

EUA's Position on the Development of a European Qualifications Framework for Lifelong Learning¹

1. EUA welcomes the development of an overarching qualifications framework aimed at promoting transparency, mobility and flexibility of learning paths to allow for more permeability and a better articulation between vocational education and training and higher education.
2. However, as the representative body of Europe's universities, EUA has some concerns in relation to the compatibility of the proposed EQF for Lifelong Learning and the Framework for Qualifications that Europe's Education Ministers adopted for the 45 countries of the European Higher Education Area at their May 2005 meeting in Bergen.
3. EUA considers the Framework for Qualifications for the EHEA as a valuable structuring element of the EHEA as:
 - it encompasses the varied and diverse landscape of HEIs in Europe and can serve as an 'umbrella' for this variety;
 - it makes use of the instruments which have already been established to reach the aims mentioned above (i.e. transparency, mobility and flexibility), such as ECTS and learning outcomes as stated in the Dublin Descriptors;
 - it builds on existing elements and patterns but also allows for new developments;
 - it provides points of reference for HEIs in situating their degrees and qualifications.
4. The adoption of the Framework for Qualifications for the EHEA thus represents progress in the concrete implementation of the EHEA and will play an important role in the next phase of the Bologna Process in informing and facilitating debates at national level, and thus in underpinning the introduction of national qualifications frameworks across Europe.
5. Both for these reasons and to avoid confusion EUA believes that it would be important to build on the work done already in reaching consensus across 45 different HE systems in constructing the broader LLL framework. In the interests of compatibility it would be particularly important to ensure:
 - a clear statement of levels and/or cycles building on the cycles described in the Framework for Qualifications for the EHEA;
 - inclusion of a credit system which fosters mobility and which – as a minimum requirement – needs to be compatible with ECTS;²

¹ Consultation on the European Commission Staff Working Document 'Towards a European Qualifications Framework for Lifelong Learning'.

² As HEIs have collected significant experience with ECTS as a credit system, EUA would give clear preference to ECTS as a common credit system. A working group of experts from the VET and HE sector should further explore this possibility.

- reference to learning outcomes which are sufficiently general to encompass the results of learning processes in institutions in an increasingly differentiated European higher education landscape;
 - that European Qualifications Frameworks remain simple and overarching in nature avoiding over-prescription that could hinder countries in the development of their own frameworks.
6. For these reasons EUA considers that it would be important in the further development of an EQF for LLL to:
- include reference to a credit system from the outset, as incorporating a credit system at a later stage could make it more difficult to ensure compatibility with ECTS, the European Credit Transfer System long championed by the Commission. ECTS has now become the reference system for European higher education, anchored in national legislation, and also piloted for use in relation to vocational training and continuing education;
 - use learning outcomes that are compatible and thus based on the same approach as adopted by the Framework for Qualifications for the EHEA, thus avoiding any potential confusion.
7. EUA hopes that these differences will be addressed. It would not be helpful to have two differently formulated and thus potentially confusing European qualifications frameworks that relate to European higher education institutions at a time when national stakeholder consultations are taking place across Europe on the development of national frameworks in the context of the Framework for Qualifications for the EHEA.
8. Furthermore, the consultation document does not specifically address questions related to
- the future status of two overarching qualification frameworks in the 25 EU countries;
 - potential duplication of work (e.g. in terms of the self-certification process);
 - how, if at all, the EQF for LLL would apply to those 20 Bologna signatory countries that are not EU members;
 - potential ambiguities related to having two sets of learning outcomes which are to some extent similar but not identical and which might lead to problems in the application at institutional level, thus hindering rather than promoting transparency, flexibility and mobility.
9. *Summary:* European universities welcome the initiative to create an overarching qualifications framework to promote transparency and trust, and reflect the diversity of LLL. Any such framework should, however, avoid confusion and overlap, in relation to the existing Framework for Qualifications for the EHEA that was formally adopted by Education Ministers in Bergen, on the basis of which ongoing efforts to develop national frameworks have been redoubled in partnership and consultation with institutions. For long term success this process requires discussion using agreed concepts and vocabulary and clarity on the purposes and status of the framework in which qualifications should be placed.

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