

# Position Paper

## UEAPME<sup>1</sup> position on the EC Public Consultation a European Area of Skills and Qualifications

### Introduction

On 17 December 2013 the European Commission launched a public consultation on a “European Area of Skills and Qualifications” with the objective to increase the transparency and recognition of skills and qualifications of learners and workers when moving within and between Member States.

Against a background of high unemployment, especially of young people in Europe, education and training plays a key role in the economic recovery, competitiveness and for implementing the Europe 2020 Strategy.

### General Comments

#### On the aim and concept

UEAPME endorses the aim to gather the views of stakeholders on problems faced by learners and workers regarding the transparency and recognition of skills and qualifications, when moving within and between Member States for further learning or employment.

According to UEAPME the European Area for Skills and Qualifications should be primarily based on the existing EU transparency instruments developed in the context of the Copenhagen process, i.e. EQF, EQAVET and ECVET. Implementation of these instruments in Member States takes time. The EU should accompany this process by ensuring consistency, encourage exchange of good practices, as well as more coherence and adaptations of the tools where necessary. The EU and Member States ought to effectively communicate and disseminate these tools towards end-users.

UEAPME has serious reservations about the questionnaire in terms of methodology and representativeness. The outcomes should therefore be scrutinised in a very prudent manner.

UEAPME also wishes the requirements of employers to be more adequately considered, as SMEs and crafts rely on a well-qualified workforce, but face difficulties in finding workers with skills and competences to fit their business needs.

#### On the challenges

UEAPME broadly agrees on the main challenges, including the lack of mobility - geographical, sectoral and permeability between different educational systems, notably VET and higher education. Moreover, the skills mismatch, that is insufficient basic skills and need for more medium and higher skills, in addition to differences in learning outcomes and internationalisation.

The role of occupational mobility should be better highlighted for overcoming skills bottlenecks at sectoral and regional level, which at around 3% is still too low in Europe. In this respect learning mobility, which increases the likelihood of work-related mobility and enhances skills, should also be further promoted. Given the current lack of evidence on the magnitude of IVET learning mobility across the EU, we welcome Eurostat’s efforts to better measure the IVET benchmark, including for apprentices. This is crucial to advance on the EU benchmark of 6% IVET mobility by 2020.

<sup>1</sup> UEAPME subscribes to the EC’s Register of Interest Representatives and to the related code of conduct. Our ID number is [55820581197-35](#).

While recognising the potential of “Massive Open Online Courses” for higher education, we do not yet see “massive changes” impacting on higher education in Europe and even less for VET, as it relies for a large part on “learning by doing”. Nonetheless the role of digital learning needs to be further explored, in particular for CVET and in certain trades and sectors.

## **Specific comments**

### **I. On the survey**

#### On process

UEAPME has reservations about the process of this consultation and in particular the target group. It is addressed to all stakeholders whether citizens, social partners, governments, VET providers and other actors and relies on voluntary online replies. Yet some questions on policies and tools addressed are very complex and only for experts, but others are rather superficial inviting the general public. This has important implications for the weighting of the replies.

#### On content

We are concerned with certain qualitative and methodological weaknesses inherent in the survey. In some cases respondents are obliged to reply yes or no even if they may not have fully understood a question, which risks leading to results with limited value. In other cases respondents may either have no opinion, or know the question very well, but have no opinion because they do not consider the question as relevant.

In other instances the introductory text of the question is biased and already suggests a reply (Q 20 a), the question on the EU tools and sectoral skills alliances is premature since the tools are not fully implemented and/or fully fledged yet and the sectoral skills alliances have only been tested in pilot projects (Q. 12). Other questions are too specific to answer effectively even for an expert (Q 4) or too ambiguous and vague as the question triggers several subquestions on the exact meaning (Q 26 a).

