



COMMISSION OF THE EUROPEAN COMMUNITIES

Brussels, 5.9.2006
SEC(2006) 1094

COMMISSION STAFF WORKING DOCUMENT

Accompanying document to the

Proposal for a

**RECOMMENDATION OF THE EUROPEAN PARLIAMENT
AND OF THE COUNCIL**

on the establishment of the European Qualifications Framework for lifelong learning

IMPACT ASSESSMENT

{COM(2006) 479 final}
{SEC(2006) 1093}

TABLE OF CONTENTS

| | |
|--|----|
| COMMISSION STAFF WORKING DOCUMENT Impact assessment on the creation of the European Qualifications Framework (EQF) | 1 |
| 1. PROCEDURAL ISSUES AND CONSULTATION OF INTERESTED PARTIES... | 4 |
| 1.1. Expert Group | 4 |
| 1.2. Consultation process | 4 |
| 1.2.1. Consultation within the Commission | 4 |
| 1.2.2. External Consultation | 4 |
| 1.3. Follow-up to the consultation | 6 |
| 2. PROBLEM DEFINITION – WHAT ISSUE/PROBLEM IS THE PROPOSAL EXPECTED TO TACKLE? | 7 |
| 2.1. Barriers to lifelong learning and the mobility of learners and workers | 7 |
| 2.1.1. The EQF and lifelong learning | 7 |
| 2.1.2. The EQF and international learner and worker mobility | 8 |
| 2.2. Political mandate | 10 |
| 2.3. Legal basis | 11 |
| 2.4. Subsidiarity and proportionality | 11 |
| 3. OBJECTIVES | 12 |
| 3.1. Consistency with other policies and objectives of the Union | 12 |
| 3.2. Policy objectives | 12 |
| 3.3. Operational objectives | 13 |
| 4. WHAT ARE THE MAIN POLICY OPTIONS AVAILABLE TO REACH THE OBJECTIVES? | 13 |
| 4.1. Option 1: no action | 13 |
| 4.2. Options 2 to 5 | 13 |
| 4.2.1. Option 2: a Commission Communication | 16 |
| 4.2.2. Option 3: a Commission Recommendation under Article 150 | 16 |
| 4.2.3. Option 4: a Council and European Parliament Recommendation, under Articles 149 and 150 of the Treaty | 17 |
| 4.2.4. Option 5: a European Parliament and Council Decision, under Article 150 of the Treaty | 17 |

| | | |
|------|---|----|
| 5. | ANALYSIS OF POSITIVE AND NEGATIVE IMPACTS OF THE FIVE OPTIONS | 17 |
| 5.1. | Advantages and disadvantages of Option 1: no action | 18 |
| 5.2. | Advantages and disadvantages of Option 2: Commission Communication | 19 |
| 5.3. | Advantages and disadvantages of Option 3: Commission Recommendation under Article 150..... | 19 |
| 5.4. | Advantages and disadvantages of Option 4: European Parliament and Council Recommendation under Articles 149 and 150 | 19 |
| 5.5. | Advantages and disadvantages of Option 5: European Parliament and Council Decision under Article 150 | 22 |
| 6. | COMPARING THE OPTIONS | 22 |
| 7. | MONITORING AND EVALUATION | 23 |
| | Information Note: qualifications, qualifications systems and qualifications frameworks | 25 |

1. PROCEDURAL ISSUES AND CONSULTATION OF INTERESTED PARTIES

Lead Directorate-General: DG Education and Culture

Other Involved Services: SG, MARKT, ENTR, EMPL, the European Centre for the development of vocational training (CEDEFOP) and the European Training Foundation (ETF)

Agenda Planning/Work Programme reference: 2006/EAC/006

The proposed *Recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning* is part of the Commission's Legislative and Work Programme for 2006.

Consultation and application of expertise

1.1. Expert Group

In November 2004 the Commission established an EQF Expert Group, composed of experts drawn from the Member States, the European social partners, Cedefop and the European Training Foundation. To ensure an integrated approach, the Group included representatives from vocational education and training, general, adult and higher education, and from employers, the trades unions and students. The Group's mandate was to advise the Commission in formulating a blueprint for an EQF to be used as a basis for an extensive consultation of relevant stakeholders throughout Europe.

1.2. Consultation process

1.2.1. Consultation within the Commission

On the basis of the Group's advice, the Commission prepared a draft EQF Staff Working Document which was submitted in June 2005 for Inter Service Consultation to the Legal Service, Secretariat-General, and DGs AGRI, BUDG, EMPL, ENTR, FISH, INFSO, MARKT, RTD, SANCO and TREN. On conclusion of the internal consultation, the Commission published on 8 July 2005 a Commission staff working document "Towards a European Qualifications Framework for Lifelong Learning" - SEC(2005) 957 - which presented a blueprint EQF for external consultation.

Additionally, an inter-service steering group (ISG) was established in November 2005; it included representatives of those DGs on whose remit the proposed EQF would have a bearing: the Secretariat General (SG) and DGs Internal Market (MARKT), Enterprise (ENTR) and Employment and Social Affairs (EMPL). The group met three times. Its members provided expert advice from the perspective of their DGs on the content, structure and objectives of the EQF.

1.2.2. External Consultation

On the basis of the Staff Working Paper referred to above, the Commission conducted a Europe-wide consultation of stakeholders, including the 32 Education and Training 2010 countries, the European social partners, European industry sectors and European education associations from July to December 2005. Each of these consultees in turn conducted

consultations of their own members or stakeholders. As part of the consultation, the UK Presidency, in co-operation with the Commission, hosted a conference on the EQF in Glasgow on 22-23 September, with the participation of over 220 European stakeholders. The conference gave strong backing to the idea of creating an EQF.

The Commission received approximately 120 responses to its consultation, which in many cases reflected extensive national and European consultations organised by the respondents – the actual number of organisations which individually participated was therefore much higher than the figure of 120 official responses to the Commission. The Commission contracted a professional consultant to analyse the consultation responses and produce a report detailing his findings. Further detail can be found at the EQF web pages:

http://ec.europa.eu/education/policies/educ/eqf/index_en.html

The consultation demonstrated that the EQF is seen as a constructive initiative which should contribute significantly to the transparency, comparability and transfer of qualifications at European level and stimulate national and sectoral reforms in support of lifelong learning. The replies showed broad 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;
- implementing the 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 broad support was conditional on further development and clarification of a number of points. In particular, stakeholders called for simplification of the reference levels, clarification of the EQF's relationship with the Bologna Process and with Directive 2005/36/EC on mutual recognition of qualifications, and how best to link national and sectoral qualifications systems to the EQF.

On the descriptors, there was some criticism among stakeholders of the third category, “wider professional and personal competences”. Many respondents felt this column too complex (4 sub-categories) and impractical. Others stated that the Commission's approach was too hierarchical and linear, and artificial as they placed a learner or worker at the same level across the knowledge, skills and competences descriptors, whereas in most cases people would be placed at different levels for each of the three. Views differed on the aims and content of the reference level descriptors – some respondents argued that they were too oriented to academic qualifications and should be readjusted to meet labour market needs more, while others argued that they moved too far away from academic qualifications.

