

Chapter 2

The Copenhagen Process: A Political Economy Perspective

In this chapter, I will develop a political economy perspective on the Copenhagen process. In order to understand the origins of the Copenhagen process, I will begin with providing a short overview on the main initiatives of European cooperation in the field of VET. I will then turn to analysing the instruments and principles and the governance of the Copenhagen process. In a final step, I will analyse the Copenhagen process against the background of VoC. In this final section, I will show that it is biased towards LME VET regimes, and therefore has a potentially more far-reaching impact on CMEs than LMEs. It seems that countries with school-based VET systems are, however, less impacted than countries relying mainly on dual apprenticeships. There is scope left to the member states regarding the concrete implementation of the different instruments and principles, so that the degree of the impact can be influenced by member states.

2.1 A Brief History of European Vocational Education and Training Policies

In order to understand the Copenhagen process, it is important to understand how it came about. Rather than giving a detailed and comprehensive overview on the development of the European dimension of VET policies, this chapter aims at providing a brief overview on the topic by distinguishing four different strategies for policy-making on the European level: harmonisation, equivalencies, recognition, and intergovernmental coordination. There were times in which several of these strategies were pursued simultaneously. Several processes and strategies also continued in parallel to the Copenhagen process.

A European dimension of education and training was already established with the creation of the European Coal and Steel Community (ECSC) in 1953 and the European Economic Community (EEC) in 1957. In these early days of European

cooperation, the focus has been on those aspects of VET that are related to the freedom of movement and to competition (Hantrais 2007: 47). The EEC Treaty included objectives such as the coordination of activities in the field of VET (art. 41), recognition of qualifications and diplomas (art. 57), cooperation in technical and further education (art. 57) as well as the support of exchange programmes in education and employment (art. 50) (Powell and Trampusch 2011). Article 128 called for the establishment of “general principles for the implementation of a common policy of occupational training capable of contributing to the harmonious development both of national economies and of the Common Market”. The Council of the European Economic Communities (1963) formulated these general principles which remained on an abstract level and focused on economic needs, such as adapting the skills of the workforce to changes in the economy and production technologies. Several activities were launched later, including facilitating employability and re-training with the help of the ESF.

Four Strategies: Harmonisation, Cooperation, Equivalencies, Recognition

A first strategy that can be identified is harmonisation. The general principles on VET laid down by the Council in 1963 clearly stated that “the common vocational training policy must, in particular, be so framed as to enable levels of training to be harmonised progressively” (ibid, eighth principle). However, after the principles were passed, progress was slow (Milner 1998). Countries’ preferences diverged: It was especially France that promoted the harmonisation of social policies because it feared that competitive disadvantages might result from its high social charges on employment (Hantrais 2007: 28–29). This objective was opposed by other countries, such as the United Kingdom and Germany (ibid). In the negotiations, the UK regarded social policy regulation as a threat to competitiveness. Germany argued that competitiveness is not only determined by labour costs but rather by a balance between labour costs and other factors such as taxes, labour productivity or labour relations—and this balance might be disrupted by Europeanising social policies (ibid). Southern European countries feared the costs of increasing social standards and Sweden a decrease of their social policy regulations (ibid). Because of these diverging preferences, agreement on harmonisation of social and education policies could not be found.

Still, efforts to expand the European dimension on VET continued. The Council of Ministers intensified cooperation in the 1970s and established a first VET action programme in 1971 (Powell and Trampusch 2011: 288). The Directorate General for Research, Science and Education was founded. The 1973 Janne Report called for a common European policy on education on the basis of closely linking education policies to economic policies (ibid). In 1975, the European Centre for the Development of Vocational Training (Cedefop) was founded. In 1981, the Eurydice education information network and its data bank on education and training followed. Disagreements on the degree of harmonisation continued and member states opposed several initiatives on harmonisation stemming from the European level (Jakobi 2009: 89).

The focus of European VET policies—such as social policies in general—shifted from harmonisation to cooperation and subsidiarity (Hantrais 2007: 54). Upon the initiative of Jacques Delors, the Single European Act in 1986 for the first time acknowledged divergences in social policy regulation on the member state level and opted for “coherence” instead of harmonisation (Hantrais 2007: 29–30). The document, however, also underlined the importance of social and economic cohesion and herewith of a European dimension of education (*ibid*, 5–7). In 1989 the European Commission (1989: 4) underlined this focus on cooperation: “Blanket harmonisation or standardization of the educational systems is entirely undesirable; it is not the Commission’s objective in this field.” Instead, the objectives of policies in education and training were seen to enhance cooperation, information and contact as well as policy learning. In the words of the European Commission (1991: 10): “Whilst the Community will need to allow for significant differences between Member States in the ways of acquiring qualifications and the various ways of validating competences acquired in the labour market, it will also need to encourage European-level cooperation to ensure progress in defining the problems and the methods for tackling them”. This approach can be described as a “forward-looking conception of subsidiarity, based not only on normative distinctions between areas of competence but rather on interaction between Community and national policies” (European Commission 1991: §48). Three principles are decisive: The co-ordination of policies on the basis of general principles and action programmes (§46); the convergence of initiatives on the basis of a framework of common objectives laid out by Council (*ibid*); and transnational cooperation. In sum, while the approach of cooperation and subsidiarity leaves ample scope for action to the member states, it also foresees a certain degree of convergence of activities and objectives.

An important European cooperation activity—which does not impact national systems directly—is the exchange of young people, teachers, apprentices and students. Programmes were launched on the basis of the 1976 Education Action Programme (Council of the European Communities 1976) and put in practice at a time when the Community gained momentum by actions such as the Single European Act (European Commission 1993a). Different programmes exist that are targeted towards different groups and each has specific motivations. For the field of VET, LEONARDO DA VINCI is the most important programme, aiming at placing 150,000 VET students between 2005 and 2013.

From the mid-1980s onwards, partly in parallel to the above described shift from harmonisation to cooperation, a new strategy gained in importance: establishing “equivalencies” by comparing individual occupations. In a first sectoral approach, the Council decided on lists of equivalent qualifications in 1974. A decision of the Council of the European Communities (1985a) then defined practical job descriptions and identified corresponding qualifications in other member states. The decision moreover laid down a specific procedure: upon proposals of member states, employers or worker organisations, the Commission prepares mutually agreed-upon job descriptions and then matches them to nationally recognised training qualifications (*ibid*, article 3). However, this procedure is complex, and

equivalencies established in the process were not accepted widely (Hanf 2012). From the perspective of an interview partner at the European level, the problem was that efforts to establish comparisons did not take into account institutional and structural differences (interview EU_PUBL-4). In the end, the procedure was stopped in 1992 (*ibid*).

A strategy that proved to be longer-lasting was the strategy of recognition. The process culminated in the Recognition Directive (European Parliament and Council 2005). The importance of recognising qualifications for implementing the freedom of movement had been acknowledged very early, and already in 1963 the Council laid the foundation for recognition policies (Council of the European Economic Communities 1963: eight principle). In spite of these early activities, the European Commission (1989: 7) perceives the recognition of qualifications as a “field where for years it had proved difficult to make progress”. In order to fully and formally recognise occupations across countries, a legal framework on the European level was established on a sectoral basis, covering a variety of branches.¹ These recognition directives aimed at recognising pathways of learning and certificates (Powell and Trampusch 2011). In some branches and occupations, as for example health professions, practices proved too complex for such a sectoral approach. For these cases, directives were issued to coordinate training and to provide recognition of diplomas and qualifications (Hantrais 2007: 55).² Once the occupation or industry was covered, professionals were allowed to establish themselves in any other member state when fulfilling the other member state’s requirements. In some cases, adaptation periods or aptitude tests were required (*ibid*, 56). The Council adopted two directives on the recognition of professional education and training that did not deal with specific occupations: The 1989 directive covered higher education diplomas and diplomas of training of at least 3 years (Council of the European Communities 1989) and the 1992 directive extended this approach to other post-secondary qualifications and training courses (Council of the European Communities 1992). The 1989 directive was considered “a very important step forward” (European Commission 1991: §54). The two directives were complemented by Directive 2005/36/EC, which consolidated sectoral directives and general system directives (Hantrais 2007: 56). The objective was to facilitate the provision of regulated services that depend on acquiring appropriate competencies and qualifications (*ibid*). The general recognition system provides recognition depending on the migrant’s level of qualifications—which has to be at the same level or one level below the level of qualifications that is required by the host country.

In spite of this progress on recognition, the approach boasts several problems. Establishing recognition on the European level is a complex and time-consuming process: For example, it took 18 years to install a framework for architects and

¹For an overview, see Annex A of the Council Directive 92/51/EEC (Council of the European Communities 1992).

²See for example Council of the European Communities (1977, 1980, 1985b).

16 years for pharmacists (Gordon 1999: 204; see also European Commission 1989). Because of the distinctiveness of national VET systems, complex methodological and legal issues are involved (Powell and Trampusch 2011). Moreover, concrete decisions on recognition were subject to criticism. For example, training in firms was classified below school-based VET—which led to sincere criticism from Germany (ibid). Most importantly, in practice recognition affected firms' recruitment strategies only to a very limited degree. In conclusion, efficiency and effectiveness are enduring problems in establishing recognition procedures across member states.

With the influential “Memorandum on Vocational Training in the European Community in the 1990s”, the European Commission (1991) consolidated European VET policies towards a “Europe of training” (ibid, 94). Based on a broad discussion on Community and member state level, the purpose of the memorandum was to steer debate on the topic. In a way, the memorandum foresaw the governance mode of intergovernmental cooperation: “Community action on training has two strands: setting common objectives to be pursued by Member States and identifying objectives and actions to be pursued by the Community to support and complement national policies” (ibid, 5). Harmonisation is explicitly excluded.

