

Joint ETUC-ETUCE answers to public consultation on a European Area of Skills and Qualifications

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The following responses to the open questions of the public consultation of the European Commission are supplementary to the *Joint ETUC-ETUCE position to public consultation on a European Area of Skills and Qualifications*.

What has been the effectiveness and value of the European Key Competences Framework (European Reference Framework's 8 key competences) so far in promoting the competences that it refers to?

- We believe that this question is not appropriate, because the objective of the 8 key competences of the European Reference Framework is to describe the key competences, which should be promoted by different actors. Especially the trade unions have been promoting the key competences and learning outcomes approach, because it contributes essentially to the recognition, transparency and validation of learning, thus to higher rate of higher education attainment and employment. We believe that all students, workers, teachers, trainers and employers should be aware of the 8 key competences and the need of their continuous improvement. Teachers should be able to help the students and adult learners to describe their skills, competences and learning, for example by the Europass instruments. The objective should be how to facilitate the recognition of the studies, let it be formal or informal, non-formal learning. While the trade unions have been doing their best to promote the approach of key competences and learning outcomes, we strongly believe that there should be more cooperation at national and European levels to achieve these goals. There should be more trainings and dissemination events provided to the actors of the schools and work places on key competences, on the importance of lifelong learning and continuous up-skilling. European and national level meetings should be organised to achieve these goals.
- We observe nowadays a political shift on the interpretation of the 8 key competences comparing to their original description in the European Reference Framework in 2008. We would like to highlight that we support of teaching "entrepreneurship spirit" at all levels of education in the sense of improving the learner to be initiative, team worker and creative. At the same time "entrepreneurship education" as to teach how to create businesses are indeed relevant and should be introduced for VET, secondary schools and higher education. In the time of the financial and economic crisis, it is essential to teach the students how to create a business for themselves, mainly in the remote areas where industries and companies cannot provide apprenticeship and/ or employment places to the students/graduates. We believe that the European Commission should focus on this in high-level meetings (DG Schools, DG HE, DGVT, ACVT), the Cedefop should map out existing examples on teaching entrepreneurship in such a sense. Furthermore, the funds should be provided to the actors, such as governments and social partners to develop CPD for teachers and trainers on "start-a-business" subject.

- In order to achieve better education and training outcomes via quality teaching of the key principles, appropriate sustainable investment in education and training is essential. The economic and financial crisis, which hit education budget strongly, should not affect quality education and training on the 8 key competences. There should be funds/meetings/events provided at national and European levels to focus on education to keep the society cohesive, and to fight against increasing extremity. While the implementation of teaching key competences has been taking for long time, it has certainly provoked some changes at national level in the way of designing curricula or planning lessons, but an effective implementation has yet to come in many countries. For instance teachers and trainers, trade unions and employers should know more about the 8 key competences and their developments via the levels of education and training.

Could any European initiatives, other than the European Key Competences Framework, be more effective? If yes, which one(s)?

- For promotion: providing trainings to teachers, trainers, students, unemployed people on Europass. Europass and EQF are the best instruments for promotion.
- The question does not show what it should be effective for. We believe that they should be effective to describe learning outcomes. The framework for key competences would be more effective if it was integrated into the full range of education and training activities throughout lifelong learning, in a way that is appropriate for specific national contexts.
- The effective steps should be done to support teachers' competence development, to update assessment methods, and to introduce new ways of organising learning. Proper investment is needed for this.
- There should be monitoring processes on implementation of teaching of the 8 key competences, involving all the stakeholders, not just the governments.
- ESCO also helps to identify skills and competences but it also categorises qualifications and occupations in a standard way, using standard terminology in all EU languages and an open format that can be used by third parties' software. The 8 key competences should contribute to ESCO.
- The European countries do not value the same competences in the same way. It is necessary to improve and to make progress to this extent.

How can guidance services be organised to best support learners and workers in their educational, training and occupational choices and facilitate their participation in the labour market?

- Participation in the labour market should begin with improving employment possibilities. It is important that each citizen (workers, unemployed and students, teachers and trainers) have the right on high quality guidance service. For students carrier guidance has to be part of their education in school and in work-based learning. For workers and unemployed people, the government and the social partners are responsible for carrier guidance and the quality of the guidance. The carrier guidance has to be independent.
- Companies, employers organisations and trade unions should have active role in provision of guidance service, and via this to overcome the mismatches between the requirements of the companies and the knowledge skills and competences education and training can provide.

