

The Comparability of Vocational Qualifications in Europe

Report produced at the request of the
European Centre for the Development
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CEDEFOP

**The Comparability of Vocational Qualifications
in Europe**

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Foreword

A. H. Koelink was commissioned to write this report towards the end of 1991. It documents, comments on and evaluates one of the most important projects developed at CEDEFOP in recent years. After it had been approved and the legal aspects clarified, the project was implemented in 1985.

This has not been merely a research or study project; it was designed principally to give the Member States and the EC as a whole reliable, accurate and adequate information on the comparability of vocational qualifications. The project aims to give employees and employers every opportunity to assess and utilize qualifications and certificates relating to the labour market and vocational training spheres in all EC countries.

Even though the information on the results and the completed work will really only be effective when the Single European Market comes into force in 1993, the EC Commission and the Member States decided in early 1991 to evaluate the experience they have gained with the system and its application. This process of evaluating and drafting possible new foundations for taking decisions is currently under way. Without wishing to anticipate the results, CEDEFOP has also undertaken various steps to evaluate the work, as suggested by the EC Commission. This report is an important result of these steps.

The author has long been an authority on CEDEFOP. He has always taken a great interest in the work of this project both from within and outside CEDEFOP. He endeavours to maintain the necessary distance when viewing the subject from the historical perspective as well as from the angle of an experienced vocational training expert. He had access to documents published over the years by various authorities and also to the national evaluation reports excepting those of Greece and Ireland. Even though a number of weaknesses in the system do need improvement, A. H. Koelink's overall

response to the work is positive.

The commissioning bodies thought A. H. Koelink would be a good choice for this job of writing an objective expert report for two reasons: In his function as the Dutch government representative in a number of EC committees including the Management Board of CEDEFOP of which he was sometimes Chairman, he was known as a person who not only presented his views frankly and lucidly but also as someone who was adept at substantiating them.

During this time he did his utmost to encourage Ministers of Education and Labour, not only in his own country but throughout the EC, to step up their communication on and coordination of vocational training issues. It was at his instigation, for instance, that the first joint EC meeting of Ministers of Education and Labour was held in 1983 where a comprehensive programme of action on "Vocational training policy in the EC in the 1980s" was passed. The comparability project, which is on common ground between education and working life, i.e. also on the border between education and labour administrations, played a specific role here as well, even if it was not overly significant initially. In recent times the project has been in the limelight far more due to the challenges of the Single European Market starting in 1993.

In view of these far-reaching challenges and the diverse interests and needs of its users, this project can only be the first step in an improved joint process of familiarity and recognition. The existing structure needs to be extended and constantly upgraded. Experience has shown, however, that reliable and highly transparent information is more likely to help those who need it than steps aimed exclusively at harmonizing statutory and administrative regulations and bringing them into line with each other. The comparative tables and occupational profiles can be made

accessible in data banks throughout the EC. They are an important tool to back up existing guidelines on recognizing vocational training qualifications and they will help the Member States to implement the guidelines by providing concrete information. Priority must be given to extending this comparative work, to comparing systems and making them more transparent by including higher qualification levels as well. The expert report also makes some interesting proposals on this, which will most certainly be taken further.



Ernst Piehl (Director)

1. INTRODUCTION

This interim report, compiled at the request of the Cedefop board, is by way of being a self-examination focusing on progress in the area of the comparability and recognition of vocational qualifications. Such a self-examination is appropriate, since over the last four years around 20 per cent of Cedefop's budget has been channelled into this area of work. The question of the recognition of diplomas is among Cedefop's central concerns, moreover, and indeed is specifically mentioned in the Directive by which Cedefop was established (337/75, 10 February 1975), which lays down that one of the Centre's tasks shall be:

"to encourage and support any initiative likely to facilitate a concerted approach to vocational-training problems. The Centre's activity in this respect shall deal in particular with the problem of the approximation of standards of vocational training with a view to the mutual recognition of certificates and other documents attesting completion of vocational training."

That we now talk about the comparability of vocational-training qualifications rather than the mutual recognition of certificates reflects the fact that progress in this area has proved harder to achieve than many in Europe had thought. The approach practised by Cedefop has shifted the emphasis from "recognition" to "comparability", and the Council Decision of 16 July 1985 refers specifically to the comparability of qualifications. This Decision sets the framework for Cedefop's activities in this area

and therefore also for this report.

