



Summary

of responses received to the Commission's consultation on the EQF during the 2nd half of 2005

This paper summarising the responses to the EQF consultation process is based on

- a preliminary report prepared for the Commission by the *Pôle Universitaire Européen de Lorraine* (1) and
- an analysis by Cedefop (2).

The Commission consulted the 32 countries participating in the work programme Education & Training 2010, the European social partner organisations (employers and trade unions), European associations and NGOs in the area of education and training, European industry sector associations and DG Education and Culture committees and networks (e.g. Euroguidance, NARIC). The additional 13 countries which take part in the Bologna process were also informed.

The Commission has received approx. 120 responses from 31 European countries (the responses are accessible on the following website: http://europa.eu.int/comm/education/policies/educ/eqf/resultsconsult_en.html). The largest group of responses comes from national and regional authorities (35% of responses), followed by education associations and NGOs (23%), the sectors (14%) and the social partners (8% from employers, 4% from the trades unions).

It should be noted that responses in most cases build on extensive national and Europe-wide consultation processes. The number of stakeholders actually involved in the consultation process is therefore significantly higher than the approx. 120 listed above.

AREAS OF BROAD CONSENSUS

In general, the EQF is seen as a constructive initiative which should contribute significantly to the transparency, transfer and recognition of qualifications within the European labour market. The EQF is also seen as an initiative which should stimulate national and sectoral reform processes. The replies to the consultation show broad

1 An extract of Pôle Universitaire's preliminary report is attached as an annex.

2 The analysis of Cedefop is also reflected in the conference workshop issues papers (1-5).

agreement on the following issues:

- the EQF is necessary and broadly relevant;
- its implementation and use should be voluntary;
- the EQF should remain a common reference or meta-framework, acting as a translation device at the European level;
- the EQF must be based on learning outcomes;
- the proposed 8-level structure is broadly acceptable;
- the EQF must be underpinned by Quality Assurance principles;
- an operational EQF will require substantial commitment by stakeholders at the national level and, in the large majority of countries, could result in the development of overarching National Qualifications Frameworks.

This feedback may be seen as offering a strong mandate for the further development and implementation of the EQF.

THE NEED FOR CLARIFICATION, SIMPLIFICATION AND FURTHER DEVELOPMENT

The broad support to the EQF outlined above has been made conditional on further development and refinement. Many respondents find the proposal complex and abstract and point to the need for clarification, simplification and testing.

Clarification

There is considerable concern as to the clarity of concepts underlying the EQF proposal. This applies in particular to the definitions of concepts like qualification, competence and sector. Many of the respondents underline that conceptual agreement is a prerequisite for practical co-operation. The definitions of (national and meta) qualifications frameworks seem to have been accepted and contributed to the clarity of the responses.

Simplification and focus on key objectives and functions

Many of the responses express concern that the proposal is too complex and that it tries to embrace too many objectives and functions at the same time. A stronger focus on the crucial translation function is seen by many as a condition for success.

Testing

The emphasis on simplification was in many cases accompanied by a request for a pilot phase and testing (e.g. Slovakia, Germany, Luxembourg, Finland, UNICE, etc.). This reflects the common view that the EQF requires long-term development allowing for improvements based on practical experiences.

KEY AREAS FOR FURTHER DEVELOPMENT

In addition to the general need for clarification, simplification and testing, responses focus on certain key-issues:

- descriptors,
- the link to the higher education framework and the Bologna process
- national qualifications systems and their link to the EQF
- the role of sectors

Descriptors

27% of respondents agree that the proposed descriptors capture the complexity of lifelong learning, while 44% agree to some extent and 5.5% disagree with this proposition. This indicates that the descriptors have to be revised and refined.

Criticism is, in particular, directed towards the third category of descriptors, ‘wider professional and personal competences’. While admitting that this category covers many important learning outcomes, many respondents find the proposal to be overly complex (4 sub-categories) and difficult to apply in practise (how to measure personal competences?). This could increase the difficulty of aligning national qualifications to the EQF and reduce the relevance of the EQF as a tool for practical cooperation.

Other respondents (e.g. the Paris Chamber of Commerce and Industry) believe the Commission’s approach is too hierarchical and linear, artificially placing a person at the same level across the knowledge, skills and competences descriptors, when the reality might be that he or she appears at a different level for each of these three. Some stakeholders point to what they perceived to be omissions or imbalances, e.g. not enough emphasis on non-formal learning or professional competences.

Particular attention has been given to the descriptors under levels 6 to 8. Some find them too much oriented towards academic at the expense of vocational qualifications (Austria, Malta). Others are of the opinion that levels 6-8 should be the exclusive responsibility of higher education and the Bologna process.

The EQF’s relationship with the Bologna process

Respondents called for more clarity in the EQF’s relationship with the Bologna Process (i.e. the development of the European Area of Higher Education). Some stakeholders were concerned that the EQF might run in parallel or be incompatible with the Bologna Process or even supplant it. Universities in particular expressed this concern as did a number of countries including the Netherlands, Ireland, Denmark and Croatia. Others emphasise, however, that high level qualifications should be promoted in all fields of education and training - vocational as well as general. For this purpose levels 6-8 should be relevant to qualifications also outside the academic field

National Qualifications systems

Certain countries have indicated that they do not intend to establish a national qualifications framework and this is not a prerequisite for linking up to the EQF. However, the large majority of countries intend that a national qualification framework will eventually be their main ‘relational entity’ to a future EQF. By this is meant that the process of placing or aligning a particular qualification to the EQF would be carried out through their National Qualifications Framework, whether existing or still to be developed. While differing in emphasis and detail, the consultation responses tend to agree that the following minimum requirements have to be met when setting up an NQF:

- It must be based on learning outcomes.
- It will require a ‘self-certification’ process supporting consistency and mutual trust.
- It will require the inclusion and acceptance of all national stakeholders, not only in education and training but also involving the labour market.
- It will require integrated systems for the validation of non-formal and informal learning.
- It will require robust, transparent and trustworthy quality assurance mechanisms.

Sectors

There is a wide-spread concern by countries that the development and promotion of international sectoral “qualifications” could reduce transparency, threaten quality and undermine mutual trust towards publicly recognised qualifications which are the responsibility of national education and training authorities.

The opposite position is represented by a number of sectoral organisations and associations arguing that the rapid changes in markets and in technology require European or international qualifications.

Other issues

In addition to the above issues, which were highlighted in most responses, the following issues attracted less attention:

- 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.
- Credit transfer and recognition: the majority of those who replied believe that a credit system was necessary for an operational EQF.
- Europass: most respondents who answered this question believe that the EQF should be linked to Europass, with ministries and regional authorities responding most favourably to this idea.

