

# The European Qualifications Framework: a technical critique

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## Abstract

The European Qualifications Framework (EQF) was introduced in 2008 as a 'meta-framework' or common reference point for national qualifications frameworks in Europe, a function for which, with some caveats, it has been pragmatically successful. It has also been used with variable success to support the development or referencing of sectoral qualifications frameworks, although questions remain about how these interlink with national frameworks. Use of the EQF as a tool for allocating levels to individual qualifications or to aid qualification development has been conspicuously less successful, due both to these applications requiring more detail than is present in the EQF and in some cases to developers' lack of fluency in working with qualification frameworks in general. Testing the EQF via a range of international projects also points to some flaws in the detail of the framework itself, particularly in the way that it represents competence and to a lesser extent knowledge.

## Introduction

The European Qualifications Framework (EQF) was formally adopted in 2008 as part of the European Union's strategy for promoting lifelong learning and mutual recognition of qualifications (European Communities 2008). The framework was designed as what has been called a 'meta-framework' (Tuck 2007, Raffe *et al* 2007), in this case an overarching framework that provides a common reference point for the national qualifications frameworks (NQFs) of member states, and provides a crude means of comparing the levels of different qualifications between them. The EQF is part of a set of structures that seek to improve the recognition of learning and achievement between European Union countries, other components of which include the European Credit System for Vocational Education and Training (ECVET, see CEDEFOP 2012) and the European Quality Assurance Reference Framework for Vocational Education and Training (EQARF, see Galvão 2009). The EQF is also broadly compatible with the framework of the European Higher Education Area (the 'Bologna framework', Bologna Working Group 2005), while being wider in scope (effectively meaning that a qualification that can be referenced to the Bologna framework can in principle be identified against an EQF level, although the reverse does not necessarily apply).

The EQF is designed to support the recognition of a wide range of achievements regardless of when or where they take place. It does not make any stipulations about the size of qualifications, the type of organisation that awards them, whether they are the result of a formal learning programme or are gained through other means, or how or where they are assessed. The EQF describes its eight qualification levels in terms of the outcomes of learning rather than as stages of progression, so that for instance there is no assumption that one level of qualification will be achieved before another, or

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that any particular mode of learning is needed to achieve a qualification at any given level. The *modus operandi* of national qualification systems that are referenced to the EQF are left open beyond a requirement for basic quality assurance processes, so that not all of these principles will necessarily apply in every country that subscribes to the EQF.

Since its introduction the EQF has been used by European countries and cross-national initiatives for a variety of purposes. The official use of the framework is as a referencing-point for national qualifications frameworks, a process that began in 2008 and is ongoing. Some countries have also used it as a guide for developing or revising their own frameworks, a purpose which was inevitable given that few European countries already had a qualifications framework of their own, at least in a form that could be mapped to the EQF. Finally the framework has been used by occupational sectors and development projects for various purposes including referencing or developing sectoral frameworks, assigning a nominal level to qualifications, and guiding the development of new qualifications. These latter uses go beyond the purpose for which the EQF was created, and can involve using it at a level of detail for which it was not designed; as will be seen in the discussion that follows, their success has been variable.

### **The EQF in relation to national frameworks**

A major aim in creating the EQF was to support transparency between different qualifications and qualification systems across Europe. In order for this to happen to any realistic extent, a multi-stage process needed to take place in and beyond each country comprising (for most countries) creating an NQF, mapping it to the EQF, and testing the mapping through dialogue and practical comparisons to see how qualifications compare internationally, both directly and via their assigned EQF levels (see Luomi-Messerer 2011). A sub-text of this aim, in accordance with the EQF's design principles stated above, was to encourage the development of achievement-based frameworks that avoided making assumptions about the positioning of qualifications based on the part of the system they were located in, the institutions responsible for them, or the sequence in which they were taken (Bjørnåvold 2007).

