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New EU Instruments for Education: Vertical, Horizontal and Internal Tensions in the European Qualifications Framework

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### **Abstract**

Traditionally constrained by the Treaty to subsidiary action, a number of innovative approaches for joint European coordination in the area of education have emerged in recent years. This article analyses a particular new European Union (EU) instrument for education – the European Qualifications Framework (EQF) – by examining the vertical, horizontal, and internal tensions within the instrument. Analysis of the vertical dimension identifies widening EU capacity for joint coordination through an informal widening of the subsidiarity principle and opportunities for diffusing EU preferences. Analysis of the horizontal coordination processes suggest that there is still some fragmentation in terms of coordinating the EQF across relevant sectors, even if emerging coordination can be identified in some areas. The internal tensions are related to the nature of the instrument that covers all levels and types of education. It is argued that these internal tensions remain, but the EQF has facilitated the development of a new arena for discussing policy coordination (EQFAG) that can, in the long run, reduce these tensions. While the impact of the EQF has been uneven and its implementation proceeded with various speed at this point, it nevertheless is a successful case of a particular Commission policy preference that has been gaining widespread acceptance across Europe in an area where coordination previously had been met with resistance.

## Keywords

Education; Qualification frameworks; Coordination

As the European Union (EU) increasingly encompasses a heterogeneous set of member states, both politicians and researchers agree that there is a need to view the integration processes according to a differentiated framework (Holzinger and Schimmelfennig 2012). Indeed, it can be seen that the level and scope of integration varies from sector to sector – for instance, monetary policy with the single currency has been highly integrated, whereas common security policy is coordinated through intergovernmental negotiations (Börzel 2005). With the exception of vocational training, education (including higher education) has traditionally been an area where political will for more European integration has been scarce. Integration efforts in higher education have a long history dating back to early days of the EU, but have over time achieved piecemeal and incremental integration (Corbett 2005). Despite more policy outputs in the area of education (Pollack 1994), there has not been widening supranational legal capacity for action and joint action is undertaken primarily under the subsidiarity principle. Progress is characterized by frequent contestations on the vertical (national-European) and horizontal (coordination between sectors) integration process (Chou and Gornitzka 2014). After the introduction of the Lisbon agenda in 2000, debates about education took place in a context of increased political will, consequently creating new institutional spaces for action (Gornitzka 2007). However, the emerging picture is not one of increased supranationalism and transference of legal competencies to European level; instead, one can see a complex multi-arena, multi-actor and multi-level system in the making where there is still considerable experimentation on the appropriate kind, scope and depth of coordination.

One example of an instrument that represents an attempt for more joint coordination is the European Qualifications Framework (EQF), a policy instrument with its stated aim to create more transparency of educational qualifications across Europe. The EQF was introduced in 2008 through a joint

Parliament and Council Recommendation. Following this, there have been widespread national processes of establishing national qualifications frameworks (NQFs). The EQF encompasses all educational levels (from primary education to advanced degrees in higher education), as well as learning that takes place outside formal educational institutions (informal and non-formal learning). As the EQF is framed as an instrument for lifelong learning policy, it has relevance for both the educational and the employment sector. Consequently, it is also seen as an instrument for greater worker mobility, not necessarily only student mobility.

One can expect that policy instruments in the EU are geared towards more coordination in Europe. Hence, in order to understand the potential contribution of policy instruments for more coordination, it is essential to examine some of the existing tensions within the instruments. This article addresses the following research questions: What kind of coordination tensions can one identify in relation to the EQF as an instrument? What are the consequences of such tensions for the EQF as an instrument for increased European coordination in the area of education?

This article examines the EQF at three tension points, related to the nature of EU integration and policy processes, the nature of education as a policy sector and the nature of this specific policy instrument. These tensions are consequently related to vertical and horizontal coordination, as well as to the internal tensions within the instrument. It analyses documents (including formal EU documents in the process of adopting the EQF, commissioned reports, as well as policy documents) as well as the data gathered from 23 semi-structured in-depth interviews carried out in spring 2013 with actors who are working or have worked with the development of the EQF. The interviewees include EU officials, holding senior or junior positions in the Commissioner's office, the Commission as well as the European Centre for the Development of Vocational Training (CEDEFOP), members of the EQF Advisory Group (both national representatives and stakeholder representatives), as well as various consulted experts who have been involved in the development of the EQF. The article first outlines the analytical framework with specific focus on vertical, horizontal and internal tensions. After this, the empirical case is presented and analysed according to these three tensions, and the study concludes with further reflections on the implications of the analysis and provides further avenues for research.

