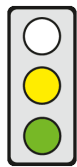


KEY ISSUES

Objective of the Recommendation: The EU is to help make vocational qualifications, acquired in the Member States, easier to compare and will ensure that vocational education provides qualifications that measure up to modern skills requirements, particularly those arising from the digital and green transitions.

Affected parties: All employers, employees, apprentices, vocational education and training establishments.



Pro: (1) Ensuring the comparability of qualifications in the EU facilitates cross-border mobility and strengthens the internal market.

(2) Support for work-based learning may have a positive impact on growth and employment in the medium to long term.

Contra: (1) The three quantitative objectives to be achieved by 2025 are misguided. Basically, vocational education should be oriented towards the needs of the labour market.

(2) The modularisation of teaching content, and awarding certificates in the form of micro credentials, will be detrimental to sound, all-round vocational training.

The most important passages in the text are indicated by a line in the margin.

CONTENT

Title

Proposal COM(2020) 275 of 1 July 2020 for a **Council Recommendation on vocational education and training (VET) for sustainable competitiveness, social fairness and resilience**

Brief Summary

Note: The numbering and page references relate to the proposal for a Recommendation COM(2020) 275.

► Context and objectives of the Recommendation

- VET covers vocational training and vocational upskilling.
- The Recommendation will help
 - to ensure that VET provides qualifications that measure up to modern competency requirements, particularly those arising from the digital and green transitions [Recital 3],
 - make vocational qualifications acquired in the Member States easier to compare [Recitals 18–19].
- The EU uses various instruments to promote the comparability of professional qualifications:
 - The European Quality Assurance Reference Framework for Vocational Education and Training ([EQAVET](#)) of 2009 aims to improve the quality and transparency of VET systems. As transparency has not significantly improved, the EQAVET framework will be extended. [Recital 18]
 - The European Credit Transfer and Accumulation System ([ECTS](#)) facilitates the comparability of qualifications acquired at universities and training colleges. In 2009, the European Credit System ([ECVET](#)) was developed to enable comparability particularly of vocational qualifications. The ECVET points system was not applied in practice and will now be replaced by the ECTS. [Recital 19]
- The Recommendation calls on Member States to work towards achieving three quantitative objectives by 2025 [p. 22 et seq.]:
 - At least 82% of graduates are in employment.
 - 60% of “recent VET graduates” have exposure to work-based learning during their VET.
 - 8% of “VET learners” can gain experience in a foreign country.
- In order to achieve these objectives, the Member States are to take measures in line with the six “principles” that are set out in the Recommendation [p. 22].

► Principle 1: VET is agile in adapting to dynamic labour market changes

- VET offers qualifications that provide a sound basis for employment despite the constantly evolving demands of the labour market and economic fluctuations [No. 1].
- Qualifications acquired through VET also comprise “key competences” including “solid basic skills, digital, transversal, green and other life skills” [No. 1].
- Curricula and qualifications are continuously updated in line with the skills required [No. 2].
- Work-based learning is “further developed” [No. 4].

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- ▶ **Principle 2: Flexibility and progression opportunities are at the core of VET**
 - VET programmes are “personalised and learner centred” [No. 5].
 - The programmes are based on “modules or units of learning outcomes” [No. 6].
- ▶ **Principle 3: VET prepares for the digital and green transitions and for occupations in high demand**
 - VET forms part of the economic, industrial and innovation strategies including those linked to recovery [after COVID-19] and the green and digital transitions. The acquisition of entrepreneurial, digital and green skills will be fostered by continuing VET according to demand. [No. 7]
 - Centres of Vocational Excellence are catalysts for local business investment and will support recovery, transition to a green and digital economy, innovation strategies, smart specialisation and the development of VET at higher qualification levels [No. 8].
 - VET institutions have access to “state-of-the-art” infrastructure, possess digitalisation strategies and integrate “environmental and social sustainability” into their programmes [No. 9].
- ▶ **Principle 4: Modern and digitalised training and skills concepts**
 - Higher VET programmes will be “further developed” and VET integrated into the overall concept of the lifelong learning continuum. The programmes take place in “open, digital and participative learning environments”. [No. 10–12]
 - Teachers and managers involved in VET will undertake initial and continuing professional development in order to work with digital learning tools and in multicultural environments [No. 13].
 - Internationalisation strategies support international cooperation regarding VET. Learning mobility will be in place, including virtual mobility, long-duration mobility and mobility to third countries. “High quality lifelong guidance services” provide user-friendly information on learning and career opportunities throughout the EU. [No. 14–16]
- ▶ **Principle 5: Promotion of equal opportunities**
 - VET programmes will focus on the inclusion of “vulnerable groups” - people with disabilities, low-skilled adults, ethnic minorities, people with migrant background or with “fewer opportunities because of their geographical location”. Support measures and “flexible” training formats will prevent early exits from VET and support the school-to-work transition. [No. 17]
 - VET programmes are also accessible, via digital learning platforms, to “vulnerable groups” and people in remote areas [No. 18].
 - Measures promote gender balance in traditionally “male” or “female” professions [No. 19].
- ▶ **Principle 6: Quality assurance**
 - The EQAVET Framework will be updated [Annex II] and integrated into national quality assurance systems for VET [No. 20].
 - A national reference point brings partners together at national and regional levels and contributes to implementing the EQAVET Framework. Peer reviews enhance transparency and consistency of national quality assurance arrangements, at EU level. [No. 21]
- ▶ **Implementation at national and European level**
 - Member States will
 - take measures to implement the objectives and principles of the Recommendation jointly with the social partners and “other relevant stakeholders” [p. 32];
 - ensure “sustainable public-private partnerships for the governance” of VET [No. 22].
 - The Commission
 - is supporting the development of 50 “Platforms of Centres of Vocational Excellence” and exploring the implementation of “European Vocational Core Profiles”; these measures will increase the mobility of learners and workers and facilitate the “automatic recognition of qualifications” and the development of joint curricula, qualifications and micro-credentials [No. 29];
 - is supporting the digitalisation of VET provision by promoting the “use of European competence frameworks” and self-assessment tools to assess the current status of learning [p. 4, No. 30].