Intergovernmental Coordination: The Open Method of Coordination (OMC)

The balance between the four strategies—harmonisation, cooperation, equivalencies, and recognition—changed substantially with the Treaty of Maastricht in 1992. In the view of Powell and Trampusch (2011), Maastricht constitutes a “watershed event” for EU VET policies. The Treaty banned harmonisation and prioritised subsidiarity. The powers of the European Union were strengthened by introducing the co-decision procedure of article 251 TEU for education policies and by strengthening the OMC.

Using the OMC as a governance tool in the areas of social, employment and education policies stems from the diverging nature of national welfare systems as well as diverging national preferences on the level of social protection (Hantrais 2007). The OMC is characterised by four elements (Schäfer 2006): first, the Council issues guidelines and a timeline for their implementation. Best practices and mutual learning shall, second, be based on quantitative and qualitative indicators which facilitate comparisons. Third, national governments implement the European guidelines on the basis of action plans. As a final step, mutual assessment and monitoring of national reform programmes take place with the help of reports drawn by the Commission. These reports also aim at supporting the advancement of the guidelines. The Commission proposes new guidelines, which are adopted by the Council after hearings by the European Parliament, the Economic and Social Committee and the Committee of the Regions. Moreover, the Council can issue concrete recommendations to individual member states with a qualified majority (Ostheim and Zohlnhöfer 2004: 378). While the OMCs are soft law procedures, meaning that sanctions do not exist, the rationale of the method is still to put pressure on member states, and to advance national developments by sharing best practices, increasing transparency and comparability across countries.

Such new forms of coordination on the European level also included questions related to VET. The importance of education and training policies on the European level was strengthened by understanding them as a central component of employment policies. Commission papers such as the white paper on “growth, competitiveness and employment” linked employment issues to broader economic strategy and emphasised the need of a pro-active education and training policy (European Commission 1993b). As a follow-up to the provisions of the Treaty of Amsterdam which required member states to work together on a coordinated employment strategy (article 125), in 1997 the Luxembourg European Council launched the European Employment Strategy (also called “Luxembourg process”). The working procedure developed into a slightly modified form of an OMC (Ostheim and Zohlnhöfer 2004: 377). Questions of employability, lifelong learning, transitions from school to work and youth unemployment constituted central aspects (European Commission 2001a: 24; Ostheim and Zohlnhöfer 2004: 380; Hantrais 2007: 53).

Against the background of the different strategies that I have previously distinguished, the principle of cooperation was strengthened over time and is conducted in a more coordinated form with the Treaty of Maastricht and the subsequently introduced OMC. While the strategy of advancing recognition was still advanced in parallel by the Directorate-General for Internal Market and Services, the strategy of equivalencies was no longer pursued and harmonisation was banned by the Maastricht Treaty. After Maastricht, the Commission continued to play an active role—not for working towards harmonisation but as a steering actor for soft law.

Lisbon and Beyond

With the launching of the Lisbon strategy in 2000, a “transformation” (Powell and Trampusch 2011: 284) took place. The Lisbon strategy aims at making Europe the “most competitive and dynamic knowledge-based economy in the world capable of sustainable economic growth with more and better jobs and greater social cohesion” (European Council 2000). Education and training became central policy fields to reach this objective: “Vocational education and training have a vital role to play in reaching the Lisbon goals, in terms of providing people with the competences and qualifications, which respond to the rapidly evolving needs of the modern labour market. The diversity and specificity of vocational education and training systems and provisions in Europe present particular challenges in relation to transparency, quality and recognition of competences and qualifications. In particular, levels of mobility (...) remain low in relation to those in higher education” (Council of the European Union and European Commission 2004: 5). Concrete targets were identified, among others increasing human resource investments, which reduced the number of young people who attained only lower-secondary education and do not take part in further education or training by half, and identified a common European format for the *curricula vitae*. The Lisbon Council highly influenced the development of European VET policies: “From Lisbon onwards, Community education and training policy has gained a dynamic hitherto unknown. (...). For the first time, substantial political cooperation is taking place at European

level in these areas, and there is an effort to integrate all initiatives into coherent education and training policies at European and national levels” (European Commission 2004: 5).

Following Lisbon, the heads of state asked the ministers of education to develop an ambitious programme for the modernisation of the education systems with a focus on common priorities and with respect to the diversity of national systems. The work programme “Education and Training 2010” was developed that included objectives for education and training policies as well as procedures for assessing achievements in the framework of the OMC (Council of the European Union 2002b). Objectives were to improve the quality and effectiveness of education and training, facilitating access to education and training systems, and opening up systems to the wider world. The work programme established instruments and tools such as benchmarking on the basis of indicators, best practice, monitoring, evaluation, peer review, exchange of experiences and mutual learning. A standing group on indicators and benchmarks as well as working groups were established (European Commission 2006b: 7). With the work programme, for the first time a common framework for European cooperation was created which was based on the idea to improve national education and training systems with the support of EU principles and instruments as well as with exchanges among countries (Van der Sanden et al. 2012).

In addition to the detailed draft programme, education ministers and the Commission set five goals (European Commission 2002: 4): (1) Making education and training in Europe a worldwide reference for quality and relevance of its educational institutions; (2) Making systems compatible and therefore allow citizens to move between them; (3) Effectively validating qualifications, knowledge and skills throughout the Union; (4) Providing citizens of all ages access to learning; and (5) Being open to cooperation with other regions in the world and becoming the most-favoured destination for students, scholars and researchers. While efforts on the programme continued in parallel to the Copenhagen process, the ambitious programme could not completely fulfil its objectives (see for example Van der Sanden et al. 2012: 77). In 2009, the “Education and Training 2020” strategy was launched as a follow-up. Its four strategic objectives are: (1) Improving the quality and efficiency of education and training; (2) Making lifelong learning a reality; (3) Promoting equity, social cohesion and active citizenship; and (4) Enhancing creativity and innovation, including entrepreneurship, at all levels of education and training.

2.2 The Copenhagen Process

The process of enhanced cooperation in VET launched in November 2002 with the Copenhagen Declaration marks a new phase of European cooperation in VET. 33 countries—EU member states, candidate countries and the European Economic Area/European Free Trade Association countries—as well as the European



Fig. 2.1 Priorities for VET under the Copenhagen process. *Source:* Cedefop (2010a: 19)

Commission take part in the process. With Copenhagen, a set of priorities for European cooperation in VET is defined (see Fig. 2.1). Most importantly, the Copenhagen process aims at increasing mobility, transparency, and quality of VET across Europe (interview EU_PUBL-4). The declaration stresses that

cooperation is voluntary in nature (Council of the European Union 2002a): The instruments, guidelines and principles are ‘soft law’, meaning they are not legally binding and no sanctions are available for non-compliance or non-achievement of objectives.

The “Maastricht Communiqué on the Future Priorities of Enhanced European Cooperation in Vocational Education and Training (VET)” reviewed the Copenhagen Declaration in 2004. Countries agreed to work not only on European objectives, but also on national priorities. At Maastricht, priorities were fine-tuned, the main framework for 2004–2010 was developed, and the Communiqué gave a mandate to develop the ECVET and the EQF. The 2006 Helsinki communiqué consolidated the process. A deadline was set to implement instruments and principles by 2010. The importance of the instruments and principles was reaffirmed with the Bordeaux communiqué in 2008, together with a first assessment of the effects of the economic crisis on VET. The 2010 Bruges Communiqué aligned the Copenhagen process closer with the general working programme on Education and Training 2020, which in turn is closely attached to the Europe 2020 strategy.

Much of the work on the process has been accomplished in different working groups on the European level. During the course of the process, working groups have been established for EQF, ECVET, EQARF (see below for details on the different instruments), and for the validation of non-formal and informal learning. Members of these working groups include national governments, social partners, higher education representatives and education providers. Peer learning activities and sharing best practices are fostered within the working groups.

Instruments and Principles

In this section, I will look in more detail at the instruments and principles which were developed within the Copenhagen process. Although each of the instruments and principles has its own objective and purpose, they are related to each other, and hence “need to be integrated and implemented coherently” (Cedefop 2010a: 26).

Learning Outcomes

The focus on learning outcomes is a central and important aspect of the Copenhagen process. As an interview partner (EU_PUBL-4) reports, Cedefop already worked on the concept at the end of the 1990s. The idea to focus on learning outcomes also resulted from experiences with the strategy of comparing qualifications based on learning input—a strategy which ultimately failed and was stopped in 1992 (see Sect. 2.1). The concept became increasingly important after 2000 and with the Commission’s Communication on lifelong learning (European Commission 2001b). Learning outcomes are closely related to—or even a necessary prerequisite of—qualifications frameworks, credit systems and the validation of non-formal and informal learning. Cedefop (2010a: 26) defines learning outcomes as “statements of what an individual learner knows, is able to do and understand following completion of a learning process.” The concept of learning outcomes focuses on the demand side—instead of ‘learning inputs’ such as the type of institution or the length of an educational programme. Some countries—such as Germany and the Netherlands—refer to learning outcomes as “competences”

(ibid). On the European level, a Learning Outcomes Group has been established that fosters discussions and peer learning.

The possible impact of a shift towards learning outcomes should not be underestimated: Implementing the principle “(...) significantly changes the way objectives are formulated, standards are set and curricula are described and thus influences teaching and learning directly” (Bjornavold and Coles 2007: 205). A shift to learning outcomes moreover has consequences on assessments, teaching methods and learning conditions (Cedefop 2010a). The importance of the principle is underlined by the EQF, which strongly relies on learning outcomes. Yet, the introduction of learning outcomes leaves ample scope for action on member state level. It is still discussed if learning outcomes should be related to tasks only or furthermore include social and personal skills (ibid). An aspect which is perceived differently even within countries or institutions is the question of whether learning outcomes can be understood as “overarching goals of VET” or as “results of a study programme or teaching unit” (ibid, 27; Baethge et al. 2008). Becker and Spötl (2006: 119) believe that in spite of the efforts undertaken by Cedefop, a common understanding of terms such as “qualification”, “skills”, or “competence” is still lacking. This also leaves more scope for action regarding the implementation of European concepts on the national level.