On the relationship of the EQF to the Bologna Process, some stakeholders expressed concern that the EQF might run in parallel to the Framework for Qualifications in the European Higher Education Area or indeed supplant it altogether.

The results of the consultation were discussed at a conference in Budapest in February 2006 and at an informal meeting of European education Ministers in Vienna in March 2006.

The aims of the conference in Budapest, co-hosted by the Hungarian Ministry of Education and the Commission, were to discuss the outcomes of the consultation and generate discussions to inform the text of the Recommendation. Discussions in Budapest focussed on how the EQF could best be implemented and stakeholders' contributions were channelled through five workshops on the key topics: the reference level descriptors, the principles and criteria required to link national frameworks to the EQF, the principles and criteria required to link sectoral frameworks to the EQF, the EQF and the European labour market, and the EQF and individual citizens.

Participants gave broad support to the Commission's proposed approach, but called especially for an improvement of the reference level descriptors. The conference also concluded that the EQF reference level descriptors must be worded so as to be able to refer to the top vocational training and professional qualifications that would be placed at levels 6, 7 and 8, and that they should also include a very clear reference to the Dublin descriptors developed in the Bologna context.

On links to national qualifications frameworks, discussions supported the idea of establishing an EU-level co-ordination structure as part of the EQF recommendation. It is intended that this group will have a key role in ensuring transparency and consistency across countries and in improving the EQF over time. Stakeholders also emphasised that it would be crucial to establish contact and coordination points at the national level and that it would be necessary to agree principles in relation to quality assurance. All these suggestions have been incorporated into the EQF.

Participants also called for links to be established between learning outcomes-based *international* sectoral frameworks and the EQF in order to increase the transparency of international sectoral qualifications. The draft EQF legal text therefore proposes that *international* sectoral qualifications should be linked to the EQF and then to national qualifications frameworks. By contrast, *national* sectoral qualifications should be linked to the EQF via national qualifications systems. Participants also underlined the need for common quality assurance principles.

1.3. Follow-up to the consultation

In response to the request for simplification of the reference level descriptors, the Commission established a Technical Working Group to examine and clarify the reference descriptors and make them more operational. The Group, composed of experts from the countries participating in the Education and Training 2010 Work Programme and the European Social Partners, met three times in May and June 2006 to revise the descriptors. The final reference levels descriptor grid which forms part of the formal EQF proposal is the agreed result of this group's work.

Stakeholders, in their responses to the Commission Staff Working Document and at the Glasgow and Budapest conferences also requested Commission support for testing of the

EQF. In response, the Commission therefore launched a Call for Proposals under the Leonardo da Vinci programme in June 2006 to support those stakeholders who wish to work together on testing and developing the EQF and national and sectoral qualifications systems and frameworks.

2. PROBLEM DEFINITION – WHAT ISSUE/PROBLEM IS THE PROPOSAL EXPECTED TO TACKLE?

2.1. Barriers to lifelong learning and the mobility of learners and workers

Education and training are an integral part of the Lisbon Strategy, the EU's programme of reforms which seeks to meet the challenges of the knowledge society and economy. More specifically, the development of citizens' knowledge, skills and competences, through education and training, is critical to achieving the Lisbon goals of competitiveness, growth, employment and social cohesion.

The mid-term review of the Lisbon Strategy in 2005 concluded that these challenges are currently not being met. In particular, in the context of this paper, important barriers remain to the achievement of lifelong learning and to learner and worker mobility. There is therefore a need to develop instruments and cooperation mechanisms which can increase participation in lifelong learning and facilitate transfer of qualifications – between institutions, systems and countries. Increased transparency of qualifications is a prerequisite for this strategy and is necessary to the development of the knowledge, skills and competences required by Europe's citizens.

It is the purpose of the EQF to address these issues. It has two principal aims: to act as a translation device and a neutral reference point to compare qualifications and so facilitate their transparency, comparability and transfer throughout Europe. It is thus intended to complement and reinforce existing mobility instruments such as Erasmus, the European Credit and Transfer System for Higher Education (ECTS) and Europass. Secondly, it aims to be a catalyst for the reform of national education and training systems and the achievement of genuine lifelong learning.

Barriers to lifelong learning and mobility cannot be removed by action from individual Member States alone, but rather require bilateral, multilateral or EU-level action. The EQF therefore aims to provide added value in two broad areas: mobility and lifelong learning.

2.1.1. The EQF and lifelong learning

Lifelong learning is the guiding principle of the Education and Training 2010 Work Programme, which seeks to achieve the education side of the Lisbon goals. For example, the Brussels European Council of March 2005 concluded that lifelong learning is essential if the Lisbon objectives are to be achieved. In particular, the combination of technological and economic change and Europe's demographic challenges i.e. the ageing of the working population, make the practice of lifelong learning a necessity in the Member States.

The realisation of lifelong learning is however hindered by numerous barriers between institutions, systems and countries preventing access to, progression within and overall participation in education and training. Lack of transparency makes it difficult for individuals to choose the best education and training options and the absence of arrangements for the

transfer of qualifications prevents people from studying or working in other countries. This is well documented in recently published research notably that carried out by the OECD and Cedefop¹. Apart from obstacles related to financing, OECD² points to the following main obstacles to lifelong learning:

- a general lack of awareness among potential learners of existing learning opportunities
- highly fragmented and complex education and training provisions and delivery mechanisms;
- inflexible institutions and systems failing and refusing to address the needs of individuals;
- lack of arrangements for validation of prior learning;

These barriers and obstacles can to a large extent be attributed to a lack of transparency, lack of proper arrangements for transfer of qualifications and by incomplete systems for the recognition of learning outcomes. This position reflects a serious lack of communication and co-operation between education and training providers and authorities at national as well as at international level.

A number of related studies highlight the benefits of qualifications frameworks – both at national and international level - to lifelong systems and hence to learners and workers³. The research demonstrates that qualifications frameworks support lifelong learning by opening up access, clarifying progression routes and facilitating the validation of non-formal learning, and enabling a better match of qualifications to knowledge, skills and competences. A main feature of these frameworks is a sharpened focus on the overall co-ordination of education and training systems. A number of countries have already introduced comprehensive levels structures providing a common reference point for all education and training provisions and thereby reducing fragmentation and increasing transparency. Comparing the content and profile of learning outcomes from different institutions, systems and countries makes it possible to reduce the time spent by learners re-learning, provide support for quality assurance and the development of standards for systems of credit transfer and accumulation.

Studies specifically highlight the advantages to lifelong learning of establishing an *international* framework, such as the EQF. These include greater transfer, comparability and compatibility of qualifications, greater mobility, co-operation and exchange and the development of a shared language in the discourse on qualifications. The EQF, as a meta-framework, would facilitate lifelong learning for learners and workers by linking national qualifications systems and so making it easier to read across from one system to another.

