

Position Paper

UEAPME position ¹ on ERASMUS FOR ALL: The EU programme for Education, Training, Youth and Sport 2014-2020

Introduction

On 23 November 2011 the European Commission proposed a Regulation and Communication on ERASMUS FOR ALL: the new EU programme for education, training, youth and sport 2014 to 2020.

Education and training play an important role within the Europe 2020 strategy, including the quantitative targets, to foster employability and competitiveness in the EU. To this end, ERASMUS FOR ALL is the EU's strategic programme to reach these objectives.

Faced with key challenges and notably the negative consequences of the economic crisis and the high youth unemployment, it is of paramount importance to strengthen the EU Education programme, in order to make education and training systems more efficient and relevant for labour market needs and overcome skills mismatches.

Part I - Key comments and recommendations

UEAPME agrees with the overall aim of the next generation of EU education programmes (2014-2020) to focus on developing skills and mobility of human capital.

However, we consider there are a number of key shortcomings in relation to the new programme, including first and foremost the lack of a budget earmarked for VET and the lack of identified target groups including apprentices.

1. On Budget

Taking into account the difficult budgetary context at European and national level, UEAPME particularly appreciates the efforts made by the European Commission to propose a budget of 19 billion EUR² for the new programme, whilst aiming to rationalise resources and improve outcomes. It sends a strong signal that spending on education and training is considered as an important investment for the future which should provide high returns to increase Europe's growth and competitiveness. UEAPME therefore calls on the European Parliament and Member States to endorse this increase when negotiating the new Multiannual Financial Framework for 2014-2020.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is 55820581197-35.

² It represents a 70% increase compared to the funding of the present LLP, but also has a broader scope, i.e. merging the seven separate LLP subprogrammes, Erasmus Mundus, youth and sport programmes into one.

By contrast, despite allocating two-thirds of the new budget to learning mobility, UEAPME is deeply concerned about the lack of a clear budget and budgetary process dedicated to VET, in particular related to initial vocational education and training and apprenticeship systems (IVET), but also for continuous vocational education and training (CVET). Compared to the current fixed minimum allocations, the new programme consists only of indicative funding.

- **Therefore, UEAPME is requesting to insert the minimum allocation of funds per sector as currently stipulated in the Communication for the actions of the Programme in the field of education, training and youth in the Regulation:**

On Budget (Article 13)

insert: 25% for higher education 17% for vocational education and training and adult learning (of which 2% for adult learning); 7% for schools; and 7% for youth, as well as the corresponding amount in absolute numbers.

In addition, UEAPME regrets that **apprentices** have not been identified as a separate target group within the budget. This is inconsistent with the political priority at EU level newly reaffirmed in the “Youth Opportunities Initiative”³, which attributes a high priority to promoting apprenticeships and work-based learning to tackle youth unemployment.

- **Consequently, UEAPME is recalling the need for apprentices to be earmarked with a separate budget within VET**

2. On the Communication and the Regulation

Both the Communication and the Regulation are very general, omitting for example the important role of companies and SMEs with regard to mobility, yet at the same time there are some clear differences between the two texts.

For sake of clarity the Regulation should be adapted to achieve a more balanced level of detail for the future ERASMUS FOR ALL programme, as is the case with the present Lifelong Learning Programme established by Decision No. 1720/2006/ EC.

Further, whilst a definition of VET is contained in the Regulation, apprenticeships are completely absent in the list of definitions.

- **Since apprenticeships are nowadays very much promoted without a clear agreement on the concept, UEAPME considers it necessary to insert a single definition of apprenticeships**

3. Role of social partners on a political and operational level

UEAPME strongly deplores the lack of reference to and systematic involvement of social partners in the future programme. This is unjustified, presents a lack of discontinuity compared to the current Lifelong Learning Programme and is in contradiction with the European commitments as follows:

- On a political level the Bruges Communiqué states that EU social partners should play an active role in the governance and ownership of the Copenhagen Process and contribute to the realisation of the objectives. UEAPME and its members are fully engaged and actively contributing to EU education and

³ EC Communication adopted on 20 December 2011

training policy formulation, notably the LLP Committee, as well as Advisory Committee on VET (ACVT) and Directors' General Meeting for VET (DGVV).

- On an operational level social partners provide unique expertise. Regarding UEAPME this includes in many cases both employers' federation representing national SMEs and crafts federations, but also national representatives of competent bodies in the designing and awarding of qualifications and organising the mobility of apprentices

- **UEAPME thus strongly calls on the European Parliament and Council to recognise the role of social partners and employers in concrete terms, including the major role played by SMEs⁴ at operational level in the implementation of the VET mobility programme for apprentices, by inserting the following specifications in the new Regulation:**

On Access to the programme (Article 17)

enterprises, social partners and their organisations at all levels, including trade organisations and chambers of commerce and industry (see Art 13.4f, Decision No. 1720/2006/EC)

- **To acknowledge the specific role of European Social Partners on support for policy reforms:**

On Support for policy reform (Article 9)