#### ANALYTICAL FRAMEWORK - VERTICAL, HORIZONTAL AND INTERNAL COORDINATION

Since the 1990s, the EU has had two major goals: (1) deepen and widen the scope of integration and (2) strengthen the role of the EU from an economic and political perspective (Andersen and Eliassen 2001). However, integration has been taking place along various speeds and with varying levels of success across policy areas. This has to do, on the one hand, with the varying legal competence built into the Treaties, and, on the other hand, with varying legitimacy to engage in supranational activities (Olsen 2002). Thus, it has been suggested that one should focus on the specific empirical domain for action (Tallberg 2010) in order to study the specific configurations.

When discussing vertical coordination, the introduction of the Open Method of Coordination (OMC) challenges the traditional vertical zero-sum game where more European competence is perceived to lead to growing constraints on the domestic level (Börzel 2005). Furthermore, OMC marks a shift towards what has been called both "new" (Heritier 2001) and "experimentalist" (Sabel and Zeitlin 2008) governance arrangements. The use of OMC is especially widespread in areas considered 'half way communitarized', i.e. education, research, welfare and immigration (Kaiser and Prange 2003). In this way, OMC has also enabled the EU to create space for policymaking that has previously been met with resistance (Gornitzka 2007). It has not brought any formal widening of competencies in the Treaty, but it can be seen as a partial transfer of powers in terms of coordination and communication, but not legal and executive powers (Borrás 2008). While its intergovernmental nature is often

stressed, OMC has created arenas for increased EU involvement. By introducing a new voluntary, subsidiary and inclusive mode of governance (Heritier 2001), the Commission can facilitate a level of agreement on problems and solutions and further its preferences on certain issues. The OMC also has implications for horizontal coordination, as it facilitates systematic linkages between policy areas (Borrás and Jacobsson 2004). Certain EU level instruments can affect policy areas where the EU has varying legal competence. This is of relevance, as this would imply varied existing structures, pathways and institutional legacies, which in turn would create a need for horizontal coordination.

While the EU can only be seen as a state-like structure to a limited extent, it mirrors the fragmented policymaking structures of the nation states to a large extent, and the varying speed of integration further fuels the differentiation between policy sectors. Different Commission Directorates-General (DGs) are responsible for a variety of policy sectors. This means that, while the Commission is often conceptualized as a single actor, it is actually rather fragmented, with occasionally less than smooth cooperation between the various DGs (Christiansen 2001) where coherence of initiatives cannot be taken for granted (Elken and Stensaker 2012). Some issues may be addressed by several DGs and the reason as to why an issue ends up in a specific DG does not always follow a very rational logic, such as in cases of venue shopping by interest groups (Mazey and Richardson 2006). Policy sectors at the European level represent different institutional dynamics with varying legal capacity, existing practices and modes for developing policy (Wallace 2010). It is perhaps unsurprising that horizontal coordination is of an emerging interest, especially the OMC (Borrás and Jacobsson 2004).

At the same time, when policies are made in a context with multiple actors and interests requiring coordination, it is likely to lead to competing agendas and less internal consistency (Bish 1978). This is due to the inclusion of rules and conventions reflecting competing institutional logics (Owen-Smith and Powell 2007). Institutional logics here include a set of norms and vocabulary specific to a particular field. This suggests an instrument that has to simultaneously relate to diverging institutional logics would need sufficient levels of ambiguity to deal with such inconsistencies. As such, ambiguity is a necessary means to deal with unclear goals and blurred boundaries (Zahariadis 2003), allowing for multiple translations.

