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External Evaluation of the COMENIUS Project
“Netzwerk zur Entwicklung und Verbreitung eines europäischen Wirtschaftsabiturs
European Business Baccalaureate Diploma) – EuroBacDiploma
(Project nr.: 510568-LLP-1-2010-1-DE-CO;ENIUS-CMP 7, financial support agreement nr.:
2010-3789/001-001)

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Dear Sir or Madam,
dear Mr. Heyd,

attached you will find the above mentioned final report External Evaluation of the COMENIUS Project “Netzwerk zur Entwicklung und Verbreitung eines europäischen Wirtschaftsabiturs European Business Baccalaureate Diploma) – EuroBacDiploma, (Project nr.: 510568-LLP-1-2010-1-DE-CO;ENIUS-CMP 7, financial support agreement nr.: 2010-3789/001-001)

Kind regards,



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attachment

**External Evaluation of the COMENIUS Project
"Netzwerk zur Entwicklung und Verbreitung eines europäischen
Wirtschaftsabiturs
(European Business Baccalaureate Diploma) – EuroBacDiploma“**

Product Evaluation – Acknowledgement to the Purchaser

Prof. Dr. Marc Beutner / Dipl.-Volksw. Melissa Fortmann

*Chair Wirtschaftspädagogik II (Business and Human Resource Education),
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**Project number: 510568-LLP-1-2010-1-DE-COMENIUS-CMP
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1. Fundamentals

European certificates and joint efforts within the framework of the European Union have become increasingly important. The EU aims to meaningful support education in Europe with different measures and programmes in educational promotion.

The multilateral Comenius project "Netzwerk zur Entwicklung und Verbreitung eines europäischen Wirtschaftsabiturs (European Business Bacculaureate Diploma) - EuroBacDiploma" (duration from 01/10/2010 to 30/09/2013), which will be considered in greater detail below, and this final external product evaluation report are both linked to this context.

'Comenius actions' of the European Union are a part of 'Lifelong Learning Programmes'. They imply all types of school education. Even though this programme covers all types of school (from primary school to secondary school), it is important to focus on one specific type of school within the framework of a project.

The EBBD-project - EuroBacDiploma focuses on vocational schools in Europe. EBBD-project partners come from Austria (AT), Germany (DE), Denmark (DK), Finland (FI), Hungary (HU), Netherlands (NL), Rumania (RO) and Russia (RU). The projects' challenge was to deal with different educational systems in the partner countries.

Main objective of the project is the development of an EBBD-portfolio, including the EBBD-curriculum, and its implementation. This is accompanied by the definition and testing of related accreditation and certification procedures.

The underlying idea of the project "European Business Bacculaureate Diploma - EBBD" is the development of a harmonized European EBBD certificate. The target group which is going to receive this certificate acquires additional qualifications in the fields of *Economy, Europe, Languages and Mobility*.

Summing up, it is about evolving a transparent standard for European, business-related competences in a converging Europe. Moreover, it assists mobility of graduates and therefore enables those who aim at a general university entrance qualification to graduate on a European level.

Prof. Dr. Marc Beutner, the chair of 'Wirtschaftspädagogik II' (Business and Human Resource Education) at the University of Paderborn was assigned for the external product evaluation within the last six months of the EBBD project, from 15/02/2013 to 30/09/2013. In the context of product evaluation the focus is on a criteria-oriented examination of the EBBD-portfolio. The portfolio includes:

- **The EBBD-curriculum –**
This is a comprehensive and differentiated curriculum with descriptions of objectives, content and requirements of the “European Business Baccalaureate Diploma”, together with hints towards its implementation.
- **The stipulation of standards for the fulfilment of EBBD requirements –**
The comprehensive presentation of standards must be emphasised here. It creates transparency and gives a compressed overview and thus functions as a basis for implementation and accreditation.
- **The range of instruments and examples for documentation and assessment within EBBD –**
These instruments enable a structured process and include examples allowing precise documentation and assessment in the framework of EBBD.
- **Procedure and criteria for accreditation –**
This portfolio section illustrates the necessity of accreditation of educational institutions wishing to award this certificate. Furthermore, alternative procedures as well as criteria of accreditation are established.

In line with the external evaluation coordination with the Finnish project partners took place. The Finnish project partners are assigned with the internal product evaluation of EBBD. The external evaluation sees a positive development of the project and a positive evaluation of the final results. The internal product and project evaluation shares this assessment in a similar way. The external project evaluation supplements the internal evaluation consciously by adding an independent external perspective.

The external project evaluation mainly took place at two different points in time:

- a) six month before the scheduled end of the project
- b) at the end of the project itself

Looking at these two points in time made it possible to illustrate the project’s development.

It can already be said that the EBBD-project fortunately has improved and complemented the projects’ products throughout the last six months. Products were described in more details. Moreover they took suggestions and hints as well as ideas for improvement by the external product evaluation seriously and realized them in a positive way. Therefore a very positive image in regard to project results at the end of the project emerges.