The background to the Council Decision is covered in a brief historical review. We also make the link with developments in the area of "professional" rather than "salaried" or "waged" occupations.

2. HISTORICAL BACKGROUND

The Treaty of Rome, which dates from 17 April 1957, is the foundation for all European Community activities.

Article 3c of the Treaty refers to the removal of barriers to the free movement of persons, services and capital.

One of the effects of the Single European Act of February 1986 was to add to the Treaty of Rome a new Article 8a requiring the Community to adopt measures aimed at the progressive establishment, by 31 December 1992, of a single market without internal frontiers in which the free movement of goods, persons, services and capital was ensured in accordance with the Treaty's provisions.

This interim report is of course concerned with the steps taken to remove obstacles to the free movement of persons, and more specifically those which may prevent individuals from living and working in another Member State. Title III of the second part of the Treaty of Europe (the Foundations of the Community) deals with the free movement of persons, services and capital. Of relevance to this report are chapters 1, 2 and (to a small extent only) 3, which deal respectively with workers, the right of establishment, and services.

Strikingly, chapter 1, which is concerned with freedom of movement within the Community, contains no specific reference or provision implying that the non-recognition of a certificate or diploma might limit workers' rights to:

- accept offers of employment actually made,
- stay in a Member State for the purpose of employment in accordance with the provisions governing the employment of nationals of that state laid down by law, regulation or administrative action.

The position set out in chapter 2, which is concerned with the right to live and work in another Member State, is somewhat different, in that Article 57, para. 1, states that "in order to make it easier for persons to take up and pursue activities as self-employed persons, the Council shall, on a proposal from the Commission and in cooperation with the European Parliament, acting unanimously during the first stage and by a qualified majority thereafter, issue Directives for the mutual recognition of diplomas, certificates and other evidence of final qualifications."

Article 66 of chapter 3 also declares Article 57 to be applicable, thereby introducing regulation of the mutual recognition of diplomas etc. for the provision of services.

The free movement of professionals, entrepreneurs and service-providers requires "extra" measures not applied to

employees. The provision of services and the exercise of professions in another Member State are subject to that State's own statutory or administrative provisions, and those who do not satisfy those provisions - and that will generally include professionals from another Member State - may not carry out the occupation in question.

Wage-earners are apparently considered to be covered by the provisions applying generally to the free movement of persons, which prohibit discrimination. This is very clear from Article 48, which states that freedom of movement for workers is to be secured by the end of the transitional period (para. 1) and that such freedom of movement entails "the abolition of any discrimination based on nationality between workers of the Member States as regards employment, remuneration and other conditions of work and employment." (para. 2).

An analysis of the precise reasons for the differential treatment of employees and professionals would be outside the scope of this report; the point is simply to note the difference, together with the fact that the European Act of 1986, while it amended a number of Treaty articles, did make no amendments in this area.

The fact that the Treaty texts dealing with employees do not mention the mutual recognition of diplomas and other qualifications does not mean that the issue has not been considered at length within Commission and Community bodies; on the contrary, it has been a stumbling block

for many years. Debate on the issue has focused mainly on measures concerned with vocational education and training, and it is to these that we now turn.

The basis for a common policy on vocational training is laid in Articles 118 and 128, which are included not in that part of the Treaty of Rome concerned with the free movement of persons, services and capital but in the third part of the Treaty, concerned with the policy of the Community. Title III within that part deals with social policy and comprises two chapters, namely social provisions and the European Social Fund.

Chapter 1 includes Article 118, under which the Commission is given the job of promoting cooperation between Member States in the social and employment field, notably in the areas of:

- employment,
- labour law and working conditions,
- basic and advanced vocational training,
- social security,
- the prevention of occupational accidents and diseases,
- occupational hygiene,
- the right of association and collective bargaining between workers and employers.

This report focuses of course on initial and continuing vocational training.

Article 128 of Chapter 2, which deals with the European

Social Fund, states that: "The Council shall, acting on a proposal from the Commission and after consulting the Economic and Social Committee, lay down general principles for implementing a common vocational-training policy capable of contributing to the harmonious development both of the national economies and of the common market."

Neither the wording of this article nor its location within the Treaty of Rome gives any indication of any link with the recognition or comparability of qualifications of any kind; on the contrary, vocational training is seen as a way of contributing to the harmonious development of the economy of the Community and its Member States.

