

# **Institutional and Cultural Determinants of National VET Systems: problems arising with the European Qualifications Framework (EQF)**

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## **1 Abstract**

The focus of this paper is on cultural patterns determining national VET systems and policies around the world. Within established typologies VET systems are normally distinguished by referring to institutions and steering mechanisms. However, behind these, cultural patterns underlie both the practice and the theory as well as the policy of VET in various countries. Specific problems arise when it comes to “harmonising” VET systems “through the backdoor”. One of the current supranational instruments in this context is the European Qualifications Framework (EQF).

The paper picks up “matching problems” related to the philosophy of this framework by referring to the German, the French and the British VET system respectively. As we here refer to "dual systems", "school-based systems" and "industry-led systems" respectively, the pre-conditions for transforming European policy into national policies are very different. One major aspect here is the institutional framework, including forms and practices of non-state intervention into the VET system and the responsibility of non-state institutions. In Germany, the chamber system represents a cultural construction which, at first sight at least, seems incompatible with many European ideas accompanying the present "Lisbon-Brugge-Copenhagen Process" which demands the opening-up of education and VET in the context of concepts such as the "Learning Economy" or "Lifelong Learning". VET systems with a strong focus on initial training hereby obviously face the most serious challenges. Solutions may lie in a "nation-specific" strategy which encourages and enables change without dumping the benefits and the functionality of the established system.

## **2 Introduction**

Vocational education and training systems are determined by a specific "philosophy" or "logic" as they stand in relation to specific historical and cultural developments, but also to the way the national economies and labour market processes function in a respective country (Deissinger 1994, 1998; Maurice 1993). With this premise in mind, looking at vocational training from a merely institutional perspective by using the state function as the crucial *tertium comparationis* (e.g. Greinert 1988) reduces the

potential of gaining insight into what may be called the "training culture" of a given country. Germany e.g. has a specific "apprenticeship culture" and initial vocational training, despite its medieval origins and "old-fashioned" terminology, still is the pivotal topic of national policy.

The fact that there is a "historical character" determining the structures and functions of VET systems implies that the general significance given to apprenticeship as an institutional solution towards the problem of skill formation can differ from the focus lying on the interaction or even interdependence between VET on the one hand and general and higher education on the other. Besides the apprenticeship system, school-based forms of vocational learning, such as "vocational grammar schools" in France, "vocational colleges" in Germany or FE colleges in the UK, represent more or less traditional courses and qualifications which are normally institution-based, shaped by state influence and more or less clearly didactically steered pedagogical arrangements. There are, however, differences when it comes to formally linking up these traditional structures with general or higher education.

Another issue, besides institutionalisation seems to be the understanding of vocational pathways (Harris/Deissinger 2003) and valuation given to VET in general which obviously becomes manifest when we look at the challenges imposed by the European Union with its Lifelong Learning policy and one of its derivatives, the European Qualifications Framework. It seems that countries that differ in terms of their VET systems and traditions, especially with respect to the relationship between full-time VET and company-based training, such as apprenticeships, also differ in terms of their adaptability to the overarching European VET policy ideas. One of these ideas is the conceptualisation of "National Qualifications Frameworks" (Young 2003).

### **3 The European Qualifications Framework and the European Lifelong Learning Perspective**

Despite the fact that education and training differ from country to country in terms of their structural and didactical features it appears that VET reform for various reasons has become an international problem, a fact that has been emphasised 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 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.

It is obvious from these political developments that the EU sees the borders between various sectors of the educational and/or training system, including higher and further education, as more and more permeable while the perception of a mismatch of learning outcomes with work requirements forces national and international agencies

to re-define courses, pathways as well as curriculum patterns. In recent years, a new concept, the European Qualifications Framework (EQF), emerged from the so-called “Lisbon-Brugge-Copenhagen Process” (Winterton 2005) and the underlying principles of an European VET policy which is directed towards Lifelong Learning (European Commission 2005), inclusion, and the notion that both education and VET systems should form a permeable holistic entity.

#### **4 Matching conditions for national VET Systems**

##### **4.1 Germany: Apprenticeships as strongholds of VET**

In Germany, the apprenticeship system (dual system) is the strongest stream in post-compulsory secondary education. Reasons lie in the specific cultural tradition, represented by the notion of craftsmanship and mastership in an occupation closely linked to formal training both in the company and in the part-time vocational school. Hereby, both institutionalisation and didactical systematisation and standardisation form the basis of this kind of the German “learning culture” in the apprenticeship system (Harris/Deissinger 2003). In this system, with its 350 recognised training occupations, the commitment and interest of chambers, trade unions and companies are crucial and are considered as prerequisites for keeping it going. A specific pedagogical component comes in with the compulsory subjects provided through school attendance in the part-time vocational school, which stands both for theoretical vocational learning as well as general education during the apprenticeship. Ryan puts this in contrast with the British approach to VET: “A striking difference from Germany is the absence of minimum training periods, such as a three-year programme for bakers. Similarly, apprentices need not take part-time technical education” (Ryan 2001, p. 136). This compulsory post-secondary apprenticeship system in Germany is also law-based, i.e. through the school acts of the federal states, but also – relating to company-based training in the dual system – to a national training act, the Vocational Training Act (VTA) which is characterised by two crucial features (Deissinger 1996):

