be considered a personal or public concern.

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[64] Laffan, Brigid, Shaw, Colin, Classifying and Mapping OMC in Different Policy Areas, New Gov-New Modes of Governance, 36, 2005:
www.eu-newgov.org/database/DELIV/D02D09_Classifying_and_Mapping_OMC.pdf.

[65] See: Gornitzka, Ase, Coordinating Policies for a "Europe of Knowledge" Emerging practices of the "Open Method of Coordination" in education and research. Oslo: Centre for European Studies. Working paper No.16. March 2005, 2005; Humburg, Martin, The Open Method of Coordination and European Integration. The Example of European Educational Policy. Berlin: Jean Monnet Chair for European Integration and the Freie Universität Berlin. Working paper No.8, 2008; Newgov, Classifying and mapping OMC in different policy areas. Reference number: 02/D09. Dublin: University College Dublin, 2005; Ruiter, de, Rik, 'Variations on a Theme. Governing the Knowledge-Based Society in the EU through Methods of Open Coordination in Education and R&D'. European Integration. Vol.32. No.2: 157-173, Routledge Taylor and Francis Group, 2010; Tholoniat, Luc, 'The Career of the Open Method of Coordination: Lessons from a ' Soft' EU Instrument'. West European Politics. Vol.33. No.1: 93-117. Routledge Taylor and Francis Group, 2010; Regent, Sabrina, 'The Open method of Coordination: A New Supranational Form of Governance?'. European Law Journal. Vol.9. No.2: 190-214. Oxford: Blackwell Publishing Ltd., 2003.

[66] Broek , Simon, Buiskool, Bert-Jan, Hake, Barry, Impact of ongoing reforms in education and training on the adult learning sector (2nd phase), 2011. Adjusted by authors.

- **High level of institutionalisation**: The third condition of successful implementation of the OMC is a high level of institutionalisation. This means that an organisational structure exists where people continuously work on the coordination and improvement of a specific sector. Someone has to take on the role of coordinator in order to coordinate a large scale cooperation process such as the OMC. As the European Commission only has limited competences, a certain treaty base must exist which allows the European Commission to exert some influence. Also at the national level there needs to be a clear organisational structure coordinated by a particular party. Someone has to take the lead in order to get the subject on everyone's agenda and to create a platform for discussion.

- **Availability of specific objectives, benchmarks and indicators**: Another condition is the availability of objectives, benchmarks and indicators. Although this forms an official part of the OMC process, specific SMART formulated objectives are not always present. Consequently, it is often difficult to stimulate concrete actions and to measure results. Also, on the national level specific objectives are not always formulated. The question is if there are any measurable objectives, benchmarks or indicators available which give a clear direction to what a specific policy is supposed to achieve.

- **Involvement and cooperation of stakeholders**: The fifth condition, namely the involvement and cooperation of stakeholders, is of crucial importance for the success of the OMC, as the method is theoretically supposed to work bottom-up. Guidance and coordination at the community level will only be effective and sustainable, if the programme is supported by the MS their civil society and actively implemented at the local level. Therefore, not only should stakeholders be willing to participate in EU events and meetings on certain topics, but also stakeholders should be involved in national policy making, development and implementation.

- **Presence of conflict between MS with incentive or reluctance to act**: A final condition is the presence of a conflict (policy directions / ideology) between MS with an incentive to act or reluctance to act. Because of a conflict of opinions, the MS with an incentive to act will try to persuade the reluctant MS to join them in developing a particular policy field. If there is no conflict, no debate will follow and few actions will be initiated. The same applies to the national level, where the more reluctant parties will have to be convinced of the importance of a potential national priority. In order to get a topic on the national agenda someone needs to be absolutely convinced of its importance and lobby for more support.

In the sections below the practical OMC procedure concerning the EQF is examined against the factors for successful OMC procedures. Hence, practice and theory are confronted with each other with the aim of identifying where there is room for improvement.

3.2. Preparatory political involvement[67]

In this section the focus is on prior developments before the 2008 Recommendation, both at EU and MS level. It concerns prior studies, stakeholder involvement but also a discussion on the different points of departure for the MS.

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[67] The first condition is previous preparatory political involvement. Some steps are often taken in the past that have led to an increased awareness of, or involvement in a topic. A certain foundation needs to be existent in order to continue developing a policy field. This certainly applies to the EU level where many Member States need to be familiar with the topic, but also on the Member State level itself where the policy field needs to have had a certain history. Not only does the topic need to be embedded in the national culture, but the culture itself also determines the way people cooperate with each other. When developing a certain policy field that is hardly embedded in national culture, more time will be needed to gain political support.

3.2.1. Preparatory involvement at EU level

The process of designing, developing and implementing the EQF did not start after the acceptance of the Recommendation in 2008. The EQF knows a long preparatory phase dating back to the 1998 'European forum on transparency of vocational qualifications'. The aim of this forum was to support and facilitate the mobility of workers across national boundaries within Europe by removing obstacles to mobility resulting from a lack of transparency of vocational qualifications[68]. Also, as has already been mentioned, the agreements between Ministers at the Lisbon Council in 2000, the Copenhagen process and preparatory work in relation to higher education within the Bologna process paved the way for MS to increase their cooperation in the field of education, leading to initiatives such as the EQF, ECVET, Europass and EQAVET[69].

Concerning the creation of the EQF, in 2005, EU Heads of Government requested the creation of the policy tool (following the 2004 Recommendations). This decision formed the basis for wide public consultations on the EQF of policy makers, social partners, stakeholders and experts in qualifications systems throughout Europe[70]. In 2005/2006 this consultation round was organised. The European Commission published a consultation document on the establishment of the EQF. The Commission received approximately 120 responses from 31 European countries. The largest group of responses came from national and regional authorities (35 percent of responses), followed by education associations and NGOs (Non Governmental Organisations) (23 percent), the sectors (14 percent) and the social partners (8 percent from employers, 4 percent from the trade unions)[71]. The consultation round called for clarification, simplification and testing of the framework. Other issues which were brought up by stakeholders include the definition of level descriptors (predominantly the third 'pillar' concerning competences); the link to the higher education framework and the Bologna process; national qualifications systems and their link to the EQF; and the role of sectors[72]. The initial plan for the EQF also included credit transfer besides the qualification levels. In the consultation this deemed to be too complex to implement. The EQF (qualifications) and ECVET (credits) were consequently considered two separate, though connected, processes[73]. Finally, concerning the Directive on the Recognition of Professional Qualifications, the limited number of stakeholders who commented on the relationship between the EQF and the Directive underlined the need for complementarity between these instruments[74].

At EU level the development and the implementation of the EQF has had, and still has, strong commitment from the institutions involved (EC, Cedefop, ETF and the Council of Europe).

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[68] See: Pettersson, S, Knowledge development and deliberative reasoning - the European forum on transparency of vocational qualifications, in Taking steps towards the knowledge society: reflections on the process of knowledge development, eds B Nyhan & E Centre for the Development of Vocational Training, Cedefop reference series no. 35, Cedefop, Luxembourg, pp.45-54, 2002. See as well: Bjornavold, Jens, Burkart, Sellin, Recognition and Transparency of Vocational Qualifications; The Way Forward. Discussion Paper (Cedefop), 2007.

[69] The relationship between EQF and the Bologna process is discussed in detail in Section 3.4.3.

[70] See: European Commission, Commission Staff Working Document Towards A European Qualifications Framework For Lifelong Learning, Brussels, 8.7.2005 SEC(2005) 957, 2005.

[71] See: Pôle Universitaire Européen de Lorraine, Summary of responses received to the Commission's consultation on the EQF during the 2nd half of 2005, 2006:
http://ec.europa.eu/education/policies/educ/eqf/results/summary.pdf

[72] See: Pôle Universitaire Européen de Lorraine, Summary of responses received to the Commission's consultation on the EQF during the 2nd half of 2005, 2006:
http://ec.europa.eu/education/policies/educ/eqf/results/summary.pdf

[73] The idea that qualifications and credits are interlinked is particularly strong in the Anglo-Saxon countries. For instance the English CQF includes both qualification levels and a credit system.

[74] See: Pôle Universitaire Européen de Lorraine, Summary of responses received to the Commission's consultation on the EQF during the 2nd half of 2005, 2006:
http://ec.europa.eu/education/policies/educ/eqf/results/summary.pdf

In addition, already in the development of the EQF (prior to the recommendation) the implementation has been supported by projects within the Lifelong Learning Programme (2006-2013) on sectoral qualifications[75].

3.2.2. Preparatory involvement at MS level

As mentioned, in 2005 already Heads of Government requested the creation of the EQF. Consequently, all countries were involved in the preparatory phase of the EQF before the 2008 Recommendation by means of consultation rounds, studies and national discussions on developing NQFs. Although all MS were involved, differences exist between countries concerning the breath and depth of this preparatory political involvement. In most countries the involvement remained at ministerial level, not involving other important stakeholders. In some countries there was political involvement and commitment from the government to act at a high political /governmental level. At lower levels, for instance within education sectors, regional governments and other stakeholders, however, this political commitment was sometimes lacking. In some federally organised countries there are clear differences and difficulties to establish political involvement between different governmental levels, each having their own competence. For instance in Italy, the qualifications of general education and higher education are governed by the State, while the VET qualifications are governed by the Regions. One of the major challenges is to compare, align and reference the regional qualifications in order to develop a national qualifications framework. The diversity in qualifications in Italy is huge and the question is justified how much diversity an NQF can deal with before it looses its functionality of creating transparency. In federal states, such as Italy, there are many governmental levels involved and consensus needs to be sought on all of these levels.

In addition differences existed between MS with regard to the point of departure. Some of the MS already had long-established frameworks, were in the middle of evaluating and reforming them, while others still had to discuss and implement the basic principles, such as the learning outcome approach in describing qualifications. This difference in the initial stages influenced progress made with regard to the implementation of the Recommendation on the EQF and to set up NQFs. Three groups of countries (EU MS, EEA countries and Accession countries) can be identified taking into account **their point of departure when accepting the Parliament and Council Recommendation in 2008**[76]:

- **Countries at an advanced stage** already having established qualifications frameworks and advanced in describing qualifications in terms of learning outcomes (FR, IE, MT, UK);

- **Countries at intermediate stage** not having comprehensive qualifications frameworks, but generally, qualifications are described in terms of learning outcomes (or similar) (CZ, DK, FI, IS, NL, NO, PT, ES, SE);

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[75] See: EACEA, Compendium 2007, KA 1 — Policy Cooperation and innovation in lifelong learning: Studies and Comparative Research European Qualifications Framework (EQF), 2007: http://eacea.ec.europa.eu/llp/results/2007/documents/subprogrammes-results/compendia2007_ka1.pdf; EACEA, Compendium 2008, Lifelong Learning Programme: Key Activity 1 transversal programme; Studies and Comparative Research; Award of grants for actions to develop and implement the European Qualifications Framework (EQF); National Lifelong Learning Strategies (NLLS), 2008: http://eacea.ec.europa.eu/llp/results/2008/ka1_studies_nlls_eqf_compendium_2008_en.pdf; EACEA, Compendium 2009. Lifelong Learning Programme Key Activity 1 Policy cooperation and innovation, 2009: http://eacea.ec.europa.eu/llp/results_projects/documents/c09ka1_en.pdf

[76] Based on: Cedefop, The Development of National Qualifications Frameworks in Europe 26 November 2008, 2008.

- **Countries at an initial stage** not having comprehensive qualifications frameworks and qualifications are not yet described in terms of learning outcomes (AT, BE, BG, HR, CY, EE, DE, EL, HU, IT, LV, LT, LU, PL, RO, SK, SI, TK).

To illustrate the different points of departure in 2008 the text box below provides illustrative descriptions from three countries.

Box: Examples of different points of departure (2008)

UK-Scot: As the Scottish Credit and Qualifications Framework (SCQF) was developed and implemented in 2001, and therefore preceded the development of the EQF, the first stage of the implementation of the EQF entailed referencing the existing 12-level SCQF to the 8-level EQF. When the SCQF was launched in 2001 much of its architecture was already in place or at an advanced stage of implementation. Most mainstream Scottish qualifications were outcomes-based, albeit with varying and typically loose interpretations of outcomes[77].

FI: Finland has not developed a qualifications framework, but has extensive experience in applying a learning outcomes approach to its education and training system. This applies in particular to the VET qualifications but increasingly to general and higher education as well[78].

BE-vl: The Flemish Community had not developed a qualifications framework in 2008 and also, the learning outcome approach was not yet implemented. However, there is full agreement that an NQF must be based on learning outcomes. A series of pilot projects were finalised in spring 2007 testing the learning outcomes approach and the link to the qualifications framework in a range of sectors (EQF levels 1-5). Similar projects have also been carried out by Bologna promoters for EQF levels 6-8. The general conclusion of these test projects is that the descriptors developed for the Flemish framework are useful for classifying qualifications and only require minor changes and adaptations[79].

Studies conducted supporting the development of an NQF and the implementation of the EQF

As we have seen at European level, studies have been conducted on finding the right referencing levels, researching implementation issues and monitoring the progress made. In addition, within the Lifelong Learning programme sectoral studies have been conducted to support developments in establishing learning outcome approaches, qualifications frameworks, validation procedures and quality assurance. At national level, the processes are supported by research projects as well. These research projects focused as well on determining level descriptors, mapping the education sector, the use of learning outcomes and many more issues. The use of studies however differs across countries. In some of the countries the research base is solid, while in others, the whole process is considered rather a political process, where less input from research was expected. In the box below some examples are provided from the countries, discussing the role of studies and their impact on the implementation.

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[77] ILO, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, 2010.
[78] Cedefop, The Development of National Qualifications Frameworks in Europe 26 November 2008, 2008.
[79] Cedefop, The Development of National Qualifications Frameworks in Europe 26 November 2008, 2008.

Box: Examples of studies to support the developments

IT: The referencing itself has been approached as a technical study conducted by the NCP, ISFOL (the Italian Institute for the Development of Vocational Training for Workers). This 'study' concerns a mapping exercise on qualifications in Italy, compares the learning outcomes described and assesses the 'best fit' of the learning outcomes with the EQF level descriptors. Within a European context (within the LLP 2006-2013) some sectoral projects were conducted to analyse sectoral qualifications in different countries (for instance in the agricultural sector). One of the outcomes is that the diversity in culture, tradition, size of the sector, national conditions (economy, ICT, social) and objectives in educational offer, are very difficult to bridge in defining and describing qualifications.

The EQF-REF project: Several countries are involved in the EQF-REF project (Austria, Bulgaria, Czech Republic, Finland, Germany and the Netherlands). The purpose of the EQF-Ref project is to facilitate communication between the partner countries, to enhance learning from each other and to develop 'mutual trust' in referencing qualifications levels to the EQF. In particular, the project aims to identify procedures of 'good practice' for referencing qualifications levels to the EQF and to propose the structure of the EQF referencing reports[80].

SE: No actual studies or impact assessments have been carried out in Sweden. However, the National Agency for Higher Vocational Education (Myndigheten för yrkeshögskolan, YH), the NCP did, by means of stakeholder consultations and discussing the matter in expert and working groups, investigate the implications of opening up the top-levels of the framework to non-academic qualifications. After careful deliberation, it was decided that the framework would benefit from opening up all levels to all qualifications, and that the potential merits of opening up the framework (i.e. validation of non-formal and informal learning and a broad use of the framework) outweigh the potential drawbacks (i.e. opposition from universities and quality assurance). The YH therefore advised an open framework in its proposal to the government.

PL: A broad stakeholder consultation was carried out in Poland and the results of this consultation have been published[81]. The consultation identified many national barriers for lifelong learning. According to the report drawn up on the basis of the consultation, the recognition of qualifications is just one barrier among many probably more serious ones. Also, the consultation process itself is evaluated with a questionnaire among stakeholders[82]. A majority of the stakeholders is positive about the process and effectiveness of the consultations. In addition, the involved research centre is carrying out several evaluation studies, for example on mobility issues and the introduction of ECTS. Finally, a SWOT analysis on strengths and weaknesses was conducted taking into account the educational system.

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[80] See www.eqf-ref.eu (cited 21 december 2011).
[81] Dębowski, H., Chłoń-Domińczak, A., Lechowicz, E., Trawińska-Konador, K., Sławiński, S. *Report of the debate*, 2011.
[82] Dębowski, H., Chłoń-Domińczak, A., Lechowicz, E., Trawińska-Konador, K., Sławiński, S. Report of the debate: Appendix 2 Results of the evaluation questionnaire, 2011.

DE: In order to test the practical suitability of the structure of the envisaged/ developed framework and its level descriptors, the newly developed DQR was put on trail in a pilot in four sectors (IT, metal, health and the trade sector). In the period May – October 2009 qualifications were tested by linking them to appropriate levels of the DQR. The testing phase involved a broad group of stakeholders (experts, formal education sectors, social partners). For each of the four sectors a report has been drawn up including elaborated accounts of the discussions taking place[83]. Following the evaluation of the testing phase some amendments were included in the final proposal[84]. These amendments mainly concerned sharpening the level descriptors.[85] One of the amendments that stands out in particular is the redefinition of the concept of 'competence'. It was found that the initial definition as established in the EQF – referring to autonomy and responsibility – was too narrow and stood in the way of opening up the top-levels of the framework to vocational qualifications. In close consultation with the social partners, it was therefore decided to distinguish between 'social competence' and 'self-competence' in defining the concept of competence, thereby de facto adding a fourth 'pillar' to the NQF level descriptors.

3.2.3. To conclude

The long preparatory phase before the publication of the Recommendation in 2008 enabled MS to build ownership of the process of the implementation. The consultation round organised in 2005/2006 resulted in changing the content of the proposed framework. In addition to the consultation, MS were closely involved in the final drafting of the Recommendation and the establishment of the EQF advisory group. Following this, the involvement in the process at MS level was predominantly felt by responsible Ministries (of Education) and the involvement of national level stakeholders (other Ministries, education sectors, social partners) was mostly lacking. A similar conclusion can be drawn at EU level. At EU level, stakeholders from other DGs (e.g. DG EMPL, DG MARKT) have also not been sufficiently engaged in the preparatory phase.

The minimal involvement of key stakeholders at national level at an early stage might hamper the mutual ownership of the national qualifications frameworks. At this stage it is still too early to see whether the lack of involvement at the beginning will lead to a lack of commitment from these stakeholders and finally to irreversible drawbacks of the whole implementation (i.e. decreasing usability of the EQF by employers, workers and citizens).

At national level, there is a wide variety in points of departure. Some countries were well advanced; others still had to initiate processes in this direction.

In many MS, studies were conducted in the preparatory phase to design the NQF, however impact assessments were not conducted often.

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[83] See; DQR, Expertenvotum zur zweiten Erarbeitungsphase des Deutsche Qualifikationsrahmens, 2010.
[84] Cedefop, National qualifications frameworks development in Europe, 2011.
[85] DQR, Expertenvotum zur zweiten Erarbeitungsphase des Deutschen Qualifikationsrahmens, 2010.

3.3.   Common concern[86]

In this section the focus is on developing a common language to pursue the common objectives. Also, procedures and guidelines are discussed to highlight some particular obstacles in working out, developing and balancing the common concern between the MS level and EU level.

3.3.1.   Common objectives and a common language

The objectives of the EQF are clearly defined in the Recommendation (promoting workers' and learners' mobility and lifelong learning through increasing transparency between national qualifications systems and education sectors). As has been indicated, the EQF already has a long history at European level. The desire to increase labour mobility and lifelong learning has been expressed in numerous European strategic documents and is endorsed by several Communications, Recommendations and Commission staff working documents. The MS have been involved in shaping the Recommendation and the whole process is based on a common concern: providing trust in each other's education systems and qualifications.

The whole process of developing and establishing an EQF consists in building a common concern by providing a translation device for levels of qualifications. Already from the first version of reference levels[87], discussions arose on the common language used and hence the terminology related to 'qualifications', 'frameworks', 'learning outcomes' and 'competences'.

The core of the EQF consists in the description of qualifications in terms of learning outcomes. According to the Recommendation the term "'qualification' means a formal outcome of an assessment and validation process which is obtained when a competent body determines that an individual has achieved learning outcomes to given standards"[88].

The concept of "'learning outcomes' means statements of what a learner knows, understands and is able to do on completion of a learning process, which are defined in terms of knowledge, skills and competence"[89] This entails that qualifications are not related to the input, such as the type and nature of the learning provider and the duration of the learning pathway, but on the output[90].

Learning outcomes are described in terms of knowledge, skills and competence. According to the Recommendation[91]:

- 'knowledge' means the outcome of the assimilation of information through learning. Knowledge is the body of facts, principles, theories and practices that is related to a

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[86]   Secondly, there should be a common concern among Member States that it is important to develop a certain policy field. There should be a European discourse on the topic in order to gain similar understanding of the definitions, the instruments available and an agreement to reach a certain quality level. As a result, a feeling of shared responsibility should be created which is the main drive behind the policy developments made and which also serves as a motivation for improvement of national policies. At the national level, however, the civil society should also be aware of the importance of the policy developments and be willing to contribute to achieving the common objectives. Instead of a political concern it should be considered a personal or public concern.

[87]   Coles, Mike, Oates, Tim, European reference levels for education and training: promoting credit transfer and mutual trust, 2005. Study was conducted in 2003-2004.

[88]   OJ OJ C 111/1 Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), 6.5.2008.

[89]   OJ C 111/1 Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), 6.5.2008.

[90]   Cedefop, The shift to learning outcomes: Policies and practices in Europe, 2009.

[91]   OJ C 111/1 Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), 6.5.2008.

field of work or study. In the context of the European Qualifications Framework, knowledge is described as theoretical and/or factual;

- 'skills' means the ability to apply knowledge and use know-how to complete tasks and solve problems. In the context of the European Qualifications Framework, skills are described as cognitive (involving the use of logical, intuitive and creative thinking) or practical (involving manual dexterity and the use of methods, materials, tools and instruments);

- '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. In the context of the European Qualifications Framework, competence is described in terms of responsibility and autonomy.

The terms used are by no means unproblematic. For instance the term 'qualification' in the German speaking countries refers to skills ('Qualifikation'). This created, predominantly in the preparatory phase and in discussions with stakeholders, confusion. Also in relation to the third category 'competence' many debates have taken place, also at MS level when implementing the EQF. Initially, the third category was described as 'autonomy and responsibility'. It was replaced by 'competence' to fit with existing European Commission documents. However, other Commission documents spoke about 'competences' (plural), meaning abilities. The EQF- term competence (in the sense of autonomy and responsibility) is therefore not in line with the "usual use of 'KSC' (Knowledge, Skills and Competences) which refers to a comprehensive ability to apply knowledge, know-how and social abilities, whereas in the EQF, competence is described in the sense of assumption of responsibility and autonomy."[92] To make it even more complicated, the Commission document on key competence for lifelong learning defined competence as a "combination of knowledge, skills and *attitudes* appropriate to the context."[93] Even within the EQF definition the term is at the same time defined as ability (first sentence) and responsibility and autonomy (second sentence).[94] All in all, the concept of competence in the EQF creates a basis for misunderstanding.