2.1.2. *The EQF and international learner and worker mobility*

The lack of arrangements allowing citizens to transfer qualifications from one learning context to another can also potentially create barriers to worker and learner mobility.

¹ Cedefop (2004): Policy, practice and partnership: Getting to work on lifelong learning;

² OECD (2003) Beyond Rhetoric: Adult learning policies and practices.

³ For example the OECD report “Moving Mountains – How can qualification systems promote lifelong learning?” (OECD, 2005)

Directive 2005/36/EC currently facilitates the recognition of professional qualifications through the consolidation and simplification of 15 previous directives on recognition of professional qualifications adopted between 1975 and 1999. This directive also ensures the transparency of qualifications on the labour market through the certificate attesting the equivalence of a qualification obtained in another Member State with the national one (i.e. of the country whose labour market the migrant is entering).

However, in areas not covered by this directive, there are still barriers to the mobility of learners and workers.

Existing studies⁴ seem to confirm that the absence of systems for transparency, comparability and transfer of qualifications hinders mobility. This is a problem particularly in the field of vocational and professional education and training where the complexity of institutions and systems makes transfer and combination of qualifications difficult. This problem is exacerbated by the lack of established international co-operation mechanisms and credit transfer arrangements (the proposed European vocational credit system, ECVET, is intended to remedy this problem). The situation is somewhat better in the academic field where the Bologna process and ECTS have resulted in some progress.

Indicating that an absence of transparency hinders transfer, a report by L'Observatoire Thalys International⁵ demonstrated that a third of those workers interviewed thought that a greater transparency of qualifications would encourage mobility; this figure rose to 45% among managers. The study also states that mobility would be enhanced by a better matching of supply and demand for knowledge, skills and competences, which would enable employers to judge job offers more accurately. The European job mobility portal EURES cites the view of careers advisers that the lack of comparability of other countries' qualifications and learning achieved through their education and training systems (especially vocational training) is one of the most common problems confronted by employers.

Today's European labour markets offer many new opportunities for workers. To benefit from these opportunities, citizens often need to be mobile between jobs (occupational) and countries or regions (geographical). Surveys⁶ show that EU citizens strongly believe in the right to free movement and realise that geographical mobility can improve their job prospects. In practice, however, only 3% have moved at least once in the past to another country to work. The same percentage says that they are likely to move to another EU Member State within the next five years. Additionally, according to the European Labour Force Survey, the share of active working age citizens from the Member States currently resident (but not born) in another EU country is only 1.8% relative to the overall EU-25 working age population, indicating low levels of worker mobility. Geographical and occupational mobility in the EU remain rather limited, therefore.

The evidence available indicates, however, that mobility can enhance employability. For example, 25% of long-distance movers have seen their job situation or working conditions improve, while only 5% have seen these deteriorate. Further, moving to another country or region appears to improve the chances of finding a job for the unemployed or inactive. 59% of

⁴ See for example Cedefop (2005): Learning by moving.

⁵ "La mobilité des Européens", Observatoire Thalys International (2003)

⁶ "Europeans and mobility: first results of an EU-wide survey", Eurobarometer survey on geographic and labour market mobility (2005)

those who were unemployed in another EU country had found a job in the current year. Europeans are aware of the opportunities offered by mobility as a solution to unemployment – between 25 and 50% (depending on nationality) would be prepared to move to another EU country to find a job.

EU data also shows relatively low levels of job mobility in Europe. The average duration of employment in the same job is 10.6 years in Europe, compared to 6.7 years in the USA. However, changing employer seems to be the best way of acquiring new and different skills and therefore fostering the adaptability required in modern economies.

The need for mobility, the demand among Europeans for it and its benefits indicate the need for EU-level measures and instruments to facilitate this movement. The EQF is thus proposed as a practical measure to increase the transparency of labour markets via the comparability and transparency of qualifications.

2.2. Political mandate

The proposed EQF is an integral element of the Education and Training 2010 Work Programme, which seeks to achieve the education and training side of the Lisbon goals. The Commission prepared its blueprint for an EQF following repeated requests from the Member States, the social partners and other stakeholders.

The Lisbon European Council in 2000 concluded that an increased transparency of qualifications should be a key measure in adapting Europe's education and training systems to the demands of the knowledge society and the Barcelona European Council in 2002 called for both closer cooperation in the university sector and the improvement of transparency and recognition methods in the area of vocational education and training.

The Council Resolution of 27 June 2002 on lifelong learning⁷ invited the Commission, in close cooperation with the Council and the Member States, to develop a framework for the recognition of qualifications for education and training, building on the achievements of the Bologna process and promoting similar action in the area of vocational training.

The 2004 and 2006 Joint Reports of the Council and the Commission on the implementation of the Education and Training 2010 work programme stressed the need to develop a European qualifications framework.

In the context of the Copenhagen process, the Conclusions of the Council and the Representatives of the Governments of the Member States meeting within the Council of 15 November 2004 on the Future priorities of enhanced European Cooperation in Vocational Education and Training (VET) gave priority to the development of an open and flexible European qualifications framework, founded on transparency and mutual trust, which should stand as a common reference covering both education and training.

Most recently, the Brussels European Councils of March 2005 and March 2006 further underlined the importance of adopting a European qualifications framework.

The EQF is therefore a key measure to achieve the Lisbon goals.

⁷ OJ C 163, 9.7.2002, p. 1.

2.3. Legal basis

According to Article 149 of the Treaty, the Community shall contribute to the development of quality education by encouraging cooperation between Member States and, if necessary, by supporting and complementing 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. The proposed Recommendation aims to support Member States efforts to develop their education systems as well as their adult education provision by providing a common reference point for national qualifications frameworks.

Article 150 of the Treaty states that Community action shall support and supplement the action of the Member States and, in particular, as stated in paragraph 2 of the Article, improve initial vocational training, facilitate vocational integration and reintegration as well as to develop exchanges of information and experience on common issues. The objective of the proposal is to improve all these aspects of vocational education and training as it provides a common reference point for national qualifications frameworks that facilitates Member States' efforts to adapt their vocational education and training systems to meet the changes in the labour market and society in general.

The EQF is therefore proposed under both Articles 149 and 150 because it has a dual purpose encompassing both education and vocational training objectives and components which are of equal importance within the EQF's lifelong learning perspective.

2.4. Subsidiarity and proportionality

The EQF is therefore proposed under both Articles 149 and 150 because it aims to support lifelong learning and encompasses both education and vocational training objectives.

The subsidiarity principle applies insofar as the proposal does not fall under the exclusive competence of the Community.

The objectives of the proposal cannot be sufficiently achieved by the Member States for the following reasons:

The main function of the EQF is to facilitate translation between and comparison of qualifications awarded by national authorities. As a transnational problem this cannot be achieved by the Member States, in particular since the lack of mutual trust between national and sectoral stakeholders has been defined as one of the main problems causing lack of transparency and preventing transfer of qualifications.