It was not until 1963 that a common policy on vocational training came to be seen as relevant to the free movement of workers. On 2 April 1963 the Council adopted a Decision laying down general principles for implementing a common vocational-training policy, thereby carrying out the first part of Article 128. In the preamble to its Decision the Council noted among other things that implementing an effective common policy on vocational training would facilitate the free movement of workers. At the same time the establishment was announced of an advisory committee with the job of strengthening cooperation between governmental and non-governmental bodies concerned with vocational-training issues in the Member States.

The general principles set out in the Council Decision

comprised ten points, the eighth of which stressed that a common vocational-training policy needed to aim notably at the gradual approximation of the different levels of training; to this end a harmonized description of basic requirements was needed. On that basis greater unity would be sought on the objective requirements to be met by candidates taking final examinations, with a view to the mutual recognition of diplomas and other qualifications issued to those successfully completing courses of vocational training.

This was the first mention of the harmonization of basic requirements and the mutual recognition of qualifications as objectives of Community action aimed at employees.

The next development was the Council resolution of 6 June 1974 on the mutual recognition of certificates etc., which used the term comparability for the first time. The resolution referred to the large measure of comparability which existed in practice - despite differences between training programmes in the Member States - between the final qualifications giving access to particular occupations, and concluded that regulations governing the mutual recognition of qualifications and access to occupations should as far as possible avoid laying down detailed training requirements.

It then proposed that the Committee of Permanent Representatives, working with the Commission, should compile lists of qualifications which could be recognized

as equivalent.

The resolution of 6 June 1974 was mainly concerned with freedom of movement for professional persons, but its wording was so general that it could be applied in any other situation in the Community to which the mutual recognition of qualifications was relevant.

This was not however done in Directive 337/5, which established Cedefop and laid down that one of its tasks should be: "to encourage and support any initiative likely to facilitate a concerted approach to vocational-training problems. The Centre's activity in this respect shall deal in particular with the problem of the approximation of standards of vocational training with a view to the mutual recognition of certificates and other documents attesting completion of vocational training."

The Directive thus still referred to the mutual recognition of qualifications and not, in accordance with the Resolution of 4 June 1974, to mutual comparability.

Cedefop made a start on this task in 1978, working in close cooperation with the Commission and the Advisory Committee for Vocational Training (which comprises representatives of employers, workers and governments within the Community). An initial experimental approach, it built on the Advisory Committee's positive response to the Commission's proposal for a common framework for training levels.

The proposal envisaged a division into five levels, namely semi-skilled workers, skilled workers, technicians, higher technicians and graduates, and it was agreed to start with the skilled-worker level in the electrical/electronic, hotel/catering, construction, vehicle repair and agriculture, horticulture and forestry sectors.

These sectors or occupational groups were chosen because:

- they were expected to give rise to a large measure of international mobility,
- they involved large numbers of workers,
- they required sound vocational training before an occupation could be practised,
- they had acquired skilled-worker status within the Member States of the Community.

With regard to occupational requirements it did not matter whether training was provided by employers in a dual system, by colleges in the form of full-time courses or as a combination of the two (alternance training).

The Member States and employer and worker organizations helped Cedefop by designating experts from the five sectors mentioned. With the assistance of the expert groups it was possible to establish comparisons for around 50 occupations in the five sectors before the 1985 Council Decision which forms the basis for this evaluative report.

These interim results helped ensure that, following joint consultation between the Commission, the Advisory

Committee and Cedefop, the Council Decision of July 1985 was developed and adopted unanimously. All Member States endorsed the Decision, which also meant that from now on the aim would be the comparability of qualifications rather than mutual recognition.

At roughly the same time as the events which led to the Council Decision Cedefop was making a thorough study of the state of development of Member States' vocational-training systems. This led to the publication in 1982 of the Cedefop guide, a comprehensive and wide-ranging comparative study which also provided a basis, along with the national monographs, for the discussion in the expert groups under the leadership of Cedefop with the various institutions and agencies involved in the different sectors. Supplementary sector-specific studies were also carried out by Cedefop. With an eye to the development of new technologies these studies came increasingly to focus on the qualitative trends.

3. PURPOSE OF COUNCIL DECISION 85/368 OF 16 JULY 1985

The Decision was of course based on the developments, outlined in the previous chapter, which had taken place up to that time. Its purpose was to initiate a process both at Community level and in individual Member States towards the comparability of qualifications.