2. Descriptive Approximation of the EBBD-Portfolio

The certificate on basis of the EBBD-portfolio combines the general university entrance qualification with an economic focus on the fields of *Economy*, *Europe* and *Mobility*. Hence a comparable degree in different EBBD partner countries can be achieved.

The EBBD-Portfolio consists of *two alternative structures* in which qualifications and conditions are interconnected. This is on the one hand the approach that defines a *profile* and on the other the approach that defines *learning areas*.

The first approach *profile* considers three complementary profile descriptions of future working- and living conditions. Those can be accomplished with the help of EBBD qualifications. It is pointed out which qualifications an EBBD graduate acquired and in which fields of work and fields of action these can be used. Therefore the perspective of application becomes the centre of consideration.

Alternative 1 combines the profile in the field of action concerning “qualifications“:

- Studying in Europe
- Working in Europe
- Living in Europe

combined with the „Integrated Soft Skills“ and “Technical Requirements“:

- Foreign Language Competence
- Competence to Work on Economic Issues in a Foreign Language (CLIL)
- Competence to Act in a Business Environment Abroad – Workplacement Abroad
- Problem-Solving Competence for Economic Situations – Simulations, Projects
- General University Entrance Qualification

Again with the integrated soft skills.

Within the *profile* approach the field of action “Studying in Europe” focusses on studying within the European Economic Area. The learning outcome is tied to C. “Working in Europe” focusses on business and economics. These fields of action are supplemented by “Living in Europe” which focusses on comprehensive learning outcomes.

“Studying in Europe” is directed to European study programmes, study life, cultural integration of a person’s actions in the environment for studying, business oriented study projects, research tasks in socio-economic-areas within Europe as well as lifelong learning. It is concretised in seven learning-outcome-phrases (S1-S7).

On the other hand “Working in Europe” takes form in eleven learning-outcome-phrases (W1-W11). It considers adequate working opportunities, labour market and applications, labour market needs and opportunities for development, intercultural working groups, acting in the working environment, European procurement markets, production and logistics, European acquisition of orders, internal and external forms of accounting systems, business processes on the European market as well as risk analysis taking into account the economic development in Europe and European guidelines.

Concluding, the field of action “Living in Europe” is defined by six learning-outcome-phrases (L1-L6). It puts emphasis on social life and requirements in Europe, context dependence on a person’s actions, cultural involvement and communication requirements, coping with everyday life in a foreign language, information on Europe and autonomy as a European citizen as well as understanding and handling with structures and functions of European institutions.

However, alternative 2 combines the three learning areas with regard to “qualifications”:

- Business Competence
- Competence in International Business Fields
- European Competence

This is again accompanied by the “Integrated Soft Skills”.

The same “Technical Requirements” mentioned above are also combined with the “Integrated Soft Skills”.

In the learning area “Business Competence” four learning sub-areas (A1-A4) are brought together. The learning sub-areas focus on business administration on the European single market, economics on the European and international market, business-related information processing and national business law.

Relating to the learning area “Competence in International Business Fields” four learning sub-areas (B1-B4) are defined as well. Focus is on global marketing, European community law and international business law, accounting including international aspects and international taxation policies.

The final learning area “European Competence” is described by two learning sub-areas (C1 and C2) which are European citizenship and European context as well as cross-cultural communication and collaboration.

The project also stipulated EBBD-standards which list the elements of the curriculum – profile or learning areas, technical requirements, integrated soft skills as well as the approximate time needed and documentation and assessment instruments – as well as instructions for documenting, evaluation and accreditation.

3. Criteria-Based Product-Evaluated Statements concerning the EBBD-Portfolio

In the following, the main portfolio elements are considered. Different criteria are used which have a clear justification. These justifications are pointed out in brief.

The criteria 'Competence Orientation' can be explained by the growing importance of curricular efforts in this area in Europe in the last five years. By using this 'competence orientation' the focus is on the student and his/her initialized and intended increase of competence. This involves a consideration of the learning outcome. This perspective is of main importance because of the Anglo-American region, the embedding of the EQF and national frames in European partner countries. Therefore, a curricular approach as the one in the EBBD has to face modern requirements. Focussing on competence orientation and looking at the output is closely related to the aspect of overlap avoidance resp. the degree of overlapping as this expresses to what extent the competences focused upon lead to redundancies.

The criterion "Extent and equal rights of alternatives" considers the heterogeneity of requirements in the different partner countries in Europe and particularly within the framework of the project. This criterion focusses on the important aspect whether EBBD is tailored to fit to the different framework requirements.

Furthermore, the criterion "Structure" analyses the structure of the portfolio and the attached materials plus its system. This is about verifying the conformability of the structure because external curricular and portfolio recipients need to capture this exact structure in line with their examination of EBBD and its transfer.

It is important to define terminology and therefore to make the overall comprehension easy to understand. The appropriate examination is based on the criterion "Diffuse terminology". The focus on "diffuse" occurred, because it seems almost impossible to use selective terminology. This is due to the fact that the European Union and European commission itself often does not use homogenous and selective terminology. Therefore, a certain degree of fuzziness in the framework of a project is inevitably since the EU-fundamentals do not offer a consistent use of terminology.