### **II. UEAPME views on the content of the particular issues addressed in the consultation**

#### **1. How to place a stronger focus on higher and more relevant skills**

The skills mismatch has been exacerbated by the crisis. We currently face a paradox of high unemployment, but also 2 million job vacancies throughout the EU. At the same time there is a growing lack of basic skills, which is contrasted by a forecasted demand for more medium and higher skills in Europe.

According to UEAPME the emphasis should be on the acquisition of basic skills and of more relevant skills focusing on learning outcomes and employability according to company and labour market needs. It is paramount to better involve employers in the design of qualifications and curricula and the general VET governance. In this context apprenticeship and work-based learning have proven to be effective for smoothing transitions to the labour market. This is demonstrated in Member States with well-developed apprenticeship systems, as those also have the lowest youth unemployment.

Although UEAPME fully recognises the importance of higher skills gained in an academic context, in particular for Science, Technology, Engineering, Mathematics (STEM), where there is a considerable demand, higher skills and higher qualifications must not be automatically equated with higher education. Higher VET on levels 5 to 8 of the EQF plays a significant role in the adequate skills provision in companies.

In this context UEAPME deems the Education and Training 2020 benchmark on 40% of graduates at tertiary level as problematic since it refers to the International Standard Classification of Education (ISCED) which has a bias towards “academic” tertiary education and formal qualifications. It is necessary to deliberately look beyond ISCED and better include higher VET and specifically also so-called “non-formal qualifications” i.e. qualifications awarded outside of formal qualification systems.

If the EQF is successfully implemented it will be a more appropriate instrument than ISCED, provided that all Member States succeed to incorporate the full education and training landscape into their National Qualification Frameworks.

## **2. Further strengthening links between education/training, mobility and the labour market**

For UEAPME it is essential to foster the interaction between the world of education, training, mobility and the labour market. This requires an effective VET governance at system level with strong involvement of social partners and notably employers. The latter also need to be more consistently involved in the design of qualifications and curricula together with other practitioners.

Member States should have adequate structures and competent institutions in place to cooperate with and enhance skills matching according to labour market needs. In some cases these structures already exist and successfully strengthen the skills matching processes. In others more institutional development and capacity building may be necessary involving professional organisations including Chambers of Skilled Crafts and Chambers of Commerce.

This cooperation should also apply to public employment services. In Germany and Austria, social partners for example have a seat on the administrative board of public employment services.

Evaluation on skills supply and needs ought to be better integrated into the education and training strategy in order to reduce skills mismatches. This goes hand in hand with better skills anticipation, orientation and guidance to ensure informed decisions for companies, employees and individuals. In addition, skills observatories at regional or sectoral level can provide a useful input. Furthermore, concerning instruments and tools such as ESCO and skills passports the possible added value for the labour market is not proven yet.

## **3. Adapting to internationalisation trends**

Anticipating and adapting to internationalisation is crucial for skilled crafts and SMEs, in order to target new markets and for innovation purposes. In turn, international qualifications need to be better recognised, to make it easier for companies to recruit a suitably qualified workforce.

Concerning qualifications on an international level, e.g. be it from global ICT companies or sectoral organisations, it seems to be likely that the classification to the EQF levels might lead to different results in the National Qualification Frameworks. We therefore welcome the ongoing work at European level in the context of the EQF advisory group subgroup on international sectoral qualifications.

The EQF is a useful transparency instrument which gives a certain orientation about the “status” of a qualification within an educational system. It is also likely that the EQF will have positive effects on the mutual recognition of qualifications inside and outside the EU.

On the new technologies and new forms of learning due to internationalisation, UEAPME believes that they should be exploited in order to respond to companies’, workers and learners needs. Whilst seeing the potential of “MOOCs” for higher education, we do not yet detect “massive changes” impacting on higher education in Europe and even less for VET, as it relies more on “learning by doing”. Nonetheless the role of digital learning needs to be further explored, in particular for continuous VET and in certain trades and sectors, including how to recognise knowledge and skills acquired through digital content.

