



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES  
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE  
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES  
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

## **UEAPME Position on the Commission's consultation 'Towards a European Qualifications Framework for Lifelong learning'**

### **Introduction:**

The European Commission launched its public consultation on its proposal for a European Qualifications Framework (EQF) during the summer 2005. The main aim of the EQF is to enhance transparency, supporting mutual trust and to enable the transfer and recognition of the qualifications of individual citizens. The EQF is supposed to be a meta framework structured into 8 levels, based on learning outcomes, which are described by level descriptors. The EQF should be supported by various tools, including ECVET, EUROPASS and PLOTEUS, amongst others. This initiative is voluntary and does not entail any legal obligations for the member states.

### **1. General comments on the aims and objectives of the EQF**

UEAPME, the European organisation representing crafts, small and medium enterprises, welcomes the initiative and principle for such a European Qualifications Framework. The EQF should help to enhance mobility, transparency and mutual trust, which are crucial in order to reach the Lisbon goals.

Moreover, UEAPME strongly supports the voluntary basis for using such a tool. Against this background, and in order to ensure the future success of the EQF, national education and training authorities will need in depth guidance and comprehensive explanations about the new approach.

Finally, for a wider use of EQF and in order to make it relevant for companies and individuals, great efforts are required to make it more simple and accessible in relation to the descriptors and the architecture.

Concerning the main principle of EQF, UEAPME particularly supports the innovative approach of the initiative, which strongly puts the emphasis on learning outcomes, irrespective of the learning pathways (ie formal, informal and non-formal). Learning outcomes should focus on their "usefulness" for employment and employability. The EQF should be closely linked to the labour market. We consider this profound change in the approach as essential for a better valorisation of competences and key components of labour market needs. This move forward is fully in line with the necessity for the implementation of a real lifelong learning policy. In addition, it fully meets the objectives defined in the Maastricht communiqué namely:

- To improve the image and attractiveness of the vocational route for employers and individuals, in order to increase participation in VET.
- linking VET with the labour market requirements of the knowledge economy for a highly skilled workforce,
- identification and validation of non-formal and informal learning.

This new approach, focussing on competences and no more only on academic titles, should also strongly contribute to reach the parity of esteem and links between VET and general education, in particular with higher education.

Furthermore, UEAPME agrees that a meta-framework, which has mainly a translation function, is the right approach for relating national qualifications and national qualification frameworks, where they exist, better with each other. However, the decision if, when and how, to develop a National Qualifications Framework (NQF), has to be left to the national level. If a NQF is established, the cultural specificities have to be taken into account when relating it to the EQF.

## **2. Comments on the content of the EQF**

UEAPME's main concern is the juxtaposition of two different tables within the EQF proposal, which are based on contrasting concepts, table one called "The eight levels of the EQF defined by learning outcomes" and table two called "Supporting information about levels in the EQF". These two tables are mixing up two different logics: the one focusing on learning outcomes (table 1) and the other based on very formal education systems (table 2). UEAPME strongly calls for a complete deletion of table two. This would avoid any risk of falling back into the trap of the old and well-established habit of focusing on learning inputs and jeopardising the present efforts made for developing a new approach based strictly on learning outcomes.

We therefore suggest that the Commission develops a practical tool with some concrete examples mainly dedicated to the national qualification authorities which better explains the logic of learning outcomes.

## **3. Further Specific remarks on the technical elements of the EQF**

### **a. Levels**

The Commission proposal of eight levels is broad enough to picture learning progression and building up competence when moving from one level to another. However, UEAPME underlines the fact that the eight levels strictly based on learning outcomes and encompassing all types of learning outcomes, do not necessarily reflect the work place reality of many professions.

In order to have a better integration of higher education and VET and learning outcomes, a revision of levels content could help avoiding that the highest levels refer back to the academic system, since the current highest levels (levels 6, 7 and 8) seem to be taken to a too great extent from the Bologna process. Furthermore, the highest level is already achieved with a PHD – so there is no room for further progression through work experience and lifelong learning.

For UEAPME the highest level, whatever the number is, should correspond to the level of excellence in any given profession, be it baker or engineer, without any reference to learning duration or type of learning. Even if their education and training pathways are different in terms of content and duration, it should be possible for both to attain the upper level with the relevant education and training and work experience.

In order to be fully consistent with the learning outcomes approach, the logic should be based on professions and work organisation and not on the results of academic input orientated system.

Moreover, the eight levels should provide further flexibility, so that, it should be possible for the same person to have some competences, skills and knowledge from different levels, (for example some knowledge from level 3 and competences from level 4).

### **b. Level descriptors**

The concepts of knowledge, skills and competences are closely interlinked and seem difficult to be divided into three different concepts. Nevertheless, UEAPME can understand the necessity to have an artificial separation of the descriptors in table 1 for analytical reasons and in order to have clarity for national bodies. However, for UEAPME, and in order to be more relevant for companies and the labour market needs, an additional short summary and description of competences (not more than 2-3 lines for each level) that describes what a person at these levels typically can do, would be preferable.

Furthermore, UEAPME considers that the Commission should partly re-evaluate the language and content used for the level descriptors. In order to reach the objectives of the EQF, the descriptors should better reflect the reality of working life and workplaces, which is currently not the case. The formulation of descriptors should use a more neutral terminology like the one used for the knowledge descriptor in level 7 “create a researched-based diagnosis to problems by integrating knowledge from new or inter-disciplinary fields etc...”

It refers once again too much to academic practices and not enough to the world of work. Therefore, competences based on professional and vocational learning outcomes should be integrated on all levels.

### **c. Relation between EQF and NQF and SQF**

Ideally, the NQF should be flexible enough to be linked to SQF if the sectors wish so, while the EQF should be flexible enough to be able to be linked to any kind of qualification framework, be it national and/or sectoral. A significant problem is that the EQF is looking at learning outcomes (output orientated: what somebody can do) while many national qualification systems and/or NQFs are based on learning expectations (input oriented: what somebody should know). Therefore, we call upon the Member States to adapt their national qualification systems to learning outcomes, and when designing a NQF to take learning outcomes as the point of departure. Furthermore, we consider that a SQF should primarily be integrated into a National Qualifications Framework in order to ensure more consistency in each country.

#### **d. EQF relation to ECVET**

European Craft and SME employers recognise the important relationship between EQF and ECVET, both being based on learning outcomes. With the long-term aim of the equivalence between VET and general education, we support the merging of the ECVET and the ECTS, which both should be related to the EQF and based on learning outcomes.

#### **e. Quality assurance**

UEAPME supports the ongoing European quality assurance approach (i.e. CQAF), which includes peer learning activities and exchange of experiences. The assessment of learning outcomes is an important part of the quality assurance process and we believe that a common approach can help enhancing the transparency of the national systems and national qualification bodies in order to develop mutual trust.

### **Conclusions:**

UEAPME supports the principle of an EQF, based on learning outcomes. However efforts are still required to improve the level descriptors to capture all kind of learning and to better reflect the reality of working life.

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