Community action will better achieve the objectives of the proposal for the following reasons:

- The challenges related to transparency and the transfer of qualifications are shared by all Member States and cannot exclusively be solved at national or sectoral levels.
- If all 25 Member States were to negotiate bilateral agreements on the subject covered by this Recommendation with all other Member States separately and in an uncoordinated way, this would result in an extremely complex and non-transparent overall structure at the European level.

- The proposal provides a common reference point and shared framework for cooperation between Member States. These functions cannot be provided by action at the national level.

This proposal conforms to the principle of proportionality because it does not replace or define national qualifications systems and/or qualifications and leaves the implementation of the recommendation to the Member States. Existing reporting systems will be used, minimising the administrative burden.

3. OBJECTIVES

3.1. Consistency with other policies and objectives of the Union

“The Union must become the most competitive and dynamic knowledge-based economy in the world capable of sustainable economic growth with more and better jobs and greater social cohesion” (European Council, Lisbon, March 2000).

The current proposal contributes to the Lisbon goals of growth, employment and social cohesion:

- the Lisbon European Council in March 2000 recognised education and training as an integral part of economic and social policies, as an instrument for strengthening Europe's competitiveness worldwide, and as a guarantee for ensuring the cohesion of our societies and the full development of its citizens;
- the promotion of lifelong learning is necessary for the development of a competitive and sustainable European economy; the EQF will reduce barriers to lifelong learning by facilitating translation and communication between different national and sectoral qualifications systems;
- the Barcelona European Council in 2002 called for European education and training to become a world quality reference by 2010;
- in the context of the revised Lisbon strategy, the Employment Guidelines 2005-08 stress the need to ensure flexible learning pathways and to increase opportunities for the mobility of students and trainees, by improving the definition and transparency of qualifications and the validation of non-formal learning.

3.2. Policy objectives

The principal policy objectives are to facilitate lifelong learning and the geographical and occupational mobility of workers and learners. The EQF aims to increase access to, and participation and progression in, lifelong learning by reducing barriers to co-operation between education and training providers in different systems and between authorities in different countries and by facilitating greater communication between them. The EQF is also designed to increase the transparency and comparability of qualifications held by individual citizens, and so develop mutual trust; and thereby to promote the transfer and portability of qualifications between different national or sectoral contexts.

3.3. Operational objectives

The immediate operational objectives are to create a viable qualifications framework, consisting of 8 reference levels and reference level descriptors based on learning outcomes, for co-operation between countries, sectors and other stakeholders based on mutual trust; to establish a European-level advisory body to co-ordinate the relationship between national and sectoral qualifications systems; and to develop a set of principles, in particular on quality assurance, to ensure transparency and consistency across countries in order to build the mutual trust necessary for the functioning of the EQF.

The EQF would provide a framework to complement other mobility instruments such as ECTS, Erasmus, Ploteus and Europass.

4. WHAT ARE THE MAIN POLICY OPTIONS AVAILABLE TO REACH THE OBJECTIVES?

4.1. Option 1: no action

One policy option is to take no action and continue with the various existing arrangements and instruments.

In the area of regulated professions, Directive 2005/36/EC facilitates mobility for professionals who move to a Member State which regulates the profession for which they are qualified. The Directive provides for a system of automatic recognition of qualifications for professions whose conditions of training have been harmonised (doctors, nurses, midwives, dentists, veterinarians, pharmacists) and also for architects. For the other professions, the system is based on mutual trust. The underlying principle is that once a person is qualified to exercise a profession in a Member State this person should be authorised to exercise the same profession in another Member State. Statistics show that between 1997 and 2004, 53 843 decisions granting recognition were taken, 34 606 of which were delivered automatically.

Additionally, there are various bilateral and multilateral arrangements between Member States and existing Community transparency and mobility instruments such as Europass.

Member States would continue to cooperate where advantageous through bilateral agreements. Stakeholders would continue to use transparency and mobility instruments such as the framework for the transparency of qualifications and competences (Europass) and the European Credit Transfer and Accumulation System (ECTS) in higher education.

Taking no action would also mean not drawing any lessons from the failed implementation of Council Decision 85/368/EEC of 16 July 1985 on the comparability of vocational training qualifications. This Decision called for drawing up mutually agreed Community job descriptions for specific occupations or groups of occupations, to establish comparative tables, and to publish both in the Official Journal. The Decision also introduced a 5-level structure of training levels for vocational training which combined input and outcome factors. Based on this Decision a total of 219 VET qualifications in 19 sectors were compared and the results published in the Official Journal of the European Union. The centralised process of comparison, administered by Cedefop on behalf of the Commission, turned out as time and resource intensive. It also was unsustainable, because of the impossibility of taking account of the constant evolution of qualifications. The exercise was therefore eventually deemed to be

of limited value to stakeholders at Member State and sector level and consequently not continued.

The experiences gained from the 1985 comparability approach underline the importance of a voluntary and decentralised approach where decisions are left to competent bodies at national and sectoral level. This approach focusing on an increased transparency of qualifications is better suited to capture the increasing complexity of qualifications in Europe.

Moreover, when developing the EQF reference levels the experiences from using the 5-level structure of the 1985 Decision have been taken into account, in particular the need for a consistent learning outcomes based approach rather than combining input and outcome factors.

4.2. Options 2 to 5

Options 2 to 5 set out below all envisage the creation of an EQF. In each case, the EQF's content, structure and aims would be the same – but they would be proposed or introduced via different instruments. The options are set out by ascending degree of prescription or obligation on Member States, as determined by the respective legal instrument in each case.

Following extensive consultation, the Commission has devised the following blueprint for the EQF:

The EQF would act as a translation device for comparing qualifications and facilitating their transparency, comparability and transfer throughout Europe (that is, except for those areas covered by Directive 2005/36/EC on the recognition of professional qualifications. In these areas, Directive 2005/36/EC is the only legally binding instrument which confers rights and obligations on both the relevant national authority and the migrant).

The EQF would be based on a set of 8 reference levels of learning outcomes, covering all learning, including general education, VET, and Higher Education (8 was chosen as the most appropriate number of levels, following consultation with experts, as it was believed that this figure would best capture the full range of lifelong learning and be most suited to act as a meta-framework). The EQF would be supported by a set of principles/criteria agreed at European level - for example related to quality assurance and validation of non-formal learning. Member states and sectors wishing to use the EQF as a reference would need to accept these principles and criteria.

It is important to stress that the EQF is proposed as a meta-framework to act as a translation device between national qualifications systems; it would not replace national qualifications levels and is not intended to take over any of the established roles of national systems or frameworks.

The principal functions and components of the proposed EQF are set out in more detail below.

- the EQF's functions: translation device and neutral reference point

The EQF would act as a European framework, linking different national and sectoral systems and so acting as a translation device and neutral reference point for comparing qualifications and facilitating their transparency and transfer throughout Europe. Secondly, it would be a

catalyst for national reform of education and training systems and the achievement of lifelong learning. It would also involve promoting a major shift from the traditional focus on the structures and systems of education and training to defining and describing qualifications by learning outcomes i.e. what a learner can actually do, whether s/he has learnt this through formal education or non-formal learning.