#### **4. Ensuring overall coherence of tools and policies and further implementing the learning outcomes approach**

UEAPME supports the learning outcomes approach as it sets out the content of qualifications according to competences rather than input. Employers, workers and individuals need to have trust in learning outcomes. It should therefore be accompanied by measures that evaluate the factual achievement of learning outcomes set out for a specific programme by for instance monitoring the labour market performance of graduates and thus improve the accountability.

UEAPME has been strongly engaged in the design and setting-up of the European transparency instruments and is still very active in their assessment and follow-up and our views on the current state of play are expressed in our various positions<sup>2</sup>. The implementation of the European transparency and recognition tools is an ongoing process and the current evaluation reports will hopefully give evidence on a possible adjustment and simplification of those instruments and increased coherence.

Based on the learning outcomes approach, EQF is one of the most important tools to foster transparency of qualifications and learner's mobility. Members of UEAPME are active in the design, implementation and evaluation of NQFs in their respective countries. Notwithstanding, it is also facing challenges due to some serious inconsistencies concerning different EQF levels with regard to the same or similar qualifications in Europe. The Commission should thus ensure systematic cross-checks on specific similar qualifications in order to identify discrepancies between countries and to allow for possible adjustments in the respective NQFs.

#### **5. Ensuring clarity of rules and procedures for the recognition of skills and qualifications for further learning**

As UEAPME we do not consider it useful to develop "common criteria and procedures for recognition" that could apply to all education and training sub-systems. In addition, due to the huge variety of skills and qualifications there is also the question of feasibility.

UEAPME points to the key responsibility of Member States in line with subsidiarity to find adequate solutions in terms of clarifying the rules and procedures for the recognition of skills and qualifications for further learning.

In this context it is important to take into account the Council Recommendation on the recognition and validation of non-formal and informal learning, which is to be implemented by Member States until 2018. Implementation has to fully involve social partners and avoid any undue burdens and additional costs for SMEs and crafts companies. Moreover, Member States should provide effective information and guidance on the rules and procedures to all stakeholders and in particular to the end user.

#### **6. Increasing the focus on quality assurance**

Quality assurance in VET and higher education is an important matter both for learners and employers and as such an important topic of UEAPME and its member organisations.

However, UEAPME considers that it is too early to develop a core of "European quality assurance principles" applied across Member States to all sectors of education and training. Instead quality assurance in VET needs to be adapted to the specificities of work-based learning in companies and implemented in a userfriendly and cost-effective way in line with EQAVET.

In UEAPME's view the EQAVET employability indicators No. 5 and 6, that is the placement in VET programmes and utilisation of acquired skills in the workplace are particularly 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.

<sup>2</sup> [http://www.ueapme.com/IMG/pdf/UEAPME\\_Position\\_Paper\\_on\\_the\\_current\\_implementation\\_of\\_the\\_European\\_tools\\_EQAVET\\_EQF\\_ECVET.pdf](http://www.ueapme.com/IMG/pdf/UEAPME_Position_Paper_on_the_current_implementation_of_the_European_tools_EQAVET_EQF_ECVET.pdf)

## **7. Providing learners and workers with a single access point to obtain information and services supporting a European area of skills and qualifications.**

UEAPME sees the need for improvements in the current vast landscape of web-tools in the area of skills and qualifications, which are neither sufficiently user-friendly nor comprehensible. This includes e.g. Europass Portal, Your Europe, Study in Europe, We mean Business, Ploteus, EQF Portal, European Skills Panorama.

We thus fully endorse a more integrated approach in the form of a “one-stop shop” to combine EU information and guidance available for learners and workers, as well as experts involved in orientation and guidance systems. It should cover both the education and training and employment dimensions, including the recognition of qualifications, and facilitate upgrading of skills in a lifelong learning context and ultimately better match supply and demand.

To this end, closer coordination between DG Education and DG Employment at EU level is desirable on the various instruments and in particular in relation to cross-border mobility in EURES. Finally, it is necessary to better communicate EU funding opportunities for learning and occupational mobility mainly under Erasmus+ and the ESF.

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