



Final report on the impact analysis for Austria

Authors: Norbert Lachmayr, Roland Löffler

Vienna, 20.1.2012



National qualification system in Austria

The National Qualifications Framework (NQF) will greatly influence the educational landscape and, above all, the foundations of employee representations, so the basic theory goes. The impact analysis conducted as part of the Leonardo Da Vinci project PIN¹ shows several examples and the associated opportunities and also risks, especially for the Austrian situation.

In 2005 the European Commission published a working paper on a possible European Qualifications Framework (EQF).² When this is implemented, greater transparency and comparability of qualifications is expected and the aim is also for flexibilisation of qualification pathways with the transferability of qualifications. As a consequence, higher mobility of workers and trainees is expected.

The decision to introduce the EQF (and therefore implicitly to develop the NQF) was welcomed in Austria without much opposition:

“The tempting idea of using a meta reference system to make a success out of the previously unsuccessful efforts for facilitated comparability of qualifications between European member states has led to analogous expectations with regard to the subsystems of the Austrian education system which were previously controlled and observed in a much isolated fashion” (Schlögl 2009: 141).

The Federal Ministry for Education, Arts and Culture (BMUKK) and the Federal Ministry of Science and Research (BWF) are responsible for the development of a National Qualifications Framework in Austria. To coordinate the work, in 2007 an interministerial NQF project group was set up which is responsible for the strategic planning, controls the development process and is the contact point for everyone involved in and affected by this process (cf. Loisch/Tritscher-Archan 2010: 13). In addition, a national NQF steering group was established in which all federal ministries, social partners and federal provinces are represented. The NQR steering group is responsible for all important decisions made in the entire development process: the Austrian coordinating office for the NQF, set up at OeAD-GmbH / National Agency for Lifelong Learning, is working with the support of the European Commission on behalf of the national authorities (BWF, BMUKK) and was established in 2011. Areas of responsibility³ are “supporting the development and implementation of the NQF in Austria, setting up an internet-based NQF information system including NQF register, PR work, events and advice and creating networks at the national and European level.”

¹ 510698-LLP-1-2010-1-DE-LEONARDO-LNW. The project creates a network of employee representations and educational providers in 14 countries and raises awareness of the EQF (see www.eqf-pin.eu).

² SEK (2005) 957, Brussels 8.7.2005, see also Markowitsch/Schlögl/Schneeberger 2006

³ www.lebenslanges-lernen.at/home/nationalagentur_lebenslanges_lernen/nqr_koordinierungsstelle

In 2008 there was a national consultation process where all stakeholders in the education system were asked for opinions on a policy paper for a future NQF. This opportunity was used by around 300 institutions, including many trade unions⁴. Based on the evaluation of the submitted opinions by a group of experts, the national steering group began to elaborate a recommendation for the implementation of an Austrian NQF.

The development of the Austrian NQF is thus characterised by three “corridors” and concerns the classification of qualifications of the formal education system (Corridor 1), the non-formally acquired qualifications (e.g. Corridor 2 adult education) and the development of approaches for integrating qualifications which are allocated on the basis of informal learning processes (Corridor 3, e.g. learning on the job).⁵ Several pilot projects have also already been conducted for classifications in the sectors of construction, tourism, healthcare, electrical engineering and business/administration. The opinions led to the compromise that Bologna qualifications (i.e. bachelor, master and PhD) and qualifications outside the Bologna architecture are jointly possible at Levels 6 to 8, according to the principle of equivalence (“parity of esteem”) rather than equality. In this regard Mayr (2011: 150f) speaks of a signal effect in terms of the value of VET qualifications, which will have positive effects on the attractiveness of these qualifications. With this prospect on account of the NQF it will therefore be possible to continue with the particular features and strengths of Austrian VET in the tertiary sector. If the (national) classification criteria are reliable, comprehensible and objective, it should also be possible to establish a relationship between qualification levels previously not accepted as equivalent and therefore to improve the national rating of previously underrated qualifications (cf. Schlögl/Neubauer 2008: 16).

In technical terms, the Austrian National Qualifications Framework is divided into two parts at the highest three levels (“Y structure”), compatible with the Dublin descriptors. These characterise the respective levels of the four cycles using learning outcomes or competences.

⁴ See www.bmukk.gv.at/europa/eubildung/nqr/nqr_sn.xml

⁵ This ‘corridor’ idea was helpful at the start of development as a simplifying tool but actually contradicts the basic NQF idea that every qualification must be seen as independent of the educational provider/education and training input.



Fig.1: Representation of the Nat. Qualifications Framework

Level 8 Third Cycle, doctorate, PhD	Level 8
Level 7 Second cycle, master	Level 7
Level 6 First cycle, bachelor	Level 6
	Level 5 Short cycle, short studies
	Level 4
	Level 3
	Level 2
	Level 1

Source: *öibf*'s own table

This solution is based on a speech at the Council of Ministers on 18 November 2009, which does not conceal the results of the consultation process in 2008: “The stakeholders in general education, in vocational education and training and in adult education and also the social partners support the development and implementation of an Austrian National Qualifications Framework encompassing all areas of education.”