The lack of mutual recognition or comparability can block freedom of movement for workers within the Community, since it means that workers seeking employment in another

Member State cannot rely on qualifications they have obtained in their own country. This generally means in turn that they cannot practise their occupation on the same terms in that other Member State as other, non-migrant, workers.

The Decision refers to the comparability of certificates of competence rather than their recognition, since the latter would necessitate a thorough analysis of the training courses leading to their issue. Such an analysis is not a realistic option, given the great diversity of vocational-training systems across the Community. Moreover these systems must be continuously updated in the light of developments resulting from the introduction of new technologies and new concepts of the place of labour in the production process. Such developments imply continuously changing occupational profiles which vocational training must constantly seek to anticipate.

The achievement of mutual recognition would require the detailed regulation of training requirements, which would run counter to the need for flexible responses to changing circumstances in the Community and the Member States.

Since however there is a large measure of comparability among the qualifications which give access to similar occupations in the Member States, job descriptions can be compiled and the associated certificates of competence in the different Member States determined. The purpose of

the Council Decision is to make that process possible in an organized fashion at Community level.

When the job descriptions and the list of certificates of competence are drawn up, firms, workers and public authorities in the different Member States will have this valuable information on all occupations practised in the Community's Member States.

This will help workers to assess the value of their qualifications and to use them in planning their careers on the European labour market, while employers will be enabled to build up a picture of the knowledge and skills possessed by the holder of a particular qualification.

Moreover this approach can also help bring about a gradual approximation of the various training standards and thus to a more coordinated vocational-training policy as mentioned in Article 128 of the Treaty of Rome.

The Council Decision is not intended to lead to the legal recognition of qualifications etc. This is needed only in the case of regulated occupations, i.e. those which, under Member States' law, may be practised only by persons holding specific qualifications showing that they possess the necessary knowledge and skills. These are mostly occupations in respect of which the governments of Member States have a duty to protect the public interest (public order, security, health). This need is met by Council Directive 89/48 of 21 December 1988, which lays down a

general system for the recognition of higher diplomas awarded on completion of professional education and training of at least three years' duration. Directive 89/48 does not cover all the regulated occupations, and a second Directive has therefore been proposed to cover the remainder.

While these Directives are outside the scope of this report, it is worth noting that both the first Directive on a general system and the second Directive, when it comes, can only be of value if they are founded on activities similar to those needed in connection with the comparability of qualifications in pursuance of the Decision of 16 July 1985.

4. CEDEFOP'S APPROACH

The Council Decision of 16 July 1985 laid down with some precision how the work associated with the comparability of qualifications was to be carried out. It must focus first and foremost on the occupational qualifications of skilled workers, and the occupations or groups of occupations (sectors) to be tackled must be selected by Member States and the Commission in mutual consultation.

The starting point for the work is the structure of training levels drawn up by the Commission with the help of the Advisory Committee for Vocational Training. This structure was presented in the report of the Economic and Social Committee of 14 and 15 December 1983 as a common frame of reference and comprises a description of the

training levels.

The definition of the skilled-worker level mentioned in the Council Decision (level 2) includes the following points:

- the person concerned must be fully qualified to engage in a specific activity, with the capacity to use the relevant instruments and techniques;
- the activity must involve chiefly the performance of work which may be independent within the limits of the relevant techniques.

The Council Decision also clearly states who is to do what. The Commission has the job of implementing the Decision, with technical assistance from Cedefop.

The Commission is required to undertake the work in close cooperation with the Member States, which were asked to designate national coordinators or coordinating bodies with which the Commission can consult regularly on matters relating to planning, progress and evaluation. The national coordinating bodies also has the job of ensuring, in collaboration with worker and employer organizations and the occupational sectors concerned, adequate dissemination at national level of the results of the work.

Work could not start until the first occupations or occupational groups had been designated, and the Commission made its selection in consultation with the

national coordinators and Community-level representatives of worker and employer organizations. Since some experience had been built up on an experimental basis in five sectors (electrical/electronic, hotel/catering, construction, agriculture/horticulture/forestry and vehicle repair), these were designated as the first focus of attention.

For each occupation the work was to culminate in:

1. a description at Community level of practical occupational requirements;
2. a comparative table of the various types of vocational qualification issued in each Member State.