Consequently, the tensions identified here lie in the intersection points of (a) vertical coordination where the OMC has created new space for action that has come in addition to national processes; (b) horizontal coordination between sectors with varying legal capacity and institutional dynamics; (c) internal coordination where varying institutional logics have consequences for the internal coherence of the instrument. As education is one of the areas where the OMC has opened for more action, this suggests that it should be possible to identify a shift in terms of the vertical axis towards more Commission involvement. Given that the EQF concerns more than one policy sector, one should expect intensified horizontal coordination. Furthermore, one can also expect the EQF to inhibit internal tensions due to the various types and levels of education included. These three tensions will be further elaborated in the empirical section and provide a starting point for the concluding discussion concerning the EQF's potential as an instrument generating more integration.

#### THE ESTABLISHMENT OF THE EUROPEAN QUALIFICATIONS FRAMEWORK

Interest in qualifications is not new for the EU. Indeed, a process was initiated in 1986 for ensuring the comparability of qualifications (Cort 2009). The interviewed experts indicated that the initiative was later considered a failure due to it being too complicated. The EQF represents a new kind of thinking based on learning outcomes, including all levels and types of education and informal/non-formal learning. However, formal legal competencies with respect to different levels and types of education vary – while education as a whole has been an area where integration efforts have been incremental and slow, both recognition of professional degrees and vocational training were mentioned in the

Treaty of Rome in 1957 (Corbett 2005). However, the distinction between vocational and professional can be unclear and varies vastly across European countries, especially on higher levels (CEDEFOP 2011). Historically, competence on vocational training created a loophole for action after the well-known *Gravier* decision (*Gravier v City of Liège*) in 1985 where access to education was in principle equalized with access to training. In addition, in areas with clearly professional profile, the EU has adopted a directive for the recognition of professional degrees coordinated by DG Markt (Directive 2005/36/EC), thus a number of university programmes has a relatively well-established recognition system based on a legal directive.

The initial debates about the EQF followed the development of lifelong learning as a policy objective and the debates around the Bologna Process in the early 2000s. The core actors involved at the time came from the European Commission and CEDEFOP with commissioned inputs from diverse experts. The EQF was introduced as an instrument for lifelong learning and mobility. Lifelong learning as an objective can be traced back to the common vocational policy that has been under EU competence from the very beginning (Cort 2009). While the concept was included into EU policy debates in 1993 with Delor's White Paper and focus on the knowledge society, it was only after the 2001 Communication on Lifelong Learning [COM(2001) 678] that it was seriously acknowledged as the key element of becoming a competitive and dynamic knowledge society with well-educated workforce. Mobility is at the very core of the EU education agenda, described by one of the interviewees in this study as "a mantra" (Interview: an expert in the process, April 2013).

As several interviewees indicated, another important source for inspiration for the EQF was the Bologna Process with the introduction of its own qualifications framework (QF-EHEA). Introduced in 1999 as an intergovernmental process, the Bologna Process has become increasingly intertwined with EU agendas (Beerkens 2008; Maassen and Musselin 2009) and transnational in nature (Elken and Vukasovic 2014). While heterogeneity of systems after the Bologna Process has remained (Kehm et al. 2009, Witte 2008), it was viewed as a success story because it showed the possibilities for cooperation. The subsequent introduction of the Copenhagen Process (2002) by the Commission for Vocational Education and Training (VET) mirrored the Bologna Process, and it was also during this process that debates on what levels actually contained again came to focus. The development of EQF was mentioned in the 'Joint Interim Report' of the Council and the Commission in 2004 (6905/04).

In 2005, CEDEFOP published the report outlining the first possible European framework (Coles and Oates 2005). At the time, an expert group with various invited experts, stakeholder organisations, and selected national representatives with relevant expertise was working on developing a proposal for the EQF, also drawing inspiration from the Coles and Oates (2005) report. The same year, a Commission staff-working document 'Towards a European Qualifications Framework for lifelong learning' [SEC 2005(957)] was issued and subsequently sent out to a widespread consultation process with no major opposition. Another expert group was set up for continued work on this and the document, 'Recommendation on the establishment of the European Qualifications Framework for lifelong learning' was adopted in 2008 with a joint Parliament and Council Recommendation (2008/C 111/01) (Recommendation from now on), its main aim was to act as 'a reference tool to compare the qualification levels of different qualifications systems'. The Recommendation text also called for the establishment of an advisory group that would oversee the national processes to assure "coherence and promote transparency". This EQF Advisory Group was later termed as an informal advisory group for lifelong learning in general; interviewees, however, noted that it has become an important arena for further discussions on joint European policy coordination.