Despite the fact that the headings of the level descriptors (knowledge, skills and competence) do create some confusion, the level descriptors are on the other hand relatively easy to understand. Therefore, even though heavy debates took place on the terminology in the years prior to the 2008 Recommendation, the terminology appeared less of a problem during the years in which countries were designing and implementing their frameworks. This is also due to the fact that the EQF Recommendation does not prescribe how national qualifications frameworks or systems should look like. It only asks MS to reference their qualifications to the EQF levels. Furthermore, MS are left free to define the language and concepts needed to describe their education system. The only touch-stone is whether the description of the education systems and the qualification levels is transparent for foreigners and whether links with the EQF levels are demonstrable (later in this section the referencing process will be further elaborated on). Below some examples are presented

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[92] See: Markowitsch, Jörg, Luomi-Messerer, Karin, Development and interpretation of descriptors of the European Qualifications Framework, in: European journal of vocational training No 42/43 – 2007/3, 2008/1.

[93] OJ L 394/10 Recommendation of the European Parliament and of the Council of 18 December 2006 on key competences for lifelong learning (2006/962/EC), 30.12.2006. This concept of competences is in line with the holistic OECD concept: "A competency is more than just knowledge and skills. It involves the ability to meet complex demands, by drawing on and mobilising psychosocial resources (including skills and attitudes) in a particular context. For example, the ability to communicate effectively is a competency that may draw on an individual's knowledge of language, practical IT skills and attitudes towards those with whom he or she is communicating": OECD, The definition and selection of key competencies, executive summary (DeSeCo-project), 2005: http://www.oecd.org/dataoecd/47/61/35070367.pdf

[94] Markowitsch, Jörg, Luomi-Messerer, Karin, Development and interpretation of descriptors of the European Qualifications Framework, in: European journal of vocational training No 42/43 – 2007/3, 2008/1.

on how MS struggled with the concepts and terminology of the EQF and on how they mitigated the difficulties.

Box: Examples of language difficulties in using the EQF

PL: The translation of English terms into Polish was not easy, because for some English words no Polish translation existed. In Polish in some cases there is only one word where in the English language there are two distinct words. For instance, there is only one word for teaching and learning, knowledge and skills, and also for assessment and grading. Furthermore, the English word 'framework' does not have a Polish equivalence.

The problem with the translation of the English concepts into Polish is resolved in two ways. For some concepts a Polish equivalent is chosen, and its meaning in this context is described. For other concepts a new Polish word is constructed, mostly derived from the English word. For each concept - e.g. framework, non-formal learning, learning outcome - the meaning is broadly explained accompanied with synonyms in a half-Polish, half English report[95]. Stakeholders were involved in the development of the vocabulary, and its meaning is clear to everyone involved. Whether this will be an obstacle to stakeholders not involved in the process - individual teachers, employees or employers - is not clear at this stage, but not seen as a possible obstacle.

LT[96]: In Lithuania, own terminology is used to describe the qualifications in the national context. For the NQF, the learning outcomes of qualifications are described by specifically developed level descriptors which deviate from the EQF level descriptors. The level descriptors are defined according to two parameters – *characteristics of activities* and *types of competences*.

	Parameters	
	Characteristics of activities	Types of competences
Criteria	- complexity of activities	- functional competences
	- autonomy of activities	- cognitive competences
	- variability of activities	- general competences

The descriptors of the qualification levels distinguish between specific typical functional, cognitive, and general competences, and reflect the evolution of competences on the route from a lower to higher qualification.

Although using different concepts, still the links with the EQF level descriptors are clear. There is a stronger emphasis on skills (through the focus on activities), but cognitive and general competences are included in the Lithuanian NQF as well.

3.3.2. Transparent referencing: a common concern

Countries are free to organise their own referencing process and are free to choose the concepts they find most appropriate to describe their system. However, it is a common concern of the EQF AG to understand the links between national qualifications and the EQF. As the referencing process can be characterised by 'learning by doing', in dealing with the

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[95] Sławiński, S. (editor), Dębowski, H., Michałowicz, H., Urbanik, J. A glossary of key concepts related to the national qualifications system, 2011
[96] Description from: Cedefop, National qualifications frameworks development in Europe, 2011.

countries' referencing reports in the last year, the EQF AG developed procedures and guidelines. These procedures and guidelines for referencing are developed on the basis of experiences from countries having finalised their referencing process. A first version of this so-called Note 3[97] was published in March 2011 on the basis of the experience of four countries. Currently, an updated version is being prepared, taking into account the experiences from ten countries completing their referencing process.

The way countries deal with their own referencing process and the way the EQF AG is involved in this, has been subject to a learning process. Now that ten countries have completed their referencing process, presented their reports at the EQF AG, a general pattern is emerging for managing the referencing process[98]:

- After setting up of the bodies to conduct the referencing a proposal for the level-to level linkages is made.

- National consultation on the basis of the proposal is made.

- A referencing report is written that takes into account the national consultation and the views of international experts.

- The report is presented to the EQF AG and a discussion follows.

- If relevant, clarifications and further evidence is provided.

- If changes in the NQF and relationship between the NQF and the EQF occur, the report is updated and the EQF AG informed.

When a country presents its referencing report at a meeting of the EQF AG, at least three members of the EQF AG volunteer to examine the referencing report with scrutiny (in fact all members are invited to do the same). After this, all comments, made before the presentation of the country referencing report and at the EQF AG meeting, together with the replies the country provides, are drawn up in a country note. This note is communicated to the country. The country is invited to take into consideration the comments made in finalising their referencing report.

The ten criteria to guide the referencing process (see text box below) are endorsed by the EQF AG with the aim to provide the best conditions for mutual trust. The criteria have proven to be a useful way to structure the referencing reports and have become a core of these reports[99].

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[97] See: http://ec.europa.eu/eqf/documentation_en.htm
[98] See: European Commission, Referencing national qualifications levels to the EQF European Qualifications Framework Series, Note 3, 2nd edition, 2012 (forthcoming).
[99] See: European Commission, Referencing national qualifications levels to the EQF European Qualifications Framework Series, Note 3, 2nd edition, 2012 (forthcoming).

Box: Criteria and procedures for referencing national qualifications levels to the EQF

Criteria and procedures for referencing national qualifications levels to the EQF

1. The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process, including the National Coordination Point, are clearly determined and published by the competent public authorities.
2. There is a clear and demonstrable link between the qualifications levels in the national qualifications framework or system and the level descriptors of the European Qualifications Framework.
3. The national qualifications framework or system and its qualifications are based on the principle and objective of learning outcomes and linked to arrangements for validation of non-formal and informal learning and, where these exist, to credit systems.
4. The procedures for inclusion of qualifications in the national qualifications framework or for describing the place of qualifications in the national qualification system are transparent.
5. The national quality assurance system(s) for education and training refer(s) to the national qualifications framework or system and are consistent with the relevant European principles and guidelines (as indicated in annex 3 of the Recommendation).
6. The referencing process shall include the stated agreement of the relevant quality assurance bodies.
7. The referencing process shall involve international experts.
8. The competent national body or bodies shall certify the referencing of the national qualifications framework or system with the EQF. One comprehensive report, setting out the referencing and the evidence supporting it shall be published by the competent national bodies, including the National Coordination Point, and shall address separately each of the criteria.
9. The official EQF platform shall maintain a public listing of MS that have confirmed that they have completed the referencing process, including links to completed referencing reports.
10. Following the referencing process, and in line with the timelines set in the Recommendation, all new qualification certificates, diplomas and Europass documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate European Qualifications Framework level.

Source: Website of the EQF: http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/criteria_en.pdf

In relation to a number of criteria, countries encounter difficulties. These difficulties will be elaborated on below[100].

Criterion 2: Clear and demonstrable link between level descriptors at national and European level

It is essential that links between level descriptors at national level and EU level (EQF level descriptors) are clear and demonstrable. Procedures for linking levels to each other should be robust and transparent, taking into account the 'best-fit' principle that is finding the best match between the two sets of descriptors, although it may not be a full match. Usually, NQF descriptors are more detailed than those of the EQF and they are normally closely linked to the specific national qualifications system. Therefore, it is unlikely that there will ever be a perfect match to the EQF level descriptors and some approximation is necessary.

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[100] Developments and progress with regard to a number of criteria is discussed predominantly in the Section on Institutionalisation. Criterion 10 will be discussed in Section 3.5.3.

However, as has been indicated, each NQF reflects national education cultures and traditions. They are attuned to national qualifications systems and build upon consensus between national stakeholders. Hence, also the referencing to the EQF is the result of cultural, social and political developments rather than analytical analysis. Providing evidence of a clear and demonstrable link can therefore be seen as rationalising political discussions. In addition, when countries use a different terminology, *establishing a link* might not be problematic, but *providing evidence* (linguistic analysis) might prove to be challenging.

Finally, the perception of what is considered to be sufficient evidence of links among sets of descriptors changes, as national experts and the EQF Advisory Group are developing expertise in this matter[101]. Hence, the latest reports are examined with more scrutiny on this matter than the earlier reports. This 'learning by doing' might hence require that countries that have already finalised their referencing report, should review it to see whether, according to current quality standards of referencing reports, the established links are still clear and sufficiently demonstrable. Here below one particular pressing issue concerning referencing a qualification to an EQF level is discussed.

School leaving certificate (EQF level 4-5)

Concerning the referencing of particular qualifications to certain EQF levels, in some countries debates took and are still taking place that have international impact. One particular example is the positioning of the school leaving certificate giving access to higher education. In most European countries this qualification is referenced at EQF level 4[102]. In some countries, such as the Netherlands, Germany and Austria, arguments are provided to place it at level 5. Having this certificate at different levels creates a serious hampering effect on mobility. According to the Lisbon Recognition Convention (LRC), a qualification which gives access rights to higher education in the home country should give access to higher education in another country that is signatory of the LRC. As a consequence, when qualifications are located at different levels, but entail the same rights, this creates a disadvantage in the context of mobility. For instance, if in Germany the certificate is located at level 5 and in Poland at level 4, would a student, having attained a Polish level 4 diploma and willing to access German higher education, need to follow an update course at level 5 before entering the German higher education programmes? In the box below the German situation and debates concerning the school leaving certificate is presented.

Box: Presentation of the German discussions on school leaving certificate EQF level 4 or 5

> **DE**: A major issue currently deadlocking the referencing and implementation process is caused by differences concerning the referencing of the *Abitur*. The main players in this debate are the social partners on the one hand, arguing the *Abitur* should be referenced at level 4, and the *Kultusministerkonferenz* (KMK) on the other, claiming the *Abitur* belongs at level 5. The situation recently escalated, when a letter in which the social partners proclaimed their withdrawal from all involvement in the framework if the *Abitur* would be referenced to level 5 instead of level 4, was published by the German press. In this letter, the social partners announced to stop their activities regarding the implementation of the framework until the issue is resolved. The KMK in reaction also dug in its heels and strongly insisted on referencing the *Abitur* to level 5.

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[101] Information provided by the European Commission
[102] According to a survey amongst the members of the EQF AG, organised by the European Commission prior to the Peer Learning Activity on the school leaving qualifications, giving access to higher education, organised 20-21 September 2011 in Tallinn, most countries place the school leaving certificate at level 4. In NL, AT and DE the qualification might be positioned at level 5.

Both parties do not seem inclined to make the first move, and until the issue is resolved, no further action on the referencing process will be conducted. As a result, the implementation process has de facto come to a halt.

Although seemingly a highly technical discussion, the issue masks an underlying, more fundamental debate on the desired scope and goals of the framework. A lack of consensus regarding the extent to which the DQR should be used to alter the existing outlook and organisation of the German education system – i.e. the relation between VET and general education and HE – is at the heart of this discussion. The main issue at stake here is the alleged equivalence between VET on the one hand, and general education and HE on the other hand.

Illustratively, the reason the social partners strongly oppose putting the *Abitur* on level 5, is that the framework, rather than working for the equivalence of VET and general education, would hereby confirm the often existing view of higher-levelled initial general qualifications and lower-levelled initial vocational qualifications. As initial VET-qualifications are referenced to levels 3 and 4, putting the *Abitur* on level 5 would contribute to the false perception that the *Abitur* – and in effect the pathway of general and academic education – is higher than and therefore preferable to the vocational route. This would undermine the idea of the DQR as a means to promote VET as an attractive and valuable alternative to general education and HE. It might even undermine the relative value of vocational qualifications. The KMK on the other hand argues that the *Abitur* indeed is very high-levelled in terms of knowledge and skills, and that referencing it to level 4 – thereby putting it on a par with most vocational qualifications – would not justify and might even undermine the value of the *Abitur.* Furthermore, the DQR should clarify the logical and most direct learning routes and pathways to learners. As the *Abitur* gives access to university bachelor programs at level 6, it is only logical to reference its precedent to level 5.

A compromise offered by the KMK to split up VET-qualifications into three different levels (i.e. levels 3, 4 and 5), thereby clearing the way for certain VET-qualifications to be referenced to the same level as the *Abitur,* was turned down by the social partners. It was feared this would result in the fragmentation and individualisation of qualifications,[103] and that this solution would prove to be a mere theoretical formality. The bulk of the initial vocational qualifications would still be concentrated on the lower levels of the framework, so the opening up of level 5 to initial vocational qualifications would in practice bring no substantial improvement.

All stakeholders stress the seriousness of the current impasse[104]. There seems to be no easy way out. Besides, even if the issue concerning the *Abitur* would be resolved, it is not unlikely that similar debates on the referencing of other qualifications will emerge, especially when it comes to referencing the higher vocational qualifications to the top-levels of the framework. Several stakeholders indicate the underlying issue concerning the relative status of VET in the German qualifications system and the desired permeability of the system should be resolved first, in order for the implementation process to pick up the previous pace. Otherwise, the DQR, rather than working for transparency, might result in confusion by mixing different spaces of recognition and blurring the distinction between different types of knowledge.[105]

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[103] Cedefop, National qualifications frameworks development in Europe, 2011.
[104] See for instance: Anlage zur BIBB-Pressemitteilung Nr. 50/2011 vom 01.12.2011, Stellungnahme des Hauptausschusses des Bundesinstituts für Berufsbildung (BIBB) Bewertung des Beschlusses der Kultusministerkonferenz (KMK) zum Deutschen Qualifikationsrahmen (DQR); and Alexandra Straush, Streit um das Stufenmodell, in: Zeitung-Financial Times Deutschland, December 2011.
[105] Cedefop, National qualifications frameworks development in Europe, 2011.

The example shows that determining the 'best-fit' is a multi-dimensional issue taking into account national systems, traditions, reforms, stakeholders' views, technical issues, labour market dynamics and also international perspectives. That this only recently (in 2011), led to difficulties in the NL, AT and DE concerning the school leaving certificate, can only be seen as an illustration that referencing is not only a technical issue but that it does have an impact on education systems in a country. It is therefore likely that more of these kinds of debates will occur when more countries are finalising their referencing reports.

Criterion 3: **Principle of learning outcomes underlie qualifications and frameworks (also link with validation of non-formal and informal learning is established)**

As has been discussed, the learning outcome approach is the basis principle behind the EQF project. The EQF does not take into account the learning pathway (input variables such as duration and institute), but is build upon the outcomes of learning regardless of how individuals obtained knowledge, skills and competences. Only by means of describing qualifications in terms of learning outcomes, qualifications offered in different education sectors and countries can be compared and routes for progression can be identified.

Although countries are advancing in developing NQFs and defining level descriptors for their national levels of qualifications, the definition of qualifications in terms of learning outcomes still remains a relatively new phenomenon and it is still a challenging exercise. The EQF AG provides support and develops guidelines to facilitate this process[106].

Especially challenging in many countries is the opening up of the higher level qualifications to other types of qualifications than those offered by higher education institutes, involved in the Bologna process. For instance, in the Netherlands, there have been discussions concerning referencing advanced VET (in Dutch: Middelbaar Beroepsonderwijs niveau 4: MBO4) to EQF level 5, which is 'reserved' for the short cycle degree (Associate Degree). Also in Austria higher vocational education was provided the opportunity to reference to the higher levels in the EQF by means of the 'Y-rule': splitting up the Austrian NQF in an academic and vocational route for levels higher than EQF level 5.

Related to the introduction of the learning outcome approach is the necessity for the establishment of validation procedures for non-formal and informal learning. Since the learning outcomes are independent from the learning pathway, learners need to have the possibility to have their competences assessed to receive a partial qualification. Concerning validation policies, three groups of countries can be identified[107]:

- **High degree of implementation**: Validation has moved from the level of general policy statements to tangible practices. Countries like Belgium, Denmark, Estonia, Finland, France, Ireland, Netherlands, Norway, Portugal, Slovenia, Romania, Spain and the UK belong in this category. For instance, according to the Danish regulations adults have the right to ask an educational institution to assess their prior learning in order to obtain recognition of their competencies in the adult and continuing education system[108].

- **Medium level of development**: Practices making it possible for individual citizens to have their learning outcomes identified and/or validated on a systematic basis still need to be put in place (as of December 2007). Most are establishing

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[106] See: European Commission, Cedefop, Using learning outcomes, European Qualifications Framework Series: Note 4, 2011.

[107] As of December 2007: see: Cedefop, Validation of non-formal and informal learning in Europe; A snapshot 2007, 2008. http://www.cedefop.europa.eu/EN/Files/4073_en.pdf

[108] See: Danish Ministry of Education, Department of Adult Vocational Training Education, National actions for promoting recognition of prior learning, 2008.

approaches to make this possible. The level of activity varies considerably in this group. Countries like Austria, the Czech Republic, Iceland, Italy, Germany, Hungary, Lithuania, Luxembourg, Malta, Poland and Sweden can be said to belong in this category.

- **Low level of activity**: According to the European inventory 2007, countries in this group frequently describe validation as a new theme and something yet to influence the overall education, training and employment agenda. In some countries validation is a controversial theme, sometimes triggering resistance from national stakeholders, including in education and training. This group includes countries like Bulgaria, Croatia, Cyprus, Greece, Latvia, Liechtenstein, the Slovak republic and Turkey.

It can be concluded that the learning outcome approach and the validation procedures are being implemented throughout Europe, but that, especially with regard to validation, increased emphasis is needed to maintain the pace. The EQF can only be fully effective in terms of stimulating mobility and lifelong learning when learning outcomes of alternative learning pathways are validated, increasing mobility between different education sectors and learning situations. It is expected that the upcoming Council conclusions on validation will provide a new impetus for this process[109].

Criterion 4: Procedures for inclusion and positioning of qualifications in national framework or system are in place

Linking national level descriptors to the EQF level descriptors is one thing; it is another to position national qualifications in a national framework or system. This next step finally brings the EQF to the end-users: citizens and employers. To ensure that qualifications are positioned correctly, procedures need to be in place. Also here, the principle of 'best-fit' is applicable.

In general, qualifications awarded by the formal education sector can be easily linked to the levels of the EQF and for these qualifications the criteria are often clear. For qualifications awarded outside the formal education sector, for instance, company, sectoral or international qualifications, the criteria and procedures are often not so obvious. In the Netherlands, procedures for positional qualifications awarded outside of the formal education sector are developed. The procedures include the requirement that learning programmes need to maintain a threshold of 400 hours of learning effort before they are allowed to be referenced to the Dutch NQF[110]. Also, non-formal and private providers need to pay a fee for getting referenced. In Scotland, the SCQF now explicitly aims at encouraging the non-mainstream sections of the Scottish education and training system to bring their programs into the framework. As a result, the SCQF now includes programs offered by individual employers, the fire service and the health service. A promising initiative in this respect is the effort to give case-study examples of how the framework could be used by individual employers to include their training programs. The SCQF is trying to identify tangible examples of how to reference employer-based training programs to the framework. The idea is to clarify, via specific sector-based examples, how employers could reference their own internal training programs to the SCQF.

Recently, the issue of international qualifications received attention within the work of the EQF AG, as Ireland was been dealing with this particular issue[111]. The issue with

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[109] Under the Danish Presidency a Council Conclusion is being prepared on validation of non-formal and informal learning (expected spring 2012).

[110] Commissie NLQF – EQF, Advies Commissie NLQF - EQF. Introductie van het Nederlands Nationaal Kwalificatiekader NLQF in nationaal en Europees perspectief. Bijlage VII, 2011.

[111] see http://www.nqai.ie/documents/AlignmentofIntSectoralAwards060910withtheNFQPolicyApproach-FINAL_3_.pdf

international qualification is that it does not make sense to reference an internationally awarded certificate to NQFs in 27 MS. Also, international qualifications should be referenced at the same EQF level in order to avoid confusion. Furthermore, quality assurance of the providers awarding the international qualifications needs to be in place before these qualifications can be referenced to national frameworks and the EQF. Hence, in respecting the principle of subsidiarity, the issue of international qualifications calls for coordinated actions to align national qualifications systems and quality assurance systems. For this reason, the European Commission is planning to prepare a Peer Learning Activity on this issue early in 2012.

The work on the criterion to establish procedures for inclusion and positioning of qualifications in national frameworks or systems is essential in relation to the second stage of referencing; i.e. putting an EQF-tag on each new qualification and Europass certificate. Hence, when establishing procedures and criteria does not receive the appropriate attention it deserves, the second stage will be seriously delayed.

Criterion 5: The national quality assurance system(s) for education and training refer(s) to the national qualifications framework or system

The 2008 Recommendation emphasised the importance of promoting and applying the principles of quality assurance in education and training. Trustworthy qualifications depend on the quality assurance mechanisms applied; hence having in place quality assurance mechanisms which take into account the principles of the EQF (i.e. learning outcome approach) is essential. These quality assurance systems need to guarantee that expected learning outcomes are met when a qualification is awarded. Traditionally, many quality assurance systems were input based, taking into account the duration of a programme, provider, teachers' qualifications, and learning methods.

European international initiatives in the field of quality assurance (ESG and EQAVET[112]) have been initiated, promoting the learning outcome approach and the involvement of employers in quality assurance. Although these initiatives and processes directed at outcomes are progressively being introduced[113] in quality assurance, it still seems that countries are finding it difficult to implement a learning outcome approach in their quality assurance systems and in their assessment procedures. In Italy for instance, more emphasis needs to be put on aligning regional quality assurance systems in VET. Each region has its own assessment procedure and there is not sufficient knowledge at national level about the processes at regional level. In Sweden on the other hand, the extent to which the learning outcomes perspective is influencing assessment practices poses a challenge. Professionals may have problems seeing that assessment methods and criteria have to relate directly to the required learning outcomes. This is an ongoing process illustrating the long term challenge involved in the shift to learning outcomes[114]. However, as the learning outcomes approach is not a vital issue in the implementation process, stakeholders do not expect the NQF to make a significant contribution to this process.