The criterion "Basis" takes a look at essential reference points from the EU which forms the point of beginning, background and foundation of this project.

The criterion "Transparency" with its analysis also supports the examination of conformability. It is the basis to a sustainable use and concrete reception of the portfolio.

By taking a closer look at the "Degree of Integration" as another criterion the specific characteristic of the EBBD portfolio becomes visible. An embedding of soft skills into different parts of the portfolio or rather descriptive level (learning areas and profile)

takes place. This criterion emphasises to which extent this combination is declared and comprehensible.

The description levels "Learning Areas" and "Profiles" are considered using the criteria 'competence orientation', 'extent and equality of the alternatives'.

3.1. Feedback on the Description Levels: Learning Area and Profile

Criterion 1: Implementation of Competence Orientation and Output Orientation

With focus on competence orientation it can be noted that expected learning outcomes (output) were placed in a central position. Moreover, curricula dealing with this aspect generally provide a level of differentiation. In addition, the focus on problem situations is a key issue that discerns the future practical requirement situations (outcome). 'Outcome-orientated work' emphasises the link to the real world of work and the field of action, whereas 'output' merely considers the field of the acquisition of education with regard to end products. This illustrates that the focus should be on securing the outcome that prepares the learners for the situations in the future world of work and the vocational field by curricular guidelines and development of competences based on these guidelines.

The focus of EQF on learning outcomes demonstrates that this perception is taken seriously within the EU:

„The eight reference levels are described in terms of learning outcomes. The EQF recognises that Europe's education and training systems are so diverse that a shift to learning outcomes is necessary to make comparison and cooperation between countries and institutions possible.“

(European Commission Education and Culture 2008, p. 3)

First of all it should be noted that different kinds of competence understandings underlie the EBBD portfolio. These are hard to reconcile in some parts. This is not directly due to the designers of the EBBD curriculum. In fact it can be attributed to the vague definition of terminology as it is deployed within the EU. Thus the European Commission states in its depiction of the European Qualifications Framework for life-long learning:

“... it was agreed to use the distinction between knowledge, skills and competence (KSC) as basis of the framework, because it is the most established way for categorising learning outcomes.” (European Commission: The European Qualifications Framework for Life-long Learning 2008, p. 5. Online: http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/brochexp_en.pdf)

„The EQF is also, insofar, not a competences framework, as learning outcomes can, for example, also be knowledge without any corresponding competences or skills.” (European Commission: The European Qualifications Framework for Life-long Learning 2008, p. 6. Online: http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/brochexp_en.pdf)

Whereas the *Annex of the Recommendation of the European Parliament and the Council of 18 December 2006 on key competencies for lifelong learning*, in other words the brochure ‘*Key Competencies for Lifelong Learning – A European Framework*’ defines:

„Competences are defined here as a combination of knowledge, skills and attitudes appropriate to the context.“

Thus it emphasises with almost the same terms the contextual and situational embedding.

In both areas the EU interprets the guidelines as being output-oriented, although a quite different approach is chosen. Furthermore, interdisciplinary studies and efforts, for example, ‘The Pisa study’ as well as discussions about educational standards, clearly hint at the different understandings of the term ‘competence’.

Klieme et al. state in their considerations concerning standards of education with regard to vocational action competence the following:

"Competence is understood [this refers to the vocational action competence] - unlike in this expertise [here the debate of education standards is addressed] - as an interdisciplinary action competence that covers technical competence, methodological competence, personal competence and social competence."
(Klieme et al: *Expertise. Zur Entwicklung nationaler Bildungsstandards*. 2003, p. 45)

Taking this as an initial point, it is not surprising that there is conceptual fuzziness. This cannot be attributed to the project itself as it is orientated towards guidelines of the EU, which contain this vagueness. In order to facilitate orientation for the reader, the project defines competence terms according to EQR and the reference framework for key competences according to EU-guidelines in the portfolio (p.5 and 7).

Thus, the project pursues the approach of fulfilling requirements of different forms of realization in the European countries. They did this by conducting an approach concerning *learning areas* on the one hand, and a situation-related approach regarding *profiles* on the other hand. With regard to the project, both approaches are considered being competence-oriented and put the focus on learning outcome. However, the degree of realization differs which is due to the demands and differences related to the educational systems in the EU.

On the one hand, it seems that a cognitive understanding of competence underlies the “*Learning Areas*“. This understanding seems to tie on to the ideas of "skills, abilities, knowledge", thus being only limitedly oriented towards the area of vocational education (see statement of Kliemes et al. above). This rather suggests a connection to general education.

This becomes clear with the following statement on p. 15:

“Within the cells formed by columns and lines, concrete areas of content are specified. Therefore, the tables display learning outcomes which are defined – in accordance with the EQR - as knowledge, skills and competences. Knowledge is designated by content, skills by indicators and competences by the level of independent and responsible behavior.”

