

January 2023

HANDBOOK

The National Register of Professional
Qualifications (RNCP)

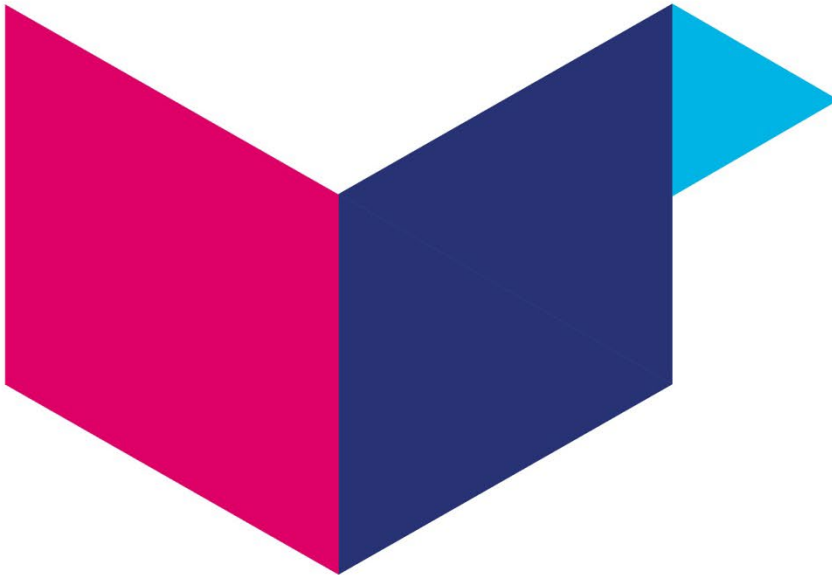


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List of changes

- V1.1 dated 24 January 2023

Change to 1.3.2.1: clarification on the examination procedure by the Committee

Change to 2.2.3.2: additional information on specific prerequisites for competencies blocks

Change to 2.3.2: correction to mandatory wording on the professional qualification certificates

Change to 2.5.2: incorporation of the items arising from the law of 21 December 2022 relating to VAE (Validation of Prior Learning)

Change to 3.5: information relating to the implementation of the equivalence identification project

Change to 3.7: information relating to the award deadline in the legal section of the description sheet

Only points 2.2.3.2, 2.3.2, 2.5.2 and 3.5 contain a change to the legal framework that applies only in the future.

INTRODUCTORY REMARKS

The law of 5 September 2018, on the freedom to choose one's professional future, called for a wide-ranging reform of the professional qualifications system in order to enable working people to pursue a practical and competencies-based approach to training, to ensure they have access training courses that address the social and economic needs of their local communities, and to make the system clearer and more transparent for companies.

By setting out learning objectives, professional certification provides a framework for training programmes (both initial and continuous), aligns them with present or future specific needs of businesses and enables the workforce to acquire competencies that can be used in their careers. It is based on the prospective studies carried out by observatories, in particular those of the various industrial sectors, the strategic workforce planning conducted by companies, as well as the direct analysis of real jobs within companies.

The aim of certification, as an evaluation process, is to provide a clear indicator of qualifications for the labour market, thus improving the match between the supply of and demand for competencies. The quality of the resulting assessment depends on procedural guarantees.

To take into account changes in emerging professions and competencies, the 2018 law provides for a review of all qualifications at least every 5 years. This is to ensure that the training courses on offer meet the needs of the labour market – i.e. that they equip workers with the appropriate competencies and enable companies to find new recruits to meet emerging needs.

France compétences is responsible for maintaining two national registers:

- the National Register of Professional Qualifications (RNCP), which contains professional qualifications pertaining one or more professions; the related training courses are mainly work-study programmes, continuing education and initial training programmes involving students in second- or third-level education;
- the Specific Register comprising specialist or vocational qualifications or those relating to competencies that are transversal (e.g. languages) or complementary to one or more professions.

Only a certification registered in the RNCP entitles the holder to a State recognised qualification (with the sole long-standing exception of general and technological baccalaureates), which in turn is recognised under the European Qualifications Framework.

Thus, the regulation of vocational qualifications, by means of these two national registers, is an essential tool for managing the professional training ecosystem.

The RNCP is made up in equal parts of qualifications awarded by ministries and by private bodies, including the various industrial sectors. 80% of qualifications in the Specific Register are issued by private bodies.

In the case of a certification awarded by a professional body or sector,¹ France compétences, and its certification committee, almost half of which is made up of representatives from the national cross-sectoral social partners, assess the application for inclusion in the register according to the following criteria:

- the degree to which qualifications match the competencies needs in the target professions (assessed for the RNCP by examining the employability of holders of the qualifications);
- the quality of the standards and the quality of the evaluation process;
- and, for the RNCP, the breakdown into competencies blocks and the use of VAE (Validation of Prior Learning).

¹ Or by a ministry, if its registration process does not comply with the procedures set out in article L.6113-5, section I
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This new regulatory system, which is geared towards addressing the challenges of the labour market and which involves the active participation of the social partners, is backed up by a set of documents (policies and guidelines), which specify expectations and enable regulatory objectives to be shared with the applicant organisations.

However, as far as the RNCP is concerned, these various individual documents have never before been compiled in a single publication, and some of them have now been updated based on three years of decisions by the certification commission, which has made more than 2,500 rulings on the subject.

While some parts of this guide focus on procedural aspects related to the so-called "on request" registration process and on how compliance with the registration criteria may be demonstrated, the RNCP is a general framework designed to provide a set of consistent overall quality standards, applicable to all the professional qualifications which it contains.

Lastly, lawmakers have given France compétences, and more specifically its Professional Qualifications Committee, responsibility for reviewing applications for inclusion in the register based on the criteria specified by the regulatory authorities. While certain provisions are strictly interpreted, the majority of these provisions are general principles whose interpretation is the sole responsibility of the Professional Qualifications Committee, in compliance with the law-makers'² intentions and under the supervision of an administrative court, which ensures that there are no obvious errors of interpretation.

Against this background, the present document, while it is designed to guide bodies applying to have their professional qualification registered and contains certain pointers relating to good practice, is above all a document that sets out the Committee's legally binding directives. Finally, these directives adopted following a meeting of the Professional Qualifications Committee on 30 June 2022 supersede all previously published policy documents relating to the RNCP, while remaining true to their spirit.

² See parliamentary debates and the impact study concerning the law
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1. THE MAIN FEATURES OF THE NATIONAL REGISTRY OF PROFESSIONAL QUALIFICATIONS

The purpose of the National Register of Professional Qualifications (RNCP) is to provide those in the workforce, as well as companies and training and guidance providers, with constantly updated information about professional qualifications. It is both a State tool for recognising these qualifications through a process that actively involves the various social partners, and a means of providing legal information concerning these qualifications.

1.1 The concept of professional qualification

The term “qualification” can have several meanings. In the present case, **professional qualification** refers to the process by which a certifying body attests, **at the end of an evaluation process**, that a person has acquired, through initial or continuous education, or through professional experience, or through personal initiative, **a set of competencies necessary for the pursuit of a profession** and that he or she will be able to carry out the associated professional duties, with a clearly specified level of responsibility and independence.

Another way of approaching professional qualification is not to define it in terms of its purpose or its goal, but in terms of its main components: the job standards framework, which sets out the professional duties involved in the relevant occupation(s); the competencies framework, comprising a system of competencies blocks which lists the professional competencies required to carry out these duties; and the evaluation framework, which identifies the methods and criteria for assessing these competencies. In addition to these elements, there are also features associated with being registered in the RNCP: title, level of qualification and prerequisites.

Though commonly used interchangeably with the term "diploma", "professional qualification" encompasses a wider range of qualifications:

- diplomas issued only by or on behalf of the State,
- vocational qualifications;
- as well as certificates of professional qualification issued only by one or several professional sectors.

Each of these three kinds of professional qualification enjoys the same status within the national framework of qualifications (cf. 1.2).

Under the provisions of the French Labour Code, the qualifications registered in the Specific Register are referred to as "qualifications" (in most cases) or as "accreditations" if they are required by the public authorities to allow a person to carry out an activity or a professional procedure in accordance with a legal or regulatory provision.

Thus, professional certification, understood as the process of checking that a person has acquired the professional competencies set out in a standards framework, also constitutes a crucial social yardstick from a professional perspective, in the case of:

1. members (or future) members of the workforce, as certification provides a measure of security for them in terms of:
 - securing their professional career, by providing a tangible proof of their qualifications and competencies;
 - employability, the competencies acquired being in line with the needs of the labour market;
 - recognition of their professional skills;
 - the potential for professional mobility and development;
 - funding, as certification is essential for access to certain types of funding (CPF, CPFT, etc.).
2. employers, as it provides a reliable benchmark when it comes to recruitment, mobility and internal promotions and also helps that the competencies needs of the labour market are met;
3. training organisations, in terms of:
 - adapting their training content to the competencies targeted;
 - the clarity and suitability of their offering to the needs of users and funders;

4. the whole community: a stable and reliable system of certification is a tool allowing the recognition of previously acquired skills and a means of guaranteeing that the systems designed to develop competencies are consistent with socio-economic needs.

In order to take account of the changing nature of professions and employers' competencies needs, each certification is valid for a period of up to 5 years, as determined by the Director General of France compétences, or by a registration procedure conducted by a ministry.³ **After the expiration date, qualifications lose their validity and are no longer registered in the RNCP, but they remain legally valid for the holders of such qualifications.** Qualifications can still be viewed on the France compétences website, so that holders can make use of their qualifications as and when required.

³ based on a mandatory consultation process with social partners and a ministerial order
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1.2 The French national certification framework and the European qualifications framework

Since 1 January 2019, the French national qualifications framework has replaced the so-called "1969" framework as the one which France compétences and certifying ministries are now required to use to determine the competencies level of professional qualifications listed in the National Register of Professional Qualifications (RNCP).

Thus, unlike the previous 5-level classification used in 1969 (levels V to I), which was closely aligned with the educational programmes run by the ministries in charge of education in schools and third-level institutions, the French national qualifications framework, following the model of the European framework, sets out 8 levels of qualification (levels 1 to 8) and distinguishes levels of expertise and skill that enable people to carry out professional duties with varying degrees of responsibility and independence.

Introduced by the law of 5 September 2018 on the freedom to choose one's professional future and referred to in the third paragraph of Article L. 6113--1 of the Labour Code, this new national qualifications framework supersedes the previous one and is recognised as being in compliance with the principles of the European Council recommendation on the European Qualifications Framework for education and lifelong learning (EQF).

By providing a breakdown of levels of qualification based on the principles and objectives set out in the recommendations, specifically with a view to "improving the transparency, comparability and transferability of qualifications", the national qualifications framework is consistent with the EQF and thus helps to facilitate comparisons with qualifications from other European countries, as well as those originating from outside the European Union, as the EQF is recognised and used by countries that welcome EU students or workers.

To enhance this comparability, lawmakers also decided to strengthen the quality assurance process. The inclusion of a qualification in the National Register of Professional Qualifications (RNCP), a prerequisite for it being legally recognised as a professional qualification as defined in Article L. 6113--1, is primarily intended to address the employability and social promotion objectives of professional education and training systems and to facilitate access to lifelong professional training.

Thus, by dint of the fact that it includes all contributors to the qualifications system in a single national register, the RNCP is the single most important resource for all the parties involved in the employment-training relationship, both nationally and internationally, and for both the public and private sector.

1.3 The various procedures for registering professional qualifications in the RNCP

Article L. 6113--5 of the French Labour Code distinguishes two different procedures for registering a qualification in the RNCP (French National Register of Professional Qualifications): registration on request and so-called registration "by law".

Qualifications are broken down as follows (by registration procedure and by position within the list of qualification levels):

As of 1 January 2023 Active qualifications	Registration by law	Registration on request	Total
Level 8	22	0	22
Level 7	1,081	529	1,610
Level 6	511	457	968
Level 5	529	349	878
Level 4	417	263	680
Level 3	365	204	569
Level 2	0	0	0
Uncategorised – registered Certificates of Professional Qualification (CQP) not yet up for renewal		135	135
Total	2,925	1,937	4,862

This breakdown shows the weighting of qualifications registered using the so-called "by law" procedure. However, this weighting varies greatly depending on the level of qualification and needs to be nuanced by a more in-depth analysis of the qualifications concerned. For example, level 7 includes 594 engineering qualifications. Setting this specific case aside, there are basically the same number of so-called "on request" professional qualifications as there are "by law" ones at levels 6 and 7.

1.3.1 "by law" entries: professional qualifications issued by the State

Article L. 6113--5 of the Labour Code states that the following are to be registered in the National Register of Professional Qualifications (RNCP) by France compétences for a maximum of five years:

- vocational diplomas and qualifications issued on behalf of the State, created by decree and established by order of the competent ministers, after consultation with the competent ministerial professional advisory commissions (Article L. 6113--3 of the Labour Code)
- and diplomas and qualifications for professional purposes issued on behalf of the State as provided for in Articles L. 613--1, L.641-4 and L. 641--5 of the Education Code, after the specific consultation provided for in Article L. 6113--3 of the Labour Code.

Each certifying ministry is responsible for creating, revising or removing its own vocational diplomas and qualifications in accordance with its remit, public service missions, the applicable legal and regulatory framework, and in order to meet the training and certification needs associated with its ministerial scope.

Each creation, modification or removal of a professional qualification within the RNCP must be approved⁴ in advance by the appropriate Professional Advisory Commission. These Commissions made up of:

- one representative from each national trade union organisation that represents employees from different sectors,

⁴ No such special approval is required when the decision concerns a professional diploma or qualification required for the pursuit of a profession under the terms of an international standard or a legislative or regulatory provision

- one representative from each national employers' organisation representing members from different sectors,
- two representatives appointed either by national employers' organisations representing members from different sectors, or from one or more professional sectors, or by public service employers involved in the professional field(s) covered by the professional advisory committee concerned,
- six members representing the State, appointed by the ministers concerned,
- five associate members with no voting rights, representing organisations involved in the professional fields to which the qualifications or diplomas concerned pertain, or with expertise in the relevant field of training and employment, appointed by the minister or ministers under whose authority the commission has been established,
- a non-voting member appointed by the French National Advisory Council of Disabled Persons.

In the case of diplomas awarded by or on behalf of the Ministry of Higher Education, a specific consultation process is set up with national cross-sectoral trade unions and with national cross-sectoral employers' organisations (or employers' organisations from different sectors) with regard to all creations, revisions or removals of professional diplomas and qualifications. This consultation process⁵ is carried out via various entities:

- the Supervisory Committee for Bachelor, Master's and Doctoral Degrees (CSLMD),
- the Committee for Engineering Degrees (CTI),
- the University Institutes of Technology National Consultative Committee (CCN IUT),
- the Evaluation Committee for Management Training and Diplomas (CEFDG).

The professional diplomas and qualifications affected by this process of registration by law can be from any of the certifying ministries (Ministry of National Education, Ministry of Labour, Ministry of Higher Education and Research, Ministry of Health and Solidarity, Ministry of Culture, Ministry of Agriculture, Ministry of the Armed Forces, etc.) as long as the conditions specified above are met. Thus, the following types of qualifications, for example, are all included:

- national degrees awarded by the Ministry of Higher Education (bachelor's degree, professional bachelor's degree, master's degree, doctorate),
- diplomas awarded by the Ministry of National Education (advanced vocational training certificate (CAP), professional baccalaureate, professional certificate (brevet professionnel),
- professional qualifications awarded by the Ministry of Labour,
- diplomas awarded in particular by the ministries responsible for agriculture, social cohesion, health, sports, culture, defence and maritime affairs,
- diplomas approved by the Ministry of Higher Education,
- engineering degrees,
- diplomas awarded by the Ministry of Higher Education conferring a university qualification.

As part of this process of "by law" registration of professional qualifications awarded on behalf of the State, France compétences is responsible for ensuring:

- that the consultation procedure is respected in the case of professional qualifications included in the RNCP and that there is a legal basis for the creation or revision of these qualifications (generally a decree or ruling published in the Official Journal (JORF) or the Official Newsletter (BO) of the ministry concerned);
- that, based on its purpose and scope, a given certification belongs in the RNCP and not in the Specific Register (and vice versa);
- that the job standards framework, the competencies framework and the evaluation framework have been included;
- that the competencies blocks have been included (except in the case of professions to which access is regulated): "homogeneous and consistent sets of competencies that enable individuals to independently carry out professional duties and that can be assessed and validated";
- consistency of the level of qualification awarded with the job standards and competencies frameworks;

⁵ Decree No. 2019-434 of 10 May 2019 relating to consultation with social partners with a view to the registration in the National Register of Professional Qualifications of third-level degrees awarded on behalf of the State.

- as part of its responsibility for maintaining national registers, that the description sheet provides users with adequate information about the qualification concerned.

These checks make it clear that, although the registration of qualifications is an ad hoc procedure in which France compétences does not evaluate the appropriateness of the creation or revision of a qualification, this registration is not a formality and entails that the certifying ministry takes into account the requirements related to the registration process.

1.3.2 So-called registration “on request”

1.3.2.1 Procedures for registration “on request”

Registration “on request” applies to professional diplomas and qualifications not eligible for registration “by law”, as well as to Certificates of Professional Qualification (CQP).

Applications are reviewed by a professional qualifications committee comprising a chairman, appointed by order of the Minister for Vocational Training, and 18 full members and their alternates, appointed as follows:

- • 8 permanent representatives of the State, appointed respectively by the Minister for Vocational Training, the Minister for Education, the Minister for Higher Education, the Minister for Health, the Minister for Sport, the Minister for Agriculture, the Minister for Social Affairs and the Minister for Culture;
- • 2 permanent representatives from regional councils or overseas deliberative assemblies with responsibilities for vocational training, appointed by the Minister for Vocational training, as nominated by the Association of French Regions;
- • 5 permanent representatives from national cross-sectoral trade unions (CFDT, CFE-CGC, CFTC, CGT, CGT- FO), with one nominated by each organisation;
- • 3 permanent representatives from national cross-sectoral employers’ organisations (CPME, MEDEF, U2P), with one nominated by each organisation;
- 1 non-voting member, representing the National Advisory Council of Disabled Persons.



This committee advises the Director General of France compétences concerning the inclusion of qualifications in the RNCP, based on assessments carried out by France compétences' Professional Qualifications Department (it may submit a change of level or title and it sets the time limit for a qualification’s validity, which may not exceed

five years). This advisory role has one principal task: to decide whether or not to include a given qualification in the register. It also involves an additional task in the event of a positive ruling: the period during which the qualification will be included in the register, the name of the qualification, a categorisation based on NSF terminology, and, in the case of qualifications included in the RNCP, the specification of a qualification level.

