

Recommendation issued by the Board of the Federal Institute for Vocational Education and Training (BIBB) on 28 June 2011 regarding the classification of the general qualification for entrance to higher education in relationship to vocational certificates and in comparison to other European countries

1. Preliminary remarks

At its meeting held in March 2011, the BIBB Board noted that the work done to date to develop the German Qualifications Framework (GQF) had been assessed as positive on the whole and recommended that the stakeholders in the vocational education and training field should continue to play an active role in the development of the GQF. At present, the discussion regarding the continued development of the GQF revolves around the classification of the *Allgemeine Hochschulreife* (general, unrestricted qualification for entrance to higher education) in relation to vocational qualifications. The members of the BIBB Board consider it necessary to comment on this.

2. Classification of the *Fachhochschulreife* and the *Allgemeine Hochschulreife*

A central issue in the current discussion regarding the continued development of the GQF is the possibility that a differentiation will be made between the *Fachhochschulreife* (qualification for entrance to universities of applied sciences) and the *Allgemeine Hochschulreife* (general, unrestricted qualification for entrance to higher education) with the result that they would be assigned to two different levels. The School Committee of the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) has proposed a system for assigning to the individual GQF levels school leaving certificates from schools that provide a general education. In this system, the *Fachhochschulreife* would be assigned to level 4 of the GQF while the *Fachgebundene Hochschulreife* (qualification which entitles the holder to study a specific subject at any institution of higher education in Germany) and the *Allgemeine Hochschulreife* would be assigned to level 5. The members of the BIBB Board do not consider this differentiation to be logical.

According to the Agreement on the Organisation of the Upper Level of Academic Secondary Education (resolution adopted by the Standing Conference of the German Ministers of Education and Cultural Affairs of the States of the Federal Republic of Germany on 7 July 1972 in the version dated 1 October 2010), the *Allgemeine Hochschulreife* is the "school leaving qualification which permits the holder to study any subject at a university and undergo comparable vocational training". Thus the objective of this education is to generally

enable the individual to study at university and to prepare him or her for an occupation and the working world. Therefore the *Allgemeine Hochschulreife* can be called the basic qualification for the academic and/or vocational education system. This is also true of the *Fachhochschulreife* which entitles the holder to study at a university of applied sciences or enrol in a corresponding degree programme at a university. This makes the *Fachhochschulreife* the third type of university entrance qualification in the German school system, alongside the *Allgemeine Hochschulreife* and the *Fachgebundene Hochschulreife*.

The BIBB Board therefore holds that assigning the *Allgemeine Hochschulreife* and the *Fachhochschulreife* to two different levels is not justified. A further argument against assigning the *Fachhochschulreife* and the *Allgemeine Hochschulreife* / *Fachgebundene Hochschulreife* to two different GQF levels is the fact that this would introduce at the level of the entrance qualification a differentiation which does not exist at the level of the degree programmes for which the respective entrance qualification applies. In the case of bachelor's and master's degrees, no differentiation is made between degrees that are earned at a university and degrees that are earned at a university of applied sciences.

For this reason, a differentiation between the *Fachhochschulreife* on the one hand and the *Fachgebundene Hochschulreife* and *Allgemeine Hochschulreife* on the other hand does not appear to be consistent. These qualifications should all be classified as forms of qualification for entering university and thus assigned to one single GQF level.

In addition, the qualification level described in the aforementioned Agreement on the Organisation of the Upper Level of Academic Secondary Education does not tally with the requirements set forth in Level 5 of the German Qualifications Framework. This is clear for example from a comparison with the general description of Level 5 and the GQF descriptors Skills, Social Competence and Autonomy. For instance, Level 5 requires the individual to be able to autonomously plan and process comprehensive technical tasks that are assigned in a complex, specialized field of study or field of occupational activity that is subject to change. It is highly doubtful that qualification entitling the holder to enter university fulfils this requirement. This is particularly the case with the descriptor Social Competence. The School Committee considers Level 5 to have been reached "when pupils who acquire the *Allgemeine Hochschulreife* learn using collaborative forms of work, assume responsibility for the joint learning process, provide and accept assistance, and observe rules and agreements" (see the Proposal of the School Committee of the Standing Conference of the German Ministers of Education and Cultural Affairs 12/2009, *Allgemeine Hochschulreife*). In the vocational training field, this level of social competence is already required for entry-level training programme which have been assigned to Level 2 of the GQF on a consensual basis.

Thus the GQF descriptors do not provide a substantive argument for assigning the *Allgemeine Hochschulreife* to Level 5. Assigning the *Allgemeine Hochschulreife* to such a high level would also go against the concept of lifelong learning. This would suggest that more than 60 per cent of the potential education that an individual could obtain would already have been attained with the *Allgemeine Hochschulreife* - a qualification issued by a general secondary school - although an individual holding an *Allgemeine Hochschulreife* would only be in possession of the fundamentals needed for vocational training. In light of this, it would be sensible to assign the *Hochschulreife* to Level 4 as a rule, insofar as certificates that are issued by general secondary schools are to be included in the GQF at all.