This area appears only partly to focus on vocational education. Nevertheless, it is comprehensible in regard to the focus on university entrance qualifications.

This means that indeed a technical link with economic aspects takes place in „Business Competence“, "Competence in International Business Fields" and "European Competence". However, on the one hand the term ‘competence’ suggests an orientation towards future life situations in which such competences can be used. On the other hand, the alignment occurs more classical input-orientated. Here, professional contents seem to be in the focus. This is expressed explicitly in the interpretation as "Qualifications" (field name). It partly remains unclear which future requirement situations a learner of the target group should be able to cope with.

The project states on p. 17:

“Possible correlations between the learning outcomes for the learning sub-areas with the learning outcomes in the EBBD profile are explained below the tables. Here it is exemplified, in how far the learning outcomes from the learning sub-areas contribute to achieving the perspective of application described in the *profile*. Here, the learning outcomes of the *profile* are identified with the abbreviations S1-S7, W1-W11 and L1-L6.”

This indicates a reference between *learning areas* and *profiles*. However, this leads only to a limitedly clear indication of a situational context “But this is consequent considering the huge range of requirements of the different actors in various educational systems.

On the other hand, a more vocational understanding of competences is provided in the area of "Profiles". This stresses the aspect of ‘vocational action competence’. In this connection a more competence oriented way is chosen which is accompanied by an output and outcome orientation. This corresponds to the modern discussion in European Vocational Training Policy, as they are reflected e.g. in the competence-based curricula in Germany (see Ministry of Education NRW 2013:

http://www.berufsbildung.schulministerium.nrw.de/cms/upload/hbfs/FAQ_Bildungspläne.pdf). Essential is the orientation at requirement situations which constitute the curricular basis. Regarding the profiles, they can be referred to as rough descriptions of requirement situations with the focus on the areas of "Studying in Europe", "Working in Europe" and "Living in Europe".

Overall, the combination of the two variants is comprehensible. However, with the alternative of "*Learning Areas*" a less competence orientation can be discerned. Also, more of a focus seems to be on input orientation (in terms of 'what is to be taught') and the alternative of "*Profile*" opens a more modern competence-based interpretation and takes output- and outcome-orientation more seriously. Both variants do not compete but rather constitute an appropriate combination of different approaches. The fuzziness which emerges is – as already indicated – common in Europe and thus not to be held against the project. – If at all it can be attributed to the inconsistent proceedings of the EU and the commission.

It can be said that with the alternative of "*Learning Areas*" an objective is presented which is absorbed in the area "*Profile*" and interpreted with regard to further applications or rather future requirement situations. This interpretation is supported by the evaluation team as the combination of both approaches is regarded as strength of the project.

On p. 6 the portfolio states:

"Nevertheless, both approaches are very closely connected: the learning outcomes defined in the learning areas are applicable for reaching the learning outcomes described in the profile. By following the learning areas approach, the perspective of application will therefore always be considered as well. When following the perspective of application approach described in the profile, the learning outcomes from the learning areas can provide concrete criteria. In the curriculum, this connection is presented under Item 3: here it is exemplarily explained to what extent the learning outcomes from the learning areas contribute to achieving the perspective of application described in the profile."

At the first evaluation moment it was suggested to work out the application fields of the *learning areas* more clearly and also to illustrate the connection to the *profiles* in a more explicit way. Thus the question arises to what extent these two are really alternatives. It seems to be that the *learning areas* are a precursor to achieve the *profiles*. This could be elicited and discussed within the project. At the second evaluation moment by the end of the project it has been noted that a discussion took place. The project decided to make limited adjustments in order to keep up the alternative orientation on both curricular options.

The portfolio interprets the situation on p. 6 as the following:

“Both approaches were developed as alternatives to take into account the fact that traditions regarding the design and formulation of curricula within Europe are very different. It is thus common in some countries, above all in those that already have significant experience with orientation towards learning outcomes, to formulate more general targets and to leave the concrete definition of the way to reach these targets to the respective educational institutions. The *profile* approach can be sensible in these cases. In other countries, however, it has so far been more common to define firmer targets. Here, the learning area approach will be more suitable.”

3.2. Feedback on the Description Levels: Learning Areas and Profiles – Criterion 2: Extent and Equality of the Alternatives

At the first evaluation moment it was assumed that “*Learning Areas*” and “*Profiles*” are equivalent alternatives in the project EBBD. There are, however, quite noticeable discrepancies concerning the extent and the equality of the alternatives in the former portfolio.

While “*Learning Areas*” (p. 14-34 of the Portfolio) already quantitatively captured a large extent, the representations of the “*Profiles*” (page 9-13 of the Portfolio) were described more concisely.

The current version of the portfolio retains this ratio.

However, on p. 6 of the portfolio is demonstrated that:

“When following the perspective of application approach described in the profile, the learning outcomes from the learning areas can provide concrete criteria. In the curriculum, this connection is presented under Item 3:...”