The initial deadlines set in the Recommendation were that all national qualifications systems should be referenced towards the EQF by 2010. According to the CEDEFOP representative, this was purposeful: 'if you had said in 2008 that you have until 2020 to do this, you would have lost momentum, the deadlines were purposefully short'; national processes in a number of countries

lagged considerably, but 15 national reports had been published on the EQF portal by the end of 2013<sup>1</sup>. This indicates that, even if there has been no direct legal enforcement to develop NQFs, the process is rather widespread in Europe. In addition, certain third countries have shown interest in the EQF and in 2013 there were concrete discussions on how to link up with the EQF, in particular Bologna signatory countries, but the interviewees also mentioned countries such as Australia.

#### VERTICAL, HORIZONTAL AND INTERNAL TENSIONS OF THE EQF

#### Vertical coordination: Balancing national and supranational interests

The EQF lies at the intersection between national and supranational coordination. Presented as a translation tool and a meta-framework, it has nevertheless led to reforms across Europe. However, taking into account that the instrument is a recommendation and there is great heterogeneity and high levels of institutionalization with respect to national educational systems, the processes have been rather varied, following a rather typical argument of differentiated integration due to heterogeneity of members. However, a number of additional considerations emerge. Formally, the EQF was clearly framed as an instrument for facilitating more mobility and transparency. The instrument was a European "meta-framework" to which *national* qualifications frameworks can be linked, a rather non-intrusive idea if framed like this. According to this logic, developing NQFs is a national process where national systems would only be described, and referencing such frameworks towards a European translation tool would not require any system change. The first proposal Coles and Oates (2005) outlined identified the difference between a *descriptive* (how systems are) and *prescriptive* (how systems should be) framework, and highlighted how any European qualifications framework should be former rather than the latter. An expert interviewee clarified this difference as follows:

Descriptive should be sensitive to the different arrangements in different nations, and would seek to describe with precision and sensitivity existing arrangements, whereas a prescriptive framework would exist in order to rationalize or change existing arrangements, and essentially render them into a more rational form. (Interview: an expert involved in the process, April 2013)

The initial work by Coles and Oates (2005) identified 30 levels that were seen as necessary to sufficiently describe the complexities of educational systems in Europe and assure that the framework is used in a descriptive manner. However, in the interviews it was indicated that this system was seen as too complicated by the Commission and discarded in favour of an 8-level system, and arguably a more prescriptive framework. One explanation for this preference could be European experiences with the failed 1986 project.

However, shifting the framework towards a more prescriptive framework can be seen as an indication of more supranational coordination as it would imply that certain preferences from European level can be transferred to national level by creating a more standardized template for educational systems. As indicated in the interviews, even when describing the systems to achieve more transparency was for many countries the initial purpose, after national qualification frameworks are introduced, 'what we see is that as the national frameworks reform, the reform agendas become more important'. This suggests that, while the instrument initially proposed was relatively neutral, its content has facilitated critical debates. First, the shift towards output thinking was rather new in a number of countries<sup>2</sup>, and the development of overarching NQFs has largely intensified the process in recent years. At the time of introducing the EQF, there was only limited number of European countries that had a qualifications framework (e.g. Ireland). Second, the focus on informal/non-formal learning, and parity of esteem between VET and HE are other debates emerging in the aftermath of the EQF. One example of such

debates can be found in Norway where the initial starting point was clearly to describe the system and discussions on informal/non-formal learning were avoided. More recently, this has changed and these issues became increasingly important policy issues following the development of NQF.

While the formulations of the intended reform are relatively conservative, there was awareness within DG EAC about this when the instrument was introduced, which a senior EU official described as:

There are two purposes in relation to EQF, one is in terms of transparency, coherence and comparison, the other is to, it is implicit rather than explicit, that is to provide a basis for developing NQFs and further develop LLL [Lifelong Learning] and it is up to the member states whether they want to use it for reform. Not all have used it this way of course, but some have said it has meant they have to reassess existing levels, so it becomes a catalyst for reform in these countries. In other countries it is more for the purpose of increased transparency and openness but not beyond that (Interview: European Commission (former), March 2013).

