Different Approaches to Lifelong Learning in Britain and Germany: 
A Comparative View with Regard to Qualifications and Certification Frameworks

1 Introduction

In recent years, modernization and re-adaptation of VET (Vocational Education and Training) has entered the public agenda as a central issue of educational policy. Despite the fact that education and training differ from country to country in terms of their structural and didactical features (Deissinger 1995) it appears that VET reform for various reasons has become an international problem, a fact that is underlined by the European Union’s confession to lifelong learning as a global strategy for all European countries and the proclamation of 1996 as “The European Year of Lifelong Learning” (Hake 1999). In its White Paper on “Growth, Competitiveness and Employment” published in 1993 (European Commission 1993) the European Commission pointed out that lifelong learning should become “the overall objective to which the national educational communities can make their own contributions”. Two years later, in the well-known White Paper on “Teaching and Training – Towards the Learning Society” (European Commission 1995) the concept of lifelong learning became associated with the idea of a “personal skills card” for every European citizen which would document the acquisition of new knowledge both in formal and informal learning environments.

The overall impression in Germany is that such a process of re-orientation as proposed by the European Commission is currently being enforced most visibly and palpably in Britain where “vocationalism” has established itself since the early eighties as a crucial parameter for fundamental changes in mainstream educational policy (Dale 1985; Melton 1995; Marks 1999). This paradigm has so far clearly affected the institutional and didactical facets of secondary, further and vocational education alike by evoking far-reaching innovations such as the National Curriculum (Cullingford/Oliver 2000) or the concept of modularization in VET (Hodgson/Spours 1997). Remarkable recent proof for the persistency of this strategy and its extension to higher education can be seen in the establishment of the University Vocational Awards Council which tries to link two spheres that in most countries appear to be more or less segregated territories on the educational map: namely vocational education and university education. In contrast, structures and channels through the education system in Germany, including VET, at first glance appear to be more resilient to possible deviations from conventional
paths. One of the outstanding examples of a deeply rooted disinclination to fundamental reform certainly is the Dual System of initial vocational training which owes much of its reputation to the fact that it has remained one of the most frequently (though not necessarily successfully) copied training systems in the world (Arnold 1985; Kloss 1995; Greinert 2001).

For a better understanding of the mental roots and traditions behind the structural patterns of VET systems which may be considered to be responsible for these differences, nothing less than a historical analysis would be necessary – which, for practical reasons, I can only briefly touch upon in my presentation. In this paper I will rather focus on the links between initial and further training in the two countries which appear as a result of a specific “philosophy” of VET. Britain and Germany not only differ in their perception of lifelong learning but these differences to a large extent seem to have their roots in the respective initial training systems.

2 Basic Patterns of VET: Initial Training in Britain and Germany

2.1 The German Model: Vocational Orientation of VET within the Dual System

Training based on what is referred to as the Dual System (Greinert 1994; Zabeck 1985; Raddatz 1983) is still the major non-academic route for German school leavers, giving them formal access to the labour market as skilled workers, craftsmen or clerks (Bynner/Roberts 1991). The system recruits some 60% of the 16-to-19-year-olds and thus contributes to limiting the number of unskilled employees in the German labour market to a constantly low proportion (Büchtemann/Schupp/Soloff 1993: 510; Greinert 1994: 116). Unlike in Britain or France, where they form a marginal sector within the vocational training systems (Gospel 1995), dual apprenticeships exist in nearly all branches of the German economy including the professions and parts of the civil service. In 1999, some 630,000 young people took up an apprenticeship (for figures see Bundesministerium für Bildung und Forschung 1999). All in all, more than 1.6 million young people – with a female share of 40% – are learning their trades through the Dual System. The latter may be characterized as follows:

- It is, of course, first of all an alternating training structure which means that training takes place in a company providing the apprenticeship and in a compulsory vocational part-time school (accounting for one to two days of the weekly training provision).
- Secondly, the German system is rooted in an “occupation-orientated” or genuinely “vocational” training culture: Vocationalism in the German meaning of the term stands for integral qualifications based on uniform training schemes and highly standardized examination procedures (Benner 1977). This implies that training is indeed workplace-led and predominantly practical by stressing the importance of work experience during the training period. At the same time, however, the system works in accordance with skill requirements defined “around the workplace” (Harney 1985; Deissinger 1998).
Moreover, the Dual System is determined by the involvement of the federal and state administration which makes occupational standards and conditions of skilled apprenticeship legally enforceable as well as marketable (Raggatt 1988). At the same time, the German “training culture” (Brown/Evans 1994) is based on the notion that vocational training should not only be interpreted as a contractual duty but also as an educational process under the auspices of both companies and public authorities.