For reasons of clarity, this connection is illustrated just once – with the learning areas. It increases the presentations’ volume of the profile simultaneously.

Although the volume of interpretation increases, it is not enough to emphasise the differentiation of the alternatives.

From the perspective of an external evaluator this is comprehensible in terms of focussing. But it is not necessarily a clear external presentation of the equality of alternatives which can still be assumed.

A different level of concreteness prevails and also the shorter alternative is the more innovative one. Moreover, this alternative is more compliant with the EU competence-based approach. Therefore, it would not be right to assume a minor importance, which definitely does not seem to be the case.

A further development in the sense of detailing the “*Profile*” alternative is possible, but not necessary. A concretion would improve the already high quality of the entire curriculum and could further influence in a positive way.

3.3. Feedback on the Level of Description: Profile in the Fields of Action

Criterion: Structure

According to the documents “*Profiles*” derive from the genesis of the project, the basic ideas and the original elements. These ideas could be explained more clearly and also the type of derivation could be made more transparent.

Selecting

- Studying in Europe (S1-S7)
- Working in Europe (W1-W11) and
- Living in Europe (L1-L6)

is understandable.

Changes made out through the two evaluation moments are of editorial nature. They complement particular aspects at some points (for example p. 9).

The structure is comprehensible for outsiders and applicable in the implementation. Although, other and more concrete situations could partly be more appealing for the profiling. The *profile* part of the portfolio clearly shows the innovative strength of the EBBD project. Due to the combination of *profile* and *learning area*, the curriculum has a modern, clear structure that is also adaptable to general conditions. This structure seems to be far superior to other curricula created in the context of the EU.

Criterion: Competence Orientation and Overlaps

Competence orientation is evident and understandable. The output-orientation becomes clear through an explicit focus on future fields of application. The selection of profiles is not free from overlapping, which is not surprising as there is an amount of European framework conditions and structures of education that often can be seen as interlocked. Yet, the profiles can be provided in a more concrete way. This would also lead to a reduction of overlapping, if applicable. Simultaneously, the overlapping of profiles does not need to be considered as something negative. With regard to the application in various partner countries it is rather reasonable to capture different situations in one curriculum.

At the first evaluation moment the suggestion was made to work out the fields of action more precisely. This was partly implemented. A further specification with regard to the future application situations could still be useful.

Another suggestion at the first evaluation moment was to delineate aspects such as learning in Europe (next to or as an alternative to studying in Europe - Integration of

advanced education - tertiary - education, etc.). This was not developed any further as the already existing profiles were interpreted as stable.

On p. 9 it is indicated marginally:

“Aspects such as lifelong learning and continuing education are integrated into the respective fields of action.”

This also applies to another example, i.e. cultural activities in Europe. Culture and interculturality are reflected in all three fields of action and therefore similar possibilities exist.

During the first evaluation moment it was noted that a justification of the integration of these issues into three areas would be helpful; a realization is not yet conceivable.

But on p. 9 and 10 is stated:

“The cultural aspect plays a central role before the background of the specific focus of the EBBD - mobility within the European Economic Area. As a result, cultural points of view are defined in all three fields of action.”

Since the profile intends to describe the aim or the perspective of usage of the qualifications of EBBD-learners in the sense of outcome orientation, this perspective could be differentiated more explicitly.

Criterion: Unclear Terms –

The use of competence and qualification as well as various concepts of competence in the different parts of the Portfolio

There is a more vocational-oriented concept of competence underlain.

Criterion: Basis

The basis of the profile approach could be explicated more clearly by recourse to the EQF.

So far on p. 10 is listed:

“In compliance with the *European Qualifications Framework (EQF)*, these learning outcomes describe what a learner knows, understands and is in the position to do. Knowledge, skills and competences therefore define the learning outcome in accordance with the EQF. Furthermore, the *Common Framework for Europe Competence (CFEC)* is also taken into consideration in the description of the required learning outcomes.”

An explanation how the profile can be realised within the implementation of the curriculum could be supportive for a curriculum recipient. Additional annotations to p. 10 of the portfolio would be reasonable.

3.4. Feedback on the level of description: Learning Areas

Criterion: Structure

The structure of the learning areas is continuously characterised in three fields:

“A - Business Competence

B - Competence in International Business Fields

C - European Competence“

In the portfolio the area of *soft skills* is no longer clearly assigned. It is interpreted as "Integrated Soft Skills". However, this involves the risk that they are never (neither in the field of learning areas or profiles nor in the "Conditions" - "Technical Requirements") taught explicitly. The accreditation process should ensure this to counter this risk.

In the interpretation of the portfolio, the learning areas A to C are regarded equal, while the area I soft skills is attributed an overarching role.

Technical requirements are understood as general conditions towards EBBD. Therefore, the correlation of D foreign language competence, E Competence to Work on Economic Issues in a Foreign Language – CLIL, F Competence to Act in a Business Environment Abroad - Work Placement Abroad, G Problem Solving Competence for Economic Situations - Simulations, Projects and H General University Entrance Qualification to this area is traceable.