**Extract from the preliminary report
“Expert assistance to the Commission’s consultation on the European
Qualifications Framework”**

Pôle Universitaire Européen de Lorraine, Nancy

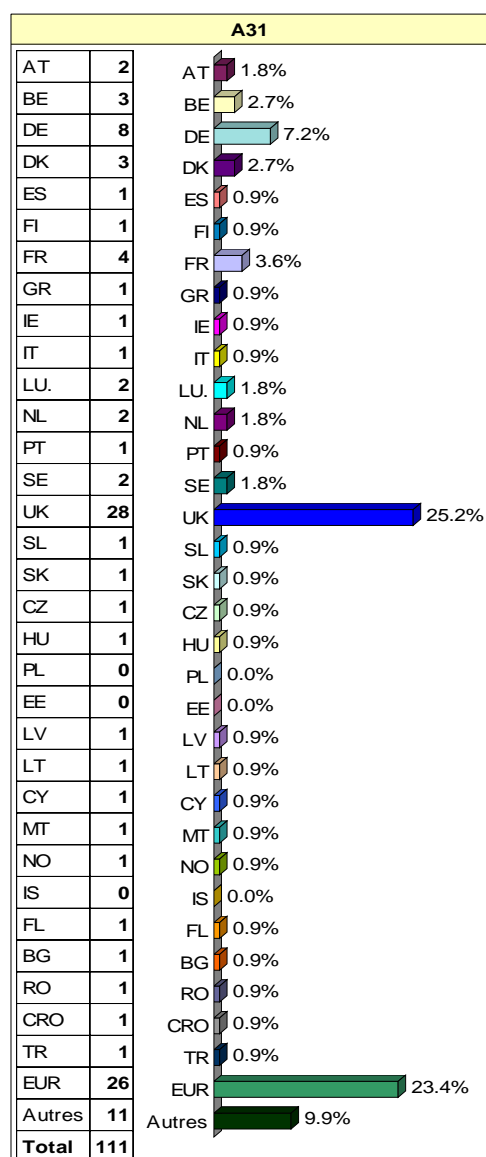
Preamble – general remarks

In this section, some references are made regarding the respondents. These references are mentioned in (), where the respondent is mentioned with its specific id. A specific annex presents the list of respondents with their respective id. When a country is mentioned in the reference, it means that it is an institutional answer.

Analysis of answers received

The following tables present the distribution of respondents by country and by type of respondent.

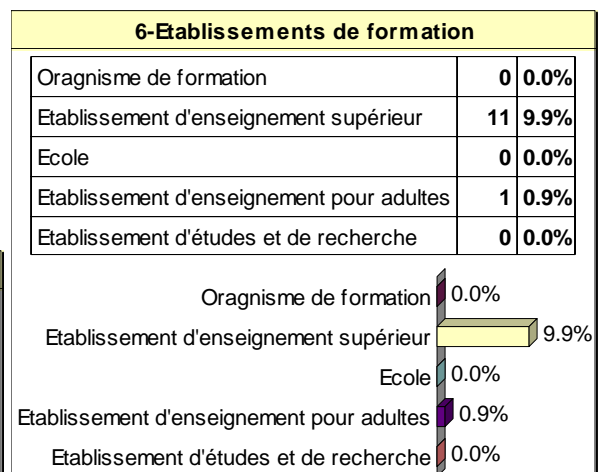
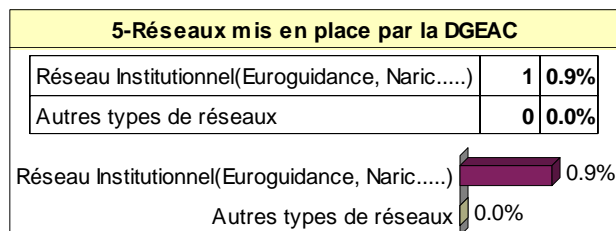
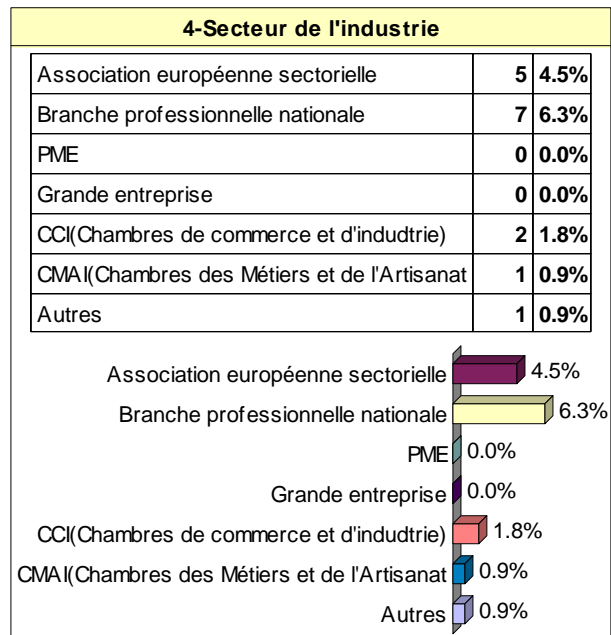
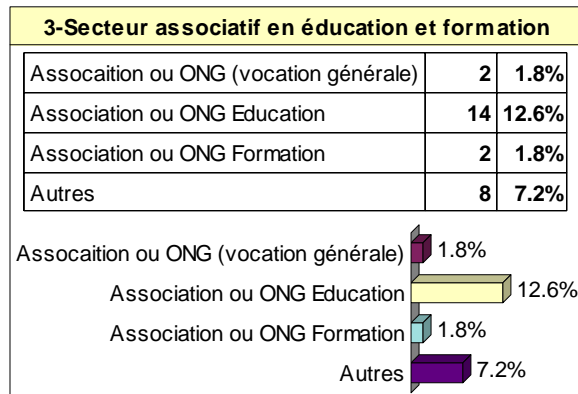
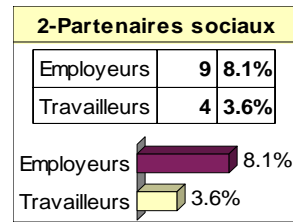
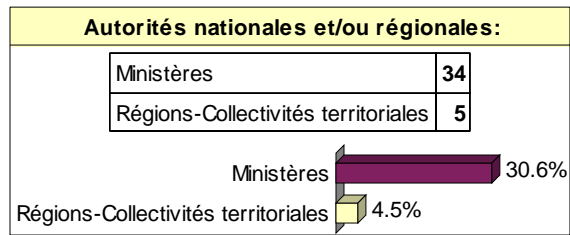
Table 1 A Distribution of respondents by country (T1A)

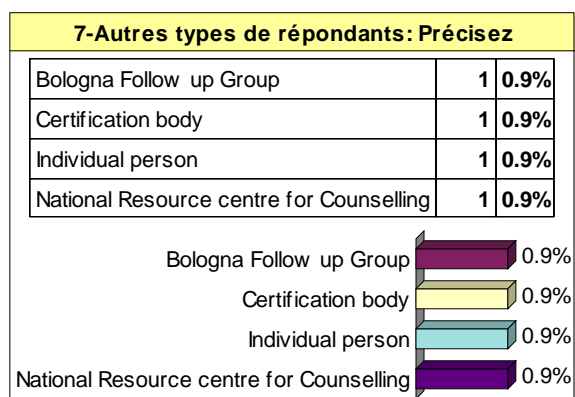


Comments on Table 1A

There is an overrepresentation of some countries (UK - 25%, EUR - 23%) with regard to the other countries. Then comes Germany (7%), Switzerland (7%) and France (3,6%). Such an analysis has to be interpreted carefully, because, in some countries there has been a vast consultation process organised by the Member State where quite a lot of stakeholders of this country have participated (see specific remark below).