Finally, the fact that the state’s function is actually restricted to securing quality standards in a predominantly formal manner makes the principle of consensus perceptively one of the long-standing parameters of dual training in Germany. This means that public and private as well as semi-private institutions have established various forms of cooperation within the system and, even more importantly, that the social partners normally take the initiative when it comes to defining what kind of training should be forged into a training ordinance (Benner 1984; Deissinger 2001; Streeck et al. 1987).

The vocational or occupational aspect of training is reflected through the structural features of the Dual System. This orientation in fact can be traced back to the legal restitution of the “master apprenticeship” and the development of the “vocational character” of the further training schools around 1900 (Blankertz 1969: 119 ff.; Deissinger 1994; Greinert 1994: 22 ff). The re-formation of the craft training model based on the “principle of self-administration” turned out as the starting point of a consolidation and universalization process that also helped to incorporate industrial and commercial training within the traditional corporatist principle of both the division of labour and the assignment of competences (Harney 1987: 180).

Against this background, the “vocational principle” relies on a specific quality of didactical as well as institutional training arrangements which define the “application requirements” for qualified labour (Kutscha 1992: 537) through a system of occupations bridging the spheres of training and work:

- When we talk about occupation we usually think of “more or less complex combinations of special achievements” which are institutionally fixed and characterized by the use of related qualifications typical of the respective occupation. Therefore they are designed to fulfill the functional requirements of the division of labour (Zabeck 1991: 559).
- Occupations are integrally structured as they represent “relatively job-independent but nonetheless job-relevant patterns of labour” whose branch and individual value is determined by being offered on the labour market as “containing special qualities” (Beck/Brater/Daheim 1980: 20 f).
- Occupations exist not only as “gainful” or “grown-up employment” but as “skilled occupations”, i.e. they are the starting point as well as the target of the training process, whose “organizational picture” (Brater 1981: 32) is standardized by state statutes and thus significantly removed from the limitations and functionalization of individual firms.
- State-standardized “skilled occupations” are the basis of respective training schemes of set duration in which the quantity and quality of skills and knowledge are supervised and validated through intermediate and final examinations as well
as certified in a way acceptable to the labour market. The conditions of skilled apprenticeship hence are closely linked with the notion of homogeneous training courses based on standardized training ordinances (Deissinger 2001).

The mandatory contents of a training ordinance are specified in the Vocational Training Act (VTA) of 1969 (Federal Ministry of Education and Science 1994; Deissinger 1996). According to section 25 VTA it must contain (1) the name of the skilled occupation, (2) the duration of the training period, (3) the skills to be provided by the company in the course of training, (4) a specification of the syllabus “to be followed for the purpose of imparting the relevant abilities and knowledge”, and finally (5) the examination standards. The so-called “principle of exclusiveness” (section 28 VTA) makes sure that training ordinances represent the only way which leads young people into skilled employment:

“(1) Training for a recognised trainee occupation shall be given only in accordance with the relevant training regulations. (2) Initial training in occupations other than recognised trainee occupations shall not be provided for young persons under 18 years of age unless it is intended to prepare them for a subsequent course of instruction”.

The idea behind this strict principle is based on the conviction that each training course is supposed to pin companies down to the skill range of an occupation which shall be marketable beyond the training company itself (BecklBrater/Daheim 1980). The procedure which leads to training ordinances claims to be reality-based and tries to take account of newly developing job requirements stimulated by organizational and technological changes (Deissinger 2001). Since the passing of the Vocational Training Act some 250 “recognised skilled occupations” have been based on new “training ordinances” following the “vocational principle”. They apply to 97% of all apprentices. At present the number of existing skilled occupations amounts to 358. Training ordinances set up the didactical pattern of the qualification process leading to an examination before a “competent authority” (Benner 1977). Most training schemes are so-called “mono occupations” which do not allow specialization, let alone a differentiation of training time or training contents. It is assumed that a broad basis of elementary vocational qualifications supports a maximum of flexibility and mobility between different workplaces and firms. This concept also becomes evident in the training schemes in the metal and electrical sectors which were issued in the late eighties: Specialization only takes place after an initial training period of normally one year which is common to a whole range of occupations related to each other (Stratmann/Schloesser 1990: 266-269).

