

Position Paper

UEAPME¹ position on ‘A New Skills Agenda for Europe’

This paper contains UEAPME’s position on the EC Communication on ‘A new Skills Agenda for Europe’ as a whole and the different tools and actions foreseen in its context. A separate position paper is dedicated to the Skills Guarantee at http://ueapme.com/IMG/pdf/UEAPME_position_on_establishing_a_Skills_Guarantee.pdf

I. Introduction

The European Commission on 10 June 2016 published the New Skills Agenda for Europe, a package of measures with the aim to ensure that the right training, skills and support is available to European citizens. It will do so by making better use of the skills available and equipping people with the new skills that are needed.

The Commission has foreseen ten actions to achieve these goals, of which several have been published thus far and more should follow over the course of 2017.

Executive Summary

- UEAPME welcomes the new Skills Agenda for Europe, for better and more relevant skills. The lack of basic skills, skills shortages and mismatches are among the main Crafts and SME concerns throughout Europe.
- UEAPME’s priority is to make education systems more responsive to the labour market, and ensure that the skills taught are relevant for people’s lives and for the economy. To achieve this, a continuous focus on Education and Training reforms will be crucial.
- UEAPME welcomes in particular **the intention to strengthen Vocational Education and Training (VET)** and to improve its quality and ‘make VET a first choice’.
- UEAPME agrees with the recognition of digital skills as a third basic skill next to literacy and numeracy.
- UEAPME supports the Skills Guarantee as an effort for up-skilling people, if it is used to enable a smooth bridge towards VET and the labour market. However, the concept of a “Skills Guarantee” is inappropriate as it will create wrong expectations, especially without additional financial means. EQF level 4 as objective is too ambitious and needs to be revised. See UEAPME’s [position](#).
- SMEs and micro-companies, to be part of the solution in lifelong learning, will need support to overcome a number of obstacles in upskilling or re-training employees as well as entrepreneurs themselves.
- The EQF needs to be further implemented as a consistent transparency tool to compare qualifications in view of facilitating labour mobility. This requires a strong involvement of social partners at all levels.

¹ UEAPME subscribes to the EC’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

II. General comments

UEAPME welcomes the ‘New Skills Agenda for Europe’, as a comprehensive and important policy effort in the field of education and training. The lack of basic skills, skills shortages and mismatches are among the main concerns of Crafts and SME throughout Europe. The need to up-skill the European workforce is urgent and requires comprehensive actions.

Education and training systems need to respond better to labour market needs and deliver higher and more relevant skills. These are essential to **sustain Europe’s competitiveness and enhance job creation, growth, productivity, innovation, and social inclusion**. This will also improve people’s **employability** and give them perspective for the labour market and for their life.

UEAPME agrees with the policy focus on **three work strands**:

- Improving the quality and relevance of skills formation;
- Making skills and qualifications more visible and comparable;
- Improving skills intelligence and information for better career choices

III. Skills Agenda: an SME priority

A) On the challenges

UEAPME broadly agrees with the **challenges** outlined in the Communication. The **lack of adequate reading, writing, numeracy, and digital skills** is striking and represents a serious danger for Europe’s competitiveness and ability to create jobs and make people employable. Improving basic skills levels contributes to people’s abilities to play a full role as citizens in an information society and is as such relevant for life.

The lack of basic skills is felt strongly by Crafts and SMEs – from those companies training apprentices or hiring graduates who have demonstrably weaker performance which is essential to perform basic tasks, to those enterprises increasingly requiring IT and other advanced skills. In addition, existing skills shortages and mismatches show that **education outcomes are often not in line with what is needed on the labour market**. The **ageing and shrinking EU workforce** poses a further challenge of skills shortages requiring innovative approaches, inclusive labour markets, and quality education and training systems taking up the responsibility to provide the skills that are needed for the economy.

New technologies and the changing world of work require **new basic digital skills** as well as **transversal skills** and the ability to adapt quickly. As a result, basic skills will even increase in importance as the foundation for any further learning, for access to work, and to play a full role in society. The process of digitalisation requires that a vast and comprehensive strategy for digital skills is developed for education and training systems. UEAPME agrees with the Commission’s recognition of digital skills as a third basic skill. See further: [Action 4](#)

The current focus on digital skills should not overshadow the increasing **need for ‘green skills’** related to environmental and energy transitions.

