

Position paper

UEAPME¹ updated paper² on the current implementation of the European tools EQAVET, EQF, ECVET

1 - EQAVET³- State of play of implementation

Current situation: According to the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET) Survey in 2012, most Member States have developed national approaches for the implementation of EQAVET and set-up Quality Assurance Reference Points in line with the Recommendation. Moreover, the Bruges Communiqué has set an objective for Member States to develop Quality Assurance frameworks at national level for VET providers that also apply to workplace learning compatible with EQAVET by 2015.

Challenges: Numerous Member States have received country specific recommendations through the European Semester to improve the quality and labour market relevance of their VET systems. At the same time VET systems and provision varies considerably across the EU. Just as VET comprises different forms of initial VET, continuous VET, including informal learning and work-based models, similarly training providers can be any organisation, such as companies or higher education establishments offering training, or an individual. Member States are also at different starting points regarding quality assurance in VET with some more advanced than others.

Position of UEAPME: UEAPME supports EQAVET as a toolbox to improve quality assurance, transparency and mutual trust in VET according to the situation in Member States. According to UEAPME the following issues related to EQAVET deserve particular attention:

- supporting implementation by facilitating cooperation between Member States, social partners and other relevant stakeholders at EU, national, regional and sectoral level in the whole process and notably through the National Reference Points;
- demonstrating higher employability and outcomes;
- encouraging peer learning and good practice dissemination through QALLL and EQAVET projects and others related to lifelong learning;
- coordination with the other instruments developed at European level, namely ECVET and EQF.

From an employers' and SME perspective quality assurance management has to be adapted to the needs and reality of VET providers and their specificities. Quality assurance should be implemented in a userfriendly,

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

² http://www.ueapme.com/IMG/pdf/UEAPME_Opinion_on_the_Implementation_of_the_European_Tools_EQF_ECVET_EQAVET.pdf

³ The EQAVET Recommendation contains a set of indicative descriptors and indicators at system and provider level for quality assurance in VET

simple and cost-effective way. Small VET providers and small enterprises have to feel that working with quality assurance is relevant for them. Intermediary bodies, such as Chambers of Skilled Crafts and Commerce play an important role to support SMEs with tailored implementation.

Given the high level of unemployment and particularly of youth unemployment in Europe, a focus on employability and outcomes is essential. UEAPME considers the indicators No. 5 and 6, i.e. placement in VET programmes and utilisation of acquired skills in the workplace as very useful. There is also a link to the EC benchmark on the share of employed graduates from education and training, which should be more closely examined. The input based indicators No. 1 and 2 are less adequate, since they focus on the relevance of quality assurance systems for VET providers and investment in training of teachers and trainers, whilst not demonstrating actual results.

Regarding good practices, UEAPME points to the German EQAVET project ENIQAB⁴ for quality assurance with a focus on work-based learning in SMEs as a pertinent example. It aims at combining EQAVET with the German national initiative. It looks at developing userfriendly quality assurance guidelines and how quality assurance can make SMEs more attractive as employer at local level and thus facilitate recruitment and better match skill requirements.

Further greater coordination, synergies and consistency are needed between EQAVET, ECVET and the EQF. This should also enhance permeability and flexibility between general education and vocational education and training at all levels and notably at tertiary level and employers should have access to the relevant information, instilling confidence in the learning outcomes.

Finally, the development of a quality label at European level has been an issue lately. UEAPME sees no added value for creating a European-wide label. On the contrary, it risks being counterproductive leading to crowding out training providers, at a time when all efforts should be geared towards employment.

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⁴ The European project "Europeanisation of the National Pilot Initiative for Quality Development and Assurance in Company-Based Vocational Education and Training", ENIQAB

2 - EQF - State of play of implementation

Current situation and expected added value: Today 16 countries have completed their National Qualifications Frameworks and have referenced them to the EQF (European Qualifications Framework). 13 more Member States or candidate countries are planning to present their referencing reports by the end of 2013. Although the deadlines stipulated by the EQF recommendation of 2008 have not been met by most countries, NQF implementation is well on its way. On the other hand, however, one has to acknowledge that most NQFs, even those that have already been referenced to the EQF are far from being completed.

