

**EFEE input to the European Commission hearing on  
a proposal for a Council Recommendation establishing a Quality  
Framework for Apprenticeships**

5 April 2017

With this writing, the European Federation of Education Employers (EFEE) wishes to provide further input to the hearing on a proposal for a Council Recommendation establishing a Quality Framework for Apprenticeships. EFEE is a dynamic organisation established in 2009 to represent the interests of employers in the strategic and highly diverse European education sector. We represent 31 education employer organisations from 16 European countries in all levels of education, from pre-school to higher education and research. This includes different national organisations, such as education councils and ministries of education, associations of VET colleges and universities and local and regional authority employers' organisations.

In 2015, EFEE signed together with the European Trade Union Committee for Education (ETUCE) a joint pledge for the European Alliance for Apprenticeships in which we underline the absolute necessity of improving company-school cooperation on the management, organisation and quality assurance of apprenticeships and work-based learning. Furthermore EFEE provided input to the European Social Partner projects on the quality and cost-effectiveness of apprenticeships.

We therefore highly welcome the initiative of the European Commission to consult (sectoral) social partners on a possible proposal for a Council Recommendation establishing a Quality Framework for Apprenticeships. Regarding the four questions posed in the background paper, we wish to state the following:

- 1) *Do you consider the description of the problem in this paper correct and sufficient?*

Yes, the main challenges and basis/rationale for the establishment of a Quality Framework for Apprenticeship, as outlined in this paper are concurred with. Indeed, not only is there not a common understanding of what constitutes a quality apprenticeship at European level, but also nationally within jurisdictions the elements of what would constitute a *quality apprenticeship* or work based learning experience may not be explicit or agreed within individual states, between the state agencies, providers and the social partners.

Principle 1 of the 'High-performance apprenticeships and work-based

learning: 20 guiding principles'<sup>1</sup> developed by the ET2020 Working Group on VET in 2014-2015 (in which EFEE participated), identifies the need for a clear governance and regulatory framework for apprenticeships within Member States. Implementing a European Quality Framework for Apprenticeships will be problematic without a national governance framework within which apprenticeships operate, this could include for example ensuring Apprenticeship qualifications are mapped to National Qualifications Frameworks, which in themselves will be underpinned by some regulatory infrastructures. However it should be mentioned that it is in the discretion of Member States to develop such national governance frameworks.

- 2) *Do you consider that establishing a Quality Framework for Apprenticeships at European level could be the right vehicle to improve the quality of apprenticeships and ensure effective investments and the implementation of EU programmes?*

The establishment of a Quality Framework for Apprenticeships at European level would be welcomed. The experience to date with quality frameworks and networks would seem to indicate that they are a valuable tool for improving and promoting quality, and engaging member states in the process. The European Quality Assurance Reference Framework and EQAVET network have provided a valuable reference instrument to help Member States to promote and monitor continuous improvement of their VET systems based on common European references and network, supported by common quality criteria, indicative descriptors and indicators, notwithstanding the diversity in practice in Member States. The establishment of a Quality Framework for Apprenticeships at European level would assist in supporting mutual trust, thus facilitating recognition and mobility. In order to improve the effectiveness of the Framework and prevent overlap between existing European initiatives, it might be a good option to streamline the Framework with ECVET, which also still needs to be implemented in a lot of countries.

However, the Framework will have to take into account the specific characteristics that are prevalent in Member States regarding the provision of apprenticeship schemes.

- 3) *In your opinion, what are the main elements for a quality framework, in particular considering a) quality criteria; b) enabling factors; c) European funding instruments?*

In order to make the Quality Framework a success, it should be transparent, not bureaucratic and driven by both education and industry. Cooperation between both parties is essential for realising quality apprenticeships. To have meaningful currency, ensuring

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<sup>1</sup> <http://ec.europa.eu/social/BlobServlet?docId=14881&langId=en>

apprenticeship is a viable and recognised pathway and qualification, the quality framework should be linked nationally to governance and regulatory frameworks; National Qualification Frameworks for example. The value of work-based learning, and the measurement processes, need to be visible and transparent, to enable the apprentice to gain recognition through the national qualification process for their learning and training on the job. The quality criteria should include criteria to enable this recognition. National governance structures for apprenticeships are important in this regard and would assist in transparency and mobility, both within states, across national borders and indeed in the overall wider context of lifelong learning. The European Quality Framework could promote the development of such national governance structures. However it is important to mention that it is up to the national parties involved (policy makers, education providers, employers, social partners) to further define the content of the governance structures. This also applies to the development of quality criteria: the European Quality Framework could be a useful tool to provide an overview of criteria contributing to quality apprenticeships and to provide a reference document in which the responsibilities, rights and obligations of all parties involved are formulated. However, considering the subsidiarity principle and seeing the huge variety in apprenticeship systems in the EU, it would be impossible and undesirable to harmonise standards on for example pay and conditions.

When defining the quality criteria, there should be a strong focus on educational aspects (including learning objectives and recognition of learning outcomes).

Regarding the implementation of transnational apprenticeships, a big obstacle could be the lack of contacts for VET schools to find available places abroad. Facilitating and match making of apprenticeship opportunities across borders for VET schools is very important in order to make transnational apprenticeships a reality.

4) *What role do you see for social partners and chambers in this framework?*

The strong involvement of social partners in projects on effective and quality apprenticeships and in the European Alliance for Apprenticeships, shows the important role social partners play in promoting apprenticeships and work-based learning at European level. Furthermore, the social partners, by which is understood union representatives and employers' organisations, are two principal parties in apprenticeship training at national level. Social partners should play a key role in the development of a new European Quality Framework for Apprenticeships. If they are involved at the developmental stage there is more likelihood of buy-in to key pillars and criteria established. Industry/employers are an integral part of the apprenticeship system, in taking on and training apprentices and in identifying future skills needs for new apprenticeship development.

Furthermore, fostering the relationship and partnership between social partners and education and training providers, and/or the governance system/agencies with regulatory responsibilities would be an important element also of the framework development process.

The role of chambers differ highly per country, therefore it will be difficult to define a standard role for them. However they could play an important role in finding apprenticeship opportunities in other countries and to promote this way apprentices mobility.



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