The implementation and use of learning outcomes differs across EU member states. While some countries—such as the UK—had already focused on learning outcomes prior to the Copenhagen process, others—such as the Netherlands—increasingly use outcome approaches, and again other countries were starting to implement first changes in the direction of outcome-based systems in 2010 (Cedefop 2010a: 27). A Cedefop study of nine countries shows that all of these—including my country cases—either already adopted or are adopting reforms of VET curricula towards the use of learning outcomes (ibid, 26). Introducing learning outcomes is, however, a gradual and complex process (ibid, 27).

European Qualifications Framework (EQF)

Already in 1985, shortly after it was set up, Cedefop developed a five-grid qualifications framework that made training levels for VET, tertiary education and employment comparable without providing formal recognition (Coles 2006: 8; Gordon 1999: 204–205). New Zealand was the first country to introduce a NQF in 1990, and soon other countries followed (Jakobi 2009: 112). International organisations such as the International Labour Organisation (since 2000) and the OECD (since 2001) took up the idea of qualifications frameworks and promoted their use (ibid, 8f). On the European level, the agreement to adopt the EQF was reached in 2004 with the Maastricht declaration. Between 2004 and 2005, an expert working group developed the first draft of the instrument. After a discussion on the European level and a revised draft prepared by a technical working group, a public consultation was launched in 2005. After incorporating the results, a revised version of the EQF was drafted in mid-2006. It was only in 2008 that the European Parliament and the Council adopted a recommendation on the EQF. It called upon all member states to take actions to relate their qualifications to the EQF by

2010. By 2012, all certificates and diplomas are expected to include a clear reference to the respective EQF level. The EQF is fully compatible with the Framework of Qualifications of the European Higher Education Area.³ It covers both vocational and general education and comprises eight reference levels (see Annex I). Initially, the EQF had been developed together with ECVET (see below), and the instruments were separated only later on (DGB 2005). As the EQF comprises all strands of education and not only VET, it is no longer governed within the Copenhagen process (interviews EU_PUBL-1, EU_PUBL-5).

The introduction of qualifications frameworks across Europe has a twofold objective. First, the EQF serves as a meta-framework for NQFs and hereby aims at making national qualifications systems more comparable. Cedefop (2010a: 9–10) defines NQFS as follows: “National qualifications frameworks (NQFs) describe what learners should know, understand and be able to do based on a given qualification as well as how learners can move from one qualification to another within a system.” Second, NQFs can unfold change on the national level. Cedefop (2010a: 27) names nine potential objectives for the introduction of NQFs, of which all apply (additionally or solely) to the national realm. NQFs aim at improving the transparency of qualifications, they can moreover facilitate strategic planning, contribute to linking education to labour markets, and serve a basis for wage bargaining (Coles 2006). In the literature, there seems to be a common understanding that the introduction of qualifications frameworks brings about a new understanding of education—or at least has the potential to do so (Bjornavold and Coles 2007: 204; Coles 2006; Gehmlich 2009; Jakobi 2009; Kleibrink 2011). The impact on national education systems can be profound. In the words of Coles (2006: 3): “(...) NQFs can have a deep penetration into the workings of the qualification system. Reform for a wide range of purposes becomes possible as a result of this penetration, for example improving the identification of skills/qualification needs, changing the influence of stakeholders, raising standards, improving quality, improving participation in learning, improving efficiency and changing practice in education and training delivery.” Peter Grootings from the European Training Foundation (ETF) concludes: “Frameworks are potentially a powerful lever for vocational education and training reform within countries (...)” (foreword Grootings to Coles 2006). The impact of qualifications frameworks on national systems has been intended as a means to bring about such changes: “The EQF also has an aim to support and promote change in national systems of qualifications” (Coles 2006: 25); it shall serve as a reform lever on the national level (Bjornavold and Coles 2007: 204). This goal is based on the Lisbon agenda which aimed at enhancing access to lifelong learning by improving permeability as well as advancing the quality of education systems. While this objective to steer national reforms

³The Framework of Qualifications of the European Higher Education Area was developed as part of the Bologna process. It was adopted in 2005 during a meeting of the ministers responsible for higher education from all countries taking part in the process. It encompasses three levels: Bachelor, Master, and Doctor. These correspond to EQF levels six, seven and eight, but in contrast to EQF levels, they systematically build on each other.

has been made clear from the beginning, as an interview partner at the European level argues (interview EU-2), it certainly is less visible and potentially more controversial.

Yet, this is not to say that member states have to subscribe to all objectives the introduction of NQFs *can* have. In spite of the objective of the EQF to serve as a reform lever, it is up to the member states to make use of the instrument for such purpose: “National qualifications frameworks then become reform instruments. These are, and one certainly has to add that too, (...) in the hands of the member states (interview DE_PUBL-2).”⁴

After political agreement had been reached to develop the EQF, member states quickly began to conceptualise NQFs. Cedefop (2010a: 20) concludes that the development of NQFs constitutes “perhaps the clearest evidence of influence” of the Copenhagen process on member states. An interview partner from the Commission (EU_PUBL-1) states: “We (...) hoped that there would be an impact on the national level. To some extent (...) it is going beyond our expectations”. In fact, all countries were in the process of developing NQFs or had done so already (Cedefop 2010b). Those countries in which NQFs had existed prior to the agreement to establish an EQF—such as the UK, Ireland and France—had advanced most regarding the practical implementation in 2010. In contrast, several countries apparently did not share some or all of the objectives (Cedefop 2010a: 27) and other countries seemed to be reluctant to link their NQFs to the EQF (ibid, 28). An interview partner from the European Commission points out that the EQF has not led to change, but rather facilitated change that was needed (interview EU_PUBL-1).

On the EU level, the EQF advisory group was formed in order to support the implementation of the framework and foster coherence and transparency of the referencing process. The group comprises representatives from member states, social partners, civil society organisations, VET organisations, associations representing institutions that award qualifications, the European Commission and Cedefop (interview EU_PUBL-1). In a first step, group members have agreed on criteria for the referencing of qualifications. Subsequently, countries report on their progress and present referencing reports. Member states then receive comments and questions and are asked to take these into account for the final version of national reports. In addition, the group discusses a broad variety of topics such as the validation of non-formal and informal learning or the recognition directive (interview DE_PRIV-1). Peer learning activities take place on a regular basis. Another instrument for exchange of information and best practice are expert workshops in which member states’ representatives discuss experiences regarding the development of NQFs and the referencing process. In general, as the German Ministry of Education and Research (*Bundesministerium für Bildung und Forschung*, BMBF) concludes, the Commission closely monitors the implementation process (BMBF 2012b: 3).

⁴Original: “Die nationalen Qualifikationsrahmen werden dann die Reforminstrumente. Die sind, und das muss man allerdings dann auch sagen, die sind in der Hand der Mitgliedsstaaten.”

In general and independent from European developments, NQFs can take many possible forms and vary in important dimensions. A review from the English Qualifications and Curriculum Authority (QCA) for the ETF shows that while some NQFs focus on vocational education and on improving linkages to the labour market, other NQFs include all sectors of education (Coles 2006: 3).⁵ Yet, although the design of NQFs is characterised by a great variety in principle, within the Copenhagen process the choices of member states are more limited. First, this is because EU policies focus on an outcome-oriented approach and highlight the validation of non-formal and informal skills. It should be expected that NQFs are in line with these commonly agreed goals. Second, NQFs have to be related to the EQFs and are therefore at least partially dependent on the choices that have been made when designing the EQF. From a juridical perspective, although member states are free to decide *if* they wish to adopt a NQF, there are limits as to *how* they implement an NQF once they decide to do so (Herdegen 2009). The implementation process aims at establishing overall coherence (BMBF 2012b: 3), which implies a certain degree of common principles regarding the implementation of NQFs. Since the EQF aims at making qualifications comparable across Europe, the idea of a “*effet utile*” implies that member states are required to construct NQFs in a way that every EQF level has an equivalent level in respective NQFs (*ibid.*). While the European Commission can consult member states on NQFs, no power to govern the process or the NQFs derives from the recommendation (*ibid.*). Third, Drexel (2005: 42) argues that since the Commission has provided rather detailed descriptions for the EQF levels, the scope of action left to the member states is in fact even more limited. The Commission had added two non-binding annexes to the EQF—officially with the objective to support countries when linking their VET systems to the EQF. One of the two documents, however, includes not only more detailed information on occupational tasks related to specific EQF levels, but also concrete information on input factors. It specifies characteristics of educational tracks for each EQF level—including the location of learning and bodies to control and regulate educational tracks (*ibid.*, 43). According to Drexel, these documents therefore put pressure on convergence towards the VET systems, after which the EQF has been modelled.

In practice, only limited divergence from EQF concepts can be observed among NQFs. Most countries have chosen to introduce NQFs with eight levels similar to the EQF, although NQFs exist that have 12 levels (Scotland), 10 levels (Iceland and Ireland) or seven levels (Poland) (Cedefop 2010a: 28). Because countries can decide on the balance between different kinds of skills, national descriptors differ considerably (*ibid.*). For example, the German NQF comprises four descriptors for each level, which have been introduced in order to capture the holistic approach to

⁵In general, NQFs can encompass all qualifications or only certain educational pathways or sectors; can be designed by a central agency or developed gradually by all stakeholders; can be based upon a voluntary or legal basis; and can focus on learning inputs or on learning outcomes. NQFs usually have levels, whether these are explicitly defined or assumed implicitly. National actors choose which educational programmes (input factors) are related to which levels.

occupations in Germany (*Berufsprinzip*) more adequately. Austria separates higher education and VET by using distinct descriptors for academic and for VET qualifications (ibid). The French NQF then again does not comprise general education (BMBF 2012b).