This variation was described by one EU official as, 'It is now up to the member states, but it is driven at different pace' (Interview: European Commission, March 2013). This could suggest that the intention for the reforms is there. The general view of seeing the EQF as a "catalyst for change" is echoed in a number of the interviews, implying that this particular phrase has been used sufficiently to become a natural way to describe the framework. While the Commission representatives formulate this as "an option", others who have been involved in the process in the EQFAG identify a much stronger role: 'this has been a fantastically important catalyst for the modernization of some educational systems' (Interview: an expert involved in the process, March 2013). In the interviews, EQFAG representatives also reported some countries adjusting some qualifications in their system to better fit with the qualifications framework (e.g. Luxembourg).

While formally the EQF should be about finding the best match between the descriptions of qualifications on European and national level, in practice three top levels were earmarked for higher education. This in turn has spilled over to other levels: the school-learning certificate is now also informally defined on a particular level in the EQF (level 4). Some countries initially suggested their school leaving certificates either as higher (the Netherlands), or in fact lower (Estonia), but both of these countries have opted for high school diplomas to be on level 4 in their final reports, something that was also described as a political agreement following informal pressure.

One should not underestimate the potential implications of the instrument to drive reforms in the future. Despite the process being framed as a nationally driven voluntary OMC-like process, it has provided the Commission with the means to exert independent influence and share preferences. The EQFAG can be an arena for such influence, as both Commission officials and national representatives described its scope and function as being beyond the EQF referencing process, as it is increasingly seen by its members as an important arena to develop shared vocabulary and discuss possible further joint policy coordination. More recently, the group has acquired the role to oversee the Council Recommendation on the validation of non-formal and informal learning introduced in 2012 (2012/C 398/01), indicating its widening scope. One could argue that this group is an arena for a reinterpretation of the scope of what is possible within the subsidiarity principle, there is now more interest from national level to view what others are doing. One Commission official described this as:

We all know it is difficult, but I think governments wanted to have that [EQF]. [...] It was pushed by the Commission, true, we have probably pushed this to the countries, but it came at a time. [...] It is a EU tool, and even if it is soft law, it influences the thinking and the approaches on an issue. [...] Understanding the role of education and research has helped to overcome the traditional problems of EU competence. But it was a discussion. Each time we had advanced on instruments, [...] there was resistance, a long standing battle [laughs], it still is by the way. (Interview: European Commission (former), April 2013)

The comparison to a battle suggests that there was also explicit will from the Commission to assure the success of its preferences even when met with resistance. According to another EU actor, this has in fact led to a gradual redefinition and stretching of the subsidiarity concept:

What I see is that there is more and more space for the EU to create new tools and provide assistance. And that is requested by the member states. A few years ago that could have been thought as a breach of the subsidiarity principle, nowadays it is not. The reason is that most of the problems that the educational systems face, they are common problems. (Interview: European Commission, March 2013)

While the EQF cannot entirely account for this development, several respondents stated that the EQF has a rather important part in the process as it concerns the very landscape of educational systems. It should be noted that the development of a NQFs on paper cannot be taken to automatically imply actual impact. Furthermore, the EQF does not entail automatic recognition and it has not been taken into use by the actual users of the instruments (learners, workers, businesses, etc.). At the same time, the creation of new arenas (EQFAG) has created an arena for joint discussions and there appears to be willingness for more joint coordination. If this is the case, the vertical tension between national resistance and more supranational coordination might move towards increased communicative and coordinating power for the EU, even if formal legal and executive competencies remain unchanged, following the argument of Susana Borrás (2008) on partial transfer of competencies.

#### Horizontal coordination: The EQF as facilitating more sectoral coordination?

The EQF lies at the intersection of different EU policy sectors. Its dual focus on education and employment was evident in the Recommendation, as the aim of the EQF is to: 'promote both *lifelong learning* and equal opportunities in the knowledge-based society, as well as the *further integration of the European labour market*, while respecting the rich diversity of national *education systems*' (own emphasis). Furthermore, coordination process between various policy sectors is also related to varying legal EU competence and administrative structures — with its aim at increasing transparency of qualifications, its function and operation overlaps partially with the directive of professional qualifications (Directive 2005/36/EC).