The committee's decision is sent to the Director General of France compétences, who is bound, in normal circumstances,⁶ to comply with the committee's decision in all its aspects (the so-called "approval" procedure).

An application to register a professional qualification in the RNCP is appraised on the basis of nine criteria set out in Article R. 6113--9 of the Labour Code, with the term "criterion" being used to refer to a series of guidelines that can be used to help with decision-making:

1. the extent to which the jobs held by holders of the qualification correspond to the profession that is the focus of the professional qualification, based on an assessment of at least two graduating classes of trainees;
2. the impact of the professional qualification in terms of access to or return to employment, based on an assessment of at least two graduating classes of trainees and compared to the impact of professional qualifications focused on related or similar professions;
3. the quality of the job standards framework, the competencies framework and the evaluation framework, as well as their overall consistency, as well as their overall consistency and the absence of exact duplication of all or part of the content of an existing listed qualification. In assessing the quality of the competencies framework, account shall be taken,⁷ as appropriate, of issues related to disability, accessibility and universal design as defined by Article 2 of the Convention on the Rights of Persons with Disabilities of 30 March 2007;
4. the implementation of procedures to monitor all the methods used to conduct evaluations;
5. consideration of the legal and regulatory requirements linked to the pursuit of the profession targeted by the professional qualification;
6. the option of obtaining the professional qualification through validation of prior experience;
7. the overall coherence of the competencies blocks that go to make up the professional qualification, as well as of their specific assessment procedures;
8. where applicable, the coherence of the following:
 - the complete equivalence between parts of the proposed professional qualification and equivalent professional qualifications at the same level;
 - partial connections between one or more competencies blocks contained in the proposed qualification and the competencies blocks found in other professional qualifications;
 - connections between one or more competencies blocks in the proposed qualification and qualifications or authorisations registered in the Specific Register;
9. where applicable, the procedures whereby the national joint employment committees (CPNE) in the various professional sectors are involved in drawing up or validating qualification frameworks.

It should be noted that the evaluation criteria provided for in items 1 and 2 above do not apply to first-time applications for registration in the case of proposed professional qualifications for which registration in the national register of professional qualifications is required to enable individuals to pursue a professional activity on French soil in accordance with an international standard or a legislative or regulatory provision. The same applies to qualifications related to professions identified by the Professional Qualifications Committee as emerging or undergoing significant transformation.

Before it can be examined, an application must first be deemed compliant, i.e. it must:

- include the obligatory documents that enable the application to be processed, in particular an analysis of the career progression of two graduating cohorts of holders of the qualification in question;

⁶⁶ In normal circumstances, France compétences is bound to apply the decision taken by the committee. The only situation in which the Director General of France compétences may not comply with the opinion is if the opinion is tainted by a legal irregularity such that its legality may be called into question

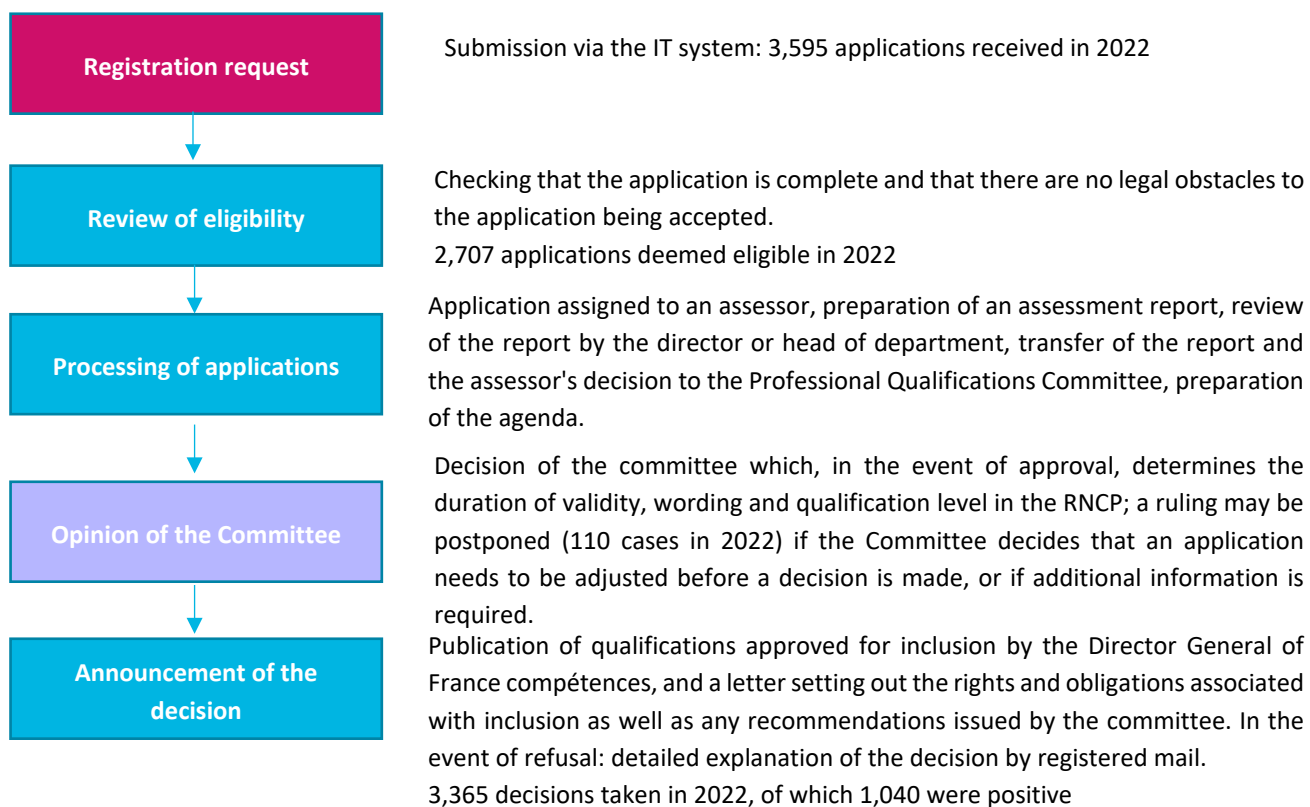
⁷ Since 1 September 2021

- be free of legal problems – e.g. infringement of third-party intellectual property rights (plagiarism); references to holders of a different qualification, or a qualification eligible for registration “by law”; an application that is unrelated to a professional qualification, that is illegal or one that is clearly covered by a different register;
- meet – (i.e. (the body or the individual making the application must meet) the integrity standards set out by Article R. 6113--14 of the French Labour Code, or must qualify or be authorised by virtue of a special standard such as, for example, the approval of the Ministry of the Interior in the case of activities regulated by Article I of Book VI of the French Domestic Security Code.

Even if the application is deemed eligible, all of these items may be reviewed as part of the process of examining the merits of the case. Eligibility may also be revoked at any time in the event that falsified data has been submitted.

The information that must be included in the certification application is intended to provide the assessor, from the outset, with all the information needed to enable the Professional Qualifications Committee to make an informed decision. Once the application has been submitted, it is examined by the assessor who, if he/she deems it necessary, may request additional information to help him/her arrive at a decision.-This is an option available to the assessor and not a requirement. The assessor is thus free to ask the organisation to submit any documents missing from their application, but is under no obligation to request that they provide further clarification or make improvements to the documents submitted if the documents are not satisfactory in terms of the criteria being considered by France compétences. Consequently, the procedure is non-adversarial in nature.

Overview (combined information: RNCP + Specific Register)



The Committee meets monthly with an agenda drawn up by its chairperson and, in accordance with its rules of procedure, it “issues opinions in accordance with the regulations in force based on a prior assessment carried out

by the designated officials [...] With regard to applications for registration in the national registers, the agenda may differentiate between applications submitted to the Committee by the chairperson:

- *those not requiring prior discussion;*
- *those requiring prior discussion.*”

With regard to this distinction between cases deemed to require or not to require discussion, it is worth pointing out that:

- this decision-making process set up under the rules of procedure stems from the need to strike the right balance between the need to examine each application individually and the requirement that a large number of applications be dealt with appropriately in a short space of time;
- Members shall be informed of the status of each case at least eight calendar days before the meeting;
- this distinction within the agenda is not unalterable; members have the right to speak on a matter without having to justify themselves, and may thus request that a discussion be held, which may lead to a decision that is different from the recommendation made by the person responsible for processing the case;
- the same information is made available to the members of the Committee, regardless of whether a file is deemed to require discussion or not;
- the fact that an application has been deemed to require "no discussion" does not mean that it has not been reviewed by the Committee: the members receive all documents prior to the meeting and review them; the fact that this review does not take place during the meeting and the fact that applications are grouped together for voting purposes does not detract from the individual nature of the review conducted by the Committee members with regard to each application.

In practice, this right to request a discussion is frequently exercised by the members of the Committee, especially since the exercising of this right is completely unrestricted and free from any form of control by France compétences personnel.

Special note: National competencies frameworks in French Polynesia and New Caledonia

The French overseas territories of New Caledonia and French Polynesia both have legal powers in the area of professional qualifications. These two territories thus have their own framework of professional qualifications.

In order for to have their qualifications included in the New Caledonian and Polynesian registers, certifying bodies are required to apply to the competent institutions in these two territories. Based on the legal document attesting to their approval by the New Caledonian or Polynesian governments, the RNCP entry may record that a professional qualification is registered in these two registers.

Moreover, the New Caledonian and French Polynesian governments may request that a professional diploma or qualification awarded by them be included in the RNCP. In order to do this, the New Caledonian and Polynesian governments must:

- apply to the relevant ministries to have their diplomas or professional qualifications recognised, with this recognition being enshrined in a ministerial order;
- on the basis of this order, they must apply for inclusion in the RNCP by means of an ad hoc process.

The inclusion in the RNCP of these professional diplomas or qualifications will produce the same rights and effects for the holders of the qualification as for all other professional qualifications listed in the RNCP, in particular the awarding of a state-recognised level of qualification. This level of qualification within the national framework will lead to the de facto recognition of the corresponding level of qualification under the European Qualifications Framework.

1.3.2.2 The specific features of Certificates of Professional Qualification (CQP)

A Certificate of Professional Qualification (CQP) is a qualification awarded by a professional sector. It attests to the holder's attainment of competencies pertaining to a specific profession within an industry. A CQP is thus a form of qualification recognised by the economic participants in a particular sector. A CQP can exist legally whether or not it has been registered in the RNCP, or in the Specific Register. However, the holders of a CQP can only be awarded a level of qualification if the certificate in question is registered in the RNCP; it is thus up to the National Joint Committee in the sector (CPNE) to decide whether or not to submit a formal application for registration.

The CNPE in each sector is responsible for its professional qualifications policies. This committee is composed of trade union organisations and employer federations. Based on its extensive knowledge of the professional challenges and trends in its sector, the CPNE develops or reforms CQPs by identifying or updating current and future competencies requirements. The analysis carried out by the CPNE regarding the profession concerned by a CQP and its associated competencies requirements is included in a feasibility study and incorporated into the job standards, competencies and evaluation frameworks.

The CPNE deliberates on whether or not to submit an application for registration in the RNCP (including the level of qualification being requested), and officially designates, in accordance with the provisions of the Labour Code, a legally recognised organisation – competency operator (OPCO), sectoral certification body, employers' federation, etc. –, thereby conferring on it responsibility for the intellectual content of the CQP(s).

In accordance with the provisions of the Labour Code, this official appointment may be challenged at any time.⁸ Similarly, CPNEs retain the right to amend, or discontinue, their CQP qualification frameworks.

A variety of actors may be involved in the process of training candidates and certifying their competencies, including training bodies, an assessment commission or committee (depending on the sector) and a certification panel made up of all or some of the members of the CPNE. As the industry's certification policy coordinating body, the CPNE must ensure that CQP(s) are administered in a consistent manner by the organisation that has been appointed to do so.

CQPs may also be awarded on an inter-sectoral basis (CQPI) and be administered by a number of different professional sectors, either upon its initial registration in the RNCP as a CQPI, or when one or more professional branches are added as co-certifiers during the registration period of a CQP.

CQPIs are designed for occupations that exist in the companies active in the sectors in question and thus constitute a form of qualification that is recognised by these economic actors. As in the case of CQPs, CQPIs are awarded by the CPNEs of each sector, which are required to identify the participating stakeholders.

The CPNEs in charge of awarding a CQPI are required to agree on a common description and definition of the job requirements and competencies to be included in the relevant frameworks. Concerning assessment: the sectors must define, in the relevant framework, the types of methods suited to assessing the competencies involved, but may, as far as their application is concerned, adjust them to reflect as closely as possible the professional circumstances prevailing in each sector. The criteria, for their part, are common to all the branches, thereby ensuring that competencies are assessed in a consistent manner and that the CQPI is of equivalent value in each sector where it is awarded.

⁸ L.6113-4: "Likewise, they may, at any time, appoint a new legal entity to replace the previous body that held ownership rights to the content of a certificate."

2. THE PROCEDURE FOR REGISTERING A PROFESSIONAL QUALIFICATION

2.1 The scope of a professional qualification

2.1.1 Identifying a competencies need in the labour market

2.1.1.1 Analysis of the appropriateness of the professional qualification.

A professional qualification initially takes the form of a reference document which establishes the link between a professional profile as described in a job standards framework and the competencies needed to carry it out the occupation in question.

As a result, the registration process includes a preliminary needs analysis phase, which involves:

- checking the professional focus of the qualification, in order to ensure that a need in labour market has been properly identified,
- a preliminary analysis of the degree and the nature of the impact on employability resulting from the qualification in order to measure its effect on the career progress of those who hold it (and to thus determine its added value),
- the development of a qualifications planning approach (based on competencies).

This initial stage is essential for the success of the registration process because it is designed to ensure that the proposed professional qualification is:

- a response to an existing and future competencies need as identified by professional actors in each sector;
- based on a competencies development approach (and not on a training or educational course design approach);
- the result of a qualifications planning approach which is driven by a socio-economic analysis, both practical and forward-looking, of the needs of the labour market, resulting in a systematic analysis of the professional activity in question and a detailed description of one or more specific related jobs;
- embodied in a set of frameworks describing all the competencies required for the performance of the job duties identified and which may, at a later stage, be combined with assessment procedures which make it possible to measure or evaluate the extent to which the previously defined competencies have been acquired, by means of suitable criteria.

Thus, a feasibility review may be used to clarify the project in terms of identifying the objectives and purpose of the professional qualification in question. The aim is to describe the current situation (in terms of needs), the probable trend in the future and, finally, the hoped for outcomes to be achieved by the creation of the qualification.

In other words, deciding on the appropriateness of a professional qualification in a given context involves:

- in the first instance, measuring the gap between the current situation and the expected outcomes;
- then verifying that creating this qualification will reduce or close this gap.

At this stage, two important steps must be performed simultaneously: identifying the existing professional qualifications in the same professional area, and summarising the available data on the qualifications targeted by these certificates.

This approach has a number of objectives:

- first of all, to provide a clearer picture of the existing range of professional qualifications which target the same duties, regardless of whether the application meets the registration criteria;
- secondly, to address whether it is necessary to identify areas of equivalence in terms of qualifications policies;

- lastly, when it comes to drafting of the reference frameworks, to allow the most appropriate level of "granularity" to be adopted to ensure that the qualifications are readily understandable by those involved in the labour market.

This phase involves carrying out research and producing a summary of the existing studies on the jobs concerned.

The feasibility study enables the applicant to address issues of legibility and transferability on the labour market, which are fundamental to the process. This research may be carried out, for example, using the websites of specialised organisations, and if necessary supplemented by in-depth interviews with the certifiers concerned, representatives of professional sectors, etc.

Finally, this study must attempt to identify likely future trends in terms of needs, since the process, by its very nature, needs to be future-oriented.

2.1.1.2 Analysis of real jobs.

The analysis of real jobs is an essential step in any design process, and is a major issue insofar as the findings form the basis of any proposed qualification: the analysis identifies information that enables duties and competencies to be described.

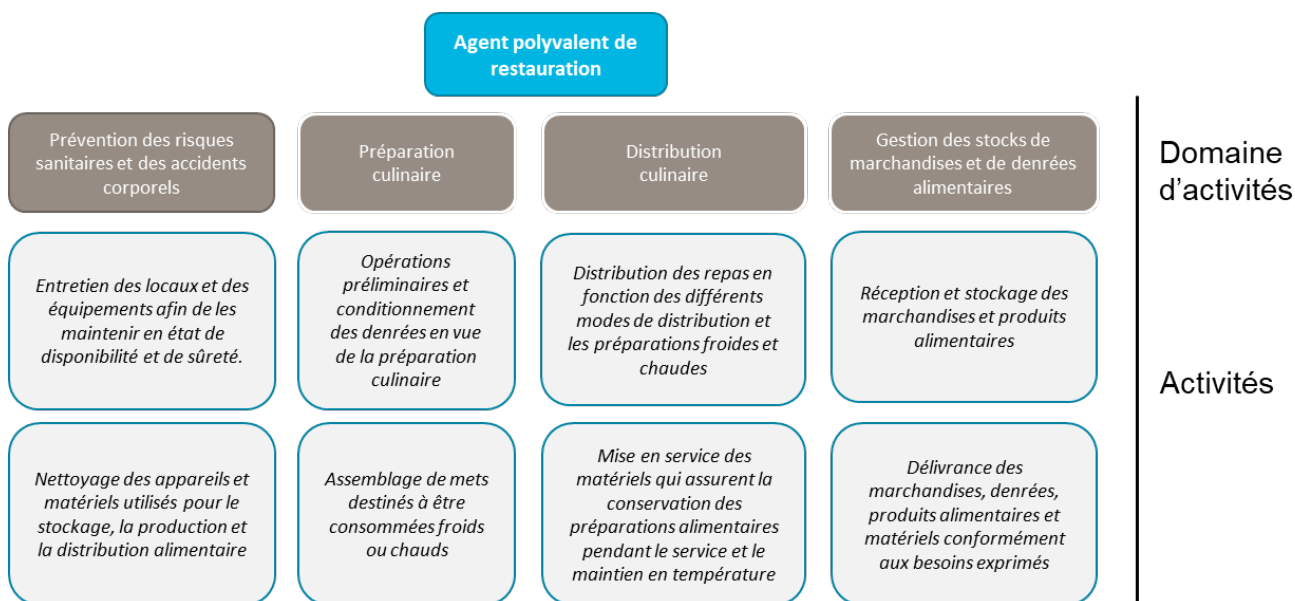
Thus, the aim of this approach is to obtain as much relevant, representative and exhaustive information as possible about the skills and qualities that the people employed in the occupation in question need to possess. Such an approach inevitably involves extensive participation by professionals working in the trades concerned at each stage of the drafting of the reference frameworks.