By the end of 2012 a total of 36 countries had linked, or intended to link, their qualifications systems to the EQF (Bjørnåvold and Pevec Grm 2013). A total of 40 national frameworks had been completed or were under development, with 24 of these formally adopted in the country concerned and 18 officially referenced to the EQF; several further frameworks were expected to be referenced during 2013. All of these frameworks were achievement-based, and the majority comprised (like the EQF) eight levels; a few consisted of as few as five or as many as 13 levels. At least superficially this development and referencing process appears to be successful, and early indications are that it is provoking a certain amount of rethinking about the specification and positioning of qualifications within national systems, for instance promoting approaches based on the outcomes of learning as well as challenging perceptions of certain types of qualification as automatically low-level and low status (*ibid*, Broek *et al* 2012). Nevertheless there are at least two significant caveats relating to this process.

First, some inconsistencies are appearing in the way that broadly comparable qualifications map to EQF levels via their respective national systems. This has been apparent in a number of areas, including in relation to general education certificates which lend themselves to fairly easy comparison. One example concerns the junior secondary certificate in the Nordic countries, which is regarded as nominally equivalent but provisionally maps to EQF level 2 or 3 depending on the country carrying out

the referencing. A second concerns the positioning of the senior secondary certificate (i.e. the award that typically gives access to higher education), which in most cases appears at level 4. In Scotland, the Advanced Higher award is positioned at level 5 while its closest English equivalent is at level 4; while there is some evidence that the Advanced Higher is a marginally more demanding qualification (Johnson and Hayward 2008), this is probably not enough to justify its appearance at the same level as short-cycle higher education qualifications. The senior secondary certificate in the Netherlands was also initially positioned at level 5 although it has since been adjusted downwards. While vocational qualifications are typically less straightforward to compare, some that are accepted by occupational sectors, professional institutes or national recognition centres as equivalent are also appearing at different EQF levels depending on the referencing of their respective national frameworks (e.g. EU in Motion Partnership 2010). This is however not necessarily a problem at the current early stage of development, as it is leading to dialogue about the interpretation of the EQF levels and how they apply to national frameworks; as referencing is revisited it opens the possibility for mapping between NQF and EQF to be revised, as well as in some instances qualifications to be repositioned within their respective NQFs.

Secondly, some scepticism is in order in relation to both the speed of development of some NQFs, and their close adherence to the levels and in some cases language of the EQF. Qualifications frameworks are complex, challenging to implement, and need not only to be technically sound but cognisant of different traditions and political and operational realities (cf. Tuck 2007). The ability of frameworks to act as vehicles of reform is also generally more limited than their originators envisage (Allais 2011, Raffe 2013), so that frameworks that are not supported by other aspects of the education and training system tend to fail or need to be heavily revised; this lesson is apparent from some of the early developers of NQFs including England (Lester 2011), New Zealand (Strathdee 2009) and South Africa (Allais 2007). A concern in this regard must be that some of the recently-developed frameworks need to go through further iterations before they are fully fit for purpose, or as Bjørnåvold and Pevac Grm (2013) comment they may be quietly sidelined after referencing has taken place. Alternatively, the poorly considered adoption of principles apparently derived from the EQF can run the risk of undermining the quality and credibility of existing systems (Young 2008, Deißinger 2012).

### **The anatomy of qualifications frameworks**

Before continuing to discussion of the EQF in relation to sectoral applications and qualification design, a short digression into the structure and specification of qualifications frameworks is relevant. The majority of contemporary frameworks can be described as levels-based rather than sequence-based, in that they consist of a series of levels rather than a sequence of qualifications, and as with the EQF there is no assumption that qualifications at different levels will be achieved in strict sequence (even if this is normal in the qualification *system* to which the framework relates). In a few frameworks (notably the Australian one [Australian Qualifications Framework Council 2013] and the UK higher education framework [Quality Assurance Agency 2008]) the descriptions of the levels are essentially the descriptions of the major qualification-type at each level, but more usually levels are described independently of any particular type of qualification.

