



## EUROPEAN COMMISSION

*Brussels, 21.12.2017  
C(2017) 8577 final*

*Dear President,*

*The Commission would like to thank the Bundesrat for its Opinion concerning the proposal for a Council Recommendation on tracking graduates {COM(2017) 249 final}.*

*The Commission proposal responds to the importance of improving the availability and comparability of data on education outcomes. Good quality data in this area can show the impact of education systems and of educational reforms; it can be useful in identifying and tackling skills mismatches; and it is important for stakeholders at all levels, including prospective students who are deciding what to study, teachers developing and delivering education programmes, and policy-makers steering education systems.*

*The points made in the Bundesrat's opinion are based on the Commission's initial proposal that was subsequently discussed in the Council's Education Committee. The Commission would like to inform the Bundesrat that the Recommendation was adopted by the Ministers of Education at the Education, Youth, Culture and Sports Council on 20 November 2017.*

*In order to respond more specifically to the particular concerns expressed by the Bundesrat, the Commission would like to clarify the following.*

*With regard to the concerns about the appropriateness of a European approach in this area, the Commission would like to underline that each Member State will decide how to implement graduate tracking, according to their national legislation, circumstances and resources. All commitments made by Member States will be voluntary.*

*With regard to the emphasis placed by the Bundesrat on exchange of information and experience, as well as cooperation between Member States, the Commission would like to point out that the network of experts representing all Member States will provide a forum for cooperation and mutual learning. This network will also explore options for developing comparable data. However, it will not replace political discussions in the Education Council and will not infringe on Member States' competence in education.*

*Mr Michael MÜLLER  
President of the Bundesrat  
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*With regard to concerns about administrative burden, the Council Recommendation states that Member States will report to the network of experts on a regular basis. This will ensure that Member States, through their representatives in the network, will decide on the extent and frequency of reporting.*

*With regard to data protection, in particular concerning linking data from different databases, such as revenue or social security, the Commission has taken note of the Bundesrat's concerns. The final text of the Recommendation makes it clearer that Member States are not obliged to take action that is not in compliance with their national data protection legislation.*

*Finally, concerning the inclusion of vocational education and training, the Commission considers that it is important to take into account comprehensive approaches covering different education and training sectors. In this regard, 12 Member States have planned or have ongoing reforms in graduate tracking in vocational education and training. However, it is recognised that vocational education and training in many Member States is not as well developed as higher education, and for this reason the proposal for Council Recommendation focused on capacity building support.*

*The Commission hopes that these clarifications address the issues raised by the Bundesrat and looks forward to continuing our political dialogue in the future.*

*Yours faithfully,*

*Frans Timmermans  
First Vice-President*

*Tibor Navracsics  
Member of the Commission*