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ANNEX III
Revision of the European Qualifications Framework

Accompanying the document

**Communication from the Commission to the European Parliament, the Council, the
European Economic and Social Committee and the Committee of the Regions**

A NEW SKILLS AGENDA FOR EUROPE:
Working together to strengthen human capital, employability and competitiveness

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ANNEX III

REVISION OF THE EUROPEAN QUALIFICATIONS FRAMEWORK

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REVISION OF THE EUROPEAN QUALIFICATIONS FRAMEWORK (EQF)

1. INTRODUCTION

In today's and tomorrow's world, people need a higher and broader set of skills to work, communicate, access information, products and services and for social and civic participation.

A proper understanding and valuing of skills available is fundamental to support individuals to acquire and update skills throughout their life, moving between different types and levels of education, between education and employment and across countries and thus facilitate a better match between supply of skills and the needs of the labour market.

Qualifications express what people know, understand and are able to do. They can take different forms such as a diploma or certificate. Transparency about what people actually learned in order to obtain a qualification through a qualification ('learning outcomes') is key to ensure that individuals and employers give the appropriate economic, social and academic value to qualifications.

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Differences between education and training systems in the EU make it difficult to assess what someone - holding a qualification from another country – knows, understands and is capable of doing in learning or work contexts. Insufficient understanding hampers 'trust' in quality and content of qualifications acquired in another Member State. The same goes for qualifications awarded outside the formal system and by international bodies and organisations. This hinders professional development, recruitment and promotion opportunities and further learning opportunities for workers and learners with this type of qualifications, creating barriers to worker and learner mobility in the EU within and between borders.

To cope with these differences we need a mechanism that can compare national qualification systems and ensure that the learning outcomes of each qualification can be easily understood and compared. Such mechanism was created through the European Qualifications Framework for lifelong learning (EQF)¹, established in 2008 through a European Parliament and Council Recommendation. Its aim was to improve the transparency, comparability and portability of people's qualifications in Europe.

This Annex provides the analytical base underpinning the Commission proposal for the revision of the EQF Recommendation (as introduced in section 2 of this Staff Working Document. It presents briefly the challenges and problems with the current state of play. Subsequently, it attempts to provide effective solutions by proposing a number of policy options for which the envisaged impacts are analysed. Specific stakeholder consultations on the revision of the EQF Recommendation were held with the EQF Advisory Group on 19 January 2016 and with the EU social partners on 20 January 2016. The proposals are made in the context of the initiative New Skills Agenda for Europe. The revision seeks to strengthen

¹ OJ C 111, 6.5.2008, p.1.

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the use of the EQF, ensuring its original objective is fully achieved, and to broaden its scope, enhancing comparability of qualifications awarded in the EU and qualifications awarded in Third countries.

2. BACKGROUND AND STATE OF PLAY

The European Qualifications Framework (EQF) Recommendation has created a common reference framework of eight European generic levels of learning, which serves as "translation grid" between national qualifications systems. All types and levels of qualifications are covered and each level is defined in terms of learning outcomes, understood as knowledge, skills and competence. Level 1 presents the lowest level of proficiency, level 8 the highest. In principle all possible ways of learning can lead to the learning outcomes of a particular level, including the learning taking place in non-formal and informal contexts. The comparison of national qualification levels to the eight EQF levels is done through a process called "referencing". In this context qualifications are first included in a National Qualifications Framework (classifying national qualifications and their levels) and then, through the EQF translation grid, their levels are compared across the EU.

The 2008 Recommendation invited Member States to:

1. Relate their qualification systems and levels to the eight levels of the EQF by 2010.
2. Indicate EQF levels on newly issued certificates/diplomas and or certificate/diploma supplements by 2012.

A total of 39 countries currently participate and have committed to the EQF. Early 2016 22 Member States and 5 non Member States had finalised the process of referencing their national qualifications levels to the EQF, signalling commitment to its overall objective of transparency and comparability. In addition, 3 Member States had presented an initial referencing report still awaiting endorsement by the EQF Advisory Group. 3 remaining Member States had planned referencing in 2016. With the exception of Italy all countries have referenced their qualifications levels to the EQF through national qualifications frameworks. Early 2016 a total of 15 countries were putting EQF levels on certificates and diplomas with a rapid increase expected by the end of 2016.

Independent evaluations of the EQF Recommendation were carried out on behalf of the European Parliament² and on behalf of the Commission³. The evaluations address the period 2008-2012 and assessed the relevance, effectiveness, efficiency, coherence, impact and sustainability of the EQF. Based on the results of the evaluation the Commission reported to the European Parliament and the Council on the implementation of the EQF Recommendation.⁴The development of national qualifications frameworks, their orientation and impact

The EQF has been an important catalyser for the development of national qualifications frameworks organising the qualifications systems from the different national education and

²

http://www.europarl.europa.eu/meetdocs/2009_2014/documents/cult/dv/esstudieurqualifframewimplem/esstudieurqualifframewimplemen.pdf

³<http://ec.europa.eu/ploteus/sites/eac-eqf/files/DG%20EAC%20-%20Evaluation%20EQF%20-%20Final%20Report%20-%20Final%20Version.pdf>

⁴ COM(2013) 897 final

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training sub-sectors around one same framework and bringing closer together stakeholders from education, training, employment and youth work. This dialogue is a fundamental step for more coherent national educational systems and it has contributed to the modernisation of education and training policies and practices.

A national qualifications framework (NQF):

An instrument for the classification of qualifications according to a set of criteria for specified levels of learning achieved, which aims to integrate and coordinate national qualifications subsystems and improve the transparency, access, progression and quality of qualifications in relation to the labour market and society.

An NQF focussed on learning outcomes organises qualifications according to levels of proficiency of pre-established learning outcomes. Different types of qualifications can be placed at the same level in one framework, illustrated for example by the allocation of advanced VET qualifications at the same levels as university bachelor and master degrees in several countries.

Before 2004, when initial work on the EQF started, only three countries, France, Ireland and the UK, had set up NQFs. By 2016, 43 qualifications frameworks have been set up in the 39 countries taking part in the EQF cooperation.

Box 1 presents the situation as regards European NQF developments. Changes since 2014 are indicated.

Box 1. NQF developments⁵ Some Figures

- ✓ **35** countries are working towards or implementing **comprehensive NQFs** covering all types and levels of qualifications (34 in 2014).
- ✓ **4** countries have introduced **partial NQFs** covering a limited range of qualification types and levels or consisting of frameworks operating separately from each other: CZ, FR, UK-England/Northern Ireland, and CH.
- ✓ **17** countries have got **fully operational frameworks**: BE-Flanders, CZ, DK, DE EE, FR, , IS, IE, LT, LU, MT, NO, NL, PT, SE, CH and the UK England/Northern Ireland, Scotland and Wales) . This is a significant increase since 2014 when only 7 countries belonged to this category⁶. These 17 countries have **21 different frameworks**, including the three regions of Belgium (with separate frameworks for Flanders, Wallonia and the German Speaking Community) and three in UK nations (England/Northern Ireland, Scotland and Wales).
- ✓ **6** countries reached **an early operational stage** of their NQFs: EL, HR, LV, MO, SK and TK). These countries have completed the initial design and adoption of their frameworks. As their practical implementation is still on-going, their benefits and visibility to end-users are still limited.
- ✓ **3** countries are in the process of **legal adoption** of their frameworks: ES, FR, HU.