B) On solutions

Benchmarking and national reforms

In order to catch up with existing skills gaps and to be able to adapt to changing skills needs, short- and long-term solutions are needed. Primary and secondary education bears the main responsibility for the acquisition of basic skills. **UEAPME considers modernising education and training throughout Europe of paramount importance.**

UEAPME fully supports efforts to promote national reforms through the **Open Method of Coordination** used under the E&T2020, the **Copenhagen process on VET** with the 2015 Riga conclusions on work-based learning as well as through the **European Semester**. The EU has a strong role to play in analysing broader trends and in coordinating efforts of Member States to modernise education and training systems with social partners' involvement where appropriate.

EU benchmarks related to education and training have proved their usefulness in achieving common objectives. A benchmark for Vocational Education and Training (VET) notably on work-based learning could be added for measuring employment and skills outcomes (e.g. as share of overall initial VET, the share of training time spent in a company, or employability rates).

Higher and more relevant skills through VET

UEAPME notes the acknowledgement by the Commission that the good employment outcomes of VET are undervalued and hence of the importance of its promotion for overcoming the challenges. SMEs and provide a large part of work-based training opportunities including through apprenticeship placements. **UEAPME is firmly convinced of the strategic relevance to strengthen VET and to make it a first choice as foreseen in the Skills Agenda.** UEAPME also welcomes additional financial instruments supporting SMEs in training provision as proposed by the EU Commission, but insists **that VET and apprenticeship systems including dual learning can only be successful if underpinned by ownership and involvement of business organisations and social partners in their design, governance and implementation.**

In addition, higher and more relevant skills should be taught through **promoting excellence in VET, bringing VET to higher levels of education, and increasing learning mobility opportunities.**

- See further: [Action 3](#)

Lifelong learning approach: support needed for Crafts and SMEs

The lifelong learning approach is one of the most important policies for up-skilling the European workforce. SMEs and especially micro-companies are often engaged in “on the job training” through a non-formal approach. Because of the specific nature of up-skilling and re-training in a small company, **to be part of the solution, SMEs will need support to overcome a number of obstacles.** These are related to limited financial resources, the impact on production processes of sending people off on formal training, the lack of adapted training programmes or awareness of training offers, the lack of motivation of workers for further training, and the risk of workers leaving the company after completing their training.

- See further: UEAPME's [position](#) on the EC proposal for a Skills Guarantee

Entrepreneurial skills

With the increasing importance of transversal skills, entrepreneurship and entrepreneurial mind-sets need to become a high priority for the European economy. Entrepreneurship education should start early and more efforts are needed to change mind-sets and promote entrepreneurship as a career choice. UEAPME welcomes the plan to review the **Key Competence Framework** but believes that this process needs to be speeded up notably in the Member States. The Entrepreneurship 2020 Action Plan should be revitalised.

- See further: [Action 2](#)

Skills assessment and validation

Changing skills needs on the labour market require **improved methods of skills assessment notably for non-formal and informal training**. For SMEs, non-formal and informal training is part of daily business through on the job learning, as it provides a smooth way into the labour market. UEAPME welcomes initiatives related to making skills more visible, which should serve to increase people's employability by validating skills acquired through these pathways, and thus increase the pool of talent needed on the labour market.²

- See further: [Actions 5 and 6](#)

Skills intelligence

To support the transformation to a digital society it is crucial that changes in skills needs are reflected in education and training systems. To this end, there is a clear **need for improved skills intelligence**, including for skills needs and skills forecasting. UEAPME broadly welcomes the Commission's ambitions through a sectoral approach. To ensure accuracy, it is highly necessary to perform checks at national, regional and local levels. **SMEs rely to a great extent on the support of business organisations and professional chambers to anticipate labour market evolutions and adapt the curricula and training offers accordingly.**

- See further: [Actions 7-10](#)

C) On tools

Over the years, the EU has developed several transparency and quality tools with the objective to enhance cooperation between Member States in the field of education and training. Practically all these tools are being addressed in the Skills Agenda, either for revision or for further development. As a general remark, UEAPME finds it important that actions should be limited to areas **the EU can bring clear added value** in comparison to national efforts, as Education and Training policies are essentially the competence of Member States.