Table 2A : Distribution of respondents by type of respondent





Comments on Table 2A

The distribution of respondents by type of respondents reveals the following situation:

- There is an important number answers made by national and regional authorities (35%).
- The participation of social partners scores around 12% (8% for the employers side and 4% for the workers side).
- The entire associative sector is well represented (23%) with significant number of answers from association/NGO in the education sector (12,6% of the total number of answers).
- The sector of industry represents 14% of the total number of respondents. To be also mentioned that the great majority of respondents are coming from either European sectoral association or national professional branches.
- The networks established by DGEAC have not been so active but generally they have indirectly contributed to this consultation process via the national organisation put in place in quite a lot of countries.
- Individual education and training institutions also responded (11%); the great majority of answers are from the higher education sector.
- A small number of "others" should be mentioned.

More generally, the institutional sector, the associative sector in education and training and the education and training institutions represent around 70% of the answers received where as the industrial sector (including the social partners) represent only 26% of the answers.

General qualitative comments

Around 110 answers have been received by the end of January 2006. To a certain extent, this result is satisfactory although there are great disparities: Whereas some answers are very comprehensive and detailed - for example:

Germany (3), Austria (84), Denmark (87), Norway (81), etc. – some other are quite short and mainly limited to one specific aspect of the Commission's proposal (for example: a UK University, in relation to the Bologna process),

- It is quite significant to note that Member States' responses (in all cases, under the responsibility of the Ministry of Education) have been prepared following an intense period of consultation with all the actors concerned – in particular, other Ministries involved in education and training activities/programmes, social partners, Chambers of Commerce and Industry, NGOs, etc. This is the case, for example, for The Netherlands (43), France (58), and Finland (77).
- Nearly all the new Member States have answered very fully the questions raised by the Commission in its EFQ proposal: Slovakia (90), Hungary (69), Slovenia (98), Cyprus (97), Latvia (48), Lithuania (94), Malta (95), Czech Republic (88) – with only Poland and Estonia missing (even if some answers are still pending). Furthermore, countries such as Romania (72), Bulgaria (49) and even Croatia (101) have actively participated to this consultations, as Norway (81) and a relatively significant number of interested stakeholders from Switzerland (such as the National Employers' Center/60 or the Swiss Further education Association/44).
- Social partners at Community level have reacted to the proposal – UNICE (1), ETUC (24), UEAPME (9), CEEP (85) and CESI (41) –, as some specific European sectoral organizations such as, on the employers' side CEEMET (51) in the area of construction or UEAPME/Construction forum (15), as well as, on employees' side, the ETUC-affiliated Teachers' Trade-Union (103). At national level, bodies such as Chambers of Commerce and Industry or "Chambre des Métiers" in France have also reacted in a very detailed way (CCIP/75, APCM/55).
- A number of European-wide organizations with an education and/or training function have also answered the Commission's consultation: this has been the case, for example, for EUA (22), EURASHE (50), for EUROGUIDANCE (11), EFVET (47), EAEA (86) and for FEANI (36) or EARLL (111). It has also attracted the interest of structures set up following the Bologna process, such as BFUG (83).
- Finally, it is worth noticing the array of answers that have been sent from the UK, starting with various administrative and official entities of the different part of the United Kingdom (DES/80, Welsh Assembly/30,

Scottish Executive//6, UKHE/7, etc.), then various Governmental Agencies such as QAA/34) - to which one should add a number of UK Universities.

- The diversity of comments and suggestions offered by the reacting Institutions offer already some ground for further reflection.

Two major findings

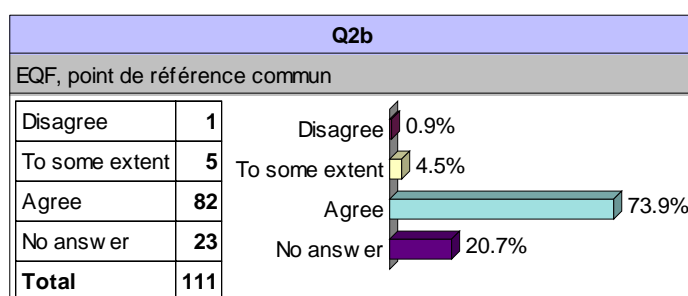
There are at least two general issues on which all the respondents have agreed (in the direction proposed by the Commission), while even going further in that direction:

EQF as a "Meta-framework".

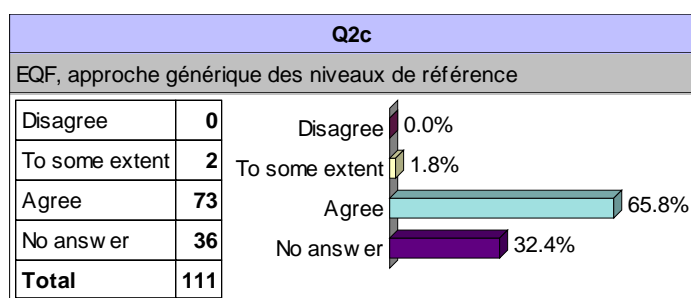
This point has been made very strongly by a number of respondents: EQF is and should remain a "translation device", nothing more, but nothing less. This has been the position taken for instance by the Department of Education and Science in Ireland (87). In this direction it has been underlined that, as a "Meta framework", it should avoid any new requirements on users and promoters (Welsh Assembly/30, DES-UK/80). In this sense, as such, EQF, for the majority of the respondents, can't be a tool for the recognition of qualifications and, obviously can't replace existing systems and provisions set up in the Member States to that effect.

The following tables confirm the vast majority of answers given by the respondents on this issue.

