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EUNEC POSITION PAPER, a reaction to the stakeholder consultation on the European area of skills and qualifications.

EUNEC

EUNEC (www.eunec.eu) is the network of education councils in the European Union. EUNEC brings together the expertise of advisory bodies and of the stakeholders and experts who are involved in the national/regional advisory processes. These advisory bodies give advice to the governments of the different European countries in the field of education and training.

Context

Through this consultation[[1]](#footnote-1), the European Commission wishes to collect the views of stakeholders on the problems faced by learners and workers with regard to the transparency and recognition of their skills and qualifications when moving within and between EU Member States, on the adequacy of the related European policies and instruments, and on the potential benefits of developing a ‘European area of skills and qualifications’.

EUNEC as well as its members, is interested in the questions raised by the consultation paper. To this end EUNEC disseminated the consultation to the members of the network to be discussed in member councils and so raise awareness on the importance of the consultation.

It is not possible for EUNEC to formulate a common answer to all the questions of the consultation. However, EUNEC decided, in the preparation of the working programme 2014, to formulate a position paper on the main issues of the consultation, based on work done in seminars and conferences of the last years (Budapest, 2010; Lisbon, 2012).[[2]](#footnote-2)

Central question of the consultation

The central question of the consultation is: ‘Do the current policies and the existing transparency instruments offer sufficient transparency and recognition of skills and competences in EU Member States? What would be the benefits of a ‘European area of skills and qualifications’?

The consultation addresses in particular the following issues:

* How to place a stronger focus on higher and more relevant skills?
* Further strengthening links between education/training, mobility and labour market
* Adapting to internationalisation trends
* Ensuring overall coherence of rules and procedures for the recognition of skills and qualifications for further learning
* Increasing the focus on quality assurance
* Providing learners and workers with a single access point to obtain information and services supporting a European area of skills and qualifications

General reflections

This proposal for a ‘European area of skills and qualifications’ is to boost the mobility of learners and workers but from the perspective of EUNEC these proposals create opportunities to strengthen the ongoing innovation of education and training systems (use of key competences, learning outcomes, transparency of education and training qualifications, boost the recognition of informal and non formal learning). This offers a lot of opportunities for mobility in vocational education and training. In this sense, EUNEC welcomes the proposal, but it should not lead to a convergence of educational and training systems. Transparency is an added value, but uniformity is not the objective: according to the principle of subsidiarity, considerations at local, regional and national level remain decisive factors.

The existing European instruments are not sufficiently transparent for the users (the learners, the companies, the institutions). Transparency and efficiency have to be the key elements of an evaluation.

The existing procedures are too bureaucratic and not flexible enough.

Too many initiatives coming from different DG’s of the European Commission are not well coordinated. This is the case for the European Professional Qualifications Directive, which does not take into account the developments in the field of the European Qualifications Framework. This is a missed opportunity.

EUNEC reaction to the proposals of the European Commission

# How to place a stronger focus on higher and more relevant skills?

## Proposal

European education and training systems fall short in providing the right skills (literacy, numeracy, key competences in general (cfr. PISA and PIAAC)). In order to contribute more effectively to individuals’ employability, personal and social development and active citizenship, education and training systems should focus on delivering up-to-date and relevant knowledge, skills and competences.

To help Member States and educational institutions enhance the focus on learning outcomes, European reference frameworks could set out concrete levels of specific competences, starting with the ones in the European framework for key competences. The framework for language competences could serve as an example for this project[[3]](#footnote-3). Later on this could be extended to other relevant competences.

## EUNEC position

EUNEC recognizes the added value of the European Framework for key competences[[4]](#footnote-4). This framework has been innovative because of its focus on learning outcomes, its attention for diverse societal expectations and its interdisciplinary approach. The framework can also be a tool for communication between Member States and in Member States on the concept of general education (‘Bildung’) and, by doing this, enhance mobility.