Secondly, when revising existing or developing new tools, it is important to set **realistic objectives at EU level**. This should also be accompanied by adequate use of financial resources. Education and training systems in the Member States are the product of sets of cultures and practices that need to be respected, especially when they lead to added value for learners and companies. **Cooperation at EU level should promote a better understanding of the different systems and should be a driver for reforms**, but cannot replace the logic of national education systems.

² See further UEAPME's position on the EC proposal for a Council Recommendation on the validation of non-formal and informal learning (2012): http://ueapme.com/IMG/pdf/UEAPME_PP_proposal_Council_Rec_NFIL_Final.pdf

Thirdly, **the relation between and the scope of different transparency tools is still unclear in some cases**. UEAPME supports efforts to streamline documents, improve synergies between and integrate European initiatives while respecting the national and regional structures of skills providers. Clarification of objectives, and **piloting with new tools** to ensure their relevance and user-friendliness is essential to avoid overlaps and 'shopping lists'. Tools need to be useful for stakeholders on the labour market, including competent authorities, national centres, social partners, business organisations, chambers of crafts and chambers of commerce, training centres and end users. **UEAPME calls for a strategic approach to make the different tools user-friendly, and for an assessment of the use of instruments by various stakeholders and a consultation on what should be further developed.**

The European taxonomy for skills and classification of occupations (**ESCO**), which is currently under development, might be a useful tool to promote better matching on the European labour market once it is completed with a fully operational final version. Furthermore ESCO is introduced as a translation tool between the labour market world and the world of education. However, it is already integrated in several legal texts of the Commission without an explicit mandate. **UEAPME insists that the real relevance for the labour market is proven first. Before applying it as an EU tool, time should be taken for ample testing, robust pilots (e.g. with public employment services) and an in-depth evaluation.** Until then, UEAPME deems it premature to give ESCO any legal status.

The role of social partners and businesses in the field of labour market, skills and qualification policies needs to be respected. UEAPME therefore insists that the revision or development of tools at EU level are done only with solid involvement of Member States and social partners. They have a clear understanding of education systems and of impact and relevance for the labour market.

- See further: [Actions 3,5,6,7](#)

IV. Actions

This section elaborates on the different actions foreseen by the Commission in the context of the Skills Agenda.

Improving the quality and relevance of skills formation

1. Skills Guarantee – proposal published

- UEAPME welcomes the principles for upgrading the basic skills of low qualified adults and to enable a smooth bridge *towards* VET and the labour market. It marks an important push for a renewed policy focus on better and more relevant skills.
- However, the term "Guarantee" is inappropriate as it will create wrong expectations, especially as there are no additional financial means foreseen.
- Without new dedicated funding, the Skills Guarantee will bring added value only if Member States will dispose of sufficient flexibility to adapt to national realities and concepts, and target efforts towards specific sub-groups of low-skilled adults.

- UEAPME is very critical of the chosen objective of reaching EQF level 4 which is unrealistic. It further stigmatises people who are perfectly employable with lower levels of educational attainment, and education pathways delivering the best employability outcomes.
- Achieving EQF level 4 requires disproportionate efforts and new resources that are not available. UEAPME requests the removal of a reference to specific EQF levels, which can in any case certainly not remain at EQF level 4.

