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Consultation paper by DG Internal Market and Services on the Professional Qualifications Directive

Answer to the consultation from EUNEC, the European Network of Education Councils

1 What is EUNEC ?

EUNEC is the European Network of Education Councils in Europe, composed by stakeholders in education and sometimes professional training. As well as its members, the network is indirectly concerned by the consultation paper. It is not possible for EUNEC to answer to the questions of the consultation that are more directly linked to the employment market. However, EUNEC wants to express some general remarks because it is concerned about the link between qualifications and employment and deeply involved in a reflection on the theme of transparency of qualifications and mobility.

2 EUNEC reaction on the consultation on the Professional Qualifications Directive

In the field of education and vocational training a lot of progress has been made in improving the transparency of qualifications, both through the Bologna Process and the Copenhagen Process. Similar issues were lifted about the processes of recognition of skills acquired through experience in non-formal and informal settings. A central element of these processes is the shift to learning outcomes and the tools and principles using and linked to the learning outcomes approach:

- The European Qualifications Framework (EQF), linked to the Framework for Qualifications in the European Higher Education (FQ-EHEA);
- The credit systems (ECTS for Higher Education and ECVET for Vocational Education and Training);
- The validation of non formal and informal learning.

This approach focuses on output rather than on input. Transparency based on output is a useful principle which makes possible to compare different ways of learning, without referring to the input and the process. Thanks to transparency based on learning outcomes and linked tools the mobility of learners through different Education and Training providers and through different countries is becoming a reality.

The focus on the output rather than on the input is different, and not linked to the approach of the directive, exclusively based on input and processes, such as duration of study and contents.

Exclusive input approach can be a barrier to mobility of students, graduates and workers from different sectors. For example, it excludes the possibility of validation of non formal and informal learning. On the other hand, two qualifications with the same duration and content can lead to different levels of competences, to different levels of autonomy and responsibility and thus to different EQF levels. This way, the directive for regulated qualifications can sometimes be an obstacle to recognition and professional mobility or lead to recognition when objective differences are present.

However, EUNEC wants to stress the fact that the focus should not be exclusively on the outcome: process variables, such as educational time, duration of the study and the quality of the teacher or trainer have an important impact on the learning result. And, if the focus is on learning outcomes, this requires a clear definition of those outcomes, in order to be able to decide on its level.

Such a strategy should include the majority of regulated professions in order to make explicit the requirements and the standards of competences that are needed to become a professional in the EU.

As far as the validation of non formal and informal learning is concerned, EUNEC suggests to maximise the share of non formal and informal learning to 25% of the total amount of ECVET/ECTS points.

Transparency can also be useful for the general system. Defining learning outcomes and comparing these between two qualifications is a good way to objectify differences if they exist. It is a good way to define adapted compensation measures which can be useful based on tools and methods for validation of learning.

The principle sustaining ECVET, based on recognition of units of learning outcomes shared by providers in a mutual trust area, is a way to build progressively automatic recognition. This mutual trust is not based on constraints but on sharing practices and quality assurance principles.

For EUNEC it is important to consider the Education and Training reforms regarding the evaluation of the directive, and to see how they can simplify it.

Therefore the study commissioned to evaluate the Professional Qualifications Directive against recent educational reforms in the EU Member States is an interesting and important initiative.

A cooperation between DG Internal Market and Services and DG Education and Culture is essential to improve mobility of learners, of workers and to enhance the relevance of Education and Training for the Labour Market.