The Community-level description of job requirements was to comprise four elements:

- a. in respect of the occupation: the determination of the Community title of each occupation in the sector and its SEDOC classification code where the occupation was included in the SEDOC register;
- b. in respect of the occupational field: a general description of the type of work involved and the manner in which it is to be performed;
- c. in respect of the work: a limitative summary of the specific tasks to be performed by the skilled worker;
- d. other points: here a Member State may include any special features which are specific to that Member State.

The comparative table of vocational qualifications issued

in each Member State must include the following information, to be supplied by the Member State:

1. the Community title of each occupation in the various EC languages and its SEDOC code where it is included in the SEDOC register;
2. features specific to each Member State;
3. the national classification code, where relevant;
4. the national occupational title;
5. titles of the qualifications issued in each Member State to those successfully completing officially recognized or authorized courses;
6. a list of institutions offering courses;
7. the institutions competent to issue diplomas, certificates etc.

To help with its share of the overall task Cedefop has made use, for each sector, of working parties comprising three experts from each Member State representing worker and employer organizations and government. These expert groups play a central role in the work of establishing the comparability of qualifications. Cedefop convenes a group once it has developed a draft of the Community-level description of practical occupational requirements; to this end it makes a preparatory study on the basis of an analysis of the skill requirements (and trends in this area) at Member State level. The working parties operate under the leadership of Cedefop, which also provides their secretariat.

The working parties are assisted by experts in terminology

who have built up a unique expertise and can very quickly provide the working parties, during their meetings, with information in their own language on the significance of a particular title or terminology; for this purpose they make use of a glossary and laptop computers.

The results at which the working parties arrive during their meetings are also developed and immediately made available to the working parties in their own language. The terminology experts work in language groups so that they can communicate with one another quickly regarding definitions.

The work is highly technical: the working parties need to be fully aware of the content of the various jobs in the sector concerned and must seek to reach agreement on job descriptions. This requires considerable patience, tact, procedural discipline, flexibility, creativity and above all experience of the occupational field in question.

Since the working parties are very efficient two or three meetings generally suffice; Cedefop can then compile a report incorporating the results of each party's work. This is forwarded to the Commission, which initiates a verification procedure.

Under the Council Decision Community descriptions of practical occupational requirements or job descriptions must be checked, approved and adopted by the Member States in mutual agreement. This is done at a special meeting

of Member State representatives called by the Commission. The Member States have sixty days in which to submit their comments. The results can then be published in the Community's Official Journal.

5. RESULTS TO DATE

Even though, as the previous chapter noted, the Council Decision sets out in some detail the procedures to be followed and the matters to be considered, it could not be said that the exercise has gone without a hitch.

The question of the comparability of qualifications has been continually in the political spotlight and doubt has been continually expressed as to whether the work could be completed within the time limit set (by the end of 1992). This has produced calls on all sides for the work to be accelerated, with heavy pressure on the bodies doing the work to expedite matters. This has been coupled with great uncertainty as to whether the decision-making authorities might not take another route than that of the 1985 Council Decision, thus delaying the decisions needed for implementation.

Mutually reinforcing processes of this type can only be arrested if a strong and self-confident policy is pursued, but since this was sadly not the case hesitations and criticisms continued and work which needed to be done was not done. No one likes to discover that they have been wasting their time. A simple example of the effects of indecisive, wait-and-see attitudes is that the results

relating to the comparability of qualifications in the first two sectors (vehicle repairs and hotel/catering) were not published in the Official Journal of the European Communities until July 1989 even though Cedefop had already completed the technical work on several sectors by the end of 1987.

The views taken in the Member States on the list of the various occupational groups to be examined sector by sector also proved to differ widely, necessitating time-consuming compromises. The eventual result was the compilation of the following list of nineteen sectors:

Sector	Number of occupations
1. Hotel and catering	8
2. Motor vehicle repairs	9
3. Construction	13
4. Electricity/electronics	10
5. Agriculture/horticulture/forestry	26
6. Textiles - clothing	9
7. Textiles - industry	22
8. Metalworking	20
9. Office/administration	6
10. Chemical	7
11. Commerce	6
12. Transport	9
13. Agro-foodstuffs and food-processing occupations	12
14. Tourism	5
15. Public works	11

16. Printing	(12)
17. Woodworking	(7)
18. Iron and steel	(5)
19. Leatherworking	(6)

(The figures for the numbers of occupations in the last four sectors are shown in brackets as they are Cedefop estimates on which the relevant working party has yet to take a position.)

Not until this had happened could Cedefop start planning its work properly.