However the representatives of the HE sector demanded “... that Levels 6 to 8 be used solely for the qualifications of the Bologna process (bachelor, master, PhD).” The persistence of the HE sector ultimately led to a 9-month standstill in the development of the NQF for Austria and to the above compromise, which although not visible to outsiders, is very asymmetrical in the implementation of interests.

Source: “Setting up a National Qualifications Framework – implementation measures in the current legislative period”, speech at Council of Ministers; Vienna, 18 November 2009”

For his comments in the comment boxes, Bernhard Horak – one of the NQF experts of the Austrian Chamber of Labour – is thanked here!

In 2010 the criteria and procedures for the classification of qualifications were developed. With the current trial phase, these are now undergoing a first inspection: procedures for the classification of qualifications are being tested, an (evaluated and tested) basis for future classifications of qualifications for Corridor 1 is being elaborated and the critical moments in the procedure are being analysed. From January 2012 providers of formally acquired qualifications are to be given the opportunity to actually apply for classification. With this in mind, a (currently unpublished) NQF manual has been created for the trial phase to support bodies responsible for formal qualifications in creating their application for classification of qualifications from their area of responsibility on the NQF and serve as a basis for discussions for or against NQF classification. There were also corresponding information campaigns (“Road show on the NQF”)⁶, where a series of half-day events were held to address potential target groups from the areas of education and training, HE education, adult education and continuing education and training, as well as social partners and sponsors of education projects.

In the Austrian consultation process the representations of interests have been involved with success. The Austrian Trade Unions Federation (ÖGB) described this in the statement on the consultation paper (ÖGB 2008: 1): “As well as intensive involvement ahead of the creation of the consultation paper, (...) one particularly positive aspect which must be emphasised is that this was also launched with corresponding academic supervision and many information events which took place.”

References to the role of German trade unions in the development of the German qualifications framework show a different direction, however, and the influence of trade unions was perceived as “possible only to a limited extent” (cf. Schäfer 2008: 111) and the German trade Unions were insufficiently prepared for the challenges of Europeanisation in education policy at the time (Kuda/Strauß 2006: 630).

The implementation of the NQF in Austria

It is indisputable that the NQF has led to a (not only administratively and operationally extensive) need for regulation in the classification of degrees and qualifications (cf. Kutscha 2007, Wehmhörner 2009, Drexel 2005, DGbB 2005), with this mainly in terms of the identification, validation and certification of learning outcomes. It is also indisputable that the NQF in Austria may have solely an orienting and not a regulating function (BMUKK/BMWF 2008: 7f). The descriptions of the individual qualification levels are very general (cf. Lattke/Strauch 2011: 39), so the individual levels and characteristics must be first made concrete in (sector-specific) definitions and negotiated.

In this respect Austria has to establish different authorities⁷: the steering group (all federal ministries, representatives of the federal provinces and social partners) as the

⁶ <http://refernet.at/index.php/news/newsline/11-newsline/281-nqr-road-show-2011>

⁷ Working Group on Informal Learning 2010 (62)

highest body, an NQF coordination office (the *National Coordination Point* or *NCP*), and working groups, e.g. sub-working groups of the steering group and an own strategy group for the C2 (for qualification without a legal basis = C2).⁸ The latter assumes that bodies responsible for qualifications which are going to be newly created or already exist – and not the respective educational institutions or providers – approach the NQF office with corresponding qualifications and, on the basis of plausible learning outcomes, present a proposal for classification. Whoever will carry out the specific classification in C1 or can do the actual work is currently being examined in a legal appraisal. These bodies responsible for qualifications therefore needs to be authorised by NQF structures and well established in the qualifications landscape. Other prerequisites are independence, representativity for the branch/sector, expertise in the specific subject and correspondingly high mutual acceptance (internal within the branch, sectoral, transversal), because they are jointly responsible for or determine generally valid standards of qualifications (and usually also of competence identification procedures). The specific design of this partial segment of the NQF is currently being negotiated between the social partner organisations and the ministries.

With Great Britain, Ireland, Malta and France the first European countries have referenced their national frameworks entirely to the EQF and published extensive reports on the procedure and results (www.eqf-ref.eu). The Austrian Referencing Report is going to be published in March 2012 (cf. Mayer/Staudecker 2011) and will at least outline the planned procedure. It is planned because the implementation of the NQF is characterised by “ambitious schedules but incremental implementation or the stop-and-go principle” (cf. Schlögl 2009b).

Speedy development of the EQF with wide-reaching consequences?

The acceleration of the EQF by the European Commission is perceived as mainly fulfilling political⁹ and time targets but it is not sufficiently backed up empirically or (socio-)scientifically: Kuda/Strauß (2006: 630-634), for example, point out for Germany that originally “questions and problems of the design, practicability and implementation of instruments and procedures¹⁰” and “vocational education and educational policy considerations” were in the foreground. This means that possible social effects cannot be considered or assessed sufficiently: the companies’ perspectives and those of the employees hardly play a role in the debate, in addition possible effects on society (such as that people obtain a certain status or are assigned to a certain social class due to

⁸ cf. Schlögl 2009c

⁹ Goals according to Hanf/Rein in 2006 or Kremer in 2006 include facilitation of educational and labour market mobility by means of the transparency of learning contents and qualifications; greater permeability between the national education systems thanks to standardised awarding of credit points; greater permeability within the national education systems, between general education, vocational and HE-based education areas; promotion of lifelong learning by including informal learning.

