



Opinion of the Umbrella Organisations of the German Business Community¹ on the European Commission's Staff Working Document «Towards a European Qualifications Framework for Lifelong Learning (8.7.2005)»

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Preamble

The umbrella organisations of the German business community welcome the continuation of the Copenhagen process and the development of a European Qualifications Framework. That is why they have been involved in its development in a constructive way. Agreement on an EQF and its success in Europe will largely depend on whether it is geared to the needs of business and industry and whether companies will benefit from it.

This will only be the case, if an EQF meets the following requirements:

- The **legibility** of competences acquired in different education and training systems must be really **improved** – unlike previous initiatives (e.g. ISCED, ISCO).
- The acquisition of **professional and vocational competence** must be adequately taken into account **at all levels** – i.e. all EQF levels must be accessible via different learning pathways (equivalence* of general education and vocational education and training).
- Its main function must be to develop a person's **capacity to act in a work setting** and his **employability**.
- The EQF' structure must be **stringent and complete, without any gaps** – in other words: it must focus on learning outcomes ("outcomes orientation") and Table 2 should be deleted.
- The EQF must be **easy to handle for its users** – i.e. descriptors that describe competences must be valid and easy to understand.
- Descriptors must be defined in such a way that they do **not contain restrictions for implementation at the national level**.
- The **holistic nature of qualifications** must be maintained and their atomisation should be discouraged. This means that the principle of certified qualifications in recognized training occupations (referred to as "Berufsprinzip"* or vocational principle in Germany) must be respected.
- A **shared understanding on terminology** is required – in our understanding, qualifications must be defined as a cluster of competences certified by a competent body and assessed in a holistic* examination.
- Its **voluntary character and mutual trust** must be the decisive criteria for designing and implementing a European Qualifications Framework.
- A **period of testing, evaluation, and revision** must precede the introduction of an EQF.

On this assumption, the umbrella organisations of the German business community participate in the consultation process on the EQF by answering the following catalogue of questions.

¹ Confederation of German Employers' Associations (BDA), Federation of German Industries (BDI), Federation of German Wholesale and Foreign Trade (BGA), German Farmers' Union (DBV), Association of German Chambers of Industry and Commerce (DIHK) Central Association of German Retail Trade (HDE) Central Association of the German Skilled Crafts Trades (ZDH)

Terms marked with an * are defined in the glossary.

The rationale of an EQF

1. Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?

The umbrella organisations of the German business sector share the main objectives of an EQF, i.e. to increase transparency and mobility. Transparency and mobility, however, must not only be achieved within Europe but also between the different educational and training sectors within national systems. In other words, an EQF must be based on the notion of equivalence of higher education and vocational education and training and provide stimuli to ensure the permeability* of education systems.

In addition to ensuring transparency of education systems, links to the European labour market must be underlined more clearly. Competences should be defined with a view to ensuring employability. This means that descriptors must focus on the capacity to act in a work setting (see question 4). Employment-related qualification processes must be adequately taken into account along with school-based systems.

Competences must look at the “holistic nature”* of qualifications. This will help the individual to identify with his qualification (occupation) and the degree of identification will be much greater than in the case of a mere accumulation of sub-qualifications (atomisation). Moreover, a holistic basic level of qualification (initial qualification) is a necessary precondition for lifelong learning.

2. What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?

Since the EQF is envisaged as a meta-framework, it will have only an indirect impact on individual learners, instructors, and individual companies. Neither individual workers with their individual levels of qualification nor individual national training providers will directly relate to one of the EQF’s reference levels. It is a matter for the National States to make the EQF work in practical terms.

For the EQF to be implemented and accepted in practical terms, the involvement of the business community and the social partners is of central importance. They constitute the link to business and industry at the national and local level, which is essential for the general acceptance of an EQF. Tried and tested and generally accepted national responsibilities and regulatory competences must continue to be valid.

We are strictly against relating the EQF to the EU Directive on the recognition of professional qualifications because the directive regulates access to employment via formal qualifications. This is not the role of the EQF.

The reference levels and descriptors

3. Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?

The EQF is about defined competences for defined reference levels. That is why thinking in terms of national education systems only should be avoided. We must have a well-differentiated and systematic structure of reference levels. It must focus on the development of competence, not on formal qualifications. Reference levels must be clearly separated from each other and clearly refer to learning outcomes.

The EQF is envisaged as a qualifications framework to support lifelong learning. This must be reflected in the number of reference levels, on the one hand, but also in an appropriate distribution of reference levels – just like a learning biography. An 8-level reference structure is appropriate, but this does not hold true for the layout of individual levels.