- Examples of effective guidance services should be shared among Member states. European, not only national, databases and up-to-date information about skills and qualifications needed in the European countries are of course another essential tool for effective guidance (like European Skills Panorama or ESCO). However, these two tools should be widely used and be available for all.
- Quality of guidance is essential. Guidance professionals should be helping students in a broader context (to overcome learning difficulties, become more motivated and etc.) than providing carrier and further education guidance. They should also help people to use Europass tools and should help people to describe their skills, knowledge and competences.
- It would be useful to open a dialogue at European level to agree on the common (international) quality requirements to the work of educational and career guidance providers/professionals (at national level), in order to meet the needs and demands of people in the educational system and the labour market. Related to this it is essential to include trade unions in discussions, design and implementation of teaching standardisation in schools, especially VET schools. Trade unions' involvement in up-skilling teachers and trainers on career guidance of the students, on standardisation, use of ICT, teaching entrepreneurship, etc. is essential.

What new features should initiatives such as EQF, ESCO, European Skills Panorama and the sector skills alliances include in order to raise the understanding of skills needs and on the communication between education and the labour market?

- All employers and higher education providers should understand the meaning of the diploma of a job seeker or a learner during job / further education application. This can be achieved by using an extended way of Europass, which not only describes the skills and competences, but also detailed learning outcomes, it mentions EQF and NQF levels, the level of quality (via maybe a quality assurance label, EQAVET label) of the school, credit points (where it is available), etc. It is necessary to build up trust between the education sectors (from general education to VET, and from VET to higher education) and between education and labour market.
- All certificates and diplomas should mention the EQF levels and describe learning outcomes so that employers can better understand the diploma and the competences, skills and knowledge of the job applicant. It should facilitate the international learning and occupational mobility of students/workers. We believe that development of describing the national education levels via the EQF levels are going well with the help of the active work and practical approach of the European Commission in the EQF Advisory Group.
- Students, teachers and trainers, trade unions and employers should know about and NQF/EQF levels, which can contribute to its recognition in the education and employment sectors. Specific in-service training campaigns for teachers should be set up in order to promote and raise greater attention about these topics.
- The communication between education and the labour market is possible only if social partners are involved into EQF, ESCO, European Skills Panorama and the sector skills alliances initiatives. However, this is not a case in many countries (especially in CEE countries). More social partners should be involved in the design and implementation of EQF both at European and national levels.
- Unfortunately, at the national levels EQF/NQF is seen as some European rather than national value. It is not clear for many teachers and trainers how they should use it in order to facilitate teaching and to improve knowledge that all pupils

needed to acquire in order to successfully master the various learning demands presented throughout one's life course.

- It is also essential to focus not only on the recognition and mapping out the students' and workers' competence, but also on the assessment of the jobs and skills that companies need in the short/medium/long term. In this respect we should see how the quoted tools, and especially those linked to skills' mapping, could contribute to such an assessment, which is essential for skills/labour market needs matching. Forecasting of the jobs and skills is essential for the labour market, but it should be analysed to what extent the job and skills forecast met later on with the reality. Some national cases has already proved (Germany, US), that forecasting does not work in most of the sectors, since for example in the US during a 5-year period 50% new unforeseen jobs were created.
- Skills matching in the labour market should be implemented on the ground, by involving companies and workers representatives in the workplaces, and social partners in the sectors and in the local dimension.

If you think that better integration between sectoral passports and the Europass framework is needed, please give your suggestions on how it could be achieved.

- We believe that Europass includes too many instruments. Simplification and merger is necessary. So far only Europass CV and Diploma Supplements are the Europass tools which achieved the greatest success in Europe by helping people to get to employment and further education. However, not all students can receive the Diploma Supplement as the institutes are not obliged to fill it in.
- There should not be difference between the Certificate Supplement and the Diploma Supplement.
- Europass should be revised and its tools should be more accessible for the public, especially for those who have difficulty describing their skills. It should support the most vulnerable groups. In addition, many teachers and trainers are not aware of this tool so it is more appropriate to develop the promotion of Europass.
- Additionally, education in general and the guidance services should help people to describe their skills, knowledge and competences. This is essential for all graduates and adult learners.
- There is a need for consultation with social partners at European and national levels on implementing and disseminating the sectoral skills passport system. It should be carefully managed to ensure that benefits are realised by individuals and employers. Governments should support and improve funding in the establishment and maintenance of a sectoral skills passport system.
- The structure of the sectoral certifications and concepts shows diversity both between countries and within a country. Some designs are hardly compatible with the European framework. Sectoral social partners should get support to define requirements in every qualification, and this should be legislated. The regulations in all countries must be respected in cases of existing harmonised requirements for professions at the European level.

What further steps could be taken at EU level to promote mutual recognition of qualifications, credits or learning outcomes between the EU and third countries? Could the EQF be useful in this context? If yes, how?