- reference levels based on learning outcomes

The core component of the EQF would be a set of 8 reference levels of learning outcomes spanning general education, VET and higher education. The levels are organised into a grid of descriptors, consisting of 3 columns and 8 horizontal levels. Each of the 8 levels is defined by a set of statements (or descriptors) which divide learning outcomes into 3 columns titled “knowledge”, “skills” and “competence”.

The Commission believes that learning outcomes provide the only viable basis for the descriptors. Learning outcomes describe what someone can do or what s/he knows, and can therefore take account of the diversity of qualifications systems and so offer a neutral reference point to facilitate communication between the different qualifications systems in Europe. An inputs-based system – e.g. based on duration of study – would, by contrast, be incapable of meeting this vital requirement.

In their responses to the consultation, Member States agreed that learning outcomes should form the basis of the EQF descriptors – a learning outcomes approach would best accommodate the various characteristics and traditions of the different national systems and thus respect the principle of subsidiarity. Member States felt that an inputs-based approach would, on the other hand, have acted as a force for convergence of different national systems – which would be politically unacceptable.

Learning outcomes offer additional advantages: the EQF, in this sense, adheres to the principle that it is the result of learning that matters, not where or how the learning took place. The orientation towards learning outcomes should also make it easier to establish mechanisms for the transfer of learning which has taken place outside the traditional forms of education and training, for example by professional experience. The use of learning outcomes will facilitate movement not only between Member States, but also between different education systems. This will be a real contribution to putting lifelong learning into practice. The EQF will thus help those who wish to pursue their careers in different education and training systems and to build on the qualifications they have already acquired in the past.

The reference level descriptors take into account of the Commission proposal on the key competences which should be achieved by the end of compulsory schooling, while levels 5-8 are compatible with and contain references to the descriptors developed for the European Higher Education Area (EHEA), the “Dublin descriptors”.

It should be emphasised that the EQF level descriptors are not designed to describe specific competences or qualifications at national or sectoral level – this degree of detail would be provided in national or sectoral frameworks. In principle, therefore, a particular qualification would be placed at the appropriate EQF level via the relevant national or sectoral system/framework, rather than being directly compared to the EQF. The primary users of the reference level descriptors would be the bodies representing these systems and frameworks, rather than single organisations or institutions.

It is unlikely that there would be a perfect match between national levels (their number and their content) and the EQF levels – so using the reference levels would require a judgement of “best fit”.

- common principles and criteria: linking national and sectoral qualifications systems to the EQF

The EQF can only function on the basis of mutual trust. Creating an EQF requires that national authorities relate levels of qualifications consistently to the EQF, so that other stakeholders have confidence in these decisions. The EQF would not replace national qualifications systems and would not take over any of their established roles or functions.

Indeed, for the Commission the optimum solution would be for each country wishing to use the EQF to establish its own national qualifications framework (NQF), linked to the EQF reference levels. However, establishing an NQF would not be a requirement to link to the EQF.

Qualifications frameworks have been or are being established in many countries and sectors, in Europe and beyond. In Europe, France, Spain, Malta, Ireland and the UK (separate frameworks in England, N. Ireland, Wales and Scotland) have established frameworks. Additionally, a number of other countries are developing, or are considering developing, national qualifications frameworks. This category includes, for example, the Czech Republic, Hungary Germany and Austria. A majority of countries responding to the EQF consultation signalled that they are favourable to the setting up of a NQF.

Outside Europe, frameworks either exist already - for example in Australia, New Zealand and South Africa - or are being planned or discussed, for example in India, Mexico and South Korea.

These frameworks take many forms and appearances, according to national and sectoral requirements. Common to all is a wish to tackle the increasing complexity of modern education, training and learning systems. Their principal functions are to clarify for students, learning providers, employers and policy makers the main routes to a particular qualification, how progress can be made, to what extent transfer is allowed and on what basis decisions on validation are taken. Qualifications frameworks are also used for quality assurance and development purposes, providing a reference for improvement at local, regional, sectoral and national level. From the point of view of developing the EQF, there are lessons to be learned from experiences at the national level. While national systems and frameworks differ in detail, there are certain common features: most base descriptors on learning outcomes, establish robust systems for quality assurance, involve all national stakeholders in the creation and management of national frameworks and establish systems for the validation of non formal and informal learning.

Irrespective of the choice to set up a NQF or not, the Commission recommends that countries use a learning outcomes approach when describing and defining qualifications and establish a national EQF Centre which would support and coordinate the relationship between their system(s) and the EQF. This body would link levels of qualifications to the EQF reference levels, ensure the use of common principles for quality assurance, and publish a register of those qualifications related to the EQF levels.

For sectoral qualifications, the Commission would encourage international sectoral organisations to use the EQF as a reference structure for the design and development of internal training, but anticipates that the formal award of *national* sectoral qualifications would normally take place through the national qualifications authorities and frameworks. The Commission would support sectoral organisations acting at the European and international levels in relating their *international* sectoral qualifications to the EQF reference levels, based on transparent quality assurance arrangements.

The Commission would establish an EQF advisory group, composed of representatives of the national EQF centres, to monitor, guide and co-ordinate the relationship between national qualifications systems and international sectoral qualifications systems and the EQF. The group would advise the Member States and the Commission on Member States' progress in relating their national qualifications systems to the EQF, in particular the referencing of national and sectoral qualifications levels to the EQF levels and advise the Commission on issues concerning the relating of international sectoral qualifications to the EQF reference levels. It might be argued that the setting up of national EQF centres and a European Advisory group would create an additional administrative burden on the Member States. The implementation of the EQF will indeed require a certain commitment and effort by the Member States including a gradual shift towards a learning outcome based approach and the establishment of clear links between their national qualification levels and the EQF. It is not essential, however, that new administrative bodies should be established at national level. The role of national EQF centre can, of course, be allocated to an existing body. The challenge at national level will primarily be to ensure the necessary coordination of the existing national bodies responsible for qualifications. The Commission, supported by Cedefop and ETF, will provide administrative and technical support to the European Advisory Group.

- the EQF and the European labour market

The EQF would – through its function of supporting and facilitating the transfer of qualifications between different education and training systems – facilitate international labour mobility and contribute to a better match between supply and demand in the European labour market. The EQF will make it easier for employers and Chambers of Commerce, for example, to interpret the qualifications of foreign applicants.

- the EQF and the citizen: tools and instruments to support learners

An operational EQF would need to establish links to existing and emerging tools and instruments which support individual citizens, such as Europass, ECTS and Ploteus. Additionally, the EQF would facilitate the validation at the national level of non-formal and informal learning, that is learning take place outside formal education and training institutions, for example at work or in voluntary or leisure activities.

4.2.1. Option 2: a Commission Communication

Under this option, the Communication would simply set out the proposals for the EQF outlined above, specifying tasks for the Member States and the Commission. The Council could choose to respond with Conclusions if it wished. A Commission Communication is not a legal instrument under the Treaty and a Commission Communication on the EQF would not require commitments from Member States to implement the EQF at the national level.