Statement on Subsidiarity by the Commission

According to the EU Commission, “the quality and convergence of VET systems” have an impact on the free movement of people, goods and services as well as the “resilience of the EU workforce”, and generally on the internal market so

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that EU action is justified [p. 6]. It wants to restrict itself to supporting and supplementing the measures of the Member States who will continue to remain responsible for the content and organisation of VET [p. 8].

Policy Context

The Recommendation is based on a Communication from 2010 [[COM\(2010\) 296](#); [cepPolicyBrief](#)] which called for more flexible and higher quality vocational education and training. Since the 2010 Communication, 14 legislative acts [Annex I] have been submitted in the areas of skills and general and vocational education. They form the basis for this proposal for a Council Recommendation. In addition, the Recommendation will contribute to the new EU initiatives, notably on the European Skills Agenda [[COM\(2020\) 274](#)], the updated Digital Education Action Plan [[COM\(2020\) 624](#)], the European Education Area [[COM\(2020\) 625](#)] and the strategic framework for European cooperation in education and training (ET 2020) [[2009/C 119/02](#)].

Options for Influencing the Political Process

Directorates General:	DG Employment and Social Affairs (leading)
Federal Ministries:	Education and Research (leading)

ASSESSMENT

Economic Impact Assessment

Ongoing digitalisation is changing the qualification requirements of European professionals across the sectors. The Commission's desire to adapt vocational education and training to the digital transition, is basically therefore worthy of support. Digital skills improve the chances of professionals on the labour market. At the same time, it is appropriate that the Commission refrains from specifying the adaptation since organisation of the VET system is the responsibility of the Member States.

In addition, the Commission rightly wants to encourage **the comparability of digital and other qualifications in the EU**. This **will facilitate cross-border mobility and thereby strengthen the internal market**. Better comparability requires EU-wide quality assurance and an appropriate credit system. It therefore makes sense to further develop the EQAVET Framework and replace ECVET with ECTS, which is used in practice.

The three quantitative objectives to be achieved by 2025, as advocated by the Commission, **are** – irrespective of content – **misguided**. They should, at most, be used as guidelines. **Basically, VET should always be oriented according to the needs of the labour market**. At the same time, the dual system with work-based learning has proven to be particularly effective, resulting in low youth unemployment and sustainable economic growth. **Encouraging work-based learning** thus goes hand in hand with need-driven training and **may also have a positive impact on growth and employment in the medium to long term** even without the required quotas.

Experience abroad during vocational education and training can also be worthwhile if it represents added value for the company and the apprentices. In this regard, it is already possible to provide evidence of additional achievements by way of the [Europass](#). The decision to spend time abroad in the specific area of vocational education and training should generally be left up to the company and the apprentices themselves.

There is a conflict of objectives in the Commission's call for more teaching of key competences, including general knowledge, as part of vocational training. This may negatively affect the willingness of companies to provide training if such skills are not relevant to the business. Specifically, companies will prefer to invest in education, e.g. by financing vocational training or upskilling, where it conveys knowledge that is specific to the company. This will improve internal business productivity and employees will have stronger ties to the company. General knowledge should therefore be taught principally in school. It remains unclear what the Commission means by "solid basic skills", "transversal skills" and "other life skills".

The success of Germany's dual apprenticeship system arises from the consistently high quality of training content and training requirements. **The modularisation of teaching content in vocational training, and awarding certificates in the form of micro credentials, will therefore be detrimental to sound, all-round vocational training**. Fragmentation of training would mean that companies would have to check qualifications individually and would not be able to rely on the quality of completed apprenticeships.

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Legal Assessment

Legislative Competency

The EU is entitled to adopt measures relating to vocational education policy in order to facilitate adaptation to industrial changes, improve vocational training, encourage access to vocational training and the mobility of instructors and trainees, support cooperation between educational establishments and firms and develop the exchange of information and experience on training systems between the Member States [Art. 166 (1) TFEU]. For these purposes, the Council can, on a proposal from the Commission, adopt non-binding recommendations [Art. 166 (4) TFEU]. At the same time, it must respect the responsibility of the Member States for the content and organisation of vocational training [Art. 166 (1) TFEU]. The Commission's proposal contains recommendations which essentially fall within the Union's wide-ranging area of activity and are thus within its area of competence.

How far the Commission's proposal to realise European core profiles is compatible with the responsibility of the Member States for the content and organisation of VET, cannot currently be ascertained as it is not clear who is to develop the core profiles or whether they will have binding force. On the other hand, binding force is a requirement for the automatic recognition of qualifications which is also being advocated by the Commission. Here too it is unclear who is to define the minimum standards which would have to apply to all Member States as a basis for automatic recognition.

Subsidiarity

The EU is in a better position than the Member States to facilitate the comparability of vocational training and qualifications. To that extent, EU action has clear added value. In other respects, added value is limited.

Conclusion

Ensuring the comparability of qualifications in the EU facilitates cross-border mobility and strengthens the internal market. The three quantitative objectives to be achieved by 2025 are misguided. Basically, vocational education and training should be oriented towards the needs of the labour market. Support for work-based learning may have a positive impact on growth and employment in the medium to long term. The modularisation of teaching content, and awarding certificates in the form of micro credentials, will be detrimental to sound, all-round vocational training.