The current Commission proposal provides for four levels of basic qualifications and another four that cover an individual's entire working life and/or lifelong learning career. If this structure is to be approved, lifelong learning and work place experience must be accommodated for by specifying that level 8 (the highest level) cannot be reached through formal higher education awards and vocational qualifications alone, but only if the individual has acquired additional work place experience (also see answer 6). On principle, each level must be accessible via different learning pathways, in other words it cannot be that certain levels are “automatically reserved”* for higher education.

4. Do the level descriptors, in Table 1, adequately capture learning outcomes and their progression in levels?

A well-differentiated grid (table 1) is needed to adequately capture learning outcomes. The number of descriptors should be limited to a manageable size (easy to handle and meaningful at the same time); they should be clearly delineated and easy to measure. At the same time, they must be open enough to allow for national specificities (“meta-framework”).

The European Commission's approach is a step in the right direction. Descriptors are designed to capture typical learning outcomes for a particular reference level. One weakness of the Commission's current proposal, however, resides in the definition of the reference levels: some of them are not clearly delineated from one another, and individual reference levels cover different bandwidths of competences.

Our suggestion is to add another four qualitative descriptors to the Commission's descriptors for learning outcomes, which allow for a systematic structure and differentiation of reference levels as a function of the acquisition/development of a person's capacity to act in a work setting*. Once the reference levels of a qualifications framework are established, these four descriptors have fulfilled their task. The four descriptors describe contexts that require certain coping skills or competences.

These are:

- Degree of complexity: this refers to the number of possible variables in a given context
- Degree of uncertainty: this refers to the number of variables in a given context, which are not obvious beforehand for the individual

- Degree of interaction: this describes the connexion between different variables in a given context
- Degree of dynamics: this describes the pace of change in a given context

The more complex, the less transparent, the more interlinked, and the more dynamic a situation, the higher the degree of coping skills required in such a context and the higher the respective reference level.

The descriptors for capturing learning outcomes, as suggested by the European Commission, already offer a good basis for discussion. However, they must be developed further in order to overcome the following drawbacks in their design:

- The current subdivision of competences into knowledge, skills, and personal and professional competence suggested by the Commission is an artificial and theoretical subdivision (which lacks a clear delineation): For example: "technical and professional competence" (see table 1) – from the German point of view the entire Table 1 could be summarized under the heading of vocational competence. Another question would be how the skill "use a range of field-specific skills to carry out tasks and show personal interpretation through selection and adjustment of methods, tools and materials" can be delineated from the learning competence "take responsibility for own learning" (Level 3, Table 1).
- The descriptors chosen are difficult to measure by objective, generally understandable criteria or uniform methods (e.g. self-direction, social, ethical or communication competence). Such an assessment is based on a subjective, selective perception without a clear separation of levels.

To overcome these drawbacks in design, the following steps should be taken in our view:

1. Further development and/or completion of the descriptors "knowledge" and "skills" by adding the notion of competence
2. Introduction of a quantitative descriptor, i.e. a European credit transfer systems for VET

Ad 1: There is no logical justification why the notion of competence is used and competences are measured only for the descriptor "personal and professional competence". One should discuss and find out how knowledge can be developed further in the direction of cognitive competence, and skills can be developed further in the direction of functional competence.

Ad 2: A fifth, quantitative descriptor should be introduced to capture learning outcomes, which takes into account the average learning effort required to develop these competences (this corresponds to the student workload concept in higher education). Thus a credit transfer system for VET will become an integral part of the EQF model. Such a system is indispensable, since competences cannot be measured precisely by qualitative descriptors – even if they are designed in an optimum way.

Since the overall aim must be to achieve permeability* between all education and training sectors, ECVET credits should be calculated along the same lines as the credits in higher education (ECTS system). The following principles should be applied:

- All learning periods should be covered: periods of instructor-lead learning, e-learning, student research projects, self-directed learning, examination periods, etc.
- The standard learning time, which is required on average and under normal learning conditions, is measured via an expert monitoring system or other systems
- It is advisable to define a minimum learning time per unit, in order not to end up with very fragmented and confusing modules

- Work processes that are designed according to learning objectives (e.g. periods of in-company training) should be given full credits

The descriptor system, in particular, should go through a period of intensive testing with pilot projects, their evaluation, and, if necessary, their revision in order to test its viability; the descriptors for the definition of reference levels, which we have suggested, should be added.

5. What should be the content and role of the “supporting and indicative information” on education, training, and learning structures and input (table 2)?

The “supporting and indicative information” dilutes the competence-based approach. It relates to places of learning and formal qualifications, like access to higher education. Instead of transparency, it only creates confusion. The “supporting and indicative information” does not take into account that there are many different access routes to a particular reference level, and not just one single route.

Table 2 does not fit all European education and training systems. In this context, we note that such a classification according to formal criteria clearly favours general education systems over vocational education and training systems. Linking certain formal requirements to particular reference levels is something that can be done at national level, if at all, and should thus be left to Member States. If, as a matter of fact, there are no comparable qualifications at European level that can be related to a certain reference level, they should not be created through Table 2! That is why Table 2 should be completely deleted.