- Since the Recognition of Qualifications Directive (2005/36/EC) does not apply to non-EU workers, EQF should definitely contribute to easier recognition of

the certificates of 3rd country workers immigrating to the EU, in case his/her country also describes the education systems according to NQF levels, and the NQF level is mentioned in the certificate.

- The mutual recognition may be improved with a better system for recognition of non-formal and informal learning. NFIL recognition systems and pathways should intervene also in cases in which the formal education outcomes acquired in the country of origin are not comparable to the EQF standards. Recognition of skills and qualifications should go through a recognition level of remuneration in the workplace, which also encourages the promotion level of qualification. While we fully appreciate the work of the ETF on promoting the need of design NQFs in non-EU countries, it is necessary to make more efforts to adapt skills and competences of third country nationals to the EQF/NQF requirements, in order to recognise them more quickly and effectively. In this respect the NFIL recognition pathways could be a useful reference.
- EQF/NQF should also help to describe levels and learning outcomes of non-formal and informal learning. The complexity and diversity of national frameworks that refer to the EQF are not in a state of nature to create an automatic mutual recognition.

What further steps could be taken at EU level to promote the recognition of joint degrees offered by European higher education institutions in cooperation with institutions from other parts of the world?

- As long as the implementation of EQF takes place at a different pace in the member states, it is difficult to rely on it for such a goal. In addition, the labour market dynamics are not the same in each country and this makes the process even more awkward.
- Better cooperation and agreements between EU and other countries should help. If we get a coordinate system of qualification, and only when we have it in all Europe, we can move forward the rest of the world. To achieve this, as we suggested it above, there should be built a common governance structure for the Bologna and Copenhagen process, including dealing with recognition of qualifications, transparency, quality assurance of other sectors.

What are, in your opinion, the obstacles of basing both curricula design and assessment practices on a learning outcomes approach?

- Learning outcomes should identify what a learner knows, understands and is able to do. When teaching design starts from a foundation of learning outcomes, it is easier to focus on how students will apply what they learn, and it takes into account that learning is about skills as well as knowledge.
- Some trade unions do not agree to make curricula design and assessment practices on a learning outcomes approach as there is no adequate evaluation of these processes and this could cause in an adverse effect and induce the teaching to the test. There is a difficulty in controlling the logic of learning outcomes by a large number of certifiers and there is a complexity and diversity of national frameworks.
- There is no direct link between discipline contents and learning outcomes as the latter depending also on the individual. Curricula can be designed for an ideal student, but then it is necessary to be adjusted to each student's needs. Assessment practices often do not take into account these variables.
- Improved cooperation with the social partners would contribute to

overcoming the obstacles in curriculum design. Curriculum relevance should be strengthened through closer cooperation between VET institutions and industrial social partners, which have to play an important role in curriculum design and learners' assessment. National trade unions have sometimes problems to certify workers' competences to go on with their job because of national regulations.

What actions are needed at EU level to enhance the synergies between the European Qualification Framework and the Qualification Framework for the European Higher Education Area and to build a common reference for all qualifications levels for all participating countries? Should the adoption by all countries of a single referencing process combining EQF referencing and QF-EHEA self-certification be promoted?

- Again, it is high time to focus on all educational sectors, and to make a common governance structure on the tools and developments at EU level related to all educational sector. The tools should not be set up for different educational sectors, for instance there should not be two separate systems for quality assurance on VET (EQAVET) and higher education (QH-EHEA), but an overarching quality assurance framework to be used in all education and training settings. It would be useful to build such a common reference, in order to make it easier the transition from upper secondary school to higher education.
- To achieve this, it is essential to revise the governance structure on the EU tools and on the Bologna Follow-Up Group. The two should be closed linked.
- It is essential that the tools should help to improve the systems but should not request continuous reforms from the education systems.
- General awareness raising campaign is essential towards the general public and specifically social partners regarding the development of abovementioned initiatives and to improve the dialogue between HE and VET areas.
- We need a single referencing process in order to all countries recognise similar competences.

Do you have any further suggestions for simplifying and for improving the coherence of the European transparency and recognition tools?

- There should be an overall European and national governance structure for all tools, similar to the Bologna Follow-Up group. It is necessary to think about all education sectors in a constructive way.
- There should be an overarching coordination of all these tools at EU level which could serve as a central management, providing permeability between the tools, and could introduce the changing trends and policies at European and national levels into the discussions.
- Departments dealing with discussions on the tools seemingly hardly liaise with each other or with other related directorates-generals of the Commission, such as DG Employment and DG MARKT. For instance, the Recognition of Professional Qualification Directive (2005/36/EC) could be easily implemented with the help of EQF, ECVET, EQAVET. Existing tools in the fields of skills and labour market managed by different DGs should be better coordinated.
- Different national agencies are dealing with these tools and there is a lack of cooperation between them. Also, we believe that the same national experts should be members of several groups on the different tools to facilitate transition on the work among these groups.