¹⁰ e.g. differentiation of the levels, classification criteria for specific educational programmes, abstract Dublin descriptors lacking in practical relevance, can appropriately portray three times eight descriptors the complexity of individual learning processes, classification of vocational versus HE-based programmes. It is also questionable whether it is at all possible to formulate clear learning outcomes for all available educational programmes.



their profession; aspects related to development psychology and learning psychology of currently existing training forms; and also legal aspects like with job advertisements¹¹⁾ are ignored.

Meyer's criticism (2006: 5, quoted according to Erler 2009: 24) is also in this direction: "The EQF has been developed isolated from education and qualification research in many working group meetings with national experts. This theory and evidence-free design makes it seem questionable whether this system can appropriately portray the competences and qualifications which the historically and culturally grown national systems produce."

A classic argument, for example, is the question of how one-dimensional columns, which do not allow any branches or overlap, can portray the outputs which are to be recorded (knowledge, skills and competence) in a practical and consensual way. Furthermore, this should be comparable throughout Europe. It is clear that the different national qualifications frameworks of the involved European countries have to be adapted to the corresponding country-specific education systems. According to Ehrke (2006, 19) it is also confusing that an interlinking with other initiatives (e. g. European Language Portfolio, ECVET, ECTS) is not yet solved. For a critical "interjection on the non-transparency of the EU transparency instruments", see Diekmann (2011: 43f).

This condensed summary of the current instruments (EQF, NQF, ECVET, EUROPASS, ECSO, EU recognition directive) culminates in the call for overall control of the individual initiatives or in doubt about their benefits.

Indirectly relevant for trade unions in particular is the fact that the descriptors do not primarily come from VET but were derived from the Bologna process: as a result, it is argued that HE institutions dominate in the logic of descriptors, whereas professional and practical relevance are not taken into consideration sufficiently (cf. Ehrke 2006: 21). Therefore the VET school and college trade union (2008: 4) determined that Levels 5 to 8 should not be reserved exclusively for the HE sector. This has been taken into consideration accordingly in the current version of the NQF.

¹¹ Wehmhörner (2009) refers to possible legal consequences of consistent outcome orientation, e.g. in job advertisements and personnel decisions because, in terms of the principle of equality, it would essentially mean equivalence of all learning at every location of learning. Not only the start but also the end of an employment relationship can prove challenging: how do companies formulate a letter of recommendation where informally acquired knowledge of employees can be taken into consideration?

Occupational principle versus fragmentation of qualifications by the NQF

The main risk of an EQF from the trade union perspective is, according to Drexel¹² for example, in the gradual displacement and removal of the dual system because the EQF, with the outcome-orientation and fragmentation of integrated qualifications, is interpreted as being not compatible with the dual VET system.¹³ As a consequence the EQF leads to the “atomisation of vocational qualification” (Rauner 2005) and potential “destruction of dual VET” and the “erosion of specialist occupation-related labour markets” (Drexel 2005), there is a “tayloristic fragmentation” of the company-based work organisation (Drexel 2006) and a “sushi bar principle of freely chosen qualification portfolios” (Aff 2009). Kutscha (2007: 8) fears a “fragmentation of integrated qualifications into narrow qualification particles”, Bülow-Schramm (2008: 89) an “atomisation of knowledge” and a “precisely-fitting qualification with high velocity of decomposition.”

This different choice of words refers to a shared circumstance (cf. Kuda/Strauß 2006: 632f): employability, i.e. the sufficient availability of “flexibly designed, flexibly applicable and individually certifiable partial qualifications which are developed and taught according to changing company requirements and individually different prerequisites”, is diametrical to occupational capacity¹⁴ in the form of recognised, institutionally regulated vocational qualifications. These need to

“qualify to work with extensive professional competence going beyond individual workplaces and branches and be connected with structured employment and career patterns and the integration into the existing wage system and social legislation.”

The opportunity to strengthen occupational capacity can now be seen in that – thanks in particular to the NQF – the established added value of professional competence can be made more transparent than before: the social partners, recently above all the trade unions, are traditionally proponents of occupational capacity and argue accordingly that in dual VET, for example, more is taught than just the sum of learning contents

¹² As advantages of the dual system Drexel (2005: 11) indicates the following: “The central characteristics of the dual system are the breadth and complexity of the qualifications, interlinking of theoretical and practical learning, occupational relevance of the training and socialisation processes, ensuring recognition of the generated qualification profiles in the entire German labour market by means of their standardisation and also the social responsibility of the state and wage partners for the inputs of the training and their control.”