Mutual trust in each others qualifications can only fully be established when the quality of the awarded qualifications is acknowledged. Therefore, firstly, at European level, the link between the EQF and European quality assurance tools needs to be strengthened.

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[112] See: ENQA, Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2009; European Quality Assurance Reference Framework for VET. Summary: http://europa.eu/legislation_summaries/education_training_youth/lifelong_learning/c11108_en.htm

[113] For a discussion of different approaches to ensure the quality of certification processes in a sample of nine European countries see: Cedefop, The relationship between quality assurance and VET certification in EU Member States, 2009: http://www.cedefop.europa.eu/EN/Files/5196_en.pdf

[114] Cedefop, Development of national qualifications frameworks in Europe, 2011.

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Secondly, at national level, the links between NQFs and quality assurance systems need to be discussed more intensely.

3.3.3. To conclude

Although the common concern can be easily identified at organisations and institutions closely related to the EQF project at EU and MS level, it remains questionable whether this common concern can also be found in organisations and stakeholders to which the EQF and subsequently an NQF applies, but who are less involved. For instance, education providers will need to implement learning outcomes approaches in describing their qualifications and curricula; they need to develop procedures to assess whether someone has the required learning outcomes; they need to implement quality assurance procedures linked with learning outcomes approaches. Furthermore, citizens and employers are not very aware of the current developments and often do not immediately see the benefits for themselves. Despite globalisation and increased labour and learning mobility, still a large proportion of citizens find a job nearby where they live and employers still recruit employees from local and regional education institutions.

The lack of common concern at 'ground level' poses a threat to the actual implementation of the EQF. It remains questionable whether this common concern will grow at this level when the implementation continues towards a more advanced level.

In addition, the issue of language and terminology raises the question about the foundation of the EQF: the EQF appears very much a political-pragmatic tool and not a scientific-empirical tool[115]. This is true both at European level and at MS level. As the ILO puts it within a broader framework: "these definitions are not empirically derived, but describe what people hope qualifications frameworks should be and should do. To make matters more complicated, although the terminology used in creating and describing qualifications frameworks is very similar in different countries—including terms such as 'learning outcomes', 'competence', 'standards', 'validation', and even, 'qualification'—in fact, these terms often refer to very different things."[116] From this viewpoint it can be argued that the implementation of the EQF is a technical process, but even more a *political process* concerned more with finding consensus rather than an empirical grounding.

The common concern is fostered by means of the agreed criteria for referencing. These ten criteria are welcomed by the MS as a basis for their referencing report. With regard to a number of criteria, MS face serious difficulties, predominantly having to do with bringing the EQF to its final beneficiaries: still major work needs to be conducted before national qualifications, certificates and Europass documents contain an indication of the EQF level (e.g. setting up procedures for positioning, implementing the learning outcome approach, using the learning outcome approach in quality assurance.

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[115] See: Markowitsch, Jörg, Luomi-Messerer, Karin, Development and interpretation of descriptors of the European Qualifications Framework, in: European journal of vocational training No 42/43 – 2007/3, 2008/1, ILO, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, 2010.

[116] ILO, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, 2010.

3.4. Level of institutionalisation[117]

In this section the focus will be firstly on the institutionalisation at EU level and secondly on the institutional embedding of the EQF implementation at MS level.

3.4.1. Institutionalisation at EU level

At EU level, the OMC is treaty-based by means of the 2008 Recommendation. By this Recommendation, that lasts until 23 April 2013, the European Commission has the competence to work on this subject. Before 23 April 2013 the Commission should report to the European Parliament and to the Council on the experience gained and implications for the future, including, if necessary, the possible review and revision of the Recommendation[118].

The roles of European institutions, centres and agencies such as the European Commission, Cedefop and ETF are clearly defined. The Commission takes the role of coordinator of the process and Cedefop and ETF provide analytical support, whereas the focus of ETF is on the external dimension of framework development. The input at EU level in terms of human resources is rather modest. Within the Commission two persons are closely involved in the EQF implementation, within Cedefop two to three persons work on monitoring progress and providing analytical input on the implementation. Furthermore, the work (analysis, drafting of key documents and organising events) is supported by external consultants by means of Framework Contract services[119] and external study assignments.

The European Commission hosts the EQF AG meetings, provides the agenda and accompanying documents (through the EQF Implementation e-Community[120]). In addition, sub-groups are established consisting of members of the EQF AG and other stakeholders on particular themes (referencing, quality assurance, international qualifications, learning outcomes, synergies between different European frameworks).

The EQF AG is composed of representatives of all EU MS (EU27) and other EEA countries (NO), candidate countries (HR, IS, TR), the Council of Europe (mandated to represent the QF-EHEA), European social partners (BusinessEurope, - European Centre of Employers and Enterprises Providing Public services (CEEP), European Trade Union Congress (ETUC), European Association of Craft, Small and Medium-sized Enterprises (UEAPME), and further European stakeholders involved in awarding formal qualifications and with a clearly recognised representation at European level; the European University Association (EUA), European Civil Society Platform on Lifelong Learning (EUCIS-LLL)[121], Eurochambres and the European Network of the Heads of Public Employment Services (PES). The EQF AG is chaired by the European Commission. Cedefop and ETF provide technical support to the EQF AG, closely coordinated with DG EAC. The work of the group consists in exchanging ideas, providing updates about the referencing process and discussing national referencing reports. The members of the EQF AG meet regularly. Due to the heavy workload on

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[117] One of the conditions of successful implementation of the OMC is a high level of institutionalisation. This means that an organisational structure exists where people continuously work on the coordination and improvement of a specific sector. Someone has to take on the role of coordinator in order to coordinate a large scale cooperation process such as the OMC. As the European Commission only has limited competences a certain treaty base must exist which allows the European Commission to exert some influence. Also at the national level there needs to be a clear organisational structure coordinated by a particular party. Someone has to take the lead in order to get the subject on everyone's agenda and to create a platform for discussion.

[118] OJ C 111/1 Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), 6.5.2008.

[119] Consultants from GHK and 3s support the European Commission in relation to the EQF.

[120] http://europa.eu/sinapse/directaccess/qualification_framework (accessible only for members).

[121] The European Civil Society Platform on Lifelong Learning (EUCIS-LLL) gathers 24 European networks working in education and training.

assessing national referencing reports, more meetings were organised in the last year (2011) and the current year (2012)[122].

There is close cooperation between the EQF AG, the European Commission, Cedefop and the Council of Europe on the alignment of the EQF and the QF EHEA. During the EQF AG meetings also other European instruments are discussed in their relation with the EQF, such as the directive on the recognition of professional qualifications[123], the Europass framework[124], the European Classification of Skills, Competences, Qualifications and Occupations (ESCO) and European quality assurance[125] and credit transfer arrangements[126]. With other DGs there is cooperation, but this could be strengthened (e.g. concerning the Professional Qualifications Directive 2005/36 (DG MARKT) and ESCO (DG EMPL/EAC).

As has been indicated, in the referencing process, MS are invited to involve two or three international experts. The role these external peers have is advising national authorities on the most clear and readable presentation of the results of the referencing in their report. As ten countries nearly finalised their referencing, the international experts involved so far have included EQF Advisory Group members and NCP staff, as well as other policy makers or practitioners involved in the development of comprehensive lifelong learning or higher education frameworks in Europe and beyond, and experts in quality assurance or recognition of qualifications[127]. Usually, experts are invited coming from neighbouring countries, countries which are comparable in size and from countries that have already finalised their referencing report. It is not always clear what the influence and impact is of the involvement of experts. Therefore it was already advised that the expert opinion on the referencing process and what has been done with the comments made should be presented more clearly in the referencing report.

The European Commission and Cedefop, supervised by the EQF AG, published a number of documents to support the implementation process in practical terms. First, a newsletter was developed (appearing in April, July and October 2010 and August 2011[128]), second, four notes were published on:

1. Explaining the European Qualifications Framework for Lifelong Learning (brochure);
2. Added value of National Qualifications Frameworks in implementing the EQF;
3. Referencing National Qualifications Levels to the EQF and;
4. Using Learning Outcomes[129].

These notes are regularly updated to include examples and experiences from the MS (e.g. the note on referencing). In addition to these publications, an online portal is established and a database for qualifications is being developed, tested and implemented where end-users (citizens, employers) can compare national qualifications frameworks and (in the future) search for qualifications. This data base will be a user friendly tool available in all

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[122] In 2008 and 2009, the EQF AG met twice, in 2010 three meetings were organised and in 2011 six meetings are held. For 2012 a similar number of meetings is planned to be organised.

[123] OJ L 255/22, Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, 2005: http://ec.europa.eu/internal_market/qualifications/regprof/index.cfm?fuseaction=directive.home.

[124] See: http://europass.cedefop.europa.eu/

[125] European Quality Assurance in Vocational Education and Training: http://www.eqavet.eu/gns/home.aspx and European Standards and Guidelines: www.enqa.eu/.

[126] European Credit System for Vocational Education and Training (ECVET) http://ec.europa.eu/education/lifelong-learning-policy/doc50_en.htm and European Credit Transfer and Accumulation System (ECTS) http://ec.europa.eu/education/lifelong-learning-policy/doc48_en.htm

[127] Information provided by the European Commission.

[128] See: http://ec.europa.eu/eqf/newsletter_en.htm

[129] See: http://ec.europa.eu/eqf/documentation_en.htm

languages. It is currently not yet known when the portal will be fully operational[130]. In the future, the EQF data base will be linked with the existing PLOTEUS portal on learning opportunities[131].

3.4.2. Institutionalisation at MS level

At MS level a wide variety exists on how the implementation of the EQF and, as is in most countries the case, the development of an NQF is embedded institutionally.

The implementation of the EQF and the referencing of national qualifications to the EQF (whether or not it is through establishing an NQF) is in most countries the responsibility of the Ministry of Education (such as in AT, BE, FI, BG, CY, CZ, EE, DE, EL, LV, LT, LU, MT, NL, SK, SI, ES). In the federal organised MS, such as Austria, Germany, Italy and the UK, regional governments (Ministries of education or Ministries of social affairs in case of VET) are involved as well. In other countries, a broad group of Ministries and stakeholders are involved in the implementation of a national framework (e.g. DK, FI, FR, HU IE, IT, PL, PT, RO). In some countries, a separate committee is established / designated to coordinate work on qualifications, for instance in France and Romania.

The 2008 Recommendation called upon the MS to designate a national coordination point for the implementation of the EQF. Depending on the approach chosen, the positioning of the NCP differs across countries. In some MS the NCP[132] is positioned within the Ministry of Education (For instance: CY, FI, HU (the Department for International Relations in the Education in the Ministry of National Resources), SK, ES). In other countries the NCP is put more at distance of the Ministry, for instance within the Qualifications authority (e.g. UK, IE, MT, PT), the organisation for international cooperation (e.g. AT), within a research institute (e.g. IT) or ERIC-NARIC point (e.g. LV, PL). In the Netherlands until very recently the positioning of the NCP was discussed. The outcome of the discussion is that the NCP should be independent from both the Ministry and the education sectors. Each country designates one person as representative of the country at the EQF AG. Often these persons are related to the NCP, or related to the responsible national Ministry.

Box: **Examples from the two groups concerning institutional embedding of the implementation**

> **IT**: The referencing of the Italian qualifications to the eight levels of the EQF is considered first of all a technical procedure and it is treated as a research project; mapping and analysing qualifications and referencing them to the EQF. For this reason the research institute ISFOL (the Italian Institute for the Development of Vocational Training for Workers) has been designated the national coordination point (NCP) by the Ministry of Labour and the Ministry of Education.
>
> **NL**: The task of referencing of qualifications will be conducted by the newly established NCP. It was decided to establish this NCP outside the Ministry and independent from the sectors. In the beginning of 2012 the NCP was established. A director has been found and experts have been appointed[133]. The necessary procedures are tested and finally, the quality assurance and referencing guidelines of non-formal education are being formulated.

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[130] See : http://ec.europa.eu/eqf/search_en.htm
[131] http://ec.europa.eu/ploteus/home.jsp?language=en
[132] Since 2010 NCPs have the opportunity to request financial support from the EU's lifelong learning programme. Grants have been used mainly for communication purposes and for supporting the referencing process (studies, expert consultations etc.), information provided by the European Commission.
[133] See: http://www.nlqf.nl/

AT: The Austrian NCP was set up as an organisational entity at OeAD (Österreichischer Austauschdienst, the Austrian agency for international cooperation in education and research). The aim of the NCP is to develop the translation device for all qualifications systems in Austria, to coordinate the implementation of the learning outcome approach and finally to ensure the quality and transparency of the link between the Austria QF and the EQF[134].

SE: The national agency for higher vocational education (Myndigheten för yrkeshögskolan, YH) has been given the mandate to coordinate the development of the Swedish qualifications framework and is also functioning as the NCP[135].

3.4.3. Cooperation and alignment of the EQF and the QF EHEA

Each of the three cycles within the QF EHEA (Bachelor, Master and PhD) are described in terms of learning outcomes along the so-called Dublin descriptors. Currently, 47 European countries committed themselves to work on making their national higher education qualifications compatible to the overarching framework by 2012 (by means of self-certification). The level descriptors of level 6 to 8 of the EQF are compatible with the level descriptors of the three cycles included in the Bologna process. As has been indicated, there is close cooperation between the EQF AG and the Council of Europe on the alignment of the EQF and the QF EHEA and also at national level the NCPs are encouraged to cooperate with the coordination points for the QF EHEA. Since 2010 joint meetings are organised with the two networks.

Despite the similarities between the two frameworks, there is a clear distinction between the two. Although not mentioned explicitly in the official declarations, in Bologna circles the word harmonisation is frequently used[136]. The three-cycle structure changed the higher education landscape in the 47 involved countries. The EQF has no hidden agenda on harmonisation, but is 'merely' a translation device to make relationships between qualifications and different systems clearer. This does not mean however, that the EQF implementation could not lead to a convergence of systems.

The criteria for referencing (EQF) and self-certification (QF EHEA) are similar and MS are encouraged to integrate both the referencing report for the EQF and the self-certification report for the QF EHEA. In 2009, Malta presented a joint report for referencing their NQF to the EQF and verifying the compatibility of their higher education framework with the QF-EHEA. Several countries are now considering applying the same approach.

Although at European level the cooperation between the two overarching frameworks runs smoothly, at MS level difficulties appear in aligning the EQF and QF EHEA. The most pressing issue is how the Dublin Descriptors are used in the NQFs. A related issue is whether or not to open up other qualifications than the Bachelor, Master and PhD qualifications at EQF level 6, 7 and 8. The box below provides examples on the relationship of the EQF and the QF EHEA in several countries.

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[134] See: http://www.lebenslanges-lernen.at/home/nationalagentur_lebenslanges_lernen/nqr_koordinierungsstelle/ (accessed: 02-01-2012).
[135] See: Cedefop, Development of national qualifications frameworks in Europe, 2011.
[136] ETF, Transnational qualifications frameworks, 2010.

Box: Examples of relationship between EQF and QF EHEA

SE: The main debate is about the opening up of levels 6, 7 and 8 to non-academic qualifications. A broad consultation of stakeholders exposed differences in opinion between the academic sector and other stakeholders involved in developing the NQF. The majority of universities and academic institutions are in favour of restricting levels 6, 7 and 8 to qualifications covered by the Bologna process. Universities seem to fear that the creation of an open and comprehensive NQF may come to threaten the overall quality and status of Swedish higher education. The majority of public authorities, social partners and regional bodies are, however, in favour of opening these levels to all types of qualifications. The main employer organisation takes this even further by stating that the overall legitimacy of the framework would be lost if levels 6, 7 and 8 were to be reserved for the university-sector.[137] As a consequence, both unions and employer organisations indicated they would lose their interest in and commitment to the framework if certain levels would by definition be closed off to non-academic qualifications.

A report summarising the feedback from the consultation was presented to the Government in June 2011, and recommends all levels to be kept open to all types of qualifications. The report acknowledges - in line with the comments from several universities - that opening up levels 6, 7 and 8 will require robust and visible quality assurance mechanisms, making sure that the overall level of Swedish higher education is not negatively affected. It will be up to the government to decide on a final solution, reflecting the divergent opinions expressed through the consultation.[138]

Regardless of the outcome, the discussion on the opening up of levels 6-8 to non-academic qualifications did contribute to raising interest in the proposal.[139]

IT: There are no conflicts with other frameworks. The EQF level 6-8 are solely for the academic qualifications which have already been described in terms of learning outcomes under influence of the Bologna process. There are no VET qualifications at these levels and hence there is no conflict between HE and VET. The Italian approach is focused on formal qualifications. Hence, from this perspective there is no conflict. However, the implementation does not really pave the way for lifelong learning as it does not take into account non-formal and informal learning. When establishing an Italian NQF in debates with the non-formal and private sector conflicts could emerge at the surface.

DE: The DQR is compatible with the German QF EHEA (HQR). The level descriptors of levels 6, 7 and 8 of the DQR explicitly refer to the HQR, as far as academic qualifications are concerned.

Consequently, the HQR, rather than the DQR, is likely to remain the main frame of reference for HE. Its descriptors are more detailed than the descriptors in the proposed DQR and it is designed to suit the specific needs of HE.[140] It remains to be seen how the simultaneous implementation and use of these two, potentially competing, qualifications frameworks will affect the commitment to and impact of the DQR and, ultimately, the EQF. A potential drawback could be the emergence of two separate qualifications frameworks. If one of these frameworks would be perceived to be more credible than the other, this could undermine the position and credibility of the other system.

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[137] Cedefop, National qualifications frameworks development in Europe, 2011.
[138] Cedefop, National qualifications frameworks development in Europe, 2011.
[139] Cedefop, National qualifications frameworks development in Europe, 2011.
[140] Cedefop, National qualifications frameworks development in Europe, 2011.

In countries where there are no conflicts between the two overarching frameworks, it is usually the case that the higher levels are not open to other qualifications than the QF EHEA qualifications. This raises doubts about the permeability of the qualifications systems and the mobility between sectors (especially between VET and HE). Although qualifications frameworks are attuned to national traditions, cultures and systems, it should be a priority to diminish the amount of dead-ends in the system; i.e. that vocational education cannot be awarded with a qualification higher than level 5.

3.4.4. To conclude

Education policy is not the competence of the European Commission but that of the MS. For this reason, the EQF could not have been imposed to the MS by means of a Directive[141]. The MS can therefore voluntary decide to follow up on the recommendation to implement an EQF for lifelong learning[142]. The implementation at MS level is however supported by the European Commission and other European institutions such as Cedefop and the ETF. The European Commission has the role of facilitating the process through providing documentation, guidelines, advice and feedback. Cedefop provides more of a monitoring task and draws up a progress report on NQFs every year. ETF reviews the implementation of the EQF from the perspective of the wider world. An EQF advisory group has been established to monitor the transparency and coherence of the implementation of the EQF.

One could conclude that the institutionalisation within the OMC process of implementing the EQF is well established. In general, especially at EU level, roles and responsibilities are clearly defined, maintained and applied. At MS level, the roles and responsibilities are also clear, though there is a tendency that existing role divisions between groups of stakeholders are continued, although slight changes in structures, involving other stakeholders, are sometimes recommendable. For instance, in order to establish mutual ownership of the NQFs, the involvement of social partners (employers and employees) could be increased in the development phase of national qualifications frameworks. The whole implementation of the EQF and subsequently of the NQFs is still too much linked to education policy, instead of labour market policies. This is not only due to the lack of consultation and involvement moments, but also, in a number of countries, due to a lack of interest of employers in the EQF as such. Related to this, also the involvement of Ministries of Labour, both at MS and EU level, could be greater.

A particular issue at MS level is the overlap between the EQF and QF EHEA. In many countries there is hesitation from the university sector to work with the EQF since they feel that they already have their own framework. There is hence some hesitation to open up the EQF levels 6-8 for non-university qualifications. The treaty base for the implementation of the EQF will be finished by April 2013. After an evaluation, a proposal will have to be submitted on a new mandate to continue the work of the Commission and the support for the EQF AG.

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[141] See: OJ C 83/5 30.3.2010, Consolidated versions of the Treaty on European Union and the Treaty on the functioning of the European Union (2010/C 83/01), 2010: Article 165, 1: "The Union shall contribute to the development of quality education by encouraging cooperation between Member States and, if necessary, by supporting and supplementing their action, while fully respecting the responsibility of the Member States for the content of teaching and the organisation of education systems and their cultural and linguistic diversity."

[142] See: OJ C 111/1, 6.5.2008, Recommendations of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning, 2008/C 111/01, 2008.

3.5. Availability of objectives, benchmarks and indicators[143]

In the previous sections it was noted that there is a preparatory phase of development; a common concern and common language; and a generally high level of institutionalisation. In this section the use of objectives, targets, deadlines and benchmarks is examined.

3.5.1. Targets of the EQF and deadlines set

Besides common objectives (as described earlier on), specific targets have been set (referencing, putting an 'EQF-tag' on each certificate, implementing learning outcomes approach, designating a NCP). Finally, clear deadlines are set for the two-step implementation. The Recommendation of the European Parliament and of the Council of 23 April 2008 (2008/C 111/01) suggests that:

- the MS relate their national qualifications systems to the European Qualifications Framework **by 2010**[144], either by referencing, in a transparent manner, their qualification levels to the EQF levels, or, where appropriate, by developing national qualifications frameworks;
- **by 2012**, all new qualification certificates, diplomas and Europass documents contain a reference to the appropriate EQF level.

Concerning the accompanying measures (i.e. implementing the learning outcomes approach; validation procedures for non-formal and informal learning, quality assurance developed according to European common principles, designation of the NCP), no specific deadlines and targets have been set[145].

The European Commission has regular contact with all MS concerning the status of the progress towards the deadlines and during EQF AG meetings MS report on their stage of development, problems encountered and solutions found.

The process of the development of NQFs, the route most countries take to facilitate the referencing of qualifications to the EQF, is closely monitored by Cedefop. Cedefop publishes on a yearly basis reports on the development of NQFs[146]. In the following sections, the progress towards the two deadlines is discussed.

