

**CoESS comments on consultation of the social partners on the European Commission Staff Working Document “Towards a European Qualifications Framework for Lifelong Learning”.**

CoESS (Confederation of European Security Services) has always acknowledged the key importance of vocational training in the process of developing adequate professional levels for the industry. Already in 1996, CoESS emphasised the central role of improving standards of vocational training for the future of the private security industry. The 1999 European training manual for basic guarding also stated that without aiming to change any national training system, «vocational qualifications for basic guarding will form the starting point towards the development of professional standards in the private security service sector».

This idea is also clearly reflected in the Joint Code of Conduct signed by CoESS and UNI-Europa (European trade union representing services among which the private security) in 2003<sup>1</sup>. This Code places great importance on vocational training, not only on basic and specialised training but also, in particular, on ongoing training, since it is a way to update the professional skills and promote the career development of security officers.

A project on the Development of a European educational toolkit for three private security activities/profiles shall continue in the following months. The activities identified are 1) Mobile patrolling, 2) Alarm response centres and 3) Airport security. This project, aimed as the follow-up of the European Vocational Training Manual for Basic Guarding, has been introduced to and has got the necessary co-financing by the European Commission.

CoESS does not consider itself to be in a position to enter into details with regard to the legal implications of the present proposal of the Commission, in particular, the coherence with the Directives on Mutual Recognition adopted at the European level or the action undertaken at national level by the Member States. In any case, CoESS considers that the Working Document “Towards a European Qualifications Framework (EQF) for Lifelong Learning” is another step that can facilitate the transfer and recognition of the qualifications of individual citizens. In this sense, it corresponds to the long-term support that CoESS has given to this issue. In short, the EQF is an instrument that could be used to support and facilitate ongoing training.

As for the specific questions identified in the consultation document addressed to the Sectoral qualifications, CoESS considers the involvement of sectoral stakeholders in this process as an essential precondition in order for the EQF to become a practical and useful instrument. Private security is an extremely specific sector, highly regulated in a significant number of countries that have legal frameworks including particular basic and ongoing training obligations. Consequently, an in-depth analysis of the knowledge and the concrete matching of knowledge, skills and competences of the specific private security professional profiles is required. As the Working document states, this is a process that remains basically national. However, CoESS is convinced that the European Social Dialogue can play an indirect role. It would be essential that, while respecting the national competences, a specific profile analysed at European level (for instance, private security agent specialised in the field of mobile patrolling), contained in current or future national qualification frameworks, should be then matched to the same European Qualification. In this sense, coherence and co-ordination of national and European sectoral qualification frameworks remains a key element. In the event that this should not happen, CoESS fears that the EQF, instead of serving for developments at sector level, could make things even more difficult at mid or long term.

CoESS considers that, especially in some countries, the EQF can be used for a more systematic development of knowledge, skills and competences at sectoral level, as long as real sector agents are involved in the process. It is essential to map national qualifications across member states in order to establish comparability and compatibility, since a greater understanding, recognition and acceptance of the qualifications would be a positive step. On the contrary, should the process of the EQF be constrained to intersectoral agents at national level, the EQF has the risk of becoming not adjusted to reality.

Stakeholders at sectoral level need to be involved by taking part in the process as active agents - which eventually would take place at pure national level – as well as by adopting some positions in relation to activities already undertaken at European level. In this sense, CoESS could take the EQF as a reference, for instance, in the process of developing specialised training manuals in specific private security areas. Should a sector development take place, either at European or national level, it must be necessarily reflected in the improvement of national qualifications references. Participation of both European and national sectoral agents in the process is the essence to be considered.

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<sup>1</sup> Code of conduct and ethics for the private security sector – July 2003, jointly agreed upon by CoESS and UNI-Europa.