¹³ Drexel (2008: 5f): *In place of a training process over several years with fixed contents and defined tasks of the company, part-time vocational school and possibly supra-company training establishment would be a learning process controlled only by the individual company, educational provider or youth, often also only a random sequence of unconnected learning processes in school-based or private educational establishments or companies. The synergy effects of a well thought-out sequence of learning steps would no longer exist. In place of the broad (“integrated”) vocational qualifications would be narrow partial qualifications and patchwork profiles (...). In place of the competence in an occupation, i.e. in many related activities, and the ability to continue to develop in the field of this occupation would be competences to handle individual “activity situations” (i.e. workplaces).*

¹⁴ For the historical development of the occupation see also: Löffler, Roland (2011): Ausbildungsinhalt, Anforderungsprofil oder berufliches Selbstverständnis. In: Schlögl, Peter/Dér, Krisztina: Berufsbildungsforschung. Alte und neue Fragen eines Forschungsfeldes. Bielefeld: transcript, 115-124. For more details on the theme of “the occupational principle and capacity” see also the literature research of Linten (2009).

according to the framework curriculum (cf. IG Metall 2006: 7), i.e. it is only the entire training that enables corresponding professional competence. At the same time the social functions of dual training (in the area of guidance, social integration, identity formation, for example) are also addressed. Maintaining the occupational principle therefore requires strategic expansion of the strengths of the dual system and requires clear orientation towards the goal of positive further development of the dual system. Possible discussions about the classification of teaching at an NQF level (irrespective of the area specialisation) can be cushioned with the possibility of higher qualification with corresponding professional experience.¹⁵

Meyer (2006: 13) also sees problems from an impending loss of job profiles if corresponding negotiations and collective agreements are needed on a new, highly differentiated system of competence characteristics. For example, it has to be questioned to what extent reaching a level will be affected by wage and salary effects – the comment that the NQF does not intend any individual classification of individual persons will probably not be covered enough in the debate. As a worst case scenario the remuneration, in view of the multiplication of the qualification profiles, could no longer be aligned towards a few wage groups (metal workers). The remuneration of similar qualification fields could clearly differentiate and, instead of by collective agreements, could be determined by individual negotiation processes. Collective agreements, the identification element of trade unions, would lose their significance (cf. also Baron 2007: 152).

Changed training market with or without direct possibility of control?

According to Drexel (2008: 4), some of the current training companies could, in view of the opportunities of acquiring partly qualified labour, relinquish or reduce dual training immediately because of flexibility and cost interests. The feared accumulation of partial qualifications without reference to recognised vocational qualifications could, from the perspective of IG Metall, also mean that the training could also increasingly be carried out by private establishments not controlled by the public: Modules are ultimately “cohesive, clearly marked-out qualification programmes (...) which could be taught under many different conditions at many different learning locations (...) and at many different times” (cf. *IG Metall 2006: 8*).

An option to counter this would be restricting the classification of training programmes to a purely curricular modularisation and prohibiting the certification of the results of individual learning stages. Additional qualifications, however, do not fragment integrated vocational qualifications but rather “complement or differentiate them on the basis of a shared foundation. The use of curricular modules for the purpose of complementing or finely differentiating integrated vocational qualifications must not be confused with their

¹⁵ How and when higher qualification and professional experience can lead to higher classification in the NQF is being examined in a current project (Löffler/Lachmayr 2012) where the careers and responsibilities of commercial and business college graduates are analysed.

classification into narrow skill sets,”¹⁶ explains Drexel (2005: 115). In this respect Schlögl/Neubauer (2008, 12f) indicate that an increase in efficiency in the education sectors and lower “career losses” over the lives of learners are to be expected if it proves possible to integrate partial qualifications in a modular system for generally accepted full qualifications.

“If modules are designed in the sense of accumulable elements of a full qualification, this opens up opportunities to support individual and efficient educational careers which are now also proven with certificates, which are relevant for the labour market or are recognised in the education system.”

In connection with an expected increase in private VET and CVET offers and the tendency towards relief in the privatisation of IVET, it must be considered that at the moment the state and the social partners control the VET and CVET landscape with legal and financial support for training processes in order to help bring about the best-possible educational justice. However, if only the output in the NQF is considered, according to Drexel (2006: 17) actually it would be necessary to

“legally specify learning inputs by adopting training regulations which aim to ensure certain learning objectives are reached and require corresponding control regulations, to disappear on account of being alien to the system. With such a system change there is also no longer an obligation of the state (...) to financially support training. Public regulations and funding have to concentrate on processes and authorities for identifying, assessing and certifying skills.”

Hanf/Luomi-Messerer/Rein (2009: 21) therefore point out that especially trade unions (e.g. ÖGB 2008: 6) and educational institutions are expressing concern about the disconnection of qualifications and institutions by proclaiming learning outcome orientation and, for reasons of quality assurance, are advocating careful consideration of input factors in the operational design of the qualifications framework. This becomes more and more important especially when people, in particular youths, themselves become responsible for shaping their training career, for selecting and acquiring the qualifications which are to be accumulated. Social parties and the state would be relieved from their co-responsibility for the necessary inputs into the training of the upcoming labour force and for its structure and quality (cf. Kunze 2008: p. 8). In terms of a social permeability of the education system this would be precarious.