⁵ Cedefop. Briefing note Qualifications frameworks in Europe, January 2016
<http://www.cedefop.europa.eu/en/publications-and-resources/publications/9109>

⁶ Analysis and overview of national qualifications frameworks developments in European countries, annual report, 2014.
<http://www.cedefop.europa.eu/en/publications-and-resources/publications/6127>

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- ✓ **33** countries have proposed/adopted **eight-level frameworks** (29 in 2014). The remaining countries operate with five, seven, nine, ten and twelve levels.
- ✓ **27** countries have now referenced their NQFs to the EQF (23 in 2014).
- ✓ **24** countries have self-certified their link to the Qualifications framework for European Higher Education Area (Bologna framework) (23 in 2014), of which 15 jointly with referencing to the EQF
- ✓ **15** countries indicate EQF levels on certificates, diplomas or Europass documents (9 in 2014). CZ, DK, DE, EE, FR, IE, IS, IT, LV, LT, MT, NL, PT, NO and the UK (optional in the three frameworks England/Northern Ireland, Scotland and Wales).

Two studies carried out by Cedefop during the last decade (Cedefop, 2009⁷ and forthcoming, 2016⁸) demonstrate that there is a clear link between the development of qualifications frameworks and the adoption of more systematic national policies and practices on learning outcomes. Both studies reveal that once developed, the learning outcomes based descriptors of the NQF's become an important tool supporting qualifications reforms and practices. They are used to support the development and renewal of standards and curricula and are increasingly influencing assessment and teaching practices. The impact of the learning outcomes approach is exemplified by Estonia, Poland and Lithuania where the level descriptors of their NQFs has been used as reference points for development of new qualifications, for example advanced VET at level 5. In Belgium (Flanders), Bulgaria, Croatia, Slovakia, Portugal the NQFs have become an important reference point for the review and renewal of VET qualifications, curricula and assessment methods based on learning outcomes. Overall we can observe a clear strengthening of the learning outcomes approach in European education and training during the last decade, marking an important shift in the way education and training systems are conceptualised and governed.

While overall playing an increasingly important role, the degree of implementation of learning outcomes still varies between countries and education sectors. Where in e.g. France, Ireland, the Netherlands, the Nordic countries and the UK, the learning outcomes approach has for a long time been a key feature of the national systems, other countries like Bulgaria, Cyprus, Greece, Poland, Slovakia and Romania have only recently started to implement the principle. The approach is now firmly embedded in vocational education and training and higher education, but is used to a lesser extent in general education, in particular at upper secondary level.

2.1. The 2010 Milestone – Relating national qualifications systems and levels to the EQF

Four countries, Ireland, France, Malta and the UK completed their referencing within the 2010 deadline. These countries had established learning outcomes based national qualification frameworks prior to the adoption of the EQF Recommendation in 2008 and were thus able to carry out referencing without delay. Countries referencing after 2010 have done this on the basis of newly developed national qualification frameworks⁹ introducing explicit levels of learning outcomes, largely reflecting the principles introduced by the EQF. Using this new approach and bringing all levels and stakeholders together has been a very

⁷ Cedefop 2009. The Shift to Learning Outcomes: Policies and practices.

<http://www.cedefop.europa.eu/en/publications-and-resources/publications/3054>

⁸ Cedefop, 2016, Application of learning outcomes approaches across Europe, forthcoming.

⁹ Italy is an exception to this, referencing national qualifications directly to the EQF, without a NQF. The Czech Republic referenced on the basis of national classifications of educational qualifications types and the NQF for vocational qualifications.

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time consuming process and created delay in the referencing process. Table 1 shows how the referencing process has evolved since 2009, demonstrating a steady growth in the number of countries completing the referencing process.

Table 1 Overview of Referencing to the EQF

Year	Year of joining the EQF cooperation	Countries having completed referencing to the EQF	Countries in dialogue on referencing	Countries having updated referencing	Countries yet to initiate or complete referencing
2008	EU 27 + Croatia, Iceland, Liechtenstein, Norway, Turkey				
2009		Ireland, Malta			
2010		United Kingdom (England/Northern Ireland, Scotland, Wales), France			
2011		Belgium (Flanders), Czech Republic Denmark, Estonia, Latvia, Lithuania, the Netherlands, Portugal			
2012	Switzerland	Austria, Croatia, Germany, Luxembourg		Malta	
2013	Montenegro, FYROM	Belgium (Wallonia), Bulgaria, Iceland, Italy, Poland, Slovenia	Greece, Romania		
2014		Montenegro, Norway	Cyprus, Greece, Romania		
2015	Albania, Bosnia-Herzegovina, Kosovo, Serbia	Greece, Hungary, Switzerland	Cyprus, Romania, Slovakia	Estonia, Malta	
2016		FYROM	Cyprus, Kosovo, Romania, Slovakia, Sweden		Albania , Bosnia-Herzegovina, Finland, Liechtenstein, Serbia, Spain, Turkey

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The key purpose of the EQF referencing process is to contribute to increased transparency and comparability of national qualifications systems, including all levels and types of qualifications. Comprehensive qualifications frameworks provide a platform for national coordination, cooperation and involvement of all relevant stakeholders in the definition, review and renewal of learning outcomes.

Characteristics of referencing to the EQF can be summarised as follows:

- The majority of countries are aiming for a comprehensive referencing covering all types and levels of qualifications within the formal education and training system.
- Some countries have included qualifications acquired in non-formal context, notably addressing vocational and professional qualifications (for example Belgium (Flanders), Estonia, Slovenia).
- Only few countries have implemented practical and operational arrangements for the inclusion of non-formal qualifications awarded by companies, sectors and/or international bodies.
- The majority of countries assigned levels to blocks of qualifications without analysing each single qualification covered by their framework. A limited number of countries have started to assign individual qualifications to levels, potentially improving the precision of levelling. France, UK (England and Northern Ireland) and Switzerland have referenced their NQFs including VET/professional qualifications at all levels.
- Austria, Germany, Switzerland and France so far have not included in their referencing general education (including upper secondary school-leaving certificates giving access to higher education).

Table 2 shows the scope of the referencing process so far and the extent to which all levels and types of qualifications have been addressed.

Table 2 Scope of the referencing to the EQF

Scope of referencing	Countries	
Covering : <ul style="list-style-type: none"> all levels and types of qualifications including formal qualifications including non-formal learning (<i>private and/or international qualifications</i>) 	Ireland,	Sweden (tbc)
	the Netherlands	
Covering <ul style="list-style-type: none"> all levels and types of qualifications from the formal education and training system 	Belgium	Italy
	Bulgaria	Latvia,
	Croatia	Lithuania
	Cyprus (tbc)	Luxembourg
	Czech Republic	Malta
	Denmark	Montenegro
	Estonia	Norway
	FYROM,	Poland
	Greece	Portugal
	Hungary	Romania (tbc)
	Iceland	Slovakia (tbc)
Covering mainly <ul style="list-style-type: none"> vocational and professional qualifications 	France	Switzerland
	United Kingdom (England/ Northern Ireland)	
Not covering: <ul style="list-style-type: none"> general education including upper secondary school leaving certificates 	Austria	Germany
	France	Switzerland
Not covering <ul style="list-style-type: none"> qualifications from higher education 	United Kingdom (England/Northern Ireland, Wales)	

2.2. The 2012 milestone - EQF levels in qualifications documents

The overall delay in the referencing process has also caused the delay in meeting the second milestone of the EQF. By February 2016, a total of 15 countries had introduced level references in national qualifications documents (Denmark, Czech Republic, Estonia, France, Germany, Iceland, Ireland, Italy, Lithuania, Latvia, Malta, Norway, the Netherlands, Portugal and the UK). A total of 8 countries (Austria, Belgium-Flanders, Bulgaria, Slovenia, Hungary, Malta, Poland and Sweden) will start introducing references to EQF levels during 2016-17¹⁰.