- At political level there should be flexibility: a policy recommendation on the EASQ should allow flexible restructuring of the tools. The aim should be: 1. Quality education and 2. Employability.
- The continuing difficulties surrounding the tools prove that the social partners were not fully involved (or even not at all) in the design and the start of the implementation of the related European policies and instruments (at both EU and national levels). We would like to highlight that primarily social partners are able to build a stronger link between education and the labour market and improve such recognition and transparency. There is a lack of national level social dialogue on these tools. Most of the National Agencies, National Contact Points, and Departments of the Ministries dealing with these tools do not allow dialogue with the social partners on the tools and instruments.
- There is a need of promoting stronger coherence between different EU and national transparency and recognition tools. The Commission should stop producing new tools and it should concentrate only on improvement/merging/simplifying the existing ones.
- Concerning ECVET, in the European Union vocational training and certification has a very wide range of purpose. If the objective set by the European Commission is to increase the mobility of people in Europe, it is clear that multiple tools make transparency more difficult and that the majority of people potentially stakeholders (teachers, trainers, workers and employers) will have little or no knowledge on these.
- ECVET is understood and used from different approaches for different purposes at the national level: either for internal or external mobility, or for introducing credit systems to try to find permeability to higher education, or to describe learning outcomes. Either way, the principle and use of this instrument should be revised.
- Trust between the education and training systems is crucial to the success of the tools. This can only be built on the mutual recognition of quality systems on training and certification and evaluation methods of learning. It should further define the common quality assurance standards to systems of greater transparency and visibility.
- Some tools should be definitely merged with others after careful evaluation and discussion on a way of merger. For example overlapping between ECVET and EQAVET, EQAVET and QA for higher education should be subject of discussions.

The European Commission should make steps:

1. to speed up the European level discussions with the participation of the social partners and start the implementation process of the useful tools, and launch the European Area of Skills and Qualifications as an approach to serve the direct and immediate needs of students, workers, and unemployed people;
2. to urge governments to involve national social partners in all levels of the design and implementation of these tools;
3. to increase the participation of the social partners at European level events on the tools, which would also serve as a dissemination process.

Which measures, if any, should be taken at the EU level to improve the recognition of learning outcomes related to new forms of learning such as learning through Massive Open Online Courses (MOOCs)?

- With MOOCs there are basic problems concerning the quality, quality assessment, recognition, certification, data safety, no live broadcast of the trainings, no direct contact with the teachers, no strict assessment (no control and there is possibility to cheat). Until these issues are solved, we should not speak about learning outcomes and quality recognition and certification of the MOOCs trainings.
- Only “strict” quality assurance principles and systems related to new forms of learning can build the basis for mutual trust and transparency, which would lead to such recognition.
- The recognition of new forms of study and online courses can only be done through diplomas and certifications preferably issued by the public service. This certification can be a diploma, title or certificate of qualification must be registered in the National Catalogue of Vocational Qualifications (NCPR). This is the condition for the recognition of real value but also the guarantee of quality assurance for all qualifications obtained in this context.
- To recognise learning outcomes achieved outside formal training or education paths, there should be a national agency in charge of assessing the correspondence of these learning outcomes with the ones achieved at school or in any formally recognised training institution.
- Where apprenticeship is not available and/or for workers already on job, online trainings should be developed to use them for workplace learning, where the final outcomes have to be assessed by the company and the trade union representatives. We would like to encourage the European Commission to include discussion on online learning, including MOOCs in general, development of Open Educational Resources into the discussions of the European level events with the ministries and the social partners.

What are your suggestions on what could be the common basic principles and guidelines for quality assurance applicable to all qualifications?

- Students should get high quality education and training on the basic skills needed for further education, fulfilment of their life, and working sector. Minimum standards should be set either by national governments. For example, in many countries the widest approach to quality assurance of providers is accreditation, however this evaluation process is done against predefined common standards. In many countries accreditation means only “surface control”: if facilities are in place, if there are enough teachers and equipment, while the learning process is not assessed at all... The basic principle is to have an assessment system controlled in a common way in all Europe.
- Quality assessment and evaluation should not be considered from the view of test results, but from different perspectives.
- A European-level quality assurance label (EQAVET-label) would help in the recognition of studies in adult learning and non-formal and informal learning.