Thus, in order to acquire this detailed knowledge of the features of the occupation at which a proposed qualification is aimed, it is advisable to undertake **a thorough consultation process with relevant professionals, the aim of which will be to obtain the most accurate picture possible of the typical day-to-day realities involved, by collecting and analysing various items of information, such as the sequence of tasks and operations associated with the jobs in question**, the relative importance of each task (in particular how often it is performed and the conditions under which it is carried out), as well as the performance criteria and the skills and behaviours associated with the exercise of the occupation.

Finally, the result of the analysis of these real jobs must be combined with a forward-looking analysis of the profession aimed at anticipating future trends based on the gathering of business-related data and the views of professionals or experts in the sector.

For instance, in the case of a typical general catering job, the analysis of the actual work involved will enable the following types of duties⁹ to be identified, which will serve as the basic reference framework of the corresponding professional qualification:

⁹ Non-exhaustive representative example
National Register of Professional Qualifications Handbook



2.1.2 Determining the scope of the qualification

Based on an assessment of how well the labour market's competencies needs are being met, the initial results of the analysis of existing jobs (including potential future trends), and an initial outline of the job standards framework, the applicant can proceed to determine the scope of the proposed qualification.

The determination of this scope may obviously also call into question the relevance of the organisation of one or more qualifications currently in the process of being registered; thus, a number of qualifications may be merged or, conversely, divided up.

It is also important to remember that all the various the data regarding the employment opportunities available to the holders of the qualification constitute a key factor in determining the scope of the proposed qualification and its classification in terms of qualification level.

For example:

- employment of the holders of the qualification at a lower level of qualification means that it is appropriate to raise doubts about whether the qualification should continue to be ranked at this level in terms of meeting competencies needs (or simply that the qualification should be discontinued if the certifier already offers a qualification at a lower level in the same area), or about the validity of the competencies framework in terms of enabling the holder to find employment in the intended occupation,
- a highly varied employment and career pattern may suggest that continuing with a single qualification is no longer appropriate,
- a uniform employment pattern, but one that reveals a significant change in the positions being held, requires a re-examination of the scope of the qualification.

Lastly, the determination of the scope of the qualification must include the identification of the occupation(s) to which it is intended to lead. These must not be confused with particular job titles. To this end, it is advisable to establish typical job profiles.

A typical job, as far as professional qualification is concerned, is defined in terms of professional duties and tasks performed in a set of jobs which are sufficiently similar for them to be considered as common to various work environments.

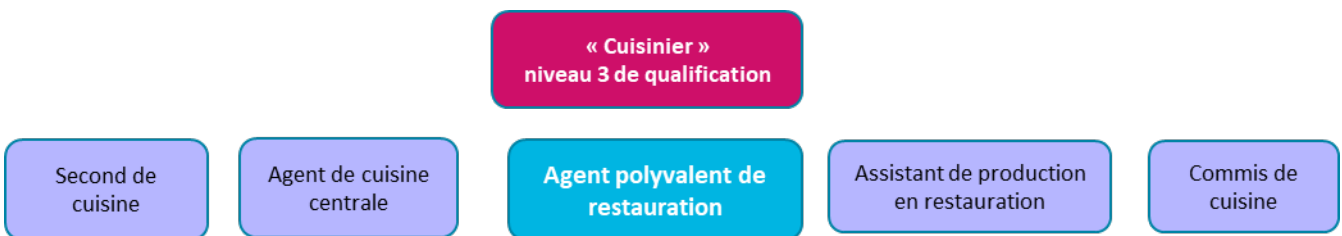
Thus, a typical job profile needs both to represent an actual observed working reality and to be recognised by the relevant professional actors if it is to make sense in terms of the workplace.

The inclusion of several typical job profiles in a single professional qualification is thus possible but must:

- be understandable and logical for employers so that they can easily identify the various jobs that can be carried out by a holder of the professional qualification in question,
- enable the establishment of a competencies reference framework covering the competencies involved in all the typical job profiles concerned.

In this case, optional modules may be included in order to cater for the various types of jobs, provided that the common modules cover the majority of the competencies involved in the professional qualification, thus justifying the creation of a single qualification. The common core of the professional qualification thus provides a key foundation for the occupation(s) in question, with the options offering more specific training; this foundation enables individuals to carry out the independent professional duties that are required to work in each of the occupations to which each of the options leads.

In the case of the general catering job profile, the following overlap with other typical job profiles can be established in order to create a level 3 chef qualification:




This approach has a major benefit, that of enabling greater versatility and therefore enhancing the employability of the holder of the qualification; it is used more frequently in the case of professional qualifications that are primarily geared towards initial training.

However, it presents a significant risk, that of bringing together, within the same qualification, job profiles that are too distinct from each other, and that do not share enough common duties or competencies, thereby running the risk of:

- producing a professional qualification that is not easily understood on the labour market;
- including non-exhaustive competencies frameworks due to the overly broad range of competencies that need to be acquired and evaluated.

Conversely, a qualification designed around a single job profile, defined in a particularly narrow manner, leads to a short-termist and overly specific focus on a specific job and does not allow people to acquire competencies enabling them to move to similar jobs or to adapt readily to changes in the workplace. This type of qualification has little lasting (not to mention potentially little immediate) impact on the professional career of its holder, and the competencies it offers become obsolete more quickly.

 Monitoring of the employment outcomes for holders of each of the options is required in order to assess how well they meet the needs of the labour market, even if the main assessment focuses on the impact of the qualification as a whole.

Special note: the distinction between profession and complementary independent professional activity and the issue of choosing the right register

The Specific Register is intended to be complementary to the RNCP and includes four main types of qualification:

1. authorisations or certifications resulting from a legal and regulatory obligation, necessary for the practice of a profession or professional activity;
2. transversal competencies qualifications that can be used in various specific professional situations;
3. competencies qualifications that are complementary to a particular profession, relating to techniques or methods used in a profession;
4. qualifications related to an independent professional activity that is complementary to a main profession.

This last category raises the question of the distinction between “profession” and “independent professional activity”. In order to be included in the RNCP, a professional qualification must be related to an occupation and must enable an individual to carry out a full-time professional activity (including seasonal work). Otherwise, the activity in question is considered to be a complementary independent professional activity which provides a worker with a useful additional source of income but which cannot be recognised as a training objective in the context of a professional qualification registered in the RNCP.

This situation is generally encountered in the case of self-employed activities, more specifically in the area of well-being and personal development, or when a profession is in the process of dying out due to a lack of economic demand. Conversely, when an activity develops a sustainable economic model, this allows for the emergence of viable professions which can then be registered as professional qualifications in the RNCP.

It sometimes also emerges that holders of a qualification are mainly engaged in a variety of activities, in the case of certain professions where the number of qualified individuals is much too high in relation to the number of real job opportunities on offer. In such cases, certifiers and training bodies bear collective responsibility, either because they have overestimated demand or because their economic approach has been too short-sighted. On the other hand, it is the Committee's responsibility not to mislead future candidates, particularly those undergoing professional retraining, into thinking that they will be able to find satisfactory employment as a result of their qualification being registered in the RNCP.

The assessment of whether this is the case is made on an application-by-application basis, but the recurrence of this situation may lead to the establishment of a more general policy by the Committee with regard to certain professions or professional activities that might be more appropriately included in the Specific Register. However, this state of affairs may change as a result of changes in the labour market. With regard to “by law” registrations, these questions should be raised at the Professional Advisory Commission meetings (CPC) held prior to the submission of applications to the RNCP.

Special note: Naming of professional qualifications

The name of a professional qualification must emphasize its professional scope, thereby making it possible to clearly identify the profession(s) concerned. The name must not make reference to training so as to distinguish it from the different options available for obtaining the qualification.

The name must also be consistent with the qualification level and the reality of the duties performed, so it is not recommended that there be any reference to the idea of management if a significant proportion of those holding the qualification do not occupy a management position in their workplace.

Except in special circumstances, the name of a professional qualification is not considered to be the intellectual property of the applicant; thus, as part of the "on request" registration procedure, the Committee has the discretion to decide on the name of the qualification.

The Committee favours the use of equivalent names in cases where the scope of the occupation is equivalent, which is why many professional qualifications bear the same name.

Names that may mislead people as to the nature of the certification or the body issuing it are also prohibited. Thus, an applicant who applies to have a secondary vocational certificate (CAP) or a bachelor's degree (licence) registered, for instance, will automatically have their application refused. The same applies to any application involving a CQP, where the proposed qualification is not issued by a professional sector.

2.1.2 The job standards framework, cornerstone of a qualifications planning approach

The job standards framework is thus the result of a coherent approach to identifying needs and analysing existing jobs, as outlined above; it aims to provide a list of duties involved and, using a forward-looking approach, to describe possible future developments.

This is the first of a series of reference frameworks aimed at describing existing occupations (the job standards framework), the competencies required to perform them (the competencies framework) as well as the related assessment procedures (the evaluation framework).

The drawing up of the job standards framework should thus be regarded as a crucial component of the qualification design process: by virtue of its coherence and rigour, it provides a vital underpinning of the competencies framework and, in turn, of the future evaluation framework. Therefore, designing a qualification without first establishing a solid job standards framework (or even worse: artificially transposing the aims of a training programme into the language of "competencies") is akin to constructing a building on sand and, in the long run, jeopardises the longevity of the finished product.

Consequently, in its function as a descriptive and normative reference document, the job standards framework should clearly describe the professional duties that are characteristic of a particular job profile, bearing in mind that such duties constitute the basic coherent units of tasks (or sequences of tasks) designed to achieve a specific purpose.

2.1.3 Determining the qualification level within the RNCP

The classification of qualifications by level within the RNCP, in compliance with the CEL, is based on the level of learning outcomes required for the job(s) targeted by the qualification.

However, while the rating level applies to the qualification (and not directly to the occupation), it is important to remember that this rating is based on the analysis of the duties and associated competencies involved in the occupation to which the professional qualification is related.

Thus, in the case of a given job profile, the RNCP cannot rank qualifications at different levels. Nevertheless, within a particular profession, different qualification levels may be attributed insofar as certain professions require varying levels of competencies.

The national framework established by Article L. 6113--1 is defined by Decree No. 2019--14 of 8 January 2019 concerning the national framework of qualifications, which sets out the criteria for the ranking of competencies by level:

- the degree of knowledge associated with the exercise of the professional activity;
- the level of skills, which is assessed primarily in terms of the intricacies and technical complexity of an activity in relation to an overall work process;
- the degree of responsibility and independence within the workplace.

In line with the EQF framework, the French national qualifications framework specifies 8 qualification levels, which include two distinctive features:

- level 1 of the national framework relates to the acquisition of basic knowledge: qualifications at this level are thus not related to a specific occupation and cannot be registered in the RNCP;
- professional qualifications with a level 2 rating are required to demonstrate that the professional duties in question constitute a bona fide occupation, and not merely a professional activity;
- professional qualifications with a level 8 rating are required to demonstrate the existence of specific and advanced competencies, as defined by the terms set out in the national qualifications framework;
- the terms used to describe each qualification level are defined by the national framework, even though they have been developed to be consistent with the European framework.

Levels 2 to 8 of the national framework are described in the Order of 8 January 2019, pursuant to Article D. 6113-19 of the Labour Code. In the case of each level, the learning outcomes involved in the job profiles in question are described in compliance with the criteria laid down by the decree.

LEVEL	KNOWLEDGE	SKILLS	RESPONSIBILITY AND INDEPENDENCE
2	Basic general knowledge and general knowledge specific to an area of professional activity.	Ability to perform simple duties and solve routine problems using simple rules and tools, and to use a number of professional skills in a clearly defined setting.	Ability to work under supervision, with a limited degree of independence. □ Ability to report on one's contribution to the team.
3	Knowledge of basic facts, principles, processes and concepts in a given area of professional activity.	Ability to perform duties and solve problems by selecting and applying basic methods, tools, equipment and information in a familiar setting.	Ability to organise one's work in a relatively stable setting. □ Ability to adapt working methods and behaviour to the circumstances. □ Ability to assess one's contribution to the team.
4	Wide range of practical and theoretical knowledge related to the professional area in question.	Ability to perform duties requiring a broad range of skills. □ Ability to make adjustments to existing solutions in order to solve specific problems.	Ability to organise one's work independently in relatively predictable but potentially changeable settings. □ Ability to take into account linkages with related activities. □ Ability to participate in the evaluation of professional activities.
5	In-depth specialised knowledge, which is regularly updated.	Possession of skills in a familiar area of activity enabling the development of solutions to new problems. □ Ability to analyse and interpret information by applying relevant	Ability to the initiative in terms of managing projects or carrying out duties in unexpected circumstances. □ Ability to manage a team. □ Ability to manage a unit. □

		concepts. □ Ability to pass on skills and methods.	Ability to self-assess one's own performance.
6	Advanced knowledge of a professional area. □ A critical understanding of theories and principles.	Ability to analyse and solve complex unforeseen problems in a specific area. □ Ability to identify solutions and explain them. □ Ability to collaborate with experts. □ Ability to capitalise on and formalise skills and methods.	Ability to organise one's work in complex and changing settings. □ Ability to design and organise work processes. □ Ability to develop the individual and collective competencies of one's team.
7	Highly specialised knowledge, some of which is at the cutting edge of knowledge in a particular area and which straddles several other areas.	Ability to develop alternative business development strategies. □ Ability to lead working groups in interdisciplinary or specialised fields, in a multicultural setting where necessary.	Ability to organise and develop activities while taking into account scientific, societal and ethical issues. □ Ability to initiate and conduct professional collaborations. □ Ability to supervise the work of others. □ Ability to manage and transform complex professional settings. □ Ability to assess the risks and consequences of one's work.
8	Knowledge at the cutting edge in a particular professional area or field of study and which straddles several fields.	Ability to identify and solve complex and new problems involving multiple areas, by applying the most advanced knowledge and skills. □ Ability to design and lead research and innovation projects and processes. □ Ability to make innovative contributions in the context of high-level exchanges and in international settings.	Ability to manage and lead organisations or groups involved complex or interdisciplinary activities. □ Ability to manage complex situations that result in significant organisational changes. □ Ability to assess and anticipate potential consequences in the affected areas.

Depending on the criterion in question, typical job profiles may be rated differently (e.g. a job may involve a high degree of responsibility and independence, while requiring less advanced skills).

In such cases, it is up to France compétences or the certifying ministry, depending on the registration procedure being followed, to rate the qualification based on a combination of the various criteria.

In addition, France compétences, as part of the “on request” application procedure, checks that the standard job, as defined by the applicant, reflects the reality of the situation on the labour market. This verification process may involve any number of methods, including checking the content of job offers for the jobs or occupations in question, the description of the occupations or jobs by the professional sector concerned (or by any other relevant organisation), and the professional circumstances of holders of the professional qualification (average salary, managerial or non-managerial status, etc.). This evidence may be supplemented by information relating to future trends in the profession.

Finally, a single qualification cannot fulfil the requirements of different qualification levels: the typical job profile(s) to which a given qualification is related must therefore be defined precisely enough to enable the corresponding qualification level in the national framework classification to be readily established.

Special note: Information about qualification levels issued by organisations

In the context of an agreement with a learner or a person seeking to validate prior learning, any reference by an organisation to the level of qualification associated with a particular training course, when the qualification in question has not in fact been registered (or is no longer registered), may constitute an offence of deception as defined in Article L. 441--1 of the Consumer Code.

In addition to the aforementioned provision, if a certifier body misleads individuals as to the level of qualification awarded during the registration of its professional qualification, this constitutes a breach of Article R. 6113--14--1 of the French Labour Code, which may lead to the removal of its professional qualification from the RNCP (see 2.6).

The awarding of a qualification should not be confused with:

- the awarding of an academic qualification as defined under the French degree system (bachelor's, master's, doctoral degrees), which entitles the recipient to a university degree. The bachelor's, master's, doctoral and other higher education degrees registered in the RNCP entitle the holder to both a university degree and a qualification ranking;
- the awarding of ECTS credits for a validated period of training that is recognised by other higher education institutions, including when these periods are not associated with a degree-conferring or professional qualification;
- the number of years of training/study after the French baccalauréat; thus the term "bac +" is often misleading because it is not synonymous with an official recognition of the professional qualification concerned.

Furthermore, these periods of training do not automatically correspond to a qualification level, even in the case of courses of study run by a State certifier:

- a so-called "bac +1" course will not lead to a qualification level higher than level 4, the same level as the baccalauréat,
- a "bac +4" course often corresponds to a year of training following a level 6 qualification but does not entitle the holder to a higher level of qualification.

Overall, the award of a specific level of qualification is not determined by the duration of the training required to obtain the qualification, but by the complexity of the knowledge and skills required, as well as the degree of independence and responsibility associated with the job in question.

The duration of training may vary, depending on the candidate's professional experience, his/her previous qualifications or the training organisation, and it is therefore not a sufficient criterion for assessing the level of a professional qualification.

Ultimately, only qualifications which are accredited under a national framework linked to the EQF framework are eligible to award an EQF qualification; thus no qualification can claim to award an EQF qualification level without being registered as part of a national framework.

2.2 The competencies framework and the use of competencies blocks

2.2.1 The competencies framework (purpose, relation to the job standards framework)

Through its various uses and definitions, the term "skill" has become a pivotal concept, gradually replacing the previously ubiquitous term "knowledge". While the term "skill" is defined in many different ways, the focus in what follows is on the idea of "professional skill," as related to the topic of professional qualifications.

A skill can be understood as the ability to apply personal resources (e.g. knowledge, technical skills, interpersonal skills) **as well as those in the surrounding environment in an appropriate way in a variety of situations, in order to carry out an activity with a view to achieving professional objectives. The result of the application of a skill can be evaluated in a given context** (depending on the degree of independence, the available resources and the situation involved), but the skill must be **transferable** from one situation to another.

When it comes to professional qualifications, where the objective is to provide training leading to the award of a qualification, a competency-based approach also involves competencies development: in the case of organisations involved in competencies development, a competency-based approach (rather than one based on types of teaching) requires them to rethink their approach to teaching and assessment: this automatically means moving from a subject-based approach to an occupation-based approach.