This is quite understandable with the regard to the importance of soft skills and their applicability in different contexts. In the text there are hints and information of how an integration of soft skills could be realised. At the same time clearer indications could occasionally be useful. It would be sensible to know in which way I1 to I8 can be integrated into A to C and how a structural connection from A1 to A4, B1 to B4 and C1 and C2 can be realised. It also would be nice to know where content-based or competence-based reference points can be identified.

The approximate required time may explicitly be set out in Chapter 3 of the portfolio in order to create more transparency. The interpretation of the portfolio, that time guidelines are stated with the standards, is possible and comprehensible as the. A link to certain areas is not practical if layout, summaries etc. are not defined homogeneously. This is offered though in some other curricula as a positive implementation support.

Criterion: Competence Orientation and Overlaps

Sometimes the content- and competence-oriented design can still be defined more clearly. This is especially important since in "Learning Areas" a prior input orientation is to be assumed until now.

Thus, there are quite possibly overlap potentials between A1: Business Studies (Business Administration) in the European internal market and B1: Global Marketing. An explanation is illustrated on p. 17 of the portfolio. But this does not compensate the redundancy. Marketing strategies and marketing mix are discussed in the methodological application example in A1, which are also rediscovered in B1 in the areas of methodological application and decision. This can be seen as an example of an area where a clearer distinction might be useful. Another example is a similarity and possible overlap between A1 (costs for goods and services) and B3 (cost structures) – (see explanations on p. 17).

The *learning areas* A, B and C were formulated competence-oriented by the project partners. In this case, the partners follow the European Qualifications Framework – EQF which is welcome in a European context.

Criterion: Unclear Terms –

Use of Competence and Qualification as well as various Concepts of Competence in the different Parts of the Portfolio

It could be explained more clearly how the relation between the interpretation as competences (image p. 3) and a competence-based approach as well as qualifications (image p. 3), i.e. requirements of work life, is characterised and justified. A deeper explanation of the definition of the interpretation of terms like concepts, qualifications and competences would possibly make sense in the curriculum. However, a first conceptual determination can be found on p. 5 of the glossary. Currently this is based on a more cognitive concept. The displaying of this position might be helpful to provide transparency.

Criterion: Basis

To choose the CFEC (Common Framework for Europe Competence) as a basis for C and the Common European Language Framework - CEFR as the basis for D is also appropriate.

3.5 Feedback on the technical requirements

Criterion: Transparency

The technical requirements are difficult to understand for the recipient, because these are no technical aspects. It is useful to explain in detail why the conditions and methodological aspects of the areas D, E, F, G and H actually are technical requirements. The project briefly states on p. 7:

“The conditions are defined through five technical requirements (Item 4). These are meant as framework conditions – and not as technical equipment requirements.”

Furthermore, the portfolio states on p. 6:

“In addition to the qualifications, there are - regardless of whether the *profile* approach or the *learning areas* approach has been selected - certain conditions to be fulfilled by the students so that they achieve EBBD standards and can obtain the certificate.”

3.6 Feedback on the soft skills

Criterion: Level of Integration

The soft skills are always described as integrative. A clear classification is not given. This could lead to potential risks concerning inadequate integration of soft skills. Classifications are undertaken in tables on pages 10 to 13, indeed, but these do not follow the sense of a clear and complete classification which could improve the degree of integration.

The reason for using integrated aspects is understandable. However, it is important to give explanations regarding the realisation of integration.

The points I1 to I8 give rather target dimensions in the form of definitions. An explanation of levels of integration and opportunities does not occur.

Criterion: Transparency and Unclear Terms

In this area qualification terms and competence terms are also not cleanly separated. This corresponds to the guidelines and some missing clarities. You can find the terms ‘skills’ and ‘key competences’, ‘further competences’, ‘EBBD-qualifications’, etc.

This is detrimental to the curricular quality. Wherever a consistent language regulation is possible, it should be pursued. But this should be done without aligning all parts of the curriculum, due to the fact that these are different requirements of the countries and the different approaches within the EU.

Criterion: Extent and Quality

The statements on soft skills are very brief (pp. 45-46), and work to a large extent with enumerations. So that both, the extent and the depth of qualitative representations could be developed further. Some statements were rather common and not very illustrative at the first evaluation moment:

“Other key competences are rather general and can be assigned to different contexts and learning outcomes.” (p. 45)

This became more concrete throughout time:

“Other key competences, such as e.g. *Learning to learn* as well as *Social and civic competences* are of a more general nature and can be assigned to different contexts and learning outcomes.” (p. 45)

The named competences are taken from the EU document. There, eight key competences are listed.

3.7 Feedback on the Brochure

The brochure reflects the structure of the portfolio and the verification document. Here, a common procedure is recognisable as well as a support for the users. Essential information is collected in an adequate way.

3.8 Feedback on the EBBD-Standards

All in all it can be stated that the standards were kept quite soft at first. It seemed as if these standards would open up the possibility to obtain accreditation to almost every interested bidder for an accreditation.