The professional qualifications directive appears to be a difficult topic within the context of EQF. The directive is linked to free movement of professionals, which means that, for selected regulated professions (e.g. some medical and veterinary professions, as well as architects), qualifications from other EU member states are to be recognised on equal grounds with national ones. The directive operated with five levels of qualifications for these professions. When the EQF was initially developed, this was not well received by DG Markt, described by one high ranked Commission official at the time:

That was a bit difficult as well, the directive [...] was a key piece of the internal market. And our colleagues from Internal Market were not absolutely happy about EQF in the beginning, so we had to find a good relationship. But as the directive is difficult to apply and limited [...] finally everyone was happy to have EQF to complement in a way that is more soft law. But it took time. (Interview: European Commission (former), April 2013)

The directive has, as described, been a core EU instrument, and as such there was also great caution from the side of DG EAC to not interfere, described by another Commission official as:

DG internal market keeps a very close eye, because they manage the directive [.] They are very jealous of their domain, as they should be. Internal market is the European competence per excellence, this is a powerful instrument, so we have to be careful to not reduce the

impact of internal market instrument to promote other instruments. (Interview: European Commission, March 2013)

While the first quote here suggested that the tension has been resolved, this does not imply smooth coordination. The directive was amended in 2013, and some of the initial proposals included a suggestion to replace the existing 5 levels with the 8 EQF levels to assure more complementarity. However, this was removed during the readings in the Parliament. EQF is mentioned as process in the final amendment, and it is emphasised that the five levels the directive operates with should only be used for the general system and should not have an effect on national structures. Furthermore, the document makes references to a common training framework based on EQF levels to describe a common 'set of minimum knowledge, skills and competencies necessary for the pursuit of a specific profession'. As such, the final version does leave some opportunities to use the EQF in the context of the directive. The choice to *not align* the two instruments more closely was met with some resignation from the experts working with the EQF:

'To me it's... it does not make sense to have several European systems of classification like that. That definitely does not make transparency easier, on the contrary. I don't really understand why it is so important for some people to have another level descriptors and five levels and etc. [...] Why this is so important to keep five levels. I see this goes on, and I really don't understand why. (Interview: expert in the process, April 2013)

The actual reasons for why the EQF levels were not used in the directive would in this case be a speculation, but information from the interviews suggests that this might be due to the fact that the five levels are well known and established in these professions, whereas NQFs are still not sufficiently developed in many countries as EQF is not yet seen as a mature instrument.

Besides DG Markt, another horizontal coordination process with respect to the EQF was DG Employment. When the EQF was adopted in 2008, DG Employment was not very enthusiastic, being described by a former DG Employment actor as:

I remember saying, my god what are they doing with these people in education, why do they come with this system. [...] And then interestingly enough, this is where much more than in the past both at European and national level people dealing with employment on the one hand and dealing with education on the other, had to work together. Which was, let's say, not really obvious. (Interview: European Commission (former), April 2013)

One should note that there was also a change in leadership between DG Education and DG Employment around the time of the introduction of EQF. Individuals can act as carriers for policy ideas when they move between various organizations due to subsequent socialization processes (Elken and Vukasovic 2014). This can provide opportunities for better translation and coordination process between these two DGs. More recently, DG Employment has introduced ESCO (European Skills, Competencies and Occupations taxonomy), which is coordinated with the EQF. ESCO is jointly coordinated by DG Employment and DG Education, and supported by CEDEFOP. In principle it is about standardized translations and categorization for skills, competencies, qualifications and occupations. The project was first introduced in a staff working document [ESCO (2011a) SEC 056 final] and then developed by a team composing of representatives from the Commission, CEDEFOP and consulted experts and stakeholders. While this can be seen as an example of more coordination, for those working with the EQF outside of the Commission in the EQF advisory group, these activities are seen as fragmented:

The EQF is not just related to education, but also work. So it should be related to the DG Employment, also ESCO is about education and work. But I think still this is a long process and

long way to go. It is two different [...] [worlds]. For the citizens it is important that they are coordinated. But this is a challenge. (Interview: expert in the process, March 2013)