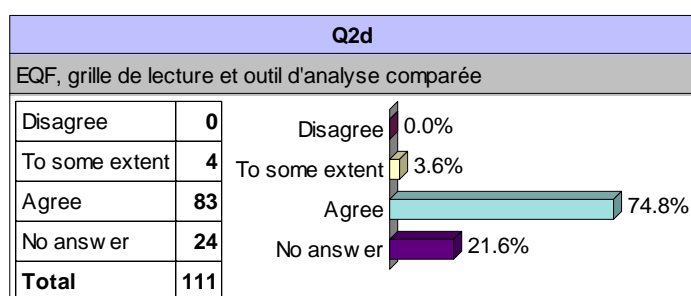
T3A/Q2b : EQF - shared reference point



T4A/Q2c : EQF Generic approach for the levels of reference



T5A/Q2d : EQF - translation device

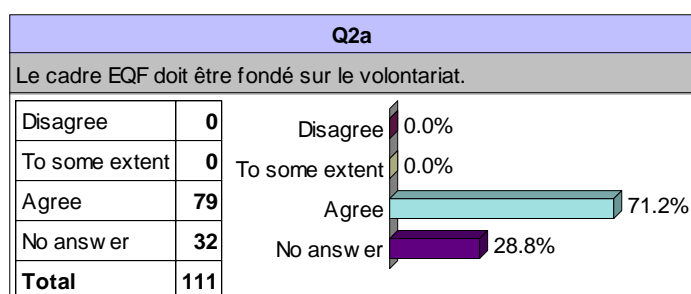


EQF as a voluntary scheme

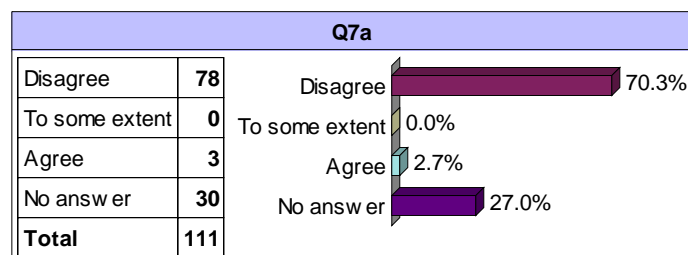
None of the responded has advocated something else than a "voluntary" scheme, to be implemented if and only if the relevant Member States or, say, European employers' sectoral organisations do find it relevant for their purposes. In fact, quite a number of respondents have insisted on the need to have first in their own country a National Qualification System (NQF) - as a kind of prerequisite for EQF: this has been, for example the position of the French-Speaking part of Belgium (96), of Czech Republic (88) and even of the Swiss Association of professional engineers (46).

The following tables confirm that situation regarding the voluntary character of the EQF.

T6A/Q2a : EQF should be voluntary based



T7A/Q7a : EQF must be obligatory



In fact, this position was to be expected. On the one hand, it was more or less the message given in the Commission's proposal; on the other hand there are Member States where a fully-fledged NQF system does already exist with the relevant authorities not interested in seeing it transformed through the establishment of the EQF (essentially in the UK). Further, there are a number of Member states which are in the process of establishing their own NQF and who considers EQF as some kind of a backbone but with the priority to be given to the establishment of their own NQF (for example: Lithuania/94).

The EQF and other EU initiatives

Many respondents questioned the link and/or the relationship between the proposed EQF and existing provisions and initiatives taken by or at the EU level. The key word here is consistency (and economy of scale).

Four specific groups of concern can be identified:

- [the relationship with the Bologna process](#), i.e. with what has been and is being undertaken so far regarding the building up of a "European Area for Higher Education".

Several respondents have expressed the fear that EQF could replace (Scottish executive/6) or supplant the Bologna process. One respondent has even stated that there is an incompatibility between EAHE and EQF (UK Higher education/7), while some other have expressed the fear that implementation of EQF will lead to the emergence of two parallel systems (Eurashe/50).

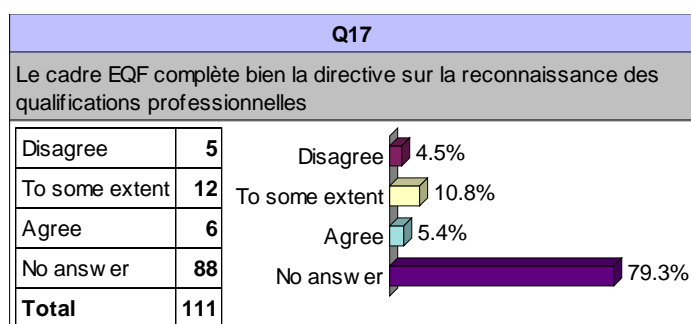
While nearly all the universities that have answered the consultation are naturally concerned about this possible duplication (for example: Leeds University/109, Universities Scotland/105), it is important to notice that it is also a matter of preoccupation for several Member states or countries

(for example: the Netherlands/43, Ireland/93, Denmark/87, Croatia/101). The Bologna Follow-Up Group (83) insists on the need for clear consistency between EAHE and EQF, while the Higher Education section of the DES (7) wonders about the 20 countries which are involved in the Bologna process and are out of the EQF sphere of application.

■ [the relationship with the existing EU Directive on the Recognition of Professional Qualifications.](#)

The following table presents the position of the respondents vis a vis the linkage of the EQF with the EU Directive on the recognition of professional qualifications.

T8A/Q17 : EQF complements the EU directive



Comments :

Very few respondents answered clearly to that question (around 80% did not answer). If one takes only the respondents which have answered that question, the situation is far from being so clear: 5 respondents completely disagree, 12 consider that EQF complements the directive up to a certain extent and 6 agree that there is a genuine complementarity.

A last point concerns the provenance of the respondents: out of the 23 respondents who answered that question in one way or another in their contribution, 9 are from Ministries or Regional authorities (40%).

While EQF is certainly not a tool for direct recognition of qualifications, its functions, by delineating levels and their content can't escape the issue of its coherency with the said EU Directive! Several respondents have wondered how EQF and this Directive will relate in practice (for example Finland/77) and/or have asked very strongly that this issue is clarified (for example,

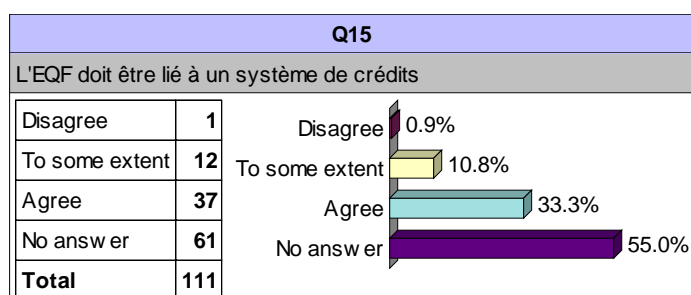
University of Ulster/78). Over and beyond a similar concern expressed by several countries in their "national response" (for example, Bulgaria/49, Latvia/48), social partners such as UEAPME-Building (15) or RICS (40) have wondered equally about it. There has been even a respondent (RICS/40) to suggest that EQF could close the gap between the said Directive and the forthcoming EU Directive on Services that is being examined by the Parliament and the Council.