Of the sectors listed the first eight (with a total of 118 occupations) had been fully covered, up to publication in the Official Journal, by 5 December 1991. Work on the next three sectors (19 occupations) had reached the pre-publication stage, and the final reports on sectors 12 (transport) and 13 (agro-foodstuffs and food-processing occupations) (21 occupations) had been drawn up in nine languages. This means that Cedefop had completed its task in respect of 13 sectors and 157 occupations by the end of 1991 and that occupational profiles had already been settled for a further two sectors and 16 occupations. The work relating to the remaining four sectors is at different stages of completion, ranging from the preliminary listing of selected occupations to the dispatch of invitations to experts to participate in the first meeting of the working party.

In addition a model has been developed to standardize information in the Member States on the results of the work, since freedom of movement is not possible unless both job-seekers and employers have access to all the necessary information.

While the dissemination in the Member States of the results for the first eight sectors did not get properly under way until late 1991, the initial impression is that they are already being used by employers, workers and intermediary organizations. This is happening on only a modest scale, however, since their existence is not yet widely known - familiarizing a wide public with the system requires repetition of the information, and that will inevitably take time.

The Commission has also asked Member States to draw up an evaluation report on the basis of a questionnaire.

The country reports so far available concur with the national coordinating bodies in finding that it is generally still too soon to reach final judgements on the programme's practical contribution to freedom of movement for workers. Even so it is widely thought that the results will in any event remove certain obstacles to freedom of movement.

A widely reported and very important side-effect has been that both mutual knowledge and interest in Member States' vocational-training systems have increased. In some

cases this has resulted in spontaneous exchanges to consider whether programmes or sections of programmes could be exchanged, and in the metalworking sector cooperation between the Netherlands and Germany has led to the issue of double certificates comprising both the German Facharbeiterbrief and the Dutch apprenticeship diploma. These double certificates are particularly useful in border areas, in that they make access to the labour market on the other side of the border much easier.

A frequently voiced criticism is that the occupational descriptions are mostly still too general, too academic and too little geared to employers' individual needs. The European occupational descriptions that have been developed are said by such critics not to be found anywhere in practice. One way of improving the situation would be to divide the sectors into subsectors in which specific occupational profiles would be compiled.

Another general complaint is that the restriction of the programme to level 2 makes it too narrow, in that many occupations that have arisen as a result of technological development in recent decades could be classed as either level 2 or level 3; nor are the boundaries between levels 1 and 2 easy to define with precision. One Member State has even suggested that all levels should be tackled simultaneously within each sector, since this would bring out their interdependence and have the incidental advantage of facilitating career planning. A related suggestion is that the occupational profiles should be

analysed into competence modules, thereby facilitating career planning across different occupations.

A further widely voiced complaint is that Member States' experts on the working parties had too little time before their first meetings to discuss the occupational profiles drafted by Cedefop with the groups they represented. In many Member States it has proved difficult to convene a representative body for consultative purposes in each sector; this reflects the sectors' often complex organizational structure in the different Member States.

The regular updating of the occupational descriptions or profiles has been widely urged.

Finally, it has been urged that the lists of qualifications associated with occupational profiles should not only show the skills to which each qualification relates but that a method should also be found of indicating individuals' occupational experience. In this connection reference has been made to the European vocational-training pass mentioned in the Council Decision.

In general it is felt that the work should be continued and extended but with a review of the methodology so far used; virtually all responses indicate that a method of describing practical occupational requirements, such as has so far been used, provides a sound basis for the more thoroughgoing approach that is deemed desirable.

6. ACHIEVING THE GOALS BEFORE THE END OF 1992

The situation in the nineteen designated sectors outlined in the previous chapter at least gives an indication of the progress being made in implementing the Council Decision of July 1985. One of the Decision's main purposes was to promote freedom of movement for workers by the end of 1992, however, and to assess how close we are to achieving that goal we need information on the total number of workers in all nineteen sectors and the number of workers in those for which work has been completed.

The guidelines for the compilation of national evaluative reports on the comparability system which were included with the notes for the national coordinating bodies issued by the Commission include under III 2 a question on the number of workers in the sectors in respect of which work has been completed (up to and including publication in the Official Journal); unfortunately no question on all nineteen sectors was included, so this information is not given in the Member States' evaluative reports. Even had this been done, we could not give the result in this report since not all the evaluative reports were available at the time of writing. No general indication can therefore be given of the actual or likely effect of the programme on freedom of movement for workers in the Community.