Consequently, the competencies framework, insofar as it lists all the competencies and knowledge identified as a result of the analysis of existing jobs (as well as duties performed and occupations or jobs concerned) and specifies the levels of proficiency, needs to be directly related to the job standards framework, and must satisfy two requirements simultaneously:

- in terms of its form: the job standards and competencies frameworks must, on the one hand, be organised so that they are closely interlinked and, on the other hand, must demonstrate the technical expertise of their designers, particularly in terms of the way in which they are drafted (e.g. the precise use of competencies blocks, the consistency of the level of detail used in the definition of activities and competencies, etc.);
- in terms of content: the competencies framework must, on the one hand, identify all the competencies relating to the job standards framework and, on the other hand, reflect the future-oriented approach taken by the designers with regard to the qualification at hand.

2.2.2 Competency-based approach: methodology, objectives (the link with the evaluation framework must be specified)

The adoption of a competency-based approach is a response to the need to adopt a common language shared by all those involved in the area of competencies development, ranging from training organisations to the business world. As the national regulatory authority responsible for the editorial content of national registers, France compétences also needs to ensure that all published reference frameworks comply with a shared set of standards. However, **competency-based approaches are not completely standardised: a competency may be described in a variety of ways, provided that it reflects how a targeted, context-specific range of knowledge is put into practice in a way that is consistent with the expected level of the competency in question.**

Competencies may thus be framed around an action verb in the infinitive (competencies being defined in terms of actions), the "what" (the substance of these action), the "why" or the "purpose" (competencies being defined in terms of an objective or a result to be achieved: in order to, with a view to, etc.) and potentially, the "how" (the application of competencies in relation to the available resources: the focus of the action, the procedure or the means involved).

However, the way in which competencies are defined in reference frameworks sets out the goals to be achieved, but does not provide any indication regarding the way in which they are to be achieved, nor how they are to be

evaluated. It is not merely a matter of “deriving” competencies from a pre-existing training framework ,but rather of constructing the reference framework based on the competencies required, which are determined in turn by the specific needs of the occupation in question.

The competencies framework is an essential reference point and should, thus, be utilised as a basis for creating further reference frameworks:

- the definition of the methods and standards used to assess the competencies in question (the assessment reference system);
- where necessary, depending on how the certifying body is organised, a description of how learning programmes are organised (the training reference framework).

2.2.3 Organisation into of competencies blocks

2.2.3.1 Defining competencies blocks

Competencies blocks are defined in article L. 6113-1 of the Labour Code, which states that **“Professional qualifications are made up of competencies blocks, homogeneous and coherent sets of competencies contributing to the independent exercise of a professional activity, which can be assessed and validated”**.

This brief definition sets out a number of underlying principles:

1. Competencies blocks are the constituent parts of professional qualifications registered in the RNCP;¹⁰ their legal status is conditional on the validity of the qualification to which they pertain. Thus, competencies blocks have no existence independent of particular professional qualifications registered in the RNCP;
2. A professional qualification must, in general,¹¹ be divided into competencies blocks;
3. A competencies block is comprised exclusively of professional competencies because it relates to a professional qualification;
4. the purpose of a block of competencies is to enable an individual to carry out a professional activity independently; in terms of its aims, it must therefore be clearly related to one or more professional activities;
5. It must constitute a coherent and cohesive set of competencies designed to enable this activity to be carried out in an independent manner;
6. the ability to carry out this professional activity independently requires that the competencies in the block be comprehensive;
7. blocks must be evaluable; consequently, they must be linked to methods and criteria of evaluation that enable an individual's proficiency in these competencies to be certified;
8. once an individual has passed the assessment, the block must be validated and the individual accredited.

Competencies blocks must be designed so as to have a social usefulness by providing clear indicators of employability on the labour market.

They constitute first and foremost a modular and incremental means of obtaining a qualification, within the framework of a training programme or a VAE process (or a combination of both).

In the event of failure to validate a professional qualification as a whole, they also make it possible to provide a certification of competencies that can be linked to professional activities that are useful on the labour market, thus enhancing a candidate's employability (unless access to the profession is conditional on achieving full certification). This is especially applicable to VAE programmes in cases where the examination board has only partially certified a candidate. This arrangement preceded the existence of competencies blocks,


¹⁰ The fact that only registered professional qualifications are concerned precludes the use of competencies blocks in the context of the Specific Register

¹¹ See sidebar “*Competencies blocks in the case of professions to which access is regulated*”

a fact that also reveals pretty clearly that the concept of competencies blocks owes much to the validation of prior learning approach (VAE), and that both professional qualifications frameworks and VAE programmes share a common guiding rationale, i.e. one of coordination.

Thanks to their discrete nature, and the fact that they do not necessarily involve the obtaining of a full qualification, competencies blocks also enable:

- **qualified professionals to maintain and update their competencies;**
- **Individuals to move to a related profession by providing missing competencies.**

 In the latter case, the certifier and its partners must pay particular attention to identifying target groups and setting prerequisites, in order to ensure the appropriateness of the particular competencies block in question. In short, given that qualifications listed in the Specific Repertoire are expected to supplement other qualifications, they must necessarily involve the provision of training courses aimed at acquiring competencies blocks.

Competencies that are transversal and that can be used in several work environments or in several professions facilitate mobility and professional retraining. This means that skill blocks are part of the process of adapting to change throughout a person's working life. However, from an operational point of view, this is dependent on the existence of a proper system for recognising the equivalence of qualifications. Equivalence between qualifications is based fundamentally on competencies blocks.

From the user's point of view, a competencies block is awarded for life. However, the certifier may make changes to their qualification professional when professional conditions change or evolve. With this in mind, as with the term of validity of the certification, the term of validity of the competencies block (as far as the acquisition of the qualification is concerned), must be specified clearly and adhered to, unless analysis of existing jobs reveal changes in the competencies required. A person who has completed a competencies block must be able to make an informed choice about the next step in the process of obtaining the qualification as a whole, whether it be by means of VAE or further training.

It is thus important for the people who have not passed all the competencies blocks in a qualification to be able to check which competencies blocks they have completed.

Lastly, it is also worth remembering that a competencies block is not the same as a training module and does not refer to specific training content.

2.2.3.2 Organisation of professional qualifications into competencies blocks

The reference in the definition to the idea that a competencies block “contributes” to a professional activity means that it does not overlap completely with the scope of that activity. However, there should be a clear and demonstrable causal link with the occupation in question. For example, **an excessive number of blocks may result in an inability to establish a causal link between a particular block and the independent performance of a professional activity.** The professional benefit derived from completing a particular block must be demonstrated by the certifier.

Consequently, blocks of competences made up solely of transversal competencies are permissible, but only on condition that the professional relevance of these competencies can be established in relation to the activities set out in the job standards framework.

Thus, as a rule, competencies blocks are not identical with the job standards framework, which often goes into much more detail than the competencies blocks. As indicated above, the reference framework identifies all the duties involved in the performance of the standard job profile, while a competencies block relates to one or more occupations that can be practised independently and are deemed to be of value by the labour market.

Maintaining the balance of this structure is also an important consideration. Thus, if a competencies block were to include the vast majority of the competencies required for the qualification, it would render this modular approach meaningless.

Optional competencies blocks may be also included, but they must meet the following characteristics:

- they must be an alternative to another optional block, whereas an independent competencies block must be registered in the Specific Register;
- they must enable a specialisation that is consistent with the purpose of the qualification;
- the option must not include a significant portion of the competencies involved in the qualification; in such cases, a separate application focusing on the specialisation must be submitted;
- they must be limited in number so as not to undermine the overall clarity of the qualification.

Thus, the optional blocks must be made up of professional competencies that differ from the common core, which are relevant to a specific employment situation and not merely based on an additional level knowledge.

When submitting an application for registration, the applicant must justify the inclusion of each of the options in order to demonstrate that each of them is consistent with the skill requirements of the labour market.

The prerequisites for admission to a training course or the awarding of a competencies block are, by default, the same as for the professional qualification as a whole. Certain competencies blocks may be subject to specific prerequisites in terms of admission to a training course or the awarding of a competencies block, namely

- prior completion of one or more other competencies blocks required for the qualification,
- prior acquisition of one or more other competencies blocks of competencies of the certification, the possession of a regulatory authorisation related to the activities to be carried out as part of the competencies block (or conversely, the absence of such authorisation if the activities concerned fall within the scope of a different competencies block in the professional qualification),
- or, more generally, prerequisites in terms of competencies and/or professional experience likely to ensure that the candidate has a reasonable chance of passing the assessments or of being able to carry out the professional activity independently.

Any such prerequisites must be specified when applying for inclusion in the RNCP or, otherwise, must be kept up to date in the description sheets.

Finally, Article R. 6113--9 of the French Labour Code stipulates that the consistency of competencies blocks is a criterion for registration in the RNCP: "7. The consistency of the competencies blocks comprising the professional qualification application and the specific methods for evaluating them." Conversely, this criterion implies that in the absence of competencies blocks, a professional qualification may not, as a rule, be registered in the RNCP.

Competencies blocks in the case of professions to which access is regulated

The “discrete” nature of competencies blocks as a rule precludes their use in the case of professional qualifications which enable people to enter a profession the access to which is conditional on the completion of a professional qualification. Thus, in such cases, a block does not contribute to the exercise of a professional activity.

The use of competencies blocks in the case of a qualification relating to a profession to which access is regulated may be warranted in situations where the practice of the profession is conditional on obtaining an authorisation, and the certifier may stipulate that this authorisation must be obtained or confirmed as a “necessary condition” or “prerequisite” for obtaining the competencies blocks in question.

Additionally, if the professional qualification in question entitles the holder to practise several occupations, at least one of which is not regulated, the competencies blocks defined by the certifier may enable him/her to practise an independent professional activity.

Other exceptions may be examined on a case-by-case basis if the ministry or certifying body can provide France compétences with the necessary assurances that the validation by a candidate of a particular block of competencies will enable him or her to carry out a professional activity independently.

2.2.4 Taking into account legal and regulatory requirements when drawing up the frameworks

The criterion concerning the need to satisfy legal and regulatory requirements when designing the frameworks is not equally applicable in all cases. The extent to which it matters in assessing the application for registration varies according to the requirements of the trades concerned, which may themselves take various forms. However, in many cases, failure to satisfy this criterion may be sufficient to warrant the denial of registration.

Many trades are governed by regulations which may make access to them subject to:

- an obligation to obtain a qualification, which may or may not take the form of a professional qualification listed in the RNCP,
- a training requirement,
- the possession of authorisations governing certain activities.

In this case, the regulations concerned may relate to general obligations or, alternatively, may specify in detail all the required competencies, as well as the assessment methods or criteria involved. The frameworks submitted must be fully compliant with these standards. However, it is important to bear in mind that, even in such cases, compliance with the regulations as regards this criterion does not mean that the quality requirement for the reference frameworks has been met; the applicant is responsible for ensuring that the regulations have been fully assimilated and not merely repeated in a purely formalistic manner.

In addition to regulated professions, this criterion applies in cases where there is a risk that activities covered by a specific regulatory framework might be performed.

The most frequent example of this is the risk of unlawful medical practice by future certified practitioners in the so-called “wellness” professions, which do not fall within the field of medicine as defined by the French Public Health Code. This risk may be indicated by the presence of competencies or activities belonging to this domain, in cases where the purpose of the activities is stated as being curative or holistic, or even where the terms used in the reference frameworks might lead to confusion as to the medical nature of the qualification.

Similarly, the inclusion of psychotherapeutic methods as part of the exercise of a profession in positions in the fields of human resources, commerce or management, for example, is deemed to entail a risk of manipulation as defined in the French Penal Code.

In addition, depending on the specific circumstances of the profession in question, particular attention must be paid to ensuring that competencies relating to safety at work, consumer and user protection issues, and respect for public order, particularly in relation to health, are correctly defined in the reference frameworks. This applies both to the identification of competencies and to their evaluation. It is thus inconceivable that a professional qualification would be issued to a person incapable of performing his or her professional duties in a manner that is safe for him/her and for third parties.

The issue of requirements for access to certain professions, such as, for example, the obligation to be of good repute, which applies to certain professions, is not dealt with here. On the other hand, a certifying body that does not inform candidates seeking a professional qualification of these requirements, and of the conditions they must meet in addition to possessing the qualification, may be penalised in the course of the registration process, based on its obligation to provide information regarding the features of the qualification.

Lastly, while the role of France compétences is not so much to evaluate the effectiveness of the professional methods associated with certain activities, but rather to assess their social usefulness, activities involving unlawful or criminal conduct, as well as esoteric or religious practices, are not, by their very nature, eligible for inclusion in the national registers.

2.2.5 Taking disability into account in the drawing up of competencies frameworks

Decree No. 2021--389 of 2 April 2021 relating to the conditions for registering qualifications in the national registers modifies, using the same terms, the wording of criteria number 3 of article R. 6113--9 and number 2 of R. 6113--11 to specifically include the need to take account of disability, stating: "In assessing the quality of the competencies framework, account shall be taken, as appropriate, of competencies related to the accommodation of disabilities, accessibility and universal design as defined by Article 2 of the Convention on the Rights of Persons with Disabilities of 30 March 2007."

To ensure that this criterion is properly evaluated, a non-voting expert has been appointed to the Professional Qualifications Committee, at the suggestion of the National Advisory Council for the Disabled, in order to provide the members of the Committee with additional information beyond that provided by the Professional Qualifications Department.

The decree mentions various concepts whose principles and scope are worth recalling in order to clarify their applicability to a competencies framework.

2.2.5.1 Accommodating disabilities in the workplace

Adjustments to workstations respond to the need to accommodate a variety of disabilities. These measures place a particular onus on managers, who, in addition to the issue of making the necessary accommodations, play a crucial role when it comes to ensuring that disabled people are effectively integrated in the workplace.

Because of the sheer number of potential disabilities, accommodating them means taking into account the job of the person concerned, his or her professional experience, skill set and the way the work is organised in the workplace where he or she is (or will be) working.

As far as the particular adjustments are concerned, while they primarily involve occupational health experts in terms of their design, they also involve a variety of other people within a company. Firstly, with regard to management, their role involves identifying the range of potential accommodations, but also the actual implementation of these adjustments. The competencies required to carry out these tasks entail a sound knowledge of the problems associated with disability and the ability to design and instigate the necessary accommodations.

Job accommodations may lead to a review of the way in which work is organised, a reexamination of its effectiveness or simply an enhanced level of clarity as regards its basic principles from a managerial point of view.

Lastly, accommodations:

- are subject to change because they are determined by the progression of a person's disability and the evolution of the workplace,
- must be part of a comprehensive company-wide strategy.

As a result, accommodations for disabilities potentially concern all areas of the company. Some sectors are naturally more directly affected, such as human resources.

Companies' inclusion strategies may involve taking disability into account from the recruitment phase onwards, for example, but there are many possible ways of approaching this issue; with this in mind, the French Secretariat of State for the Disabled has set up a self-diagnosis tool which enables companies to assess their "disability" policies. Human resources are at the forefront of these endeavours, particularly when it comes to the implementation of accommodations such as the purchase of equipment where necessary (special chairs, transcription equipment, etc.) or the funding of support for employees with psychological disabilities in order to help them assume their new responsibilities, for example.

Depending on the profession concerned, the competencies framework should include, where appropriate and to a varying degree, the competencies necessary to make accommodations for disability.

As with all components of a competencies framework, this requires an analysis of existing jobs in order to assess the professional duties involved or affected and the competencies needed to carry them out properly.

Thus, where a competencies framework does not include such competencies, this may be regarded as a more general indication that the competencies planning process is inadequate. Conversely, a framework that lists competencies related to the accommodation of disabilities, but which fails to explain clearly how these competencies are to be incorporated into the performance of the job in question, will be deemed to be unsatisfactory.

2.2.5.2 Accessibility and universal design

The law of 11 February 2005 on equal rights and opportunities, and the civil inclusion of persons with disabilities defines accessibility as the process that "enables the autonomy and inclusion of people with disabilities through the reduction or elimination of discrepancies between their abilities, needs and expectations, on the one hand, and the various physical, organisational and cultural conditions of their environment, on the other. Accessibility requires the provision of the necessary additional elements required to enable persons with permanent or temporary disabilities to be mobile and to be able to enjoy easy and safe access to their surroundings as well as to all places, services, products and activities."

Thus, beyond the specific internal issues within companies, the accommodation of disability extends to the accessibility of places, services, products and activities.

Workers who are involved in the design, creation and operation of physical spaces, services, products or activities must consequently possess the competencies required to address this issue of accessibility.

Ideally, these challenges should not be addressed solely by means of corrective measures, but also by the adoption of a universal design approach that seeks to prevent accessibility problems from the outset. With regard to the accommodation of disabilities, the concept of universal design refers to the design of any product, equipment or service that can be used by any person, without the need for special adaptation or design, irrespective of their disability.

Thus, for example, a UX designer is expected to design the user experience and associated ergonomics with this universal design objective in mind and to carry out his or her work in accordance with the French General Accessibility Improvement Reference Framework (RGAA).

Beyond cases where it is required by specific regulations, universal design is an approach that:

- depends on a company's strategy and the type of products or services that are more or less conducive to its implementation;
- involves devising accommodations that cannot cover the full spectrum of all possible disabilities.

Notwithstanding these limits, the effective implementation of universal design requires that the various actors who participate in the design of goods or services must possess the necessary competencies.

In this respect, competencies planning does not merely involve the analysis of a given job in a company, but may also be used to identify competencies that are lacking in the workplace or gaps in the prevailing approach to certain professional activities. For example, the first electric cars were completely silent. This led to accidents, mainly involving visually impaired people who were unable to use the sound of engines to help them decide when to cross the road. Consequently, it became necessary to add a sound back in.

2.3 Competencies evaluation

As regards professional qualifications, the purpose of evaluation is to ensure that candidates are capable of applying certain competencies in a predefined context. Validation of these competencies, by means of an evaluation, results in the awarding of the qualification in question.

Evaluation in such cases is said to be “certifying” whereas evaluation for training purposes is referred to as “formative evaluation”:

- formative evaluation has an educational purpose in that it is part of the learning process and enables the learner's level of proficiency to be determined;
- the purpose of certifying evaluations is to confirm that learners have mastered the competencies in question.

In addition, it is understood that this certifying evaluation is used to determine, on the basis of objective evidence, whether a candidate can be awarded a qualification. This individual awarding of a qualification has statutory force, as it certifies that the holder of the qualification has mastered a set of competencies which may give rise to associated rights and consequences (level of qualification, official institutional recognition, access to certain so-called regulated professions, etc.).