- **EQF and Credit /transfer and recognition**

This was one of the key questions contained in the grid of analysis. In fact, few respondents have given a specific answer (taking into account the fact that, to a certain extent, this issue is indirectly covered by the one before). However, some respondents have expressed the fear that an EQF without any linkage to credit transfer and recognition may lose quite a lot of its interest (CEEP/85, Hungary/69, EARLL/111).

The following table presents the position of the respondents vis a vis the linkage of the EQF with credit transfer system.

T9A/Q15 : EQF has to be linked to a credit system



Even if more than half of the respondents have not answered directly to that question, a vast majority of them which have answered consider quite indispensable to link EQF with the development of credit system (74% of the respondents which have answered that question). If one takes the overall figures, around 44% of the respondents consider as a matter of importance to consider the articulation of a credit system with the EQF.

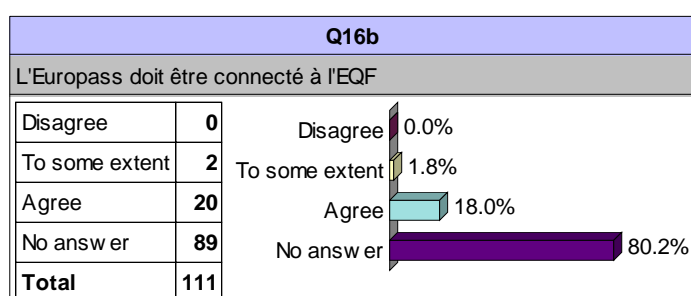
- **EQF, EUROPASS and PLOTEUS**

This issue was raised at the end of the grid of analysis. It is interesting to note that a significant number of respondents underline the need to link, one way another, EQF with these two EU instruments - with in fact one

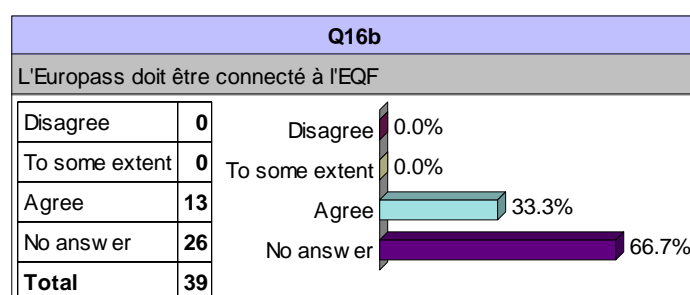
respondent (CEEMET/51 - the EU metalworking employers' Federation) considering that, in fact, EUROPASS was closer to the needs of the employers. For all the others (for example: Luxembourg/89, Hungary/69, APCM/55, UEAPME/9, Latvia/48, Bulgaria/59, France/58, the Netherlands/43, etc.) a stronger link between EQF and EUROPASS/PLOTEUS was considered as essential. Malta (95), for its part, considered that EQF should also be linked with other existing networks, such as NARIC.

The following tables present the position of the respondents vis a vis the linkage of the EQF with EUROPASS.

T10A/Q16b : Europass has to be linked to EQF (overall answers)



T10B/Q16b : Europass has to be linked to EQF (Ministries and regional authorities)



First of all, the percentage of non respondents to this question is quite high (80%). Out of the ones which have answered there is an important majority in favour of connecting Europass to the EQF (91% of the one which have answered).

It is important to notice that out of the one which have answered (22 answers), 13 of them are coming from Ministries and regional authorities and all agree to have a connection between both tools.

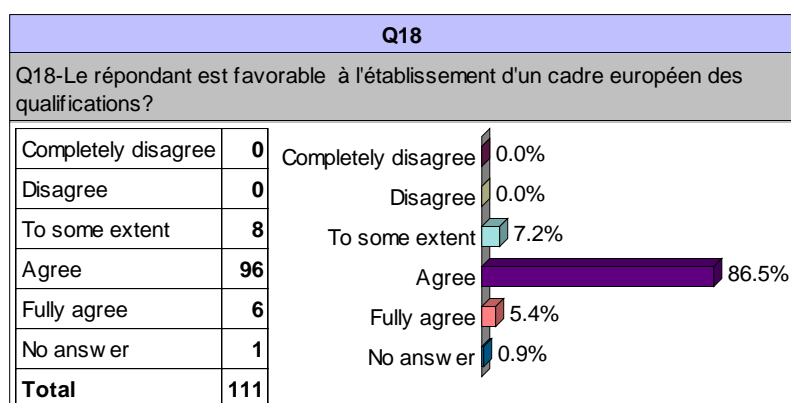
To sum up this section of this report, many respondents (especially the Member States and countries), while welcoming EQF as a voluntary Meta framework, not endangering their own national provisions for assessing and awarding qualifications, expressed the need to see this "translation" device more closely related to existing EU relevant instruments.

The EQF: its usefulness, practicability and implementation

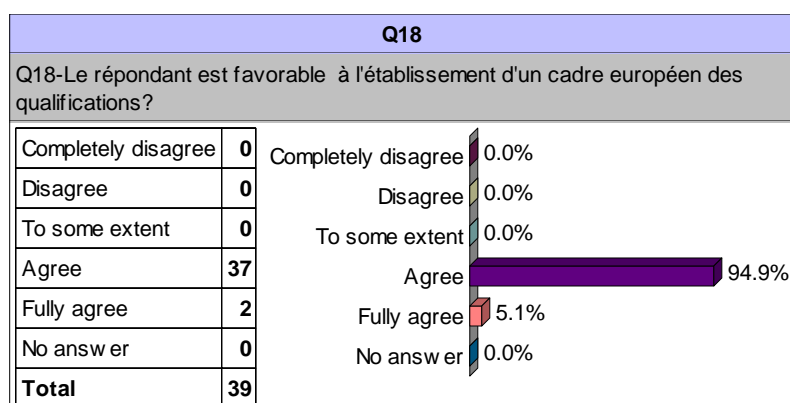
Is EQF useful, and useful enough for justifying the efforts to be done in developing and implementing this approach. On the whole, the answer is definitely "YES" - although there have been some dissenting voices.

The following tables present the position of the respondents whether they are favourable to the development of an EQF.