¹⁰ Information communicated to the EQF Advisory Group

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Table 3 shows the types of qualifications documents containing references and indications regarding future implementation. The table also shows the extent to which EQF levels are presented on qualifications in national qualifications databases.

Table 3 Countries having included a reference to EQF-levels in qualifications documents and databases (February 2016)¹¹

General education qualifications	IVET and CVET qualifications	Europass certificate supplements	Europass diploma supplements	National qualifications databases
Denmark, Czech Republic, Estonia, Iceland, Malta	Denmark, Czech Republic, Estonia, Germany, Iceland, Ireland, Italy, Lithuania, Malta, the Netherlands, Portugal, United Kingdom (England/Northern Ireland, Scotland, Wales; optional)	Denmark, Estonia, France, Germany, Iceland, Ireland, Lithuania, Norway	Estonia, Denmark, Germany, Ireland, Latvia, Italy, Malta, Portugal	Czech Republic, Estonia, France, Germany, Lithuania, Malta, the Netherlands, Portugal, United Kingdom (England/Northern Ireland, Scotland, Wales)

No country has included reference to EQF levels in all qualifications documents. Progress has mainly been made in vocational education and training (IVET and CVET), to a lesser extent in general education qualifications. The inclusion of EQF levels in higher education qualifications is limited, reflecting that it is normally up to the (autonomous) institution itself to decide whether inclusion should take place.

3. CHALLENGES FOR THE FUTURE

A key objective of the EQF is to improve the understanding and comparability of qualifications. This is important as qualifications influence the ability of individuals to get jobs, to practice occupations, to pursue lifelong learning and to move between occupational sectors and countries. The ability to judge and trust a qualification is crucial not only to learners and workers but also to a number of other end-users like employers and educational institutions. The implementation of the EQF has contributed to this understanding, allowing for a better comparison of national qualifications systems and their levels.

Despite the successful implementation of the 2008 Recommendation on EQF, its objectives of transparency, comparability and portability of qualifications have not been fully reached. The state of play and challenges of these issues are addressed in this chapter.

¹¹ Based on Cedefop's survey: Implementation of national qualifications frameworks in Europe 2015.

3.1. Improving the comparability of qualifications systems

Referencing: The state of play¹²

The quality of information on the referencing process provided by countries varies, as does the scope of the referencing processes itself. Some countries could build on long-standing experiences with national qualifications frameworks and/or the use of the learning outcomes principle but many countries entered into the process without any prior experiences. The following observations can be made:

- National qualifications systems and qualifications are constantly changing due to internal and external factors. For the EQF to support comparison of national qualifications systems, the referencing process needs to be continuously updated to reflect adequately the changes in the national systems and qualifications. The current recommendation does not explicitly refer to the need for a continuous update (going beyond the existing two milestones) and constant improvement and deepening of the referencing.
- A few countries assign qualification per qualification to their NQF levels and consequently to EQF levels (Belgium, Hungary, Switzerland), allowing for a precise levelling of each qualification. In contrast, a majority of countries has assigned ‘blocks’ of qualifications (for example VET at upper secondary level) to their NQF levels and consequently to EQF levels. The actual level of learning outcomes of the qualifications within these ‘blocks’ can vary considerably, influencing the overall quality of the referencing process.
- The national referencing processes and reports have been documented to varying degrees, in some cases raising questions regarding the levelling of a particular qualification or ‘block of qualifications’. While some countries have put much effort into pilot-studies, research and active involvement of stakeholders, others have done so to a lesser degree. This directly limits comparability and the extent to which the levelling can be trusted.
- The ten referencing criteria have proved to be robust guides to the referencing process and thus supported overall comparability. However, in many cases referencing reports do not sufficiently document how the shift to learning outcomes have been taken forward (referencing criterion 3) and how this influences the levelling (criterion 2 and 4) and quality assurance (criterion 5) of national qualifications.
- As demonstrated above (table 2), the scope of the referencing process varies between countries. While the overall objective of the EQF is to cover all types and levels of qualifications, this has yet to be fully achieved. The lack of coverage of qualifications from general upper secondary education (school leaving qualifications) in countries like Austria, France and Germany exemplifies this. The majority of countries have chosen, in the first phase of EQF implementation, to include only qualifications awarded by the formal (predominantly public) education and training system. While only a few countries have included qualifications awarded by non-formal, private and/or international bodies, countries are generally aware that these qualifications need to be addressed in the coming period. These differences, reflecting the challenging tasks of developing comprehensive

¹² Information based on Cedefop's Inventory of National Qualifications Frameworks, <http://www.cedefop.europa.eu/en/publications-and-resources/country-reports/european-inventory-on-nqf>.

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NQFs, reduce overall comparability of national systems, notably related to private and international qualifications where transparency is a particular challenge and need.

The challenge of referencing:

The current Recommendation provides no guidance on how to improve the coverage and the systematic update of the referencing to the EQF. To provide a comprehensive picture of existing qualifications in countries, and thus to support European comparability of qualifications, the scope of the referencing reports must be broadened. Particular attention must be paid to complete the inclusion of formal education qualifications, private qualifications, international qualifications and the link with validation of non-formal and informal learning. This broadening of scope must be combined with systematic and regular updates, preventing the referencing from becoming obsolete. This broadening and deepening of the referencing process is an incentive to Member States to boost quality of qualifications and improve comparability, and thereby the relevance of the EQF to end-users.

3.2. Improving the transparency and comparability of single qualifications

Indicating the relevant EQF level in qualifications documents helps to position the qualification both in a national and European context. However, it does not provide information on the content, profile and quality of the qualification.

State of play:

Increasingly qualification certificates, diplomas and Europass documents contain a clear reference to their EQF level¹³. The EQF level of qualifications is also increasingly becoming part of information on national qualifications e.g. through national qualifications databases. While important, this basic information on the levels provides only a first starting point for comparing qualifications. For the EQF to become more relevant to end-users, additional information on the learning outcomes underpinning the qualifications – what a learner actually knows and is able to do – is required. A combination of information on levels and content/profile of qualifications will provide a strong basis for transparency and comparison.

The challenge:

Comparable information on the content and profile of qualifications and qualifications types that are part of national qualifications frameworks is only available to a limited extent. An internal study by Cedefop on the practical application of the learning outcomes approach in VET and higher education qualifications identified a number of challenges¹⁴:

- i. No agreed format exists for presenting information on single qualifications. The level of detail in the description of a similar qualification varies greatly from country to country complicating the comparison of profile and content of qualifications.
- ii. No common European format exists for the description of *learning outcomes*. The consequence is a considerable difference in the way the distinction between the different learning outcomes are treated and the way the complexity of learning

¹³ 15 countries indicate EQF levels on certificates, diplomas or Europass documents (9 in 2014). CZ, DK, DE, EE, F, IC, IE, IT, LV, LT, MT, NL, PT, NO and the UK (optional)

¹⁴ Cedefop, 2014, The writing of learning outcomes in VET and higher education, unpublished.