The usual method of defining framework levels is through a statement or *descriptor* which states, in very broad terms, the kinds of abilities that the level represents. Occasionally this is in the form of a single paragraph; more commonly it consists of a series of short points or level *indicators*, sometimes

grouped into domains such as knowledge, skills and autonomy as illustrated in table 1. Generally the indicators are linked across levels by taking the same concept (for instance complexity or autonomy) and expressing it as it applies to each level: so for instance at level 1 an indicator in the domain ‘scope’ might be ‘accepting boundaries of work as given, querying if unsure’, while at level 5 it becomes ‘understanding the implications of different issues and courses of action’ (Ufi-Learndirect 2001). Level statements for generic qualifications frameworks are however difficult to write, because they need to convey the nature of the level, apply to a very wide range of contexts without becoming restrictive, and strike a balance between being sufficiently concrete to be easily understood and sufficiently abstract to be reasonably universal. Unfortunately (and understandably) there are perhaps few frameworks where this is done particularly well; although it tends to err on the side of abstraction, one of the better examples is the now largely redundant Ufi-Learndirect *Learning through Work* framework (*ibid*), where particular attention was given to following concepts across levels and ensuring that all indicators apply to at least the majority of potential contexts they will be used in.

**Table 1. Descriptors for EQF level 5 from the EQF and from a national framework**

(a) European Qualifications Framework		
Knowledge	Skills	Competence
Comprehensive, specialised, factual and theoretical knowledge within a field of work or study and an awareness of the boundaries of that knowledge	A comprehensive range of cognitive and practical skills required to develop creative solutions to abstract problems	Exercise management and supervision in contexts of work and study where there is unpredictable change  Review and develop performance of self and others
(b) Qualifications and Credit Framework (United Kingdom)		
Knowledge and understanding	Application and action	Autonomy and accountability
Use practical, theoretical or technological understanding to find ways forward in broadly-defined, complex contexts  Analyse, interpret and evaluate relevant information, concepts and ideas  Be aware of the nature and scope of the area of study or work  Understand different perspectives, approaches or schools of thought and the reasoning behind them	Address broadly-defined, complex problems  Determine, adapt and use appropriate methods and skills  Use relevant research or development to inform actions  Evaluate actions, methods and results	Take responsibility for planning and developing courses of action, including where relevant responsibility for the work of others  Exercise autonomy and judgement within broad parameters

In general, level descriptors are only properly workable if the individual indicators within them are used as their name suggests – i.e. indicative of the level rather than attempting to define it. Essentially they need to be interpreted as focal examples of the kinds of things that are appropriate to working at the relevant level, rather than things that must be present in every qualification within it. This is particularly so where indicators are written in the form of concrete activities. A good example is provided by the EQF, where one of the four indicators at level 6 is “take responsibility for managing professional development of individuals and groups” (EC 2008, p13); while this may be relevant to level 6, it is a very specific occupational activity that will not feature in more than a small proportion of level 6 qualifications. As is made explicit in the preamble to some frameworks (e.g. SCQF Partnership 2009), level indicators add up to what is essentially a best-fit device that enables qualifications to be positioned at the most appropriate level, and helps qualifications developers write specifications that correspond to the chosen level.

As a further point, it is worth noting that level indicators are not themselves learning outcomes or competence statements in the sense of needing to apply to individual learners achieving a qualification at the relevant level. Some frameworks do exist that are designed to position individual learning in terms of level – the Ufi-LearnDirect framework is an example, and others are used by universities for individually-negotiated programmes – but level indicators in national frameworks are broad criteria that can be used to make judgements about where qualifications and sometimes qualification units or modules sit in relation to framework levels.

It is also worth noting that as Table 1 suggests, the EQF level descriptors are much briefer than those of most national frameworks and contain fewer level indicators. A crude measure of this can be provided by comparing the amount of text devoted to specifying the levels of the EQF (572 words, in English) with those of national frameworks: for instance 1798 words for the English Qualifications and Credit Framework (Ofqual 2008), 1868 for the Irish framework (National Qualifications Authority of Ireland 2003), 3216 in Malta (Malta Qualifications Council 2007), 3272 in the revised Scottish framework (SCQF Partnership 2012), and 3885 in the Netherlands (Van der Sanden *et al* 2012). This is not mentioned as a criticism of either the EQF or the national frameworks, but to suggest that the different purposes of the frameworks are reflected in different levels of detail.

