

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

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The ETUC and ETUCE considers important that there is a public consultation, initiated by the European Commission, on simplifying the numerous EU-level qualification, recognition and transparency tools for education and training which have been developed by the European Commission.

Facilitating mobility and recognition of education and training not only contributes to skills development and employability, but also promotes the integration or reintegration into work, learning and training. We fully support the efforts of the European Commission to promote education and training mobility, quality assurance and transparency via these tools.

However, we have the following concerns regarding the public consultation on setting up the European Area of Skills and Qualifications:

1. We regret that the approach of the European Commission regarding the questionnaire is not to gain feedback from the citizens and policy makers on the practical use of these tools at the national and sectoral levels, but to try to get **confirmation that the ongoing design** processes of these tools are indeed relevant and important to maintain. The questions, we believe, should be rather on how these tools can quickly facilitate the improvement of quality in education and training, the increase in the number of and improve the quality of apprenticeship places, more and better skills-matching paths in the labour market, and the recognition of qualifications. The crisis has strongly hit the education and training sector at all levels, therefore the questions should also focus on how these tools can contribute to the **employment** of the students and job seekers in the ongoing **economic and financial crisis**, and how these tools should be revised/adjusted, and if necessary, maintained to ensure efficiency.
2. We regret that the **questions are highly technical** and do not address the general public, who lack information on these tools, and therefore responses from only a few experts who work on these issues at European level can be expected. We are concerned that this consultation cannot lead to any useful results, because stakeholders, especially social partners, who have an essential role in developing these tools, should be consulted in a different way, based on a different approach and questions.

3. We believe that, concerning the **number of the qualification, transparency and recognition tools** it is high time to discuss their use, cost effectiveness, coordination and simplification. The number of tools and frameworks¹ are indeed too many to keep a track of.
4. At the same time, it is still a challenge at the European level discussions to agree on the **main principles** of use of some of the tools and to implement them at national level. There are still many obstacles to finding a compromise among the Member States on these tools. We regret that even though the first discussions with the Member States started 10-12 years ago, they are, to a large extent, not yet half way towards reaching an agreement and starting the implementation at the grassroots levels (in education and training institutes, workplaces, etc.).
5. 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.
6. 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. At European level, there is a similar lack of social dialogue on these tools. For instance the European Commission did not request the Member States to ensure that the 2nd person in the EQF Advisory Group dealing with the implementation of the EU Recommendation on Validation of Non-formal and Informal Learning (NFIL) should be from the social partners, which are best placed to address NFIL recognition in the workplaces and in the labour market.
7. We regret that there is seemingly no **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-general 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.
8. The same problem occurs concerning the **development of the design of these tools and instruments at national levels**; 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 tools at the same time to facilitate transition on the work among these groups.

¹ Qualification frameworks (EQF, QH-EHEA), education and training passports (Europass – CV, Skills passport, Youthpass, Certificate Supplement, Diploma Supplement, Language Certificate), credit transfer tools (ECVET, ECTS), recognition tools (Lisbon Convention, ENIC-NARICs), info centres, networks (Ploteus Portal, EQF Portal, Euroguidance, European Inventory for NFIL), quality assurance tools (ESG, EQAVET), and “Skills intelligence” (EU Skills Panorama and ESCO)

9. We would like to highlight that there should have been **continuous evaluation** of the tools and that the European Commission should have put more importance on **flexibility on managing** these tools. There are numerous experts who have already noted that some principles should be revised, as well as the approach towards the practical implementation of some tools, and possible merger with other tools should be considered, but no change happened.
10. We believe that the tools should not have been set up to solely serve purposes of **different educational sectors**. Many of these tools should be interlinked, however they were set up in different frameworks as separate systems. We encourage the Commission to make urgent changes on the principles and practical approach towards the tools and to try to **serve all sectors on education and training** with them. For example, ECTS and ECVET should complement each other and be recognised by other sectors, but ideally they **should be merged**. ECVET credits should contribute not only to employment of VET students, but also to the permeability of VET towards higher education, and it should also serve the tertiary level VET students. Similarly, there should be an **overarching quality assurance** framework which should be used in all education and training settings, and not only the VET sector (EQAVET) and higher education sector (QH-EHEA).
11. At the same time, it is a challenge to ensure that citizens, mostly the unemployed, make **use of the tools** which are ready to contribute to their employment. At this stage only the Europass instruments (CV, Language certificate, Diploma and Certificate supplement, etc.) are ready to be used by job seekers and graduates, but their dissemination is still not appropriate. The knowledge of these tools among social partners, as well as generally among the citizens, is lacking.

Therefore, we believe that the **purpose of setting up a so-called European Area of Skills and Qualifications should be two-fold:**

1. Based on the **ongoing evaluation of these tools**, the Commission, together with the Member States and social partners, should revise, adjust, and even close discussions on some tools. Those tools which have not shown immediate and forthcoming practical use in increasing quality in education and training or in contributing to employment, should be merged with other tools.
2. The European Area of Skills and Qualifications should also stand as a **dissemination process**. There should be a better understanding among the citizens, especially students, teachers, trainers, and social partners, on the useful tools (eg. Europass, EQF levels and label, EQAVET “label”, European Skills Panorama) and they should use them in order to **facilitate quality education, quality teaching and the employment of the people**.

In order to achieve these objectives, we urge the European Commission:

1. to speed up the European level discussions 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.