¹⁶ Accordingly IG Metall advocates/advocated the concept of European core occupations (cf. Spöttl 2006; Heß/Spöttl 2006) where the European countries need to agree on a shared core of required competences for every occupation. Specialisations could also be considered in principle, however: the VET school and college trade union (2008: 2) advocates very restrictive handling when including partial qualifications (above all additional and special qualifications) in the NQF: “Partial qualifications should primarily be treated as preliminary stages of the main qualification or as an additional qualification. Merely linking together partial qualifications without at least one main qualification must not lead to a relevant level classification.”

The Working Group on Informal Learning in 2010 (13) points out critically that the establishment of a qualifications framework in which existing training pathways are allocated to certain levels “by itself does not contribute to increasing transparency and also permeability”.

Egger (2009) fears that by recognising non-formal/informal learning alone, the exclusion risks of people less likely to participate in education will not be reduced because socio-economic access barriers continue to exist. Also informal learning at the workplace is certainly rarer with activities of poorly qualified people than among those with higher qualifications. In addition, according to Erler (2009), formal education in the NQF is still rated more highly than other training pathways. From the opinions on the NQF, for example, it can be seen that all educational sectors (apart from adult education) comment carefully on the recognition of non-formally/informally acquired learning outcomes if entitlements to further qualification or the exercise of a profession are connected with this.

Schlögl/Neubauer (2008: 14) also see the opportunity for more permeability in the fact that the NQF gives the option of making individual competence development more easily visible:

“The significant number of dropouts could [...] be given the opportunity to make their particular competence development status provably more transparent for themselves and also for others (employers, training establishments). This could have a positive influence on their entry into employment and/or their new start of educational processes.”

Overall the ÖGB, like the other social partner organisation, has positively assessed the entire project because it enhances transparency in the increasingly confusing VET and CVET field, in particular for individual citizens. In the medium term, however, the benefit of the reference frameworks will have to be measured based on the extent to which they actually gain in importance in the lives of people. This has to be manifested, for example, in the visualisation of qualifications outside the formal paths and in easier credit transfer and permeability on to higher qualification and CVET. Such learning outcome orientation is also definitely seen as an approach which could be effective for motivating people to pursue an education. And according to Schlögl (2011, 162) the learning outcome approach could also give new impetus in an “education debate which has come to a standstill in normative trench warfare”.

Countering concerns

The concerns and fears which mainly employee representations associate with the EQF/NQF system have always accompanied the developments so far. They are numerous and it seems they are almost entirely listed or described without much effort in this article. Only “almost entirely” because there was no reference to the danger that the EQF could also promote “harmonisation” of the education systems.

For proponents of this hypothesis it has been clear for a long time that transparency and comparability also lead to approximation of the systems sooner rather than later and that of course this is “downwards”, which means the risk is doubled. It must also be said, however, that the sceptics and critics speak up mainly in publications and studies. Neither in practical discussions in Austria nor at the European level, for example as part of the Advisory Committee on Vocational Training (ACVT), are such statements from employees documented in any form.

All fears – whether the impending fragmentation of qualifications, the removal of the dual system, the implications for collective agreement policy or the loss of state supervision of the IVET systems – have one central argument against them: the NQF should not and cannot replace either an active education policy or legislation. The NQF is an instrument for the promotion of transparency, comparability and permeability which states of the European Union implement voluntarily.

The design of the content, structure and teaching of education and training remains in the autonomy of the individual states; in the case of IVET this is traditionally in close coordination with the social partners. It is also left to every state to decide how much it works together with other stakeholders to safeguard and further develop IVET.

New “homework” for educational providers?

The non-formal qualifications taken into greater consideration by the NQF require the increasing professionalism of adult education institutions in terms of how they deal with the NQF issue. With strategic coordination, the many individual events of adult education institutions could be merged into qualifications which can be integrated in the NQF and coordinated better. This not only gives precisely-suited offers for customers according to their already acquired knowledge, the educational provider itself also has a strategic focus and an educational orientation which can be communicated to the outside more easily. At the same time the learning outcome orientation could also be used to motivate people to pursue an education because at the end of the CVET measures the output can be made visible by the NQF classification. This of course requires corresponding NQF professionalism and, above all, corresponding development work at the educational providers with the associated financial and bureaucratic expenses for adult education institutions.

By including non-formal qualifications in the NQF, the Chamber of Labour expects fundamental advantages for CVET: “The NQF would therefore be a great opportunity to bring the ‘patchwork’ of CVET and adult learning in Austria into a national structure, through which overall it could gain ground and ‘recognition’ in the broadest sense over the domain of the formal system.”

Horak, Bernhard (2009): Qualifiziert für Europa. In: Arbeit & Wirtschaft (5/2009), p. 29.

With all these possible changes, will those CVET programmes which cannot be integrated in the NQF also be reappraised, i.e. will this CVET possibly be experienced as less “valuable” and therefore less in demand? Or does it concern (as assumed) such a large number of programmes that there will be two complementary CVET markets, i.e. with and without NQF affinity, alongside each other? In this case it would be undesirable that programmes which are not compatible with the NQF become less significant: according to the annual report of the Working Group on Informal Learning (2010), the significance of an educational programme must not be measured by whether or where it is contained in the NQF. An (un)intentional devaluation by learners and also providers or sponsors could affect open and therefore often easily accessible programmes without certifications, for example.