However, there are also limitations; this framework cannot replace curriculum development and educational goals:

* EUNEC insists on the necessity of a translation of European frameworks into national educational goals that also take into account the national context, the different qualification strands within the national education and training systems and national common understanding. These goals are described in relation to different developmental needs, learning trajectories, educational and professional contexts. Setting out the level of learning outcomes for each level of a specific competence at a European level, even when aiming at enhanced mobility, does not offer an added value. It is also not clear why and to what extent the levels of competence described in the EQF are not sufficient for this purpose.
* From a conceptual and methodological point of view, it is extremely difficult to define mastery levels within the learning outcomes of transversal competences such as ‘learning to learn’ and ‘civic competences’. The operationalization of ‘civic competences’, for instance, can never be politically/ideologically neutral. Is it possible to discriminate between mastery levels that are relevant for the competence field as such, for all key competences ?
* Important dimensions, such as arts and the esthetics, history, the spiritual dimension are not present in the European framework.
* EUNEC states that an operationalization of European key competences cannot replace a societal debate on curriculum development in the different Member States.

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

## Proposal

Exchange of information between the world of education and training and the labour market requires a common language (on skills, knowledge and competences), a clear strategy on how to use information on skills supply and needs for near and medium-term future and a forum for exchange. Several tools with different stages of development address this challenge, but are not fully implemented.

The recently revised ‘Directive on professional qualifications’[[5]](#footnote-5) insures smooth recognition of qualifications in regulated professions. This Directive has introduced a ‘European Professional Card’. Next to this initiative, several sectoral skills and qualifications passports have developed. These passports are not coordinated with each other and with other existing transparency tools.

## EUNEC position

There is a proliferation of tools to share information on qualifications. It is necessary to streamline the initiatives, especially when the tools are used for guidance of individual learners.

Tools that have been developed through the sectoral social dialogue don’t have to be a priority for harmonization; they can perfectly play their role parallel to the European tools. It can be useful to establish links with the European tools in order to improve communication between sectors and between Member States. Coordination of initiatives taken by different DG’s of the European Commission is necessary.

# Adapting to internationalization trends

## Proposal

Student mobility has strongly increased. This phenomenon is especially visible in higher education. Recognition of types and levels of qualifications obtained outside Europe has become an important issue. There are possibilities to align the EU tools better with the transparency tools of third countries, such as ECTS and EQF outside of the EU.

The international dimension in Vocational Education and Training is a more complex issue, given the diversity of VET systems outside Europe. At the same time, the number of non-EU nationals with VET qualifications coming to Europe to work is increasing. Moreover, there is a growing impact of informal and non-formal learning.

The Commission looks for possibilities to make better use of the European tools such as EQF and credit systems, facilitating the recognition of qualifications between Europe and third countries.

## EUNEC position

EUNEC states that cooperation with third countries is important in two directions: for the recognition of skills and qualifications of EU citizens, and for the recognition of skills and qualifications of non EU citizens in the EU. It is however a priority to keep the communication lines within the European Commission very transparent.

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

## Proposal

The learning outcomes approach is a key common principle in European transparency and recognition tools. While this approach was embedded in the initial spirit of most instruments, putting into practice has been a challenge. Learners don’t have a clear view on the direct added value.

Different European tools such as ECTS and ECVET are not coherent. The Commission asks to explore how coherence between the existing systems can be enhanced.

## EUNEC position

For ECTS, it is important that the perspective is in line with ECVET. EUNEC refers to its statements of the conference in Madrid on learning outcomes (2008). This does not mean that both systems have to be integrated. Each tool has its own perspective and can contribute to enhanced mobility and employability.

The focus on measurable learning outcomes should not lead to a narrow approach of education. Variables related to input and to process are as important for the quality of education. Due to the principle of subsidiarity, they belong to the autonomy of the Member States.