3.5.2. First step in referencing (Deadline 2010)

As of January 2012, 12 countries have presented their referencing report in the EQF AG meeting. For 2012, 19 countries foresee that they will present their reports (see table 1). Presenting the referencing report does not mean that the referencing process is finalised. It should be noted that it is the autonomous decision of a country to consider the report final, to send it to the Commission for uploading the report on the EQF portal. As of January 2012, the referencing reports of the following countries are presented at the EQF portal: IE, MT, FR and UK[147]. In addition, it should be noted that referencing is an ongoing process,

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[143] Another condition is the availability of objectives, benchmarks and indicators. Although this forms an official part of the OMC process, specific SMART formulated objectives are not always present. Consequently, it is often difficult to stimulate concrete actions and to measure results. Also, on the national level specific objectives are not always formulated. The question is if there are any measurable objectives, benchmarks or indicators available which give a clear direction to what a specific policy is supposed to achieve.

[144] See: ETF, Transnational qualifications frameworks, 2010: "Referencing of the 27 member state NQFs against the EQF has been prioritised, and most countries indicate that they plan to have completed the necessary processes by the end of 2011.

[145] Partially, these accompanying measures are subject to parallel policy developments. For instance a Council Conclusion is being prepared on validation; quality assurance is subject to ESG and EQAVET.

[146] Cedefop, The development of national qualifications frameworks in Europe (September 2009), 2009; Cedefop, The development of national qualifications frameworks in Europe (August 2010), 2010; Cedefop, National qualifications frameworks development in Europe, 2011.

[147] See website European Commission: http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm

which is never finalised as national qualifications, systems and frameworks are always in motion. Therefore, the reports need to be updated on a regular basis.

Table 1: Overview referencing national qualifications frameworks and systems to the EQF

Year	Number of countries	Countries (presented their referencing report)
Referenced by 2011 (1ˢᵗ January 2012)	**12** (11 MS and BE-vl)	BE-vl, DK, EE, FR, IE, LV, MT, NL, PT, UK, CZ and LT.
Referencing by 2012 (foreseen)	**19** (14 MS, BE-f, 2 EEA countries and 1 accession country (HR) and TK)	Quarter 1: LU, IT, AT, DE, HR, NO and RO.
		Quarter 2: FI, SE
		Quarter 3: -
		Quarter 4: BE-f, EL, ES, IS, CY, PL, HU, SK, SI and TK, BG

Source: Information provided by the European Commission[148]

To provide more information on the exact progress made by the countries, in the box below descriptions are provided on the state of play regarding the first step of referencing.

Box: Examples of the state of play with regard to the first step of referencing

SE: The first stage of the implementation is **ongoing**, pending the government decision on the proposed design, content and scope of the NQF. In preparing the proposal, the National Agency for Higher Vocational Education (Myndigheten för yrkeshögskolan, YH), coordinating the development of the framework, in cooperation with several experts and working groups, undertook three lines of action:

- Developing an open NQF (open in the sense that it should also be possible for qualifications outside the public sector to be included in the framework). In October 2010, the YH sent a proposal to the government for an open, 8-level framework. In order to safeguard international transparency, the national framework closely resembles the EQF, both in the structure, concepts and formulations used. Furthermore, the descriptors were carefully formulated to be acceptable for both the labour market (i.e. employers) and the realm of education (i.e. formal education institutions).
- Investigating the merits and disadvantages of opening up levels 6, 7 and 8 to non-academic qualifications. After stakeholder consultation and intense debate, it was proposed that these levels should be open to non-academic qualifications.
- Developing a model that makes it possible for qualifications outside the public domain to be included in the framework. A proposal outlining this model was sent to the government in September 2011.

It is now up to the government to assess and decide on the adoption of this threefold proposal. Furthermore, the government will have to make a decision regarding the legal status of the NQF, as well as the role, mandate and authority of the NCP.

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[148] Information provided by the European Commission, Commission presentation November 30: Meeting of the ECVET User's Group

NL: The state of play of the implementation of EQF in the Netherlands is best described as ongoing, but at a final stage. It was decided to design and develop an NQF (NLQF) to facilitate the referencing to EQF levels. Three steps can be identified:

- The first step taken in the Dutch process of implementation was the formation of an expert panel in the autumn of 2009 by the Ministry of Education, Culture and Science. This expert panel consisted of several experts from all education sectors. The members are consulted as experts and not as representatives of their sectors. The assignment for the group was to develop the descriptors of the levels of qualifications. Initially, 19 different types of qualifications were found, this number was brought back to 8 levels, consistent with the EQF levels. Furthermore, one extra level was attached at the lower end of the framework (level 0), to include education such as literacy schooling for adults.

- The second step in the process was a consultation round. This took place via 6 meetings with the stakeholders (including social partners). Further consultation was organised by means of a website, and an invitation to 400 stakeholders to react[149]. In total 128 persons provided their feedback on the draft framework. Most feedback originated from stakeholders within the formal education sector. The impact of the consultation round on the actual design of the NLQF seems rather limited.

- After the consultation, a third step was made. The Minister established an independent Commission (known by name of the chairman: Prof. dr. F. Leijnse) to evaluate the descriptors of the NLQF and advise the Minister on how to proceed. This Commission suggested some changes, e.g. the replacement of the school leaving certificate (in Dutch: Voorbereidend wetenschappelijk onderwijs: VWO) from level 4 to 5, and the introduction of a distinction in Bachelor learning outcomes. Although put on the same level, the descriptions of on the one hand the more professional oriented education (in Dutch: Hoger beroepsonderwijs: HBO) and on the other hand the academic oriented education (in Dutch: Wetenschappelijk onderwijs: WO) were different. An equivalent split for Master qualification is not suggested, because this difference in orientation is assumed to be less significant.

The minister adopted the advice for the most part into a referencing report, which was presented to the EQF Advisory Group. The report was however critically reviewed by the EQF AG because the argumentation of the placement of school leaving certificate was not founded to be demonstrated sufficiently. After a new consultation of the experts the decision is made to put VWO on level 4+. In December 2011 this solution is presented to the EQF Advisory Group.

According to the Dutch referencing report, the NQF does not entail a revision of the Dutch education system. Also, an NQF indication does not deliver rights to titles or degrees and finally, the NQF does not provide transition rights between education sectors and different levels[150].

PL: The process of the implementation of the Recommendation on the EQF in Poland is **ongoing**. In Poland the implementation of the Recommendation on the EQF is part of a broad reforming of the educational system. The scope of the reform project is broadened along the way, also with the involvement of more stakeholders. In recent

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[149] Advies Commissie NLQF – EQF, Introductie van het Nederlands Nationaal Kwalificatiekader NLQF in nationaal en Europees perspectief. Bijlage VII, 2011.

[150] See: Advies Commissie NLQF – EQF, Introductie van het Nederlands Nationaal Kwalificatiekader NLQF in nationaal en Europees perspectief, Bijlage VII, 2011.

years a National Qualifications Framework (NQF), called Polish Qualifications Framework (PQF), is being developed. For HE the referencing is almost ready, also due to the Bologna process. The lower levels, especially VET, are now the focus of attention.

A detailed schedule for the whole process 2009-2013 is made[151]. This scheme contains different stages including various activities, such as expert consultation, development of a glossary, conceptualising the referencing report, conducting pilot projects and carrying out supporting studies. According to this schedule, the development of the national qualifications framework and the referencing to the EQF levels will be completed by the end of 2013. Currently, the project is on schedule and the Polish referencing report is due to be presented to the EQF advisory group the second quarter of 2012.

IT: The referencing of national qualifications to the EQF is ongoing and a draft referencing report is expected to be presented to the EQF AG beginning of 2012. Italy chose first to draft a reference report and then to develop an own NQF for all qualifications. For higher education an Italian QF is already in place[152]. The referencing of the Italian qualifications to the eight levels of the EQF is considered first of all a technical procedure and is treated as a research project; mapping and analysing qualifications and referencing them to the EQF. For this reason the research institute ISFOL (the Italian Institute for the Development of Vocational Training for Workers) has been designated as the national coordination point (NCP) by the Ministry of Labour and the Ministry of Education.

ISFOL formed a technical group to plan actions aimed at referencing the qualifications system to the EQF. The research institute ISFOL conducted a mapping exercise and established a working group to make suggestions concerning referencing qualifications to EQF. The qualifications of general education and higher education (which are governed by the state) are already referenced to the EQF, the VET qualifications, (governed by the regions) are included in a draft reference report which is currently being discussed with the regions.

Since the Italian implementation of the recommendation on the EQF takes a different direction than most countries (first referencing the levels of the NQF to the EQF and then establishing an NQF), the referencing process has not yet led to major political debates on for instance level descriptors and the use of learning outcome approaches in describing qualifications. Therefore, although a referencing report is being drawn up, it remains questionable whether the Recommendation will actually be implemented in the short term and whether qualifications are indeed described in terms of learning outcomes. Especially at regional level there are differences: some regions have related learning pathways to learning outcomes, others are still at an initial phase in doing this.

UK Scot: The first stage of the implementation is finalised. The Scottish NQF (SCQF) was referenced to the EQF in February 2010 as part of the overall UK referencing process. As the SCQF was developed and implemented in 2001, and therefore preceded the development of the EQF, the first stage of the implementation of the EQF entailed referencing the existing 12-level SCQF to the 8-level EQF.

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[151] Polish NCP, Developing The National Qualifications System in Poland, Roadmap 2009-2013, two parts.
[152] Italian Qualifications Framework (Quadro dei Titoli Italiani - QTI), see: Ministry of Education, University and Research, Department for University, Higher Education in Fine Arts, Music and Dance and for Research, Italian Qualifications Framework: Qualifications Framework for the European Higher Education Area, 2011.

The work on the referencing started in June 2008. The internal Scottish process was organised through the Board of the Scottish Credit and Qualifications Framework Partnership (SCQFP). This board appointed a Quality Committee to look after the integrity of the framework. This committee is in charge of any work which involves referencing the SCQF to any other framework. It established a Steering Group to manage the activities of the NCP[153].

DE: The first stage of the implementation is **ongoing**. Until recently, the draft referencing report was expected to be prepared by 2011 and the final report was to be submitted by 2012.[154] Currently, almost all formal qualifications are referenced to the DQR. However, fundamental differences about the appropriate level of the German school-leaving certificate (the *Abitur*) pose a serious threat to the pace of the implementation-process. As a result, it remains to be seen whether the intended deadlines will be met and whether further delays can be avoided.

Nevertheless, if the different factions involved in this debate manage to resolve the issue of how to reference the *Abitur*, Germany should be able to commence with the practical implementation swiftly, as much of the preparatory work (such as developing a practical guide to facilitate the alignment of qualifications across the German educational system) has already been carried out.

So far, the first stage of the implementation included:
- Conceptualisation and design: comparatively much time and effort was put into the phase of conceptualising and designing the structure and outlines of the DQR. An initial proposal for the structure and outlines of the DQR was published in February 2009. This proposal provided the basis for an extensive testing phase, during which qualifications from four selected sectors (IT, metal, health and the trade sector) were used as 'testing ground' for referencing exemplarily qualifications to the appropriate level of the DQR. Based on the results of this testing phase, a final proposal for the lay-out and content of the DQR was submitted to the Federal Ministry of Education and Research and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Republic of Germany for approval and formal adoption in March 2011[155].
- Referencing formal qualifications to the DQR: Following the adoption of the framework, a high-level working-group consisting of stakeholders (the Arbeitskreis) undertook the task of referencing all formal qualifications to the appropriate level of the framework. As a result of the above-mentioned differences concerning the referencing of the *Abitur*, the implementation process recently came to a halt here.

AT: The first stage of implementation is not finalised yet. According to the government programme (2008-13)[156] it is expected that all Austrian national qualifications will be included in the eight-level national structure by 2013.

This NQF is meant to describe all national qualifications, including non-formal and informal learning. Hereto three corridors are proposed: one for referencing the formal education, one for non-formal education and one for informal learning. Currently, debates concern the first corridor.

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[153] Cedefop, National qualifications frameworks development in Europe, 2011.
[154] Cedefop, National qualifications frameworks development in Europe, 2011.
[155] Cedefop, National qualifications frameworks development in Europe, 2011.
[156] Regierungsprogramm der 24. Gesetzgebungsperiode (2008-2013), available from Internet www.austria.gv.at/DocView.axd?CobId=32965 [cited07.07.2011].

The Austrian level descriptors were developed in 2009. The attempts to describe the levels lead to severe discussions among the stakeholders. Especially the way in which the descriptors as used in the Bologna process (Dublin descriptors for Ba, Ma, and PhD cycle) should get into the NQF was reason for debate. The introduction of a Y-rule ended the discussion and the process could move on. The Y-rule introduces a split in the NQF for the level 6-8. One branch of the split contains Bologna (Ba/Ma/Phd), the other one all non-HE qualifications. With the split the NQF allows academically and vocationally oriented qualifications to coexist[157].

In 2011 the NQF is tested, from May onwards. The first version of the referencing report was presented nationally on 1 December 2011. This report contains more a description of the referencing process and an outline for the final referencing, than the referencing itself which has not been finished yet. The stakeholders were not involved to a great extend in the constructing process of the referencing report.

A new Austrian law will be implemented in March/April 2012, which will give a legal basis to the NQF. Also in March 2012, the referencing report will be presented to the EQF AG. The Austrian referencing report is comparable to the one in Belgium, in the way that it will not contain all references, but have some examples of qualifications to give insight into the levels.

On the basis of the country information presented above one can conclude that despite the differences, even in point of departure and progress made, there are some similarities among countries. For all countries it is true that the implementation (i.e. referencing) responds to and includes national characteristics of the education system. Clear examples are for instance the Dutch case focussing on where they should position the school leaving certificate (level 4 and 5 and finally decided to put in on at 4+; similar to the German case concerning Abitur); the Austrian introduction of the Y-rule to split the framework for level 6 and higher; the Italian difficulties to reference qualifications which are governed at a decentralised, regional level and the Scottish case where a fully developed framework was already in place. In general, groups of countries sharing similarities can be identified according to the following criteria:

- Some take a technical approach, others a more reform driven approach:

- Some see the implementation of the EQF and the development of an own NQF as the same process, others clearly make a distinction between both (for different reasons the UK (already established an NQF) and IT (will develop an NQF after implementing the EQF)).

In the figure below, which is not the result of 'exact science' but an estimation on the basis of the available information, the countries are positioned according to the two dimensions described here above in relation to their implementation of the 2008 Recommendation on the EQF. The countries which show similarities are grouped together.

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[157] Cedefop, National qualifications frameworks development in Europe, 2011.

Figure 2: Positioning of MS in relation to their approach towards implementing the EQF Recommendation
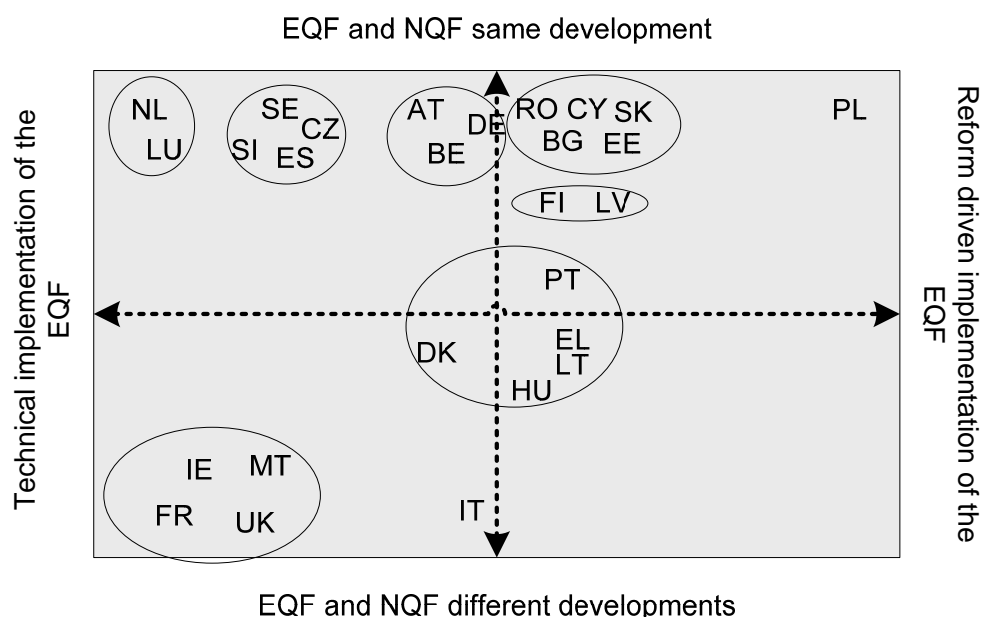
Source: Authors

3.5.3. Second step in referencing (Deadline 2012)

The 2008 Recommendation invited MS to make sure that all new qualification certificates, diplomas and Europass documents contain a reference to the appropriate EQF level by 2012. At this moment (as of 1st of January 2012), none of the countries have followed up this invitation. In most of the countries, however, some developments in this direction can be noticed. In general four groups of countries can be identified:

- Countries that have initiated measures and where the first stage of the implementation is finalised (FR)

- Countries that have initiated measures, although their referencing report is not yet finalised (NL, AT, DE, and FI)

- Countries that have not yet initiated measures since their referencing report is not yet finalised (BE, BG, CY, CZ, DK, EE, EL, HU, IT, LV, LT, LU, PL, PT, RO, SK, SI, ES, and SE).

- Countries that have not yet initiated measures despite that they have finalised the first referencing stage (UK, IE, and MT).

In the box below further descriptions are presented of the state of play of some of the MS in relation to this second step.

Box: Examples of the state of play with regard to the second step of referencing

IT: Concerning the implementation of the EQF, first an Italian Qualifications Framework has to be established before progressing to the second stage of referencing. It is unknown what the time plan will be for including EQF references on all new qualifications. It can be argued that since in Italy first qualifications are linked to the EQF and then in a second stage a national framework is being developed, referencing the individual qualifications to the EQF is indeed not problematic; however, how all individual qualifications are related to each other is a different issue and still requires a lot of work.

NL: Procedures are being developed to reference each qualification to the NQF (and subsequently to the EQF) and to put an EQF-tag on each qualification issued by a competent body. Formal qualifications are automatically referenced, although providers have the ability to provide arguments to put an individual qualification at another level. For other qualifications a threshold is introduced before they receive the possibility to be referenced. A qualification should be the result of a learning programme with a minimum learning effort of 400 hours[158]. The reason for introducing this threshold is to include only qualifications which represent a substantial learning effort, although this is not completely in line with the EQF principle of the outcome indicators. The effect of this threshold on the non-formal education is being analysed. The NCP will have the task to coordinate and conduct the referencing of individual qualifications and will be functional from the 1st of February 2012. The VET sector is invited to make a request about referencing of education on the highest level (MBO4, in principle level 4) for an upgrade to level 5. Also non-formal education can have its education referenced. The NCP is a so-called light organization, which has to be cost-effective. Therefore, suppliers of education have to pay for a request for referencing. Since the formal education is automatically referenced, and the exception of a year is made for MBO4, the payment applies at this stage mainly to the non-formal sector. Also because of this extra year of MBO4 referencing, the EQF-tagging to the diplomas is planned for 2013.

SE: The second stage of the implementation has not yet started. As it is not clear when the first stage will be finalised, it is difficult to predict when the second stage will be implemented. Nevertheless, although somewhat limited by the pending government decision, preparations to swiftly implement this stage are currently undertaken. As a first step, the NCP is planning a conference with public education providers on how to carry out this second stage of the implementation in the spring of 2012.

PL: The second phase of implementation of the EQF in Poland will not be finished in 2012, it is planned for 2013. The EQF implementation is used as a reform agenda, and some changes in the educational system are already put through. The Polish NQF (PQF) is already implemented in HE, the implementation in VET is about to happen. The curricula in General Education have already shifted towards learning outcomes, so the expectation is that further implementation could be done relatively quickly. According to the Polish roadmap the assignment of the last qualifications is planned for February 2013[159]. Although the process is supposed to be on schedule, some stakeholders are not confident about reaching the deadline of the first phase, so maintaining the deadline for the second stage of the implementation is challenging.

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[158] Ministerie van Onderwijs, Cultuur en Wetenschap, Aanbieding advies Commissie NLQF - EQF met beleidsdreactie, 8 July, 2011.
[159] Polish NCP, Developing The National Qualifications System in Poland, Roadmap 2009-2013, two parts.

UK Scot: The second stage will not be implemented. The requirement to include a reference to EQF levels on certificates is considered challenging and this issue was explored tentatively in a broad, UK-wide consultation process, including employers, students, colleges, universities and awarding organisations.

The consultation process did not show any strong support for the inclusion of the EQF-levels in UK certificates amongst stakeholders. This lack of enthusiasm amongst stakeholders is partly due to the different structures of the NQFs and the EQF (e.g. the SCQF consisting of 12 levels, whereas the EQF is an 8-level framework), which would mean that certificates would be showing two different levels. This was judged to be confusing rather than helpful by many stakeholders, including employers. Furthermore, both employers and formal education providers feared that this could ultimately lead to the erosion of the SCQF amongst foreign employers: as the EQF-level would always be lower than the SCQF-level (since the EQF simply does not consist of as many levels as the SCQF), this might cause doubts about the quality of the Scottish qualifications: "*This employee has a Scottish level 7, but only a European level 5. I wonder if that means the Scottish qualification isn't any good*". Also, both employers and learners indicated they still need to get familiar with understanding their own national frameworks. Therefore, putting in another different framework was not considered to be helpful.

The view amongst stakeholders was that there were other ways of communicating about the EQF, and that putting it on a certificate was not the way forward.

The UK's National Coordination Points for the EQF are currently in the process of drafting a briefing note to ministers in the UK to make a response to the European Commission before the end of December. The nature of this response will be that the UK does not feel that putting the EQF level on certificates is a helpful way forward. Instead, the UK will use other ways to promote the EQF-levels, for example by referencing all credits in the SCQF online database to the appropriate EQF-level. The education and training programs in this database show both the SCQF and the EQF level. Furthermore, if an awarding body would wish to put the EQF-level on their certificates, they could do so, but the legislative bodies in the UK will not go so far as advising or even mandating it.

DE: The second stage of the implementation has not yet started. As it is not clear when the first stage will be finalised, it is difficult to predict when the second stage will be implemented. However, as involvement and commitment of the relevant stakeholders (i.e. education institutions) is substantial, it is expected that this second stage will be carried out in a swift and efficient way and, depending on the outcome of the debate on the *Abitur,* could still be concluded in 2012.

AT: The second phase has not yet been started. First, the referencing process has to be finished. The second phase will be starting in April 2012 or later, when a new law is accepted giving legal grounds to the NQF. It is not clear when the second stage will be finished. It is even mentioned that the second stage will not be implemented before 2014. In that case, the Austrian governmental elections of that year could influence the implementation, since the two main political parties disagree on the Austrian NQF. This disagreement concerns the implications of the implementation on the medium and long term: will it lead to reforms, or will it remain a description of current practice.