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outcomes is described. Learning outcomes statements of qualifications vary significantly in content and length (between 1 and 200 pages). Cooperation between different stakeholders is limited across sub-systems and national borders.

- iii. Information on the content of a qualification is difficult to find, not always accessible by the public or available in electronic format. While databases in some cases contain relevant information, they are often only partial, not including all qualifications. Language barriers and the lack of agreed presentation formats also reduce the relevance of this information to outsiders.

3.3. Improving the clarity of the descriptors of the EQF Recommendation

State of play:

Annex II of the 2008 EQF Recommendation relating to descriptors for the EQF defines three headlines for describing proficiency levels: knowledge, skills and competence. Whereas the definitions of knowledge and skills correspond to the general definitions of knowledge and skills of the EQF Recommendation, as laid down in Annex I of the Recommendation, this is not the case for the competence descriptor. The competence descriptor of Annex II is described in terms of "autonomy and responsibility", and is more limited than the general definition for competence as broadly used, namely "the proven ability to use knowledge, skills and personal, social and/or methodological abilities, in work or study situations and in professional and personal development".

The challenge:

One of the conclusions of the external evaluation of the EQF of 2013¹⁵ was that the competence descriptor as headline for the third column of Annex II of the 2008 EQF Recommendation causes confusion, because the use of the term competence in the 2008 EQF Recommendation is not consistent. A number of countries also have identified this as a problem and have chosen to describe the relevant part of their national descriptors differently¹⁶, to more precisely signal the scope of these descriptors.

3.4. Improving the transparency of qualifications awarded by private and international bodies

The offer of qualifications, diplomas and certificates available to citizens is increasing¹⁷. This includes qualifications awarded by private and international organisations and bodies. This is exemplified by the development and award of international qualifications where a variety of bodies, ranging from international organisations via multinational companies to sectorial organisations, are now active. An on-going study¹⁸ has identified 254 organisations awarding international qualifications in 21 different economic areas, amounting to the combined award of close to 4.5 million qualifications. The 2008 Recommendation stipulates that the EQF

¹⁵ <http://ec.europa.eu/smart-regulation/evaluation/search/download.do?documentId=9656454>

¹⁶ The following terminology is used for identification of the relevant parts of national descriptors (N=32 NQFs): 13 x competence', 9 x term autonomy/responsibility/accountability/independence, 2 x general competence, 2 x attitudes, 1 x to personal competence (as a headline covering social competence and autonomy), 1x social competence, 1 x transversal competence, 3 x a presentation of descriptors in one column, not using headlines to distinguish between learning domains.

<http://www.cedefop.europa.eu/sl/publications-and-resources/publications/6119>

¹⁷ Cedefop 2012 International qualifications: what they mean for citizens.

<http://www.cedefop.europa.eu/en/news-and-press/news/international-qualifications-what-they-mean-citizens>

¹⁸ ICF and 3S, Study on international sectoral qualifications systems and frameworks , Forthcoming 2016.

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should enable international sectoral organisations to relate their qualifications systems to a common European reference point and thus show the relationship between international sectoral qualifications and national qualifications systems.

State of play

The EQF referencing process has so far mainly addressed formal qualifications fully integrated (through legal and administrative decisions and agreements) into the national qualifications systems. As shown in table 2 in section 2.1, qualifications operating outside national jurisdiction, for example awarded by private and/or international bodies and/or companies, have only to a limited extent been addressed and included in national qualifications frameworks.

A Latvian study published in 2014¹⁹ shows that international qualifications take many forms and are awarded by different types of organisations. Some examples :	
Type or organisation	International qualification
International sectoral associations	The European Welding Federation
Sector initiatives	Banking Sector: <ul style="list-style-type: none">– The European Foundation certificate in Banking– 17 accredited institutes issued 7 500 certificates issued
International education centres	The American Hotel and Lodging Institute
International corporations and companies	Microsoft
International Institutions	The UN and its International Maritime Organisation

A survey carried out for the EQF AG in 2015²⁰ shows that a limited number of 8 countries have introduced criteria and procedures, including for quality assurance, for the inclusion of qualifications resulting from non-formal education and training. In the majority of cases these processes do not distinguish between private vendor qualifications and international (sectoral) qualifications.

¹⁹ <http://www.nki-latvija.lv/en/jaunums/the-study-international-qualifications-in-latvia>

²⁰ Monika Auzinger & Karin Luomi-Messerer, *Survey on International Sectoral Qualifications – Final results*, 28 February 2015.

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The three countries with a longstanding NQF in place have opened up towards qualifications awarded by a wide range of stakeholders, including private and international bodies. This is well illustrated by **France** where the inclusion of a qualification into the NQF is done according to a set of formal criteria but where the origin of the qualification (formal, non-formal or international) is of no relevance. The main question for inclusion is rather whether the qualification adds value and whether it fulfils the general criteria for inclusion and levelling to the French NQF. A similar approach can be observed in **Ireland and the UK** where qualifications awarded by both private vendors and international companies in principle can be included into the frameworks. In UK, Scotland more than 400 qualifications from non-formal contexts have been included (or 'credit rated') into the SCQF.

Some other countries with recently established NQFs created two sets of procedures. The **Netherlands and Sweden** exemplify countries where specific procedures have been put in place for the inclusion of non-formal qualifications, but where no pre-defined distinction between private vendor or international qualifications have been introduced. Both Sweden and the Netherlands have pointed to the important role played by non-formal qualifications in their countries and made it a priority to address these at an early stage of NQF implementation. Swedish authorities argue that the main added value of a NQF lies in its ability to increase transparency of non-formal qualifications; formal qualifications are already easy to overview.

The challenge

In spite of the intention of the EQF to cover all levels and types of qualifications, there is a lack of a clear procedure to reference non-formal and international qualifications to the EQF. This is particularly problematic for international qualifications. Currently, an international body has to approach each single NQF to ensure full European coverage. This leads to at least 39 different procedures for the same qualification, including the 39 different requirements for quality assurance arrangements. For many organisations and bodies this is not a realistic option, reducing the relevance and attraction of an EQF level and with it the implicit understanding of and trust in these qualifications. Furthermore this country-by-country approach entails the risk of the same international qualification being allocated different EQF levels in different countries, which could undermine the credibility of the EQF.

3.5. Quality assurance and credit systems: strengthening permeability, trust and facilitating progression

The objective of the 2008 Recommendation is to improve the portability of achieved learning outcomes between sub-systems of education and between education and training and the labour market, within and across regional and geographic borders. Qualifications influence the ability of individuals to get jobs, to practice occupations, to pursue lifelong learning and to move between occupational sectors and countries. The ability to judge and trust a qualification, and whether it actually can be exchanged into further education and/or employment, is crucial not only to learners and workers but also to a number of other end-users like employers and educational institutions. Understanding and trusting the quality and level of qualifications referenced to the EQF are essential to support this mobility.