### **The EQF and sectoral applications**

Occupational sectors that have chosen to engage with the EQF directly have generally done this in either or both of two ways: through international sectoral qualifications or levels frameworks, and by attempting to map qualifications directly to the EQF. There are obvious benefits to both approaches in terms of international comparability and workforce mobility, the first connected with straightforward read-across between qualifications as well as their potential convergence, and the second (particularly for qualifications used in more than one country) in attempting to secure a common understanding of level and ideally leading to comparable positioning within national frameworks. While these applications are outside the formal remit of the EQF, semi-official support has been given to exploring both through a number of development projects funded by the European Union (see Zahilas 2011 for a summary and discussion).

The relationship between sectoral frameworks and the EQF is in some respects analogous to that between the latter and national qualifications frameworks, with some frameworks being effectively sectoral interpretations of the EQF, while others have been developed independently of it and then mapped to it. The projects EQF-Sports (EOSE 2008), for sport and fitness professionals, and SQF-Con (BAQ 2009), for the construction industry, illustrate technically successful frameworks that are based on use the structure of the EQF while substituting the latter's level descriptors with detailed statements that apply more specifically to the sector. The European e-Competence Framework for information and communications technology (e-CF Partnership 2010, EQF-Code 2010) was on the other hand developed independently to meet industry needs and expectations, and differs from the EQF in its approach to levels and descriptors; it was then cross-referenced in a similar process to that used to reference national frameworks. In principle these frameworks can provide a usable way of comparing sectoral qualifications at a European level, but there are potential issues in how qualifications map into the EQF via sectoral and national routes (e.g. EU in Motion Partnership 2010, Zahilas 2011). Khayat *et al* (2009) comment that sectoral agreements can lead to a higher level of trust on comparability than the more remote arrangements through national frameworks, though it is

the latter that provide the official referencing. They also remark that while sectoral frameworks are influenced by occupational needs, NQFs tend to be driven by national education and training systems, potentially increasing the scope for discrepancy. As suggested above in the discussion of national frameworks, this is not necessarily a problem if it leads to constructive dialogue.

Attempting to use the EQF to allocate levels to qualifications has proved to be more problematic, with a general picture of projects struggling to produce results that can be regarded as acceptably robust. A common observation has been that the EQF descriptors are insufficiently detailed enough or widely applicable to support consistency, with sector experts applying different interpretations to the level indicators to reach sometimes widely disparate conclusions (e.g. EU in Motion Partnership 2010, Equalifise 2010). Because not all the EQF domains are relevant to all qualifications – several projects criticise the competence domain as particularly problematic, and there is also evidence of difficulties in applying the knowledge domain to some practical qualifications – decisions sometimes depend on a single indicator (e.g. Equalifise 2010, e-CF Partnership 2010). An illustration of the kinds of problems encountered can be provided from the project TRAVORS2 (Lester 2013), where a unitised, competence-based certificate in vocational rehabilitation was developed and mapped to the EQF. The qualification units were written to relate to what might be termed a paraprofessional role, expected to equate roughly to EQF level 5 (see table 2).

**Table 2.** *Mapping the TRAVORS2 qualification to the EQF*

EQF domain	Level	Comments
Knowledge	--	The fairly deep level of practical and contextual knowledge implied in the qualification was difficult to relate to the 'factual and theoretical knowledge' described in the EQF level indicators.
Skills	5-6	The qualification could be interpreted as matching the EQF indicators at any level between 3 and 6. On balance most units appeared to show a best fit with levels 5 and 6.
Competence	5-6	Most of the EQF indicators were too specific to apply as they refer to management and supervision, which is not a necessary function of the role for which the qualification was designed. Interpreting the indicators very broadly, a best fit could be argued for level 5 or 6.