4.2.2. *Option 3: a Commission Recommendation under Article 150*

Under this option, the Commission would put forward, under Article 150 of the Treaty (which applies to vocational training), the proposals on the EQF outlined above and set out recommended actions for both itself and the Member States. However, this would not cover Article 149 (education) which is an essential component of the EQF. Also, a Commission Recommendation is a legal instrument, but it does not involve the Member States or the European Parliament in the formal adoption of the instrument.

As a legal instrument, a Commission Recommendation would therefore formally go beyond a Commission Communication on the EQF, but not to the extent of requiring political commitment from the Member States to implement the EQF at the national level.

4.2.3. *Option 4: a Council and European Parliament Recommendation, under Articles 149 and 150 of the Treaty*

This option entails adopting a Recommendation under Articles 149 (which applies to education) and 150 (vocational training) to establish the EQF, as outlined above, to be used by Member States on a *voluntary* basis. The EQF is based on both Articles 149 and 150 because it has a dual purpose, comprising components and encompassing objectives for both education and vocational training which are of equal importance within the EQF's lifelong learning perspective. Also, a Council and European Parliament Recommendation is a legal instrument, and under this option the Member States and the European Parliament would participate fully in the legislative procedure. A Council and European Parliament Recommendation would go beyond options 2 and 3 in requiring a political commitment from the Member States to implement the EQF at the national level.

4.2.4. *Option 5: a European Parliament and Council Decision, under Article 150 of the Treaty*

Under this option, a Decision of the European Parliament and of the Council under Article 150 (which applies to vocational training) of the Treaty would establish the EQF as outlined above. However, once again this would not cover Article 149 (education) which is an essential component of the EQF.

A Decision is a legal instrument adopting principles and would involve Member States and the European Parliament in the legislative procedure. A Decision on the EQF would differ from a Recommendation in that it would decide on the objectives, principles and mechanisms of the EQF at the European level, and at the national level for those Member States which relate their national qualifications systems to the EQF. It would therefore be more prescriptive in stipulating what actions would be carried out by Member States and more stringent in its requirements for compliance from the countries.

5. ANALYSIS OF POSITIVE AND NEGATIVE IMPACTS OF THE FIVE OPTIONS

An analysis of the impacts, positive and negative, of the five options considered is set out below; it identifies the problems and objectives the Commission is seeking to achieve, and defines a set of criteria against which the impacts can be assessed.

| Problems identified | Objectives | Indicators |
|---|---|--|
| Uncoordinated or non-existent relations between different national and sectoral qualifications systems. | Levels of qualifications linked to EQF through national qualifications systems by 2009. | Meta-framework established to link systems to facilitate communication and translation between systems. |
| Barriers between and within education and training systems hinder citizens' access to lifelong learning. | Increase citizens' access to and participation and progression in lifelong learning. | Greater participation by citizens in lifelong learning. Member States' lifelong learning strategies include national qualifications frameworks. |
| Non-formal and informal learning are currently not granted sufficient recognition. | Increased development of systems for the validation of non formal and informal learning at the national level and greater use of the common European principles. | An increased number of citizens whose non-formal and informal learning has been assessed and validated. |
| Mobility - geographical and occupational - is hindered. | Facilitate citizen mobility for purposes of learning and working. | Greater movement of learners and workers between systems and countries. |
| Insufficient transparency and comparability of international sectoral qualifications in national systems. | Facilitate acceptance of international sectoral qualifications by supporting sectors at European level in linking to national qualifications levels through the EQF levels. | Sectoral organisations at European and international levels reference international sectoral qualifications to the EQF levels. National systems and labour markets accept international sectoral qualifications. |

5.1. Advantages and disadvantages of Option 1: no action

This option suggests addressing the problems identified by accepting a system of bilateral and multilateral arrangements between Member States and sectors without EU involvement. Potential positive impacts could include immediate, practical, solutions for some Member States and sectors, for example in the transfer of qualifications. Additionally, such an approach would entail little or no cost to the Commission and would not require the establishment of European-level bodies to co-ordinate or oversee processes e.g. in the field of quality assurance.

There are existing instruments which aim to enhance transfer of qualifications. However, Europass does not enable the comparability of levels of qualifications. The Directive on mutual recognition of qualifications *does* enable the comparability of levels of qualifications by Member States (through the five levels of qualifications that have been fixed) as well as by the labour market (through the certificate of equivalence of the foreign qualification and the

national one). However, the Directive applies only to regulated professions - there would still be no change for occupations which do not fall within the scope of the Directive.

But this option would not adequately address the assessment criteria. Multilateral or bilateral arrangements would not be underpinned by a Europe-wide set of criteria necessary to achieve the consistency required to promote mutual trust across the EU. In a European Union of 25 (and growing) Member States a system of bilateral agreements would result in a complex and opaque set of arrangements. While in some cases such an approach might offer solutions, the replication of such arrangements across the EU would be more problematic. Bilateral/multilateral arrangements could therefore support and supplement but not replace a Europe-wide solution.

Additionally the no-action option would neither foster sectoral developments nor the validation of non-formal learning.

Further, the no-action option would be unacceptable to many stakeholders – calls for a qualifications framework extend back to 2002 and the Commission has a clear mandate from the Member States to develop an EQF and would hinder the development of European education and training systems and European labour markets.

5.2. Advantages and disadvantages of Option 2: Commission Communication

A Communication from the Commission would not meet the criteria. As a non-legal instrument, it would simply be too weak to initiate the construction of an operational EQF. In effect, it would take the EQF little further forward than the discussion stage already achieved through the 2005 staff working document and at the Glasgow and Budapest conferences described above.

A Communication would preclude any role for the Member States and the European Parliament in its adoption and thus reduce the standing and credibility of the eventual EQF.

It would not require commitments from Member States and so neither they nor the Commission would be motivated to take the concrete measures for its implementation. A Communication would not therefore create the structures and systems of co-operation necessary for the establishment of an EQF.

Further, Member States would not be encouraged or given incentives to reform aspects of their educational systems, in particular the development of national qualifications frameworks established on a learning outcomes basis.

Its additional positive impacts would therefore be limited. However, its negative impacts would be considerable. Member States, social partners and other stakeholders would be disappointed with the limited influence of a Communication, after investing considerable time and effort in responding to the Commission consultation and participating in the two conferences.

5.3. Advantages and disadvantages of Option 3: Commission Recommendation under Article 150

A Commission Recommendation, under Article 150, would not meet the criteria. It would have the major disadvantage that it would not cover Article 149 (education) which is an essential component of the EQF. Also, although a legal instrument, it is unclear whether it

would have a stronger impact than Option 2. Similarly, it would not require Member State or European Parliament involvement in the formal adoption of the instrument. The initiative would not therefore generate the political commitment to implementation at the national level, which is crucial to the success and continued momentum of the EQF. It would lack the necessary political standing and thus effectiveness with the Member States, who have worked closely with the Commission in developing the EQF.