Progress towards the second deadline is difficult to assess. Firstly, since many countries are not yet at this stage in the whole implementation process (still prioritising the drafting of the referencing report); secondly, since it is not easy to see when the second stage is finalised. In other words, it is not exactly clear what measures are taken to implement the second stage. There are not many countries that have experience with this (in fact none of the countries have finalised the process) and many unanswered questions exist, such as: to which qualifications should it apply? Is there public support for this step and how can this be fostered amongst stakeholders? Is including references in a database instead of putting an EQF-tag on a diploma sufficient? Does it entail an ongoing process? Does it entail only developing the right procedures for this? Countries are currently starting up debates on these issues and are finding their own way of approaching it, with, consequently, different results.

There are serious doubts whether the second step in referencing will finally take place. Currently, many countries are still in the process of drawing up their referencing reports and have not yet paid attention to establishing procedures for mentioning the EQF levels at all new qualifications. In addition, even the countries that have already completed their referencing report have not yet undertaken actions towards organising the second referencing step. What is more, the UK, the country most advanced in the development of their qualifications frameworks (for each region), decided not to follow this recommendation.

3.5.4. To conclude

In addition to the two deadlines and the possibility to monitor progress towards these deadlines, there are a number of European indicators which can be used to compare education systems (educational attainment, school drop-out rates, lifelong learning rates, PIAAC, PISA etc.[160]). These indicators are included as benchmarking instruments in the EU2020 strategy. When it comes to evaluate progression with regard to lifelong learning, labour and learning mobility, and improved education systems, in the long term these indicators can be used to monitor the impact of the developments of the NQFs and the implementation of the EQF. At this moment, however, it is still too early to use these indicators for assessing the impact.

All in all, with regard to the first deadline, there is some delay in the implementation. With one year delay not even half of the countries have nearly finalised the referencing report. For the year 2012 it however looks promising and at the end of 2012 it is foreseen that all countries have finalised their referencing report. Although there is a delay, the fact that probably all countries will have drawn up a referencing report by 2012 can be regarded as a major accomplishment of the EQF implementation, contributing to the transparency of the education sector as a whole in Europe.

With regard to the second stage it can be concluded that the countries are not doing well, since they have not really started working on measures to implement the second stage. Also, it remains questionable whether the countries are fully devoted to this second stage of the implementation. The emphasis has been and still is on developing and further improving the NQFs and referencing reports. This poses a serious threat to the whole implementation, since if the EQF will not 'touch the ground', i.e. when it remains a reality on paper and not for the end-users, citizens and employers will not develop a relationship

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[160] See: Eurostat: main tables on education and training:
http://epp.eurostat.ec.europa.eu/portal/page/portal/education/data/main_tables; OECD Programme for the International Assessment of Adult Competencies (PIAAC):
http://www.oecd.org/document/57/0,3343,en_2649_33927_34474617_1_1_1_1,00.html; OECD Programme for International Student Assessment:
http://www.pisa.oecd.org/pages/0,2987,en_32252351_32235731_1_1_1_1,00.html.

with the EQF and hence it cannot fulfil its objective of being a trustworthy translation device between different countries and education sectors.

3.6. Involvement and cooperation of stakeholders[161]

The learning outcome approach, one of the main principles behind the EQF and the development of NQFs aims at increasing the involvement of end users of qualifications, namely citizens and social partners (employees and employers) in making qualifications better fit the needs of the labour market. For this reason, the involvement of, and the cooperation with, stakeholders outside the education sector is pivotal. In addition, also the involvement of stakeholders outside the formal education sector (non-formal, informal learning sector, private sector) is considered to be essential to build links between different learning pathways (formal, non-formal and informal learning).

3.6.1. Stakeholder involvement at EU level

At European level the stakeholder involvement is considered to be of high quality. The different stakeholders were involved from the beginning and were consulted prior to the publication of the 2008 Recommendation. As has been discussed in section 3.2.1, responses came for the largest part from national authorities and education providers. The social partners provided 8 percent of the responses[162]. In addition, the most relevant stakeholders are members of the EQF AG and play an active role in this group. Moreover, events are organised to involve stakeholders in the implementation of EQF, such as the recently organised Cedefop conference for national social partners on European tools in November 2011 to increase their knowledge and involvement in European-wide developments[163].

Certain key players from the side of the European Commission might however be missing in discussions concerning the EQF, namely DG EMPL and DG MARKT. The learning outcomes approach aims at increasing the involvement of labour market dynamics in education programmes. Labour market policy is the field of DG EMPL, especially when it involves issues such as the ageing population, mobility of workers and upgrading skills of the workforce. The cooperation between the education sector and the employment sector at European level is established in the framework of the European Skills, Competencies and Occupations taxonomy project (ESCO). The ESCO project is discussed in the EQF AG meetings and there is close cooperation between the two projects. However, although the ESCO first draft version has not yet been made public, it appears that in terms of concepts and language used, there might be some difficulties between ESCO and EQF. For instance, the levelling of skills and competencies in the project description of ESCO does not align with the levelling of knowledge, skills and competences in the EQF project. This can only be seen as an indication that increased cooperation between the two projects might be required. Also, in relation to levelling barriers for professional recognition and recognition on qualifications, the involvement of DG MARKT might be desirable (see also chapter 2).

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[161] The fifth condition, namely the involvement and cooperation of stakeholders, is of crucial importance for the success of the OMC, as the method is theoretically supposed to work bottom-up. Guidance and coordination at the community level will only be effective and sustainable, if the programme is supported by the Member States and its civil society and actively implemented at the local level. Therefore, not only should stakeholders be willing to participate in EU events and meetings on certain topics, but also stakeholders should be involved in national policy making and implementation.

[162] See: Pôle Universitaire Européen de Lorraine, Summary of responses received to the Commission's consultation on the EQF during the 2nd half of 2005, 2006:
http://ec.europa.eu/education/policies/educ/eqf/results/summary.pdf

3.6.2. Stakeholder involvement at MS level

At MS level there is a wide variety in the level of stakeholder involvement, depending on the approach taken and the character of the established NQF (technical implementation or reform-driven implementation). In cases where the EQF implementation is rather technical, the role different stakeholders play is often clearly defined, and most of the time the formal education sectors and its responsible ministries take a leading role. In countries where the implementation of the EQF is taken as an incentive for issuing a reform agenda, roles and responsibilities need to be re-defined since some stakeholders (for instance employers and employees, the non-formal sector) are becoming more important and need to be included in this reform process. All in all, different groups of stakeholders are involved in the implementation of the EQF or the establishment of an NQF[164], amongst others: education providers (the formal sector; non-formal, private sector); employers' organisations; employees' organisations, different Ministries, research institutes, and committees. The way they are involved ranges from true involvement in drafting level descriptors to providing feedback on drafted, nearly final, referencing report. As a general tendency it can be concluded that the involvement of stakeholders outside the education sector (e.g. employers, employees) remains a challenge. The box below provides an overview of country information concerning the involvement of stakeholders.

Box: Examples of stakeholder involvement

NL: The Dutch process of stakeholder involvement consisted of four distinct activities: Firstly, the establishing of an expert group consisting of several experts from all education sectors. Secondly, a consultation round was organised. This took place via six meetings with the stakeholders (including social partners), a website, and an invitation of 400 stakeholders to react[165]. Thirdly, a specially formed commission of four professors provided recommendations for a final NLQF, and suggested some changes to the draft NLQF so far developed. Still, despite the three methods of stakeholder involvement, the impact of the consultation is considered to be small and no mutual ownership is established with the employers' side.

UK (Scot): The SCQF is maintained by a partnership including all relevant stakeholders from the formal education sector. The SCQF is therefore literally owned by stakeholders rather than by a government body. It is characterised by a bottom-up approach: the framework was initiated by stakeholders themselves, rather than by the government. A high degree of ownership can be observed towards the SCQF. This has historic routes since the framework originated from, and brought together, three previously developed frameworks governed by different organisations. The framework is, because of this mutual ownership, well recognised and accepted by all stakeholders.

IT: As a result of the approach chosen, until now stakeholders have not been very much involved. The work on the referencing to the EQF is led by the Ministry of Education, University and Research and Ministry of Labour and Social Policies. The Ministries designated ISFOL as NCP to guide the referencing at a technical level. A technical group was established by ISFOL involving both Ministries. Currently, the draft referencing report is being discussed with the regions.

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[163] See Cedefop conference 'The role of the social partners in implementing European tools and principles, increasing the relevance of education and training to the labour market' on 24-25 November 2011 in Brussels

[164] This section is based on: Cedefop, National qualifications frameworks development in Europe, 2011.

[165] Advies Commissie NLQF – EQF, Introductie van het Nederlands Nationaal Kwalificatiekader NLQF in nationaal en Europees perspectief. Bijlage VII, 2011. In total 128 persons gave their feedback on the draft framework, mostly from the education sector. The employers are not really involved in the process, also because of a lack of interest from their part. The impact of the consultation round on the actual design of the NLQF seems limited.

The reforms which have been taken place in recent years (such as implementing the learning outcome approach in upper secondary education) and which finally will lead to developing an NQF, involve broader groups of stakeholders, such as the social partners[166]. For instance on discussions on what the implementation of an NQF could mean for salaries of workers, the social partners are heard. However, this is often more considered as providing information and 'educating' the stakeholders than as a true involvement of stakeholders.

Stakeholders, for instance employers, are interested in the EQF and the developments towards an NQF. They do understand that it can potentially solve problems they have with finding qualified personnel, lifelong learning and labour mobility. From their point of view an increased impact of the NQF development on educational programmes is desirable.

AT: In the Austrian process of implementation of EQF, stakeholders have quite a large role, in the sense that a broad range of stakeholders is involved. The project group as well as the steering group has members from several sectors, and an impressive consultation round was held among many stakeholders from educational and social sectors. But the way of involvement has shown to be critical in the process. The process of implementation came to a hold twice, because of disagreements among the stakeholders. The stakeholders seem to be divided into two camps: HE on one side and VET on the other. The main disagreement was on the higher levels (6-8) of the NQF. Due to too many conflicts of interest in the steering group, the process of referencing is transferred to a more independent NCP.

Two main issues regarding the role of the stakeholders may lay the base of the conflicts. Firstly, the position of the Austrian Federal Ministry for Education, Arts and Culture and the Austrian Federal Ministry for Science and Research in the process. Although both are officially in charge, the former is actually the leader of the project. It seems that a lack of cooperation between the two ministries exists, resulting from the political background of the responsible ministers. The ministers of both ministries are from different political parties, which do not agree on the subject. Secondly, although a lot of stakeholders are involved in the steering group, the educational sector was at first not involved. Once allowed to join, no voting rights were given. This is about to change, also more representatives of the social partners will be allowed. Although the Austrian Federal Ministry for Science and Research is involved in the steering group as a representative of HE, the inclusion of social partners and all other ministries, with a stronger interest in the economical impact of EQF, gave HE the idea of not being heard.

All these issues together lead to some kind of distrust among the stakeholders, provoking the conflicts of interest which led twice to a hold, once with the development of the descriptors – leading to the Y-rule – and once in the simulation process. HE declares that only 'economical education' was taken into account in the pilot projects, which enforced the feeling of being excluded.

The question is whether the transfer to the NCP will lead to more engagement of the stakeholders, because not everyone is convinced that the construction of the NCP is free of interests. The teacher training colleges, also HE, are not included. It is mentioned that this is due to political instead of objective reasons.

PL: A working group was formed at the start of the process, included a broad range of stakeholders, representing higher education, general education, vocational education and training, employers as well as institutions directly concerned by the setting up of the framework.

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[166] Cedefop, National qualifications frameworks development in Europe, 2011.

The process on developing the Polish Qualifications Framework was transferred to an Intra-Ministerial Taskforce for Lifelong Learning Strategy and a steering committee, run by the Ministry of Research and HE. This Taskforce was supported by the Polish NCP as well as by the Educational Research Institute both fulfilling a major role in the process. The Intra-Ministerial Taskforce includes, as the name says, several Ministries: Ministry of National Education, Ministry for Research and HE, Ministry of Economy, Ministry of Labour and Social Policy, Ministry of Health. The Steering Group is a sub-group of the Task-force, and consists of the above Ministries accompanied by the Ministry of Culture and the Ministry of Defence.

The first round of consultation was held in the first half of 2011 by a public debate, which involved at least 100 institutions, including public institutions of education, ministries, teachers, employers, craft union, agencies, training companies, human resource agencies. The debate covered three main topics: (i) the structure and level descriptors of the PQF, (ii) the role of the PQF in overcoming barriers in LLL and (iii) validation process and quality assurance[167].

The outcomes of this debate were used in the ongoing process of developing the PQF, but it was also mentioned that it was a learning process in itself in creating understanding among the stakeholders. According to the evaluation questionnaire held afterwards, the stakeholders did have the feeling of being heard and taken seriously. When asked "Did the debates influence the final design of the PQF", 71 persons (88.1%) responded in the affirmative[168]. The fact that the debate passed without much disagreement, and that it created support for the development of the PQF among the stakeholders, might illustrate that the stakeholders were satisfied with their way of involvement.

SE: Stakeholders were involved in a number of expert and working groups on the development and implementation of the NQF. Cedefop distinguishes the following activities that were undertaken:

- A national advisory board has been chaired by YH and consists of representatives of the national agency for education (Skolverket), the national agency for higher education (Högskolverket), the Employers federation, regional authorities, main trade union associations and the public employment services.
- A national reference group consisting of organisations and agencies forming part of the public education and training system - or being closely associated to this. Participants in this group are, among others, the Swedish University Association, the Swedish Student Association and the Swedish Association for Popular Education (Folkbildning).
- A number of project groups have been working on particular aspects of the framework and its implementation. In 2011, working groups were set up to consider how to open up the framework to external qualifications; how to use levels 6-8 of the framework; and how to include public qualifications awarded outside the education sector.
- Public consultations were carried out in both 2010 and 2011. Approximately 50 organisations and authorities responded to the outline of the Framework submitted for consultation in June 2010. The big majority of responses were positive and saw the proposal as a good basis for further developments. A small minority (2) saw no need for the framework. A slightly higher number of stakeholders responded to the 2011 consultation focussing on levels 6-8 of the framework. In addition to the above a number of national conferences and events have been organised.

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[167] Cedefop, National qualifications frameworks development in Europe, 2011.
[168] Dębowski, H., Chłoń-Domińczak, A., Lechowicz, E., Trawińska-Konador, K., Sławiński, S. Report of the debate: Appendix 2 Results of the evaluation questionnaire, 2011.

Cedefop indicates that the development of the Swedish NQF since 2009 has involved a broad group of stakeholders, from the education and training system as well as the labour market. This broad involvement reflects the initial objective of the Ministry to open up the framework to qualifications offered outside the public sector[169].

However, there are indications that the sense of ownership and commitment to the framework amongst certain stakeholders nevertheless is still somewhat limited. Stake-holder organisations did make their contribution when participating in the working groups and consultation rounds, but it is now considered largely up to the assessment of successively the YH and the government to fine-tune and finalise the framework. As one of the stakeholders interviewed puts it: "We have done our part. (…) We handed over the material on our qualifications, and now the YH and the government are free to treat that as they will."

A particular feature of stakeholder involvement in Sweden is the central role attributed to YH, the national agency for higher vocational education, in coordinating the development of the NQF. The national agency was set up in 2008 with the responsibility of ad-ministering what is in reality a new strand of the Swedish higher education and training system. Providing high level education and training directly relevant to the labour market, 'Yrkeshögskolan' has attracted a lot of interest both among individuals and employers. Offering an alternative to the traditional university sector, for example by combining theoretically and practically oriented learning, the new institutions can be seen as complementing existing education and training provisions and qualifications[170].

DE: The German implementation-process is very much characterised by a consensus-based, bottom-up model, in which representatives of the relevant stakeholder-groups collectively shape the DQR, and in which not one single party or agency (including the government) can force through decisions without the consent of the other stakeholders. Stakeholders are therefore extensively involved and engaged in both the development and implementation of the DQR.

For this purpose, the high-level working group Arbeitskreis DQR was established, which comprises stakeholders from HE, school education, VET, social partners, public institutions from education and the labour market as well as researchers and practitioners. Decisions are based on consensus and each of the members works closely with their respective constituent institutions and organisations[171]. The responsibility for both developing and fine-tuning the DQR was delegated to the Arbeitskreis. The Arbeitskreis not only shaped the outlines and structure of the DQR, but is also collectively concerned with the task of referencing all formal qualifications to the framework.

This approach results in a strong sense of engagement and ownership amongst stake-holders. A possible drawback is the lack of a neutral, overarching authority, which has the power to make decisions when the stakeholders themselves do not manage to reach consensus.

3.6.3. To conclude

In general it can be concluded that the involvement of certain types of stakeholders, both at EU and MS level lacks behind (i.e. involvement of the labour market side). For this reason, in many countries the EQF and the establishment of an NQF remains predominantly an educational issue, and the social partners are not always involved to a full extent or do not have sufficient interest in the project. This creates a severe threat to the future

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[169] Cedefop, National qualifications frameworks development in Europe, 2011.
[170] Cedefop, National qualifications frameworks development in Europe, 2011.
[171] Cedefop, National qualifications frameworks development in Europe, 2011.

broadness and embedding of the NQF and the EQF at both European and MS level, also in relation to the second stage of referencing. If the end users are not involved and no ownership is being created, the second stage of the implementation will probably not be implemented entirely. As a result, the EQF will not reach its full potential.

3.7. Presence of conflict[172]

In this section the focus is on whether there are differences between the MS that cause them to act and react. Also, secondly at MS level, the presence of conflicting interests between stakeholders can provide an impetus for policy development.

As has been indicated in the previous sections at European level the OMC can be characterised as a 'learning by doing' process. This learning by doing is continuously provoked by interfering issues. To mention some examples: 1) How do MS deal with implementing the learning outcome approach? 2) What are the criteria for clear and demonstrable referencing? 3) On which level should the school leaving certificate giving access to higher education be positioned? All these issues came to the foreground when MS were confronted with the difficulty and when MS were not satisfied with the solution at hand. Within the EQF AG the particular issues were discussed and together solutions have been found, or will be found in the future.

The EQF AG is effective in providing peer review to each others' referencing reports. The criticisms, both in writing and discussed plenary, are drawn up in a country note and provide an incentive for the MS to improve its referencing report. Still, in the end, it remains the responsibility of the MS to call its referencing report final and hence it is not obligatory to follow up the feedback given. The conflicting situations concerning the school leaving certificates (NL, AT and DE), can provide a test case for seeing how the EQF AG deals with these kind of situations: can international peer pressure level national forces in deciding where to position these types of qualifications? There is a possibility that conflicts could lead to escalation, where diverging opinions are irreconcilable and where hence the common concern could be lost.

At national level, whether there are conflicts that call for solutions depends to a large extend on the approach taken to implement the EQF and on the involvement of stakeholders at national level. In general, countries which pursue a rather technical implementation are confronted with fewer conflicts than countries which use the implementation as a transform of reform agenda for their education system. It is possible, however, that the technical implementation of the EQF triggers debates and conflicts to occur which finally lead to a reform approach. In that case (e.g. in Norway), the technical implementation exposes weaknesses in national education systems and triggers shifts in stakeholders' involvement.

To conclude, there are differences between countries with regard to their stage of development of an NQF, in drafting their referencing reports, ideologies, aims of the implementation of the EQF, education system and stakeholders involved. These differences trigger MS to better explain their particular situation in comparison to the situation of other countries. The EQF AG provides a platform to explain differences and to identify common

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[172] A final condition is the presence of a conflict (policy directions / ideology) between Member States with an incentive to act or reluctance to act. Because of a conflict of opinions, the Member States with an incentive to act will try to persuade the reluctant Member States to join them in developing a particular policy field. If there is no conflict, no debate will follow and few actions will be initiated. The same applies to the national level, where the more reluctant parties will have to be convinced of the importance of a potential national priority. In order to get a topic on the national agenda someone needs to be absolutely convinced of its importance and lobby for more support.

elements and objectives leading finally to improved comparability of different national education systems.

However, there are also a lot of potential conflicts, which have not fully developed due to the lack of involvement of some stakeholders at national level in some countries. For instance, debates concerning the role of private providers and the non-formal sector. Also, the employers' voice has not been heard as much as is desired. Hence, despite the fact that the implementation of the EQF triggered a lot of debate and discussion (and hence change and development), there is room for even more debates and consequently more development of national qualification frameworks and systems.

3.8. Overall concluding remarks

In this final section some summarising statements and remarks are provided on chapter 3,

There are major differences in the situations from which the countries initiated the implementation of the EQF. Countries such as the UK, IE, MT and FR already began working on qualifications frameworks and had already provided descriptions of qualifications in terms of learning outcomes. For these countries, therefore, it was relatively easy to reference their qualifications to the EQF. Other countries, such as the New MS and Southern European countries, were in need to review and revise their education systems and needed to start introducing the learning outcome approach in describing their qualifications. Finally, there were countries which had well established education systems and in which some form of learning outcome based approach was already implemented. Despite the differences, there is a common objective to establish transparency and mutual trust in each other's qualification framework or system. Only by this mutual trust labour mobility can be better facilitated and stimulated.

Given the common objective and the differences in starting position, different paths exist for each country in the implementation process. Advanced countries have already taken some hurdles and can stimulate other countries to follow their example. Less advanced countries face different types of problems and seek interesting practices and examples on how other countries dealt with them.

Due to the common objective, it is in the interest of all countries that the implementation at MS level is carried out in a trustworthy manner. The EQF AG, based on the experiences of countries already dealing with referencing, or implementing the learning outcomes approach, initiated working groups, peer learning activities and also drew up guidance notes to help stakeholders and policy makers at national level to mitigate difficulties they come across in their work.

A driving force behind the MS to continue to work on the implementation is the continuous monitoring of progress and the comparison between countries on particular items (for instance concerning the issue of on which level to place the school leaving certificate, giving access to higher education). Furthermore, individual members of the EQF AG (some of whom provided the foundations of the Recommendation on the EQF) still play an active role, making sure that the group process is continued and ongoing, pointing to the original aims and the route to follow.

The implementation of the Recommendation seems to have rather tight deadlines. The MS agreed voluntarily to these tight deadlines. This was only possible because preparatory political involvement was in place: countries had been already aware for years of the initiative and were involved in shaping the Recommendation. The stated deadlines were meant to increase momentum for action at national level. Indeed, most countries will not finalise their referencing report within the given deadline, but the delay will not be

problematic (it is estimated that the delay will be approximately two years). More problematic however, is the progress with regard to the second deadline concerning including a reference to the appropriate EQF level at each new qualification and Europass document. Many countries have not even started working on procedures to guarantee that this will happen, even if they finalised their referencing report. What is more, the UK stated that it will not follow up on this second stage in the strict sense, but included a reference to the EQF in an online database of qualifications.