On balance any claim to level 5 that might be made on behalf of the TRAVORS2 certificate could be argued to be based as much on its initially-positing level than on the results summarised in the table. To provide a greater level of confidence, the qualification was also mapped to the UK QCF and the Scottish Credit and Qualifications Framework (both already referenced to the EQF), ultimately supporting its positioning at level 5. The need for a more detailed framework – national or sectoral – for allocating levels to individual qualifications is noted in several other sectoral projects, including in the electrical industry (Dart 2007), hairdressing (EQF-Hair Partnership 2009) and financial services (Equalifise 2010).

### **Using the EQF as a template for qualifications**

Some national and transnational projects have gone a step further in using the EQF as a template to aid the design and development either of qualifications directly, or of the content frameworks on which qualifications are based. The basic method of doing this has been to structure the qualification according to the three EQF domains (knowledge, skills and competence), writing the content of each domain as learning outcomes that match to the relevant EQF level. Evidence from projects that the

author has been involved in or evaluated suggests that while it can be recognised in principle that it is more effective (at least for vocational qualifications) to start with workplace demands and therefore competence, working back to the skills and knowledge needed to act competently, it is more common to identify knowledge and skills first and address the competence section last. 'EQF-format' specifications of this type have been produced by a number of transnational projects, including GemTrEx (professionalising gender trainers and experts in adult education), Scambor *et al* (2008); MOTO (Model of transferrability of learning outcome units, several sectors), Alluli *et al* (2011); ISOQUAM (metals industry), ISOQUAM Partnership (2011); EuSafe (European qualification for occupational safety of innovation), EuSafe Partnership (2012); European Workplace Tutor (EWT), EWT Partnership (2012); and Certi.MenTu (Certification for Mentors and Tutors), Certi.MenTu Partnership (2012). The outputs of these projects vary in quality, and suggest the following:

- Following the EQF knowledge indicators too closely can result in the qualification emphasising formal or propositional knowledge (i.e. 'knowing that') rather than 'knowing how' or knowledge-in-use, which may or may not be appropriate; arguably in three of the projects (Certi.MenTu, EWT and to an extent ISOQUAM) it led to more propositional knowledge being included than was actually needed. An issue here appears to be that by giving each of the three domains equal emphasis, practical qualifications become encumbered by the inclusion of more formal knowledge than is relevant. A reciprocal argument will potentially apply in relation to academically-oriented qualifications and skills or competence.
- Developers can have difficulty in distinguishing between skills and competence. Various approaches were witnessed including putting know-how in either or both domains (ISOQUAM, EWT), listing work tasks under skills or skills under competence (most of the projects), and (following the way some of the EQF indicators are written) describing competence as things that the qualification candidate is expected to supervise or manage rather than do personally (to some extent Certi.MenTu). The common English-language notion of competence as using knowledge and skills effectively in order to do something (cf Eraut 1998, Lester 2014) was not particularly well reflected across all projects.
- Following on from the above, the idea of competence appears commonly misunderstood and poorly expressed. In ISOQUAM and Certi.MenTu (particularly in early drafts) it partly reflected responsibilities, again reflecting the EQF indicators. This suggests first a failure to appreciate the difference between level indicators and learning outcomes, and secondly confusion between being competent at something (which is assessable and can provide grounds for certification) with being responsible for it (which is not).
- Finally, there was evidence in EWT and Certi.MenTu and to a smaller extent MOTO of attempting to follow the wording of some of the EQF level indicators too closely, leading in places to somewhat inappropriate statements; as an example, workplace mentors were expected to "have comprehensive knowledge of specific theories, models and methods of communication" (Certi.MenTu Partnership 2012, p3), something that could imply knowledge at a substantially higher or broader level than was actually envisaged. Again this suggests that the level indicators in the EQF are being interpreted as if they were generic learning outcomes.

A further issue is that while writing an academic qualification to fit to a specific level is widely accepted practice, attempting to do this with an occupational or professional qualification may mean that essential content is left out or is included at a greater or lesser level of complexity than needed for practising the occupation. While it was unclear whether or not this applied in any of the examples examined, the development process in TRAVORS2 indicated that attempting to make the units fit better with the intended level would have led to this type of distortion. In established national frameworks it is usual to expect that some kinds of qualification will have an uneven profile in terms of level, demonstrating an averaged rather than perfect fit against the framework level (e.g. SCQF Partnership 2009, Timonen 2010).