- The VTA places vocational training in the hands of firms and chambers and thus emphasises the principle of self-government (Zabeck, 1975; Deissinger 2001a). The Act takes account of the traditional features of guild apprenticeship while at the same time submitting in-company training to homogeneous, supervisable and examinable standards. The „competent authorities“ function as monitoring agencies for in-company training and organise and certify exams during and at the end of an apprenticeship.
- Although it only covers company-based training, the VTA contains stipulations which confirm and refer to the existence of the second „learning venue“, the part-time vocational schools. The legal confinement is based on discrete legislative functions between states and the federal level which the German constitution has laid down. Against this background, vocational training is linked up both with the school law and the law of labour.

Against the background of missing links between various forms and sub-systems of VET, the federal government realised a new Vocational Training Act in 2005 referring to the following intentions (BMBF 2005):

- the inclusion of vocational preparation schemes within the scope of regulation of the law and with it the implementation of an appropriate system of qualification modules;
- the transferability of credits obtained in school-based VET via by-laws of the federal states;
- a more intense internationalisation of VET by providing opportunities for apprentices to undergo part of their vocational training abroad; and
- an ongoing modernisation of examinations by establishing the "extended" final examination.

Modernisation within the dual system currently seems to happen mainly on the curricular level. It has materialised in the creation or revision of training schemes within the system of "skilled training occupations" which now even allow for modest features of modularisation. Implanting modules within training schemes as didactical units with a mandatory but optional character (like in the IT occupations created in 1997) no longer seems to be incompatible with a holistic notion of competence (Euler 1998, pp. 96 ff.). However, there are other suggestions using modules in a more open manner, and there is a general conviction in the research community that the system has to become more flexible (Euler/Severing 2006; Baethge/Solga/Wieck 2007). On the other hand, interest groups, such as trade unions and chambers, are eager to underline their belief in the efficiency of the dual system as the "king's way" into skilled employment. It becomes evident from this that the debate on the introduction of a "German National Qualifications Framework" (Deutscher Qualifikationsrahmen DQR) implies many problems for the comparatively solid and historically grown German education system and especially for the country's apprenticeship culture (Deissinger 1994; Deissinger 2004).

Besides demands for "internal modernisation", the new Act passed in 2005 contains quite innovative stipulations which concern the relationship between apprenticeship training in a recognised occupation and full-time VET courses leading to vocational qualifications. Sections 7 and 43 of the new Vocational Training Act try to build "bridges" between the two sub-systems (Lorenz/Ebert/Krüger 2005):

- According to section 7 the federal states get the right to determine which courses in full-time vocational schools or in comparable institutions shall lead to a partial accreditation in a subsequent apprenticeship. Applications for accreditation have to be submitted individually to the chambers (as the "competent bodies").
- According to section 43 people graduating from a full-time course leading to a vocational qualification shall get the permission to undergo a final examination in a recognised occupation before the chamber if the occupation trained for in a school is equivalent. This new regulation also includes so-called "school occupations" outside the scope of the Vocational Training Act or the Craft Regulation Act.

These regulations, when put into practice, could re-position different pathways into skilled work and could help to cure the notorious acceptance problem haunting full-time VET (Deissinger 2007; Deissinger/Smith/Pickersgill 2006). It is too early to assess the consequences of these new stipulations. They could help to establish

bridges between separated sub-systems and hence comply with some of the EQF premises. However, there is no doubt that their practical relevance is dependent on the value companies and chambers will place on full-time VET in general. It is certainly true for Germany that the apprenticeship systems is seen as the stronghold for the VET system in general while alternative pathways function in a different way in relation to both inclusion of higher education options and curricular designs. The German s dual system has hardly any links with higher education and vocational full-time schools fulfil ambivalent functions in relation to the labour market. This structural feature may be listed as one of the open issues still to be solved when designing the DQR alongside the EQF (Deissinger 2006; Hanf/Rein 2007):

- Open issue (I): Links between VET and HE in terms of progression, inclusion and permeability of the education system
- Open issue (II): Links between different streams within VET, especially when it comes to valuation and accreditation of non-dual VET or vocational preparation and integration measures
- Open issue (III): Differentiation within VET in terms of skill levels and duration, also with as view to special groups and/or disadvantaged young people
- Open issue (IV): The relationship between non-formal and informal learning and formal VET

It is above all the so-called “measure system” or “transition system”, with a growing number of school-leavers entering “irregular” tracks in the VET system, which seems a major “construction site” against the background of training market pressures and training market failure in specific regions and branches, but also in terms of young people with lower abilities (Neß 2007; Walden 2006; Krewerth/Ulrich 2006). In these fields, Germany faces the challenge of a substantial backlog demand. On the other hand, the skill formation function of the apprenticeship system, admired all over the world, certainly is an asset which should be preserved. However, this does not necessarily mean that VET policy primarily focuses on issues related to the dual system, such as modernisation of training schemes or the training market. Taking the European framework issue seriously, also means that the “irregular system” and more individualised perspectives on VET enter the political and pedagogical agenda more visibly and strongly.