At the second evaluation moment, deadlines for the accreditation and the possibility of rejecting an application were added. An explicit expansion and strengthening occurred.

From the perspective of an external evaluator it should be considered whether the aim of the EBBD project is:

- a) to connect a high-quality requirement with the curriculum and accreditation
or
- b) to promote the broadest possible use of the curriculum through a very simple accreditation.

The project has taken a decision and focuses on quality and goodness, which is a clear improvement in the last six month of the project. The procedure of accreditation could be explained in more detail.

By the choice between the alternatives "*Profile*" and "*Learning Area*" combined with the relatively open standards six month ago, which are:

- no fixed foreign languages but only level requirements B1 and B2 (see page 47)
- always references to the rather open learning areas of Chapter 3
- soft statements on the duration of the internship "basically 4 weeks or longer, 3 weeks should not be exceeded")
- etc.

the impression emerges that the standards are kept quite soft. By the end of the project the portfolio states on p. 7 that the first foreign language is conveyed on level B2 whereas the second foreign language is conveyed on level B1 of the CEFR. Within the European educational systems – depending on geographical location and tradition – different languages are offered as a first or second foreign language. Hence, there can no and should no fixing of a foreign language be made at this point. The compliance with essential standards is ensured by the definition of clear and similar levels throughout Europe.

Furthermore it is stated on p. 17:

"The overlaps that partly exist serve two purposes: One the one hand they shall allow a certain degree of flexibility for educational institutions offering EBBD. On the other hand they shall guarantee that minimum standards are met."

and added on p. 41:

"This arrangement takes into consideration that there are significant national differences within the European education systems regarding organisational, curricular and financial factors."

With this, explanations are given, because the basic issue of coordinating the requirements from different countries and institutions is definitely understandable. The project is facing great challenges and handles it well. Although, sharpening the standards would be possible.

3.9 Feedback on the Documentation and Evaluation

The templates and produced documents function as examples that can be used and further developed.

Documents to 7.0

It is about basic documents such as EQF, etc. For the conceptual sharpening a clear position of the project would be useful. However, an innovative project like EBBD which is organised on a European level cannot escape the basic problem connected to the vagueness of EU guidelines. Certainly, the project is not at fault but rather it is able to position itself adequately.

Documents to 7.2

At the first evaluation moment the Learning Agreement on a work placement for EBBD-learners was kept fairly standardised. It was not much of a negotiation about what is to be taught in individual placements, as it is often found in ECVET considerations. This is not fully set aside by the end of the project, but with illustrations on p. 53 as well as appendices such as 7.2.1, it is developed in a positive way. Two documents were created, the ECVET-test version in the current reading as well as another version which concentrates specifically on EBBD standards (s. p. 50). This is very welcome and useful.

The content requirements for work placement reports are tinged with the characterisation of the host country and operational activities as well as more classic descriptions. Also they are just limitedly oriented on requirement situations and only to a small degree innovative. At the first evaluation moment a stronger competence orientation was desirable since learners will encounter immediately requirement situations in the field of practice. This was realized in in the appendance 7.2.2, so progress was made by the end of the project.

The use of the Europass is a minimum requirement and is redeemed.

The questionnaire for the acquisition of companies can indeed be used, but the question is which company is actually acquired in this way. The projects perspective is to find out, if and for how long a work placement could generally take place in the company. Insofar the document is used as a support which rather could be understood as a suggestion that shows which aspects need to be considered.

The assessment document was not immediately self-explanatory for most involved actors at the first evaluation moment and certainly required some explanation. This improved by the end of the project through the appendance 7.2.4_5 Assessment_demo version and 7.2.4_5 Guideline_Evaluation. A clear progress and positive status is to be highlighted.

Documents to 7.3

At the first evaluation moment the documentation of the simulation phases was of a more formal nature, and could be supplemented by open reflective materials. This is

also already realized. In terms of documentation and reflexion 2 documents were produced which are both used (s. p. 50 and 54) and a demo version to 7.3.1. Another positive development can be stated here.

First, the discussion paper was largely inspired by the assessment document and again, not necessarily self-explanatory. By the end of the project this was positively developed further through the demo version 7.3.3 and therefore became more concrete. The use of self-reflection is now a lot easier.

At the first evaluation moment the presentation document was rather vague and due to the exemplarity of the four designated points of limited use. But there were already first hints made about which direction one has to think. Now, by the end of the project, a clear example is available. A further increase would be possible and useful.

4. Feedback on the Accreditation

It would be useful to determine the qualifications of a person who carries out the accreditation. Currently the accreditation is conducted by the project partners, since the project is in the pilot phase. However, in order to achieve sustainability it is also useful to fix regulations and requirements for the post-project procedure and to propose permanent institutional localisations. This was carried out by detailing the steps and criteria of accreditation. Furthermore, the society EBBD e.V. from 01.10.2013 realizes an institutional location. This can be interpreted as extremely positive, provided that independence continues; which is to be.