Without completing the second stage, the whole project is seriously threatened. The second stage transports the EQF project from a high policy level to the ground level of the final beneficiaries (citizens, workers and employers). This step is necessary to make them aware of how the EQF works in practice, to develop mutual trust at this level and to start discussions, and hence developments, on practical aspects of the implementation of the EQF and the learning outcome approach (assessment tools for providers, quality and competences of teaching staff, using the EQF in job adverts etc.).

At this moment it is not too late to work on the second stage but in many countries some underlying conditions for implementing the second stage have not been met. For instance, the stakeholders (i.e. final beneficiaries: social partners and citizens) are not sufficiently involved. The EQF remains too much an education policy issue instead of a labour market issue.

As a conclusion, the MS and the European Commission are urged to increase the focus on these issues with the aim to complete the second stage of referencing.

4. OUTCOMES OF THE EQF

KEY FINDINGS

- In previous academic research critical assessments can be found of the impact of qualifications frameworks, claiming that the evidence base for implementing qualification frameworks is lacking. Also the shift to learning outcomes might destabilise existing education structures and distract attention from more pressing national educational issues. Although these accounts are valued as counterpoint for 'sheer policy-believing', the hard evidence that qualifications frameworks will not lead to impact is as questionable as the hard evidence that qualifications framework will lead to impact. For providing a clear and reasonable view on the outcomes one firstly needs to define the impact categories qualifications frameworks are aiming at. Secondly, one should be realistic about what can reasonably be measured and concluded given the time span of the implementation. To gain a balanced judgement of outcomes of the process, a distinction should be made between three categories of outcome: output, results and impact of the EQF implementation.

- It can be concluded that the **output** of the whole EQF project until now is satisfactory for most stakeholders involved and is progressing according to plan. The 2008 Recommendation and the preparatory work triggered a lot of activities in the MS and at European level which are clearly related to the final objectives of the Recommendation. A serious flaw is that it is questionable whether the second step in referencing will be finalised.

- The **results** of the EQF project, defined as increasing transparency and stakeholder involvement, almost four years after the publication of the Recommendation are promising, but at this point insufficient for realising the final objectives improving labour mobility and increasing lifelong learning. Fields in which insufficient progress has been made concern the implementation of the learning outcome approach, stakeholder involvement, establishment of quality assurance systems and the further establishment of validation procedures for non-formal and informal learning.

- The **impact** on the main objectives of the EQF, increased lifelong learning and labour mobility, can at this moment not be made visible to a large extent. In the first place, it is still (almost four years after the Recommendation) relatively early to see impact and only anecdotal evidence exists where qualifications frameworks facilitate validation of prior learning and make national systems comparable. Secondly, due to a lack of progress in relation to the envisaged results, it remains questionable whether full impact will be reached in the short term.

4.1. Some critical accounts regarding the outcomes of QFs

The question whether QFs lead to the envisaged results, has been subject to some critical analyses in academic and policy research literature in recent years. Some authors expressed their doubts about whether NQFs eventually lead to the foreseen results. On the basis of the International Labour Organization's comparison of qualifications frameworks in 16 countries,[173] Allais recently concluded, among else, the following[174]:

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[173] The study produced 16 case studies: five focused on the 'early starters' (Australia, England, New Zealand, Scotland, and South Africa) and were based on a review of available literature while the other 11 case studies

- The research found little evidence that NQFs have improved communication between education and training systems and labour markets.

- All countries found it difficult to involve employers in designing qualifications, and even more difficult to involve trade unions. Employers tended to see the frameworks as something coming from educational institutions, and educational institutions tended to see frameworks as coming from industry.

- Less ambitious frameworks seemed to achieve more. Building capacity of educational institutions, and building the capacity of institutions which conduct research into labour market needs, are important areas for policy.

The most successful framework studied, the Scottish Credit and Qualifications Framework, had relatively limited ambitions and may also be the most difficult to replicate, because of the very long-term incremental policy reform process of which it was a part, and the relatively strong educational institutions in Scotland[175].

Also, McBride indicates that there is generally a lack of an empirical basis for supporting the expectations policy makers ascribe to NQFs. In his own words[176]: "Frameworks may be an appropriate basis for the lifelong learning society; but, given the state of current knowledge on their effectiveness, it is not possible to be definitive as to their benefits. National qualification frameworks are currently popular among education policy makers, but it is possible that a national qualification framework as a policy strategy may distract policy makers from problems in education that are more pressing than cross-sectoral integration and might introduce administrative complexities into education systems by centralizing their governance."

Related to this, according to Young, there is a danger of policy borrowing where early starter models of qualifications frameworks are replicated by less advanced countries[177]. These replications are not evoked by empirical evidence, but appear to be influenced more by the claims made about NQFs in other countries[178]. This criticism is also expressed in relation to referencing national qualifications, systems and frameworks to the EQF. Firstly, countries need to consider the extent to which they can preserve the coherence and integrity of their national education systems in a globalising world[179]. Secondly, the borrowing of EQF descriptors limits opportunities for stakeholders to discuss and truly understand specific national contexts and problems. This reduces the understanding,

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were based on fieldwork in Bangladesh, Botswana, Chile, Lithuania, Malaysia, Mauritius, Mexico, Russia, Sri Lanka, Tunisia, and Turkey.

[174] Allais, S., National Qualifications Frameworks: what's the evidence of success?, 2011. Only the most relevant conclusions are mentioned here, two other conclusions are more related to framework developments outsides Europe: "In nearly all of the countries with older qualifications frameworks, many qualifications had been developed, but never used"; "Qualifications policies are not enough to help countries break out of particular skills and labour market paths. Coordinated skills, labour market, and socioeconomic policies are needed. Focusing on particular sectors may be a useful first step."

[175] ILO, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, 2010.

[176] McBride, Vincent, Keevy, James, Is the national qualifications framework a broken promise? A dialogue, in: Journal of Educational Change (2010) 11:193–203, 2010.

[177] See Young, M.,National Qualifications Frameworks: Their feasibility for effective implementation in developing countries (Geneva, ILO), 2005; Chakroun, B, National Qualification Frameworks: from policy borrowing to policy learning, in: European Journal of Education, Vol. 45, No. 2, 2010, Part I, 2010.

[178] ILO, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, 2010.

[179] See: Holmes, K. (2003) Qualifications Frameworks: Issues, Problems and Possibilities for Small States, in: G. Donn & T. Davies (Eds) Promises and Problems for Commonwealth Qualifications Frameworks (London, Commonwealth Secretariat andWellington, New Zealand Qualifications Authority), 2003 Chakroun, B. & Jimeno Sicilia, E. (2009) TVET reforms in the Arab region: The 'push' and 'pull' in policy development, in: A. E. Mazawi & R. G. Sultana (Eds) Education and the Arab 'World', Political Projects, Struggles, and Geometries of Power (NewYork, Routledge), 2009. Both found in: Chakroun, B, National Qualification Frameworks: from policy borrowing to policy learning, in: European Journal of Education, Vol. 45, No. 2, 2010, Part I, 2010.

leadership and ownership of the NQF itself[180]. It is therefore questionable whether qualifications frameworks, also in Europe, are designed and developed on the basis of a specific national problem analysis and take into account the national culture and tradition. As a consequence, the impact of qualifications frameworks at a national level might be hampered by this.

4.2. Measuring the effectiveness of the EQF

Taking into account the critical reflections on qualifications frameworks, what can be learnt is that qualifications frameworks are not the 'holy grail' when it comes to developing fit for purpose national education systems and increasing stakeholders' (i.e. employers') involvement in the education systems. Too ambitious frameworks might run the risk of not providing sufficient evidence that they actually achieve something. Meta frameworks, such as the EQF, attempt to avoid many of the difficulties raised in the previous sections, by presenting a flexible and pragmatic design of the framework.[181] As a downside, the outcomes of such a framework might be even more difficult to evaluate. However, against the background of the above mentioned critical remarks, the outcome of the EQF will be assessed by examining three categories of outcome, namely: output, result and impact.

- The first category of **output** relates to what has been done and what are direct effects of the 2008 Recommendation, the preparatory work and the supporting initiatives (e.g. drawing up referencing reports, development of NQFs, and establishment of the EQF AG).

- The second category of **results** relates to what are achievements of the implementation (e.g. transparency of education systems, opening up of education systems).

- The third category of **impact** links back to the objectives the EQF pursues (e.g. increased lifelong learning and (labour) mobility).

The three categories will be discussed separately in the following sections.

4.3. Output of the implementation of the EQF

Outputs are direct, concrete consequences of an initiative. They include structures erected, reports drawn up, initiatives started and studies conducted. Within the context of an OMC it is essential that these tangible outputs are supported by all MS. As has been indicated in the previous Chapter, the 2008 Recommendation and the preparatory work caused many MS to review their education system and to develop an NQF. A lot of the tangible outcomes have already been discussed in the previous chapter and are summarised here below:

- **Designating NCPs and establishing the EQF AG**: National Coordination Points have been designated in all MS. All countries have appointed a person as member of the EQF AG. Until now, however, the role of the NCPs in many countries has been rather technical (e.g. in drawing up the referencing reports). In more advanced countries, the tasks of NCPs have become more diverse, since they are more involved in building ownership of the framework amongst different stakeholders, reference learning programmes, assess the quality of programmes and institutions.

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[180] Chakroun, B, National Qualification Frameworks: from policy borrowing to policy learning, in: European Journal of Education, Vol. 45, No. 2, 2010, Part I, 2010.
[181] ETF, Transnational qualifications frameworks, 2010.

- **Designing and implementing NQFs:** As Cedefop indicated, 34 countries in Europe are currently designing and implementing an NQF compared to 3 countries five years ago[182].

- **Drawing up referencing reports:** All countries are preparing referencing reports. Four countries have already finalised their report, another 12 will have finalised the report by 2011 and 19 countries will present their report at the EQF AG in 2012.

- **Publishing notes on the EQF, monitoring reports and studies:** As has been indicated, several notes have been drawn up by Cedefop and the Commission under supervision of the EQF AG to support MS in the implementation. Cedefop, on a yearly basis, monitors the progress in establishing NQFs in Europe; ETF monitors progress in relation to the developments of qualifications frameworks from an external perspective. In addition, at MS level, countries conduct studies and pilot projects to design, develop and implement NQFs and linking national frameworks or systems to the EQF.

- **Organising conferences, peer learning activities (PLAs):** Both at EU and MS level conferences, consultation rounds, working groups, meetings, Peer Learning Activities have been organised.

All in all, the EQF triggered a lot of activities concerning qualifications, qualifications frameworks and mapping education systems in Europe and elsewhere[183]. A common platform has been established to exchange views and perspectives on education policy in the MS and extensive reports have been, and are being produced both at MS level and EU level on qualifications frameworks and education systems in general. A severe hampering factor is that the deadlines, which are the two steps in referencing, will not be maintained and it is even questionable whether the second step will be completed at all.

4.4. Results of the implementation of the EQF

The results of an initiative are related to the intermediate objectives of the policy. The intermediate objective of the EQF is to increase transparency and comparability of education systems in Europe. Also, increasing permeability of different education sectors and differentiated learning pathways are mentioned as an aim for the implementation of the EQF. Results of the EQF implementation can be identified in relation to the following issues:

- **Increased use of the learning outcome approach:** As has been indicated in Chapter 3, the point of departure in 2008 in relation to the learning outcome approach differed between countries[184]. Currently, more countries are implementing the learning outcome approach in more education sectors. Hence, it is safe to say that with the introduction of the EQF, more and more qualifications are described in terms of learning outcomes. In addition to the quantitative assessment of the emergence of learning outcome approaches, ETF concluded that "there is no doubt that learning outcomes are clearly having an impact on the way in which recognition of qualifications is understood and are contributing directly to the development of new methodologies for recognition" [185]. Nonetheless, the ETF adds, "the extent to

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[182] Cedefop, National Qualifications Frameworks developments in Europe (October 2011) extract: executive summary, 2011.
[183] See ETF conference 'Qualifications frameworks: from concepts to implementation' on 6-7 October in Brussels.
[184] See Secton 3.2 and Cedefop, The Development of National Qualifications Frameworks in Europe 26 November 2008, 2008.
[185] ETF, Transnational qualifications frameworks, 2010.

which the learning outcomes approach contributes to recognition of qualifications in practice is however less certain at this stage of the EQF's development."[186]

- **Increased stakeholder involvement**: It is clear that the EQF led to more stakeholder involvement. At European level, stakeholders, such as the social partners, public employment services, the education sectors are members of the EQF AG and discuss the topics at hand on an equal footing with the MS, Also, their opinion is heard and valued in consultation rounds and conferences. At MS level, the stakeholder involvement increased in general, but not to a sufficient level. In particular, in many countries, it remains difficult to get the social partners committed to the development of an NQF and to the EQF implementation since they see it primarily as an education agenda and it is hence not always in their interest.

- **Increased international comparability of education systems**: The discussions during the EQF AG meeting indicate that very particular issues with regard to the situation in MS can be discussed on the basis of the referencing reports. This is an indication that there is a general understanding of the education systems in different MS. The EQF and the links between the EQF levels descriptors and the national framework and systems function indeed as a translation device and make education systems across borders better comparable. Moreover, since the whole process can be characterised by 'learning by doing' during the process, supported by the experience from the MS, the comparability increases, for instance concerning the criteria for referencing and the drafting of the referencing report.

- **Improved consistency of education systems**: The HE sector already had in place the three cycle structure together with the Dublin level descriptors. Between the Council of Europe and the European Commission a close cooperation is established to align the two different, but similar initiatives, in order to improve the cooperation between the HE and VET sector. At MS level, the positioning of individual qualifications lead to discussions on how to value qualifications awarded in different education sectors but having similar learning outcomes. These discussions deal with the overall comparability of different education sectors (e.g. general education vs. VET; VET vs. HE) and lead in some countries to reforms to avoid dead-ends in education sectors and improve routes for progression, including creating possibilities for switching education sectors. A challenge in many countries remains to include the non-formal sector, including the private sector, since the starting position of most countries was to first reference the formal sectors to the EQF/NQF and only when this process is completed, to take into consideration non-formal and even informal learning.

- **Apply principles of quality assurance**: At European level the different European tools concerning quality assurance can be better linked together to increase the impact. Also at MS level the existing quality assurance procedures are only partially taking into account the learning outcome approach. A critical emerging issue is how to assure quality in the way in which learning outcomes are defined and applied[187].

- **Promote the validation of non-formal and informal learning**: The use of the learning outcome approach potentially provides an impetus for having validated skills and competences acquired elsewhere through non-formal and informal learning. Although this is recognised by most MS, the EQF has not yet resulted in improved systems and procedures for validation. At EU level more emphasis on this issue is foreseen in spring 2012.

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[186] ETF, Transnational qualifications frameworks, 2010.
[187] Cedefop, National Qualifications Frameworks developments in Europe (October 2011) extract: executive summary, 2011.

All in all, the results yielded by the EQF are considerable for all issues discussed. In any case there is more of a learning outcome approach, more stakeholder involvement, increased comparability and improved consistency than could be expected if the EQF had not been implemented. However, there are serious gaps in the results, since for all issues it is true that progress could, and maybe should, have been greater. Especially, to keep pace with the two deadlines set in the Recommendation, it can be concluded that at this moment (one year before the second deadline will be passed), insufficient progress has been made with regard to the learning outcome approach, the involvement of social partners at national level, quality assurance procedures and validation of non-formal and informal learning.

Progress has been made, but the gaps mentioned, seriously jeopardise in the end the whole implementation since they diminish the mutual trust and the impact of the EQF in four ways. Firstly, when learning outcomes are not used sufficiently, the qualifications will be less comparable. Secondly, when social partners are not involved enough, the frameworks will never be trusted by employers for labour market purposes. Thirdly, when quality assurance is not in place the value of qualifications is not guaranteed. Finally, if the setting up of validation procedures is not taken up sufficiently, alternative learning pathways do not receive an equal opportunity and hence, the impact on lifelong learning will be limited.

4.5. Impact of the implementation of the EQF

The impact of an initiative relates back directly to the key objectives of the initiative. The EQF is a translation device between national qualifications systems and aims at promoting both lifelong learning and equal opportunities in the knowledge-based society, as well as further integrating the European labour market[188]. Hence, it aims at increasing labour mobility and lifelong learning. Increasing the transparency in qualifications and educational systems, making qualifications more readable and understandable across different countries would be a means to stimulate lifelong learning and mobility to mitigate the current and future European challenges[189]. The objectives of NQFs focus predominantly on educational issues, opposed to increasing labour market mobility. Promoting lifelong learning is considered to be a key objective of NQFs in Europe[190].

In this section the impact of the implementation of the EQF on the final objectives of the Recommendation will be assessed. Firstly, the impact on the education system and in particular on the participation in lifelong learning is discussed. Secondly, the impact on the labour market and in particular on labour mobility is assessed.

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[188] OJ C 111/1 Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (2008/C 111/01), 6.5.2008.

[189] European Commission, Commission Staff Working Document Towards A European Qualifications Framework For Lifelong Learning, Brussels, 8.7.2005 SEC(2005) 957, 2005.

[190] Cedefop, National Qualifications Frameworks developments in Europe (October 2011) extract: executive summary, 2011.

4.5.1. Impact on the education sector: lifelong learning

According to Eurostat statistics (Labour Force Survey)[191], the percentage of the population in the age group 18-64 participating in lifelong learning diminished between 2004 and 2010 with 1.2 percent (EU 27). In twelve MS the participation decreased by more than 1 percent (in the UK it even decreased by 16.7 percent). In nine MS the participation remained at a similar level and in six MS the participation increased by more than 1 percent (In DK it increased by 6.5 percent).

It is difficult to establish a direct link between the development of the EQF and NQFs and lifelong learning statistics, but in the short term the implementation has not yet led to increased levels of lifelong learning measured by the LFS. Even in countries that are well advanced in the development of an NQF, the lifelong learning participation does not seem to increase (UK: -16.7 percent; FR: -1.6 percent; IE: -2.6 percent and MT: +1.2 percent). On the other hand, it is unrealistic to even expect impact on this indicator to appear that soon, also given the fact that participation in lifelong learning is very dependent on other external, macro-economic developments as well. Even more, the conclusion that participation according to the Labour Force Survey is decreasing, can be an argument to invest in improving education systems to build 'a new education order', based on the concept of lifelong learning[192].

Although statistics do not record an increase in the participation in lifelong learning, still in some countries positive developments can be identified with regard to changing structures and developments that are expected to stimulate lifelong learning in the future. In order to shed some light on concrete impacts on changes in education systems towards a more lifelong learning oriented system, in the box below the situation in a number of countries is examined. Below the box, the discussion on whether the EQF resulted in impact on lifelong learning is continued.

Box: Impact on education systems and lifelong learning

> **IT**: It remains questionable whether the Italian education sector has gained more transparency due to the EQF until this moment. The implementation so far has been a technical procedure which needs to receive a follow-up in the form of establishing, together with stakeholders, social partners, citizens and the Regions, a national qualifications framework. Furthermore, real debates between HE and VET, formal and non-formal education sectors have not yet taken place and hence there is not yet felt an urgent need for reform. Impact on participation in lifelong learning is hence unlikely.

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[191] Eurostat statistics: http://epp.eurostat.ec.europa.eu/portal/page/portal/education/data/database: trng_LFS_01 Abstracted 3-1-2012. The reliability of the statistics on lifelong learning can be questioned to some extend. Since the results of the Labour force survey are stable over the years, despite some breaks in the data series, the reliability is not hampered for statistical reasons, but there is concern that the questions asked, and the concepts used are not always used in the same way throughout the countries. There are cultural differences causing diverging participation rates. Country differences are dependent on definitions and concepts used in relation to learning. For instance, in some countries, mainly the New Member States, education and training for adults are rooted in the formal system (schooling) both by the structure of institutions, policy and awareness of potentially learners causing, neglecting non-formal learning as being learning in the strict sense at all. In other countries, for instance the Anglo-Saxon countries and the Netherlands, adult learning is primarily seen as related to employment and in-service training, having possible an effect on participation rates when it comes to including adult learning for the own interest and other non-vocational learning. Furthermore, the Luxembourg sources indicate that the statistics are not applicable for Luxembourg due to its specific situation with regard to the high number of frontier workers. Although these contextual differences exist, it is very hard to assess what the impact is of these different conceptualisations on the participation rate. See: Broek, S.D., Buiskool, B.J., Hake, B, Assessment of the impact of ongoing reforms in education and training on adult learning sector, 2011.

[192] Field, John, Lifelong Learning and the new educational order, 2006.

NL: The introduction of the EQF is not meant to have major impact on the education system. It is taken to be just a new description of the system. It can have impact in the non-formal learning and private sector, but at this stage, it is not quite clear how large this effect will be, since it depends on the referencing process of the non-formal sector and the private sector to the Dutch NQF (NLQF), which has not taken place yet. If the approach taken so far stays the same, meaning somewhat protective of the formal sector, the non-formal education and private sector might not have a really fair chance to get referenced to the NLQF in a proper way. The NCP is independently positioned at distance from the formal sector, also in order to prevent such a situation, but the threshold of 400 hours learning effort might in the long term turn out to be a barrier.

PL: In Poland the EQF has already had major effects on the educational system as a whole. The shift to learning outcomes has and will further change formal education, as well as improve the quality assurance system. Also, Poland is making serious plans for including non-formal and informal learning in the framework to increase permeability and transparency. At this stage it is not clear what the actual effect of the PQF (and EQF) on lifelong learning will be. It will take at least ten years to see the influence on society. However, only a very small percentage of the adults are involved in lifelong learning and this is considered to be one of the major challenges for the Polish education system. It is expected that the PQF will support the development of lifelong learning by providing at least more transparency to learning pathways. Other expectations of the effect of the PQF on lifelong learning are that as a result of the focus on learning outcomes and the improvement of the quality assurance system, the trust in the educational system as a whole will increase.

AT: The EQF will have an impact on the educational sector, since it will lead to new curricula based on the learning outcomes approach. This provides the opportunity for especially the VET sector to improve its image, also in an international perspective. Although the VET sector is a large and influential sector, in Austria the higher vocational qualifications can be positioned at the same levels of higher education qualifications, but they were not recognised as such, also because of the mixture of formal and non-formal education (work-based learning) constituting these higher vocational qualifications. Once the EQF is implemented, the national and international recognition of Austrian qualifications might be better and make VET more attractive. Also, the NQF could provide more transparency of the sector and between different levels of qualifications. Eventually, this may lead to increased participation in lifelong learning. The impact of the EQF/NQF on other education sectors might be smaller. For instance the HE sector has already implemented the three cycle structure of the QF EHEA.