It is therefore unlikely that, at a practical level, a Commission Recommendation would result in Member States taking the measures necessary to establish the infrastructure or achieve the implementation of an operational EQF.

5.4. Advantages and disadvantages of Option 4: European Parliament and Council Recommendation under Articles 149 and 150

It is expected that this option should be able to address all the issues and problems identified and achieve the set objectives. Firstly, the EQF should be proposed under both Articles 149 and 150 because it has a dual purpose, comprising components and encompassing objectives for both education and vocational training which are of equal importance within the EQF's lifelong learning perspective. It supports education and vocational training by encouraging mobility through citizens' transfer of qualifications between national systems and between general education, higher education and vocational training.

Secondly, positive impacts would be achieved at the European and national levels, for the citizen and outside the EU. Stakeholder feedback - at the national, European and sectoral levels - has overwhelmingly called for the EQF to be implemented on a *voluntary* basis. It would be the solution most acceptable to the Member States and would be in accordance with the principle of subsidiarity under the Treaty and proportional in its requirements and impact.

Crucially, Member States would maintain the political investment they have held in the EQF from the earliest stages of its development rather than being excluded from the legislative process as they would under option 3. A European Parliament and Council Recommendation under both Articles 149 and 150 would therefore be the most appropriate legislative instrument.

Moreover, there is a history of using such Recommendations to achieve objectives in fields related to the EQF, for example:

- the Draft Recommendation of the European Parliament and of the Council on Key competences, Commission proposal COM(2005) 548 of 10.11.2005;
- the Draft Recommendation of the European Parliament and of the Council on a European Quality Charter for Mobility, Commission proposal COM(2005) 450 of 23.9.2005;
- the Recommendation of the European Parliament and of the Council 2006/143/EC of 15 February 2006 on further European cooperation in quality assurance in higher education (OJ L 64 of 4.3.2006, p. 60), based on Commission proposal COM(2004) 642 of 12.10.2004.

In addition, there are several older examples in the field of education and training, including the 2001 Recommendation on European cooperation in quality evaluation in school education

and the 2001 Recommendation on mobility within the Community for students, persons undergoing training, volunteers, teachers and trainers.

- Better communication and translation between Member States' national qualifications systems

Creating and implementing the EQF would enable levels of qualifications from different national systems to be linked to the EQF reference levels, thus establishing a network of related qualifications systems across Europe, which would communicate with one another and enhance transparency and transfer of qualifications. A genuinely European meta-framework based on voluntary cooperation would be created. Member States would designate a national EQF centre to support and coordinate the relationship between the national qualifications system and the EQF. The framework would be supported by an EU-level co-ordination structure or advisory group, drawn from representatives of the national EQF centres. This body would help to ensure transparency and consistency across countries and so facilitate a greater degree of transfer of qualifications. Agreeing a set of criteria, principles and mechanism for quality assurance would foster the mutual trust necessary if a decision of one Member State to relate a particular national qualification to a specific EQF level were to be trusted by another Member State.

- Increased access to, and participation and progression in, lifelong learning.

By establishing a common reference point, the EQF would reduce barriers to co-operation between education and training providers in different systems and between authorities in different countries, and so facilitate greater communication between them. This would facilitate access to, and participation in, education and training. Learners and workers would be supported in combining qualifications from different systems and so be able to pursue lifewide and lifelong learning and move more easily within the European labour market.

- Increased validation of non-formal and informal learning

An EQF established on a voluntary basis and based on learning outcomes, would serve to support countries in developing methods and systems for the recognition and validation of non-formal and informal learning. The EQF would both support ongoing work across Europe (a majority of countries are active in this field) and encourage the use of the common European principles agreed in the conclusions of the Council of 28 May 2004. In particular, the focus on learning outcomes promoted by the EQF would benefit citizens by accelerating development of validation of non-formal and informal learning.

- Increased learner, worker and citizen mobility

An EQF would act to complement and reinforce the existing European mobility instruments such as Europass, Erasmus, ECTS. The EQF would make it easier for learners to describe (for example in the European CV) their broad level of competence to recruiters in other countries. By facilitating such comparability and transfer of qualifications, the EQF would make it easier for citizens to move between jobs and countries. In practical terms, the Commission would, for example, propose that new qualifications and Europass include by 2011 a visible reference to the appropriate EQF level.

The EQF level will be visible when a diploma is recognised under Directive 2005/36/EC as equivalent to the national requirements for access to one of the 800 regulated professions in

the EU-25. In such cases, the differences between the levels of qualifications established for the purpose of the EQF (8 levels) and the levels established for the purpose of Directive 2005/36/EC (5 levels) could confuse employers and render access to a job more difficult. Indeed, these migrants would submit to potential employers two documents which may attest different levels of qualifications:

- The certificate, delivered in accordance with Directive 2005/36/EC⁸, attesting the equivalence of their qualifications with the national one and
- The diploma indicating the EQF level which may or may not correspond with the EQF level of the host Member State (a migrant's qualification may be at the same level or at a higher or lower level than the national one).

Situations may therefore occur where these two documents contradict each other and where the equivalence established by the Directive is put in question by the diploma referring to an EQF level. This is all the more important considering that, in the area of regulated professions, employers, who are only authorised by regulation to recruit citizens holding a specific qualification, may pay a particular attention to the qualification and to the certificate of equivalence.

However, for the EQF to have a positive impact, a reference only in Europass documents would be insufficient. While important for promoting transparency of qualifications, Europass would be used by a limited proportion of the population holding qualifications and thus cannot ensure a general use of the EQF. Referring to the EQF level in all new qualifications by 2011 will allow for a gradual but more generalised and effective implementation than merely using the Europass.

Therefore, despite the risk of confusion in the areas covered by Directive 2005/36/EC, the mention of the EQF level on all new qualifications is essential.

Proper information to the relevant stakeholders should limit the negative impact which the mention of the EQF level on the qualifications could have in the above cases.

- Development and greater transparency and transfer of national and international sectoral qualifications

The Recommendation would seek to encourage Member States to link both their national and sectoral qualifications systems to the EQF. Formal award of national sectoral qualifications would take place via the national system, while sectors acting at the European and international levels would reference international sectoral qualifications to national

⁸ Under the system of recognition of Directive 2005/36/EC, national authorities are under the obligation to recognise qualifications from other Member States classified at the same level as the national qualification and also qualifications from other Member States classified at the level which is immediately below. Therefore, for instance, under the Directive, a Belgian optician holding a qualification attesting training which is not carried out through higher education will have his qualification recognised (following compensatory measures) at the same level as the French qualification attesting two years higher education. The same will arise, for instance, for a German or Danish chiropodist moving to Greece, or a Dutch, Portuguese or Belgian pharmaceutical technician also moving to Greece. Once the migrant has obtained the recognition of his qualification under the Directive, he has access to the national labour market with a certificate attesting the equivalence of his qualification with the national one.

qualification systems via the EQF levels. The Recommendation would therefore facilitate the design and development of sectoral qualifications and their greater transfer at the national, European and international levels.