In view of the importance for the French labour market of having reliable indicators of professional competencies, evaluation is by necessity a process whose quality requires monitoring and oversight. In the case of certain occupations or activities, the issues relating to qualifications are matters of public policy.

Evaluation is based first of all on a particular framework which sets out the relevant evaluation procedures, which must involve observable situations, and the criteria which will allow the evaluator to assess how well the professional skill in question has been mastered.

The various evaluation methods must reflect as closely as possible the realities of actual occupations, specifically the expected level of proficiency in the competencies involved. Evaluation criteria must be sufficiently precise to allow the standardisation of evaluation procedures and provide consistency in terms of the results of the evaluation process.

Quality control measures relating to the evaluation process extend beyond its theoretical framework to its practical implementation, the rules of which must be formalised, adapted to specific requirements, and accompanied by internal or even external monitoring in cases where the certifying body delegates responsibility for the implementation of the evaluation to third parties. Lastly, evaluation requires the establishment of an independent and professional panel whose activities must comply with the framework determined by the certifier and reported to France compétences.

2.3.1 Evaluation framework

The awarding of a qualification must always be a transparent process, in which the quality of evaluation procedures need be monitored and guaranteed, as the rights of both candidates and third parties could be violated — and, in certain situations, the certifier could be held liable — if shortcomings in the evaluation process resulted in the causing of harm.

In order to meet this requirement, evaluation frameworks must provide guidance and facilitate the standardisation of the work of juries and evaluators, as well as helping candidates to prepare for evaluations, and enabling the certifying body to provide reasonable guarantees that the competencies covered by a given qualification have been acquired by the holder.

In the case of each qualification, the evaluation framework sets out what will be evaluated and by what means. Accordingly, it indicates:

- **the situations in which the competencies and, potentially, any associated knowledge may be assessed by means of the evaluation methods;**
- **the criteria to be met or the levels to be reached in order to determine the performance of the candidate based on the observable outcomes.**

Evaluations must involve an "**observable**" situation that closely reflects actual working conditions and enables the candidate's actions and behaviours to be analysed, thereby allowing competencies to be assessed in relation to the expectations set out in the evaluation framework. For this reason, evaluation methods need to be chosen on the basis of their ability to enable such an observable situation to be created.

The evaluation framework must necessarily be consistent with the other components of the qualification, namely:

- the job standards framework (in the case of qualifications listed in the RNCP): professional simulations must reflect the occupational situations described in the job standards framework;
- the competencies framework: the evaluation framework must be consistent with the scope of the competencies framework. Consequently, all the competencies mentioned must be evaluated. Conversely, the evaluation framework must not evaluate competencies that are not mentioned in the competencies framework of the qualification concerned. Nor is it intended to clarify and explain the competencies framework;
- organisation into competencies blocks: an evaluation framework needs to enable competencies to be divided into discrete blocks in order to ensure that they can be acquired progressively and that they can result in the award of a qualification.

2.3.1.1 Evaluation methods

Evaluation methods can take many different forms, but they must be as closely related as possible to the specific duties and realities of the occupation in question. They must be consistent with the expected level of proficiency in the competencies involved.

To this end, evaluation of competencies can be carried out using role plays (either in an actual workplace situation or in a simulated one) or even, but not exclusively, by using work-related materials (in order to check that the candidate has acquired the required knowledge, approaches, physical skills, etc.). Thus, a well designed evaluation scenario will oblige the candidate to draw on his/her knowledge and will, as a rule, obviate the need to resort to evaluation methods that are based on the use of work-related materials.

The design of an evaluation framework, particularly in terms of its evaluation methodology, inevitably involves trade-offs between the aim of optimising the evaluation process and the need to adapt to certain constraints, particularly those of a material nature. All proposed qualifications must nonetheless be able to offer a satisfactory compromise: for example, in the case of qualifications involving the use of physical tools, a completely remote or theoretical evaluation process would be inadequate and would likely undermine its validity.

Special note: Collective evaluations

Even if the evaluation actually results in the awarding of an individual qualification, it may still be carried out collectively, provided that the group setting allows for the evaluation to be individualised. In the case of the evaluation of certain competencies, especially those involving the activities of a group of people, this collective method may even be one of the most suitable ways of measuring proficiency.

However, the panel and the evaluators need to be aware of the biases associated with this type of evaluation (artificial nature of a collective situation, analysis of work and performance without taking into account the candidate's capacity to reflect and rectify a situation at a later stage). It is thus strongly recommended that collective evaluation not be the only method used for evaluating a qualification, or even a competencies block, and that it be combined with an individual interview held after the group exercise.

Special note: Evaluation of work placements

In the case of work placements that are part of the training programme, it is common for these to be evaluated, and this evaluation can have a significant impact on the overall result. In this case, it is essential:

- to look beyond the overall assessment of the placement and to evaluate how well the professional competencies targeted by the qualification have been mastered;
- to eliminate the distortions associated with the specific circumstances in the host company (the success of a work placement depends on the successful cooperation of all three parties involved, i.e. the candidate, the company and the training organisation).

Thus, while work placements constitute an appropriate form of evaluation for the purposes of awarding a qualification, a distinction must be made between the work placement evaluation and the panel's assessment. While they can provide the panel with useful information, the apprenticeship supervisor, tutor or training supervisor may not be a member of the panel.

Special note: Questionnaires

The primary purpose of questionnaires is to evaluate knowledge or competencies and, as a rule, they do not enable proficiency in a professional skill to be assessed directly. This is particularly true of multiple choice questionnaires.

However, when considering the questionnaire as a format, it is important not to overlook the importance of content. Thus, in contrast to multiple choice questionnaires, certain questionnaires consist of a series of practical cases which can be used to generate an observable situation enabling competencies to be evaluated.

In the case of certain competencies, a candidate's proficiency may be more appropriately assessed by means of a questionnaire. This is the case for competencies where knowledge is more important than practical or interpersonal competencies. Conversely, competencies requiring proficiency in technical procedures or behavioural competencies cannot be properly assessed by questionnaire.

Ultimately, questionnaires are not appropriate for use as the main method of evaluating competencies, but they can be helpful as a complementary tool.

Special note: Self-evaluation in relation to qualifications

Self-evaluation has many benefits as part of training programmes because it allows the learner to take ownership of his or her learning and of the related learning process. When it comes to the certification process, this method requires the direct and full involvement of an external evaluator who will use the candidate's self-evaluation as an observable situation which, in this case, will constitute the sole basis for the evaluation.

Provided that this condition is met, self-evaluation allows the ability of candidates to reflect on and analyse their professional role in their present or future working environment to be assessed.

2.3.1.2 Evaluation criteria

It is important to define the criteria on which the assessors will base their evaluation of the candidate's level of proficiency in the various competencies. Thus, evaluation criteria are the most crucial reference point in terms of providing guidance to juries and evaluators, as well as in terms of standardising the way evaluations are carried out.

These criteria generally comprise two components:

- a general required standard (not directly observable);
- one or more indicators (observable and objective items) which, akin to a measuring tool, make it possible to evaluate the extent to which the criterion has been met, whether qualitatively or quantitatively.

These indicators must be designed so as to be consistent with what is being evaluated. When evaluating competencies, it is often necessary to use a combination of criteria that reflect the different aspects of the skill, deemed to be essential for the performance of the professional occupation under evaluation.

These criteria must clearly state the types of information, techniques and behaviours that the individual is expected to demonstrate in the course of the evaluation. They must be consistent with the performance criteria specified in the competencies framework.

The more precise the criteria, the easier it is to standardise evaluation processes and to provide guarantees for certifying purposes, especially when it comes to evaluating behavioural competencies.

△ This objectivity is sometimes lacking in the way requirements are formulated, and terms like "adequate", "suitable" and "correct", while they need not be systematically ruled out, do tend to fall short in terms of providing the desired objectivity.

It is helpful if the certifier includes an evaluation grid along with the criteria. By including the expectations set out in the evaluation framework, and more generally the competencies requirements of the qualification or of the competencies block, this grid can be a useful decision-making tool.

2.3.1.3 Evaluation of competencies blocks and their connection with the overall evaluation result

As independent, discrete units of qualification and components of a professional qualification, competencies blocks serve a number of purposes:

- the evaluation of each of these blocks is carried out independently, and the process involved must include proper procedural guarantees;
- they contribute to an approached to competencies acquisition that is based on stages, and that can potentially combine different forms of learning (training, VAE, etc.), with the aim of obtaining a professional qualification;
- they make a significant contribution to the process of determining whether or not an individual has fulfilled the overall requirements of a particular qualification.

It is sometimes difficult to ensure that the panel responsible for awarding a qualification is also involved in the evaluation of the various competencies blocks, especially given the considerable time that may elapse between the various rounds of evaluation.

Consequently, although the evaluation of a competencies block must be carried out by a specific assessment panel which does not necessarily include the same members as the professional qualification panel, it must nevertheless comply with the standards of collegiality and independence expected of a professional qualification panel (cf. 3.1). This procedural guarantee is all the more necessary in the case of qualifications acquired solely by the accumulation of competencies blocks.

Another appropriate approach might be to provide for a final evaluation that occurs after the competencies blocks have been validated.

However, this scenario has a major drawback because a candidate may potentially validate all the necessary blocks and still not be awarded the qualification if he/she fails the final evaluation. The objective of the final evaluation must thus be clearly defined and justified:

- either in cases where the competencies blocks do not include all the competencies listed in the competencies framework. (This situation is not common because it is difficult to reconcile it with the discrete character of the competencies blocks. For instance, it is not appropriate to evaluate a candidate's linguistic proficiency during the final evaluation if the intended occupation cannot be practised independently in the absence of such proficiency);
- or because the jury needs to assess the coordinated proficiency in competencies belonging to a number of blocks (or, alternatively, because the competencies being evaluated require a prior proficiency in competencies belonging to a number of blocks). In the latter case, the evaluation process has a chronological dimension that cannot be fully captured using the modular approach based on competencies blocks, thus fully justifying the need for a final evaluation.

The most appropriate means of evaluation for this type of assessment is normally an interview with the panel, which may be based on a dissertation or a report on the experience gained in a professional setting and related to the competencies involved in the qualification concerned.

2.3.1.4 Outcome of the evaluation

Once the evaluation has been carried out and the outcomes observed and analysed on the basis of the evaluation criteria, the evaluator must determine whether the competencies measured during the evaluation reflect the level of proficiency specified in the evaluation framework (in cases where the evaluation was not solely intended to evaluate a candidate's knowledge).

The outcome of the evaluation may be intermediate in nature in cases where several evaluations are used to assess the competencies covered by the qualification or the competencies block. In such cases, it is the combined result of all these evaluations that determines the overall outcome in terms of the awarding of the final qualification.

The result may be expressed either as a grade or as a learning outcome (acquired, partially acquired, not acquired). If this information is mentioned in a document containing the general or specific evaluation rules, it need not be specified in the qualification's evaluation framework.

The awarding of a qualification does not require that the evaluation process demonstrate that the whole set of competencies has been acquired by the candidate, and this applies particularly in the case of professional qualifications registered in the RNCP. However, in this specific and exceptional event, the certifier and the panel must be particularly mindful of the nature of the competencies that the candidate has not acquired (or has only partially acquired), and must ask themselves whether it is still possible for the candidate to practise the occupation(s) covered by the qualification without being proficient in the competencies that he/she has failed to validate in the course of the evaluation. Consequently, this type of issue must be addressed in the procedures for obtaining the qualification: for example, through the use of a weighting system or, alternatively, the identification of competencies in which a lack of proficiency is deemed to be grounds for disqualification, depending on the activity or profession concerned. This type of issue needs to be taken even more seriously in cases where the skill involves the performance of a task or professional activity that poses a safety risk to the candidate or third parties.

Hence, the mere addition of individual grades, while it may be useful in terms of yielding an overall result, is not always adequate. It must also be accompanied by checks on the competencies that each candidate has obtained under the supervision of the certifying panel.

Finally, it is important to remember that a candidate who has successfully completed the evaluations required for a qualification in accordance with the rules must be awarded the qualification that he or she has earned. It is specifically forbidden to delay the awarding of a qualification pending the outcome of a course of study that involves the obtaining of a series of certifications over a period of several years. This is designed to avoid a situation where captive audiences are compelled to continue a qualification programme within the same institution. However, exceptions can be made in cases where a qualification cannot be awarded until a regulatory authorisation has been obtained.

2.3.2 Formalisation of the evaluation process

The role of the certifier in monitoring the compliance of the evaluation process means that the associated procedures, and not just the standards set out in the evaluation framework, must be clearly defined and be binding on the certifier and his partners, in cases where he delegates responsibility for carrying out the evaluation to them. These undertakings are binding on the certifier, both vis-à-vis the candidates and France compétences, which may check, in the course of the registration process, or when an application for renewal is submitted, whether these obligations have been fulfilled. The evaluation system must be of a sufficiently high quality so as to inspire confidence in the qualification.

Accordingly, the certifier must make public the following information for the purposes of ensuring enforceability:

- a. the composition of the panel (and in particular the professionals included in it) and the procedure for authorising or appointing its members;
- b. ahead of evaluations: procedures for verifying the prerequisites required to participate in the evaluation, the information provided to candidates about the evaluations and the procedures for notifying them of upcoming evaluations;
- c. during evaluations: the rules governing the conduct of the evaluations, in particular a description of the duties of the person in charge of organising the tests, the provisions for accommodating persons with disabilities;
- d. after evaluations: a description of the procedures for dealing with irregularities, the disclosure of results to candidates, the procedure for retaking the test where required, the procedures for the actual issuance of the certificate and appeal procedures;
- e. the internal oversight processes for ensuring that the evaluation framework is properly implemented and that the rules and procedures laid down are complied with, particularly with regard to combating fraud, especially where a network of partners is concerned.

These rules and processes may be set out, for example, in a general evaluation regulations document, accompanied by a separate evaluation regulations document setting out the specific procedures applicable to the certification in question.

The need to make this information available is all the more vital in light of indicator 16 of the Qualiopi quality certification, which states that: “In the case of training leading to the award of a qualification, it [the training organisation] shall ensure that the conditions under which holders obtain the qualification comply with the formal requirements of the certifying authority”. Thus, the absence of details regarding the processes involved in obtaining a qualification, or the failure of the certifier to describe them in sufficient detail, or to make them public, means that the objectives of this indicator are not fully met.

In the case of certifiers who conduct (either a portion or the entirety of) their evaluations remotely, they must provide a technical description of the evaluation process and the specific methods used to combat fraud. In particular, the methods used to verify the candidate's identity and prevent external assistance during the evaluation must be specified. It is also worth remembering that evaluation methods focused on competencies rather than knowledge are, by their very nature, significantly less prone to fraud or plagiarism.

Lastly, with regard to the issuance of certificates at the end of the evaluation process, the certifier must:

- ensure that the time taken to issue certificates is reasonable so as not to violate the candidate's rights;
- endeavour to prevent the issuing of false certificates, in particular by setting up systems for authenticating results. Accordingly, the sharing with the Caisse des dépôts et consignations of information about holders of qualifications, for the purpose of creating the orientation, training and competencies passport provided for by the French law of 5 September 2018, obviously contributes to this objective;
- ensure that all required information is included and that all prohibited details are omitted.

Special note on the formal requirements for certificates.

France compétences does not provide a certificate template; however, certifiers must adhere to certain formal standards in order to comply with procedures governing the oversight of evaluation methodologies, of which it constitutes the final stage.

Failure to comply with these instructions during the term of registration may result in an inspection report or formal notice being given to the organisation under Article R. 6113--17 of the Labour Code.

Certificates must contain the following items:

- the RNCP listing reference accompanied by the following wording "the decision of the Director of the Director General of France compétences dated xx/xx/xxxx";
- the name of the certifier, accompanied, where applicable, by the name of the company;
- the title of the professional qualification, identical to that used in the RNCP, with no changes or additions;
- the level of qualification (as defined in Decree No. 2019--14 of 8 January 2019 concerning the national framework of professional qualifications), accompanied in all cases by the European Qualifications Framework qualification level;
- the NSF (specialisation) code(s);
- the identity of the holder;
- the date and place of issue;
- the signature of the person in charge of the certifying body or of any person authorised for this purpose by the person in charge.

On the other hand, certificates must not contain any other information that could lead to confusion about the issuer of the certificate, the consequences of its issuance or the nature of the certification.

For example, it is forbidden to:

- include the France compétences logo on the certificate, since the certificate is neither issued by France compétences, nor can France compétences be appealed to in the case of failure to issue it;
- include information protected wording or wording associated with a different certifier (e.g.: "Specialised Master's" if the qualification has not been awarded CGE certification).

In addition, in the event of partial validation or completion of an individual competencies block on its own, a certificate attesting to the award of each competencies block must be issued, which must include:

- the RNCP listing reference accompanied, in the case of "on request" qualifications, by the following wording "by decision of the Director General of France compétences, dated xx/xx/xxxx and for a period of xx years";
- the name of the certifier, accompanied, where applicable, by the name of the company;
- the name of the competencies block, identical to the one used in the registration, without any changes or additions, and an unambiguous indication that it is a competencies block and not an entire professional qualification;
- the NSF (specialisation) code(s);
- the identity of the holder;
- the date and place of issue;
- the signature of the person in charge of the certifying body or of any person authorised for this purpose by the person in charge.

In the case of qualifications awarded as part of a network, the certifier must be able to guarantee that the evaluation system is being implemented in the same way as if it were being implemented by the certifier themselves. Thus, when the certifier authorises an organisation to carry out an evaluation on its behalf, it must ensure that this organisation meets the regulatory or contractual framework that allows it to carry out this evaluation properly. It must also ensure that it has the legal capacity to withdraw its authorisation in the event of any irregularities being detected.

If the network is made up of co-certifiers, the methods for resolving disputes and irregularities must also be clearly defined by the consortium, failing which all its members will be jointly and severally liable.

In addition to providing a description of internal and, where applicable, external oversight procedures, France compétences also ensures that these checks are actually carried out. Thus, in the context of a registration application, applicants are expected to provide:

- a description of the quality checks conducted;
- a summary of the results of these checks;
- any corrective action taken.

These items will be reviewed when applications for renewal are made.

2.3.3 Accommodations for evaluations

Just as accommodations for disability in the workplace require changes to be made to people's workplaces, under the supervision and responsibility of occupational medicine authorities and the employee's company, the same goes for the evaluation process in the case of professional qualifications.