The design of the EQF has been subjected to critique. The German Academic Association enacted a resolution which summarises several points of critique which have also been brought forward elsewhere (Deutscher Hochschulverband 2010). First it criticises that eight levels provide for a rough grid only, and therefore its use in practice is contested (see also interview NL_PUBL-2). On the contrary, interview partners from German companies confirmed the usability of the EQF when it comes to providing first information on an applicant's qualifications (interviews DE_PRIV-2, DE_PRIV-4). A second point of critique is that education contributes to the personal development, and the focus of qualifications should therefore not be limited to key skills. Third, the three categories—knowledge, skills and competences—are believed to lack a precise and commonly agreed definition. The German trade unions argued that descriptors are too complex, which limits their usability in practice (DGB 2005); Hanf (2012) points out that descriptors are defined in a very abstract manner and doubts that a common language exists that can establish a transnational validity for the different categories underlying such a framework. A Dutch interview partner argues that although it has been a goal of the EQF to foster labour mobility, such effects are unlikely in practice (interview NL_MIXED-5). Specificity will rather be fostered by the “European Typology of Skills, Competences, Occupations” in which a detailed map of qualifications, their learning processes and the labour market requirements will be established (ibid). Finally, as an interview partner in the Netherlands remarks, qualifications such as bachelor degrees that are related to the same EQF level differ regarding their de facto level (interview NL_MIXED-2). The value of qualifications is perceived and ranked differently across states (interview NL_MIXED-1). In the end, the success of the EQF will also depend on the coherence of the referencing across countries; countries have made use of the scope left to them in different manners (interview NL_MIXED-8). Yet, an interview partner from the Commission (interview EU_PUBL-1) argues that the countries' referencing is discussed in the advisory group in order to achieve a coherent referencing across countries. While qualifications on the same level might not be exactly the same, the interview partner is confident that differences will be small. Another interview partner (EU_PUBL-4) also highlighted the importance of the peer process, which could balance national interests on the European level and provide for trust. Of course, there are no sanction mechanisms since the EQF is soft law, albeit incoherent referencing might undermine the EQF (ibid).

European Credit System for VET (ECVET)

Member states agreed to “investigate” options for establishing a credit system for with the Copenhagen declaration (Council of the European Union 2002a). In 2003, a working group discussed proposals for the introduction of such a system. At that time, the instrument was understood as a means to transfer elements of the

European Credit Transfer System (ECTS)—the credit point system in higher education—to VET (Fahle and Thiele 2003: 12). However, there was substantial disagreement on the design of the instrument. The working group had prepared a document for a consultation process that aimed at introducing a comprehensive credit point system which would combine vocational and general education only in the medium run (Drexel 2005: 30). The Commission replaced this proposal with a paper which had the objective to introduce an encompassing credit point system—comprising vocational and general education including higher education—already in the short run (*ibid*). Member states did not agree (interviews DE_PUBL-1, DE_PRIV-3; Drexel 2005). An interview partner from the European level reports that social partners in particular preferred separate systems (interview EU_PUBL-4). As a consequence, several studies that were commissioned by the Commission in 2005 dealt with the introduction of credit points only in the field of VET (Le Mouillour and Gelibert 2007). A public consultation took place between October 2006 and March 2007 which dealt with an ECVET system solely encompassing VET (European Commission 2006a).

In addition to the question which educational strands a credit point system should encompass, another point of conflict was the way learning outcomes should be transferred between countries. The Commission initially planned a much more fluent system, which would allow an individual—in presentations the Commission used the example of a “Mr. X”—to complete modules in different countries and have them recognised as a full qualification in any member state (interview DE_PUBL-1). In practice, this would have meant that “Mr. X” could take one vocational class as a module in country A, another module in country B, another in country C, and have all of these recognised in country D. Such a system, however, was opposed by several member states, including Germany (*ibid*).

A recommendation on the establishment of ECVET was issued only in 2009 (European Parliament and Council 2009b). The instrument focuses on VET and does not include transfers of credits to general or higher education; member states are merely asked to build up expertise in order to increase the complementarity and compatibility with ECTS. The recommendation asks member states to take measures so that ECVET can be used from 2012 onwards. The objective of ECVET is to enable transferring, recognising and accumulating learning outcomes across the EU (*ibid*). Where appropriate, this shall include non-formal and informal learning. The way ECVET works is to describe a qualification in terms of a unit of learning outcomes and associate it with points. Competent institutions and partners decide on the way units are designed and can be accumulated for a given qualification on the basis of national or regional rules (*ibid*). Units are then assessed in one setting/member state and can be transferred to another, where they are validated and recognised. Units can be credited to the qualification the learner aims to achieve. The competent institutions and partners involved in the process decide on the assessment, validation and accumulation of the unit. Credit points are defined in order to show the weighting of the respective learning outcomes as a part of the whole qualification. As a rough guideline, 1 year of full-time learning in formal VET is seen to be equivalent to 60 ECVET points. ECVET points have a meaning

only in relation to the qualification in question, unless regulation on member state level allows further applications. Partnerships are supposed to be established in order to facilitate credit transfer and to provide a general framework of cooperation and networking. Thus, Memoranda of Understanding contribute to establishing mutual trust between the institutions. They set the conditions for the partnership and facilitate credit transfer by accepting each other's assessment, validation and recognition. Individuals receive learning agreements and personal transcripts during the course of their mobility experience. In sum, the process of transferring credits is fully in the hands of competent partners, so that national legislation on the accumulation of units and the recognition of learning outcomes is fully respected. The recommendation clearly states that citizens are not entitled to automatic recognition.

The take-up of ECVET on national level was mixed regarding the commitment and the focus of governments (Cedefop 2010a: 32–33). On the one hand, the number of ECVET projects rises continuously with 130 projects already existing in 2012 (BMBF 2012a: 73). The Commission often refers to the Finnish and the German case as best practices. The Finnish Finecvet (2005–2011) focuses on fostering European mobility (ibid, 33). The German DECVET initiative (2008–2012) aims at improving options for moving between different parts of the VET system on the national level. The Commission did not initially intend to steer such permeability reforms on the national level with ECVET, but took up this idea as a good example so that the second generation of ECVET projects increasingly focus on permeability within member states (interviews DE_PRIV-2, DE_PRIV-3, DE_PUBL-8). An interview partner from an employers' organisation stressed, however, that it is surprising that member states accept these measures since this area falls within their responsibility (interview DE_PRIV-2). In Germany, in spite of this project, doubts prevail regarding the cost-benefit relationship of ECVET, as an interview partner from the federal public administration remarks (interview DE_PUBL-2). Other countries still hesitate to implement ECVET, mostly because of the complexity of the instrument. Norway, for example, argues that ECVET lacks relevance and questions the compatibility with the Norwegian VET system (Cedefop 2010a: 33). Switzerland, a country with a dual VET system, does not intend to implement ECVET because it is considered too difficult to establish a system comprising both the dual system and general education. Moreover, Swiss employers fear ECVET could undermine the occupational principle (*Berufsprinzip*) (Bieber 2010).⁶ To sum up, the take-up of ECVET differs remarkably across countries, and there has been a considerable disagreement regarding the instrument.

Critics have pointed out that because of the close connection between EQF and ECVET—the EQF can serve as a basis for transferring qualifications or elements of a qualification of the same level—implementing the EQF prior to implementing

⁶Both Switzerland and Norway are not members of the EU, although Norway is a member of the Copenhagen process and Switzerland has implemented EU education policies in other cases (see Bieber 2010), so that EU membership might make a difference regarding the take-up of ECVET.

ECVET would have been advisable (interview NL_PUBL-4). Short-term success should not be expected: An interview partner reports that a chair of an off-the-record meeting on the European level, a Commission official, remarked that the implementation of ECVET “will take a generation” (ibid). Another point of discussion is that ECVET is orientated towards input criteria rather than towards learning outcomes (interview NL_PUBL-2; Brockmann et al. 2010). An interview partner from the European level argues that this is an “ideological position” and that it should be possible to find a compromise that combines both learning outcomes and—at least to some extent—the workload (interview EU_PUBL-4). On the European and national level, interview partners agreed that the objectives of ECVET are not clear enough and that this is an important reason for the slow take-up (interviews EU_PUBL-4, NL_MIXED-3). A Dutch public official believes that the Commission has been too ambitious regarding ECVET (interview NL_PUBL-4). An interview partner in Brussels (interview EU_PRIV-2) has observed “power plays”: The Commission fostered launching the instrument, while member states show only a small commitment. An interview partner from Cedefop concludes that ECVET “has been a very complicated thing” (interview EU_PUBL-4).

Quality Assurance: The European Quality Assurance Reference Framework (EQARF)

For the successful implementation of both EQF and ECVET, it is important that certain quality criteria are met across all countries and VET programmes. The Copenhagen declaration as well as subsequent declarations underlined the importance of quality in VET; the Barcelona Council in 2002 established the objective to make European education and training systems “a world quality reference by 2010” (European Council 2002: 43). Already in 2001, the European forum on quality in VET was established. A working group on quality in VET was assigned the task to develop a common quality framework on the basis of national best practices (Küßner 2009). In 2004, the Council endorsed the Common Quality Assurance Framework as a systematic approach to quality assurance and invited member states to voluntarily promote the framework together with relevant stakeholders (Council of the European Union 2004a). This quality assurance framework was characterised by a high degree of detail and complexity. A German public administration official reports that the framework had 200 indicators, and it was commonly agreed that the instrument was hard to handle (interview DE_PUBL-6). In October 2005, the European Network for Quality Assurance in VET (ENQA-VET) was established with the purpose to facilitate cooperation between countries and implement the framework. The exchange on the European level made clear that in spite of the heterogeneity of VET systems across Europe, states face similar challenges when it comes to the development of quality criteria and measurement instruments, so that European cooperation can support member states in this field (Küßner 2009).