These data are available for the Netherlands, however, and while the Dutch position is clearly not typical of the Community as a whole it offers some indication of the

effect of the work so far completed. In the Netherlands a total of 3 581 000 people work in the nineteen sectors, of whom 1 335 000 work in the eight sectors for which the results have already been published in the Official Journal and a further 1 472 000 in the three sectors for which publication was in preparation at the end of 1991. The final report on sectors 12 and 13, in which 516 000 people work in the Netherlands, is ready in the nine Community languages.

Taking these sectors together, we see that Cedefop has completed its task for the occupations of 3 323 000 workers, or around 93% of the total in the nineteen sectors designated under the Council Decision of 16 July 1985. This is at all events a decent result, indicating that a 100% score should be easily attainable by the end of 1992.

In connection with these figures it must be borne in mind that they relate only to skilled workers (level 2) and do not yet cover e.g. the large numbers of people working in telecommunications, the caring occupations and so on.

We can therefore conclude that by the end of 1992, despite all the difficulties encountered in this problematic field a large proportion of European workers will have at their disposal:

1. Community-level descriptions of practical occupational requirements in around 200 occupations, and
2. comparative tables of the diplomas, certificates and

other evidence of formal qualifications issued in each Member State.

The question is of course whether this is enough to allow us to speak of the elimination of obstacles to freedom of movement for workers in the European Community - and the answer, regrettably, must be "no". Levels 1, 3, 4 and 5 have yet to be tackled, and it is by no means clear that the designated nineteen sectors in respect of which work should be completed by the end of 1992 cover all possible occupational groups at level 2. Another reason to query the programme's coverage is the rate of technological change, which has produced many new sectors of activity. It is therefore regrettable that the work now approaching its completion was not completed some years earlier. We would then have the opportunity of improving the system, updating existing occupations and tackling new sectors and different levels.

It was argued above that unclarities and hesitations as to whether this was the right approach have caused huge delays. Too much time was wasted between the completion of the technical work, its verification by the Member States and publication in the Official Journal. However, if the figures for the Netherlands given in this chapter are at all representative of Europe as a whole, then we can see that while the objectives may not have been achieved in full they have been achieved for a very considerable proportion of Europe's working population.

7. CONCLUSIONS AND RECOMMENDATIONS

Neither the Treaty of Rome nor the Single European Act requires the adoption of directives on the mutual recognition of diplomas, certificates and other evidence of formal qualifications in respect of employees; it is however required in respect of the practitioners of other professions.

At the start of the European Community it was thought that Article 48 would suffice, since it states that freedom of movement for workers must be achieved at the latest by the end of the transitional period within the Community and that this requires the removal of all discrimination based on nationality between workers of the Member States as regards employment, remuneration and other conditions of work and employment.

The recognition or non-recognition of diplomas showing the holder to possess certain skills quickly emerged as a possible obstacle to freedom of movement. It was believed that the question of freedom of movement for employees was best tackled through what was then a fairly static system of vocational education. However, it was also clear that vocational education in the Member States was rooted in their national cultures, just as general education was, and that the content of vocational education across the Community would not be harmonized as an automatic result of closer economic cooperation. The converse - the idea that a common vocational-training policy could contribute to the harmonious development of

national economies and the common market - also proved unrealistic.

That common vocational-training policy, under Article 128 of the Treaty of Rome, was able to be formulated only in the most general terms, and while a more detailed harmonization of the content of vocational training across the Community would undoubtedly have facilitated the mutual recognition of qualifications, the detailed definition of training content at Community level would have produced rigidity and lessened the training system's capacity to respond to technological development.

The objective was therefore shifted from mutual recognition to comparability, under the assumption that, broadly speaking, the requirements of an occupation could be formulated in terms of an occupational profile.

Recognition is necessary in those cases where the legal position must be watertight, as in the case of the regulated professions which can be exercised in the Member States only if the practitioner holds a statutory certificate of competence.

Comparability requires the description in profile form of each occupation and the listing of the associated certificates of competence issued in the Member States. Provided the system is effectively publicized and explained, this promotes clarity as to the types and levels of knowledge and skill to which particular

certificates attest. In turn, this clarity helps workers to exercise their right to freedom of movement and practise their occupation in another Member State under the same conditions as that State's nationals.