Within the framework of the project, the accreditation process takes place along two alternative process routes:

A Based on a Learning Outcome Orientation

Here it should be explained, on the basis of the school's profile and detailed implementation information, how the objectives of the EBBD-profile, presented in the curriculum, are materialised and how the associated competencies are achieved.

B Based on a Competence Orientation

It is to demonstrate how the learning areas listed in the curriculum are covered.

The procedure is adapted via a form set to the respective burden of proof, which seems to be a viable option. Moreover, it is to be welcomed that this way treads both paths of the project and provides the basis for the accreditation.

This shows once again that different degrees of competency-based approaches are implemented.

The process of accreditation of the curriculum is supplemented by a schematic illustration with regard to the procedure (p. 57). In comparison to the first evaluation moment this became more concrete and developed positively. Six months ago the accreditation primarily operated without a clear identification of criteria and requirements. This changed in a positive and sustainable way. On p. 58 the accreditation is elaborated more clearly.

Specific explanations of accreditation phases and evaluation basics would be appropriate. This would facilitate the overview and enable faster orientation.

There are already proposals in what way, with which documents and in what detail degree the verification should take place.

But this is mainly conducted with the elements of description such as S1 to S7 and W1 to W11, etc. regarding the profiles and the learning area descriptions in the learning areas. There could be clearer evidence of how the person responsible for the accreditation should give an intersubjective verifiable evaluation, without the accusations of subjectivity being made. Here, it would be useful to provide the accreditors with help on the accreditation.

In particular concerning the profiles it can be noticed that further concretisation is possible.

This raises the question again of whether quantity should be headed for by the project, in the sense of broadest and simple accreditation or whether it is about the assurance of quality.

Currently the impression remains here that due to the possibility of choice and the huge and subjective scope for decision making it is possible for almost all applicants to be accredited if the applicant meets the requirements roughly. Whether this ensures the quality of accreditation is to be put forward for discussion.

Moreover, it remains that the aspects of sustainable cooperation and exchange during the accreditation phase of both, content and time, should be specified in more detail.

A clear identification of the accreditation criteria and their weighting can make the process more comparable. A specification is clearly desirable for quality assurance purposes.

In summary it should be stated that the basic structure of the accreditation is appropriate and convincing, but certainly, areas of concretisation do exist. A development throughout the last six months is clearly recognisable and should be assessed as positive. The EBBD project has met the challenge of the accreditation which institutions on the EU level cannot cope with in many cases. Thus, the project's approach is welcome but also ambitious.

5. Feedback on the intended EC-VET application

The procedure in the framework of EC-VET application is not yet completely transparent. On p. 3 it is stated:

“On the basis of our experiences with FINECVET we developed a prototype for the allocation of ECVET-points. Since the practical application of ECVET in the countries of the project partners is not as advanced as we assumed at the start of the project, a detailed elaboration has been postponed.”

6. Summarising aspects at the current time

The portfolio including curriculum is quite understandable and justified, even if clear time-associated benchmarks and methodological and didactical instructions would definitely donate a further benefit.

The establishment of the alternatives "*Profile*" and "*Learning Area*" is certainly not unimportant. The reasoning for the relationship is reported (e.g. p. 59), but could be made clearer. The immediate connection to the accreditation is unmistakable, not least through concretisation of accreditation.

In any case concretisations in the areas of future application scenarios for the learning areas and in the profiles would be useful.

The curriculum can be seen as stable and it indicates a high degree of commitment of the project partners. It can be said that even beyond the project a notable development of the curricular keynote took place and that the curricular idea evaluated very positively. The modern curricular approach of combining alternatives can also be estimated positively.

The question has to be raised whether a degree of competence orientation in the learning areas is rather suggested by the choice of terminology (there is always the talk of competences). It would be helpful if several parts of the documents were more concrete to even further refute this false impression.

The reasoning could be expanded. The method is comprehensible but can be made more transparent. The learning areas and competences are recognised and clearly structured, even though – as indicated – could be justified stronger and, in terms of their relationships, could be considered in more detail. The systematisation is conceivable as well. A detailed specification could exemplary clarify key issues. The EBBD overall portfolio is stable and consistent in comparison to various other curricula developed at European level. But, the structure of competence formulations could be explained in more detail.

The certification process improved clearly and is stable, but could be explained more. The certificate itself exists and is to be assessed as very positive. In terms of credibility and transparency it could be discussed further.

Overall, an explicit and positive improvement of the products is made by the end of the project.

The project achieves a good result.

In different parts the products could be more concretised and justified but certainly it is on a level with different European curricular structures. Moreover, it is underpinned by an intense justification background which cannot be found in some other curricula. Thus, the EBBD products stand out rather due to their strengths than due to the need of concretisation stated here. All in all it can be evaluated positively.

The implementation of EBBD is absolutely to be recommended due to underlying products.

The project team had to face broad challenges over the time of the project. It shows results and products that ran through a very positive process of product development.