In June 2009, a recommendation on EQARF was adopted (European Parliament and Council 2009a). The recommendation invites member states to devise a

national quality assurance approach until April 2011, establish a Quality Assurance National Reference Point for VET, participate in a network which is chaired by the Commission, and undertake a review of the implementation every 4 years. EQARF builds on the Common Quality Assurance Framework but focuses on concrete procedures and criteria which are easier to operationalise, which makes the instrument less complex and detailed (Küßner 2009). With EQARF being based on a recommendation of the European Parliament and the Council, the standing of quality assurance increased. EQARF is geared towards improving transparency and consistency of VET policies in and between member states. It introduces a monitoring process which shall encompass VET systems, providers and the awarding of qualifications (ibid). At the heart of the quality process is a cycle of planning, implementation, assessment, and review. The continuous analysis of VET systems is foreseen to be carried out both qualitatively and quantitatively (ibid). The latter is carried out with the help of ten indicators, which serve as a “toolbox” from which countries can choose those indicators most relevant for the advancement of their own system (see Annex II). The character of a toolbox instead of benchmarks was chosen since employers (interviews DE_PRIV-2, DE_PRIV-3) and several member states (interview DE_PUBL-6) opposed compulsory benchmarks in this field. European Parliament and Council (2009a: 3) underline that the use of the framework is voluntary, and implementation can easily be in line with national practices: “The Framework does not prescribe a particular quality assurance system or approach”.

The European Quality Assurance in Vocational Education and Training (EQAVET) was founded as a network bringing together member states, social partners and the Commission with the objective to facilitate collaboration and implementation of quality assurance on the basis of EQARF. Two working groups on quality assurance exist on the European level: One is working on guidelines, one on indicators (interview NL_PUBL-1). Members of the working groups include national administrations, social partners, and VET providers. The European Commission and Cedefop are also present at the meetings. Interview partners for this work have reported that the network is very active (interviews NL_PUBL-1, DE_PRIV-3).

Assessments of the impact of EU quality assurance differ. On the one hand, German employers argue that the instrument opens up *de facto* steering competences on the European level in spite of its voluntary nature (KWB 2010: 2). This is because annexes to the recommendation provide detailed proposals for the implementation in member states as well as establish encompassing reporting requirements. As a consequence, “in reality, full implementation by the Member States would result in an EU competence for steering and monitoring education policy which goes well beyond the competences described in articles 149 and 150 TEC” (KWB 2010: 2). On the other hand, an interview partner from the German public administration reports that the search for consensus among member states has made the EU concept very broad (interview DE_PUBL-1). Ultimately, the design of the

instrument leaves the effectiveness of quality policies in the hands of member states. An interview partner from the public administration in Germany points out that the impact of EQARF could be high if it was indeed implemented as a quality circle on the macro level—however, member states and stakeholders are reluctant to do so, especially because of the potentially far-reaching consequences (interview partner DE_PUBL-2).

Implementing EQAVET is seen as a complex and long-term endeavour. Some countries use the quality model on which EQAVET is based, others are discussing to use the indicators in the national realm (such as Germany, the UK/Northern Ireland and Scotland), and again others have already aligned their indicators (including the Netherlands and the UK/England and Wales) (Cedefop 2010a: 30). Countries in which quality mechanisms for VET had been in place for many years (including Germany and the UK) have a tendency towards applying more encompassing approaches (ibid). In general, Cedefop notices a shift towards increasingly measuring quality with output standards and targets rather than focusing on input criteria and processes, as well as linking financing to results (ibid). Although improving the quality of VET systems is a complex task involving many different institutions, most countries have developed strategies or regulations for improving quality assurance in VET as well as for encouraging a culture of quality (ibid). Since national VET systems and quality assurance systems are heterogeneous, there still is scope for action for initiatives on the European level, as an interview partner from the Dutch public administration believes (interview NL_PUBL-1). In sum, the Commission believes that implementation differs across countries, and implementing EQARF is not the first priority for some member states (interview with a Commission official, EU_PUBL-2). The method of peer learning is believed to be efficient, as assessments of the Commission suggest (ibid) and as a Dutch public official states in an interview for this work (interview NL_PUBL-1).

Validation of Non-formal and Informal Learning

From 1985 onwards, Cedefop developed detailed comparisons for the skilled worker level. Just as early, the issues of non-formal and informal training as well as competence-based qualifications came up in this context (Gordon 1999: 205). Beginning with the Commission's memorandum on lifelong learning (European Commission 2000), the validation of non-formal and informal learning was discussed more intensively both on the European level and in national debates (Frank et al. 2003). Since validation mechanisms across member states were shown to be very heterogeneous, European principles on identifying and validating non-formal and informal learning (Council of the European Union 2004b) were adopted in 2004. The objective was to create common points of reference. In 2009, more detailed guidelines on the validation of non-formal and informal learning were issued (Cedefop 2009). Searching for a consensus among member states made the EU concept very broad, as an interview partner from the German public administration reports (interview DE_PUBL-1). In 2012, a Council

recommendation was issued that asked member states to have validation arrangements in place by 2018.⁷

The guidelines issued in 2004 and 2009 entail both the European as well as the national perspective. The individual is seen at the centre of the process. Organisational structures, process structures, methods, and practitioners are also addressed. Fundamental principles of validation are established: Validation procedures should take place voluntarily, respect the privacy of the individual, guarantee equal access and fair treatment, involve stakeholders, comprise mechanisms for guidance and counselling, be based on quality assurance mechanisms, and assure professional competences for validation practitioners.

Validation of non-formal and informal learning is closely related to learning outcomes and qualifications frameworks. Since it enables workers to demonstrate their skills and competences no matter where they have been obtained, it is perceived to improve the individual's learning and employment prospects in finding jobs that adequately reflect their skills as well as in the progression to further education. Thereby, the validation of non-formal and informal qualifications increases the significance of learning at work. By providing an alternative route of learning, validation procedures increase the flexibility of education institutions and education systems (Cedefop 2010a: 31). Groups with special needs, such as migrants or early school leavers, might especially benefit from the introduction of validation mechanisms.

According to Cedefop, about half of the countries have made validation of non-formal and informal learning a priority. Several countries use the European guidelines as a reference point. For many countries, the introduction of validation mechanisms seems to be linked to introducing NQFs and implementing the shift towards learning outcomes. This is because qualifications frameworks make non-formal and informal learning more visible and integrate validation into an overall approach. Moreover, also quality assurance mechanisms facilitate the introduction of validation mechanisms, since they provide credibility regarding the value of the acquired qualifications (Cedefop 2010a: 31–32). Highly developed validation systems, on the other hand, were in place in only four member states in 2010 (European Commission 2012). Seven further countries have systems that are either only being developed or that cover only parts of the system or sectors (*ibid*).

Europass

Europass was established in 2004 (European Parliament and Council 2004) based on the call of the Copenhagen declaration to integrate the European CV, diploma supplements and the Common European Framework of Reference for Languages into one single framework. The objective of Europass is to support geographical and job mobility by making qualifications better understood across Europe (Cedefop 2010a: 34). It addresses the individual. Some countries have set up Europass centres to help promote and disseminate Europass (*ibid*). In conclusion,

⁷This recommendation was issued after the observation period of this work and hence is not part of my analysis.

while Europass is a valuable instrument to foster the “readability” of qualifications across Europe, it focuses on the individual and therefore will not impact member states’ institutions.

2.3 The Political Economy of the Copenhagen Process

This chapter will analyse the Copenhagen process against the background of VoC. I will proceed in two steps. First, I argue that in general—meaning beyond the Copenhagen process—EU VET policies are biased towards both general skills and market-making policies. Here, I will take a broader view, including the historical development of European VET policies and European education policies and programmes. In a second step, I will analyse in what ways instruments and guidelines developed in the realm of the Copenhagen process might have an impact on CMEs and LMEs. I will show that also the specific instruments and principles have a—potentially—more far-reaching impact on CMEs than LMEs.

EU VET Policies Focus on General Skills and Market-Making Policies

The reason why the EU became involved in education and training policies already in 1957 was the importance of education policies for the completion of the internal market. Education and training policies were relevant insofar as they might constrain the four freedoms (Hantrais 2007: 47). Member states opposed any further regulation in this policy field (Jakobi 2009: 89). The importance of human resources for economic growth was the reason behind putting education at the centre of the Lisbon strategy. Herewith, the Commission’s concept of education and lifelong learning consequently frames education against the background of human resources and leaves the responsibility for learning and skills in the hands of the individual, rather than of the state (Kleibrink 2011: 76).

EU VET policies focus on general skills, as becomes obvious in several ways. First, the involvement of the EU in education and training policies is closely intertwined with the internal market, freedom of movement and growth. Therefore, mobility and employability have been important aspects of EU VET policies from the beginning. Such a focus has specific consequences on the kind of skills the EU tries to advance: for mobility and employability, general skills are more advantageous than specific skills. It is in the nature of these concepts that they relate much better to general skills, which can be used in any other company or industry. Specific skills can be used only in the company where they have been obtained. Industry-specific skills are of use in the respective industry—however, VoC assumes that skills are very much interrelated with complementary institutions that are largely country-specific so that they can, arguably, only partially be transferred to the same industry in other countries.

Second, in line with this theoretical argument, several official documents show a strong focus on promoting general skills. The following two documents can serve as examples:

- In its white paper on education and training (European Commission 1995), the European Commission sketches out challenges to the way economies and societies work—the transformation towards an information society, internationalisation of trade, and impacts of science and technology—and concludes that two responses to these challenges are needed. First, it is necessary to give each person access to a broad knowledge base, which is not only important for initial learning, but also the foundation for retraining workers (*ibid.*, 10). Second, every person should have the abilities to take part in economic life and employment. Herewith, the skills “most favourable to employment” are “broad and transferable” (*ibid.*, 13) and consist of a body of both fundamental and technical knowledge;
- One target of the 2000 Lisbon Council was to identify new basic skills. These skills shall be compiled within a European framework and shall include skills in IT, foreign languages, technological culture, entrepreneurship, and social skills. In the influential Memorandum on Lifelong Learning, the Commission explains that action in this field becomes necessary because “economic and social change are modifying and upgrading the profile of basic skills that everyone should have as a minimum entitlement” (European Commission 2000: 10). Although these basic skills are primarily taught within primary and secondary compulsory education, the Commission relates the changing requirements towards basic skills to VET: “General, vocational and social skills hence increasingly overlap in content and function” (European Commission 2001b: 22).