- Reform of national systems

While the EQF would be implemented entirely voluntarily, many Member States have already signalled – in their response to our consultation and at the conference in Budapest - their intention to establish national qualifications authorities and frameworks which would be linked to the EQF. In many cases, countries have indicated their NQFs will be based on learning outcomes.

- Impacts outside the EU

Although the proposed legislative instrument would be a Recommendation of the Parliament and Council, and therefore applicable to the 25 Member States, it should be emphasised that 32 countries participate in the Education and Training 2010 Work Programme, in which the EQF is a key element. The additional 7 countries - Bulgaria, Romania, Turkey, Croatia, Norway, Iceland and Lichtenstein - have been active in participating in the development of the EQF, including via the Commission's consultation, attending the two conferences and in the work of the Technical Working Group on reference levels. Some of these countries have already begun to develop national frameworks, partly in response to the potential implementation of the EQF. Those countries seeking accession to the EU would undoubtedly benefit from such early preparatory work in linking their qualifications systems to the EQF. Further, countries such as Russia and Canada, in the context of their G8 membership, have shown interest in using the EQF as a common reference point for example, in developing their own qualifications systems, especially in the context of comparing the qualifications of migrant workers.

Potential negative impacts include the possibility that, because of its voluntary nature, Member States might choose not to relate their qualification systems to the EQF or that, in introducing the EQF, they would not abide by the established criteria and procedures and that this might in turn hinder transparency and undermine mutual trust. It may be that countries choose to implement an NQF that could be difficult to relate to the EQF. Additional uncertainties would be the potential slow pace of implementation of NQFs, which might hinder a truly Europe-wide meta-framework.

5.5. Advantages and disadvantages of Option 5: European Parliament and Council Decision under Article 150

The Decision option would offer solutions to some of the problems identified. It would facilitate better communication and translation between Member States' national qualifications systems, increase mobility and facilitate greater validation of non-formal and informal learning.

However, there are a number of problems with using a Decision under Article 150 to introduce the EQF. It would have the major disadvantage that it would not cover Article 149 (education) which is an essential component of the EQF. Also, in general, a Decision is more prescriptive than a Recommendation. A Decision would adopt principles and obligations for those Member States which relate their national qualifications systems to the EQF. The overwhelming consensus among stakeholders, by contrast - expressed in responses to the

consultation and at the conferences in Glasgow and Budapest - is that the implementation of an EQF should be entirely voluntary and that it should entail no legal obligations. Member States and other stakeholders might object to the increased burden of obligations stipulated in a Decision. Additionally, to a great extent, the EQF's impact on assisting the reform of national systems and in influencing developments outside the EU is likely to depend on its status as an entirely voluntary framework.

Decisions in the area of education and training policy have been rare, and have mainly been used to authorise financing of programmes.

For all these reasons, a Decision would therefore be difficult politically.

6. COMPARING THE OPTIONS

| | No action | Communication | Commission Recommendation (Article 150) | EP and Council Recommendation (Articles 149+150) | EP and Council Decision (Article 150) |
|--|---|--|---|--|--|
| Both education and training? | N/A | Yes | No | Yes | No |
| More effective communication and translation between systems. | No. | To a limited extent only - political commitment would not be sufficient. | Unlikely – would depend on commitment of Member States | Yes | Only if accepted by MSs – in terms of subsidiarity, which is far from certain. |
| Increased access by citizens to and participation and progression in lifelong learning. | No barriers would remain; E & T systems would still be confusing and complex to learners. | Unlikely on a significant scale. | Depends on commitment of Member States - unlikely on a significant scale. | Yes. | Yes. |
| Development of systems for the validation of nonformal and informal learning at the national level | Not systematically; only indirectly as a by-product of bilateral arrangements | Would be patchy in application and limited in impact. | Would probably be patchy in application and limited in impact. | Yes. | Yes. |
| Greater learner and worker mobility | No. | Limited. | Would depend on Member States' commitment. | Yes. | Yes. |
| Increased development and acceptance of sectoral qualifications | No. | Limited - political commitment would not be sufficient. | Limited. | Yes. | Unclear at this stage. |

7. MONITORING AND EVALUATION

Monitoring and evaluation of the EQF's success in meeting its objectives will be continuous. The EQF, if adopted by the Parliament and Council, would not be set in stone, but would instead be kept under review and form the basis for further development. The Commission would monitor the implementation of the EQF and report, five years after its adoption, to the European Parliament and the Council, on the experience gained and consider the implications for the future, including if necessary a review of the legal instrument.

The following indicators will enable the Council, Parliament and Commission to determine if the EQF's objectives have been reached:

- all Member States use the EQF as a common reference point for qualification levels and individual qualifications;
- the adoption of national qualification frameworks by all Member States based on learning outcomes as a part of national lifelong learning strategies;
- the implementation of national qualification frameworks based on transparent procedures and quality assurance mechanisms;
- improved access, progression and participation in lifelong learning;
- all Member States introduce methods and systems for validation of non-formal and informal learning leading to generalised access to this form of recognition;
- the inclusion, by 2011, of a clear reference to the appropriate EQF level on all qualifications awarded and all “Europass” documents issued;
- increased acceptance and take up of international sectoral qualifications by national qualifications frameworks using the EQF as the reference point.

Annex I Definition of key terms

For the purposes of the EQF Recommendation, the definitions which apply are the following:

- (a) ‘qualification’ means a formal outcome of an assessment and validation process and is obtained when a competent body determines that an individual has achieved learning outcomes to given standards;
- (b) ‘national qualifications system’ means all aspects of a Member States’ activity related to the recognition of learning and other mechanisms that link education and training to the labour market and civil society. This includes the development and implementation of institutional arrangements and processes relating to quality assurance, assessment and the award of qualifications. A national qualifications system may be composed of several subsystems and may include a national qualifications framework;
- (c) ‘national qualifications framework’ means an instrument for the classification of qualifications according to a set of criteria for specified levels of learning achieved. This aims to integrate and coordinate national qualifications subsystems and improve of transparency, access, progression and quality of qualifications in relation to the labour market and civil society;
- (d) ‘sector’ means a grouping of professional activities on the basis of their main economic function, product, service or technology;
- (e) ‘international sectoral organisation’ means an association of national organisations, including for example employers and professional bodies, which represents the interests of national sectors;
- (f) ‘learning outcomes’ means statements of what a learner knows, understands and is able to do on completion of a learning process and are defined in terms of knowledge, skills and competence.
- (g) ‘knowledge’ means the outcome of the assimilation of information through learning. Knowledge is the body of facts, principles, theories and practises that is related to a field of study or work. In the European Qualifications Framework, knowledge is described as theoretical and/or factual.;
- (h) ‘skills’ means the ability to apply knowledge and use know-how to complete tasks and solve problems. In the European Qualifications Framework, skills are described as cognitive (use of logical, intuitive and creative thinking) and practical (involving manual dexterity and the use of methods, materials, tools and instruments).
- (i) ‘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/or personal development. In the European Qualifications Framework, competence is described in terms of responsibility and autonomy.