



# CONSTRUCTION FORUM

## **UEAPME Construction Forum<sup>1</sup> position on the Commission consultation 'Towards a European Qualifications Framework for Lifelong learning'**

### **Introduction:**

#### **General appreciation**

The UEAPME Construction Forum welcomes this Commission initiative and agrees with the general principles for such a European Qualifications Framework. There is also agreement with the voluntary character of this tool.

#### **Focus on learning outcomes**

The UEAPME Construction Forum has always supported the inclusion of informal and non-formal learning in the definition of learning outcomes. Due to their small size, SMEs in construction are often unable to send their employees to external training / qualification courses. With a view to keeping pace with the introduction of new technologies, training activities mostly take place on the job. Their validation could contribute to increasing the attractiveness of construction trades for young people.

#### **Meta-Framework**

As stated in the UEAPME position, the meta-framework should be the right approach for relating national qualifications and national qualification frameworks, where they exist, better with each other. However, the decision if, when and how, to develop a National Qualifications Framework (NQF), has to be left to the national level. If a NQF is established, the cultural specificities have to be taken into account when relating it to the EQF.

#### **EQF versus EU legislation**

The UEAPME Construction Forum regrets the fact that this initiative is completely detached from existing and forthcoming legislation relating to the free movement of services and persons. This would have facilitated the practical introduction and use and contributed to administrative simplification efforts.

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<sup>1</sup> The UEAPME Construction Forum is a specialised discussion platform representing the interests about 1,000,000 construction enterprises across the European Union and beyond. The overwhelming majority of these enterprises are small or medium-sized. It is formed by the following associations: Comité européen des équipements techniques du bâtiment (Génie Climatique International - Union internationale de la Couverture et de la Plomberie), European Builders Confederation, European Metal Union, European Federation of Chimney Sweeps, European window, curtain wall and door manufacturers, European Federation of Timber Construction, International Association of Building Service Contractors, International Association of Roofing Contractors, Union Internationale des Entrepreneurs de Peinture

The innovative EQF approach should have been included in the directive on the Recognition of professional qualifications instead of keeping a system, which dates from the late 1960s.

Also the directive on Services in the Internal Market should include a clear reference to EQF and encourage stakeholders to apply the system to service professions. The lack of transparency between national qualifications was one of the main concerns of small construction enterprises relating to this directive.

### **EQF and construction**

Construction is the largest industrial sector in the EU contributing almost 10 % to GDP. At the same time, it is highly labour-intensive. Hence, charges on human capital, including qualification requirements, have a stronger effect on price levels than in other industries.

Although relatively small in percentage points, cross border activities in construction have become an important economic factor in certain regions and, for the above-mentioned reasons, do not meet with much enthusiasm in countries with high requirements. Applying the EQF to construction could certainly help overcome a part of this problem by increasing transparency and allowing comparisons.

However, the task would be tremendous. What is called “construction industry” consists of more than 100 trades and professions including

- developers
- designers (architects, engineers)
- suppliers of construction materials and equipment
- contractors (tile fixers, plumbers etc.)

It therefore appears to start with those construction trades, which are most willing to develop sectoral EQF. The UEAPME Construction Forum is prepared to provide the necessary contacts.

### **Comments relating to questions in the paper:**

<b>Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?</b>
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Yes.

<b>What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?</b>
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The following criteria should be met:

- Support of national decision makers (authorities, social partners);
- Development of NQF in a significant number of Member States and linking them to the EQF;
- Linking the EQF to Recognition of professional qualifications Directive and introducing a reference to the Directive on services in the Internal Market;
- Demonstrating that the EQF facilitates the mobility of individuals while guaranteeing certain minimum quality levels.

**Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?**

While one could always argue while the EQF does not include nine or ten levels, the 8-level reference structure seems acceptable and it should be possible to refer the various construction trades to it in a satisfactory manner.

Again, it should be emphasized that the UEAPME Construction Forum would have preferred a system compatible with the recognition of professional qualifications directive.

In order to have a better integration of higher education and VET and learning outcomes, a revision of levels content could help avoiding that the highest levels refer back to the academic system, since the current highest levels (levels 6, 7 and 8) seem to be taken to a too great extent from the Bologna process.

For the UEAPME Construction Forum, the highest level, whatever the number is, should correspond to the level of excellence in any given trade / profession, be it baker or engineer, without any reference to learning duration or type of learning. Even if their education and training pathways are different in terms of content and duration, it should be possible for both to attain the upper level with the relevant education and training and work experience.

In order to be fully consistent with the learning outcomes approach, the logic should be based on professions and work organisation and not on the results of an academic input-orientated system.

Moreover, the eight levels should provide further flexibility, so that it should be possible for the same person to have some competences, skills and knowledge from different levels, (for example some knowledge from level 3 and competences from level 4).

**Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?**

The concepts of knowledge, skills and competences are closely interlinked and seem difficult to be divided into three different concepts. Nevertheless, the UEAPME Construction Forum can understand the necessity to have that artificial separation of the descriptors in table 1 for analytical reasons and in order to have clarity for national bodies.

Furthermore, the UEAPME Construction Forum considers that the Commission should partly re-evaluate the language and content used for the level descriptors. In order to reach the objectives of the EQF, the descriptors should better reflect the reality of working life and workplaces, which is currently not the case. The formulation of descriptors should use a more neutral terminology like the one used for the knowledge descriptor in level 7 “create a researched-based diagnosis to problems by integrating knowledge from new or interdisciplinary fields etc...” It refers once again too much to academic practices and not enough to the world of work.

The validation process of non-formal and informal learning will certainly require the involvement of small business owners to certify certain skills / competences acquired on the job by their employees. There are doubts whether a small business owner would have the

time and patience to understand this highly complex table. A simplification is therefore indispensable.

**What should be the content and role of the ‘supporting and indicative information’ on education, training and learning structures and input (table 2)?**

Table 2 does not offer any added value. Rather it further complicates the understanding of the whole system. Furthermore, it is in contradiction to table 1. While table 1 focuses on learning outcomes, table 2 re-introduces the reference to formal training systems (learning inputs) and, thus, falls back into the “old” thinking it wanted to overcome.

The UEAPME Construction Forum therefore recommends that table 2 be replaced by a practical tool with some concrete examples mainly dedicated to the national qualification authorities which better explains the logic of learning outcomes. Given its economic importance, construction should be part of this exercise.

**How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?**

No comment.

**How can a National Qualification Framework for lifelong learning be developed in your country – reflecting the principles of the EQF-be established?**

No comment.

**How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?**

No comment.

**To which extent can the EQF become a catalyst for developments at sector level?**

Ideally, the NQF should be flexible enough to be linked to SQF if the sectors wish so, while the EQF should be flexible enough to be able to be linked to any kind of qualification framework, be it national and/or sectoral. A significant problem is that the EQF is looking at learning outcomes, while many national qualification systems and/or NQFs are based on learning expectations (input orientated: what somebody should know). Therefore, Member States should be encouraged to adapt their national qualification systems to learning outcomes based, and when designing a NQF to take learning outcomes as the point of departure. Diplomas cannot be anymore the only starting point, but non-formal and informal learning need to be full part of the lifelong learning system.

Furthermore, we consider that a SQF should primarily be integrated into a National Qualifications Framework in order to ensure more consistency in each country.

**How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?**

Increased transparency will allow stakeholders to compare national qualifications with those in other countries. This could lead to some sort of upwards pressure stimulating reform and innovation in national VET systems with a view to improving the country's "ranking" in specific trades / professions.

**How can stakeholders at sector level be involved in supporting the implementation of the EQF?**

According to section 8.3. of the Commission paper, a link should be established between sectoral frameworks and the EQF. Whilst the UEAPME Construction Forum can accept the principle, a number of questions remain open as to the practical implementation.

- A number of joint training modules / qualification requirements have been developed thanks to the LEONARDO programme. Most of the project results have never been applied in practice, as they did not include national decision makers in charge of defining training programmes (governments, trade unions etc.). This must be avoided in the future.
- The construction industry is extremely fragmented. If it is envisaged to establish an EQF as a common reference point for the construction industry, all relevant stakeholders must be invited and consulted.

The European social dialogue for the construction industry does obviously not offer a right platform for such an endeavor. It does, for example, exclude the European Builders Confederation representing small construction enterprises. Furthermore, technical contractors (electrical, heating, plumbing contractors) often deal with metal workers' or other specific trade unions, which are also not involved in the European social dialogue of the construction industry. In other words, the system can only work, if the vast majority of social partners involved in national agreements, are also represented at EU level through their European organisations.

**How can the link between sectors development and national qualifications be improved?**

This is clearly the key issue for the success of the whole system of EGF, NQF and sectoral frameworks. It requires a close co-operation between sectoral and cross-sectoral employers' associations and trade unions as well as training centres and governments.

**How can the EQF contribute to the development of mutual trust (e.g. based on common principles for quality assurance) between stakeholders involved in lifelong learning-at European, national, sectoral and local levels?**

Critical voices may argue that national authorities (and other stakeholders), concerned about their country's reputation, may be tempted to link a given qualification to a higher EQF level than actually justified by learning outcomes.

The ongoing European quality assurance approach (i.e. CQAF) offers an interesting tool to avoid such a situation and develop mutual trust. In other words, as the assessment of learning outcomes is a crucial part of the quality assurance process, a common approach and full transparency are particularly important at this stage. The involvement of experts from other Member States in linking an NQF to the EQF is highly recommended.

**How can the EQF become a reference to improve the quality of all levels of lifelong learning?**

No comment.

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