T11A/Q18 : The respondent is favourable to the development of an EQF (overall answers)



T11B/Q18: The respondent is favourable to the development of an EQF (Ministries and regional authorities)

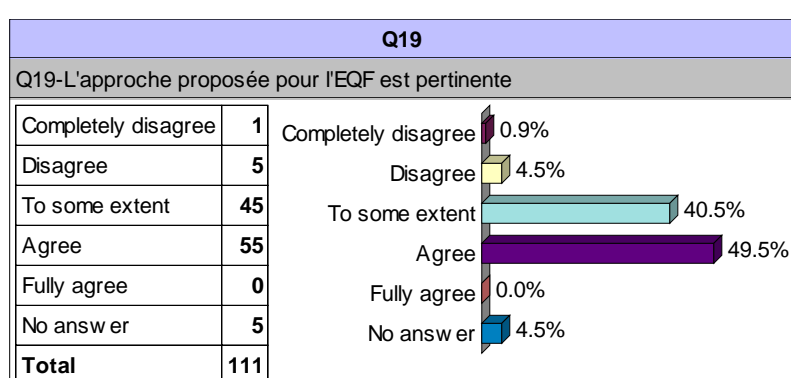


It is important to notice that no respondent disagree with the development of an EQF. A vast majority of them agree (87%), the other agree to some extent (7%) and the other fully agree (6%).

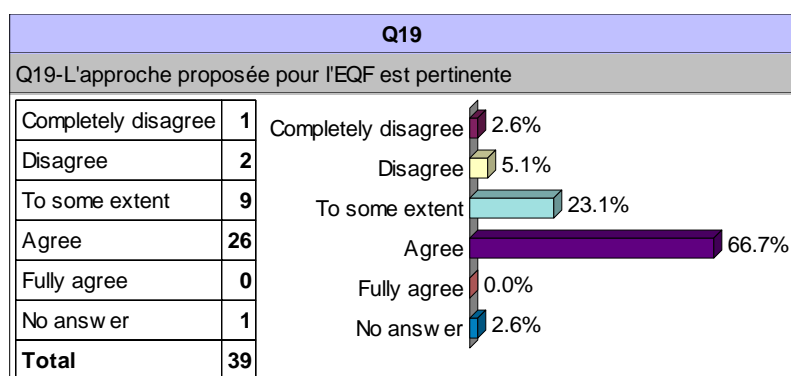
More importantly, the respondents from Ministries and Regional authorities do all agree (95%) or fully agree (5%).

However there are more various positions on the approach proposed and its potential complexity. The following tables present the answers on these issues:

T12A/Q19 : The proposed approach for EQF is relevant (overall answers)



T12B/Q19 : The proposed approach for EQF is relevant (Ministries and regional authorities)



Regarding the overall situation, 50% of the respondents consider the proposed approach for EQF relevant and 40 % of them consider it but up to some extent. This situation is more positive when one looks the figure from Ministries and regional authorities (67% consider the approach relevant and only 23% consider the approach relevant up to a certain extent).

General qualitative comments

A number of respondents (employers organizations mainly) have considered the proposal too complex to help them, wondering even if the proposed approach reflect the reality of work (CPE/60, APCM/55, CEEMET/5, SWISSMEN/31, etc.).

One of the reasons why those hesitations have been expressed is, according to the respondents concerned, the insufficient relationship with the Labour market, more generally with the concern of the business and industry community.

Member states and countries such as France (58), Greece (100), Norway (81), Ireland (93) or Croatia (101) felt that EQF should be brought closer to the interest of employers, i.e. of those who may hire people from another country and want to know what are really his/her qualification in relation to a common approach. This is also the position EU employers' organizations such as UNICE (1).

If one of the key issues, as expressed by the Netherlands (43), is that of demonstrating the usefulness, i.e. the added value of EQF to its concerned stakeholders, then, over and beyond the issue of a closer link to the labour market, 3 main concerns have been expressed and are worth being noticed for further work:

Simplification and transparency

A large number of respondents has asked for simplification (for example: Sweden/104, UNICE/1 - but also Norway/81 or Austria/84, which considers the present text to be too abstract and complex. The same can be said for E-Skills/92 (which advocates a realistic approach) or Czech Republic /88, which, like many others insists on the need to have an EQF that is understandable and comprehensible by and for all the stakeholders concerned.

Such a needed simplification should undoubtedly increase the level of transparency of EQF - an issue which has been stressed by several respondents, such as UAPME-Building/15, the Welsh Assembly/30 or SSMA/5.

Testing and Experimenting

Many respondents have underlined the necessity to move ahead gradually, starting with some testing or/and a Pilot phase. Countries such as Finland (77) - which notes that the Commission's proposal contains no indication regarding timing and implementation-, Norway (81), Slovakia (90), Luxembourg (89), Sweden (104) - but also UNICE (1), UCET (8) or the London Metropolitan University (14) consider it essential that such an experiment be conducted, covering several countries and several sectors, and involving all the stakeholders concerned. In fact, it goes even further since some respondents are evoking the need for an "Action Plan" (CEEP/85, AHEA/86).

Communication, Dissemination and Evaluation

As simplified and closer to the needs EQF may evolve, it should remain the matter for a closed circle of specialists and experts! It is essential that a well-structured communication and dissemination strategy is developed, with all the help needed for guiding the interested parties in using EQF fully and properly. This concern has been expressed by many respondents from different quarters such as Euroguidance (11), the Welsh Assembly (30) or UEAPME (9).

However, linked with the testing/pilot phase and accompanying the communication/dissemination process, there is also the need not only to monitor EQF developments but also to evaluate its appropriateness and its effects - if any (EfVET/47). This point was stressed in the Commission's communication indeed - but as EfVET is asking: what kind of international experts?

In relation to all this, one should also note the point made by Hungary (69) that EQF may be unsuccessful if not enough resources are allocated to its development and implementation - with even one respondent (Slovakia 90) suggesting that financial incentives be allocated to employers for using EQF when considering hiring foreign staff.

EQF: structure and content

This issue, obviously, is the key one:

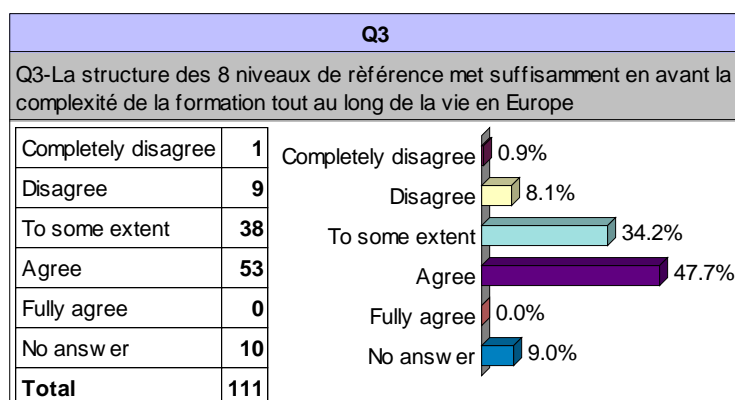
- Does the structure of EQF, i.e. its content and set of definitions, corresponds to what is needed, or at least expected from a "Meta framework", the purpose of which is, according to the great majority of respondents, to increase transparency and mobility across the EU ?
- Has the Commission in its proposal, i.e. in the number and nature of qualification levels, captured enough of the complexity of the "real world"?
- Can one really delineate specific areas for knowledge, skills and competences throughout the different (and successive levels?