- Trusting an NQF level and how it relates to the EQF requires the existence of transparent and robust quality assurance arrangements for qualifications and for the referencing process.
- Since NQFs aim to improve the transparency, access, progression and quality of qualifications in relation to the labour market and society, their success depends on their

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ability to support progression through access, admission and exemption, of individuals across institutional and national borders.

State of play in Quality Assurance

Quality assurance is a fundamental principle of the EQF and its referencing process. The EQF, in its role as a meta-framework, does not set standards for quality, nor does it prescribe how national quality assurance processes are to be implemented. However, in its annex III a set of common principles for quality assurance in Higher Education and VET have been set out. These principles build on the Council conclusions on quality assurance in VET of 23 and 24 May 2004, the Recommendation 2006/143/EC of the European Parliament and of the Council of 15 February 2006 on further European cooperation in quality assurance in higher education²¹ and on the standards and guidelines for quality assurance in the European Higher Education Area agreed by the ministers responsible for higher education at their meeting in Bergen. The Recommendation of the European Parliament and of the Council on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET) was established in 2009 and is fully compatible with these principles.

The EQF referencing criteria require the countries to illustrate that their quality assurance arrangements are consistent with relevant European principles and guidelines.

Challenges in Quality assurance:

In spite of the current focus on quality assurance in the referencing criteria and of the common quality assurance principles for HE and VET in Annex III some challenges remain:

- i. Quality assurance arrangements to review and monitor a) the use of learning outcomes and b) the assignment of qualifications to NQF levels needs to be further strengthened at national level. These arrangements need to be systematically addressed by the referencing process. Analysis of EQF referencing reports²² demonstrates that all countries have made an effort to present existing arrangements and institutions for quality assurance and how they link to European standards and guidelines (referencing criteria 5 and 6).
- ii. Despite the overarching nature of the EQF, quality assurance principles in EQF do not apply for all types and levels of qualifications. The current common quality assurance principles refer to quality assurance in general, and not specifically to qualifications referenced to the EQF. Furthermore, quality assurance principles in EQF (annex III of the 2008 Recommendation) only refer to VET and higher education, and do therefore not apply to qualifications resulting from general education, from the validation of non-formal and informal learning, the private sector or international qualifications (whether sectoral or not). This prevents trust between Member States across the full spectrum of qualifications. A qualification referenced to the EQF must always be

²¹ OJ L 64, 4.3.2006, p. 60.

²² Cedefop, Analysis and overview of national qualifications framework developments in European countries, annual report, 2014; <http://www.cedefop.europa.eu/en/publications-andresources/publications/6127>.

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based on transparent and robust quality assurance arrangements allowing end-users to judge the relevance of the particular qualification to their needs²³.

In **higher education**, Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG) have been revised in 2015²⁴. These revised guidelines state that "The qualifications resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the framework for Qualifications of the European Higher Education Area" (Standard 1.2).

A European Association for Quality Assurance in Higher Education (ENQA)²⁵ was set up in 2000, with the aim to disseminate information, experiences and good practices in the field of quality assurance in higher education, supported by the European Quality Assurance Register (EQAR). This is a register of those higher education quality assurance agencies that substantially comply with the ESG. Compliance must be demonstrated through an external review by independent experts. The main objective of EQAR is to provide the public with clear and reliable information on quality assurance agencies operating in Europe; the register is thus web-based and freely accessible²⁶.

In **VET**, EQAVET²⁷ is firmly established since 2009 as the European reference framework for quality assurance. It provides a *systematic approach* to quality assurance, promoting a culture of continuous *improvement* by combining internal and external evaluation with the use of indicators and qualitative analysis.

The 2012 Council Recommendation on **the validation of non-formal and informal learning**²⁸ asks that transparent quality assurance measures, in line with existing quality assurance frameworks are in place that support reliable, valid and credible assessment methodologies and tools. As demonstrated by the 2015 European Guidelines on validating non-formal and informal learning²⁹, an explicit focus on the learning outcomes approach as well as on the different stages of the certification process is essential in this area.

State of play of credit systems:

The 2008 EQF Recommendation points to the need for close links between the EQF and existing or future European systems for credit transfer and accumulation in order to improve citizens' mobility and facilitate the recognition of learning outcomes.

While the European Credit Transfer and Accumulation System (ECTS)³⁰ is already used in around 75% of higher education courses, the European Credit System for Vocational Education and Training (ECVET)³¹ is at an earlier stage. Both systems emphasise the importance of the learning outcomes approach in supporting the transfer and accumulation of qualifications and parts of qualifications.

²³ Quality assurance principles at European level for general education are subject to ongoing discussions in the context of ET2020

²⁴ <http://www.enqa.eu/index.php/home/esg>

²⁵ <http://www.enqa.eu>

²⁶ <https://eqar.eu/register/map.html>

²⁷ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2009:155:0001:0010:EN:PDF>

²⁸ OJ C 398, 22.12.2012, p. 1.

²⁹ European Guidelines on validation of non-formal and informal learning (2015).

<http://www.cedefop.europa.eu/en/publications-and-resources/publications/3073>

³⁰ http://ec.europa.eu/education/ects/ects_en.htm

³¹ OJ C 155, 8.7.2009, p. 11.

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According to a recent Cedefop study³², 17 European countries report that they have put in place a credit system that allow for accumulation and transfer of learning outcomes in vocational education and training. Credit systems have become integrated parts of NQFs in a few countries, notably Croatia, Iceland, Malta, Slovenia and the UK. 12 countries do not currently operate with credit systems in vocational education and training out of these only seven do not have any initiatives at system level. A majority of the 17 countries base their national credit systems on the principles agreed at European level.

A key purpose of the EQF is to facilitate mobility and progression of individual citizens. This progression can take many forms, for example between various levels of education and training, within and between sectors of education and training, between education and training and the labour market and within and across national borders. Existing credit systems are mainly operating within sub-sectors of education and training. As a consequence they often do not support progress across different levels and types of education and training as well as across national borders. This underlines the need to consider possible linkages and synergies between existing systems, raising the question whether a more comprehensive approach to credit transfer can be developed. The comprehensive character of the EQF and (most) NQFs makes it possible to more precisely identify relevant pathways and how these can be supported by credit transfer and accumulation.

Challenges for credit systems in the EQF

In spite of the existing European credit systems in higher education and VET the following challenges remain:

- i. The link between the EQF and the existing and emerging credit transfer approaches is missing and makes it difficult to create synergies at national and European level.
- ii. ECTS and ECVET have been developed in separation from each other and have so far not been explicitly linked to the EQF.
- iii. The majority of existing credit systems, at national as well as European level, operate within limited institutional contexts, normally VET or HE without connections to other contexts.

The main challenge is to connect these sector based systems through a set of principles promoting credit transfer across all levels and types of qualifications. These principles should have an explicit focus on improving the permeability of systems and reducing obstacles to the progression and mobility of learners. They should be explicitly linked to and support validation of non-formal and informal learning. There is a need to explore how credit systems can better support validation arrangements and whether these can complement each other in ways which promote progression of individuals³³.

³² Cedefop (2016), *Implementation of ECVET in Europe, monitoring report 2015*. Forthcoming.

³³ It is interesting to observe the distinction between identification, documentation, assessment and recognition of learning outcomes used by the Recommendation on validation; this point to a stepwise approach relevant to credit arrangements.