SE: As the NQF has not been practically implemented as yet, no major changes in education and training systems have occurred so far. Furthermore, stakeholders indicate not to expect the implementation of the NQF (and EQF) to have any major effects on the education and training systems. The learning outcomes approach, due to various reforms carried out since the 1980s, is firmly rooted within the Swedish formal education system. Similarly, the role of adult and popular education in general is already very strong, and Sweden consistently scores high in all international comparisons on adult and lifelong learning[193]. In these respects, there is not much to gain from the EQF and NQF.

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[193] Cedefop, National qualifications frameworks development in Europe, 2011.

UK: Stakeholders expect the impact of the EQF in the educational sector will be very minimal. *"In Scotland, we have had a framework for 10 years. It is utilised by every section of our education and training system. All we're doing is trying to find out how to add the EQF-message to that. But EQF will not have a major impact. We already went through all those transformations years ago."*

The evaluation of the Scottish framework in 2005 found the following conclusions:

- The level of knowledge and understanding of the SCQF relates to the extent to which people are involved in using the framework. Knowledge and understanding of the Framework is high within the FE and HE sectors among those who have made use of it, but limited among general staff. There are some examples of positive involvement with the Framework amongst other stakeholder groups, but knowledge and understanding is more limited than that in the FE and HE sectors, and this is associated with limited involvement with, and use of, the Framework. It was also noted that while SCQF could be useful in enabling employers to understand the qualifications system, few have so far seen it as being important for them or engaged with it. As a result their knowledge and understanding of the Framework is limited.
- The perception of the impact of the SCQF in both FE and HE is that its value has been in building on helping to enhance provision and clarify structures. Stakeholders from other sectors also expressed the expectation that SCQF would help clarify pathways and progression, create new opportunities for learners and greater cohesion in provision. There was an expectation from stakeholders in sectors such as community based learning and vocational and work based training that the framework could assist with the recognition of learning, and the creation of more opportunities for credit transfer. However, these optimistic perceptions and expectations were balanced by the view that progress towards introducing change had been slow, the impact so far had been limited in many areas, and there was some scepticism about the extent to which expectations for greater flexibility within lifelong learning provision would be achieved.
- Within the HE sector the SCQF has been described as impacting upon curriculum development and review, validation, admissions arrangements and programme planning. In the FE sector, it is recognized that while SCQF has facilitated changes associated with mapping of provision, and planning of provision and progression, its impact has been more limited because curriculum development takes place largely under the auspices of SQA (Scottish Qualifications Authority).
- With regard to vocational and work-based qualifications there was little evidence of progress. This was partly associated with the attempts to undertake these developments in a UK context, but the failure to secure progress was leading to a degree of frustration among employers and those involved with vocational training. Opportunities for developments in the field of community based learning have been welcomed, although limited progress has so far been made, and the scale and complexity of the tasks involved have been noted.
- Issues for future attention: Employers and work-related learning: to examine more fully the issues associated with including work-based and work-related learning within SCQF and ensuring greater employee and employer involvement with the Framework.

The results of the evaluation have been used as a means of increasing the impact of the SCQF. It has, for example, since been recognised that the ultimate recipients of the framework – employers – should be more directly involved in the framework. Also, the framework recently opened up more clearly to non-formal and informal learning and education.

DE: As the DQR has not been practically implemented as yet, no major changes in education and training systems have occurred so far. However, it is expected that the DQR, at least to a certain extent, will work for the opening up of the HE-sector to both VET and the labour market, thereby increasing the permeability of the education and training system.

From the country information on the impact on education sector and lifelong learning, it can be concluded that the impact so far is very modest. Most countries expect an impact on lifelong learning, but this cannot be made concrete and it is too early to provide evidence. Expectations include that the framework will lead to more transparency, permeability, opening the education sector, improving the image of VET, better linking HE and the VET sector etc.

The Italian situation is a clear example of a country where impact can not be expected yet. Also in Germany, since the framework is not yet implemented, impact cannot be expected. In Sweden, impact on lifelong learning is not expected in the short term and many principles (i.e. the learning outcome approach) have been implemented in earlier reforms. The Dutch description focuses on the issue that the implementation of the Dutch NQF is rather attuned to the formal education sector and that therefore impact on lifelong learning can only be expected when the non-formal and private providers ask for referencing their programmes to the NQF. From Poland, it can be learnt that effects of major education reforms cannot be measured after a short period. It is estimated that it will take ten years before impact on lifelong learning can be assessed. In Austria, the impact on lifelong learning is mainly expected in the VET sector, through increased status and transparency of the sector.

In Scotland, the impact of the EQF is regarded as very limited; the impact of the ten year old Scottish Qualifications and Credit Framework on developing the education system can be identified, but even with regard to the most advanced framework in Europe, it is not clear whether there is a direct impact on lifelong learning. One of the main impacts, besides making the systems more transparent, is that curricula and programme development have been changed due to the framework. The evaluation of 2005 made clear that there is indeed a greater consistency of the education system, that non-formal learning is better related and integrated in the system, but no mentioning has been of increased levels of lifelong learning. What can be learnt from the developments of the Scottish framework is that impact can only be expected long after the initial implementation. Also, since the implementation of the framework is a continuous process, continuous monitoring, evaluation and improvement need to take place to achieve the desired impact.

What can be seen is that countries that have had a learning outcome oriented education sector for years (e.g. SE and NL), are amongst the highest scoring countries with regard to the participation in lifelong learning (see Labour Force Survey). This is an indication that the EQF will finally impact lifelong learning through the implementation of the learning outcome approach in defining qualifications.

4.5.2. Impact on the labour market: labour mobility

The impact on the labour market and more specifically on labour mobility is at this moment difficult to assess. There is no statistical or other kind of data at hand to assess developments on this issue, and even if there were data available, it would be difficult to link developments in labour mobility directly to the EQF. To have a better - qualitative - perspective on the impact on the labour market and labour mobility, in the box below the situation is described for seven countries.

Box: Impact on the labour market

IT: Labour mobility between regions is seriously hampered due to the fact that qualifications awarded in some regions are not always recognised in other regions. An NQF could be a tool to start the discussion on this issue between the stakeholders at rtate level, at region level and also between state and regions.

NL: The impact of the EQF on the labour market is at this stage not quite clear, but it is assumed that the Dutch NQF can contribute to validating prior learning and, through this, to labour mobility (between companies, between sectors and between countries). In the financial sector, the structure of the NLQF was already tested. One of the results of the testing phase was that it appeared to be easier to recognise the value of an internal training of one bank by the other. This made a transfer of a large group of employees easier, as there was no need to train the employee again after the take-over. Another example of where the NLQF and EQF can have an impact on learning and labour mobility is the army: employees in the army get a specific training, the value of which is at the moment not known to employers outside the army. The NLQF has the potential to change that.

PL: Concerning labour mobility, it is likely that the PQF will bring about more national mobility, since when validation measures and recognition of non-formal qualifications are in place (as is foreseen in the implementation of the PQF), it will be easier to change jobs. In addition, concerning international labour mobility, it is mentioned that it does not only depend on the recognition of qualifications, also other, more important, barriers play a significant role, for example language difficulties[194].

AT: Concerning labour mobility, a better and more transparent positioning of the VET sector due to the EQF and Austrian NQF could provide a basis for more national and international labour mobility. Due to its specific dual system, the educational system of Austria is internationally often not well-understood. Apprenticeship and work-based learning are inherent parts of all VET qualifications, including the qualifications for skilled workers at advanced levels. The input-based ISCED[195] rates this at a lower level (also other countries often rate this at a lower level) and hence, Austrian VET qualifications seems to be undervalued. The hope is that, with the referencing of these qualifications to the appropriate EQF levels, this will improve.

SE: Current activities and thinking on the framework have so far to a large extent been dedicated towards the design and scope of the framework, along with paving the way for a smooth implementation. As a result, there so far does not seem to have been sufficient time or space to anticipate the possible and desired impact on the labour market in a profound and structured manner. Nevertheless, labour market-oriented stakeholders do have certain, albeit somewhat rudimentary, expectations of the framework's impact on the labour market. The framework could, for example, contribute to labour mobility in validating non-formal and informal learning. As the framework is essentially based upon what someone can do, rather than formal diplomas and certificates, it could enable people lacking formal qualifications to move on both horizontally and vertically. Furthermore, all stakeholders see the potential benefit of the framework in an international respect. For foreign workers in particular, referencing their qualifications to the EQF should make it easier to find a job in Sweden that meets their knowledge, skills and competences.

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[194] See also: Dębowski, H., Chłoń-Domińczak, A., Lechowicz, E., Trawińska-Konador, K., Sławiński, S. Report of the debate, 2011.
[195] ISCED : International Standard Classification of Education:
http://www.unesco.org/education/information/nfsunesco/doc/isced_1997.htm

UK: Evidence of direct impact on objectives such as increased access and transfer is limited. However, the SCQF is associated with positive developments in access, progression, and transfer, i.e. lifelong learning[196]. Recently, an employers-toolkit has been developed to use SCQF level descriptors to develop job descriptions, performance appraisals, training needs analyses and workforce development strategies. This would enable employers to use the SCQF in their HR-strategies. There is anecdotal evidence that some employers now refer to the SCQF levels in their job adverts. In the public sector, specific examples indicate how the SCQF contributed to labour mobility:

- *Mobility within the same section of the public sector*. In the health-service, non-medical staff working for the health-boards previously were expected to re-gain all required qualifications, regardless of the qualifications they already gained elsewhere, when starting to work for another health-board. Drawing on the SCQF, the health service now decided to formulate pan-Scottish requirements, using the SCQF level descriptors. This enables workers to move from one health-board to another without having to start all over again in terms of gaining qualifications.

- *Mobility between different sections of the public sector*. Amongst public sector employers, the SCQF is widely known, used and accepted. This means that if a prison officer gained the compulsory national vocational qualification (SCQF level 2) and would then subsequently leave the prison service to join the police, that qualification would be fully recognised by his new employer. The SCQF provides the recipient employer with the means to translate this qualification to the applicable sectoral occupation standard.

- *Public-private sector mobility*. An example originating in the police force clarifies how the SCQF could contribute to public-private sector mobility. Many police officers leave the police-force at a relatively young age (around 50). Although the police force provides its employees with extensive training and education, these internal qualifications are not always automatically known or recognised by employers outside the public sector. For ex-police officers, it proved to be difficult to quantify the training they received. In order to make it easier for ex-employees to communicate about their skills and experience, the police force started using the SCQF. Now, all employees leaving the police force receive a printed profile giving an overview of the training undertaken and the SCQF level and credit value this training represents. Employees are advised to present themselves as having these skills and experience. According to the HR-department, this is very beneficial in finding a new job at a level matching the skills, experience and qualifications.

However, much work needs to be done in order for the SCQF to fulfil its full potential. The most important challenge in the near future is to enhance the awareness and use of the SCQF, particularly amongst private-sector employers.

DE: As the implementation of the DQR has not been finalised yet, it is difficult to anticipate on its possible impact on the labour market. Nevertheless, the social partners expect the DQR, by stressing the equivalence of VET to general education and HE, to enhance the status of VET on the labour market. Employers argue that, although many vocational qualifications represent a high level of skills, knowledge and competence, it is not always transparent that certain vocational qualifications are equivalent to HE-originated qualifications. By making this equivalence visible in the DQR, employers could gain access to a new reserve of highly qualified workers outside the domain of HE, thereby making better use of their workers' potential. For employees in possession of these qualifications, this would enhance their position on the labour market, giving access to higher-qualified, and possibly also better-paid, jobs.

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[196] ILO, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, 2010.

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What can be concluded from the country information on the impact on the labour market and labour mobility is that it is indeed too early to tell what the impact is. In Italy, no impact has been recorded yet, but it is assumed that the NQF will stimulate recognition of qualifications across regional borders. The NQF on the labour market is in the first place contributing to labour mobility within the country. Within the Polish case, impact is still being assumed, since the framework is not yet in place. Concerning international mobility, language difficulties are mentioned as a more severe barrier. As in Poland, in Sweden the implementation is still in an initial phase, hence impact is not yet expected.

If there is any evidence of labour mobility, it is only anecdotal. For instance, in the Netherlands, there is anecdotal evidence that the level descriptors of the NQF (and hence the EQF) contributed to validation processes and labour mobility between companies and sectors. The NLQF levels are used for mapping competences of bank employees during a take-over. Or in Scotland, where for instance non-medical staff in health-services, can make use of pan-Scottish requirements, based on the SCQF level descriptors.

More insights on possible impacts of qualifications frameworks can be found in the UK (Scot). Due to the fact that this framework has existed for more than a decade and was evaluated in 2005, it can be learnt that the framework contributed to various types of labour mobility (within a sector, between different sectors, between public and private sectors). Also in Scotland there is some evidence that employers increasingly are using the SCQF levels in their job ads.

In Austria and Germany, it is assumed that the NQF will contribute to the improved image and status of the VET sector, however, the NQF is not yet implemented, so impact can not yet be recorded.

In general the impact of the EQF and subsequently the NQFs at national level, is more felt (or expected to be felt) in the VET sector than the HE sector. For the HE sector, the impact is expected to be limited, since there is already a lot of learning and labour mobility at these levels, due to the Bologna process (see for instance in AT). Related to this, there is only anecdotal evidence that the impact is being expected to be higher for the low and medium skilled workers than for the high skilled workers. Highly skilled workers are expected to find their own ways in being mobile. For instance in Sweden it is mentioned that the framework would mainly be beneficial for medium and low qualified workers who do have the experience but lack the certificates and diplomas to back it up. These workers often have difficulties to get their level of knowledge, skills and competences recognized, and the framework could provide them with the means to make these visible and tangible. Highly qualified workers often do have the certificates and diplomas to back up their level of knowledge, skills and competences anyway, so they do not have as much to gain from the framework. Furthermore, although not widely recorded yet, non-formal learning can, by means of validation procedures, be boosted (see for instance in NL, SE). There is a general concern that impact will be minimal if employers will not be engaged and are willing to use it.

Concerning international mobility, it is expected that the frameworks contribute to easier recognition of qualifications. Although evidence is lacking at this moment, there are indications that in the UK and Ireland, there is a lot of interest in brochures explaining and making comparable the different national frameworks (Scotland; England, Wales and Northern Ireland and Ireland). Between these countries however, mobility is not hampered by linguistic barriers, which are still important obstacles for people to work abroad.

4.6.   Concluding remarks

The impact question is at this stage of the implementation of the EQF difficult to answer. In addition, within the EQF project, there is insufficient evidence either to oppose or to support the critical remarks made in the literature. Since it is too early to assess real impact, both critics and proponents arguing on the impact have difficulties finding empirical support for their claims. The criticism that newly developed frameworks are replicated from early starter models or the EQF itself, seems reasonable for some countries, however it has to be mentioned that these frameworks undergo a serious transformation to be applicable in the national context. Also, the critique that borrowing the EQF level descriptors for the national context limits the stakeholder involvement can not be verified, as in many countries the level descriptors are developed on the basis of own national terminology, cultures and traditions.

The critical accounts point rightfully to the fact that there is a lack of evidence on the effects of designing, developing and implementing qualifications frameworks. If there is any empirical evidence, it is derived from the first general frameworks (South Africa, UK, New Zealand), but it is questionable to use the flaws in these frameworks to criticise later generations of frameworks. As is expressed by Bjornavold and Coles: "Modern NQFs potentially go beyond the role of classifiers ('qualification grids') and aim at a redefinition of the way qualifications are related to each other, how they are valued and eventually put into use in our societies. Modern NQFs can thus be described as 'instruments with a vision' questioning current education and training practices and challenging existing professional and sectoral interests. Designing an NQF is thus something more than agreeing on a set of technical features (NQFs understood as a grid of levels and descriptors), it is about creating a platform for (cross-institutional and cross-sectoral) dialogue and – eventually – mutual trust"[197].

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[197] Bjornavold, Jens, Coles, Mike, The added value of NQFs in implementing the EQF, 2009.

5.   CONCLUSIONS AND RECOMMENDATIONS

The previous chapters included a description of the relevance, implementation and effectiveness of the implementation of the EQF Recommendation. This final chapter, based on the previous chapters, include the most important conclusions drawn (section 5.1) and provides recommendations for the current implementation period and for a potential renewal of the mandate (section 5.2).

5.1.   Conclusions

This section describes the most important conclusions coming out of the previous chapters and addresses some important challenges, setting the scene for the recommendations as included in section 5.2.

5.1.1.   The implementation is rather successful …

Implementing the EQF Recommendation is a prestigious, comprehensive and challenging EU wide project, requiring a lot of commitment of stakeholders at EU and national level. Judging the relevance, implementation and first outcomes of this project, one can conclude that according to the six conditions for a successful OMC (i.e. preparatory (political) involvement; common concern; high level of institutionalisation; availability of specific objectives, benchmarks and indicators; involvement and cooperation of stakeholders; and presence of conflict between MS with incentive or reluctance to act), the implementation of the EQF recommendation can be considered to be an example of a successful OMC. To mention the most important success factors of the EQF implementation:

- The EQF fits well within the European strategic objectives and respects the principle of subsidiarity. The concepts and terminology used are clear and flexible enough for MS to develop their own system related to the EQF.

- The 2008 Recommendation had a long preparatory history involving various groups of stakeholders.

- MS voluntarily agreed to initiate the implementation of the EQF and in many cases the development of an own NQF. Also, in a substantial number of countries the EQF evoked reforms of and within the education system.

- The deadlines which have been set ambitiously, will not be reached, but urged the MS to take action.

- The EQF AG provides a solid platform for the exchange of ideas, peer pressure and discussion to solve problems MS face when dealing with the EQF.

- As a result of learning by doing, clear guidelines (for instance on referencing) are developed to support MS in their work. Hence, knowledge concerning the whole process is available to a wider public.

- Annual monitoring, benchmarking and comparisons between MS create an incentive for MS to continue their work and to learn from others.

- At MS level in some countries mutual ownership of the NQF has been established. Some of the critical factors of achieving this are: long history, broad stakeholder involvement and coordination of the framework at distance from governmental organisations.

Nevertheless, some serious challenges could be identified, as described in the following subsection.

5.1.2. …but current and future challenges remain

Although the implementation of the OMC in the field of EQF could be considered as relatively successful, some serious challenges can be identified that could be a threat to the full and trustworthy implementation of the EQF.

- **Insufficient and incomplete implementation of the learning outcome approach in many countries**. The learning outcomes approach has been integrated in most European MS to describe their qualifications. However, till this moment, insufficient attention has been given to the practical issue of how learning outcomes are applied in awarding qualifications, assessing whether someone has the required knowledge, skills and competences. In most countries the radical transformation from input driven to outcome driven definition of qualifications has still not taken place. Qualifications are still regarded as the result of a learning programme with a specific duration and in a specific institute. The learning outcomes are regarded as 'equivalent' to what people can after having finalised a certain education programme. Hence, increased efforts need to be made to have a better insight into what learning outcomes actually mean in practical terms and how teachers, education institutions, quality assurance institutions, employers and individuals can work with this approach.

- **Difficulties to engage stakeholders outside the formal education sector and more specifically, final beneficiaries (social partners and citizens)**. The key objective of the EQF is to facilitate labour mobility. The EQF is therefore not solely an education reform agenda, but an agenda impacting the labour market as well. However, at this moment, the EQF is still too much considered to be an education policy, falling under the responsibility of the educational sector. Hence, the labour market side is not sufficiently engaged to ensure that the objectives will be reached and the dialogue between education and labour market side stakeholders is ensured. At MS level this difficulty is most pressing. It appears to be difficult to have employers and employees truly involved in the process (there is hesitation from both sides), but also at EU level, certain stakeholders could have been engaged earlier and more intensely in the process. This applies for instance to DG EMPL (also concerning the establishment of the ESCO taxonomy) and DG MARKT (concerning the professional qualifications Directive 2005/36). In general it can be said that the terminology used such as 'qualification' and 'learning outcome' appeal more to the education side than the labour market side. The eight levels of the EQF describe levels on which qualifications can be positioned, but for the labour market side, it would be more useful to use the levels to determine the level on which employees function, even when they have not received a qualification at that specific level. In that way the levels determine general levels of competence (in terms of knowledge, skills and attitudes). It would be food for thought to change the EQF into a European Competence Framework, or that the EQF would be flanked by another framework in which, in a similar manner, competence levels are described.

- **Until this moment insufficient attention has been given to underpin qualifications frameworks and systems with transparent procedures for assuring the quality**. Especially, the way in which quality assurance systems need to deal with the learning outcome approach has not yet been addressed sufficiently. This creates uncertainty about the quality of qualifications and whether they truly are described in terms of learning outcomes. The learning outcome approach will impact on the way quality is assured in all education sectors. In general it entails more involvement of stakeholders in assessing the quality of programmes, procedures to assure quality of assessment and validation procedures, changing

teacher competences and dealing with diversity in learning paths. Reforms to deal with the learning outcome approach in quality assurance systems in the MS in general are insufficiently being implemented. Moreover, although the recommendation refers to that common principles for quality assurance should underpin the implementation of the EQF, countries differ strongly in how they apply quality assurance.. No evidence was found that this diversity in quality assurance is hampering the process for the moment. However, also given the broader ET2020 framework, quality assurance should receive continuous attention and should be reflected in national quality systems in order to make sure that referencing is reliable.

- **Lack of established validation procedures for non-formal and informal learning**. Related to the learning outcome approach, qualifications will become less attached to specific learning pathways. Non formal and informal learning can lead to partially or fully receiving a qualification at a particular EQF level. However, in order to ensure this, clear validation procedures need to be in place. Although some countries have been working on this issue for years, and have established procedures or even legal rights to validate their work and learning experience, overall still insufficient progress has been made to really provide trustworthy alternatives for formal learning pathways. In many countries, validation for non-formal and informal learning is still not yet in place. Although this does not affect the implementation of the EQF and development of NQF directly, it affects the openness of national systems and frameworks for other learning pathways.

Alongside the principal barriers mentioned, there are also a number of particular technical issues which MS and the European Commission are confronted with:

- **Positioning of the school leaving certificate giving access to higher education**. In some MS (NL, AT and DE), there have been, and still are debates on whether to position this qualification at level 4 or 5. Most MS position this qualification at level 4. The problem with having this particular qualification at different levels is that it is agreed that school leaving certificates give access to higher education in all MS. If they are positioned at different levels, additional courses might be required for students accessing higher education in countries where the school leaving certificate is valued higher (in terms of learning outcomes). The problem is not so much with the EQF as such, but with harmonisation tendencies within the European Higher Education Area. It is assumed that school leaving certificates are similar and rights have been attributed to them, but with the notion that school leaving certificates differ per country in terms of learning outcomes.