For UEAPME's full position paper on the Skills Guarantee, see http://ueapme.com/IMG/pdf/UEAPME_position_on_establishing_a_Skills_Guarantee.pdf

2. Review of the Key Competences Framework – foreseen 4th Quarter 2017

UEAPME welcomes the intention to revise the Key Competences Framework by updating it to current and new developments in education and training curricula. **UEAPME regrets however that this action is only foreseen for the end of 2017, which does not adequately reflect the urgency of the needs.**

In addition to existing skills gaps, new technologies and the changing world of work require new sets of basic skills as well as the ability to adapt quickly to other needs such as – learning to learn. As a result, basic skills will even increase in importance as the foundation for any further learning, for access to work, and to play a full role in society. It is of the highest priority that the Key Competences Framework reflects this development as well as transversal skills. The Key Competences Framework, if developed well and with sufficient consideration for different priorities and focus in the Member States, can function as a solid basis for further prioritisation. UEAPME considers that **digital and entrepreneurial skills** should be integrated and further developed as new key competences. UEAPME welcomes the reference frameworks where these competences have been published over the recent period.

Entrepreneurship should be a top priority. **Developing entrepreneurial skills and mind-sets mainstreamed throughout all education pathways is a necessity.** Entrepreneurship should be seen as a valuable alternative to classic forms of employment relationships. VET and apprenticeships as part of “Higher VET” are traditional pathways leading to the creation of businesses and jobs. Creating awareness of such options as well as entrepreneurial mind-sets is of utmost importance from early education on-wards. This should be complemented by integrated specific entrepreneurial skills in both VET and general education pathways. **The Entrepreneurship 2020 Action Plan should be revitalised.**

3. “Making VET a first choice” – initiative foreseen 2nd quarter 2017

UEAPME considers this as one of the most important initiatives of the Skills Agenda and therefore it should not be limited to the possible revision of tools such as EQAVET and ECVET.

Making VET a first choice is essential. Work-based learning including cost-effective apprenticeships are crucial for employability of young people and competitiveness of the economy. Skills delivered by such systems are those most requested by employers. More active promotion of VET, excellence and Higher VET is a must.

UEAPME priorities to improve the quality of VET throughout the EU:

1. Promoting **reforms** of VET and apprenticeship systems at Member State level, e.g. with support of demand-driven 'bench-learning' seminars
2. Developing **benchmarks** with the Member States to improve apprenticeships across Europe
3. Support for **capacity building** for governments, (SME) business organisations, social partners, E&T providers at national and EU levels
4. Bringing **VET to higher levels** of education and promote VET excellence

VET, work-based learning and in particular apprenticeship through a combination of theoretical and practical learning have proven their potential to deliver the skills mix required by the labour market. They facilitate the acquisition of technical and specific skills as well as generic and transversal skills which are necessary for the labour market and the broader society. Therefore, it is essential to **promote parity of esteem between VET and general education**.

SMEs have a long tradition of engagement in work-based learning. They are the main providers of training and apprenticeship places. At the same time, too many young people do not possess the basic skills that are needed to start an apprenticeship. To foster SME engagement, more support will be necessary. It will also depend on more **cost-effective apprenticeship systems with the right governance structures based on strong partnership and ownership**. SME business organisations and Chambers of Crafts should be directly involved in the governance structures, to get ownership of the system, contribute to the process of designing and updating training regulations and curricula in line with the skills needs of companies as well as to ensure the relevance and quality of the respective qualifications. This work needs to be stepped up by committing Member States to the process of reforming and/or setting up apprenticeship systems (e.g. through the Advisory Committee on Vocational Training, ACVT).

Only **demand-led work-based learning and apprenticeship systems** which take into account the needs of companies and the labour market can attract new commitment of SMEs and become a real alternative to general education pathways and get better reputation towards young people and their parents.

Over the years UEAPME has contributed significantly to the promotion of VET and improving its quality and will continue to do so, notably through active involvement in the Copenhagen process on VET, the European Alliance for Apprenticeships, and projects on the mobility of apprentices.³

Higher VET

Promoting "Higher VET", supporting excellence in VET, and bringing work-based learning elements in all forms of general education should become a key priority in the coming years with the objective of reaching higher and more relevant skills. This includes undoing the myth that only general higher education is 'valuable' education. Technical and hands-on skills will remain in high demand by companies, which also attach more and more value to relevance of general education for the labour market.