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3.6. EQF and qualifications awarded in third countries

Cultural differences, lack of understanding of qualifications and misperceptions lead to mistrust by EU companies when recruiting workers with non-EU qualifications. Conversely, Europeans going to work abroad may find similar obstacles.

Qualifications frameworks (national and regional) are rapidly emerging around the world as tools supporting mobility of learners and workers. According to an UNESCO, Cedefop and European Training Foundation (ETF) report, in 2014, more than 150 countries and territories were involved in the development and implementation of national³⁴ and regional qualifications frameworks³⁵.

Within this global development the EQF is increasingly considered an important international reference point for setting up national or regional qualifications frameworks. The EQF level descriptors have been a source of inspiration for regional and national qualifications frameworks being developed, such as for the ASEAN Qualification reference framework (ARQF)³⁶. Also an increasing number of third countries are looking for closer links between their frameworks and the EQF.

The challenge – lack of comparability of qualifications awarded in third countries and the EQF

The existing EQF recommendation does not provide any mandate for establishing relationships with third countries qualifications frameworks. This limits the ability of the EQF to improve comparability of European and third country qualifications which hinders labour market integration of migrants from outside the EU.

The state of play

> Countries with an association agreement with EU

Recently signed association agreements between the EU with Moldova³⁷, Georgia³⁸ and Ukraine³⁹ refer to the establishment of a national qualifications framework. The agreements with Georgia and Ukraine make a clear reference to the EQF Recommendation, suggesting *closer cooperation* between these countries and the EQF. The "*statut avancé*" between the EU and Morocco⁴⁰ mentions explicitly the possibility of an "approximation" (*rapprochement*) to the EQF.

> EHEA countries not in the EQF and not having an association agreement with the EU

The EQF and the QF-EHEA have been closely coordinated over the past eight years. The 2012 Bucharest Communiqué called on Bologna countries to ensure that upper secondary school leaving qualifications giving access to higher education would be considered as being linked to EQF level 4⁴¹. All EHEA countries that are not part of the EQF AG, namely

³⁴ <http://www.cedefop.europa.eu/en/publications-and-resources/publications/2213-0>

³⁵ <http://unesdoc.unesco.org/images/0024/002428/242887e.pdf>

³⁶ http://aanzfta.asean.org/uploads/docs/AECSP_Factsheets/AECSP_Fact_Sheet_AQRF_Apr15.pdf

³⁷ http://eeas.europa.eu/delegations/moldova/documents/eu_moldova/text_aa_dcfta_eneur-lex.europa.pdf

³⁸ http://www.eeas.europa.eu/georgia/pdf/eu-ge_aa-dcfta_en.pdf

³⁹ http://eeas.europa.eu/ukraine/docs/association_agreement_ukraine_2014_en.pdf

⁴⁰ http://eeas.europa.eu/delegations/morocco/documents/eu_morocco/feuillederoute-sa_fr.pdf

⁴¹ [http://www.ehea.info/uploads/\(1\)/bucharest%20communiqué%202012\(1\).pdf](http://www.ehea.info/uploads/(1)/bucharest%20communiqué%202012(1).pdf)

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Armenia, Azerbaijan, Belarus, Moldova, Ukraine, the Russian Federation and Kazakhstan, are developing comprehensive national qualifications frameworks and are preparing for self-certification to the Qualifications framework of the EHEA.

> Third country with mature qualifications frameworks

In 2014-15 three pilot projects exploring comparability between the EQF and three mature qualifications frameworks, namely the Australian Qualifications Framework (AQF)⁴², the New Zealand Qualifications Framework (NZQF)⁴³ and the Hong Kong Qualifications Framework (HKQF)⁴⁴ were completed. Despite the challenges of comparing an operational NQF with the EQF, it has been possible to establish comparability between the EQF and the three frameworks and their levels. The following lessons were learned during this exercise:

- When engaging into a technical comparison between the EQF and mature NQFs, the nature, purpose and the governance of the EQF and the relationships between the EQF and the European NQFs need to be carefully explained.
- The relationship between the EQF and the QF-EHEA needs careful explanation.
- The technical work is time and resource intensive.

> Other National Qualifications Frameworks across the world

The EQF is a reference in EU funded projects implemented outside the EQF countries, such as the India EU Skills Development project⁴⁵, the Indonesian Qualifications Framework and more recently a project enhancing the AQRF and ASEAN Regional Quality Assurance which in addition looks at harmonising ASEAN Higher Education and setting up an ASEAN-EU Credit Transfer System.⁴⁶ Individual countries from the Gulf Region (Bahrein, United Arab Emirates) have expressed interest in relating their qualifications frameworks to the EQF.

> Regional Qualifications Frameworks across the world

During the past years several regional qualifications frameworks have seen the light throughout the world⁴⁷. So far none of these have approached the EQF for closer connections. However, this may happen in the near future. Of the regional qualifications frameworks in place, the ASEAN Reference Framework (AQRF) offers the largest potential also given the strong links between the EU and ASEAN countries. Like the EQF it functions as a device to enable comparison of qualifications, to support recognition of qualifications, to promote the quality of education and training and to facilitate labour mobility.

4. COMPARISON OF OPTIONS FOR WAYS AHEAD

This section looks at the benefits and costs of three possible options for the further development of the EQF. The baseline scenario describes the situation when the EQF would not be further developed. Option 1 relates to the Strengthening comparability of qualifications through reinforced referencing. Option 2 concerns establishing referencing

⁴² <http://www.aqf.edu.au/>

⁴³ <http://www.nzqa.govt.nz/>

⁴⁴ <http://www.hkqf.gov.hk/guie/home.asp>

⁴⁵ <http://www.india-euskills.com/>

⁴⁶ http://eua.be/news/15-05-21/Launch_of_SHARE_%E2%80%9393_EU_support_to_ASEAN_higher_education_harmonisation.aspx

⁴⁷ See footnote 2.

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criteria and a mechanism to allow referencing of international qualifications and international sectorial qualifications frameworks to the EQF. Option 3 concerns comparability of qualifications awarded in the EU with third country qualifications. Option 2 and 3 both build on option 1 and are not mutually exclusive.

4.1. Baseline scenario

The implementation of the EQF, based on the 2008 Recommendation, and following the EQF-acquis adopted by the EQF Advisory Group such as the 10 referencing criteria, would be pursued in its current terms. Existing work on the implementation of the learning outcome approach, on the referencing of national qualifications frameworks to the EQF and updates of these and of the development of national qualifications databases, to be interconnected at European level, would continue and be further intensified through additional guidance and mutual learning. The same will probably hold for the indication of EQF levels on degrees, certificates and supplements. Under this scenario the comparability of individual qualifications and their transparency to learners, workers and employers will emerge slowly. However the EQF and NQFs can be used as an information source on the level of qualifications to make their recognition easier

The baseline scenario does not address the absence in the current EQF of quality assurance principles across all types and levels of education and training and the absence of common principles for credit transfer. There will be no provisions on cooperation with third countries (seeking comparability between the EQF and third country qualifications frameworks).