Since the purpose of a professional qualification is to allow its holder to acquire the competencies necessary for the exercise of a profession, the certifier must make accommodations in terms of evaluation procedures in order to reflect possible workplace adjustments that the future holder may encounter in the course of his or her professional life.

Similarly, the certifier must make the necessary accommodations in terms of evaluation procedures to reflect the potential accommodations that the future holder of the qualification may encounter in his or her professional life.

It is clearly unrealistic to attempt to identify in advance all the different potential types of disability and their associated accommodations. The appointment of someone with the necessary competencies to analyse or seek external expertise regarding these accommodations is thus recommended; this is especially helpful when the qualification or the certifier has a large number of candidates each year.

This need is further underlined by the Qualiopi certification process (certification is mandatory for training providers who wish to receive public funds for professional training). Indicator 20 (criterion 4) of the National Quality Standards states that "The provider must have [...] a disability coordinator and a professional development committee".

The existence of a clearly identified "coordinator" that is known to all learners in an organisation can also help to provide guidance, where necessary, so that steps can be taken to have a person's disability recognised, with a view to facilitating their employment prospects.

Thus, it is not sufficient for certifiers to merely grant a standard period of extra time during tests (or a specific period based on the particular candidate's disability), but they must also plan for a range of accommodations that are tailored to the individual's situation. The setting up of a certified workplace training initiative programme (AFEST)

can be helpful when it comes to adapting evaluation procedures that directly reflect future workplace accommodations.

Finally, the scope of accommodations for tests must be broadly specified from the outset and made known to the prospective candidate, in the case of training that leads to a qualification, whether the training is carried out by the certifier themselves or by one of their partners. (Regarding this point, the above-mentioned National Quality Standards state in Indicator 4 (criterion 2) that: "In the case where the provider serves people with disabilities: the provider must demonstrate that he/she takes disability needs into account and makes the necessary accommodations").

2.4 Demonstrating consistency with competencies needs based on employment outcomes (on request applications)

The issue of the economic and social impact of a professional qualification is addressed in the first two criteria for inclusion in the RNCP as set out in the Decree of 18 December 2018:

- “1. the extent to which the jobs held by holders of the qualification correspond to the profession that is the focus of the professional qualification in question, based on an assessment of at least two graduating classes of holders of the qualification”;
- “2. The impact of the professional qualification in terms of access to or return to employment, as measured on the basis of at least two graduating classes of holders and compared with the impact of qualifications targeting similar or related occupations.”

Consequently, it is clear that the focus on graduating classes is key in assessing the extent to which these two criteria have been met.

It is important to note that the 2nd criterion focuses exclusively on data related to graduating classes, which are compared to other similar or related qualifications, whereas the 1st criterion is based mainly, but not exclusively, on an analysis of these graduating classes.

Thus, with regard to the 1st criterion, other points can be used to determine whether it has been met, in particular those relating to the qualification's appropriateness and usefulness. It is worth noting that these factors are of primary importance with regard to inclusion in the Specific Register, but are of only peripheral importance when it comes to the RNCP.

In the process of applying these criteria, account will be taken of the various information provided by applicants, in particular the analyses carried out by the social partners in the sectors in question.

Moreover, information about how the qualification fits into its environment will also be taken into account, based on comparative and/or contextualised data, in terms of classification of competencies, professional field, and employment in similar or related professions.

This review of graduating class data is not required in the case of initial applications for registration of a professional qualification:

- that relates to a profession that appears on the list of professions considered to be undergoing significant change or to be emerging, as drawn up by the Professional Qualifications Committee on the advice of its Scientific Committee (R. 6113--10 of the Labour Code),
- for which registration in the RNCP is required to enable holders to exercise a professional activity in France in accordance with an international standard or a legislative or regulatory provision (R. 6113--9 of the Labour Code).

2.4.1 The term “graduating class” as it applies to the demonstration of consistency with the needs in question

The Larousse French dictionary defines a “graduating class” as “*all people who enrolled in a school in the same year*”. This definition has important implications for training courses and is linked to the traditional practice in initial training programmes of admitting trainees on an annual basis.

However, the meaning of professional qualifications as set out in articles L. 6113--1, L. 6113--4 and L. 6113--6 of the French Labour Code makes it necessary to broaden this definition to include other ways in which qualifications are obtained.

The term "graduating class" should thus be understood in this respect as: **a group of candidates who obtain the same qualification or proposed qualification within a given period of at least one year, regardless of the type of training pathway involved; this definition thus enables France compétences to examine how well the positions held by these individuals match their intended occupations, as well as the impact of the professional qualification in terms of facilitating access to or return to employment.**

A graduating class must be linked either to:

- an existing qualification that is up for renewal;
- **or to a training course designed to provide a qualification or to a process for the validation of prior experience based on a competencies framework and certified by an evaluation framework**, both of which must be broadly equivalent to those contained in the registration application.


It should be noted that reference to a group of holders implies plurality; a graduating class cannot therefore be made up of a single holder.

In the second case, the frameworks in question must be consistent with the proposed qualification. This consistency is assessed by reference to two criteria:


- the need to allow the applying body to take into account feedback about its training or the system used for the recognition of prior learning, both in terms of content and evaluation methods, when putting the finishing touches to a proposed qualification;
- the need to have access to information about the career development of graduating classes that can realistically be related to the professional qualification for which the application for registration is being submitted.

Thus, while a single qualification may be split into a number of qualifications when applying for renewal, this arrangement can only meet the criteria for registration if:

- the different applications are filed concomitantly in order to allow the overall restructuring to be assessed;
- the applications all relate to the same level of qualification;
- the occupations concerned are sufficiently similar to those involved in the previous framework.

 It must also be possible to trace a particular graduating class back clearly and unambiguously to the applicant body or the network of co-certifiers (e.g. in the case of CQPIs) that submitted the application.


In this respect, an organisation which has been a co-certifier as part of a network may submit a qualification proposal, provided that it can prove that it owns full intellectual property rights to the content of the qualification in question.

 **Data relating to a particular graduating class are non-transferable; it follows that an organisation authorised to carry out training or organise evaluations on behalf of the certifier cannot use these same graduating classes to support an application for inclusion in the RNCP.**

This rule may be waived in exceptional cases, where the applicant:

- has obtained the agreement of the certifier, backed up by a document attesting to this agreement;
- has the original evaluation reports with the names of the candidates;
- proves that the holders have not already been used (or will not be used) to support a different registration application from the previous certifier;
- demonstrates that the qualification pathway that it has implemented is sufficiently different from that of the previous certifier, thus making it possible to assess the link between the reference framework being presented and the employment outcomes for the holders.

The term "graduating class" is understood to refer to all those awarded a professional qualification during a given time period, which may not be less than one year. This requirement of comprehensiveness means that the certifier must not omit any location where training sessions are held, holders trained by a partner or any pathway to qualification (for example, VAE or independent candidates), with the exception of candidates who have obtained the qualification by means of complete equivalence with another professional qualification.

 The intentional omission of individuals who were awarded a qualification in a given year, particularly in order to produce a more positive picture of employment outcomes, will be deemed to constitute a fraudulent claim and will lead automatically to the application being rejected. The applicant will be prohibited from submitting a new registration application for the same file for a period of one year after being notified of the ineligibility of the initial application.

France compétences would like to advise applicants that this rule will now be enforced as a matter of course whenever it has external sources that can be used to conclusively determine that this is the case.

More generally, it should be stressed that any registration obtained by fraud is deemed to constitute the offence of forgery as defined in article 441--1 of the French Penal Code and will lead to the immediate and retroactive revocation of the registration.

France compétences evaluates the data provided on graduating classes based on the purpose specified in the two above-mentioned criteria. The suitability of this information is measured in terms of the following factors:

- 1. the extent of a qualification's **impact**: measuring this impact depends on the availability of a sufficiently large amount of data to enable conclusions to be drawn with a reasonable degree of certainty (this requirement is qualified if the occupation targeted by the qualification is rare or is in many instances practised in accordance with procedures specific to a given region or labour pool, especially in the case of islands and overseas;
- 2. **the representativeness of the data** provided: representativeness is based either on an adequate rate of feedback regarding professional outcomes for those holding the qualification or on a representative sample, obtained using formal and auditable methods;
- 3. the **completeness and clarity** of the data provided;
- 4. the sufficiently **up-to-date** nature of the data, both in terms of the year in which the graduating class were awarded the qualification and of the employment data. Thus, at least two of the graduating classes must have completed the qualification less than five years before the year in which the registration application is submitted. It is also recommended that data from the previous two years be provided and that at least one graduating class from the previous two years be included;
- 5. their **reliability**, in particular by demonstrating that there is a monitoring system in place to check the quality of the data.

The usefulness of the information may be determined at the eligibility stage of the application procedure or during the vetting of the application following an analysis of the circumstances of the occupation concerned and the appropriateness of the job profile targeted by the qualification.

In the absence of sufficient evidence that the data is suitable, the criteria pertaining to employment outcomes will be automatically deemed not to have been met, and in this case the Professional Qualifications Committee will reject the registration application as a matter of course. If these data are deemed suitable, but nevertheless display certain shortcomings, they will undermine any positive reading of the employment outcomes that may be made.

2.4.2 Methodology for measuring employment outcomes

Two sets of employment rates are taken into account when assessing a qualification in accordance with the criteria laid down in the decree:

- the employment rate in the intended occupation:
 - *Number of respondents in the intended occupation (minus the people excluded from the calculation) / number of respondents (minus the people excluded from the calculation)*
- the overall employment rate:
 - *Number of respondents in employment (minus the people excluded from the calculation) / number of respondents (minus the people excluded from the calculation).*

With regard to these two rates, monitoring must be carried out on employment outcomes 6 months after the qualification has been obtained, and data relating to the employment situation 2 years on may also be sought. This monitoring involves follow-up surveys of holders of the qualification in question.

Sample case involving the analysis of a graduating class based on 80 respondents: 70 are in employment, 60 in the intended profession. The overall employment rate is 87.5% (70/80). The intended occupation employment rate is 75% (60/80).

The main items included in these calculations are as follows:

The people excluded from the calculation (numerator and denominator):

- those in further education;
- those with work-study contracts, which are treated as further education;
- those who are temporarily or permanently unable to work;
- holders of the qualification who work outside the French labour market, unless the occupation covered by the professional qualification frequently involves working internationally and provided that the evaluation for the qualification took place in France.

Respondents: the calculation only includes survey respondents (numerator and denominator).

The intended occupation: the respondent is considered as being employed in the intended occupation when all the characteristics of the position held (job title, type of company, salary, socio-professional category, level of responsibility and independence, etc.) **closely match the job profile targeted by the qualification.**

Based on these principles, the applicant must provide, when submitting their application, the rate of employment in the intended job and the overall employment rate.

These rates are systematically appraised as part of the application process, based on the following requirements:

- the reliability of the data provided, either with regard to all holders of the qualification, or by means of sampling, for example by examining the position actually held, the consistency between the job titles and the salary paid to the holder as compared to the average salary for the occupation concerned assuming similar levels of experience, etc.
- the jobs identified in the target by the applicant need to fall within the scope of the qualification, and must in particular all belong to the same level of qualification.

Whether or not an individual is employed in the target occupation is measured in terms of the following criteria:

- the job title;
- the level of pay, which must be consistent with that of a principal occupation and in keeping with the rates of pay for the intended position;
- the recruitment status for employees (in particular in terms of socio-professional categories).

In the most complex cases, the assessor may also use a weighted indicator, such as, for example, positions with certain job titles and a salary level above a certain threshold.

In most cases, this process results in the establishment of revised rates which, unless the members of the committee decide otherwise, will be published along with the description of the qualification in the event of approval of the registration application.

2.4.3 Analysis of employment outcomes

The determination of employment rates during the registration application process makes it possible to identify the indicators of employment rates in the intended occupation as well as of overall employment rates, but this is rarely conclusive in itself.

Each indicator needs to be assessed in relation to its particular context:

- firstly, the previous circumstances of the holders of the qualification, such as: whether they were unemployed, employed, looking for work, retraining; previous level of qualification, previous qualifications obtained, etc.
- the employment status of the holders, in order to gauge whether their employment is secure,
- the level of qualification targeted by the qualification,
- the hiring pressures in the intended occupation and the prevailing employment conditions,
- the classification framework of the sector(s) in question,
- the specificities of the labour pool, in cases where employment occurs in a specific regional setting (especially in terms of assessing pay),
- the time needed to build up a clientèle, in the case of the self-employed.

2.4.4 Processing of personal data

France compétences complies with RGPD regulations when reviewing graduating classes in connection with the procedure for registering professional diplomas and qualifications, as well as CQPs, in the RNCP.

The legal grounds for the collection of data stems from Article R. 6113--9 of the Labour Code, in particular criteria 1 and 2, which give France compétences responsibility for reviewing applications for registration in the RNCP under Article L. 6113--5, based on an analysis of “at least two graduating classes of holders of the professional qualification”.

These legal grounds are further specified in Article 3 of the Order of 4 January 2019 which sets out the information required for the registration of professional qualifications and accreditations in national registers, under the procedures set out in Articles L. 6113--5 and L. 6113--6 of the Labour Code. Among other things, Article 3, section 2 requires the following:

“To enable the registration of a professional qualification, diploma or CQP in the RNCP under the conditions provided for in paragraph II of Article L. 6113--5 of the Labour Code, ministries and certifying bodies must provide [...]: 2. the details enabling the professional qualification to be reviewed in accordance with the registration criteria laid down in Articles R. 6113--9 and R. 6113--10 of the Labour Code, as well as the desired duration of registration and qualification level.”

Organisations applying for registration in the RNCP must notify the individuals whose data they are collecting of the following:

- the purpose of this data processing,

- the legal basis for its processing,
- the fact that it will be transmitted to France compétences,
- the period of time for which the data will be kept and the measures put in place to ensure the security of the data during storage and transfer to France compétences,
- individuals' rights in terms of access, rectification, deletion, restriction of use, objection, portability and the establishment of instructions as to what should happen to their personal data after their death, as well as their right to lodge a complaint with the French National Commission for Information Technology and Civil Liberties (CNIL) at any time.

Special note: Emerging or fast-changing occupations.

Each year, as part of the work carried out by the Professional Qualifications Committee, France compétences draws up a list of emerging or fast-changing occupations. This process is provided for in Article R.6113-10 of the Labour Code, which stipulates that qualifications relating to these occupations may be registered without having to demonstrate the career prospects of holders of these qualifications. The purpose of this process is to be able to allow the availability of qualifications to be adjusted more quickly to reflect the competencies needs in these emerging or fast-changing occupations, with due respect for the national priorities set out in the France 2030 investment plan.

This will enable employers to find qualified professionals in emerging or fast-changing occupations, and will mean that the qualifications obtained by individuals will better reflect the needs in professions that have undergone drastic changes.

In order to identify these occupations, France compétences enlists the help of professional sectors and unions. Their suggestions as to which occupations are emerging or changing rapidly are examined by the Professional Qualifications Committee's Scientific Committee. The list has been updated every year since 2020, based on advice from the Scientific Committee and the Professional Qualifications Committee's final decision.

The certifying bodies that wish to submit professional qualification applications in relation to these occupations are thus exempted from having to provide information about 2 graduating classes. The vetting of the registration application in such cases focuses in particular on the quality of the job standards, competencies and evaluation frameworks, as well as their consistency with the needs of the emerging or fast-changing profession in question, the competencies blocks included and, where applicable, the legal and regulatory framework as well as evidence of the existence of oversight procedures enabling the qualification to be implemented consistently throughout the country. In the event that approval is granted subsequent to the endorsement of the Professional Qualifications Committee, these qualifications are registered for a maximum of 3 years.

2.5 Pathways to professional qualification

The pathways to obtaining a vocational certification are not strictly speaking included in the criteria used to decide whether or not to register a qualification, with the notable exception of the validation of prior learning, which must be provided for and properly implemented in order for a qualification to be registered.

2.5.1 The relationship between pathways to qualification and the RNCP

However, there are numerous manners in which the inclusion of a qualification in the RNCP may affect the pathways that are available for obtaining it.

Thus, some pathways only become available once the professional qualification has been registered in the RNCP:

- in the case of the apprenticeship contract (Article L. 6211--1): *“The apprenticeship system contributes to the nation's educational goals. It enhances people's employability. Its purpose is to provide workers who have fulfilled their compulsory schooling requirement with general, theoretical and practical training in order to enable them to obtain a professional qualification attested to by a professional diploma or credential that is registered in the RNCP.”* It should also be pointed out here that CQPs are not mentioned in this article, which means that they are not obtainable via apprenticeship;
- As regards VAE (Validation of Prior Learning): Article L. 6411--1 of the Labour Code states: *“The validation of prior learning mentioned in Article L. 6111--1 is aimed at enabling individuals to acquire one of the professional qualifications registered in the RNCP, which is referred to in Article L. 6113-1.”*

Registration in the RNCP also means that individuals are entitled to make use of professional training contracts as a means of obtaining the qualifications in question. Regardless of whether a qualification is registered or not, professionalisation contracts may be used to obtain a CQP that is not registered in the RNCP or a certificate recognised under the terms of a collective agreement.

If an applicant claims, in his or her application or public communications, that his or her professional qualification can be obtained via pathways that were not authorised at the time of submission, this is likely to call into question the genuineness of the graduating class data provided. Moreover, if these graduating classes do in fact exist, the legal principle according to which no one shall be allowed to benefit from his or her own wrongdoing means that graduating classes that are the result of unlawful use of a qualifying pathway will automatically be deemed ineligible.

Legally, the only qualifying pathway that the certifier is obliged to offer is VAE. However, in practice, almost all professional qualifications provide for at least one training-based pathway. While not prohibited, the fact that a qualification is restricted solely to initial training or, conversely, to continuous education may prompt questions as to whether the professional qualification in question is consistent with the principles of lifelong professional training.

Similarly, unless there are specific standards that stipulate otherwise – for instance those relating to the hazardous nature of an occupation –, restricting access to a professional qualification on the basis of age is deemed to constitute discrimination as defined in the amended version of Article 1 of Law No. 2008--496 of 27 May 2008, which contains various provisions designed to comply with EU law in the area of combating discrimination.

2.5.2 VAE and systems for recognising prior learning

Validation of prior learning (VAE) is closely linked to the concept of professional qualification: while the latter seeks to base itself as closely as possible on the realities of actual occupations in terms of how its frameworks are conceived, VAE involves using the evaluation procedures associated with a qualification to assess the actual working experience of an employed person.

