

EUA's response to the public consultation on the European Qualifications Framework for Lifelong Learning (EQF)

The [European University Association \(EUA\)](#) represents over 850 universities and national rectors' conferences across the European Higher Education Area (EHEA). EUA actively contributes to European higher education policy making, in the European Education Area and the European Research Area, and in the European Higher Education Area (EHEA). It is also a member of the EQF Advisory Group.

The [public consultation](#) to evaluate the European Qualifications Framework for Lifelong Learning is very timely, in view of the [European Year of Skills 2023](#) and the objectives set in the [European Strategy for Universities](#). The Covid-19 pandemic and the war in Ukraine, as well as the impacts of the latter - both in Europe and globally, have further underlined the urgency of Europe's transformation towards a sustainable economy and society, and the need to enhance education, training and lifelong learning in response to changing skills demand and demographics.

With regard to the future development of qualifications frameworks, EUA would like to highlight the following points:

1. EQF – A CRUCIAL INSTRUMENT FOR EUROPEAN EDUCATION AND TRAINING

The EQF provides a common European reference framework for defining, comparing and translating qualifications and qualification levels. The EQF has contributed to enhancing mutual understanding and transparency across European education systems, and to building trust. Its impact extends well beyond the EU and the European Education Area: the 38 countries participating in the EQF, i.e. the 27 EU member states, the countries of the European Economic Area and EU candidate countries, represent the majority of higher education systems in the EHEA. Beyond Europe, the EQF has achieved some international visibility and recognition, and provides a central entry point to the diverse European education landscape.

The EQF also serves as a European platform and instrument for exploring and coordinating change and innovation in education and training, as demonstrated in the case of the Bologna Process short-cycle programmes, and the current discussions on "international qualifications" and micro-credentials. This demonstrates the potential of the EQF, but also points to challenges, and the need to enhance its function in view of the further development of learning and training, in response to complex societal, demographic and economic changes.

What this means for the future of the EQF: It is important to ensure continuous development of the EQF with active participation of all key stakeholders including higher education institutions (HEIs).

2. MICRO-CREDENTIALS – A TEST CASE FOR INNOVATION

Over the past three years, the European higher education community has intensively discussed micro-credentials, i.e. small volumes of learning certified by a credential. Such credentials are offered by HEIs and other providers. In higher education, micro-credentials respond to a growing need for shorter, more flexible education formats. This is expected to enhance the relevance of universities for lifelong learning. More generally, it should make the educational offer more inclusive, by accommodating the needs of diverse learners and responding to rapidly changing skills needs of society and economy. According to a recent [EUA survey](#), approximately every second HEI in Europe already offers them; while in many others, they are under development. There are many questions regarding formats and delivery modes, quality assurance, stackability, how they relate to existing qualifications, and how they are awarded and recognised. Whether, by what definition, and at what level micro-credentials will be included in the EQF is therefore an important issue.

It is of crucial importance that these developments do not solely depend on providers, including universities, or left to market forces. Rather, they must be addressed through coordinated and informed discussions and work, involving relevant European and national institutions and stakeholders, on the basis of the EQF and other European policies and instruments.

What this means for the future of the EQF: The EU and member states should strengthen the ability and capacity of the EQF and National Qualifications Frameworks (NQFs) to support innovation in education and education provision, such as micro-credentials, in response to societal, demographic and economic transformations.

3. RETAINING LINKS AND ALIGNMENT WITH THE EHEA

The development of two parallel European qualifications frameworks (QFs) initially created confusion and misunderstanding. However, the EQF and the Qualifications Framework for the EHEA (QF-EHEA), have become better aligned over the years. It will be important to retain the interrelation between the two frameworks, also for non-degree and shorter learning formats, such as micro-credentials.

What this means for the future of the EQF: A continued and enhanced alignment of the EQF with the QF-EHEA must be among the goals and conditions of the EQF's future development. This will ensure fruitful synergies between the EEA, the ERA and the EHEA, and enhance ownership and participation of a wide range of stakeholders.