Third, a focus on general skills can also be seen in the EU’s measures and initiatives. In all mobility programmes such as Leonardo, language skills and intercultural competencies are promoted. The reason for EU initiatives supporting language learning is threefold: these skills have high labour market relevance in a globalised economy, they are necessary components for the completion of the internal market and they can promote European citizenry. Language skills and intercultural competencies, however, are general skills. The same is true for ICT skills, which are promoted by the EU in various ways.

Fourth, the EU hardly promotes the acquisition of specific skills. Since skills are the more specific the more firms are involved in the formation of skills (Busemeyer 2009a: 382), the EU could promote the acquisition of specific skills by promoting the engagement of firms or by fostering training on the firm level. In the past, references to fostering apprenticeships could be found in several documents, such as in the 1995 White Paper on Education and Training (European Commission 1995), and it was one of the objectives of the Leonardo da Vinci mobility programme (Baron 2007). However, from 2007–2013, superordinate targets of the lifelong learning programme and of Leonardo da Vinci no longer included the advancement of apprenticeships (Baron 2007).⁸ Moreover, substantially fewer apprentices than university students make use of mobility programmes. In sum,

⁸Together with Comenius, Erasmus, Gruntvig and the Jean Monnet programme, the Leonardo da Vinci programme was integrated into the Lifelong Learning Programme during this period.

fostering specific skills to considerably smaller degree than general skills makes EU education policies biased towards general skills.

Fifth, EU policies prioritise tertiary education. The Education & Training 2020 strategy aims at increasing the share of 30–34 year olds with tertiary education attainment to at least 40 %. This benchmark is based on the 1997 International Standard Classification of Education (ISCED) which includes, for example, German advanced occupational *Meister* professionals (master craftsman or technician) qualifications.⁹ The Council argues that a high share of university graduates is necessary to meet the needs of the labour market and of research (Baron 2007). Within the Bologna process, efforts are being made to increase the share of university graduates (ibid). However, this can lead to a competition between higher education and VET, as well as to creaming off if secondary education graduates who would formerly have started VET now attend higher education programmes.¹⁰

The Impact of the Copenhagen Process: How It Potentially Challenges CMEs and LMEs

In line with the argument that EU VET policies are biased towards general skills and market-based provision of VET, this section shows that the instruments and guidelines developed within the realm of the Copenhagen process challenge CMEs much more than they challenge LMEs. As a consequence, I argue, they are biased towards LMEs.

Looking at the documents and declarations published as part of the Copenhagen process, there is some evidence that it is geared towards flexibilisation and liberalisation of VET. For example, the recent Bruges Communiqué emphasised the idea to make VET more flexible (European Ministers for Vocational Education and Training et al. 2010). In this Communiqué, the Education Council, social partners and the Commission jointly set priorities for European cooperation in VET from 2011 to 2020. The term “flexible pathways” is mentioned several times. It is also mentioned in the agreement on short-term deliverables for 2011–2014 as a means for raising the participation of low-skilled (ibid, 16).

When assessing the potential impact of the Copenhagen process on CMEs and LMEs, it is however necessary to not only refer to abstract statements but to analyse the instruments and principles more closely. Yet, it is important to keep in mind two aspects which greatly influence the impact the Copenhagen process will have on member states. First, there is reasonable scope left to the member states regarding the implementation of the different instruments and guidelines. This scope can make a substantial difference regarding how far core factors of coordinated skills regime are challenged. However, this scope is also limited by decisions taken on the European level, such as numerous proposals for implementation. The instruments

⁹According to data from Eurostat, the EU average was 22.4 % in 2000 and rose to 33.5 % in 2010. For the country cases of this work, the figures are as follows: Germany, 25.7 % (2000), 29.8 % (2010); the Netherlands, 26.5 % (2000), 41.4 % (2010); the UK, 29 % (2000), 43 % (2010).

¹⁰For a detailed discussion on the relationship between higher education and VET see for example Powell and Solga (2008) and Graf (2013).

and guidelines developed are, second, soft law and non-binding. Even though the Europeanisation literature ascribes a certain amount of peer pressure to the functioning of the OMC, states can choose to not or only partially implement all or single instruments.

In the literature, assessments of potential effects of ECVET and EQF on national VET systems differ greatly. This is partly due to different understandings of the nature of EU VET policies. Many authors do not distinguish between the two instruments but perceive it as one coherent system. While I argue above that member states do have a considerable degree of scope regarding the implementation of the Copenhagen process, authors often do not address this aspect.

In Germany, a controversial debate on the impact of the Copenhagen process took place. Especially, it was vividly discussed if European VET policies would affect the occupation-based nature and holistic approach to occupations (*Berufsprinzip*). In a similar vein, Swiss employers stated that ECVET challenges the *Berufsprinzip* (Trampusch 2010a: 187). Many authors have argued that EU VET policies have the potential to put an end to dual VET systems such as the German one (Drexel 2005; Rauner 2006: 37). Authors such as Drexel (2005), Hanf and Rein (2006a), Rauner (2006), and Werner and Rothe (2011a: 3) all believe that EQF and ECVET require a very encompassing degree of modularisation that will fundamentally transform the German apprenticeship system. Drexel (2005) takes a very critical stand on EU VET policies and regards EQF and ECVET as a distinct system which is incompatible with the German system. Moreover, she argues that the implementation of EU instruments would require broad changes of both curricula and didactics. In Drexel's opinion, the implementation of EQF and ECVET would imply abolishing the occupational principle (*Berufsprinzip*) as well as the capability to perform an occupation autonomously (*berufliche Handlungsfähigkeit*).¹¹ These critical assessments are fed by a study edited by the BMBF, in which Gehmlich (2009: 5) develops a proposal for introducing a NQF which largely abolishes standardised educational pathways and degrees.

If the Copenhagen process would lead to such a liberalisation of national VET systems, what would be the consequences? Finegold (1999) discusses the advantages and disadvantages a change towards a "competence-based system", as he calls it, would have for Germany. On the one hand, such a shift would lift "performance over standards" and foster innovation among providers. Moreover, access to the status of skilled workers might be facilitated and broadened, to the advantage especially of older workers (ibid) and the (numerous) outsiders. On the other hand, such a transformation would have severe disadvantages: "The most powerful objection to a competency-based system is that it risks reducing the quality and breadth of the nationally recognized apprenticeship qualifications, by encouraging

¹¹Moreover, Drexel (2005) argues that the full implementation of EU policies would demand a liberalisation of initial VET, the privatisation or closing down of public VET schools, and stopping public financing for the VET system (81–82). She does, however, not give detailed reasons why all this necessarily follows from EU VET policies.

individuals and their firms to focus just on the specific competencies which are tested, with insufficient attention to the underlying knowledge, general skills, and work socialization process needed to prepare individuals who are flexible enough to adapt to the changing economy” (ibid, 416). Therefore, with deconstructing skill profiles, employers and apprentices might stop investing in the acquisition of broader and transferable skills. The *Berufsprinzip* on the contrary is based on the idea that an occupation constitutes more than the sum of single units (Drexel 2005) and that the individual is able to act and reflect autonomously. As a consequence, the fine balance of incentives for both employers and apprentices to take part in training will change. Following VoC, a shift towards a liberal market VET system would, moreover, have consequences on complementary institutions,¹² especially because of the high importance of VET for the “diversified quality production” (Streeck 1991).

The possible consequences of a shift towards a liberalised VET system in the direction of a liberal skill regime would be far-reaching. Yet, can the Copenhagen process unfold such an impact? In the following, I will examine the possible impact of the instruments and principles more closely.

As a first point, modularisation in fact corresponds to the logic of making qualifications comparable across Europe. The higher the modularisation of VET systems, the better transparency across VET systems can be achieved (see for example Rauner 2006: 41). Already in the 1990s, the Council looked at the modularised English National Vocational Qualifications (NVQs) as a role model for mutual recognition of VET qualifications across Europe (Baron 2007: 75). This is because single competences can be compared and transferred more easily than whole VET qualifications: VET qualifications that take years to accomplish always comprise a certain bundle of competences, and it is unlikely that a VET qualification in another country is made up of the exact same combination of competences or learning outcomes.

While modularisation therefore *facilitates* the implementation of EQF and ECVET, is it a *necessary* precondition of the Copenhagen process? And will it put an end to CME VET regimes?

Different assessments exist in the comparative political economy literature. Powell and Trampusch (2011) argue that the initiatives foster modularisation as well as the permeability between the different strands of education. In their perspective, learning outcomes is opposed to the principle of vocational education and to the normative and political foundations of CME skills systems. Permeability might lead to increasing competition between VET and tertiary education—and VET actors fear that such a competition would be disadvantageous for them. Moreover, “modularization demands the dividing up into component parts of

¹²For example on wage bargaining: “From a union perspective, common standards prevent a differentiation of occupational profiles that would increase conflict between workers over wage levels, which would in turn interfere with the smooth functioning of the collective wage bargaining system” (Thelen and Busemeyer 2008: 14).

what is considered comprehensive vocational capability (...)—upon which the strength and uniqueness of collective skill formation systems are founded” (ibid, 286).

A different assessment is provided by Thelen and Busemeyer (2008: 17) who argue that modularisation threatens the *Berufsprinzip* only if it is implemented in a way that deconstructs skill profiles. If modularisation solely refers to the way skills are acquired, in their view it is compatible with the *Berufsprinzip*. Kremer (2007: 38) agrees with this perspective. He argues that while modularisation is a necessary component of the EQF, and ECVET then can make these units assessable, still units could also be examined as a whole and within nationally regulated full qualifications.