The “vocational principle” and its institutional and didactical foundations within the German VET system are clearly responsible for a specific understanding of formalized continuing training in this country. Before entering into this topic, I would like to depict the facets of the British training system.

2.2 The British Model: New Vocationalism and the Market Approach to VET

In Britain, vocational training has traditionally followed the structural and functional outlines of a “market model” (Greinert 1988: 146). VET takes place in a decentralized, extremely heterogeneous system, characterized by the particular importance of
individual firms in the development and formation of qualification processes but also offering formal schemes of training and further education (Sorge 1979: 2). In general, however, the system has so far successfully avoided external regulation, especially from the state. Although the government's training acts of 1964 and 1973 highlighted both official recognition of the need for vocational training reform and of its functional contribution to youth employment (Raffe 1987), Britain's "training culture" is still dominated by a "system understanding" far removed from combining legal, organizational and didactical guidelines with firm-based qualifying work, as it clearly prefers various forms of on-the-job training. Against this background, many young people in Britain principally experience their "training period" as "workers" (Bynner/Roberts 1991: 238 ff.).

The contours of the British training system were formed at the turn of the century and can be seen as resulting from the Industrial Revolution (Deissinger 1992: 315 ff.). Industrialization created a "vacuum" in training matters, as the decline of craft-based apprenticeship training was not replaced by any state or corporatist arrangements. The need to fill this "under-regulation" still exists today and continues to determine current vocational training policy requirements (Parkes/Shaw 1992: 72). The system produces qualifications from private and public institutions, within traditional and modern apprenticeships or simple, unregulated traineeships from individual firms as well as, finally, the "work experience" as part of state-subsidised youth training programmes, now called National Traineeships. Most of these schemes, however, have traditionally lacked didactical norms, and there is no more than an optional basis for alternating training arrangements, as vocational school attendance in Britain is not compulsory. The same applies to traditional apprenticeships where the craftsman or skilled worker status is automatically conferred at the end of the apprenticeship without any supervision of the learning process or obligatory examinations (Aldcroft 1992: 55 ff.).

The system of National Vocational Qualifications – or NVQs – introduced in the eighties tries to combine the notion of "legal freedom" and "company training autonomy" with the idea that training should be linked to more reliable forms of certification which prove that a job or training applicant has gained relevant competences (Williams/Raggatt 1998; Hodgson/Spours 1997; Wolf 1995; Aitken/Lilley/Wardman-Browne 1991; Jessup 1991). Although there is now a remarkable degree of formalization within the British certification framework underlying VET the didactical understanding which determines the training process, differs hugely from the German model. This seems especially true with regard to apprenticeships as Paul Ryan points out that "behind all the changes, British apprenticeship continues to differ fundamentally from its counterparts elsewhere in Europe. The differences have even increased, as continental countries elaborate the public regulation of apprenticeship, while the UK favours deregulation" (Ryan 2001).

In Britain, the 1980s marked the beginning of a period of activity and change in vocational training. Among the various projects – such as youth training programmes and the expansion of further education – the involvement of companies within a state-supported and partly state-organized system can be seen as one of the corner-stones of this policy. The NVQ framework thus emphasizes the crucial function of a coherent "system" of vocational qualifications for the competitiveness of British industry.
Although it is intended mainly for people in work or in-company training, its first aim has been to limit the exploding variety of certificates and denominations of qualifications issued by an “army” of different examining bodies and to improve the transparency and marketability of vocational qualifications in general. At the same time the system is to contribute to raising the status of vocational training, implied in the term “national” which has always been seen as the poorer relation of “academic” training in secondary schools and universities. In 1989 Prais described the move as follows (Prais 1989: 52):

“Among the many recent endeavours of HM Government to improve vocational training is the creation of a body to bring coherence into Britain’s so-called “jungle” of vocational qualifications, spawned over the decades and centuries by a myriad of examining and award-granting organisations issuing qualifications at a variety of uncoordinated levels”.