4. CONSISTENT USE OF THE EQF AT EUROPEAN AND NATIONAL LEVELS

The EQF is a meta-framework: it has been the catalyst for the development of comprehensive NQFs based on learning outcomes, and enables a comprehensive overview of qualifications in 38 European countries. This must be considered when exploring the impact of the EQF, for example in supporting cross-border mobility and ensuring more flexible learning paths for learners, including lifelong learners.

In daily practice, most users, such as individual learners and teachers, employees and employers will refer – if at all - to their respective NQF, which is referenced to the EQF. But the current and future European labour market is both extensive and legally integrated, and there are major transnational opportunities in education and training. Therefore, it would be important that the EU consistently references the EQF within its own legislation, and encourages member states to do the same. Some progress has been made, for instance in [Directive \(EU\) 2021/1883](#) on the conditions of entry and residence of third-country nationals (the Blue Card Directive), and Article 49 of [Directive 2013/55/EU](#) amending Directive 36/2005/EC on the recognition of professional qualifications (new Common Training Frameworks): both refer to the EQF. That said, there are still major areas in EU legislation which ignore the EQF. For example, the general system for recognition of professional qualifications still measures gaps between the level of qualification attained and the level required on a five-level grid. The eight EQF levels would be more appropriate for use, and a powerful tool for labour market integration. Regarding the seven sectoral professions (doctors, dentists, etc.), it would be helpful if Directive 2005/36/EC were to mention the EQF every time that it allows ECTS to be used to characterise qualifications. This should be considered by the Directorate General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) for further revision.

Although the EU has no competence in the area of continuing professional development (CPD), it could well encourage member states, regulatory, professional and academic bodies to reference CPD activities to the EQF, whenever relevant. This also concerns a more systematic and connected approach towards existing European instruments. Even education professionals find it difficult to make the links between EQF, Europass, Individual Learning Accounts, and the European approach to micro-credentials, to name but a few examples.

What this means for the future of the EQF: The EQF should be given due importance and visibility in EU legislation and the *acquis communautaire*, as well as in instruments and activities developed by the EU and its member states.

5. ENHANCED VISIBILITY AND USE OF THE EQF

While the EQF and NQFs are acclaimed instruments at policy and system level, the EQF also has the capacity to enable mobility and lifelong learning, within and between various educational fields and sectors, and for individual learners across European countries. But this is more difficult to assess and demonstrate, and many European citizens, including university staff and students, may not know about the EQF and NQFs, and may never have used them directly. Qualifications frameworks may still appear to be too complex and technical for end-users.

In this regard, the European Commission's website providing information about the EQF and its implementation in different countries is a welcome improvement. However, presenting the EQF as a "Europass tool", next to CV templates and similar, to a certain extent downgrades and trivialises it. Some national authorities and education and training providers work towards making information about the EQF clearer and more directly accessible to learners. These efforts should be enhanced, encouraged and supported.

While the EQF is acknowledged by parts of the sector as a key tool for [fair and transparent recognition processes in line with the Lisbon Recognition Convention](#) and a [core constituent of](#)

[automatic recognition](#), this role could be made more visible, acknowledged and used, in order to enhance recognition practices in Europe. Despite improvements and significant efforts, students and graduates, but also HEIs, still experience problems and uncertainties with recognition processes, and in particular with automatic recognition. This is testified by the ongoing discussions on joint degrees under the European university alliances. The EQF could also be emphasised as an important instrument for Recognition of Prior Learning (RPL), which in higher education is still not applied in about one third of the EHEA countries.

Overall, the EQF could help to promote flexibility and inclusiveness, to accommodate diverse student needs, in due respect of the NQFs.

What this means for the future of the EQF: The evaluation should explore and assess the added value of EQF and NQFs for its users, with regard to making qualifications more readable and recognisable, supporting the mobility and employability of graduates, as well as change in education, and suggest how this can be enhanced.

EUA strongly supports collaboration between the EU, national government agencies and all stakeholders, including education providers, to evaluate the implementation of the EQF and develop the next steps for the further implementation of the framework. This endeavour should maintain a strong focus on flexible learning, lifelong learning and European and intersectoral mobility. In the event of a review and revision of the [2017 Council Recommendation](#), EUA recommends including specific objectives which will allow clearer assessment of EQF implementation. This would enhance transparency, as well as the interest of the sector in these efforts.