The above observations indicate that while it is possible to structure individual qualification content in the same format as the EQF, firstly this demands a reasonably sophisticated understanding on the part of the developer of the difference between know-how, skills, tasks and areas of competence, and secondly it works most effectively when the temptation to mirror EQF content too closely is avoided. Of the examples above, only in GemTrEx, EuSafe and to some extent MOTO was this done reasonably well; in the others a sense was present of attempting to write the qualification to the EQF, generally with confusion between tasks, skills and competence.

### **Issues and limitations in the EQF specification**

The above analyses of four uses of the EQF suggest that while the framework is potentially suitable for its original purpose of acting as a meta-framework or reference point for national qualifications frameworks, its ability to support other applications – particularly those concerned with individual qualifications – is limited, and using it in this way may actually undermine the quality and fitness for purpose of qualifications. To a large extent this appears to be an issue of misapplication and misinterpretation rather than a problem with the EQF itself, although there are some contributory factors in the conceptualisation behind the EQF and the way it is specified.

Of the two main issues in the way EQF levels are described, the less obvious concerns knowledge. The progression from “basic general knowledge” at level 1 through to “knowledge at the most advanced frontier of a field of work or study...” at level 8 (EC 2008) is a fairly widely-used, and potentially academically robust, way of describing levels in terms of knowledge. It does however suggest that different types of knowledge are appropriate to different levels; the EQF progresses through general, factual, theoretical and critical, though breaking this progression at level 8. This becomes problematic mainly if the knowledge domain is applied to contexts where knowledge is implied or tacit, or is principally transdisciplinary or dispositional in nature; the fact that knowledge is not made explicit or is not defined by a ‘field of work or study’ (a term that appears at all EQF levels except level 1) does not mean it is not present, or is not of a high level (see for instance Scott *et al* 2004 for a discussion of types of knowledge at doctoral level). While the most obvious impact of this is in relation to applications in relation to individual qualifications (as in the TRAVORS2 and Certi.MenTu examples given above), there is also a concern in terms of how the EQF is influencing the description of the knowledge domain in national and sectoral frameworks, with the potential to impose an epistemological position that downplays the importance of tacit and less formalised kinds of knowledge. It is noteworthy that the UK Qualifications and Credit Framework, as well as the *Learning through Work* framework previously referred to, avoid categorising knowledge precisely because of this issue.

A more urgent concern with the EQF relates to the competence domain. Competence is described in the EQF document as “the proven ability to use knowledge, skills and personal, social and/or methodological abilities in work and study situations and in professional and personal development” (EC 2008, p11). While this is a fair definition it is slightly unusual in lacking any reference to the result of using the knowledge, skills and abilities; the International Standards Organisation definition for instance is “ability to apply knowledge and skills *to achieve intended results*” (ISO 2012, p2, my emphasis), and it is clearly possible to have knowledge and skills but use them in a way that is not competent. However (and somewhat curiously) the EQF statement above then goes on to describe competence “in terms of responsibility and autonomy” (EC 2008, p11), something that rather than relating to either of the above definitions reflects a different and more legalistic use of the term, as in the idea of a ‘competent authority’ where competence refers to remit rather than ability. Markowitsch and Luomi-Messerer (2007) suggest this reflects a desire to incorporate both ideas of competence, but significantly the commonest English-language use of the term – in the sense of having the ability to meet an expectation in a work, academic or social context – is missing from their discussion. This externally-referenced idea of competence, as distinct from internal competence or ‘competency’ in the sense of the possession of skills and attributes (see Mansfield 1989, Eraut 1998, Mulder *et al* 2006 and Lester 2014 for further discussion), appears to be what the EQF attempts to capture but fails to articulate. This peculiarity is remarked on in several projects that have engaged with the EQF from an industry or professional perspective, most notably by the e-CF Partnership (2010) and Equalifise (2010).

