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## **Creation of a European Quality Assurance Reference Framework for vocational education and training (EQARF)**

### **Position on the European Commission's proposal for a recommendation of the European Parliament and of the Council**

#### **Objectives of a European Quality Assurance Reference Framework for occupational education and training**

The German business community supports the central objective of the proposed recommendation: to help EU Member States to improve the quality of their education and training systems and as a result to build up more mutual trust between the different national vocational education systems. Mutual trust and sufficient practical experience are decisive factors for the successful application of European transparency instruments in vocational education such as the planned European Credit system for Vocational Education and Training (ECVET), the European Qualifications Framework for lifelong learning (EQF) or EUROPASS.

The creation of a European Quality Assurance Reference Framework (referred to as EQARF below) can constitute a useful complement to these instruments. However, bearing in mind the diversity of vocational education systems in the EU, a common European reference framework must incorporate enough flexibility to allow Member States to implement it taking account of the specific characteristics of their own individual system. Hence, EQARF – in particular the quality criteria, descriptors and indicators it sets out – can only serve Member States as a tool to steer the development of their own quality assurance systems. Under no circumstances should the descriptors and indicators be regarded as binding components of a national system.

#### **Poor transparency due to absence of consultation process**

A point that attracts criticism is the fact that the European Commission has not preceded its EQARF proposal with a Europe-wide consultation process – as it did with its proposed recommendations for EQF and ECVET – and built its submission on an evaluation of the results. Similarly, it is difficult to understand why the European Network for Quality Assurance in Vocational Education and Training (ENQA-VET) was only inadequately involved in the final drafting of the EQARF recommendation.

## No EU competence for steering and monitoring education policy

With the level of detail assigned to the objectives, the draft recommendation moves a considerable distance from a voluntary European quality assurance instrument. The reason for this can be traced in particular to the detailed proposals for national implementation (annex I) and the quality indicators – not further explained – including the creation of unwieldy reporting requirements (annex II). In reality, full implementation by the Member States would result in an EU competence for steering and monitoring education policy which goes well beyond the competences described in articles 149 and 150 TEC.

## Voluntary use of the reference framework by Member States

Annex I of the Commission proposal comprehensively describes what tasks national players in vocational education should play at the various levels and how achievements in vocational education should be monitored. Provision is made for a detailed process of continuous quality assurance at national level in which four phases should be cyclically linked: identification of strategic objectives and planning, implementation, evaluation and, if necessary, adaptation of measures. The implementation modalities that the Commission calls for also include a Quality Assurance National Reference Point for vocational education, referred to as QANRP below.

The four steps (planning, implementation, evaluation and review) correspond to current quality assurance mechanisms and are therefore broadly appropriate. However, it must be made crystal clear that full implementation of the detailed reference framework in annex I at national level **is not binding** on the Member States, but is only intended to give a stimulus for voluntary use.

## Timetable for introduction of the reference framework

The proposal presented by the Commission in April 2008 provides for development of national concepts for implementation of the European quality assurance reference framework by 2010. The German business community regards this short time horizon as completely unrealistic bearing in mind what has to be done at national level. The Commission envisages an implementation period spanning several years up to 2012 or only progressive implementation starting in 2012 both for the European qualifications framework and for creation of the planned European credit system for vocational education. Hence, it would be realistic to defer implementation of EQARF to the period after Member States have successfully introduced EQF and ECVET. In addition, seems absolutely essential for Member States to have an intensive pilot phase involving all the players concerned.

## **Explanation and usefulness of the indicators selected**

Annex II of the Commission proposal sets out ten so-called “reference indicators” which should be used to measure progress in quality assurance for vocational education and training. Member States are invited to improve their quality assurance procedures for vocational education using ten common criteria, and to evaluate their policy measures against them.

The principles described as “indicators” are sometimes very special and not always unambiguous. For instance, there is a call for setting explicit targets for vocational education, which should also be linked to the European targets. However, as long as it is unclear how detailed the targets should be and how they are to be monitored, this idea should be rejected. It cannot be ruled out that Member States’ discretion for shaping their own actions will be disproportionately restricted.

At first glance, the envisaged indicators seem appropriate as long as they go no further than measuring quantitative information. Nevertheless, there is a need for clarification, for instance in the proposed indicator 2 “Investment in training of teachers and trainers”. Who should make these investments is left open. By contrast, specifying participant, success and placement rates could help to enable useful quality assurance. Since the quality criteria would have to be applied at both system and supplier level, it must in any event be made clear who would collect the data and the extent of the measurements. In vocational education systems such as the German system in which companies accept a large measure of responsibility as “training suppliers”, there should be no additional financial costs or administrative burden – in particular for small and medium-sized enterprises.

The “participation rate in VET programmes” included in indicator 3 is not relevant for assessing the quality of a vocational education system. The proposed measurement of criteria for socially disadvantaged groups such as migration background or membership of an ethnic minority is inappropriate as an objective quality characteristic.

## **Reduction of red tape and streamlining of reporting requirements**

The Commission itself says that the national administrative effort when the quality assurance framework is introduced at national level should be kept to a minimum. In reality, however, considerable efforts and considerable costs are likely to be involved at both system level and on the part of suppliers in order to implement the monitoring and measurement procedure envisaged by the Commission.

German business therefore calls for national implementation – i.e. preparation of national action plans, collection of data and statistics, and reporting to the Commission – to be not only voluntary but also to apply the principle of proportionality between costs and benefits. To that end, the extensive reporting obligations proposed by the Commission need to be reduced to a reasonable level which can be complied with at acceptable expense.

Moreover, the reporting obligations proposed by the Commission interfere disproportionately with the Member States' competences in the area of education policy. The virtual obligation on Member States to report on implementation of individual measures conflicts with the Commission's emphasis on the voluntary nature of participation in the proposed measures and on the Member States' sole competence for their vocational education systems and policies.

## Specific requests

- A recommendation for a European Quality Assurance Reference Framework for vocational education and training should primarily provide incentives to improve quality assurance systems in the Member States and make them more transparent. It should not set binding requirements.
- Collection of new data via the listed indicators runs counter to the Commission's numerous benchmark and statistics initiatives in the Copenhagen process. It is difficult to see any added value.
- The Commission should make a solid evaluation of the additional efforts involved, in particular the costs of bureaucracy.
- Successful implementation of EQF and ECVET is not linked to a quality assurance framework. As an alternative, a quality charter could be developed.
- Despite ENQA-VET, the role of business and social partners in the quality assurance process is still too limited. This means that in future all business and social partner organisations at EU level working on quality assurance in vocational education must be represented in the network, also including Eurochambres. Quality assurance is not a matter purely for national authorities.