These Examining Boards or Awarding Bodies which are particularly in the “English tradition”, can be dated back to the nineteenth century (Deissinger 1992: 341 ff.). They still are non-state organizations and are funded solely from examination fees (Cantor 1989: 123 f). Their clientele is traditionally made up of the students of the Colleges of Further Education (Euler 1988: 132). Replacing the National Council for Vocational Qualifications created in 1986 the Qualifications and Curriculum Authority (QCA) now has the role of a “supra-organization” in the field of vocational accreditation. The definition of training outside the formal, school-based sector (i.e. the Colleges), however, is still the responsibility of employer-orientated Standards Setting Bodies which develop the competence profile typical of an NVQ, while the Awarding Bodies draw up examination criteria and certificates of qualifications. The task of identifying, coordinating, systematising and accrediting traditional and modern vocational examinations lies with the QCA (Cross 1991: 168). At the bottom line of the system, Colleges and local Training Units deal with the organizational supervision of training programmes ending with an NVQ on the practical level.

The most striking feature of the British certification framework made up of NVQs is – besides the modular design of its qualifications – the fact that training is defined as an objective and not as a specified course (Steadman 1995): Thus it is up to the individual how long he or she trains. The modular principle shaping the system of NVQs gives employers and employees the opportunity to define training needs flexibly and individually and opt for the achievement of competences on various levels: While level 1 may be described as supervised, simple labour, level 4 is seen as high-quality managerial work with a wide range of responsibility. Hence the concept of modularization creates flexibility of competence achievement both horizontally and vertically. It is clearly concerned with making qualifications standards more open and accessible to all types of learners. Besides, the supporters of the system point to its function to promote job-ready skills and its general flexibility potential. On the other hand, critics maintain that the system is bureaucratic, the knowledge factor within the modules is rather underrepresented and that take-up among employers has so far been low (Hodgson/Spours 1997: 15).

It is obvious that from a didactcal point of view the modular principle constituting the NVQ system differs sharply from the German “vocational principle”:
First of all, in the British case, qualifications can be broken down to component parts or units of competence which is not possible in the case of the German non-modularized training schemes. Even “stage training” in the Dual System (section 26 VTA; Pätzold 1983) is based on the assumption that the qualification at each level should be uniform and marketable by representing an occupational standard, not just a bundle of specific competences.

Secondly, the contents aspect of training is less significant in the British system as it is basically an outcome-based approach to VET concentrating on the individual achievement of modularized training objectives. Hence, quality control during the training process is virtually absent and there is no formal examination procedure beyond assessment in the workplace.

Peter Raggatt has very clearly pointed out the differences between the two systems which are relevant for an understanding of lifelong learning in the respective national context: While in Britain legislation has always been viewed as “restricting rights”, in Germany “the law is regarded as guaranteeing rights”. The law which governs the Dual System – by clearly setting up roles and responsibilities for the various “participants” – provides “continuity with the past”, but at the same time functions “as a primary source of quality control” (Raggatt 1988: 176). This implies that the German system of vocational training, though not being state-controlled in a comprehensive sense, certainly contains elements of both regulation and – with respect to the vocational school – even of compulsion which the English “mentality of training” would not accept or even allow.

3 Implications for the Concept of Lifelong Learning in both Countries and its Respective Links to Qualification Frameworks

Traditionally in Britain the emphasis has been on the development of training and continuing training system whose “openness” and “flexibility” appear to be overtly geared to the notion of lifelong learning (Heinz 1999; Holford/Jarvis/Griffin 1999). Therefore the creation of competence comprises of a “career” aspect which is only loosely linked to formal training procedures – as “career” is widely defined: Further vocational training is seen as the flexible adjustment of individual skills and knowledge to the demands of a particular workplace without a basic qualification being necessarily required. Quite paradoxically, this includes the chance to gain a formal vocational qualification during or after a period of work experience. In stark contrast, apprenticeships in Germany are isolated training courses at the beginning of the “professional biography” providing in general a comparatively stable parameter for status and competence acquirement (Sorge 1983: 276 ff). On the other hand, training in the Dual System can be a “largely irreversible decision” since initial errors in picking out the career path may only be remedied at high personal cost (Cockrill/Scott 1997: 347).