#### ***4.2 Britain: Vocationalism and National Vocational Qualifications***

The features of the British VET system go back to the Industrial Revolution when industrialisation created a "vacuum" in training matters as the decline of craft-based apprenticeship training could not be replaced by state or corporatist arrangements. The need to fill this "under-regulation" still exists today and continues to determine current vocational training policy requirements. VET takes place in a decentralised, heterogeneous system, characterised by the particular importance of individual firms in the development and formation of skill formation processes. In general, the system has so far successfully avoided external regulation, especially from the state.

Although having become a major focus of VET policy in recent years, the British apprenticeship system as one sector of this VET reality “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, p. 133). It is obvious, especially from a German perspective, that this lack of process regulation “reflects Britain’s „competence-based“ approach to skill certification” in the context of the system of National Vocational Qualifications introduced back in the 1980s (Jessup 1991; Wolf 1995; Deissinger/Hellwig 2005). In Ryan’s words: “What matters in principle for NVQ certification is demonstrated competence in the performance of work tasks, and that alone. Educational attainments should indeed form part of that assessment if they are needed for competence, but are otherwise to be discarded as superfluous” (Ryan 2001, p. 133.). Some authors even put it more strongly and critically when they talk of “behaviourist reduction” and the still existing problem of diverging “roads” between “high skills” and “low skills” (Winch/Hyland 2007) or when they deplore the “decline of vocational learning” (Hayward 2004).

Yet, in contrast to Germany, apprenticeships in Anglo-Saxon countries are considered to be part of a national qualification system including different options and pathways. Also, intention-wise, apprenticeships are considered to provide training which is seen as equivalent with pathways in general and higher education (inclusive character). This is especially true for Britain and also for Australia where apprenticeships have been revitalised or reframed in recent years due to dissatisfaction with school-based skill formation as well as with traditional on-the-job training (Ryan 2001; Harris/Deissinger 2003; Harris 2001).

Britain as a “framework country”, as it might be labelled from a continental European perspective, certainly has the more “modern” concept, measured alongside the rhetoric used by the European Commission and other agencies committed to the EQF strategy. This poses the question whether countries with a weaker apprenticeship culture or a weaker initial skill formation system might be more prepared for the “Lisbon-Brugge-Copenhagen Process”. In fact, it cannot be denied that the EQF which the European Parliament has meanwhile agreed to appears to be a copy of the NQF in England and Wales, with its focus on equivalence patterns between general, vocational and higher education, pathways and permeability (similar to the Australian QF). At the same time, the rhetoric and terminology which the EU uses in this context sounds and reads familiar for those who look to the descriptors for the different levels of competence achievement in the English NQF.

It becomes clear that – while Germany and France “think” in categories of separation and segregation (though with different meanings and political implications) – in England there is – at least formally – a key momentum in the national VET system which links up different streams in the education system in terms of equivalence. The cultural and historical background for this may not be located in the 19<sup>th</sup> century, but more in the “invention” of “Vocationalism” during the Thatcher years, with its strong focus on company-based training and the re-invention of employer commitment in this field. The creation of the National Qualifications Framework in the late 1980s brought into focus the notion that qualifications and pathways in both horizontal and vertical terms should put VET at least partly to be placed on a level with general and academic education. The re-invention of “Modern Apprenticeships” (Ryan 2001; Gospel/Fuller 1998) is part of this process against the background of a history which

saw the major decline of this vocational training institution (Gospel 1995; Deissinger 2004).

### **4.3 France: The framework concept in a centralised VET system**

In France, the situation is different from Germany and Britain. France has always been described as a “school model” of VET (Greinert 1988). This label is due to specific structural features which are closely linked with the crucial role of the central government in steering the whole education system (Bouyx 1996). Therefore, the situation is different from Germany, where the federal states have the nearly exclusive say in all educational matters outside company-based VET, and also from Britain, where in the school system local and regional control and autonomy has always had a specific importance, although the National Curriculum and the NVQ system stand for a more central steering perspective of education and training policies.