1. Support for policy reform action shall include activities initiated at Union level related to:

c) the policy dialogue with relevant European stakeholders in the area of education, training and youth, *including European Social Partners (new - add under Art 9. C)*

- **To maintain the complementary and constructive dialogue between European social partners and the European Commission at EU level as in the current LLP Decision:**

On Complementarity (Article 19 - new)

In partnership with the European social partners, the Commission shall endeavour to develop an appropriate coordination between the Lifelong Learning Programme and the social dialogue at Community level, including in the different sectors of the economy. (see Art 13.4, Decision No. 1720/2006/EC)

The Commission shall keep the Advisory Committee on Vocational Training regularly informed of relevant progress in the area of vocational education and training (see Art.13.6, Decision No. 1720/2006/EC)

- **To recognise the role of social partners as observers to the new ERASMUS programme committee according to the present rules for the Lifelong Learning Programme Committee:**

On Social Partners (create a new Article 31)

1. *Whenever the Committee is consulted on any matter concerning the application of this Decision in relation to vocational education and training, representatives of the social partners, appointed by the Commission on the basis of proposals from the European social partners, may participate in the work of the Committee as observers. The number of such observers shall be equal to the number of representatives of the Member States.*

⁴ In 2009, 80 % of Leonardo da Vinci trainees were placed in a company with less than 250 employees - see EC Mid-term Review of 7 July 2011

2. Such observers shall have the right to request that their position be recorded in the minutes of the meeting of the Committee (see Art. 11, Decision No. 1720/2006/EC)

Part II - Specific comments: Architecture and Key actions of the programme

On streamlined architecture and management

UEAPME supports the new simplified structure of a single integrated programme “ERASMUS FOR ALL” on education, training youth and sport, rather than seven separate programmes.

The updated streamlined architecture is based on the right key actions, namely learning mobility, cooperation for innovation and good practices and support for policy reform. This should facilitate the management of the programme, create synergies, facilitate economies of scale and have a bigger impact of individual actions in quantitative terms. It needs to be pursued jointly with the new emphasis on improving the quality of mobility.

Both for companies and individuals a simplified administrative application process is much needed, notably with regard to the supporting documents and post-mobility justification procedures to reduce red tape and time spent.

Further, we assess the reduced numbers of activities and objectives, as well as the proposal for one single coordinating agency at national level as a positive step towards rationalising resources.

Key Action 1: Learning mobility of individuals

UEAPME welcomes extending the successful “Erasmus” mobility brand beyond higher education to VET, which we have long campaigned for in order to increase the leverage of VET as well as putting a new focus on the quality of mobility.

We endorse the focus on developing learning mobility to contribute to fostering the employability of young people and facilitating transitions from education to work. It should help to attain the new benchmark of at least 6% of EU graduates from initial VET having a study or training period abroad, as well as the 20% benchmark of mobility in higher education.

Whilst agreeing that mobility cannot be an end in itself, we are disappointed by the emphasis on mobility within higher education compared to VET and by the fact that apprentices have not been identified as a separate target group. Despite more than doubling the target of vocational training students to spend part of their education and training abroad from 2014-2020, numbers foreseen are still three times lower compared to higher education mobility.

A central aim of the future programme must therefore be to strengthen the mobility of apprentices both in qualitative and quantitative terms and to step up efforts to remove the practical, legal and technical obstacles in relation to learning mobility effectively. SMEs are major players for the mobility of apprentices and young people in VET and are traditionally highly committed to initial vocational training. They require more and better skilled young workers.

As is the case with higher education, VET should also benefit from internationalisation of programmes on an equal footing. This is essential given that both companies and workers are more and more exposed to global markets.

- On technicalities

Due to the high commitments required from enterprises to ensure quality learning mobility of young persons, support should be provided to the sending and hosting SMEs on an equal basis, in order to better recognise their engagement. It is highly desirable for “ERASMUS FOR ALL” to place more importance than the Lifelong Learning Programme did on hosting companies. To this end, a network of competent intermediary organisations must be entirely integrated into the new programme in order to facilitate the access of smaller companies.

Extending the flat-rate grants existing in the current Erasmus programme for student mobility to other beneficiaries is highly necessary on an individual level. This is long overdue in the area of VET, where non-durable funding for mobility activities has led to uncertainties.

On an organisational level, there is also a need to accompany and valorise quality partnerships for better mobility outcomes. To this end, the mobility certificate should be extended from solely project-level coverage to partnerships and consortia to demonstrate their quality management ability. Quality assurance must be taken one step further, not only accrediting projects, but also the networks which guarantee a more systemic approach to mobility.

Regarding the structural funds and the newly proposed ESF Regulation, we strongly recommend avoiding an overlap with the future education programme. At present only about one-third of mobility actions for apprentices are financed by Leonardo itself and the remaining funds stem from other EU or national sources. In future it should be possible to better combine different funding, whilst avoiding duplication with the ESF.

Key Action 2: Cooperation for innovation and good practices

The transnational cooperation between the world of work and education and training is highly desirable to improve the transfer of innovation, know-how and good practices between countries.

UEAPME welcomes in particular the intention to link mobility and cooperation activities to strengthen the systemic impact. However, we consider that peer learning activities and exchange of good practices, currently not included, equally have a role to play in supporting the cooperation process.