4.2. Option 1 Strengthening comparability of qualifications through reinforced referencing

This option focusses on how to systematically strengthen the quality and relevance of the comparison of qualifications made through the EQF, making sure that the framework can be trusted by end-users, be these individual citizens, public institutions or private employers. While this will require a continuous and systematic updating of the referencing already carried out, it will also require a **deepening and broadening** of the reach of the EQF, making it possible to acquire transparent information on qualifications not yet included in the EQF. Option one sets out the following measures strengthening the EQF:

More consistency in and updating of the referencing process

The Recommendation would invite Member States to ensure that referencing is regularly updated and carried out in a consistent way both on the system level and in relation to single qualifications. Updating should take place with a maximum interval of five years. It should aim for improved transparency of qualifications and for strengthened comparability of national qualifications systems. A further strengthening of the comparability of the systems will require a more systematic approach where the decisions of countries as regards allocating qualifications to NQF levels, and the basis on which these decisions are based, are systematically compared.

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Benefits	Costs
<ul style="list-style-type: none">- Enlarges credibility of NQFs and the EQF as a whole;- Ensures deepening and broadening of referencing, which increases its transparency and trustworthiness	<ul style="list-style-type: none">- More resource demanding for Member States

Acknowledgement of the referencing criteria by including them in the EQF Recommendation

The 10 EQF referencing criteria have been developed by the EQF Advisory Group in order to establishing a quality assurance mechanism for the referencing process. The criteria aim at ensuring trust and the involvement of all relevant stakeholders in the referencing process. They have also become a base of dialogue between the countries participating in the EQF.

Benefits	Costs
<ul style="list-style-type: none">- Improved clarity of the EQF Recommendation	<ul style="list-style-type: none">- Continuous efforts and resources by Member States to comply with reinforced referencing criteria

Common format for the description of qualifications and their learning outcomes

The information on qualification levels must be complemented by transparent information on the content (learning outcomes) and profile of qualifications for the EQF to become more relevant to individual citizens. Increased transparency requires, in addition to information on levels, a clear description of what the holder of a qualification knows, understands and is able to do. Furthermore for reasons of trust it is important to have information on the awarding body and is it desired to have some information related to quality assurance and if relevant credits.

The comparability of qualifications will be improved through the introduction of a common format for describing learning outcomes, to be developed with Member States and relevant stakeholders. Development of the common format will build on the experiences gained at national level as well as from the Europass certificate and diploma supplements. A common format could offer:

- A clear reference to the holder of the certificate (and not the provider or institution offering the training)
- A consistent use of action verbs to signal the complexity of the skills and competences
- A clear reference to the object and scope of learning
- An indication of the occupational/social context of the learning

These elements are today well known to most institutions, sectors and countries and would allow those involved to structure their descriptions in a clear way. To support European comparability, the learning outcomes presented through the common format should be provided in the national language as well as in English.

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While not replacing the formats and approaches already used at national and institutional level, this presentation format will facilitate comparison and sharing of information on qualifications at national and European level. The use of this common set of information by private and international qualifications would increase overall transparency and can be seen as an important contribution to ‘consumer protection’ in this area.

The common information to be used when presenting information on qualifications in databases, allowing for systematic exchange of information at national and international level would be based on optional and required data, which have already been developed in close cooperation with Member States in the context of the EQF Advisory Group and ESCO Member States working group.

Required data would include: title of the qualification, subject, country/region, EQF Level (if existing), description of the qualification (knowledge, skills, responsibility/autonomy or an open text field describing what the learner is expected to know, understand and able to do) and the awarding body.

Optional data would include: Credit points/ notional workload needed to achieve the learning outcomes, internal quality assurance processes, external monitoring body, further information on the qualification, source of information, link to relevant qualification supplement, URL of the qualification, information language, entry requirements, expiry date (if relevant), ways to acquire qualification and relationship to occupations

Both formats should influence and guide the future development of qualification supplements in Europass.

Benefits	Costs
<ul style="list-style-type: none"> - Allows for systematic sharing of learning outcomes based information between institutions and countries and will make it possible to better understand the content and profile of the qualification in question - Play a particularly important role in increasing transparency of private and international qualifications with high labour market value, where information on learning outcomes currently is scarce 	<ul style="list-style-type: none"> - Will require countries to invest in the preparation and update of qualifications descriptions including learning outcomes - Will require active promotion towards private and international awarding bodies

Clarifying the "competence" descriptor

A recurring confusion in discussions is caused by the different use of the concept 'competence' in Annex I and III of the 2008 Recommendation: annex I refers to the overarching definition of ‘competence’⁴⁸ as defined by and Annex II uses the more limited application of the competence concept as applied by the third column of learning outcomes descriptors. To eliminate this confusion the term 'competence' as heading of the third column in annex II would be replaced by the terms 'autonomy and responsibility' to be more faithful

⁴⁸ Competence is the proven ability to use knowledge, skills and personal, social and/or methodological abilities, in work or study situations and in professional and personal development.

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to the corresponding learning outcomes descriptors. This change of headline will not affect the EQF level descriptors themselves and the way these have supported the referencing of national qualifications levels to the EQF. By removing what has been seen as a conceptual inconsistency, the change will strengthen the learning outcomes approach promoted by the EQF.

Benefits	Costs
<ul style="list-style-type: none"> - More clarity of the descriptors, removing existing confusion 	<ul style="list-style-type: none"> - Some Member States may feel the need to modify the descriptors of their national qualifications framework when updating it

Allocating EQF levels to Common Training Frameworks

For the consistency of information and of referencing it is important that the EQF levels to be allocated to Common Training Frameworks through Commission Delegated Acts (based on article 49 of Directive 2005/36/EC) reflect the EQF learning outcomes descriptors corresponding to those levels.

Benefits	Costs
<ul style="list-style-type: none"> - Consistent referencing of qualifications complying with the common training frameworks across Europe - Clarity through a single entry point for the EQF levelling of Common Training Frameworks 	<ul style="list-style-type: none"> - Resources needed at national level to (develop and) reference national qualifications complying with the common training framework

Common quality assurance principles for all types and levels of qualifications that are to be referenced to the EQF

There is a need to generate mutual trust between institutions, sub-sectors of education and training and countries for the EQF to contribute to the reduction of obstacles to mobility and progression (in education and employment). A revised set of common principles would in particular draw attention to the role of quality assurance in underpinning all levels and types of qualifications referenced to the EQF. The focus on quality assurance of learning outcomes and certification would address the design of qualifications as well as the application of the learning outcomes approach and the process of certification, ensuring valid and reliable assessment according to agreed and transparent learning outcomes based standards. The quality assurance principles would be fully compatible with the European Standards and Guidelines for Quality Assurance in the European Higher education Area (ESG) in Higher Education and EQAVET in vocational education and training. Quality Assurance principles for General Education are under development.

Furthermore, for transparency purposes, the EQF Recommendation would recommend the European Commission to explore with Member States and stakeholders to establish a register of external monitoring bodies that comply with the common principles. The common principles require that quality assurance is based on self-assessment and external review. Depending on the national context, external review can be performed by public, semi public

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and private monitoring bodies. The external monitoring body would at least verify if the common quality assurance principles are applied. Depending on the type of qualification, more specific criteria (like the ESG) can apply. Again, depending on national contexts, awarding bodies can choose the external monitoring body. Both changes would imply a revision of Annex III of the current Recommendation.