# Ensuring clarity of rules

## Proposal

For higher education, the Lisbon Recognition Convention – supported by the network of national recognition centers (ENIC-NARICs[[6]](#footnote-6)) – supports the recognition practice in signatory countries. For general education, vocational education and training, or adult education, there is no European or international coordination or guidance regarding the recognition of qualification for further studies. Each Member State is applying its own rules.

The digital revolution offers opportunities for learning in other Member States, but this also raises new challenges for current tools for transparency and recognition.

The Commission asks to explore how to make recognition easier, with a view on further learning, in order to support mobility between education and training sub-systems within and across countries.

## EUNEC position

EUNEC states that a balanced judgment of the competences of a citizen is needed when considering procedures for the recognition of those competences. The judgment should never be an all-or-nothing verdict. Clear attention for recognition of prior learning is needed, in order to facilitate lifelong learning mobility. The burden of proof has to be with the host institution. The learner has to be at the center.

Regarding the European directives for the recognition of professional qualifications, this is not just a technical problem that can be solved thanks to transparency tools. The fact that a number of countries protect their labour market, is rather a political problem.

#  Increasing the focus on quality assurance

## Proposals

European quality assurance arrangements have been put in place in different contexts: ESG (Standards and Guidelines for Quality Assurance in the European Higher Education Area), EQAVET (European Quality Assurance in Vocational education and training), and EQF quality assurance principles. The principles of the three tools do not provide specific guidance for the quality assurance of the learning outcomes approach, qualifications and qualifications frameworks. Moreover, individuals move increasingly between systems and more and more learning opportunities no longer fit in conventional classification environments.

This may call for a common understanding of quality and a common set of basic principles. This can increase mutual trust across countries and different education sub-systems.

## EUNEC position

Quality insurance should not lead to less attention for aspects such as personality building. EUNEC states that there is a risk that non-measurable aspects are under pressure because of systems of quality insurance.

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

## Proposal

Various networks and websites have been created for the tools that are established for facilitating mobility. They deal with certain aspects of transparency and mobility, but none provides a complete overview of the information available in this area. For learners and workers, it is not easy to find information.

The Commission wants to investigate the possible advantages of the integration of these resources into a single access point for more user-friendly and visible services providing information on skills and qualifications recognition and transparency, mobility opportunities, apprenticeship opportunities.

## EUNEC position

EUNEC states that there are a number of critical conditions for the integration of different services:

* It is important to take into account the different perspectives of the users: learners, workers, future citizens, ..
* A local contact point remains necessary.
* Follow-up and updating are crucial.
* Mobility should not be limited to EU Member States. Often, questions are related to mobility as such and are not limited to the EU area.
* Need for clear agreements on the tasks: what is the role of the Member State, what is the role of the EU?
1. [Stakeholder consultation on a European area of skills and qualifications](http://ec.europa.eu/dgs/education_culture/more_info/consultations/documents/skills-back_en.pdf). The existing instruments are described in Annex 1 of the consultation document. [↑](#footnote-ref-1)
2. All EUNEC statements are available at www.eunec.eu [↑](#footnote-ref-2)
3. [Common European Framework of Reference for Languages: Learning, Teaching, Assessment (CEFR)](http://www.coe.int/t/dg4/linguistic/source/framework_en.pdf) [↑](#footnote-ref-3)
4. [Recommendation of the European Parliament and of the Council of 18 December 2006 on key competences for lifelong learning (2006/962/EC).](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006H0962&from=EN)  [↑](#footnote-ref-4)
5. [Directive 2005/36/ec](http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2005L0036:20110324:EN:PDF) of the european parliament and of the council of 7 September 2005 on the recognition of professional qualificationsand [EUNEC reaction](http://www.eunec.eu/sites/www.eunec.eu/files/attachment/files/doc_016_consultation_professional_qualifications_directive.pdf) [↑](#footnote-ref-5)
6. NARIC, National Academic (and professional) Recognition and Information Centre; ENIC, European Network of Information Centres. [↑](#footnote-ref-6)