On the four main activities:

- Strategic partnerships

Partnerships and networks are decisive for facilitating the participation of apprentices and small enterprises in learning mobility by helping to overcome the existing practical, technical and legal obstacles.

Accredited intermediate bodies, such as professional bodies, play a key role in accompanying the mobility process to secure more durable outcomes (see UEAPME Euroapprenticeship project)⁵. They can provide the necessary support structures and tools to assist the sending and hosting SMEs, crafts and micro enterprises and better valorise their engagement in the quality mobility of apprentices. It thus contributes to better organised learning mobility, to better matching offer and demand and building trust.

The regional and local partnership emphasis is highly relevant for SMEs as the majority operates on a local and regional level.

⁵ Euroapprenticeship project <http://www.euroapprenticeship.eu/en/home.html>

- Knowledge Alliances

The partnerships between higher education and businesses have the objective to facilitate innovative approaches to delivering and exchanging knowledge, promoting creativity and entrepreneurship and new curricula and qualifications.

In the same way UEAPME points out that innovation must not only be limited to high-tech, but must include all areas. The initiative should also pay consideration to SMEs, which unlike large enterprises may find it more difficult to engage in a 1:1 cooperation process with higher education structures. . At the same time they equally need access to new technologies and should therefore not be neglected in the process. The newly planned VET Business Forum should play a key role in this area as well.

- Sector Skills Alliances

We support the alliances aiming at setting up sectoral projects between businesses and education and training providers to establish new sector-specific curricula and encourage more innovative vocational teaching and training and to implement the EU tools.

Partnership support activities are very relevant for sectoral professional organisations in order to develop their own new joint actions and initiatives. This is central to facilitating the recognition and validation of competences acquired during the mobility period through the input of ECVET projects and the dissemination process at sectoral level and should not be limited to large structures only.

However, any adaptation of VET curricula needs to involve social partners, which are best placed to ensuring that the content of education and training reflects the reality of skills and competences needed on the labour market.

- IT support platforms and virtual mobility

ICT can underpin cooperation activities through IT-platforms, e-learning or e-twinning as far as IT platforms are userfriendly. Considerations need to be made about how to ensure sustainability, notably after the launch of the platform.

- International cooperation and capacity building

The intention is to focus on capacity building in third countries regarding higher education and notably the neighbourhood countries. Whereas UEAPME agrees on the relevance of this activity, we deplore the fact that it is limited to higher education. Some UEAPME member federations are already cooperating with the Mediterranean region and other extra European countries, such as notably France or Italy. Therefore VET should be included in order to help expand the European lifelong learning area beyond its borders in a more holistic manner.

Key Action 3: Support for policy reform

One of the main institutional roles of the EU in education and training is to support Member States. The Open Method of Coordination (OMC) and the Lifelong Learning Programme are essential tools to exchange good practices and stimulate structural reforms, as well as to adapt VET policies to change and strengthening the effectiveness of education and training policies.

The impact of the crisis on public finances has highlighted the need for more cost-effective policies and focused outcomes. UEAPME thus welcomes efforts to enhance synergies between policies, benchmarks - in particular on employability and learning mobility - and the EU strategies Europe 2020 and Education and Training 2020, as well as national implementation of the EU tools.

Moreover, UEAPME recommends the funds of the new programme should be more targeted to improve implementation and consistency of the EU tools EQF (European Qualifications Framework), ECVET (European Credit system for VET), in addition to EQAVET (European Quality Assurance Reference Framework in VET) – so far not included. All three tools contribute significantly to strengthening transparency in VET and the learning outcomes approach:

- For the EQF plausibility checks are needed concerning the referencing of the EQF to the national qualification frameworks to examine the placement of similar qualifications in different countries;
- For ECVET, which is currently not a system yet, to pursue the work on facilitating recognition and validation of competences acquired during the mobility period;
- For EQAVET in its function as a toolbox, to develop and increase quality assurance in VET.

Finally, the Copenhagen process has strongly contributed so far in supporting mobility in VET and improving VET quality and efficiency. Member States should further step up their efforts to fully implement the well chosen short and long-term deliverables of the Bruges Communiqué up to 2020.

Conclusion

To sum up, whilst agreeing with the aims of the new programme, a simplified structure and streamlined architecture, we consider that important weaknesses need to be tackled to ensure that Europe's political commitments also apply to the next generation of the EU's education and training programme in a satisfactory manner.

UEAPME thus requests:

- to adapt the Regulation with a more balanced level of detail to ensure clarity for the future ERASMUS FOR ALL programme;
- to earmark a budget for VET identifying apprentices as a separate target group with a specific allocation in the budget;
- to recognise the specific role of Social partners at a political and operational level, as well as the role of SMEs and crafts in the learning mobility of apprentices, including for the sending and hosting mobility;
- to acknowledge and support the role of networks and partnerships of intermediary bodies for quality learning mobility of apprentices sent and hosted by smaller businesses;
- to extend VET mobility to international mobility schemes, as is the case for higher education.

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