



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
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UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME position on the proposal for a Recommendation by the European Commission on the “European Quality Assurance Reference Framework for Vocational Education and Training” (EQARF)

Introduction

Quality assurance, transparency and accountability of VET systems and providers are prerequisites for enhancing VET attractiveness, improving the image of VET and last but not least facilitating mobility within VET in Europe. Quality contributes more widely to increasing employability, as well as promoting access to lifelong learning in the education and training systems and on the labour market.

This is why UEAPME supports the new proposal for an European Quality Assurance Reference Framework for Vocational Education and Training (EQARF) building on the previous initiative on common principles and criteria under the Common Quality Assurance Framework CQAF¹. The need for more quality improvement within VET was recognised in the Helsinki Communiqué². Both the Lisbon Strategy and recent European Spring Council conclusions³ stress the need for more investment and improved quality of human resources.

I - General remarks

Based on the previous experience of the ECVET and EQF consultations, we strongly regret the lack of a thorough prior consultation of stakeholders and transparency in the EQARF proposal.

For UEAPME the main objective of EQARF should be to support and complement the ongoing improvement in quality of VET systems in Europe, notably the implementation of the European Qualifications Framework (EQF), but also ECVET, as well as the common European principles for the identification and validation of non-formal and informal learning.

UEAPME approves the voluntary use of EQARF which does not pose any legal obligations for implementation and does not have a regulatory mission.

UEAPME considers EQARF methodology as useful in that it takes into account different national approaches to improving quality and in particular through identifying best practice. At the same

¹ CQAF <http://ec.europa.eu/education/policies/2010/doc/qualitynet/cqaf.pdf>

² Helsinki Communiqué in 2006 on Enhanced European Cooperation in VET reviewed the priorities within the Copenhagen Process http://ec.europa.eu/education/policies/2010/doc/helsinkicom_en.pdf

³ http://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/ec/99410.pdf

time it is positive to have EQARF building on existing structures and provisions to minimise administrative burden.

EQARF should become an important tool to promote mutual trust within European networks, and consequently play a decisive role for improving mobility within Europe. In this respect it will complement the European Network on Quality Assurance in Vocational Education and Training (ENQA-VET) which provides a European platform and aims at sustainable cooperation covering different Member States within the network.

The implementation of the principles of quality assurance should clearly reflect the diversity of situations in the Member States. The discussions between the ENQA-VET network stakeholders should aim to define the best way to apply these common quality principles while respecting the specificities of the Member States and at the same time drawing on their particular strengths.

II - Specific UEAPME comments on the EQARF Recommendation

Compared to CQAF, the EQARF has evolved focussing now more on detail and being more specific regarding quality criteria, indicative descriptors and indicators supporting the implementation process. So far under the CQAF instrument it had been more difficult to generalise and make sound recommendations.

The Recommendation to devise a national approach for implementation by 2010 seems rather optimistic. The implementation of EQARF is an ongoing process along with the implementation of EQF and ECVET which will take time to be fully operational.

Monitoring, evaluation and measurement are critical components of quality systems. Self assessment should be considered as an important part of the bottom-up process.

The Quality Assurance National Reference Points (QANRP) should be designed to take into account the existing structures and respect the different national responsibilities of the various stakeholders.

Last but not least UEAPME calls for the social partners to be actively involved in the national approach for implementation of EQARF and at national and regional level in the QANRP.

III - Specific comments on the annex

Annex 1 – Quality criteria and indicative descriptors

There is a need for clarification regarding VET providers. According to the present CEDEFOP definition used, VET providers are “*Any organisation or individual providing training services. Comment: Training providers may be organisations specifically set up for this purpose, or they may be other, such as employers, who provide training as a part of their business activities. Training providers also include independent individuals who offer training services*”⁴.

⁴ Cedefop Glossary on Quality in Training, 2003

As presented in the Annex 1 the indicative descriptors at VET provider level are rather bold and therefore could create serious problems for smaller VET providers. Further work should be undertaken to consider the aspect of smaller VET providers more closely to avoid putting them at a disadvantage.

Annex 2 – A Reference set of quality indicators in VET

The need for and objective of improving quality assurance systems for VET providers has been clearly recognised. As stated in the proposal this has to encompass promoting a quality improvement culture, increased transparency of quality of training and improved mutual trust on training provisions.

Such indicators are too quantitative and do not sufficiently take into account the qualitative aspects. This annex deserves to be revised in the view of better fitting the efforts of Member States to improve the qualitative dimension.

On specific indicators, notably N° 6 on “utilisation of acquired skills at the workplace” and N° 9 on “mechanisms to identify training needs in the labour market” these are all very relevant to supporting employability of individuals and to improve the responsiveness of VET to changing demands in the labour market.

Conclusions

- o European craft, small and medium sized enterprises support the aims and objectives of EQARF to promote quality in VET.
- o However UEAPME strongly regrets the lack of prior consultation of stakeholders on EQARF. UEAPME strongly agrees with the voluntary nature of this initiative.
- o With respect to Annex 1 and the quality criteria and indicative descriptors, further work should be undertaken to consider smaller VET providers more closely to avoid putting them at a disadvantage.
- o Regarding Annex 2, although the objective of fostering quality criteria is highly useful, the indicators should present a better balance between the quantitative and qualitative dimension.
- o Early involvement of the social partners needs to be secured in the national approach for the implementation of EQARF and at national and regional levels in the Quality Assurance National Reference Points (QANRP).
- o EQARF is a long term project, therefore the implementation deadline by 2010 seems to be too optimistic. Further work on adapting and consolidating this instrument will be indispensable.

Brussels, 30 June 2008