- **The dispute between VET and HE sector**. While at EU level there is close cooperation between the EQF and QF EHEA, at MS level, conflicts remain concerning opening up the higher EQF levels 6, 7 and 8 for non academic, mostly VET, qualifications. In many countries, since these levels are already reserved for the three cycles defined by the Dublin descriptors, a distinction is being made between the academic and vocational routes. In some countries, vocational qualifications do not exist at level 6, 7 and 8, establishing dead ends in the education system.

- **Referencing international qualifications**. The referencing of international qualifications is in a way a test case of how comparable NQFs are. The key question is whether qualifications would be positioned at the same EQF levels by all countries, without coordinated actions.

- **The future role of the non formal sector**. At this moment in many countries the referencing is based on the existing formal qualifications. Often, non formal and informal learning will only be taken into account after the formal sectors have been referenced. There is some danger that since the frameworks are more 'owned' by the formal sectors and less by the non formal sector and employers, the final frameworks will not be as open for alternative learning pathways as is envisaged. Also, there is evidence that in some countries input-related instead of learning outcome related criteria are used for allowing non-formal qualifications to be referenced.

The issue of the positioning of the school leaving certificate and the international qualifications, point towards an important question for the functioning of the EQF, namely: "*how much diversity is possible among European NQFs before the EQF loses its capacity to translate between them*"[198]. The learning outcome approach makes clear that qualifications should be compared according to their described learning outcomes. On the other hand, qualifications which might have different learning outcomes in different countries, entail the same rights (see school leaving certificate). In addition, one qualification leading to the same learning outcomes might be positioned at different levels in different countries. Hence, the issues described are in fact not a 'translation problem' and hence they are not in the strict sense a problem of the EQF, but they point to the fact that there are differences between qualifications, qualifications systems and frameworks in the MS.

All of the above mentioned issues could **endanger the full and trustworthy implementation** of the EQF. Nevertheless, one can conclude that the reference reports are improving over the years, in which MS are better explaining what their qualifications system is about and their procedures encountered for assuring transparency, coherency, and reliability, fostered by learning by doing, peer learning, peer pressure, and guidance by European level stakeholders (European Commission, and Cedefop). However, MS should keep working on further improving their reference reports in upcoming rounds, and integrating the learning outcomes approach, quality issues and recognition procedures. Especially, the current discussion on where to put the school leaving certificate in Germany is challenging, since it could undermine the whole process. During these moments the OMC is subject to severe test and needs to prove its resilience.

To increase the mutual trust, it is of the highest priority to have all stakeholders involved in the implementation. This can only fully be done by implementing the **second step in the referencing process**: indicating the level of the EQF at each new qualification. The MS have been and still are occupied with drawing up their referencing reports, which is indeed a time consuming activity, but they have not yet paid sufficient attention to the second step in the referencing process. The momentum for developing qualifications frameworks is there, but will soon be lost when the discussions only involve high level policy makers and well informed stakeholders and not the broader public. Therefore, completing the second step of referencing, initiating ground-level practical debates on the function and functioning of the EQF should be the primary objective in the coming year towards April 2013. It is by this second step that it will be possible for the EQF to start to make an impact, since only then it will be seen, used and discussed by the end-users.

In relation to the principal barriers mentioned, the second step can function as a 'flywheel' for boosting progress and reforms. On the one hand, the obstacles mentioned are a **cause** of the delay in relation to the second step (e.g. before the EQF indication can be made for

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[198] Raffe, David, National Qualifications Frameworks: European experiences and findings in an educational and an employment perspective, Forthcoming in Büchter, K., Dehnbostel, P. and Hanf, G. (eds) Der Deutsche Qualifikationsrahmen (DQR) - Ein Konzept zur Durchlässigkeit und Chancengleicheit im Bildungssystem? Bonn: BIBB, (Forthcoming).

individual qualifications, these qualifications need to be described in terms of learning outcomes; also, stakeholders, final beneficiaries are currently not asking for an EQF indication). But on the other hand, the obstacles will be maintained in the future **as a consequence** of not completing the second step of referencing. Not completing the second step will intensify even more the barriers encountered (e.g. also in the future, final beneficiaries will not ask for an EQF-tag).

To conclude, and to point to a way forward, in emphasising the strong points and focussing on the weaker elements of the EQF implementation and hence creating the right conditions for yielding impact, the outcomes of the implementation can be boosted in the future. Concerning the relation between the achievements of the implementation and the outcomes of the implementation, the current situation is that the EQF led to a high level of output, a medium level of results and a low level of impact. Because of this low level of impact, also in the long term, it is questionable whether momentum will be maintained to yield more outputs, results and finally impact. In the recommended situation, when the second step of referencing is being implemented it is expected that the output initially remains similar to the current situation; the result however, will increase and so will the impact in the short term, but even more so in the long term. It is furthermore expected that since the EQF is in the hands of the people it concerns, more debates on the function and functioning will arise, keeping the flywheel going, boosting output, results and impact a second time. The following figure illustrates this process, depicting both the current situation (Blue line) and the recommended situation (Green line).

Figure 3: **Schematic picture on the relationship between achievements and outcomes of the EQF implementation (current situation and recommended situation).**
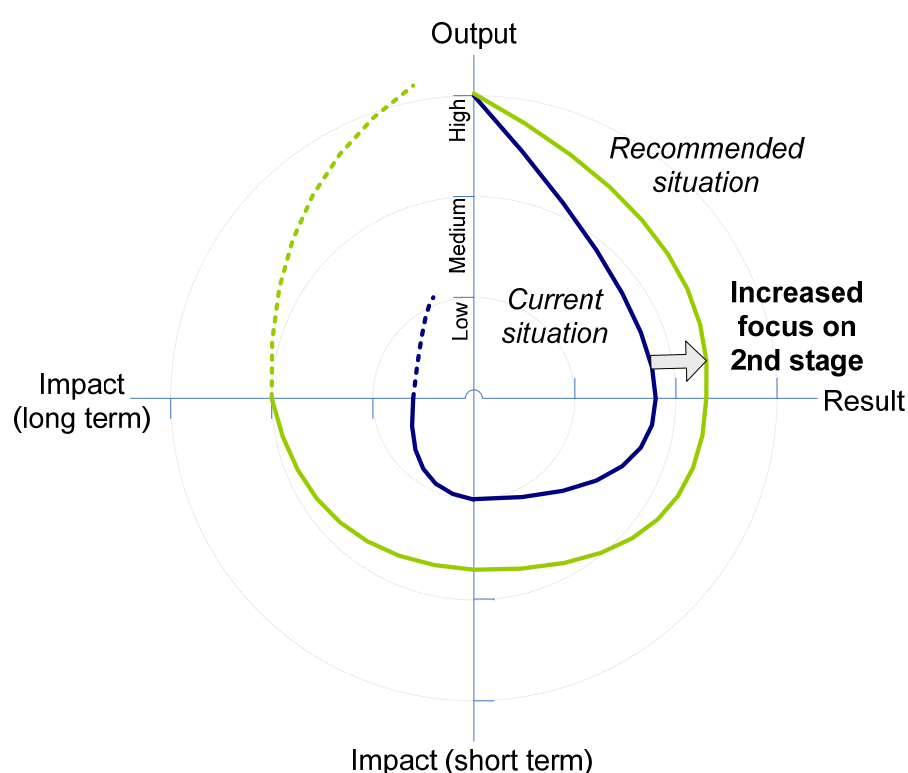
Source: Authors

In the next Section, the recommendations for action are discussed by which the EQF implementation could be further developed.

5.2. Recommendations

The following recommendations for further action can be presented to various stakeholders.

5.2.1. To the European Parliament, the European Commission and other European level institutions

- It is recommended to **continue the mandate** of the EQF AG after April 2013, given:

  - the relevance of the EQF implementation for the future European labour market and education system;

  - the global tendency to develop qualifications frameworks;

  - the efforts made at European and MS level to build mutual trust in each other's national qualifications framework or system and;

  - the output already generated and preventing that the process will come to a standstill.

- It is recommended that in the new period the EQF should become less an education agenda and **more a labour market driven agenda**, including a more intense dialogue between education and labour market stakeholders. This will not happen overnight, but in the remainder of the current period, substantial progress needs to be made in relation to the second step in referencing and mitigating the main barriers.

- The evaluation, which the EC has to conduct on the period 2008-2013 will have to include both **a retrospective**, **but even more importantly a prospective view** on how the EQF can be improved in its design and implementation to better relate to the labour market side and to have a higher impact on the ground. As a consequence, a careful assessment should be made of the main challenges identified in Section 5.1 (completing the second round, the need for new round of referencing reports, creating better involvement and ownership of stakeholders at national level, and making sure that the learning outcomes approach is better implemented, improving quality assurance, and applying well-established procedures for recognition of prior learning) and the present and future role of EU institutions in facilitating the implementation of the recommendation. In addition, the evaluation should address whether the mandate should be continued and in what way (aims, processes, systems, structures and stakeholders involved). Moreover, this evaluation should include a broad consultation amongst national stakeholders to assess their awareness, knowledge and attitude to the work done so far, in order to draw lessons on how the EQF could better touch the ground and how the communication of the EQF could be improved. Also the present and future role of NCPs should be assessed for identifying successful practices, and lessons to learn.

- It is recommended to **better make clear how the EQF contributes to the main objectives of EU2020 and ET2020** (lifelong learning and labour mobility), by more clearly defining intermediary objectives (such as implementing the learning outcome approach, developing quality systems, and developing validation procedures for non-formal and informal learning). In theory there is a clear link between the instrument and the key objectives, but in practice the causality is very difficult, or even impossible to determine or to be understood by stakeholders on the ground. The further introduction of more and better formulated intermediate objectives (transparency, comparability, involvement of final beneficiaries in the design of education programmes, numbers of validation procedures conducted etc.)

would make the intervention logic of the EQF stronger, outcomes would be easier to monitor and hence, the EC would have more instruments to guide the process by providing benchmarks (while respecting the subsidiarity principle).

- It is recommended at EU level to **increase the involvement of other DGs** (DG EMPL and DG MARKT) to support the shift from an educational agenda towards a more labour market driven agenda. The EQF is closely related to other policy areas within the EC. This has not been neglected in recent years, but cooperation could be improved.

- It is recommended to **further align European tools and initiatives**. This goes in two directions: alignment within DG EAC and alignment between DG EAC and other DGs. Within DG EAC, there are already initiatives to align European education tools better (e.g. ECVET, Europass, EQAVET, EQF, ESG etc.); however, emphasis on this can be increased to augment the transparency of European tools, especially for the social partners. Concerning the alignment with other DGS, firstly, it is recommended to promote the EQF levels and the learning outcome approach in recognition work of regulated professions (Professional Qualifications Directive 2005/36). Currently the draft amending proposal for this Directive only minimally refers to the EQF and maintains its five level structure of input related classification of education levels. This creates confusion on what kind of regime the European Commission adopts (outcome or input based), when it comes to recognition of qualifications. Secondly, it is recommended to align the EQF initiative and the ESCO initiative. There is some concern that the EQF and ESCO will not be consistent in terms of terminology. It should be investigated whether this would lead to confusion and difficulties in aligning the two initiatives.

5.2.2. To the EQF AG and the Member States

- It is recommended to **increase the focus on the second stage of referencing** (indicating the appropriate EQF level on each new qualification, certificate and Europass document). The impact of the EQF will increase, in the short term, but even more so in the long term, if the EQF is used by the final beneficiaries. It is therefore of the utmost importance that the second step of referencing is carried out.

- It is recommended to agree on **time lines** related to the second stage of referencing, draw up and distribute **guidelines** and finally **share experiences and good practices in relation to the second stage**. Some MS already have initiated measures and developed procedures, and these experiences should be used to develop common guidelines to support other MS in conducting the work. At EU level, PLAs could be organised on how this second step will have to be conducted. In addition, there could be an increased attention to monitoring and benchmarking from the Commission/Cedefop side on whether EQF levels are indicated on new awarded qualifications.

- It is recommended to **further develop and implement the learning outcome approach and appropriate validation procedures for non-formal and informal learning**. The learning outcome approach is the underlying principle of the EQF and entails the potential to bring the education side and the labour market side closer. However, it should be fully and in a trustworthy manner implemented in the MS. The future EQF Recommendation should build further on or refer to establishing validation procedures to stimulate the possibilities of alternative

learning pathways (also linking to the upcoming recommendation on validation of non formal and informal learning).

- It is recommended to build **learning outcome based quality assurance systems for all education sectors** and to investigate the possibility for one QA system. Currently, at EU level, only the higher education sector has fully established quality standards and guidelines and in the VET sector they are being developed and tested. Other education sectors lack solid quality assurance systems at EU level. Since qualifications can be regarded as a currency, it should be without doubt that this currency has value between MS and educational sectors, as well as between the education sector and the labour market. For this reason, improved and comparable quality assurance systems for VET, general education, higher education and adult education are needed to underpin the EQF. It should be investigated whether it is feasible to develop, in parallel to the EQF, one quality assurance framework for lifelong learning. This framework could on the one hand provide cross-sectoral descriptors and indicators to monitor quality of provision in all institutions where learning is provided (which is awarded with a diploma/certificate, a qualification) and on the other hand include sector specific characteristics.

5.2.3. To Member States and stakeholders at MS level

- It is recommended to increase **the involvement of the labour market stakeholders** to raise commitment and to create a feeling of ownership of the NQF/EQF from final beneficiaries (citizens, workers and employers) and finally, to stimulate the dialogue between education and labour market side stakeholders.

- It is recommended to **work on the second stage of referencing**: indicating the level of the EQF on each new qualification, and to initiate **ground-level practical debates** on the function and functioning of the EQF.

- It is recommended to increase **transparency how the levels are linked for final beneficiaries**, by better communicating the EQF to final beneficiaries. Referencing reports should not only be clear to well-informed policy makers and stakeholders (the EQF AG), but also to a broader public to establish trust in each other's qualification frameworks. As long as the links among qualifications from different countries are not clear to employers and employees, they will maintain hesitant to trust these qualifications. Therefore the EQF should be better promoted and it should be tested in practice whether final beneficiaries can work with the established links between countries' qualifications.

- It is recommended to further build **learning outcome based quality assurance systems for all education sectors** (investigating the possibility for one QA system).

- It is recommended to further **work on validation of non formal and informal learning**, and to position learning outside the formal education sector in the NQF.

ANNEX 1: EQF LEVELS

European Qualification Framework for lifelong learning, 8 levels

	Knowledge	Skills	Competence
Level 1	Basic general knowledge	Basic skills required to carry out simple tasks	Work or study under direct supervision in a structured context
Level 2	Basic factual knowledge of a field of work or study	Basic cognitive and practical skills required to use relevant information in order to carry out tasks and to solve routine problems using simple rules and tools	Work or study under supervision with some autonomy
Level 3	Knowledge of facts, principles, processes and general concepts, in a field of work or study.	A range of cognitive and practical skills required to accomplish tasks and solve problems by selecting and applying basic methods, tools, materials and information	Take responsibility for completion of tasks in work or study; adapt own behaviour to circumstances in solving problems
Level 4	Factual and theoretical knowledge in broad contexts within a field of work or study	A range of cognitive and practical skills required to generate solutions to specific problems in a field of work or study exercise self-management within the guidelines of work or study contexts that are usually predictable, but are subject to change	Supervise the routine work of others, taking some responsibility for the evaluation and improvement of work or study activities
Level 5*	Comprehensive, specialised, factual and theoretical knowledge within a field of work or study and an awareness of the boundaries of that knowledge	A comprehensive range of cognitive and practical skills required to develop creative solutions to abstract problems	Exercise management and supervision in contexts of work or study activities where there is unpredictable change; review and develop performance of self and others
Level 6**	Advanced knowledge of a field of work or study, involving a critical understanding of theories and principles	Advanced skills, demonstrating mastery and innovation, required to solve complex and unpredictable problems in a specialised field of work or study	Manage complex technical or professional activities or projects, taking responsibility for decision-making in unpredictable work or study contexts; take responsibility for managing professional development of individuals and groups
Level 7***	Highly specialised knowledge, some of which is at the forefront of knowledge in a field of work or study, as the basis for original thinking; Critical awareness of knowledge issues in a field and at the interface between different fields	Specialised problem-solving skills required in research and/or innovation in order to develop new knowledge and procedures and to integrate knowledge from different fields	Manage and transform work or study contexts that are complex, unpredictable and require new strategic approaches take responsibility for contributing to professional knowledge and practice and/or for reviewing the strategic performance of teams
Level 8****	Knowledge at the most advanced frontier of a field of	The most advanced and specialised skills and techniques, including synthesis and	Demonstrate substantial authority, innovation, autonomy, scholarly and

	work or study and at the interface between fields	evaluation, required to solve critical problems in research and/or innovation and to extend and redefine existing knowledge or professional practice	professional integrity and sustained commitment to the development of new ideas or processes at the forefront of work or study contexts including research.

* The descriptor for the higher education short cycle (within or linked to the first cycle), developed by the Joint Quality Initiative as part of the Bologna Process, corresponds to the learning outcomes for EQF level 5

** The descriptor for the first Bachelor cycle in the Framework for Qualifications of the European Higher Education Area corresponds to the learning outcomes for EQF level 6

*** The descriptor for the second Master cycle in the Framework for Qualifications of the European Higher Education Area corresponds to the learning outcomes for EQF level 7

**** The descriptor for the third Doctoral cycle in the Framework for Qualifications of the European Higher Education Area corresponds to the learning outcomes for EQF level 8

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ANNEX 3: LIST OF INTERVIEWEES

Name	Organisation	Date
EU level interviews		
Michael Young	Institute of Education University of London (UK)	November 3 2011
Gordon Clark	Former Head of Unit DG EAC, Independent consultant (IE)	November 7 2011
Arjen Deij	European Training Foundation (ETF), Senior advisor	November 10 2011
Liliane Volozinskis	European Association of Craft, Small and Medium-sized Enterprises (UEAPME), Director for Social Affairs and Training Policy (FR)	November 10 2011
Sjur Bergan	Education Department, Council of Europe, Head	November 15 2011
David Raffe	Centre for Ediucational Sociology, University of Edinburgh, Director (UK, Scot)	November 15 2011
Susanne Müller	BusinessEurope (Confederation of German Employers' Associations (BDA: Bundesvereinigung der Deutschen Arbeitgeberverbände), Adviser (DE)	November 17 2011
Mike Coles	Qualifications and Curricula Authority (QCDA)) (UK)	November 23 2011
Cinzia Sechi	European Trade Union Confederation (ETUC), policy advisor (IT)	November 29 2011
Jens Bjornavold	Cedefop (NO)	October 4 2011; December 16 2011
Anita Krems	European Commission (HU)	October 4 2011; December 15 2011
Carlo Scatoli	European Commission (IT)	October 4 2011
Jörg Markowitsch	3s Unternehmensberatung, Senior Partner (AT)	December 20 2011
The Netherlands		
Anneke Tjalma	Ministry of Education, Culture and Science (OCW)	November 29 2011
Marijke Dashorst	Till October 2011 Ministry of Education, Culture and Science (OCW)	November 9 2011
Pia Deveneijns	Association of VET colleges (MBO Raad), policy advisor	November 24 2011
Gertrud van Erp	Confederation of Netherlands Industry and Employers (VNO-NCW) and Royal Association MKB-Nederland, Secretary education	November 28 2011
Mark Frederiks	Accreditation Organisation of the Netherlands and Flanders (NVAO), Coordinator international policy	November 22 2011

Clemens Spoorenberg	NIBE-SVV/EBTN, President EBTN/Deputy-director NIBE-SVV	November 30 2011
Ria van 't Klooster	Dutch Council for Training and Education (NRTO), Director	December 21 2011
Janneke Voltman	COLO (since 1 January 2012: Samenwerking Beroepsonderwijs Bedrijfsleven (SBB)	November 28 2011
UK (Scotland)		
Aileen Ponton	SCQF Partnership, Chief Executive	November 17 2011
Jack Matthews	Improve Ltd, Chief Executive Officer	November 10 2011
Garry Cameron	Next Practice, Scotland's Colleges, Stirling, Manager	November 14 2011
George Brown	Scottish Qualifications Authority, Head of Accreditation	November 17 2011
Kirsty Conlon	Universities Scotland, Manager/Policy Adviser (Learning & Teaching)	November 17 2011
Austria		
Eduard Staudecker	Austrian Federal Ministry for Education, Arts and Culture, Strategy Development (VET)	December 2 2011
Elisabeth Frank	Federal Ministry of Science and Research Directorate General I (Universities, Universities of Applied Sciences)	December 5 2011 (input by mail)
Elisabeth Westphal	Universities Austria, policy Advisor for the Bologna Process, Higher Education in Europe and Teaching	November 23 2011
Thomas Mayr	Institute for Research on Qualifications and Training of the Austrian Economy (IBW), Director	November 22 2011
Bernard Horak	Chamber of Labour Vienna (Arbeiterkammer Wien), Coordinator of EU-Topics in Education and Training	November 29 2011
Poland		
Agnieszka Chłoń-Domińczak	Educational Research Institute / NCP, Project Leader	November 30 2011
Hanna Reczulska	Ministry of Science and Higher Education/ ENIC-NARIC Poland	November 21 2011
Tomasz Saryusz-Wolski	Technical University of Lodz, Head of the International Faculty of Engineering	November 24 2011
Sweden		
Rita Bergenhill	Swedish Public Employment Service | Division of Employment Development, handling officer	November 22 2011
Anders Färdeman, Christina Pontis	Swedish National Agency for Education (Skolverket), Director of Education	November 28 2011
Anders Johansson	the Swedish Teachers' Union (Lärarförbundet), Senior Officer	November 29 2011
Janerik Lundquist	Linköping University, International	November 28 2011

	Coordinator	
Stefan Skimutis	Swedish National Agency for Higher Vocational Education , International Coordinator	November 14 2011
Rita Bergenhill	Public Employment Service	November 22 2011
Germany		
Georg Hanf	Federal Institute of Vocational Education and Training (BIBB), Head of Unit 'Internationalising German VET/Monitoring VET Systems'	November 22 2011
Susanne Mueller	Confederation of German Employers' Associations (BDA: Bundesvereinigung der Deutschen Arbeitgeberverbände), Adviser	November 17 2011
Hermann Nehls	Confederation of German Trade Unions (DGB: Deutsche Gewerkschaftsbund), Head of Unit	November 28 2011
Christian Tauch	German Rectors' Conference (Hochschulrektorenkonferenz (HRK), Head of department "Education"	November 29 2011
Italy		
Diana Macrì	Institute for the development of vocational training of trainers (ISFOL), Researcher in the field of Education and training	November 24 2011
Francesco Mauro	Universita' degli Studi Guglielmo Marconi, Rome, Professor	November 29 2011
Luca Lantero	NARIC Italia – CIMEA, Director	December 2 2011

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