DG Employment and member states have traditionally understood concepts such as "qualification" or "certification" rather differently. While the EQFAG has provided the arena to develop a common language, there have also been concerns with the EQF and its opening up of the idea of qualifications, and potentially even threatening the role of formal education as a certifying institution. While the representatives from the educational sector see the EQF as imbued with ideas from the world of work, representatives of employers' organizations report of a very "educationalist" approach to the debate, where there has been insufficient attention to including employers' views. This is also related to the composition of the EQFAG that is dominated by people from the ministries of education, DG EAC and stakeholder representation that is primarily linked to education sector. Several actors highlighted that the Commission has had a much stronger preference and experience with this kind of coordination than the member states or stakeholder groups; according to advisory group member:

I think the Commission sees the EQF more in terms of employment policy than we would [...]. We would have just the QF should cover all parts of education [...] preparation for employment sure, but also preparation to citizenship. (Interview: expert in the process, February 2013)

This implies that while the coordination between these two sectors is not by any means smooth and coherent at this point, the first steps are taking place on European level, and have the potential to have a spillover to national level in the long run. These two illustrations show how the EQF is located at a tension point of horizontal coordination between sectors, in one instance (with the directive) the processes and instruments remain fragmented, whereas the example with education and employment suggests an emerging coordination process.

#### Internal coordination: consistency of the instrument

The EQF is also placed at the intersection of various levels and types of education because its content and scope. Different types of education have varying experience with European coordination and also varied status, history and structure at the national level. The issue of internal coordination and ownership has been high on the agenda throughout the development of the EQF. This is particularly relevant with respect to the QF-EHEA developed in the context of the Bologna Process. QF-EHEA covers higher education and is clearly formulated as a framework focused on formal educational systems. At the same time, the EQF is expected to cover all types and levels of education – and these have rather different internal logics (for instance: formal vs. informal learning; general education vs. VET vs. higher education (HE); education for citizenship vs. training for labour market). In EU documents, the two processes have been termed complementary, and one Commission official even mentioned thoughts about merging the EQF and QF-EHEA, even though it was emphasised that there would be legal complications. The relationship between the two frameworks is at the same time not completely problem free, in particular due to their open (learning in all situations) vs. closed (learning in formal settings) nature. During the initial stages of the process there was also great consciousness about this tension, as experts who had experience with Bologna were included in the initial expert group. According to one interviewee, despite initial tensions there was 'willingness from both sides to bring this together' (Interview: expert in the process, March 2013). This suggests that on the policy level there was consciousness of this internal coordination process.

Assuring internal coherence is an important objective for the Commission. According to one EU official: 'to put some more convergence between university and vocational systems, that is the long term commitment of the Commission' (Interview: European Commission (former), April 2013).

However, this process has not been smooth and the initial stages were characterized by tensions within the Commission DG EAC between the groups working on higher education and vocational education. Furthermore, despite coordination with experts from Bologna, some European level representatives from higher education felt that the process did not include them sufficiently:

there was a feeling that some people in the vocational education [...] had hijacked this agenda, and not intended to have a LLL framework but a vocational education framework. [...] In the end, the perception persisted for a very long time that this LLL framework was only in title and what was on the table is a vocational framework, with a different terminology and a different way of thinking of things. (Interview: expert in the process, February 2013)

This has been a great concern for the Commission, because from their side there have been worries about the instrument being dominated by VET both in terms of ownership and operational responsibility, whereas the stated policy objective of the instrument is related to LLL and covering all types and levels of education. One explanation provided by interviewees was that the existence of QF-EHEA created an impression that, if there was a framework for higher education, the other framework had to be about "something else" (VET). Another explanation could be related to the LLL agenda in itself has been traced back to VET and EU competencies in vocational training (Cort 2009). Furthermore, while the stated tension is often focused on VET vs. HE, there is actually little debate on general education and its role in EQF, nor is this issue discussed in the advisory group; there are no umbrella organisations at European level that would be appropriate and representative.

However, through creating the EQFAG, a new common arena for debates across educational levels and types has been created, the very existence of such an arena encompassing all these different sectors can be seen as a rather novel structure — not only on European level, but also taking into account national contexts, where various kinds of education in many cases have traditionally been rather separated (i.e. HE vs. VET). The remaining tensions that were reported in terms of VET vs. HE suggest that the EQF has to cater to very different audiences and deal with a number of interests that can at times be conflicting. Advisory group members reported on the situation where member state representatives coming from different units within the same ministry did not even know each other. By creating linkages between such units and developing a common language across education types, this can also in the long run lead to more communication and coordination.