Also interesting is the discussion – which has been ongoing for several years – about the concept of quality in CVET. The latest result, for example, is the new Austria-wide quality framework for the recognition of quality in adult education (Ö-Cert). This has the goal of ensuring mutual recognition of quality assurance measures of educational organisations between the individual Austrian provinces and between the federal government and the provinces. Management systems like ISO 9000 and the new ISO 29990 procedures for learning service providers must also be mentioned as examples. But it is clear that it is not only CVET providers that need to become certified: for individuals, greater certification activities are also expected with a “lively” NQF. Egger (2009) fears, for example, that – with the NQF concentrating on the generation of proofs of competence – this will lead to a “lifelong testing and accreditation procedure”. In its statement on the NQF consultation paper (2008: 6), the Austrian Trade Unions Federation in this respect refers to the “many years of demanding that (...) the achievement and assessment of learning outcomes outside the formal education system must be free of charge with comparable qualifications.”

Summary and outlook:

Many challenges and opportunities have been shown for the Austrian VET and CVET system. From a trade union perspective in particular there are, all in all, several areas looming (cf. Schlögl/Neubauer 2008: 4) which must be rated as sensitive: for example it is essential that, with the NQF, existing regulations which protect and benefit employees in terms of CVET also continue to exist, the opportunities to influence of employees and their representations or learners are not curtailed, the collective agreement autonomy is maintained and it is ensured that national qualifications are not undervalued in an international comparison. It is also recommended to ensure that excessive bureaucratic mechanisms and therefore additional costs for employees are prevented and that the already unclear education system does not become more intransparent.

As well as this “defence” of the risks, for the representations of interest the introduction of EQF/NQF is also associated with many opportunities at the same time if it



demonstrates employee-related matters and matters of importance for trade union policy and conscientiously checks one or two forms for the design of institutions, guidelines or procedures, as well as shows their consequences: the enhancement of permeability and mobility in the education system, better integration of less formalised areas of VET and CVET (e.g. competences acquired at the workplace), a reduction in the number of people without a qualification, more careful dealing with the lifetime of people and also the increase in value of VET compared with education and higher learning.

How these opportunities and challenges can be handled at the European level is the next step in the Leonardo da Vinci PIN project: results of discussion rounds among the partner countries and also corresponding impact analyses aim to provide an overview of good practice in the sense of including employee representations and educational establishments in the EQF/NQF. Maybe an approximate value can then also be found for calculating with many unknown quantities:

[EQF x (NQF+Output)/8 – Input + ECVET = mc²].

Bibliography:

- Arbeitsgruppe Informelles Lernen (2010): Jahresbericht 2009/2010. Eine Arbeitsgruppe im Rahmen des Instituts für Wissenschaft und Kunst (IWK). Wien.
- Baron Sonja (2007): Das duale System der Berufsausbildung unter dem Einfluss der europäischen Berufsbildungspolitik. Entwicklungsprozesse und Herausforderungen, http://duepublico.uni-duisburg-essen.de/servlets/DerivateServlet/Derivate-18575/Dissertation_Sonja_C_Baron_final.pdf (Stand: 10.11.2011), S 157ff
- Bericht der Expertengruppe (2008): Konsolidierung der Stellungnahmen zum Konsultationspapier zum österreichischen Nationalen QualifikationsRahmen (NQR).
- BMHS-Gewerkschaft (2008): Stellungnahme: Nationaler Qualifikationsrahmen. Feststellungen im Rahmen der NQR-Konsultation.
- Bülow-Schramm, Margret (2008): Nationaler Qualifikationsrahmen in Deutschland – Auswirkungen auf Hochschulen und Berufsbildung. In: Neß, Harry/Kimmig, Thomas: Kompendium zu aktuellen Herausforderungen beruflicher Bildung in Deutschland, Polen und Österreich. Vorarbeiten zu einem europäischen Handbuch, S 88-91.
- Bundesministerium für Unterricht, Kunst und Kultur (BMUKK) Abt. V/8 - Erwachsenenbildung (2008): Stellungnahme zum Konsultationspapier "NQR für Österreich".
- Bundesministerium für Unterricht, Kunst und Kultur (BMUKK), Bundesministerium für Wissenschaft und Forschung (BMWF) (2008): Konsultationspapier NQR, www.bmukk.gv.at/medienpool/15830/nqr_konpap_08.pdf (Stand: 10.11.2011).
- Deißinger, Thomas (2008): [Von Berufsprinzip bis Zertifizierungshoheit](#). Spannungsfelder auf dem Weg zum Deutschen Qualifikationsrahmen (DQR). DIE Zeitschrift 2008/4, S 25-29.
- DGB (2005): Stellungnahme des Deutschen Gewerkschaftsbundes (DGB) zum Konsultationsdokument „Der Europäische Qualifikationsrahmen - Ein Transparenz-Instrument zur Förderung von Mobilität und Durchlässigkeit“, 6.12.2005.
- DGB-Bundesvorstand Bereich Bildung, Qualifizierung, Forschung (2009): Der Deutsche Qualifikationsrahmen (DQR). Chancen und Risiken aus gewerkschaftlicher Sicht.
- Diekmann, Knut (2011): Wie viel Intransparenz vertragen die EU-Transparenzinstrumente? In: DIE, Zeitschrift für Erwachsenenbildung, 3/2011: DQR Herausforderung, S 43-44.
- Drexel, Ingrid (2005): Das Duale System und Europa. Ein Gutachten im Auftrag von ver.di und IG Metall.
- Drexel, Ingrid (2006): Europäische Berufsbildungspolitik: Deregulierung, neoliberale Reregulierung und die Folgen - für Alternativen zu EQR und ECVET. In: Grollmann, Phillip/Spöttl, Georg/Rauner, Felix. (Hg.): Europäische Berufliche Bildung- eine Gestaltungsaufgabe, Münster.
- Drexel, Ingrid (2008): Berufsprinzip oder Modulprinzip? Zur künftigen Struktur beruflicher Bildung in Deutschland, in: Verband der Lehrerinnen und Lehrer an Berufskollegs NW: Berufskollegs stärken heißt die berufliche Bildung zu stärken, Krefeld.