³ UEAPME has coordinated the "EuroApprenticeship" project, creating a network of competent bodies, intermediate organisations and Vocational Education and Training (VET) providers, which organise "in company learning mobility" or provide expertise, information, help and support to learning mobility projects. See further www.euroapprenticeship.eu

VET at upper secondary or advanced level, including at tertiary level (“Higher VET”), can deliver these skills. **Higher VET is one of the best options to deliver higher and more relevant skills needed on the labour market.** VET systems need to be modernised in view of delivering qualifications which can lead to Higher VET and related excellence. This requires flexibility of and permeability between the different education systems and pathways.

Learning mobility in VET should also be promoted and can contribute strongly to a higher esteem and attractiveness of VET. It also raises the employability of learners through their cross-border experiences. Evidence shows that there is an increasing demand for VET mobility, and that we are far to reach the objective of 6% mobility in VET. However VET, due to its intrinsic dual learning nature, has different characteristics than higher education. Focus should therefore be to make mobility in VET attractive for both, VET learners and companies offering work-based learning. The current Erasmus+ programme is too much geared towards the needs of academic education. For many training providers in VET (including companies offering apprenticeship training) the programme is too bureaucratic. Instead of introducing longer term mobility in VET, other obstacles should be overcome first providing adapted solutions.

Quality assurance in vocational education and training (EQAVET)

EQAVET has fostered the European cooperation in the field of quality assurance in VET. As an important process this should be further promoted, on the condition that the diversity of VET systems is sufficiently taken into account. Rather than as a ‘one-size-fits-all’ instrument, EQAVET currently functions best as a toolbox helping Member States to initiate reforms and assist them in implementation of better quality assurance.

The European Credit system for Vocational Education and Training (ECVET)

UEAPME supports the development of flexible pathways in VET as outlined above. At the same time, credit systems have shown more added value and relevance in general higher education, mainly through the Bologna process than they have in VET. From the labour market perspective, especially SMEs, the added value of ECVET has not sufficiently been proven to justify further development. Recent evaluations further confirm this. The further development of ECVET and its promotion need to be thoroughly assessed.

4. Launch of the “Digital Skills and Jobs Coalition” initiative foreseen December 2016

UEAPME welcomes the Commission’s ambition to embrace the digital transformation and the acknowledgement of digital skills as a third basic skill next to literacy and numeracy.

Digital literacy needs to be taught already in primary and secondary schools and mainstreamed throughout curricula, whereas advanced digital skills need to be taught at later stages.

For upskilling and re-training, SME needs have to be taken into account especially. **Entrepreneurs themselves require external support**, not just in acquiring or upgrading basic digital skills but also in digital proficiency needed for maintaining their businesses such as IT security and safe online trading, using the cloud as an opportunity for growth, building websites, and dealing with data protection issues. Raising awareness of the potential of going digital should be a high priority.

On the other side, **teachers and trainers** should receive continuous training in order to be able to support the transformation and as much as possible to steer it.

The digital revolution has an impact on **education and training methods**. On-line learning and new methods such as Massive open online courses (MOOCs) are becoming more and more part of teaching programmes in all sectors and have a large potential of reaching new audiences and developing alternative ways of acquiring skills and qualifications. A coherent EU strategy for digital learning and open educational resources across all education and training sectors is needed to exploit the added value.

Tools and instruments for the recognition of skills and competences have to take into account that the **acquisition of digital skills takes place in formal, non-formal and informal learning environments**.

The process of digitalisation requires that vast and comprehensive strategies and coalitions for digital skills are developed for education and training systems at all levels. The **‘Digital Skills and Jobs Coalition’** needs to go beyond the Grand Coalition for Digital Jobs launched in 2013 and involve stakeholders including businesses at all levels to upscale transitions towards digitally proficient education and training systems.

Developing coalitions means also **better coordination** within the EU Commission services dealing with the digital agenda, in particular DG Connect, DG Grow, DG Employment and DG Education and Culture.

As foreseen in the **social dialogue work programme 2015-2017⁴**, European social partners will exchange views on the specific issue of digital skills, including the role of digital and distance learning, open educational resources, and e-services.