#### **CONCLUSION**

In this article, the EQF was analysed as an instrument characterised by three sets of tensions. First, it was identified as existing in a tension point of vertical coordination due to the division of competencies between European and national levels. The case of EQF shows a much more complex division of competence than the traditional supranational vs. intergovernmental divide. In that sense, perhaps the term of partial transfer of competencies (Borrás 2008) best describes the emerging picture where coordinating and communicative competencies have been transferred but not the formal legal executive competencies. The accompanying indirect reform ideas within the EQF as well as shifting understanding of what is possible within the subsidiarity principle indicate that the balance of intergovernmental OMC processes and supranational influence is not static but in state of motion. Indeed, the practice around EQF suggests that it is a far more complex hybrid and informal structure. However, despite widespread processes of introducing NQFs across Europe, it is yet unclear what the resulting impact would be following domestic policy processes.

Second, the issue of qualification frameworks has relevance for various sectors both on European and national level and coordination between such sectors is dependent on the EQF becoming a mature instrument. The EQF case re-emphasises the Commission's fragmented nature (Christiansen 2001),

where the divide between DG Markt (directive) and DG EAC (EQF) approach to coordinating qualifications remained in place, even after the amendment process that could have, in principle, integrated the instruments. While the introduction of ESCO and links with EQF suggest more coordination of employment and education sectors, there was still a reported separation on content level with respect to education and the world of work. At the same time, there appears to be conscious effort for achieving more coordination in these areas. In this specific case, it appeared that coordinating multiple soft instruments was a smoother process than mixing policy coordination processes with EU hard law.

Third, the EQF spans the whole system of qualifications – formal and informal learning as well as various educational types and levels, pointing towards diverging traditions, logics and interests within the instrument. There appears to be some collision between VET and HE in terms of ownership and the purpose of the framework, possibly also driven by the parallel Bologna framework – QF-EHEA. The debates concerning the boundaries and content of the instrument suggest that, despite the apparent success of developing qualification frameworks across Europe, the actual content of such frameworks can be rather different. While the EQFAG has provided an arena for debates across types of education, its actual impact on national level practice remains to be seen.

These three sets of tensions imply that the EQF as an instrument is ambiguous and open for translation. This is necessary for the instrument to be able to cater to heterogeneous national contexts, which supports arguments for differentiated integration. Over a short time, the idea of having qualifications frameworks on national and European level has become relatively uncontested as there appears to be little principal objection to the very existence of such frameworks, even in cases of doubt regarding the long-term implications and impacts. While the impact of the reform agenda has been uneven and proceeded along various speed, the EQF can be seen as a successful case upholding the Commission's preference in an area where coordination had previously been met with resistance. At the same time, one can anticipate that the ambiguity of the EQF can also lead to further differentiated integration in the future. Introducing instruments on national level that look similar but contain different understanding of core concepts (due to the internal tensions) might in the long run undermine the process. This can take place when the common goal might become too ambiguous and open for translation. While one could argue that this kind of ambiguity can become a self-reinforcing process, one should not underestimate that a system and structure for joint action with respect to educational systems in Europe has been created. The EQFAG is one such arena and can be seen as one of the more concrete successes, which can provide the arena for reducing internal tensions over time.

This article has had a rather broad focus on the EQF and the three tension points. Further research could explore its potential and the role of the EQF as a new governance tool, the EQFAG as a new informal governance arena, and the implications of the informal widening of the subsidiarity principle. Furthermore, analysis could also focus on how such instruments change educational practice, the specific role that EQF has played in countries undergoing reform. Other avenues for research could focus on the relationship between the EQF and the Commission's expanding role in higher education, and the actual impact of EQF/NQF processes – both on national level and for educational practice.

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<sup>&</sup>lt;sup>1</sup> http://ec.europa.eu/eqf/documentation\_en.htm. Accessed on 20 August 2014.

<sup>&</sup>lt;sup>2</sup> A report by S. Adam "Using learning outcomes" in 2004 for a UK Bologna seminar identified a rather varied picture with respect to the use of learning outcomes across European countries where only limited countries had substantial experience with having implemented learning outcomes at the time.

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