Although some of the recently implemented German training schemes (like those in the metal and electrical trades and also in the IT sector) now allow for more specialization (Borch et al. 1991; Müller/Häusler/Sonnek 1997; Petersen/Wehmeyer
they still cannot be split up by isolating discrete modules or independent competency units. This makes access to different levels within the qualification process virtually impossible. While some critics are now calling for more flexible training ordinances hoping that this may lead to more training places and more efficient training arrangements in companies, others maintain that the scope for reform is rather limited. Scepticism in the German discussion has centred on the question whether modular principles are generally compatible with the organizational features of the Dual System as well as with the didactical pattern and pedagogical understanding underlying training arrangements (Deissinger 1998; Deissinger 1999).

As a matter of fact, the regulation mode typical of the German system differs sharply from the philosophy underlying the English system of NVQs where the output aspect is given major attention by stating that it is the result and not the way which counts when it comes to defining qualification standards. However, this difference is more than a mere technical issue. The concept of "recognized skilled occupations" represents a crucial part of the German tradition of in-company training, although the first written qualification standards only reach back to the twenties (Schütte 1992: 60 ff.). Besides demanding the systematic acquisition of marketable skills the dominant feature of this occupational concept may be seen in the implications for the trainee himself: It severs the close connection between specific workplaces and the process of skill formation which tends to "functionalize" workplace skills and thus to restrict the mobility of employees.

Against this background, the further training system in Germany naturally comprises of a strong traditional sector where upgrading qualifications normally means achieving a higher professional level (Dikau 1995). As in initial training the chambers here hold examinations according to the Vocational Training or Craft Acts to assess the knowledge, abilities and experience acquired during a course of further training. This is especially true for the master courses: The master still represents one of the most important non-academic advancement qualifications as it is clearly based on a technical apprenticeship in industry or in the craft sector. Both the apprenticeship and the master course are seen as uniform training schemes and are based on nationally recognized qualifications. In the German formal continuing training sector there are also school-based qualifications, such as the technician, and specialized upgrading qualifications in the commercial sector which are also offered by the chambers. Heinz points out that the formal aspect may still be seen as a crucial feature of the German further training sector since "credentials and formalized certification are more important than ever for applicants to gain admittance to internal labour markets" (Heinz 1999: 13). Therefore lifelong learning implies both an "occupational route" (Aufstiegsfortbildung) and an "adaptation route" (Anpassungsförderung) which individuals take to cope with new workplace challenges.

In English-speaking countries the concept of lifelong learning seems much more strongly associated with the notion of short-term skill development which does not necessarily rely or depend on formalized initial training (Heinz 1999: 14). One of the advantages of the British system may be the fact that further education and training are more openly and flexibly linked to each other via the NVQ framework which does not draw a line between NVQs achieved in initial or in further training. The German system,
on the other hand, presents itself as a split construction: While traditional courses, such as those leading to the master status, still stick to formalized conditions and standards defined by the state as well as to clear examination procedures, further training in companies – especially if it is directed towards retaining and/or extending vocational competences – has meanwhile adopted the qualities of the traditional British “qualification jungle”. While both general education and initial vocational training appear to be “corner-stones” from the Anglo-Saxon point of view, continuing education and training is subject to far less regulation and characterized by its “free-market” organization, the striking plurality of training providers and – most notably – a clear-cut subsidiary function of the state (Cockrill/Scott 1997: 345). Enterprises are actually the main providers of further vocational training in Germany (Greinert 1994: 105).

Against this background, both countries could eventually learn from each other: The British might learn to focus more on the course character and didactical dimension of initial training while Germany might benefit from injecting more transparency into its qualification system within further training. There is no doubt that the modular principle will play a crucial function in VET reform in both countries in the future as there are ways of modularization which seem compatible with the German “vocational principle” (Adler/Lennartz 2000; Deissinger 2000), especially if they are implemented in further training. This could result – though within the restrictions of what may be called the “unchangeable” parts of a VET system – in a “harmonization process” between the two countries corresponding with the objective of making both competence standards and their realization if not compatible, then at least comparable. However, reform options must be measured against the benefits of well-established national patterns of training and re-training, as there is no “global” concept for VET reform. In so far the theory and practice of lifelong learning cannot simply be applied without consideration of national traditions and cultural patterns.

References