Making skills and qualifications more visible and comparable

5. Revision of the 2008 Recommendation on the European Qualifications Framework (EQF) – proposal published

General comments

For UEAPME, the EQF has been one of the EU initiatives in the field of education and training which has been most **successful at national level to launch in-depth reflections and discussions about the content and structures of qualifications and the need for change**. UEAPME supported the implementation of the EQF in the Member States under the condition that it is a tool for information and to increase the transparency and understanding of qualifications, but not a regulatory instrument. UEAPME insists on the need for parity of esteem between general education and VET, and in particular between higher general education and higher VET. This parity of esteem should be based on the learning outcomes principle and the EQF level descriptors, which relate learning outcomes not only to a “study context” but also to a “work context”.

⁴ http://ueapme.com/IMG/pdf/FINAL_Joint_Social_Dialogue_Work_Programme_2015_2017.pdf

The transparency objective of the EQF has not yet been fully reached and it is showing weaknesses in delivering on its specific objectives for transparency, better understanding of qualifications and more in-depth comparability. More technical and political work will be necessary for making learning outcomes definition and understanding more homogenous. **The initial objectives of EQF should be further deepened** in order to become a real tool for transparency, better understanding of qualifications and comparison.

UEAPME is of the view that **the referencing process cannot be a one-off exercise but should be a repeated process** informed by e.g. horizontal comparisons, peer learning, pilot projects etc. at European level covering all educational areas. In this context UEAPME deems it especially important to use **context information** as a common reference point which enables a better understanding of qualifications embedded in different country specific settings. For example, for VET qualifications, whose learning outcomes refer to specific fields of work, labour market indicators such as occupations that are typically obtained by holders of such qualifications are needed to complement a more technical and linguistic comparison of learning outcomes descriptions. Other relevant indicators have been proposed e.g. by the EQAVET Recommendation (indicators 5 and 6 of the annex)).

UEAPME welcomes elements in the revised Recommendation that go in this direction such as the **strengthened focus on improving consistency and developing methodologies of levelling and updating.**

UEAPME disagrees with attempts to tackle apparent limitations by using the EQF for the recognition of qualifications. This would go beyond its mandate and purpose. Instead it is important to acknowledge and accept that the national logic of qualifications remains dominant, and that the EQF is still in its very early stages of development. Qualifications are embedded in national labour market contexts and cultures and do not always allow for simple understanding and let alone recognition in other Member States. Recognising this is simply admitting that national labour markets and education systems are intertwined. Limitations will always exist in the EQF and should not be considered as a problem. From the perspective of the labour market, a qualification is no more than a first indication of someone's abilities.

Specific comments

- The **common format** for description of qualifications should be short and concise, and only in addition to what exists in the Member States. This European format should be used to make comparisons of qualifications easier.
- UEAPME can support the introduction of an annex on **principles for credit systems** related to the EQF if it only concerns credit systems that already exist; however this should remain optional and not used to develop credit systems in VET.
- **International Sectoral Qualifications (ISQs)** increasingly become an issue relevant for the EQF. Given the important amount of work that has already been dedicated to it within the current EQF Advisory Group, it is surprising that this issue is not addressed in the EC proposal. UEAPME suggests that **standards and procedures** are developed at European level. This could take the form of an information exchange network on planned ISQ levelling between Member States, and through mechanisms of consultation and conciliation in case of inconsistencies in the levelling of an ISQ.

- **On Governance**, the **EQF Advisory Group** has proved to be a very useful platform and UEAPME is in favour of maintaining it. Creating a new 'platform' integrating several tools is inadequate.
- Before making **ESCO** formal and referring to it in official documents, it is important to first develop a legal mandate, and prove that it has an added value for VET and the labour market, for example through piloting with Public Employment Services. UEAPME is **critical towards attempts for harmonising educational achievements and systems in the EU**. This might have a detrimental impact on quality of successful systems.
- **Third Country National qualifications frameworks**: Although it is understandable and logical to work on qualifications of third countries for the purpose of transparency and labour market integration of third country nationals, UEAPME warns about the **feasibility and desirability of using the EQF for this purpose**. The EQF is currently not mature nor stable enough for cross-referencing with third countries. The focus could be to target regions and countries that are of priority to the EU.
With regard to the integration of migrants, priorities must go further than formal comparisons or even recognition of their qualifications – it is also about screening and validation of their skills in order to better understand the level and state of play of their acquired skills, so that they can be offered further training or an immediate integration on the labour market.