3. Classification of the dual vocational training system

The aim of vocational training is to teach vocational competence. The Vocational Training Act describes this as follows: " Initial training shall, through a systematic training programme, impart the vocational skills, knowledge and qualifications (vocational competence) necessary to engage in a form of skilled occupational activity in a changing working world. Initial training shall also enable trainees to acquire the necessary occupational experience." (see Section 1 (3) of the Vocational Training Act).

For all nationally-regulated training regulations, the 'starting situation' for developing vocational competence is based on complex, intransparent, dynamic problems which arise in everyday working life. This training objective (or this required level of vocational competence) - the ability to handle and solve complex problems from everyday working life after successfully completing vocational training - applies equally to all training regulations. During the first step in the assignment process, this objective justifies assigning vocational training to the individual GQF levels on the basis of the type of training.

At the same time, a differentiation between 2-year and 3-year/3.5-year vocational training programmes can be justified insofar as the decisive criterion is not the duration of the vocational training but rather the difference in the level of vocational competence which is a result of the difference in the length of the training. Moreover, occupations which involve a two-year training programme generally constitute the first stage of vocational training that continues on to a more advanced level.

Due to the highly complex vocational competence that is taught during 3-year and 3.5-year vocational training programmes, such programmes should be assigned to at least the same level as the *Allgemeine Hochschulreife*.

It must however be assumed that further differentiations could be made when assigning qualification levels to GQF levels in future when all qualifications are considered systematically on an outcome-oriented basis. This applies to every type of qualification, including qualifications acquired through vocational training.

4. Classification of qualifications to Levels 3 to 5 in Europe

In order to ensure the EQF's "translation function", the classifications agreed upon in other EU Member States should be taken into consideration when assigning qualifications, particularly the *Allgemeine Hochschulreife* and vocational training, to the GQF. Information regarding the assignment of qualifications to the individual levels is currently available from Denmark, France, Ireland, Luxembourg, Malta, The Netherlands, Austria, Poland, the Czech Republic and the United Kingdom. In other European countries, qualifications which are comparable to the *Allgemeine Hochschulreife* are assigned to Level 3 or Level 4 of the EQF. France constitutes a special case. It does not include any general school-leaving certificates - including general qualification for university entrance - in its qualifications framework. Its reason for not including them is that they are not technically-oriented and have no relevance for the labour market.

Assigning the *Allgemeine Hochschulreife* to Level 5 of the GQF or EQF would cause considerable confusion in other European countries. As a result, the assignment of other German qualifications would also be critically examined. Assigning the *Hochschulreife* in Germany one level higher than in virtually all other European countries would also have to be justified in the European context. This would have to be explained on a separate basis, particularly for the pending referencing process (GQF level to the EQF level).

Further, short-cycle courses of study which are common in Anglo-Saxon countries, The Netherlands and Denmark are assigned to Level 5 of the EQF. Based on the learning outcomes, such courses of study can usually be credited, from 50 to 70 per cent, toward a bachelor's degree. The German *Allgemeine Hochschulreife* does not fulfil these requirements.

Qualifications which are comparable to a normal vocational qualification earned through the German dual vocational training system are usually assigned to Level 4, particularly in countries with similar vocational training systems such as Austria and Luxembourg.

A comparison with other European countries shows that the *Allgemeine Hochschulreife* is usually assigned to Level 4 - as is vocational training.

5. Conclusion

The BIBB Board notes that transparency, permeability and equivalence can be fostered in the German education system and confidence between the different education sectors can be strengthened only when employers' associations and employee representatives, instructors and learners, and players in the education policy field - as potential users of the GQF - accept the GQF and recognize the advantages/added value it offers. This is not about depicting or defining currently existing education and vocational training structures or hierarchies. Instead, the focus must also be on establishing and strengthening vertical and horizontal permeability at national and European level.

Assigning qualifications to the individual GQF levels for institutional or political reasons would jeopardize the original GQF objectives, namely: ensure a sufficient pool of skilled labour by simplifying mobility; foster permeability between educational levels; motivate people to pursue lifelong learning; and make the equivalence of qualifications visible.

The GQF will offer benefits only when qualifications in the various education sectors are classified according to uniform principles, criteria and methods on the basis of the GQF descriptors.

The EQF and GQF will enjoy broad acceptance only when the upcoming work to be done in the GQF Working Group is continued on the basis of a consensus between the relevant representatives of the individual education sectors and the results of their work are recognized in political decisions.