The answer to these questions and many others that could be derived from is essential and may offer some guidance for further work in this area.

If, on the whole, the great majority of the respondents are satisfied with the 8-level structure proposed by the Commission, or, at least, do not have major problem with it, there are however a number of criticisms - with a large majority of respondents asking for both the levels and descriptors to be clarified and revised (FEANI/86, Manchester University/39, QAA/34, etc.). Some respondents considered the Commission's approach as "biased" (i.e. it is not enough balanced and gives too much importance to academic qualifications as if levels 6 to 8 wouldn't be attainable for those following a vocational training pathway (Austria/84, Malta/95, etc.).

The following tables present the position of the respondents regarding 8 levels structure proposed within the EQF:

T13A/Q3: The 8 levels reference structure sufficiently captures the complexity of lifelong learning in Europe EQF (overall answers)



47% of respondents do agree that such a structure captures the complexity of lifelong learning in Europe. However, there are 34% which are less convinced and 9% which disagree.

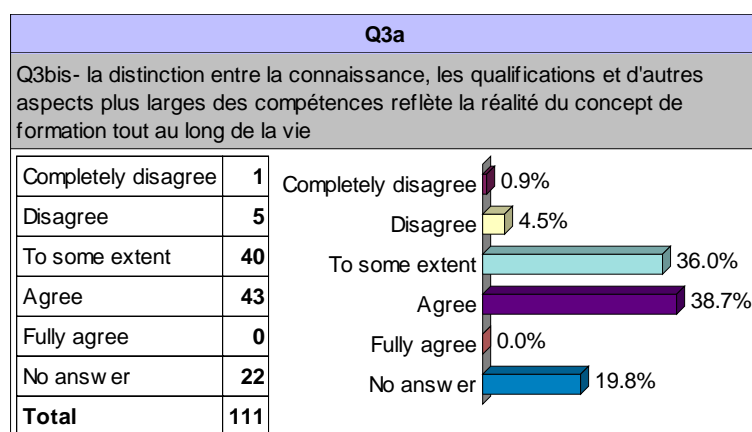
In this context, one could in fact identify the following main issues:

- The approach proposed by the Commission is too linear and hierarchical. It seems to imply a parallel progression in the 3 areas of knowledge, skills and competence - whereas, in the real world a person may be at level X in relation to his/her knowledge, but Y in so far as his/her relevant skills are concerned and, why not, at level Z regarding his/her (professional, personal, social, ...) competences. This remark (too much "linear") has been made very strongly by respondents as diverse as the Parisian Chamber of Commerce and Industry (75), the Swedish National Council for Adult Education (35), the French-speaking part of Belgium (96), with Slovakia (90) raising the question of "borders" (the "grey zones" between 2 levels), the Danish Association for Engineers (13) wondering about possible overlaps between levels and Austria (84) and Romania (72) asking for a stronger differentiation.
- The approach proposed by the Commission does not help those with an initial low level of qualification - the "entry" level. To a large extent, according to some respondents, it seems that this group has been left out from the EQF (UK-DES/80, EARLL/111, SQ/33, etc.)
- In so far as the descriptors have been presented, some respondents are claiming that some specific revisions should be introduced. For example, EAEA(86) considers that the descriptors should be more learner oriented, whereas the Czech Republic (88) considers that too much importance has

been given to social and general competence - in other words that the Commission's proposal has neglected the professional competence. The Chamber of Commerce and Industry of Paris (75) considers that some descriptors in the Commission's proposal are overrated (management) whereas one should introduce descriptors such as "innovation and creativity". In the same vein, the Youth Forum (82) considers that skills and experience gained through voluntary work are not, in the Commission's draft, openly and explicitly recognized as being part of non-formal and informal learning - a position that is close to that of the Swedish National Council for Adult Education (35), which states that the draft does not take enough into account non formal and informal learning (a similar position is taken by Latvia/48, which considers that too much weight is given to knowledge. Similarly, some feel that too much importance is given to skills such as problem solving (SSMA/5).

This distinction between knowledge, skills and competences is quite well reflected in the following table:

T14A/Q3bis: The distinction between knowledge, skills and wider aspects of competence reflect the reality of lifelong learning.



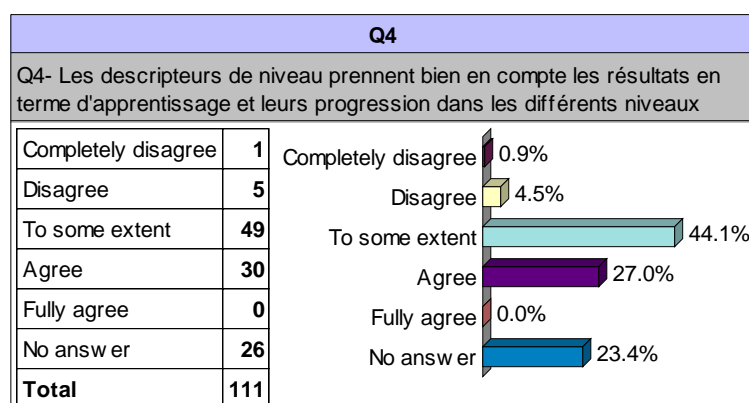
38% of respondents consider that this distinction reflects in an appropriate way the reality of lifelong learning, while 36% have more reserves about such a position. It is important to note that no respondent does fully agree with that and that 4,5% fully disagree.

- In addition, some specific request have been addressed to the Commission in relation to the list of descriptors and, more generally, to this entire exercise. For example, the Netherlands (43) consider that language skills should be added (this is also the position of QAA/34). Lithuania (94)

expresses the same remark vis-à-vis "ethical skills", which are as important as the cognitive, functional and personal skills.

Coming to the descriptors, see the following table:

T15A/Q4: The level descriptors adequately capture learning outcomes and their progression in levels (overall answers).



Only 27% of the respondents agree that the level descriptors adequately capture the complexity of lifelong learning in Europe. The position is more reserved for 44% of the respondents. It is also important to note that no respondent does fully agree with that and that 4,5% fully disagree.

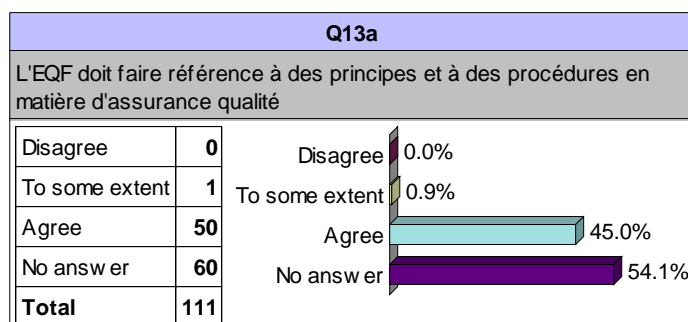
Over and beyond these remarks, there is the underlying request that a number of definitions are made more precise and are clarified: what does the Commission mean by "standard of learning outcome" (Norway/81), by "credit transfer volume" (Ireland/93)? For its part, France (58) considers that there is a lack of internal coherency, resulting from the fact that the approach presented by the Commission aims at classifying individuals (and not the qualifications). In this context, a large number of respondents stated that table 2 of the draft should be removed: it is input-oriented (Austria/84), it should be part of NQF (Lithuania/94), etc.