- Ehrke, Michael (2006): Der Europäische Qualifikationsrahmen – eine Herausforderung für die Gewerkschaften, BWP 2/2006, S 18-23.
- Erler Ingolf (2009): Die allgemeine Erwachsenenbildung und der nationale Qualifikationsrahmen. Wien: ÖIEB
- Erler, Ingolf (2009): Integration nicht berufsorientierter Erwachsenenbildung in den NQR. Wien: ÖIEB
- Hanf, Georg/Luomi-Messerer, Karin/Rein, Volker (2009): Österreich und „gleichgesinnte“ Länder. Ergebnisse aus dem internationalem Projekt TransEQFrame. In: Markowitsch, Jörg: Der Nationale Qualifikationsrahmen in Österreich: Beiträge zur Entwicklung, S 21.
- Heß, Erik; Spöttl, Georg (2008): Kernberufe als Baustein einer europäischen Berufsbildung. In: BWP 4/2008, S 27-30, www.bibb.de/veroeffentlichungen/de/publication/show/id/1369 (Stand: 10.11.2011).
- IG Metall Vorstand (2006): Modularisierung zerstört Strukturen ohne bessere aufzubauen oder Nur wer den Blick für das Ganze hat, wird das Ganze auch erkennen. Positionspapier der IG Metall zur aktuellen Modularisierungsoffensive des BMBF.
- IGM (2005): Auf der Suche nach Transparenz in der Europäischen Berufsbildung - Was ist ECVET und wie gehen wir damit um?
- Koreimann, Astrid; Hackl Wilfried (2010): Nationaler Qualifikationsrahmen und Erwachsenenbildung, <http://erwachsenenbildung.at/themen/nqr> (Stand: 10.11.2011).
- Kuda, Eva/Strauß, Jürgen (2006): Europäischer Qualifikationsrahmen - Chancen oder Risiken für Arbeitnehmer und ihre berufliche Bildung in Deutschland? In: WSI Mitteilungen 11/2006, S 630-637.
- Kunze, Katharina (2008): Entwicklung und Etablierung europäischer Instrumente für die berufliche Bildung - Verlauf des europäischen Leistungspunktesystems.
- Kutscha, Günter (2007): Nationale Berufsbildungspolitik vor neuen europäischen Herausforderungen. Perspektiven progressiver Bildungsreform im Brügge-Kopenhagen-Prozess. In: Gewerkschaft Erziehung und Wissenschaft (GEW) NRW: Berufskollegtag 2007. 22. Februar 2007. Neue Anforderungen in der beruflichen Bildung in NRW. Essen 2007, S. 33-50.
- L³Lab-Blog (2010): Online-Dokumentation der Tagung "Nationaler Qualifikationsrahmen (NQR) und Erwachsenenbildung. Risiken und Chancen" am Bundesinstitut für Erwachsenenbildung, 09. und 10. Dezember 2009.
- Lattke, Susanne/Strauch, Anne (2011): Ein sektoraler Qualifikationsrahmen für die Weiterbildung. In: DIE, Zeitschrift für Erwachsenenbildung, 3/2011: DQR Herausforderung, S 39-42.
- Linten, Markus (2009): Literaturrecherche: Berufsprinzip / Beruflichkeit, www.kibb.de/cps/rde/xbcr/SID-3C5594CA-6371820E/kibb/Berufsprinzip.pdf (Stand: 10.11.2011).