Mutual recognition and comparability cannot be ranked in order of value. Both are of equal utility:

- as instruments of career planning,
- in relation to further study elsewhere in the Community,
- as ways of advancing the harmonization of the content of vocational training,
- as contributions to the more harmonious development of the economies of Member States and the Community as a whole;
- as ways of building a Europe capable of competing with Japan and the United States in a high-tech world.

In this way the first objective of the Council Decision of 16 July 1985, freedom of movement for workers, can be extended to a second goal related to the objectives defined in Article 128 of the Treaty of Rome. The work whose formal start was marked by the 1985 Council Decision is to be continued, in adapted form, since not all occupations occurring in Europe have yet been compared. It must also be continued because it has become clear that it generates important basic material needed to help Europe's vocational-training systems grow together. It is also important that the results obtained be continuously updated in line with developments, both those which have already occurred and those which will

undoubtedly occur in the future.

One approach to the process of continuous updating could be through the establishment as proposed in the Dutch evaluation report of a European Council on Vocational Qualifications, on the lines of the UK National Council on Vocational Qualifications. This would be an independent European body that would, in return for payment, indicate the value of qualifications already compared elsewhere.

The Netherlands is working on a feasibility study and will put forward suitable proposals should such an approach prove practicable. Since such a body would need to make use of the studies carried out by Cedefop through the working parties close links with Cedefop are highly desirable.

Our recommendations can be summarized as follows:

- The development of occupational profiles at Community level as undertaken by Cedefop would appear to be the only logical way of building up the basic information needed to compare qualifications.
- The involvement of worker and employer organizations in the sectoral working parties is essential, since comparisons need to be based on the vocational profiles actually encountered in practice.
- The working parties need to have at least semi-official status and to meet at least every two years under the auspices of Cedefop in order to:
 - . update vocational profiles in line with developments,

- . exchange experiences,
 - . prepare for the extension of the system to levels 1, 3, 4 and 5,
 - . develop proposals to enhance the transparency of the system through supplementary measures.
- A study should be initiated into the feasibility of establishing a European Council on Vocational Qualifications with the job of validating the results of comparison/recognition exercises and of providing information to interested persons. The Council would need to be an independent, self-financing, non-profit body; representation on it of employer and worker organization would be vital.
 - The results of the activities of the working parties constitute the basic data for such a Council, and indeed the working parties could well form its executive arm.
 - The results of comparing qualifications need to be related to other Commission activities (Petra, Lingua); extension to other sectors and levels is an urgent necessity.
 - Research into the development of European modules is highly desirable. This would facilitate both personal career planning (in that comparable modules for different occupations could be combined) and a flexible response to trends and changes in national and Community labour markets.
 - individuals' ability to do particular jobs depends on their experience as well as their formal qualifications, and credits need to be given for both work experience and the completion of study modules.

- All these recommendations are intended as an aid, as and when the opportunity arises, to the formulation of European standards for final qualifications. It will then be possible to start the process of translating occupational profiles into training profiles.
- Work on the comparability of qualifications must also make use of experience built up in this area by multinational corporations and in border regions where workers can use their qualifications in more than one country.
- Comparability and transparency can be enhanced through user-friendly information systems, and the scope for using a system like the French Minitel for disseminating information on comparabilities needs to be studied. Systems like Minitel, which offers a vast range of information through the telephone system using modems and computers or special terminals, are now being developed in other European countries. Highly user-friendly and accessible to a very wide public, such a system is ideally suited to transmitting information on the comparability of vocational qualifications.

IN CONCLUSION

As we have seen, progress towards comparability has not been easy. While not all aspects are satisfactory, it is nevertheless clear that the foundations have been laid for the comparison of qualifications gained by workers in the different Member States. Such comparability in turn widens the scope for a more Europe-wide exploitation of talents and skills. This is of course in the interest of

individuals, who thereby have their opportunities to live and work anywhere in the Community enlarged. It is also in the interest of the Community itself, since in the competitive world in which we live it is vital that the fullest use be made of all the diverse talents of Europe's citizens.

The comparability of vocational qualifications is thus in my view of great importance to the Europe of tomorrow.

In arriving where we are now we have met many disappointments on the way and our confidence in future success has often been tested; indeed, there have often been doubts as to whether we would win the race against the clock as it ticks away the minutes until the end of 1992. That race is largely won, however, and the comparability of vocational qualifications is a major reinforcement of the foundations of a united Europe. Many more such reinforcements will even so be needed.