Benefits	Costs
<ul style="list-style-type: none"> - Sets principles for QA for all types and levels of qualifications related to the EQF, including non-formal and international qualifications, enhancing the transparency and trust - Increased requirements to quality assurance of the certification process and in relation to learning outcomes will strengthen the quality leading to higher trust - The existence of a register with external monitoring bodies will make it more clear for awarding bodies what external monitoring bodies comply with requirements and will create transparency to the greater public on the quality of the awarding body 	<ul style="list-style-type: none"> - Increases the need to apply the Quality Assurance principles at national and European level and will thus require additional resources in countries where these principles would not yet be respected

Common principles for credit systems related to the EQF

A key purpose of the EQF is facilitating mobility and progression of individual citizens - between various levels of education and training; within and between sectors of education and training; and between education and training and the labour market and within and across borders and systems-. A set of common principles on the role of credit arrangements outlines a vision for cooperation in this area. These principles stress the need for qualifications frameworks and credit arrangements to interact, seeking to promote practical ways that allow learners, education and training providers and employers to better understand and compare qualifications. By giving credit to assessed and validated outcomes of previous learning they can support the validation of non-formal and informal learning, the combination of different learning experiences and flexible learning pathways.

Benefits	Costs
<ul style="list-style-type: none"> - The principles on credit systems push for credit systems to systematically interact supporting mobility across learning contexts - The principles on credit systems push for support to the validation of non-formal and informal learning to make better use of available skills 	<ul style="list-style-type: none"> - Not all countries operate credit systems reducing the relevance of the principles-

4.3. Option 2: Establishing referencing criteria and a mechanism to allow referencing of international qualifications and international sectorial qualifications frameworks to the EQF

The problem that the same international qualification can be referenced with two different EQF levels could be overcome by referencing international (sectoral) qualifications and frameworks directly to the EQF. This referencing would need to take into account the quality assurance principles for the referencing process and the new common quality assurance principle for qualifications referenced to the EQF. The referencing process would take place in full cooperation with Member States. The referencing result at EU level would fully respect the decision of each Member State to include, or not, the qualification in its national framework.

Benefits	Costs
<ul style="list-style-type: none"> - Can ensure coherent referencing of international qualifications by sharing of information and coordinated advice - Would save time by introducing one entry point to the EQF for international (sectoral) qualifications - Would ensure consistent referencing of international (sectoral) qualifications across countries and respect principles of quality assurance as established under the EQF 	<ul style="list-style-type: none"> - International qualifications could still have to be included into NQFs if Member States wish so - A European level solution will require additional human and financial resources at EU level

4.4. Option 3: Enhancing comparability of qualifications awarded in the EU with third country qualifications

Better comparability and understanding of the qualifications frameworks of third countries and the (types and levels of) qualifications that are part of them would extend the zone of trust between EQF countries and these countries. It would facilitate legal circular migration of skilled workers with these countries and easier recognition at home of returnee's qualifications obtained in EU countries. Increased transparency and mutual understanding can better support recognition practices. Through this it can support the EU migration agenda. Any process of enhancing comparability of the EQF with third country frameworks should be developed in accordance with the priorities for countries and regions set in the context EU external cooperation policies (e.g. in the context of the trade agreements, recognition and mobility). Option 2 requires the agreement on clear criteria for establishing these relationships with third country qualifications frameworks.

Under this option mechanisms are established through which the comparability of qualifications awarded in the EU and third country qualifications is enhanced, distinguishing between the following possible cases:

- Structured dialogues with EU Neighbourhood countries with an association agreement with the EU, possibly resulting in referencing of the NQFs concerned to the EQF in accordance with the EQF referencing criteria and principles for quality assurance;

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- Alignment of the EQF with mature national qualifications frameworks in the world including level-to-level comparisons;
- Alignment of the EQF with mature, regional qualifications frameworks in the world, including level-to-level comparisons;
- EU support (e.g. through development aid) to countries for developing NQFs.

Benefits	(Opportunity) Costs
<ul style="list-style-type: none"> - Improved understanding of qualifications from third country national or regional frameworks in Europe, and vice versa - Enhances the credibility of the EQF worldwide - Confirms position of EQF as an important international reference point - Opportunity for the EQF to set high standards in terms of quality assurance and learning outcomes requirements for qualifications frameworks worldwide 	<ul style="list-style-type: none"> - Resources needed in order to establish a dialogue, and draft risks and benefits analyses and comparability studies with the third country(ies) concerned - Risks of not establishing relationships with third country frameworks: <ul style="list-style-type: none"> o EQF could become isolated from regional frameworks and NQFs in other parts of the world, reducing the way the EQF can aid transparency and mobility for European citizens outside the EQF area o proliferation of links between third country qualifications framework and European NQFs which may lead to inconsistent interpretations of the EQF o less influence on global developments such as UNESCO initiatives

4.5. Conclusion on the comparison of options 1, 2 and 3

All three options ensure continuity of ongoing processes of referencing to the EQF and invested efforts and resources by Member States to do so, as does the baseline scenario. It is not possible to give exact estimates of the monetary benefits and costs of the different options.

The benefits of recommended actions under option 1 are that they will strengthen the trust, understanding and comparability of national qualifications both on the level of frameworks and systems and on the level of single qualifications. The use of standard formats for describing qualifications (including their learning outcomes) in databases on national and European level will make qualifications better comparable and thus better understandable and easier to access by employers and education and training providers. The common principles on quality assurance and on credit systems that are part of option 1 will be effective for easier transitions between education and training systems and between education/training and the labour market and thus all together improve the permeability of education and training systems. Easier transitions will also motivate people to engage in further learning with increased chances to enhance their employability.

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Most of the costs of the actions under option 1 relate to efforts and resources by Member States. In particular the regular updates of referencing and improving the qualifications descriptions.

Option 1 deepens and broadens the development that started further to the adoption of the 2008 Recommendation. Given the investment already done in the development of national qualifications frameworks, the transition to a learning outcomes approach and considering the fact that these efforts have been a strong national policy choice, it is assumed that the benefits of deepening and broadening this development will outweigh the cost of doing so. One could further assume that the opportunity costs for not engaging into option 1 are higher than the investment in human and financial resources of doing so. Not addressing risks of inconsistencies may undermine the credibility of the EQF in the long run.

The actions under option 2 will bring benefits of strengthening the transparency, understanding and comparability of international (sectorial) qualifications, in particular by enhancing their consistency in referencing through a common process ensuring that the same EQF level is attributed to the same qualification across the Member States. Costs of the actions under option 2 relate to efforts and resources by the European level and by Member States for referencing international (sectorial) qualifications to the EQF, in particular related to setting up common processes supporting such referencing. No unequivocal overall benefits/costs balance at EU and at national level can be given to option 2. The final benefits/costs balance will depend on how these common processes will be set up.

Option 3 has particular policy relevance with regard to migration, both to attract high skilled workers and with regard to the integration of migrants in Europe. Also here the costs relate to a large extent to the investment of resources to setting up robust processes to ensure trust and transparency in the comparability qualifications awarded in the EU and Third Countries. Given the current migration crisis the political benefits of doing so outweigh the costs in terms of resources.

Both options 1 and 3 should be pursued in the Commission proposal for the revision of the EQF Recommendation. Option 3 is included in the proposal given the current migration crisis the political benefits of doing so outweigh the costs in terms of resources. For option 2 the benefits/costs balance is more mixed. If option 2 is not retained in the proposal for a revised EQF, the continuity of the situation under the existing Recommendation should be maintained.