6. How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?

As mentioned in relation to Question 3 already, competences should first be defined in relation to a reference level, and then they should be referenced to qualifications (and their titles) (see “automatic reservation”). Otherwise the danger is that the competences of the various qualifications are described in such a way that a certain level can be achieved (arbitrariness, no genuine focus on outcomes). That is why a different approach than in the case of the qualifications framework of the European Higher Education Area (Bologna Qualifications Framework) should be taken. In the Bologna process, three “cycles” were agreed, and each Bachelor Degree is automatically referenced to cycle/reference level 1 of the Bologna Qualifications Framework and each Master Degree to reference level 2.

An automatic matching of qualifications to a particular reference level is not acceptable. For example: on principle, the three cycles of the Bologna Qualifications Framework now correspond to levels 5, 6 and 7 (see our proposal under Question 3). But this should be demonstrated for each and every course of studies on the basis of the competences that were actually developed; qualifications should not just be referenced to a certain level on the basis of the title of the certificate or award. This principle should govern the entire process.

Established national procedures and well-differentiated national responsibilities should be respected when linking qualifications to various reference levels. For Germany and for VET this means, for example, that the definition of competences that underpin particular qualifications and the subsequent matching of qualifications to a particular reference level should be done within the framework of the regulatory activities of the stakeholders, i.e. the business community and the social partners and the ministries.

National Qualifications Frameworks

7. How can a National Qualifications Framework for lifelong learning – reflecting the principles of the EQF – be established in your country?
8. How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?

As already mentioned in relation to Question 2, national stakeholders are responsible for making the EQF work in practical terms. In Germany, in particular, it is absolutely necessary to involve the great number of different stakeholders – with a view to achieving a high degree of acceptance. Opportunities for an implementation at national level should be sounded out and tested through national, regional, and sectoral projects. Above all, such projects should address the following questions:

- Does an EQF offer additional benefits to its users (companies, education and training providers, competent bodies) and is it easy to use?
- Does an EQF directly contribute to an increase in transparency, mobility and permeability?
- What are the implications of its extension for the national education and training system?
- What will be the relationship between the EQF and a possible NQF?

It should be in the European Commission's own interest to trigger a great number of such projects in all European countries. Financial support by the Commission would be welcome.

Sectoral qualifications

9. To which extent can the EQF become a catalyst for developments at sector level?
10. How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?
11. How can stakeholders at sector level be involved in supporting the implementation of the EQF?
12. How can the link between sectors development and national qualifications be improved?

The term sector, as defined in the current proposal, cannot be used at the operational level. By dividing it up into two categories (main economic activity vs. horizontal occupational category) parallel structures are established. Crosscutting/transversal qualifications (e.g. Controller) actually would have to be referenced to different qualifications frameworks. Sector initiatives should not become initiatives that run in parallel to the possible development of a NQF. This will lead to a lack of transparency.

Sectors and their international networks should be used to design and implement NQFs and increase transnational mobility. Sector initiatives can make a valuable contribution to the further development of the European Education and Employment Area. The EU should continue to fund pilot projects in this area. The results of these projects should be used as inputs to the European and national discussion on the implementation of the EQF.

Mutual trust

13. How can the EQF contribute to the development of mutual trust (e.g. based on common principles for quality assurance) between stakeholders involved in lifelong learning - at European, national, sectoral and local levels?
14. How can the EQF become a reference to improve the quality of all levels in lifelong learning?

Mutual trust builds on transparent structures and on personal contacts. The need for stakeholders to know and accept each other is a key element. That is one of the reasons why national responsibilities should be decisive.

Mutual trust must be developed, in particular, when it comes to relating national qualifications to an EQF. To achieve this aim, we should build on existing transparency tools, partnerships, etc. (e.g. the new Europass, PLOTEUS or agreements like the Franco-German agreement on the general comparability of vocational qualifications). All stakeholders involved should engage in a mutual exchange.

Moreover, the introduction of a credit transfer system that comprises all reference levels of the qualifications framework would create a greater degree of comparability, and thus could make an essential contribution to the development of mutual trust between individual education and training areas (see Question 4).

Glossary

"Berufsprinzip" (Vocational principle) and the holistic nature of training

The vocational principle, i.e. certified qualifications in recognised training occupations as a legal entitlement to practice a trade, stands for the expectations that companies have of their skilled workers and for the future skilled worker's claim to be trained to a level of qualification, which is "future-proof", i.e. on which he can build in future, and which he can use on the labour market over a longer period of time.