It follows that, when it comes to registration renewal process, the implementation of VAE is a good indicator of how well the professional qualifications in question reflect actual working realities. After all, how can an individual's professional experience be recognised if the professional qualification is divorced from the realities of the workplace?

The lack of use (or limited use) of VAE may also be explained by the presence of five other major factors:

- when competencies in a profession are undergoing significant changes, the higher degree of competencies obsolescence among those employed in the profession in question is consequently an obstacle to the process of validating prior learning;
- in cases where the qualification has low overall take-up and there are a few holders of the qualification;
- some workers may show a greater interest in training, especially those who already have a recognised professional qualification;
- situations involving a position which does not completely encompass the broader scope of the professional qualification in question. (Such situations should be less frequent in the future, given that VAE courses may now be used to acquire competency blocks);
- weak commitment of the certifier and their partners to the promotion of VAE, either because they consider it to be a less rigorous pathway, or because of their economic model.

In the latter case, the low levels of VAE may be reflected in:

- a lack of communication regarding this pathway;
- practical barriers to access designed to discourage people from availing themselves of the VAE option; for example, some certifiers charge excessive fees for taking the examination and/or for providing support during the process, sometimes almost equivalent to the cost of the qualification training programme itself.

It should also be pointed out that while the certifier is required to assess the candidate on the basis of his or her application for validation, which establishes the link between the competencies contained in the job standards framework and those he or she has acquired in the course of the conduct of his/her professional duties, they may carry out additional evaluations similar to those conducted in the other qualification pathways, in order to ensure that the candidate possesses the required competencies.

Finally, in the event that candidates' occupations do not cover all aspects of the qualification, certifiers may identify in their applications candidates who have obtained partial validation or who are involved in blended pathways, which combine recognition of prior learning and training. The same applies to certifiers who have signed up for the experiment provided for in Article 9 III of the Law of 5 September 2018, which allows VAE to be used to earn competency blocks.

Law no. 2022-1598 of 21 December 2022 on emergency measures relating to the functioning of the labour market aimed at full employment extends the framework provided for in Article 9 of the law of 5 September by stating that “the purpose of the measures enabling the validation of prior experience mentioned in section 3 of Article L. 6313-1 is to enable people to acquire a professional qualification registered in the National Register of Professional Qualifications mentioned in Article L. 6113-1 or a competency block belonging to a qualification registered in the abovementioned register.”

The law also explicitly sets out, in the second paragraph of the same article, the legal basis for mixed training courses, stating that “*validation of prior experience includes [...] where appropriate, the training programmes mentioned in Article L. 6313-1*”.

Thus, from 2023 onwards, the renewal process will require that the review of the VAE system in place includes any action taken in connection with the validation of prior experience designed to enable individuals to obtain competency blocks.

Under this new system, when it comes to assessing the registration criterion, greater attention will be paid to determining whether the validation of prior experience has been used to allow individuals obtain qualifications.

Similarly, any concerns regarding the use of VAE can be mitigated if the application makes it possible to identify candidates who have obtained partial validation or who are involved in blended pathways, which combine recognition of prior learning and professional training.

Regardless of the specific use made of VAE, which can only be assessed when the qualification is up for renewal, the registration application must demonstrate the existence of a system that is ready for operational deployment. Thus, while the application may be standardised, it must also be appropriately adapted to the qualification in question.

Given that a significant number of applications in 2022 were basing their VAE system on required periods of experience of at least one year, which is contrary to the relevant legal provisions, it is thus particularly important that, to ensure the eligibility of their applications, applicants understand that all such time requirements have been eliminated. More broadly, it is also forbidden to impose additional conditions of eligibility in addition to those provided for by the Labour Code, unless the law stipulates otherwise. In addition, the competencies booklet template 2, which must be included in the registration application, is expected to include the option of a prior experience validation pathway for competencies blocks, as provided for in the law of 21 December 2022.

3 THE PROVISION OF A PROFESSIONAL QUALIFICATION

3.1 The status of certifying body and the corresponding obligations

3.1.1 Definition of the status of certifying body

The Law of 5 September 2018 provided a definition of certifying bodies for the first time. Thus, Article L. 6113--2 states that "the ministries, the national joint employment committees of professional sectors, the organisations and bodies responsible for registering one or more professional qualifications included in the National Register of Professional Qualifications (RNCP), or one or more qualifications or authorisations included in the Specific Register referred to in Article L. 6113--6, are deemed to certifying ministries and bodies".

This definition stipulates that the status of certifying body is conditional on having at least one valid certification registered in one of the two national registers.

The certifying body may be the sole provider of the qualification in question, but it may also do so in conjunction with other bodies. In this case and upon registration, the bodies involved are all considered as certifying bodies and co-certifiers of the qualification concerned. The body may also have a procedure in place for delegating the conduct of the evaluations for the qualification, without in any way relinquishing its full responsibility.

3.1.2 Obligations stemming from the status of certifying body

3.1.2.1 General obligations of certifying bodies

The law thus allows any body that fulfils the above conditions to avail itself of this status and lays down the associated responsibilities. Thus certifying bodies:

- "send information relating to the holders of qualifications to the personal training account information system, a requirement specified by Decree No. 2019-1490 of 27 December 2019 relating to the sending of information about the holders of qualifications registered in the national registers to the personal training account information system;
- must comply with the "conditions of professional integrity required of certifying bodies" as long as their qualifications remain registered;
- and must not engage in "activities other than those related to professional qualifications".

This focus on good repute and clarity of purpose demonstrates:

- the importance attached to certifying bodies in the competencies development system,
- lawmakers' determination to protect candidates involved in professional training from any risk of fraud as defined in Article L. 441--1 of the French Consumer Code, as well as from the risk of psychological manipulation, which constitutes the criminal offence of fraudulent abuse of a person's ignorance or weakness,
- an awareness of the harmful consequences of the application of unsuitable competencies acquired during training (either in terms of content or setting in which they are applied), both for the holder of the qualification (e.g. inadequate safety rules) and for the people who could suffer as a result, particularly in the case of activities that might involve the illegal practice of medicine or that are likely to result in psychological manipulation.

Such risks are rare, but their consequences can be serious for the people concerned and they thus require that France compétences and its Professional Qualifications Committee exercise special care.

Lastly, France compétences must ensure that the pathways to qualification indicated by the body are legal; hence the certifying body is required to provide details relating to:

- any type of specific approval from the public authorities allowing the performance of the training involved in the qualification;
- proof of compliant and appropriate use of VAE.

The decree of 18 December 2018 specifies several obligations for certifying bodies, in particular a requirement that they be of good repute.

In addition, the decree requires them to notify France compétences within a maximum of three months of any changes to the authorisations, if such exist, that they issue to the organisations that are responsible for training individuals, or for evaluating or issuing professional qualifications and accreditations.

By means of this reporting requirement, the regulatory authorities have established that the certifying body may authorise or delegate all or part of the operational delivery of a qualification to organisations (called "partners") which may carry out training and testing in relation to the qualification, but which are not entitled to award the qualification in their own name (see 2.4). (see 2.4).

3.1.1.2 Obligations arising from the criteria for inclusion in the registers

The decree establishes the requirement that the criteria mentioned in articles R. 6113--9 and R. 6113--11, in relation to which professional qualifications, accreditations or authorisations are registered, must be complied with during the registration process. Consequently, certifying bodies must ensure that the qualification is being implemented in accordance with the procedures set out in the application.

This obligation concerns both the communications requirements relating to the registered professional qualification and the associated training courses, whether they are delivered by the certifying body itself in its capacity as a training provider, or by partners which it has authorised to do so on its behalf. The certifying body must thus clearly indicate:

- the main features of the qualification: wording, content, pathways to qualification and, where applicable, the level of qualification, the target group, the prerequisites for admission to the training programme and for eligibility for the qualification tests;
- the training course(s) leading to the professional qualification, which must be specifically related to the training programme being followed.

This obligation stems directly from registration and is distinct from the contractual obligations arising from the use of the collective trademark registered by France compétences.¹²

3.2 The qualifications system and its role with respect to training

Under Article L. 6313--7 of the Labour Code, training courses leading to a professional qualification registered in the RNCP, to the awarding of a competencies block in one of these professional qualifications or to a qualification registered in the Specific Register are referred to as "certifying training".

The specific purpose of these training courses is to prepare candidates for a qualification evaluation test, or a portion of such a test, if it is a component of a competencies block.

Thus, a training programme designed to provide a qualification registered in the RNCP must meet all of the following conditions:

- must **have as its sole** purpose the obtaining of the professional qualification in question (or of one of its competencies blocks); this does not exclude the possibility of a separate and complementary training

¹² https://www.francecompetences.fr/app/uploads/2020/01/fc_charte_certification_191016.pdf

course, focused on different learning objectives, being taken at the same time, but this course must not be confused with the training designed to lead to the awarding of the qualification;

- **must provide learning content that meets the obligation of preparing candidates for the qualification.** Thus, unless prerequisites have been defined that are tailored to the candidates' specific needs, the associated educational content must enable the candidate to acquire all the professional competencies identified in the qualification's reference framework or in the relevant competencies block;
- **must be provided by a training body duly authorised by a certifying body or ministry**, or in compliance with the legal framework applicable to the qualification, so as to enable the candidate to obtain the professional qualification and/or the related competencies blocks, or by the certifying body itself with a view to ensuring that the training is properly related to the evaluation process.

Communication regarding training for qualification purposes must be perfectly clear and unambiguous. Professional training is a major undertaking for the participant: it will shape his or her future professional life and it is all the more critical when it involves a financial contribution on his or her part.

Consequently, learners should be kept fully informed of:

- the content of the training: registration number enabling the individual to consult the description of the training on the France compétences website, the level of qualification associated with the training, the competencies targeted and the prerequisites for admission to the programme;
- opportunities for holders of the qualification (overall employment rate of holders, employment rate in the targeted occupations);
- the success rate in the programmes (which means both the average exam pass rate as well as the participation rate with regard to the total number of people who started the programme).

Special note: Names of training programmes

A training programme may have a different name than the qualification it is designed to provide, but the certifier and their partners must exercise particular caution in this respect.

Thus:

- the name must be consistent with the scope of the qualification: neither narrow, nor substantially broader; it must reflect the occupations targeted by the qualification and there must be no risk of anyone being misled as to the nature of the positions held by the majority of the holders of the professional qualification in question;
- it must not include terms that might mislead as to the actual qualification level, e.g. using the term "bachelor", generally associated with a level 6 qualification, in the case of a course designed to provide a level 5 qualification would constitute a major breach of the obligation to provide accurate information about professional qualifications;
- if course names vary too widely, this may also cast doubt on whether each of the courses concerned is

3.3 The process of evaluation and awarding of the professional qualification

3.3.1 The respective roles of the panel and the certifier

The panel is responsible for assessing a candidate's performance during the evaluation process. By definition, the panel is a collective body and thus cannot be composed of just one person.

In addition to being responsible for awarding (or not awarding) the qualification or competencies block, the certifier is also responsible for the actual organisation of the evaluation and qualification tests, even if they may delegate the actual conduct of the tests.

The reciprocal roles of the jury and the certifier, and their interactions, must be clearly defined and communicated prior to the conduct of the evaluation. A harmonious relationship, including when it comes to preventing and dealing with any difficulties between these two parties, is one of the key factors in guaranteeing the quality of the evaluation process.

A panel must also be adequately briefed with regard to:

- the content and objectives of the evaluation framework;
- the potential issues involved in evaluating candidates, in particular with regard to preventing discrimination and confirmation bias.

While a certifier may not be responsible for the outcome of the aspects of an evaluation procedure that fall under the remit of the panel, they must take all necessary steps to prevent dysfunctions in the evaluation process, both in terms of the choice of panel members and, more generally, of evaluators, as well as in terms of their preparations for the evaluation process.

When selecting panel members, the certifier must consider their ability to carry out the evaluation in collaboration with the other members of the panel, based on their own professional, technical and behavioural competencies.

While the certifier must ensure that the panel's decision and the way in which the evaluation is carried out comply with the standards set by the evaluation framework, they must also safeguard the independence of the panel once these procedural guarantees have been established; thus they may not substitute themselves for the panel with regard to the evaluation.

In the event of an irregularity occurring in the course of the evaluation, the certifier may not substitute themselves for the panel when it comes to deciding to award (or not award) the qualification or the competencies block, but they may submit a written document:

- requesting that the panel reconsider its decision;
- announcing the holding a further round of evaluations, if necessary with a new panel set up in the same manner.



Given the central role played by the panel, the certifier must be especially meticulous about the make-up of the panel, which must:

- **be clearly distinct from the certifier in order to guarantee that it can carry out its duties independently**; thus France compétences and its Professional Qualifications Committee believe that, for a panel to be legitimate, the majority of its members should come from outside the certifying organisation or from bodies authorised by the certifying organisation, in order to be properly constituted (or that these external members should have a majority of the votes). An exception can be made for panel members whose status and position guarantee the independence of their judgement, such as university professors or other civil servants who enjoy the corresponding statutory guarantees under the terms of a legal provision;

- **be clearly distinct from the training programme**, as mentioned above, since the qualification evaluation process is not designed to assess the quality of the candidate's training programme or the progress he or she has made in the course of his or her training, but rather to evaluate his or her proficiency in the targeted competencies at the time of evaluation. For example, the presence on the panel of instructors who took part in the training of candidates would prevent this distinction from being made. For this reason, some certifiers exclude instructors who participated in the training of candidates from sitting on panels.

It is important to point out that, since the law requires professional sectors to delegate the provision of qualifications to a separate body, the joint panels for CQPs or professional qualifications are set up in such a way as to comply with this requirement.

It should also be noted that the members of a panel must not have any personal or professional ties with a candidate that could lead to a conflict of interest. Thus, for example, an employer may not be a member of the panel that is responsible for the evaluation of his or her employee (or must recuse him/herself during the evaluation of the employee in question). It is the responsibility of the certifier to inform the members of the panel of these conflicts of interest in order to avoid such situations.

The independence of the external panel members from the certifier also entails that they must not occupy a subordinate position vis-à-vis the certifier. Thus, while it is appropriate to compensate a panel member for the time he or she has devoted to his or her duties, this compensation must not take the form of a salary. The same applies to the practical workings of the panel: if the certifier is represented on the panel, panel members must each have the same decision-making powers when it comes to awarding the qualification.

In addition to preserving the independence and impartiality of the panel, the panel set up by the certifier must have the requisite competencies for evaluating the candidates' competencies. It is thus recommended that, in the case of panels relating to a specific profession or professional activity, the panel should be made up mainly of professionals (whether they themselves practise the profession or supervise people who practise it). It is also important to note out that VAE panels must always include at least two professionals and that they must represent at least 25% of the panel's membership.¹³

The impartiality and competence of the other evaluators must also be ensured, for example by means of professional training, an authorisation procedure or a code of ethics.

Finally, the panel's decision must be signed by all of its members and include the title of each member (e.g. name of the chairman, capacity on the basis of which the panel member was appointed), be dated and include a list of the names of all the successful candidates in the session, together with the title of the qualification concerned.

Ideally, the minutes should be drawn up on the day of the evaluations or of the meeting of the qualification panel or as soon as possible thereafter. The minutes should also include:

- the list of candidates who did not pass the qualification, with the names of those who passed competencies blocks being identified;
- the initials of the person in charge of the evaluation process, accompanied, if necessary, by mention of any problems or incidents that may have affected the smooth running of the evaluations.

It is important to bear in mind that the minutes are the only document that can be used to certify that the evaluation process actually took place. In the absence of such minutes, or if they are deemed to be of limited value due to significant formal flaws, the following consequences may result:

- the certifier may be held responsible in the event that the results are contested, or in the cases described in section 3.3.2;
- an application for registration in the RNCP may be rejected if it is based on graduating classes whose existence cannot be demonstrated.

¹³ [Article R. 335--8 of the Education Code](#)

Special note: Qualification and evaluation panels

While the qualification panel is responsible for the final outcome of the evaluation process, its impact on the conduct of the evaluations themselves varies depending on the organisational choices made by the certifiers. Thus, some certifiers use procedures which differentiate between evaluation and qualification panels, with the latter being responsible for validating the results of the evaluation panel and of the other evaluations. In such cases, the respective roles of the two panels need to be clearly specified.

While this approach may streamline the evaluation process, it requires special safeguards to compensate for the lack of direct contact with candidates. Thus, the qualification panel must have at its disposal all the written evidence that was used by the evaluation panel and the evaluators, as well as the specific arguments advanced in support of their evaluations, otherwise it cannot perform its task of validating evaluation results.

Evaluation and certification panels must ensure that the necessary safeguards are in place in terms of their membership and procedures to ensure the reliability of the process (collaboration between members, independence, involvement of professionals).

Under the specific provisions for VAE panels, compliance with the rules governing the composition of panels is assessed on the basis of the conditions set out in article R. 335--8 of the Education Code concerning qualification panels.

3.3.2 Legal responsibilities related to evaluations

3.3.2.1 Responsibility vis-à-vis candidates

Firstly, the certifying body must ensure that all candidates are treated equally and, more specifically, that they are not subjected to discrimination as defined in article L.1132-1 of the Labour Code.

Thus, candidates may not be discriminated against in relation to professional qualification evaluations, on the basis of factors such as:

- social background,
- sex,
- lifestyle,
- sexual orientation,
- gender identity,
- age,
- marital status or pregnancy,
- actual or presumed membership (or non-membership) of an ethnic group, nation or so-called race,
- political opinions or the fact that he or she holds elected office,
- religious beliefs,
- incapacity or disability.

The above list is not intended to be exhaustive. Moreover, the panel must only be provided with the necessary information for properly identifying the candidate and evaluating his or her professional competencies, based on the competencies framework.

Special note: Evaluations and compliance with the GDPR

Certifiers must ensure that the personal data of panel members and candidates is protected, as required by Law no. 78-17 of 6 January 1978 on information technology and civil liberties, amended by Law no. 2018-493 of 20 June 2018 on the protection of personal data, promulgated on 21 June 2018, and by the European Union's General Data Protection Regulation (GDPR), which came into force on 25 May 2018.

Consequently, they are required to put in place a personal data protection policy and to notify candidates and members of the panel of the following:

- the type of personal data gathered;
- the purpose to which this data will be put;
- their rights;
- the parties to whom the data will be sent (including France compétences);
- how long the data will be kept;
- the contact information for the certifying body's data protection officer.