6. “Skills Profile Tool for Third Country Nationals” - initiative foreseen December 2016

UEAPME takes note of the initiative to develop a Skills Profile Tool for Third Country Nationals. Early skills assessment and validation is of crucial importance for the **integration of migrants into education and training and the labour market**. For UEAPME, this skills assessment is of high priority as it is often the first step towards further training. Given its relevance, UEAPME requests to be properly consulted on the on-going work of the Commission in the development of such a tool.

UEAPME members in several Member States, such as economic chambers and chambers of skilled crafts, are working hard at all levels to facilitate this process and have many practices to share, such as **mentoring projects, awareness campaigns, job matching, and the provision of apprenticeship and other work-based learning placements in companies**.

With regard to early or pre-departure skills assessment it is important to take into account the political and practical dimension. UEAPME supports efforts to streamline the mobility of migrants and to ensure matches between skills availability and needs.

The manifold experience of UEAPME members with skills assessment has shown several bottlenecks and the need for strong partnerships at local level. The practical feasibility of early assessment such as the Skills Profile Tool needs careful monitoring. For UEAPME, efforts should not only focus on sharing good practices and developing tools for relocation schemes, but also stepping up the pace of analysing and monitoring what is currently happening in the Member States. This includes **comparative research to better understand the real labour market outcomes** of the different integration practices. A better understanding is very much needed on what works well and what does not in the countries where the migrants end up. As the integration of migrants will remain high on the agenda of Member States in the coming years, **the EU could provide added value by supporting and performing such comparative research and practices on labour market outcomes**.

Advancing skills intelligence, documentation and informed career choices

To support the transformation to a digital society it is crucial that changes in skills needs are reflected in education and training systems. To this end, **improved skills intelligence**, including for skills needs and skills forecasting belongs to the tools to develop. UEAPME broadly welcomes the Commission's ambitions through a sectoral approach. To ensure accuracy, it is important to perform checks at different levels, national, regional, local, and sectoral.

SMEs don't have the resources to identify and analyse the new skills trends. They rely to a great extent on the support of their business organisations very often at sectoral level and a good labour market intelligence to anticipate the labour market evolutions and adapt the curricula and training offer accordingly.

CEDEFOP and EUROFOUND have also a role to play. The work they intend to carry out through a joint survey of employers should be further supported. However, drawing **the right conclusions at macro-level is a delicate matter due to a high risk of inaccuracy** with potentially severe consequences in the field of education and training for the young generation if they are too strictly followed.

Forecasts should always be checked with the local, regional, national and sectoral levels to reduce the risk of inaccuracies in terms of quality, quantity and content.

7. Revision of the Europass Framework - proposal foreseen 3rd quarter 2016

UEAPME will come with a specific contribution on the EU Commission proposal published on 4 October 2016.

However, in particular with regard to the European taxonomy for skills and classification of occupations (ESCO) which is given a legal status in the EC proposal, UEAPME insists that **the real relevance for the labour market is proven first. Before applying it as an EU tool, time should be taken for ample testing, robust pilots (e.g. with public employment services) and an in-depth evaluation.** Until then, UEAPME deems it premature to give ESCO any legal status.

10. Tertiary Graduate Tracking - initiative foreseen 2nd quarter 2017

UEAPME welcomes the initiative to improve graduate tracking in the EU. Due to high levels of unemployment and continuous reforms of education and training systems, it is necessary to monitor closely the **real labour market outcomes of different education pathways**, in order to better compare different practices. In later stages, it would be welcome to extend such initiatives to graduates at secondary (VET) levels.

V. Stepping up the pace

More work-based learning and business-education partnerships

UEAPME believes that **business-education partnerships, involving all sectors and levels of education and training, are at the core of any well-functioning E&T system and hence of the labour market.** Making this a priority, and helping stakeholders understand the importance of these two worlds talking to each other, is of utmost importance.