With the amendment of the Vocational Training Act that entered into force on April 1, 2005, the German Parliament has confirmed the above principle. Pursuant to the Vocational Training Act and the Skilled Crafts Trades Act, vocational training ensures that "through a vocational training programme that extends over several years in broadly based training occupations, which are recognised nationwide," the individual "has the possibility to carry out a great number of concrete occupational activities".

Training in a recognised training occupation/an occupation is intended to offer the greatest possible guarantee of finding employment, provide a basis for lifelong learning, and offer the best possible level of social security.

The integrating and socialisation function of vocational training (via labour markets/employability etc.) and its **holistic nature** cover the following aspects:

- Providing a qualification for the labour market (not just tailored to the needs of the training firm)
- Providing a comprehensive qualification (occupation) according to the occupational standards of the trade, which is holistic, i.e. which can only be learned in a (work) process related environment (and cannot be split into individual activities!)
- Teaching of crosscutting competences

An occupation is an important social and individual reference point (identification with one's occupation, taking pride in one's occupation).

On the other hand, in a regulatory environment, an occupation stands for:

- The principle of completeness of vocational contents and their conformity to nationwide standards (ability to perform in a given occupation)
- The principle of self-governance of the business community (see regulatory powers of the German business community).

Equivalence and permeability

In most education systems in the European Union, higher education and vocational education and training are separate learning and qualification pathways that exist right next to each other. In order to encourage employment throughout Europe, however, it is necessary for all education systems and hence also for the EQF to be close to the labour market and to focus on the individual's employability.

That is why prior learning and competences acquired must be assessed in terms of their usability in the labour market. A decisive aspect is the assessment of a person's "capacity to act in a work setting" (the ability to autonomously carry out occupational tasks and cope with job requirements), which is intended to match a certain job profile. For example, a master craftsman, after several years of work place experience (as a manager of his own firm), has acquired more management skills than someone with a higher education degree who enters the world of work. By comparing actual learning outcomes (in this case: management competence) different types of prior learning can be compared with one another.

That does not mean an automatic recognition and certification of any type of prior learning once a certain level has been reached. But reaching the same level will enable individuals to change over to the other education system and get credit for all or part of their prior learning. This facilitates access to the other systems, since an individual does not always have to start learning from scratch. Access to the system and/or the extent to which credit is given to prior learning will be agreed on by the learning providers bilaterally or through the respective national procedures (voluntary character of the EQF). In other words: learning pathways become more efficient, competences and prior learning are validated and used, "educational dead-end roads" are avoided.

Regulatory powers of the German Business Community

The vocational principle, i.e. certified qualifications in recognised training occupations, is the constituent factor for the self-governing functions of the German business sector. Together with the social partners and the competent ministries, the business community (through their trade associations) defines the qualifications, which are needed for a certain occupation. They are close to the companies and know their needs best. For this reason, central government has delegated certain powers to the self-governing bodies of the business community (chambers). It is only through the chambers, that the marketability and overarching nature of qualification processes (tied to occupations) can be achieved.

When designing and implementing an EQF with all its national consequences, existing responsibilities and competences must be respected, and their expertise must be incorporated in a targeted fashion.

“Automatic reservation”

This term once again points to the problem of “thinking in formal educational awards and education systems”. A qualification, a training programme must not be referenced to a certain level just because of its title. We need to think about a) appropriate referencing procedures and b) suitable quality assurance mechanisms, which also cover the monitoring and referencing of the Bologna cycles (Bachelor, Master...). We are strictly against a centralised accrediting body, e.g. at EU level. Furthermore, it should be set out how the creation of an EQF can be linked to the Bologna process for higher education institutions. The European Commission's proposal does not contain any suggestions in this respect.

Involvement of the business community and the social partners

Following the vocational principle (see above), the business community and the social partners are directly involved in the definition of occupational standards. Training a young and highly skilled workforce will guarantee the competitiveness of German business and of each individual company. Thus the involvement of the business community and the social partners is very important from an economic and employment policy point of view and they should also play an essential part in the introduction and implementation of the EQF.

The role of work place experience

If competences and qualifications are to serve the labour market, it is of key importance to take into account/to validate work place experience. Studies have shown that practical, holistic experiential learning in a real life situation is the most efficient way of ensuring employability.

Such learning is geared to the needs of the world of work and is of central importance for achieving (and maintaining) one's employability. That is why the EQF should take into account work place experience at all levels, in order to properly reflect lifelong learning, which in most cases takes place in parallel to one's job. That is why a high-level university degree (educational award) should not automatically lead to the highest reference level.

Capacity to act in a work setting

The capacity to act in a work setting describes a complex job profile, which goes beyond the qualification as such and also includes behavioural dispositions and functional competences (technical competence, social competence, methodological competence and interpersonal competence).

Capacity to act in a work setting refers to the individual's abilities to function, to carry out tasks in a self-directed manner, and to translate his knowledge, skills and competences into action at the workplace in an autonomous and flexible way.