



15 April 2014

**Ministry of Education and Research
Sweden**

**Open consultation European Area of
Skills and Qualifications**

International Secretariat

The European Commission has launched a public consultation with the objective to collect different views on the problems faced by learners and workers with regards to the transparency and recognition of skills and qualifications when moving within and between EU member states, on the adequacy of the related European policies and instruments and on the potential benefits of developing a “European Area of Skills and Qualifications”.

The Ministry of Education and Research has considered the questions of the Commission in consultation with the Ministry of Employment.

The two ministries support joint efforts to increase transparency and understanding of the different national educational systems with the purpose of increasing mobility between countries, both for educational and professional purposes. However, in the consultation on a European Area of Skills and Qualifications it is not clear what the creation of such an area would entail. There is a lack of information about what the Commission would foresee with such an area. Creating a defined area encompassing all learning, risks leading to limitations, gridlocks and too vague instruments. We would also like to emphasize the necessity to involve both the education committee and the employment committee in this process at a very early stage.

In the development and restructuring of common European tools of this kind, it is necessary to carefully consider which work, processes and decisions are best dealt with at the national level and which actions would be beneficial to deal with on a European level. New and possibly bureaucratic structures on national and/or European level should be avoided.

Today there are a number of EU instruments in use in the area of education and training with the purpose of increasing the transparency of education and training learning outcomes, study/training periods, credits etc. to pupils, students, teachers, trainers and employers. Some of these instruments have been in use longer than others. The implementation of these instruments in the

member states takes time and for a number of the instruments it is premature to discuss revisions.

It is true that the instruments used need to be continuously developed, adapted and refined to become clearer and more efficient. However, we do not foresee a one-size-fits-all tool or method for all learning. There is a risk that broader tools applicable in several areas, will be more vague and less informative. However, it is important that the existing tools communicate and complement each other and improvements could be made to achieve this. At European level, we should support this process by ensuring consistency and encourage exchange of good practices.

The two ministries strongly support the learning outcomes approach focusing on competences and learning achieved rather than measuring input. It is important that the learning outcomes focus is reflected in the transparency tools.

Due to the structure of the education and training system in Sweden, it was difficult to give precise answers to a number of the questions in the consultation. Education in Sweden is steered by goals/learning outcomes defined at central level. The school system at primary and secondary level is under the responsibility of the municipalities, as well as adult education at basic and secondary level and Swedish tuition for immigrants. The municipalities are responsible for the follow up of and evaluation of their work.

Higher education institutions are responsible for tertiary education and enjoy a large degree of autonomy. Laws and ordinances set their legal framework and stipulate degrees in first, second and third cycle tertiary education and their requirements.

Higher vocational education is organized and run by a specialized agency, The Swedish National Agency for Higher Vocational Education (*Myndigheten för yrkeshögskolan*). The agency brings together all post upper secondary vocational education and training alongside university. For example, the agency administers higher vocational education programmes at tertiary level designed to meet the needs of the labour market in a wide range of vocational areas.

(For further details on the Swedish education system and organization, please see Eurydice.)

Trying to answer the questionnaire we encountered a number of challenges. The consultation is very broad, being an open consultation, and many of the questions were therefore wide and had a too large scope. Some questions, on the other hand, were very precise and more appropriate for experts in the specific field. Several of the questions could be interpreted in different ways depending on

the background and perspective of the person or organisation answering. This will have to be taken into account when drawing conclusions from the responses. In some cases respondents are obliged to reply yes or no even if they may not have fully understood a question and there are many different reasons for respondents to choose not to have any opinion. A number of the questions are biased and lead the respondent in the direction of a specific reply. The outcomes of this consultation should therefore be scrutinised in a very prudent manner.

The two ministries have done their best to fill out the questionnaire launched in the open consultation process on the Commission work with a European Area for Skills and Qualifications. However, a number of the questions put forward in the questionnaire are not entirely clear and some require further explanations or more elaborated answers. Below are therefore some additional comments to the answers presented in the questionnaire.

Specific comments to the questionnaire

Question 1

The inclusion of transversal skills in curricula and assessment practices are important in upper secondary education. Regarding higher education, the set up of curricula and assessment is a responsibility of the higher education institutions themselves.

Question 3

Decisions regarding the involvement of employers in the design of curricula are handled primarily at the local level.

Question 7

Such an initiative would be very costly, need constant updating and would risk leading to difficult gridlocks.

Question 9

The Ministry does not have much practical experience of this and would therefore like to refer to national authorities who work with these tools.

Question 10

A limited number of the tools could lead to less bureaucracy, but risk losing clarity and thus be less useful.

Question 14

SE would not like to have a co-ordination at European level but would see the added value of a discussion at European level to increase transparency.

Question 16

The legal framework for joint degrees still has to be national, but there is room for increased information sharing for better understanding.

Question 20b

A common definition of “unit of learning outcomes” and “credit” between higher education and vocational education and training would be difficult to achieve.

Question 20d

There is room for improvement when it comes to the current tools for the documentation of learning experiences. The current tools should be used and used in a correct manner.

Question 22

The main issue is that there is a documentation of the learning outcomes acquired in formal education. The current tools are quite established by now and it would not be necessary to have one single document for higher education and vocational education and training.

Question 26b

There are criteria established for recognition but the interpretation of these criteria are not entirely clear and can vary. Better and clearer information to ensure a more unified application of the criteria would be useful.

Question 31b

There should be a core of common European quality assurance principles for the provision of learning opportunities in higher education and vocational education and training, but not for compulsory education and upper secondary education.

Question 36

The Ministry does not have practical experience of all of these tools and would therefore like to refer to the national authorities and other actors for some of them.