- Löffler, Roland (2011): Ausbildungsinhalt, Anforderungsprofil oder berufliches Selbstverständnis. In: Schlögl, Peter/Dér, Krisztina: Berufsbildungsforschung. Alte und neue Fragen eines Forschungsfeldes, S 115-124
- Markowitsch, Jörg/Schlögl, Peter/Schneeberger, Arthur (2006): Europäischer und nationaler Qualifikationsrahmen. Stellungnahmen zum Arbeitsdokument der Europäischen Kommission sowie erste Befunde für Österreich.
- Mayr, Thomas (2011): Leistungen und Perspektiven der Berufsbildung in Österreich. In: Gerhard Niedermair (Ed.), Trends und Zukunftsperspektiven beruflicher Aus- und Weiterbildung. Impulse, Perspektiven und Reflexionen (S 135-152). Linz: Trauner.
- Mayer, Stephanie/Staudecker, Eduard: The National Qualifications Framework in Austria – background, objectives and current state of implementation. In: Austrian education news 66, July 2011. BMUKK (ed.). www.bmukk.gv.at/medienpool/20994/aen_66.pdf (Stand: 10.11.2011).
- Meyer, Rita (2006): Besiegelt der Europäische Qualifikationsrahmen den Niedergang des deutschen Berufsbildungssystems? In: Büchter, Karin/Gramlinger, Franz (Hrsg.): Qualifikationsentwicklung und -forschung für die berufliche Bildung. bwp@ Ausgabe 11/2006. www.bpat.de/ausgabe11/meyer_bwpat11.pdf (Stand: 10.11.2011).
- Meyer, Rita (2006): Besiegelt der Europäische Qualifikationsrahmen den Niedergang des deutschen Berufsbildungssystems?, in: Qualifikationsentwicklung und -forschung für die berufliche Bildung, bwp@ Ausgabe Nr. 11, www.bwpat.de/ausgabe11/meyer_bwpat11.pdf (Stand: November 2011).
- Neß, Harry (2009): Stand und Erwartungen nationaler, supranationaler und internationaler Kompetenzfeststellung. Grundsätzliche Problemstellungen und Herausforderungen unter Einbeziehung der Diskussion um den Europäischen (EQR) und den Nationalen Qualifikationsrahmen (NQR). www1.abpaed.tu-darmstadt.de/arbeitsbereiche/ruetzel/studium_lehre/ws0910/kolloq/downloads.tud (Stand: 10.11.2011).
- Obidniak, Dorota (2008) Einschätzungen zur Erarbeitung des polnischen Qualifikationsrahmens. In: Neß, Harry/Kimmig, Thomas (Hrsg): Kompendium zu aktuellen Herausforderungen beruflicher Bildung in Deutschland, Polen und Österreich. Vorarbeiten zu einem europäischen Handbuch, S 98-100.
- ÖGB (2008): Stellungnahme des Österreichischen Gewerkschaftsbundes zum „Konsultationspapier-Nationaler Qualifikationsrahmen für Österreich“, 4.7.2008.
- Schäfer, Tobias (2008): Die Konsolidierung des europäischen Berufsbildungsraumes. Die Berufsbildungspolitik der Europäischen Union im Kontext der Globalisierung und einer notwendigen Internationalisierung beruflicher Aus- und Weiterbildung.
- Schlögl, Peter (2008): Perspektiven des nationalen Qualifikationsrahmens in Österreich: Vertikale Durchlässigkeit und Anerkennung informellen Lernens. In: Neß, Harry/Kimmig, Thomas (Hrsg.): Kompendium zu aktuellen Herausforderungen beruflicher Bildung in Deutschland, Polen und Österreich. Vorarbeiten zu einem europäischen Handbuch, S 94-97.



- Schlögl, Peter (2009): „...die Speisekarte anstelle der Mahlzeit zu essen ...“. Dier Qualifikationsrahmen und die Gefahr eines Irrtums der logischen Typisierung. In: Stock, Michaela (Hrsg.): Entrepreneurship-Europa als Bildungsraum-Europäischer Qualifikationsrahmen. Festschrift für Dieter und Gerwald Mandl, www.uni-graz.at/wipwww-13schloegl_speisekarte.pdf (Stand: 10.11.2011). Wien: Manz, S. 141-150.
- Schlögl, Peter (2009b): Stand der Entwicklungsarbeiten des NQR in Österreich. Eine kritische Bestandsaufnahme, www.kibb.de/cps/rde/xbcr/SID-4D776243-0D3001ED/kibb/KS2011_TB3_Schloegl.pdf (Stand: 10.11.2011).
- Schlögl, Peter (2009c): Strategiepapier zur Integration des nicht-formalen Lernens in den künftigen nationalen Qualifikationsrahmen, i.A. des BMUKK.
- Schlögl, Peter (2011). Entität und Relation von Lernergebnissen als Herausforderung bei der Konstruktion von Qualifikationsrahmen. In Gerhard Niedermair (Ed.), Trends und Zukunftsperspektiven beruflicher Aus- und Weiterbildung. Impulse, Perspektiven und Reflexionen (S 153-164). Linz: Trauner.
- Schlögl, Peter/ Neubauer, Barbara. (2008). Herausforderungen und Chancen der EQR- und ECVET-Konzeptionen für das österreichische Qualifizierungssystem und gewerkschaftliche Bildungspolitik. Wien: ÖIBF.
- Spöttl Georg (2006): Europäische Kernberufe – nach wie vor eine Perspektive für eine europäisierte Berufsbildung? In: Grollmann, Philipp/Spöttl, Georg/Rauner, Felix: Europäisierung beruflicher Bildung – eine Gestaltungsaufgabe.
- Wehnhörner, Uwe (2009): „Acht Stufen“ zum Deutschen Qualifikationsrahmen - DQR! Der Europäische und der Deutsche Qualifikationsrahmen werden nicht nur die berufliche Bildung verändern, Referatsunterlagen GEW-Berufsschultag.