UEAPME looks forward to further work with the Commission, other social partners and stakeholders on several of on-going commitments such as the work being undertaken on **improving and promoting apprenticeship**, following the priorities in the 2015-2017 joint work programme of the EU social partners. UEAPME welcomes the Commission's intention to develop a set of support services to facilitate knowledge sharing, networking and cooperation on apprenticeships.

More support for learners' mobility

UEAPME have constantly advocated for promoting learning mobility in VET including apprentices as a good way to acquire additional skills and notably generic skills.⁵ This contributes not only to equal opportunities for students in all types of education but also adds to the attractiveness of VET. It also raises the employability of learners through their cross-border experiences. However VET, due to its intrinsic dual learning nature, has different characteristics than most types of higher education. **Focus should therefore be to make mobility in VET attractive for both, VET learners and companies offering work-based learning.**

There is a clear **scope for increasing the budget for mobility**, provided that it is used efficiently and with a better allocation of resources. Evidence shows that there is an increasing demand for VET mobility, and that we are far to reach the objective of 6% mobility in VET. As a result, half of the requests cannot yet be granted. It also appears that Erasmus + has been very much geared towards the needs of academic education. For many training providers in VET (including companies offering apprenticeship training) the current programme does not meet the needs of many training providers, especially employers, and it is too bureaucratic.

UEAPME does not see the need to introduce longer term mobility for apprentices in VET. One the one hand also short term mobility phases have proven added-value for learners in VET. On the other hand there are still **many practical obstacles to overcome before long term mobility can be introduced.** An important concern is that in dual learning systems and work-based learning where large parts take place in a company (especially apprenticeship training), the owner of a company needs to be on board. Company owners, particularly in SMEs and even more in micro-companies, often cannot afford to have the apprentice out of the company for several months. They simply need them, which is the main reason that 75% of VET mobility in 2014 took place for shorter than one month. For most companies, not being able to retain the person after the mobility period is an additional risk. Furthermore, as the dual learning system is based on a work contract, companies still bear the legal responsibility, but also continue to pay for the remuneration and social security contributions of the mobile VET students. These are major obstacles that need to be addressed.

⁵ See further UEAPME's Euroapprenticeship project www.euroapprenticeship.eu

More learning at the workplace

UEAPME welcomes the intended support for learning environments at work and enable SMEs in particular to provide training. UEAPME welcomes the Commission's efforts to explore possibilities of further supporting **bank loans at favourable rates to SMEs with a specific financial instrument for skills**. Pooling resources and infrastructure for joint training is indeed one feasible solution. In general, UEAPME wishes to point out that **capacity building of (SME) business organisations** needs to be addressed as well to make this work.

Supporting teachers and trainers

Teachers and trainers have an important role to play, in encouraging young people to explore and in sharing their knowledge on different professions. UEAPME strongly supports efforts to enable teachers and trainers to acquire new skills, adapt to new tools and information channels, and introduce new teaching and learning methods. A strong push for up-skilling teachers is needed. Teachers should receive continuous training in order to be able to support the digital transformation and as much as possible to steer it.

Modernising higher education

Skills and competencies developed through tertiary level programmes are important drivers of productivity, innovation and new entrepreneurship for Europe. Reaching higher and more relevant skills requires that higher education is modernised throughout the EU. Part of this is ensuring that programmes delivered by Higher Education Institutes at tertiary level deliver the skills and qualifications that are relevant for the people acquiring them, for the labour market as well as their further life.

UEAPME supports in particular the development and promotion of **“Higher VET”**, meaning VET at upper secondary or advanced (including tertiary) level. In addition, work-based learning elements should be brought in higher education to deliver the advanced skills that will be increasingly needed.

UEAPME strongly supports efforts to **deepen the role of the Higher Education Institutes as key contributors in development and innovation both at regional and European or global level**. Higher education policies in many countries lack an explicit regional dimension and incentives to **promote regional development, entrepreneurship and innovation**. UEAPME believes that a strategic approach is essential to promote entrepreneurship and to deepen the cooperation between potential SMEs and HEIs at regional level.

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