Challenges: Despite the same “rules of the game”, NQFs differ tremendously. There are differences in scope, i.e. in some countries the NQF covers all subsystems, in others only specific qualification types. More worryingly there are also clear signs of inconsistencies concerning the placing of similar qualifications at different levels. UEAPME is especially concerned about ensuring a consistent referencing of VET qualifications. The current developments give reason for concern that this is not always the case: Qualifications at skilled worker level are placed at level 4 in most countries, by contrast some countries place them at level 3. The same differences occur at the levels of higher VET qualifications. For example, the master craftsman qualification is at level 6 in some countries (e.g. BE-German community, AT, DE). However, it has been placed or is likely to be at level 5 in other Member States (FR, LU, PL) and possibly lower as it is the case in Slovenia.

Position of UEAPME: UEAPME supports the general idea and objectives of the EQF and in particular the principle of parity of esteem between general education and VET that lies at the heart of the EQF recommendation and specifically the EQF descriptors. As the EQF and the underlying NQFs should be more than an education policy instrument, it is of highest importance that stakeholders from the world of work are consulted and included in the development of the frameworks in the different Member States.

With reference to the goals of the Europe 2020 Strategy and specifically the objective for 40% of young people to have a higher education qualification or equivalent, this principle of “parity of esteem” between different types and profiles of qualifications will hopefully one day lead to a more balanced and more realistic view of what makes an individual highly qualified than this is possible today, when statisticians and policy-makers have to resort to “higher education” as measured by ISCED.

At European level UEAPME sees the necessity of an adequate coordination by the European Commission. The placement of similar qualifications at different levels in their respective NQFs is as such no problem, even if these qualifications use the same title or wording. It is however crucial that such a different placement stems from a difference in learning outcomes and is not due to political or administrative differences between member states on how certain qualifications are treated or perceived. It will therefore be necessary to systematically analyse specific similar qualifications in order to identify inconsistencies between countries and to allow for possible adjustments in the respective NQFs.

UEAPME proposes that such plausibility checks on the placement of similar qualifications in different countries become a priority for action in the coming years and that different instruments available at European level, notably peer learning activities, but also the new EU education, training, youth and sports programme are used to address this pertinent issue. It will be important to understand NQFs as a constant work in progress with the possibility of having second and third rounds of referencing.

Special attention needs to put on the planned EQF portal, which intends to link the different national qualification databases. This portal needs to be userfriendly for SMEs.

In order for the EQF to reach its desired objectives in terms of improved transparency and visibility, UEAPME deems it essential that the EQF/NQF level of a certain qualification is mentioned on the qualification directly. Indicating the EQF/NQF level only in accompanying documents, such as the certificate supplements, will not be enough to give the EQF/NQF approach its desired effect and is furthermore not in line with the EQF recommendation itself.

Furthermore UEAPME sees the need for a better coordination and complementarities between the various EU transparency tools. For example, there is a need to create a better link between the EQF, EQAVET, ECVET and ESCO.

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3 - ECVET - State of play of implementation

Current situation and challenges: The commitment of the EU Member States concerning the European Credit system for Vocational Education and Training (ECVET) is still very moderate. A reason might be that most Member States do not see an added value of this instrument. Nevertheless the EC has initiated a bunch of different initiatives to promote ECVET:

- ECVET Users' Group
- ECVET Network
- ECVET network of the National Agencies
- Network of national ECVET experts financed by the EC
- ECVET pilot projects (2009 – 2012)
- Second generation of pilot-projects (2010 – 2013)
- Community of practice portal – bridge ECVET-ECTS

However, there is a lack of transparency in this constellation of structures and activities.

Position of UEAPME: Not all elements of ECVET are applicable in the national contexts, especially the use of ECVET points and the assessment, transfer and recognition of units of learning outcomes. Concerning the examination there are strict limitations due to national legislation. A partial revision of the ECVET recommendation on the basis of the results of the pilot projects seems to be necessary to overcome the current limitations.

UEAPME still considers that ECVET should be a voluntary instrument to facilitate transnational mobility and permeability in VET.

Important for a successful implementation of ECVET is an appropriate infrastructure, as it is not very likely that SMEs will use ECVET without guidance and support. In this context the intermediary organisations, such as chambers of skilled crafts, can play an important role.

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