EQF and Quality Assurance

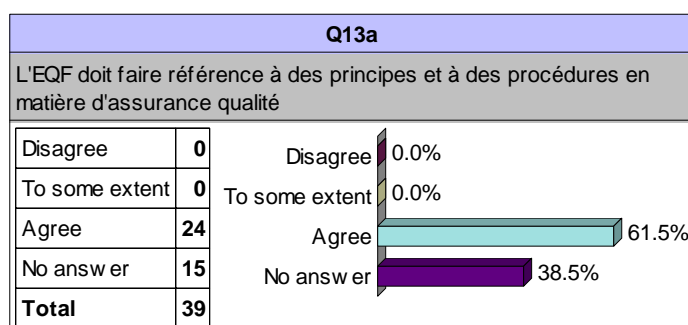
Nearly all the respondents who have expressed an opinion about the link between EQF and Quality Assurance have considered the latter as playing a crucial role for the success of the former, to the point of having one respondent (The Association of Danish Economists/79) stating that QA is the only thing that matters and with the Scottish Executive (6) declaring that QA is vital!

The following table shows the results to quite specific questions regarding this issue:

T16A/Q13a: EQF must make reference to quality assurance principles and procedures (overall answers).



T16B/Q13a: EQF must make reference to quality assurance principles and procedures (overall answers).



If one excludes the 54% of no answer to that question, the respondents which have answered to that question do all agree with the necessity that EQF has to make reference to quality assurance principles and procedures. This statement is even reinforced by the respondents from Ministries and regional authorities.

Having said that, some respondents wondered about the criteria to be used (in relation to EQF) for Quality Assurance (EfVET/47), with FEANI (36) suggesting the development of Quality Assurance principles at European level, an approach supported by the QAA (34).

RESPONDENTS BY COUNTRY

Pays	N° id	Nom	Catégorie
EUR	42	Sport Sector	Autres
EUR	54	Polifonia - AEC	Autres
EUR	107	EFHA	Autres
EUR	111	EARLALL	Autres
EUR	83	BFUG (Bologna Follow Up Group)/DES	Bologna Follow up Group
EUR	1	UNICE	Employeurs
EUR	15	JEAPME Construction Forum	Employeurs
EUR	9	UEAPME	Employeurs
EUR	85	CEEP	Employeurs
EUR	24	ETUCE - Eroepean Trade Union Committee for Education	Travailleurs
EUR	41	CESI	Travailleurs
EUR	103	ETUC - European Trade Union Confederation	Travailleurs
FI	77	Ministry of education - Finland	Ministères
FL	112	Ministry of Education - Liechtenstein	Ministères
FR	75	CCIP	CCI(Chambres de commerce et d'indudtrie)
FR	55	APCM	CMAI(Chambres des Métiers et de l'Artisanat
FR	58	Ministry of Education - France	Ministères
FR	11	CIO EUROGUIDANCE	Réseau Institutionnel(Euroguidance, Naric.....)
GR	100	Ministry of Education - Greece	Ministères
HU	69	Hungarian Ministry of Education	Ministères
IE	93	DES - Ireland	Ministères
IT	38	Ministerio del Lavoro a delle Politiche Sociali (Ministry of Labour and of social policies)	Ministères
IT	64	Centro Risorsi Nazionale per l'Orientamento, CRNO	National Resource centre for Counselling
LT	94	Ministry of Education - Lithuania	Ministères
LU.	57	FHL	Employeurs
LU.	88	Ministry of Education - Luxembourg	Ministères
LV	48	Latvian Ministry of Education	Ministères
MT	95	Ministry of Education - Malta	Ministères
NL	62	NVAO	Association ou ONG Formation
NL	43	Dutch Ministry of Education, Culture and Science	Ministères
NO	81	Ministry of Education - Norway	Ministères
PT	99	Ministry of Education, Ministry of Labour, DGEPP, GAER, GRICES, DGES	Ministères
RO	72	Ministry of Education - Romania	Ministères
SE	35	Swedish National Council of Adult Education (Ministry of Education)	Ministères
SE	104	Ministry of Education	Ministères
SK	90	Ministry of Education - Slovakia	Ministères
SL	98	MoNE	Ministères
TR	28	Turkish Ministry of Education	Ministères
UK	25	Universities UK	Association ou ONG Education
UK	34	QAA Scotland	Association ou ONG Education
UK	4	NUCCAT	Association ou ONG Education
UK	7	UKHE - UK HE Sector Policy statement - Europe unit	Association ou ONG Education
UK	8	Universities Council for the Education of Teachers	Association ou ONG Education
UK	108	Association of Scottish Colleges	Association ou ONG Education
UK	21	EWNI Credit Forum	Autres
UK	12	Nursing Midwifery Council	Branche professionnelle nationale
UK	5	SSDA (Sector Skills Development Agency) - Skills for Business network	Branche professionnelle nationale

RESPONDENTS BY COUNTRY

Pays	N° id	Nom	Catégorie
UK	92	E-Skills UK	Branche professionnelle nationale
UK	16	Credit and Qualification framework for Wales	Certification body
UK	26	SEMITA - SCIENCE, ENGINEERING,MANUFACTURING, TECHNOLOGIES ALLIANCE	Employeurs
UK	23	NIACE	Etablissement d'enseignement pour adultes
UK	14	London Metropolitan University (Individual response)	Etablissement d'enseignement supérieur
UK	18	University of Surrey	Etablissement d'enseignement supérieur
UK	27	University of Luton	Etablissement d'enseignement supérieur
UK	29	University of Manchester	Etablissement d'enseignement supérieur
UK	37	University of Bath	Etablissement d'enseignement supérieur
UK	63	Aberdeen College	Etablissement d'enseignement supérieur
UK	74	York St John College	Etablissement d'enseignement supérieur
UK	78	University of Ulster	Etablissement d'enseignement supérieur
UK	105	Universities Scotland	Etablissement d'enseignement supérieur
UK	109	University of Leeds	Etablissement d'enseignement supérieur
UK	33	SCQF - Scottish Credit and Qualifications Framework	Ministères
UK	6	Scottish Executive	Ministères
UK	106	Scottish Qualifications Authority - SQA	Ministères
UK	80	DES-UK	Ministères
UK	30	Welsh Assembly Government	Régions-Collectivités territoriales
worldwide	56	ICMCI	Autres