In practice (and as stated in the EQF document itself and elaborated on by Markowitsch and Luomi-Messerer 2007) the EQF avoids attempting to be a competence framework of any kind and does not contain indicators that relate directly to competence. Instead the domain titled ‘competence’ covers similar ground to the ‘autonomy and accountability’ domain in the UK Qualifications and Credit Framework (Ofqual 2008). Both these domains are concerned with the conditions under which competence is exercised, i.e. the level of supervision, autonomy and responsibility under which the qualification candidate might be expected to demonstrate the kinds of ability referred to in the other sections of the descriptor. However, the indicators used in the EQF range from the broad and generally usable, for instance “work or study under direct supervision in a structured context” (EC 2008, p12) at level 1, to highly specific statements such as the previously-noted one about managing the professional development of individuals and groups (which would be out of place even in a national framework, unless perhaps as one of several indicators included as exemplar activities). Unfortunately this somewhat muddled conception of competence is being picked up uncritically in some of the frameworks that are influenced by the EQF, as well as in development guidance that feeds into the design of individual qualifications (e.g. Grün *et al* 2009).

## **Conclusions**

Within the seven years since its launch the EQF is proving highly influential not only in its official function as a translation device between national frameworks (and as part of a drive towards qualifications based on explicit achievements), but as a reference-point for a range of other applications including encouraging international compatibility between sectoral qualifications and acting as a benchmark for the development of individual awards. The fitness for purpose of the EQF purely as a referencing device is, with some minor caveats, fairly widely accepted (Luomi-Messerer

2011), but for other purposes its suitability is more questionable; broadly speaking, it has a certain amount of adequacy for tasks such as aiding the development of national and sectoral frameworks if this is done intelligently, but rather less for positioning or supporting the design of individual qualifications.

This raises two main issues. The first is the extent to which enthusiasm for, and assumptions about compliance with, the EQF need to be managed so that the framework is used both intelligently and in ways that maintain its adequacy. It is probably too late to discourage what could be construed as misuses, such as using the framework to reference or structure individual qualifications, although as national and sectoral frameworks emerge developers may find these to be more appropriate tools for their purposes. However, there is time to provide guidance for some of these uses that encourages a more intelligent and critical approach to using the framework, creates an appreciation of the gap between the highly generic nature of the EQF and the specific nature of sectoral applications, and discourages rigid copying of the EQF structure and language into more specific contexts. The second issue is the way the EQF levels are described. Without suggesting that the level descriptors should be changed to accommodate any potential use to which the framework can be put, it is perhaps time to subject them to review. Incremental changes that might be considered include revisiting the way that knowledge is described, so that type of knowledge is not used as a proxy for level of knowledge; improving the way that competence is conceptualised (while perhaps removing the misleading 'competence' title from the final column of the level descriptors); and ensuring that the level indicators, particularly those relating to this latter area, are actually indicative of the level rather than reflecting specific occupational activities that might possibly fall within it.

To conclude, the EQF has been taken up with a significant amount of enthusiasm both for its intended applications and for a variety of additional uses. This wide-ranging adoption can be regarded as welcome, as it creates a common point of reference for dialogue about qualification levels and comparability; but it also brings with it issues about the limitations, both in terms of application and design, of the EQF. In places the EQF has been used both unintelligently and regardless of whether it is the best tool for the job, admittedly in some instances in the absence of anything better (such as an established national framework or good-quality guidance on designing outcome-based qualifications). A challenge that now needs to be addressed is how to maintain the framework's positive influence while limiting the misapplication and over-rigid (or simply wrong) interpretation that is leading to less desirable side-effects. It is admittedly not easy to do this in an environment where there is a strong policy objective to promote the use of the EQF and encourage the development of 'outcome-based' qualifications (e.g. Broek *et al* 2012), particularly where this combines with varied interpretations and levels of expertise in different countries, sectors and projects. However, some starting-points might include greater examination of, and open and critical dialogue around, the practical results of 'EQF-focused' sectoral and project developments; the creation of relevant guidance that is based on this kind of practical evidence and critical review; and, as indicated above, revisiting the way that the EQF levels are described.

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