The latter point of view is underlined by the Austrian case. As Trampusch (2009) reports, in Austria discussions on modularisation had started prior to the Copenhagen process and in 2006 the system was modularised. It is recommended—explicitly not in a mandatory way—that apprenticeships are divided into a basic module, main modules, and special modules. Trampusch reports that this reform is widely perceived to take place within the system and without implying a shift towards a LME VET regime. The Austrian VET system comprises a vital dual apprenticeship system with a strong VET track combining a full VET qualification with a University entrance qualification. While it therefore can be considered as a dual system with influences of school-based training, the Austrian VET regime meets the criteria for a CME VET system (Busemeyer and Trampusch 2011b). Ergo, if modularisation can be implemented in Austria in a way that is in line with its existing VET system, EU initiatives cannot be incompatible with CME VET systems per se.

When it comes to ECVET, it is important to distinguish between the way the Commission had originally envisioned the instrument and the way it was put in practice by the 2009 recommendation. It has already been outlined above that the Commission originally planned to introduce a system in which each individual (“Mr. X”) would have been able to conduct modules—in informal, non-formal or formal learning—in any member state or different member states, and have them recognised as a full qualification in any member state (interview DE_PUBL-1). Mike Coles, who had been involved in several reports which laid the ground work for the EQF, has written a report for the ETF on the ways qualifications frameworks can be designed and used (Coles 2006). Analysing the relationship between qualifications frameworks and credit systems, he brings forward the idea to relate credit to learning requirements in other qualifications. Individual units are assessed and accumulated, so that they serve as building blocks towards a specific qualification. They can also be transferred to another setting and serve as building blocks towards a different qualification (ibid). For example, transferred to the German context, a unit on oenology for restaurant specialists (*Restaurantfachleute*) may be given credit in similar apprenticeships, for example hotel specialists (*Hotelfachleute*). A challenge is that learning units would have to be related to distinct qualifications levels. A unit on the diagnosis of motor defects, for example, might be more complex for *KFZ-Mechatroniker* (3.5-year-apprenticeship for car mechanics)

than for *KFZ-Servicetechniker* (2-year-apprenticeship for car mechanics). Coles argues that in order to fulfil this function, credit frameworks have to provide “a universal measure of the *volume of learning* for a unit” (ibid, 21; italics as in original). Usually, this volume of learning is measured as the time it takes to learn the respective competence (ibid). It is worthwhile to look at Coles’ argument in such detail since the way he presents credit systems certainly implies a high degree of modularisation. However, the 2009 recommendation on ECVET reduces the instrument to focus on mutual exchange in which national systems are left unaffected. This way, ECVET increases options for individuals to move between systems, but does not focus on reforming national VET systems (interview EU_PUBL-4). It seems that there is a difference in the policy concepts as they are envisioned by the Commission and as they are acceptable to member states which is underlined by the different preferences regarding the instrument that have been pointed out above (see Sect. 2.2). In sum, the way the instrument has been envisioned on the European level, it is not hard to foresee problems for CMEs regarding almost all their core features. However, the way the actual ECVET recommendation is designed, there is ample scope for action regarding the way instruments are implemented—and therefore it largely depends on the national implementation in how far the *Berufsprinzip* is affected or if and what modularisation is carried out.

At the same time, the origin of one of the most important and the most widespread instruments of the Copenhagen process, the EQF, is heavily based on the concept of qualifications frameworks already existing in LMEs such as the UK. Experts from the English QCA¹³ have published extensively with European experts on qualifications frameworks and the EQF (Bjornavold and Coles 2007; Coles 2006, 2007). In fact, the design of the EQF shares many similarities with the English qualifications framework. Moreover, the logic of NQFs corresponds much more to LMEs than to CMEs: Qualifications frameworks in the UK were developed as a response to problems resulting from low standardisation (Kohlrausch 2009). They are a means to providing orientation and fostering comparability of qualifications. As such, qualifications frameworks serve as a currency in a market in which qualifications, providers, regulation as well as the design and tasks of public bodies change continuously. In CMEs on the other hand, VET is much more standardised regarding qualifications, contents, and providers. Therefore, qualifications frameworks are, arguably, less needed in CMEs than in LMEs in the first place.

As pointed out above, the EQF has a twofold objective. First, it aims at providing a basis for comparing qualifications across the EU and second of steering reforms on the national level. As Powell and Trampusch (2011: 294) point out, qualifications frameworks cannot be seen as mere technical instruments but also have social and political functions. As an instrument stemming from the logics of LME

¹³The QCA was an English non-departmental public body; its tasks were to advise the government on qualifications, curriculum and assessment as well as to regulate quality and standards of qualifications.

qualifications systems and with the purpose of steering national reforms, qualifications frameworks are clearly biased towards reforms in the direction of a LME skills regime. While this is a rather abstract argument, it can be underpinned by practical examples. On lower levels of the EQF, corresponding NQFs might manifest or formalise qualifications that are below the threshold of what is formally considered a full VET qualification in CME VET regimes. Qualifications on this level might not be able to comprise a holistic approach to VET. For the individual, qualifications below such a threshold are often related to instable employment perspectives. Consequences on wages and wage bargaining might follow. As pointed out previously, strong wage bargaining in CMEs leads to an approximation of wages of low-skilled and skilled workers, so that firms have incentives to better align the productivity of low-skilled to their wages by investing in their training (Busemeyer 2009a, based on Streeck). Moreover, the underlying concept of learning outcomes is criticised to not fully reflect a holistic understanding of VET qualifications, which also includes an individual's development of the personality (Dehnbostel et al. 2009) or the ability to reflect and act autonomously (interview DE_UN-1). The BIBB argues that descriptors overemphasise cognitive competences, which advances learning in VET schools (Baron 2007). Related to this, furthermore, an interview partner from a trade union (interview DE_UN-1) argues that descriptors on higher levels of the EQF are biased towards university qualifications. This would make the referencing of vocational qualifications to higher EQF levels more difficult than for general education, which might undermine the status of VET. In sum, introducing NQFs has the potential to challenge two core features of CME VET regimes, namely the standardisation and the status of VET.

While the EQF and ECVET are potentially most far-reaching regarding possible impacts on national systems, the other instruments of the Copenhagen process are also biased towards LME VET systems. The validation of non-formal and informal learning as well as the shift towards learning outcomes imply that it does not matter where a qualification has been obtained. This challenges the dual system, which exactly relies on the balance between training in companies and vocational schools. It is this balance of places of learning and their specific learning methods which enables the mix between specific and general training. Traditional input-based certificates include aspects such as learning contents, educational objectives and didactics of a certain educational programme (Drexel 2005: 34). In the words of Deissinger et al. (2011: 398): "The idea of a flexible, individual and ongoing acquisition of competences which should be independent from 'input factors' corresponds with open learning arrangements that are no longer linked to specific courses, curricula, training times or examinations." These would all become much less relevant. An interview partner from Cedefop (EU_PUBL-4) points out that the concept of learning outcomes, however, can be implemented in various ways and taking into account national contexts and traditions, including a way of implementation that focuses on comprehensive qualifications. If combined with the way the

Commission originally envisioned ECVET (“Mr. X”), this challenge would have been multiplied: According to this concept, units that were acquired via any type of learning in any country would form part of qualification in any other country. In the end, the validation of non-formal and informal learning as well as a shift towards learning outcomes at least provide a window of opportunity for a reform that challenge the *Berufsprinzip*.

The validation of non-formal and informal learning has the potential to challenge another core aspect of CME VET systems: the standardisation of contents and the certification of skills. Especially regarding industry-specific skills, certification is important for portability (Busemeyer 2009a; Estevez-Abe et al. 2001). Standardisation moreover decreases the risks employers and apprentices face when getting involved in apprenticeships (Thelen 2004: 18–19). Thelen and Busemeyer (2008: 8–9) point out that in “collectivist skill regimes”, certification and the definition of skills largely rely on coordination between social partners. Standardisation of training content and certification play such important roles because once occupations are obtained, they are recognised by all firms across the whole country. In CMEs, the way validation procedures are implemented defines the impact of the procedures on the national VET systems. For example, in Germany options for external participants to take part in the VET examinations carried out by the Chambers (*Externenprüfung*) were facilitated in 2005. Here, the validation of non-formal and informal learning refers to whole occupations only, so that the skill profile itself is not affected. However, it has to be noted that hurdles for individual learners to get competences and skills recognised are lower if units of certification are smaller. Installing validation procedures that build on smaller units on the other hand bears the risk of creating an ‘la carte system’ next to the original VET system. Employers might not train apprentices for full qualifications, but instead only for a few units and have these validated subsequently. This would not only change the balance between general and specific skills but might furthermore crowd out the formal system. As a final point, in several CMEs, certification practices involve social partners: examination committees are tripartite, and firms send their trainers to take part in the examination procedures. This mechanism might collide with validation mechanisms. Werner and Rothe (2011b: 60) argue that the German examination system will have difficulties in certifying small units since it will be too costly for firms, especially for small firms, to let their trainers participate in examination procedures too often. Therefore, Drexel (2005) argues that the implementation of the Copenhagen process leads to a certification market. Kremer (2007: 42) disagrees with this expectation: He underlines that the impact will depend on the concrete details of the implementation and that a “commercialisation” of certification procedures will not necessarily follow (*ibid*).

Quality assurance mechanisms in CMEs are challenged more than in LMEs. In CMEs, quality assurance is strongly based on corporatist self-supervision, national regulation of contents, and on certification. In Germany, on the local

level, semi-public Chambers of Industry and Commerce (*Industrie- und Handelskammern*) monitor the content and quality of VET. Thus, they ensure the comparability of qualifications across the country (Thelen and Busemeyer 2008: 9). Examination committees are tripartite. Basic standards exist for training premises, and trainers in companies are monitored on the local level. Trade unions and employee representation in companies moreover can monitor how VET is carried out in firms. Apprentices have a set of rights based on labour legislation (Drexel 2005). Drexel (2005: 92) assumes that all these quality mechanisms would fall away with the introduction of the Copenhagen process and give place to a very heterogenic set of regulation. Since EQARF only proposes a planning cycle and a toolbox of indicators, this seems unlikely. Similar to the proceedings of Common Quality Assurance Framework, which in the end turned out too complex to steer substantial changes, the EQARF does not address a replacement of CME quality assurance. Yet, quality mechanisms developed on the EU level are more in conformity with quality assurance mechanisms of LMEs.