France seems to be “prepared” for the EQF in so far as its education system is already structured in “stages”, “levels” and “grades”, indicating the value and the progression options in the whole system. One striking feature is the separation of apprenticeships (apprentissage) from the state school system, which has implications for the social value this institution is normally rendered (Hörner 1994, Deissinger 2001b). Although the organisation of apprenticeships resembles the dual system in Germany, its quantitative importance falls behind the three major tracks in the vocational school system (called “lycées professionnelles”): the CAP, the BEP and the BacPro. It is especially the latter (Gendron 2005) which, besides being a vocational qualification, offers a second option, i.e. the progression into higher education while the CAP and the BEP are “normal” vocational qualifications on different levels of the French NQF. It helps to bridge the two separated worlds of general and vocational education and hence is seen as an instrument to soften the “strong structural dualisms” typical for the French system (ibid., p. 33). Therefore, despite its obvious centralistic implications, the French system appears more pluralistic than the German one.

Since 1969, the French NQF or CNCP (Cadre National des Certifications Professionnelles) has been in existence comprising seven levels and sub-levels, reaching from “Niveau VI” (completion of compulsory schooling without a qualification) to “Niveau I” (the highest level of university education including research studies). Examples for the latter are the “Diplome d’Etudes Supérieures Spécialisées” (DEES) and the newly established Master Degree courses and qualifications. The indication “Bac+5” stands for the years of studies following the obtainment of the French university entrance qualification (Baccalauréat), which is located on level IV of the French NQF (Hörner 1994; Zettelmeier 2005). The core vocational qualifications (CAP and BEP) are situated one floor downstairs on level V, which also means that failing to pass the French “A level” examination (being on the same level) leads to being on the same level with somebody who has completed a skilled worker’s qualification successfully.

It is correct, against this background, to label the French VET system as hierarchical and profoundly rooted in the notion of general and technical, but not vocational education. In this context, historical explanations may be referred to in order to understand why this system works as it does: Apprenticeships as the low-quality and

low-status stratum of the VET system have never been a strong component in the French education system, due to their virtual legal abolition in the wake of the French Revolution. Also, in France, labour markets work in a different way than in Germany and organisation patterns of companies and above all public institutions follow the hierarchical qualification structure which the state reproduces through its schools in a more or less direct manner (Maurice 1993). On the other hand, having incorporated the “framework concept” even earlier than the UK, France seems better prepared to think in categories of equivalence and parity of esteem than Germany, although the notorious devaluation and bad reputation of practical, company-based VET, such as the apprenticeship system (Lasserre 1994), certainly is a burden which France takes into a unified European concept of education and training. The CNCP, however, is an instrument which – at least theoretically – depicts the formal relations between different qualifications and their underlying institutional structures. The latter, however, are still seen as crucial in defining the quality and social implications of educational pathways which are predominantly characterised by their theoretical and academic level of learning and teaching. Therefore, France seems formally more prepared than Germany, while the mental borderlines between school types, types of qualifications and pathways within the education system are likely to remain.

## **5 Conclusions from a German perspective**

In the German political perspective, there are different positions when it comes to assessing the implications and impacts of the EQF and its derivate, the German NQF: On the one hand, national agencies like the Federal Institute for Vocational Education and Training “welcomes the development of a European Qualifications Framework in principle”, as the Deputy President of this national agency has put it recently (Weiss 2007), stating that attainability of any level of qualifications should become possible via the “vocational pathway”. On the other hand, it is still initial training which is seen as fundamental in this process and therefore should be protected from erosion due to the European policy processes while it seems inevitable that employers become more open for flexible and regional solutions when it comes to the formation or accreditation of vocational qualifications (ibid.). In the current debate accompanying the impending construction and implementation of the DQR, one of the basic problems could be the questioning of the “vocational principle” with its holistic notion of “full” and “fundamental” qualifications from which any career or employment perspective should emerge (Deissinger 1998; Reuling 2000). While the French and British VET policies seem much more pragmatic (notwithstanding their diverging motivations and backgrounds), the German debate can be characterised as “protective” and “conservative”, with the trade unions and the craft sector as the major defenders of traditional institutional arrangements in the VET system. One major mental move could be to acknowledge that the German system no longer is as clearly dominated by the dual system as it was in the past. Full-time VET, vocational preparation and integration programmes now make up the reality of the VET system while regional training markets determine the need and viability of apprenticeships on a large scale.

The first step “into Europe” for the German VET system could be to re-assess and re-develop its system of links and accreditation mechanisms with respect to full-time VET. Such a move would not necessarily require to copy the British or Australian



system but would reflect the acknowledgement of one of the crucial premises underlying the EQF, i.e. the appeal to “build bridges” between sub-systems, pathways, forms of learning and institutions in the VET system. However, such a move certainly requires more flexibility and openness towards the European VET strategy without ignoring the experiences of the Anglo-Saxon VET systems with “outcomes” and “competences”.

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