Another important aspect is that the more firms are involved as providers of VET, which is usually the case in apprenticeship systems, the more challenging the introduction of quality mechanisms might be. According to an interview partner, the Commission had school-based VET in mind when drafting quality assurance mechanisms (interview DE_PUBL-6). In school-based VET, the introduction of comprehensive quality mechanisms is easier (*ibid*). As a consequence, states with dual VET systems opposed comprehensive regulation on quality assurance (*ibid*). EQARF is supposed to be applied not only at the level of national VET policies, but also aims at monitoring training providers and the awarding of qualifications. Quality assurance mechanisms, however, might increase training costs for firms, and therefore change the fine balance of costs and benefits of training. Because of their cost-consciousness (Culpepper 2007), this holds especially for small and medium-sized enterprises (SMEs). SMEs have fewer resources to develop complex quality insurance measures (ENQA-VET 2008: 15). This is also why social partners understand EQARF “as a basic instrument to assist countries in developing their VET systems towards greater effectiveness” and emphasise that it should be in line with the national situation and meet the demands of SMEs. They stress that “national stakeholders should decide on how the implementation of a quality approach is made at provider-level” (*ibid*, 16).¹⁴ While trade unions accept all ten EQARF indicators, employers point out that the most important indicators are the placement rate of graduates and utilisation of acquired skills at the workplace. Employers make their support of EQARF dependent on understanding indicators as a toolbox from which countries can freely choose (*ibid*). In sum, in general it should

¹⁴The cited paper is the outcome of a conference held in Berlin in October 2008. Social partner organisations from 15 countries took part: Austria, Cyprus, Czech Republic, Denmark, Finland, Germany, Ireland, Italy, Lithuania, Luxembourg, Malta, Norway, Poland, Slovenia, and Sweden.

be possible to discuss the topic of quality of VET at provider level in all VET systems, including apprenticeship questions. It seems the way EQARF addresses quality at provider level potentially challenges firms as training providers, which is a topic prevalent in dual VET systems more than in LMEs or school-based VET systems.

Politics of Reform and Actors' Positions¹⁵

Social partners play an important role in the design of instruments: they take part in debates, working groups, and discussions. Four social partner organisations—the umbrella organisations of trade unions, employers, SMEs, and public employers—take part in Director General meetings (interview EU_PUBL-5). European employers' associations welcome the Copenhagen process and its initiatives (interviews EU_PRIV-1, EU_PRIV-4). Employers support ECVET and believe it is a “good instrument”, as an employee of an umbrella organisation interviewed for this work reports (interview EU_PRIV-1). The EQF is seen as a “really a big step” for cooperation on EU level, which is necessary for competing on a global level (interview EU_PRIV-4). Yet, European employers' organisations criticise that there is a gap between Bologna and Copenhagen, and VET at the tertiary level is believed to be a weak spot (ibid). On the other hand, the EQF might also put pressure on universities to link their programmes to labour markets because of the competition with higher vocational degrees (interview EU_PRIV-1). In the view of business, a comprehensive credit points system is missing. For developing ECVET further, a bottom-up approach as well as further experiences are necessary (ibid). Employers' organisations fully support units, but only to a certain degree in order “to not dilute the content” (interview EU_PRIV-1). The interview partner favours an approach which makes some parts of a VET qualification compulsory, and leaves flexibility to add additional elements: “We want to keep a sensible balance on everything. And this should not be a 100 per cent flexibilisation, but it should not be 100 per cent of the German system” (ibid). Employers support quality assurance mechanisms but oppose any standardisation (ibid). Intermediary organisations can support SMEs with resources for covering implementation costs (ibid). There is a consensus between employers and trade unions in the field of education and training in general, also regarding objectives such as mobility and mutual recognition (interview EU_PRIV-4). Trade unions also welcome enhanced European cooperation on VET as well as the instruments and principles of the Copenhagen process (interview EU_UN-1). ECVET is seen as a good result; the interview partner emphasises especially its use for European integration as a result of mutual

¹⁵While the focus of my empirical analysis is on the three country case studies, conducting interviews with European actors has been necessary for this study in order to profoundly analyse the instruments and principles developed in the realm of the Copenhagen process. This section should be understood as providing first insights rather than a similar thorough process tracing and empirical analysis as in the country cases.

exchange. Negative effects can be hindered with the right implementation of the instrument. The validation of non-formal and informal learning is seen as a chance for those 80 million European workers without formal qualifications but with work experience (ibid).

The Commission sees itself as being “quite important” in the field of VET and to be “the institution that takes most initiative” (interview EU_PUBL-5). The Commission is “a little bit surprised” that the large majority of member states treats EQF and ECVET as separate instruments (interview EU_PUBL-1). A Commission official expects that in the long run, around 2020, EQF will have stronger links to credits: “A European credit and qualifications system might not be inconceivable. (...) I expect that this should be the way to go, linking up qualifications frameworks and credit systems” (ibid). This is closely related to a call for the introduction of ‘flexible à la carte’ concepts (European Commission 2010: 4): VET systems should be “more flexible and modularised and should offer individualised learning pathways” (ibid, 8). As an interview partner from the European Parliament remarks, the Commission either does not believe that à la carte systems pose problems, or aims at leaving room for interpretation (interview EU_PUBL-3). It is clear that the Commission understands flexible pathways as an advantage for individuals changing pathways or careers, getting access to VET, upgrading skills, combining learning with having a family or with working, or making learning possible for individuals with disabilities. In general, with flexible pathways, individuals can move more easily (interview EU_PUBL-5). In line with this, flexibility is understood as flexibility “first of all of the systems, so that they don’t close doors (...)”. Also, flexibility is to let people learn at a time and a place which best suits them” (ibid). This also includes fostering modularisation. As another interview partner from the Commission (interview EU_PUBL-1) states:

It is a fact that people nowadays need to refresh their skills more often than they used to (...). So I think going towards a more modular approach will be just about necessary. This does require a credit-based approach. (...) There is more and more talk on flexible pathways in learning and in occupations because this is (...) an objective need. And certainly one tool to (...) react to this objective need will be modular systems, and then credit systems become the only way to make the link between the content and the formal recognition of the content. So this will be the necessary way to go.

The interview partner therefore clearly supports a combination of credit points, modularisation and flexible pathways. By portraying such policies as an “objective need”, instruments and principles are framed as technical instruments. As I showed above, this is not the case if instruments and principles are analysed against the background of a political economy perspective.

A sequence from an interview with another Commission official provides interesting insights, albeit the interview partner clearly states that it is a personal opinion and not an official EU position:

Interviewer	"In Germany, many people fear that the European processes will (...) lead towards (...) a modularisation of the VET system.
Interview partner	Would that be a (...) bad thing?
Interviewer	Well, would you say it's one of the intentions of the European Commission?
Interview partner	No, no I'm not saying that, no. But I really can't understand the argument, that's why would modularisation be a bad thing? Because I myself come from a system which is highly modularised, and I can't (...) see why it shouldn't be. This is my personal opinion. It opens so many possibilities, you can combine what you have learned, and then you find (...) your way in the labour market. (...)
Interviewer	Of course it is also the question how you understand modularisation, because it can refer to two different things. It can refer to (...) on the one hand (...) to different units within a VET course, but it would aim at a (...) full qualification, or on the other hand, secondly, modularisation could be a really flexible à la carte system.
Interview partner	Yes.
Interviewer	Of course that is two different things.
Interview partner	Yes. And I find both things quite good, but I (...) haven't really followed the German discussion on that so I don't want to take any position on that. (...) We know that in Europe there are systems which are almost, or to a very great extent, à la carte systems, and they cater very very well the special needs of different persons."

2.4 Conclusion

In this chapter, I argue that the instruments and principles developed within the realm of the Copenhagen process are biased towards general skills and liberalisation—and hence towards LME VET systems. Partially, instruments and principles are based on existing practices in LMEs. Another important finding is that the European Commission had envisioned the instruments to be even more challenging to CMEs. As regard to ECVET, I found that the Commission aimed at designing the instrument in a more far-reaching way: individuals ("Mr. X") would have had the opportunity to acquire modules in any member state and have these recognised as a full qualification in any (other) member state. In the end, European actors did not find the necessary support on the member state level for these proposals. In my interviews with the European Commission and my document analysis, I found that the European Commission still at least sees many advantages in flexible pathways, a combined qualifications and credit system, and an à la carte system.

Numerous authors, especially in Germany, argue that EQF and ECVET require a modularisation of the system. This opens the door for and might be combined with de-standardisation of training contents and assessments. As a consequence, such

institutional changes might lead to a dilution of CME VET systems, since employers might stop investing in broader industry-specific skills but pick and choose only those firm-specific skills they have an immediate need for. I conclude that modularisation *facilitates* the implementation of EU VET policies. Making qualifications more transparent and transferring them across Europe is easier with smaller units than with complex qualifications. I argue that an impact on the VET systems' core institutions is a possible outcome of the Copenhagen process in spite of the nature of the instruments as "soft law". Within the group of CME countries, there seems to be a difference in how far countries are challenged by instruments and principles endorsed by the Copenhagen process, with the question in how far VET provision is school-based being one decisive factor for this difference.

Yet, another important conclusion is that different assessments exist in the literature regarding the question if modularisation is a *necessary* precondition for the implementation of the instruments and principles developed within the realm of the Copenhagen process, especially since ample scope is left to member states regarding different options for implementation.

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