Particular care must be taken to ensure the safety of candidates during the evaluation, especially when it involves potentially hazardous professional procedures. The premises and technical facilities involved must comply with all safety requirements. Any irregularity that might endanger candidates during the course of the evaluation may lead to a decision to suspend or withdraw the qualification (II of article R. 6113--17 of the French Labour Code).

Equal treatment should not, however, be understood as meaning the same as in the case of competitive examinations. A competitive examination is a process of selection, and hence a challenge to an individual result does not systematically invalidate the evaluation of the other candidates and consequently the entire round of evaluations.

The candidate has the right to contest the refusal to award the professional qualification, either by lodging an appeal with the panel of examiners, or with the certifying body. This appeals procedure, which is governed by a regulatory framework for public certifiers, must be formally described in the documentation that must be submitted in support of the application for registration.

Finally, in addition to these appeals, the candidate has the right to seek legal redress, either before an administrative court or before a judicial court, depending on the nature of the complaint or the status of the certifying body.

It should also be noted that although France compétences has the power to impose sanctions on the certifier in the event of significant shortcomings in the evaluation process, it is not within its remit to deal with appeals against the decision to refuse the award of a qualification.

3.3.2.2 Liability vis-à-vis third parties or the holder of a qualification

In many cases, qualifications constitute a condition for authorising a person to perform a specific profession, activity or task in a professional setting, with due regard for issues of public order and consumer safety. The aim of such qualifications is also to protect the holder him/herself, by protecting him/her from risks to his/her own health.

Accordingly, awarding a qualification in circumstances that do not comply with the requirements set out in the registration process may constitute a breach of duty with regard to a third party or to the holder of the qualification himself/herself, in the event of damage resulting from the holder's lack of competency. The extent of this

responsibility varies according to the nature of the deficiency in the evaluation process, and particularly according to the degree to which it was intentional, as well as to the extent of the harm suffered by the third party or the holder of the qualification in question.

Special note: Evaluations carried out in other jurisdictions and the awarding of professional qualifications

As a rule, a professional certification that is recognised by the French national qualifications framework must be issued on French soil, since it is issued in accordance with applicable French legislation and under conditions that ensure that France compétences can carry out an external inspection, if necessary.

However, it is nevertheless permissible for qualifications to be awarded in the following situations, providing that the final assessment takes place in France, whether in person or remotely, and provided that the institution delivering the training to the candidate is properly accredited by France compétences.

Failing this, a certificate of completion can be issued by the institution in question, but this does not entitle the candidate to recognition under the national qualifications framework.

3.4 Managing partner networks

In accordance with the principle of freedom of trade and industry, certifying bodies enjoy considerable leeway when it comes to organising their network, whether by setting up a network of co-certifiers, or by authorising partners to conduct training to prepare candidates for evaluations and/or to conduct these evaluation processes.

3.4.1 Freedom of association between co-certifiers

Organizations applying for registration in one of the national registers are free to organise themselves into a network of co-certifiers, provided that each member of the network is of good repute and is not disqualified from filing an application.¹⁴

It should be noted that the eligibility requirement for applications for inclusion in the RNCP relating to the analysis of the career progression of at least two graduating cohorts of holders of the qualification applies to the group as a whole. Thus, it is not essential for each individual co-certifier to provide this information when registering for the first time or when there is a change in the structure of the group.

In the course of registration, new co-certifiers may be identified or replace previously identified co-certifiers, provided that they meet the stipulated obligations and inform France compétences, within a maximum of three months, by means of the dedicated electronic procedure,¹⁵ specifically by providing the partnership agreement that is binding on co-certifiers.

3.4.2 Partner networks

As indicated above, certifiers may use a network of authorised partners who are entitled to prepare candidates for the qualification and/or to carry out the evaluation process on behalf of the certifier. Responsibility for the panel that awards the qualification lies solely with the certifier or the co-certifiers.

Partners are required to apply the qualification procedures set out by the certifier. In order to ensure that these procedures are followed in a consistent manner throughout the network of partners, the certifier is required to formally set out, for the benefit of their partners, the relevant requirements and to implement procedures for monitoring how the evaluation tests are being conducted. This constitutes a criterion for registration.

To this end, when applying for registration, the certifier is required to provide the sample agreements and contractual specifications that are binding on the parties. These documents must include the procedures for dealing with irregularities and, where applicable, the procedures for terminating the partnership.

In their ongoing communications with France compétences, certifying bodies must take particular care to ensure that they provide the necessary information to identify the partners involved. This enables users to be kept properly informed about the bodies that are actually authorised by the certifier and enables its intellectual property to be protected. France compétences can thus keep the various purchasers and funders informed of the bodies that are actually authorised to participate in the qualification process, particularly for the CPF application.

3.4.3 Operation of networks

Certifier(s) is/are responsible for the operation of their network throughout the duration of their registration and subsequently, where applicable, during the registration renewal procedure. As stated above, they are responsible

¹⁴ - penultimate paragraph of Article R. 6113--17 of the French Labour Code
- paragraph 2 of Article 5 of the Order of 4 January 2019 which sets out the information required for the registration of professional qualifications and accreditations in national registers, under the procedures set out in Articles L. 6113-5 and L. 6113--6 of the French Labour Code

¹⁵ <https://www.francecompetences.fr/fiche/organismes-certificateurs-un-nouveau-module-disponible-pour-actualiser-les-fiches-publiees-dans-les-repertoires-nationaux/>

for putting in place an adequate oversight policy to ensure the operational consistency of their network in terms of compliance with the undertakings that were the basis for the decision to grant registration of their qualification as well as in terms of the clarity and transparency of the communication provided by their partner(s).

In the event of irregularities being identified, the certification bodies must promptly take measures to put a stop to the failings that have been discovered. Information about oversight procedures, irregularities identified and measures taken as a result may be usefully included in applications for the renewal of qualifications, as this may help the committee get a better sense of the effectiveness of the procedures in question.

Lastly, it is important to remember that each network of certifiers must, as part of the application procedure for registration in the RNCP (as well as throughout the duration of the registration period), submit all data relating to the career development of holders of the qualification, based on the results of the "career surveys". Data may be requested on individuals partners and training locations during the processing of the registration application or in the course of inspections carried out during the period of registration.

3.5 Recognition of correspondences and equivalences

Correspondence is defined as a relationship of likeness or conformity between two distinct objects. It is distinct from the notion of equivalence which is used to describe the relationship between two objects of identical value.

Ultimately, the two concepts are complementary and, above all, mutually related: it is because two blocks have corresponding contents and belong to the same quality framework – i.e. the RNCP – that they can be considered as having the same value and thus as being equivalent.

In its capacity as custodian of the national framework, France compétences and its Professional Qualifications Committee are responsible for establishing a framework for comparing professional qualifications. It is understood that this comparability involves:

- the assigning of a level of qualification (*“and the potential recognition of corresponding qualifications awarded in States belonging to the European Union”*),
- to a lesser extent, the classification of qualifications in terms of NSF terminology,
- the identification of correspondences between professional qualifications and the competencies blocks they comprise.

Thus, lawmakers have given the Professional Qualifications Committee a particularly prominent role in this area, since Article L. 6113--7 of the Labour Code stipulates that "the France compétences Professional Qualifications Committee may submit to the ministries and certifying bodies a request for the establishment of full or partial correspondence between the professional qualifications for which they are responsible and equivalent professional qualifications (including their competencies blocks) at the same level. In order to ensure that this power is effective, the same article goes on to state that "if the ministry or the certifying body fails to comply with this request, France compétences shall withdraw the professional qualification issued by the body in question from the register".

Thus, in terms of the RNCP, the committee enjoys a number of prerogatives, regardless of the registration procedure, and may thus trigger actions that might call into question any subsequent decision regarding the registration of a qualification, even when such a decision is not within its own purview.

Article R. 6113-13 of the French Labour Code specifies the procedure to be followed, which involves issuing a notification that a recommendation has been made, followed by an adversarial phase that may last up to six months, followed by a six-month phase to enable the correspondence to be established if the recommendation is upheld at the end of the adversarial phase.

These correspondences have two objectives as far as the user is concerned, depending on their scope:

- either they apply to the qualification as a whole, in which case they basically serve to allow people to continue their education in the event that the certifier specifies certain qualifications as prerequisites for admission to a training programme;
- or they can be partial (i.e. involving competencies blocks), and thus aimed at modularising the process of acquiring a qualification on the basis of competencies that have already been validated in the course of obtaining a different professional qualification.

This latter category of correspondences also applies to competencies blocks belonging to a previous version of the qualification in the event of renewal. Hence, the certifier must determine if the previous version of a competencies block is equivalent to one or more blocks in the new version of the qualification. This type of correspondence is also the most meaningful in terms of promoting a modular and incremental pathway to qualifications, especially in light of the new provisions introduced by the law of 21 December 2022.

In terms of methodology, the process of identifying equivalence requires the following:

- an analysis of the duties involved in order to determine the scope and to establish whether the professional activities associated with a qualification, or competencies block, are included in a qualification or in one of its blocks;
- an analysis of the competencies involved in order to whether the level of proficiency is equivalent.

This process of identification does not require any prior mutual recognition in cases involving several different certifiers.

The process of determining the scope may well throw up various scenarios, for example:

- a competencies block may correspond to number of blocks in another qualification;
- a qualification may be equivalent to portion of a qualification belonging to a superior qualification level;

Conversely, differences in assessment methods are not a justification for a failure to identify correspondences since all evaluation systems are all subject to the national framework and to the quality assurance process it involves.

It is also important to remember that equivalences can only be granted between professional qualifications, or their blocks, that are part of the national framework. To do otherwise would be to allow people to acquire a level of qualification (or a portion of a professional qualification) simply by accumulating a series of individual competencies blocks without any of the quality guarantees provided by registration in the RNCP.

The only possible exception, except where special legislation exists, is the one provided for by the legislator, which stipulates that qualifications and authorisations in the Special Register "may, where appropriate, be deemed to correspond to competencies blocks belonging to professional qualifications".¹⁶

The concept of correspondence should not be confused with other methods of simplifying educational pathways, such as exemptions from or waivers of tests required for the acquisition of diplomas awarded by the State. These exemptions or waivers must be provided for in legislation and are not considered to constitute correspondences, as defined in the Labour Code, unless they result in the acquisition of a vocational qualification or block of competences in themselves.

In order to be meaningful, the equivalence between different qualifications and competencies blocks requires the following conditions to be fulfilled:

- professional qualifications must be based on competencies blocks (established using a standardised method);
- a quality framework which is itself consistent across the different registered professional qualifications and which is based on common objectives;
- tools enabling ministries and certifying bodies, as well as the Professional Qualifications Committee, to identify correspondences between competencies blocks and to manage them proactively in the light of registration decisions and changes to the frameworks.

These conditions are beginning to be met, with the majority of RNCP professional qualifications having been renewed since the law of 5 September 2018 came into force.

At the end of 2022, the Professional Qualifications Committee thus requested that certifiers undertake the process of identifying equivalences. The Professional Qualifications Committee will begin making recommendations based on this information beginning in the second half of 2023.

¹⁶ L. 6113--6 of the French Labour Code

3.6 External oversight by CF and preparations for registration renewal

3.6.1 Oversight of certifying bodies and their partners

As part of its task of regulating the quality of professional qualifications, France compétences has been given the power to oversee certifying bodies, a power which was expanded by Decree No. 2021-389 of 2 April 2021. In order to ensure that qualifications are being implemented properly, France compétences is using this new legal framework to strengthen its oversight procedures.

These oversight procedures focus on the need to ensure that the criteria that were used to approve inclusion in the national registers are being complied with. The most serious breaches of these undertakings are detrimental to the public interest and must therefore be halted, and if necessary punished, immediately, without waiting for the expiry of the qualification.

Moreover, this power of oversight was expanded by Decree No. 2021--389 of 2 April 2021 and now extends beyond the undertakings contained in the registration application (see 3.1.2). Thus, France compétences can now check whether the information provided by training bodies about their qualifications and associated qualification pathways complies with the criteria that led to them being registered in one of the two national registers.

France compétences may draw up an inspection report in order to discuss its findings with the body in question. It may also request any document relating to the implementation of the professional certification; failure to respond to this right to disclosure constitutes, in itself, a breach.

If France compétences is in possession of sufficient factual evidence to establish a breach, either as a result of an inspection report or based on the right to disclosure, or in the light of the information that is directly available, it may give formal notice to the certifying body to comply with its obligations within a period of 60 days.

In the event of a failure to comply (or partial compliance), the Director General of France compétences may revoke all or a portion of the qualifications held by a certifying body.

A penalty may also be imposed directly without formal notice if, following formal notice followed by compliance, it is established that the same breaches that warranted the previous formal notice have been repeated during the period of registration.

3.6.2 Preparations for the renewal of a professional qualification

Although professional qualifications are not legally subject to renewal, in the sense that each application is examined according to the same registration criteria and the same requirements, the certifier is expected to state how they have used the recognition resulting from the registration of their professional qualification.

By contrast, a certifier who has been put on notice during the period of registration of their qualification will be expected to present especially compelling evidence with regard to the criterion pertaining to the implementation of procedures for monitoring how the evaluation tests are conducted.

This evidence should indicate what concrete measures have been put in place to prevent the recurrence of the breaches observed, whether these breaches resulted in a finding of non-compliance or in the withdrawal from the registers.

Finally, as of January 2022, each approval is accompanied by a notice of approval, which may include recommendations or points requiring attention. While not relieving France compétences of the obligation to review the entire application with respect to the registration criteria, failure to take these recommendations into account in an application for renewal may adversely affect the outcome of the application.

3.7 Expiry of a professional qualification

As a rule, a qualification expires on the date of expiry of the period of registration, which may not be more than five years after its effective date of registration.

Lawmakers have not authorised the extension of qualifications registered in the registers in the absence of a review based on the established procedures and criteria.

This reflects both the concern of the national parliament that qualifications be tailored to the needs of the labour market and the national economy and the fact that past registration does not give any particular entitlement to renewal.

Consequently, subject to the provisions of article L. 6113--9 of the French Labour Code, which are intended to protect access to qualifications already in place, the expiry of qualifications entails the halting of access to the associated programmes under the conditions made possible by their inclusion in the RNCP. The official description of the qualification is required by law to specify the deadline for the awarding of the qualification for those who have begun the process of acquiring it.

In the following exceptional circumstances, the Director of France compétences may take steps to suspend or remove a qualification from the national registers:

- as a consequence of an inspection provided for in Article R. 6113--17 of the Labour Code;
- as a consequence of the refusal to take into account a recommendation from the Professional Qualifications Committee relating to the creation of connections under the terms of Article R. 6113--13 of the Labour Code;
- in the event of failure to provide data relating to holders of qualifications as provided for in Decree No. 2019--1490 of 27 December 2019 relating to the sending of information relating to the holders of qualifications registered in the national registers to the personal training account information system, upon notification by the Director General of the Caisse des dépôts et consignations.

In addition, France compétences shall terminate the registration when:

- the legal basis for the qualification no longer exists: i.e. if the standard governing accreditation or the statutory provision that served as the legal basis for the registration is withdrawn in accordance with normal legal procedures;
- if the certifier gives notice that the qualification has lapsed;
- in the event that the qualification is renewed (with a professional qualification level at least equivalent to the previous one) and a new description is issued replacing the previous one;
- within 4 months of the approval if the approval is in breach of a standard;
- at any time, if the approval was based on fraudulent information provided by the applicant.

GLOSSARY

This version of the glossary may be updated to take into account the joint work in progress under the national cross-sectoral framework agreement of 15 October 2021.

Competencies blocks

Part of a professional qualification constituting a homogeneous and coherent set of competencies contributing to the independent exercise of a professional activity and which can be evaluated and validated.

National qualifications framework

Reference framework used to determine the level of qualification of professional qualifications included in the national register of professional certifications (RNCP) (levels 2 to 8) according to the complexity of the knowledge and competencies acquired that enable people to carry out professional duties with varying degrees of responsibility and independence. The national framework is a part of the European Qualifications Framework (ECC).

Certificate of Professional Qualification (CQP)

Certificate issued by a professional sector attesting to the acquisition of professional competencies relating to a profession practised in a particular sector or group of sectors.

Professional qualification

A professional qualification is defined as both:

- as an awarding procedure by which a certifying body certifies, upon completion of an evaluation process, that a person has mastered a set of competencies necessary for the exercise of a profession, thus enabling a person to exercise the associated professional activities;
- as a pre-established framework defining the professional activities concerned, the competencies that need to be assessed in order for these activities to be carried out and the methods and criteria used for such an evaluation.

Only those entities that meet this definition and are registered in the RNCP can be referred to by the term "professional qualification". With some exceptions, professional qualifications are also divided into competencies blocks.

An active professional qualification

A professional qualification registered in the RNCP is said to be "active".

An inactive professional qualification

A professional certification is said to be "inactive" when the RNCP registration expiry date has passed. The professional qualification can continue to be awarded in such cases, but only to candidates whose training or validation of prior learning began before the registration expiry date of the professional qualification.

Co-certifier

A co-certifier has the same prerogatives as a certifying body; as a rule, it may issue the professional certification in its own name and is jointly and severally liable vis-à-vis France compétences for the proper provision of the professional qualification by all its co-certifiers.

France compétences' Professional Qualifications Committee

The Professional Qualifications Committee is made up of a chairperson and 18 voting members:

- 8 permanent representatives of the State, representing the minister responsible for vocational training, the Minister for Education, the Minister for Higher Education, the Minister for Health, the Minister for Sport, the Minister for Agriculture, the Minister for Social Affairs and the Minister for Culture;
- 2 representatives from regional councils or overseas deliberative assemblies with responsibilities for vocational training;
- 5 representatives from national trade union organisations that represents employees from different sectors;
- 3 representatives from national employers' organisations representing members from different sectors;
- 1 non-voting member, representing the National Advisory Council of Disabled Persons.

The main responsibilities of the Professional Qualifications Committee are:

- issuing of approvals related to applications for registration in national registers;
- drawing up of a list of occupations considered to be undergoing significant change or to be emerging, on the advice of the Scientific Committee;
- sending out requests to the ministries and certifying bodies requesting the establishment of total or partial equivalences between the professional qualification for which they are responsible and equivalent professional qualifications (including their competencies blocks) at the same level;
- helping to harmonise the terminology used by the ministries and certifying bodies in the titles of professional qualifications, the activities they cover and the competencies they attest to;
- ensuring the quality of information provided to individuals and companies regarding professional qualifications and qualifications and authorisations registered in the national registers, as well as qualifications recognised in the Member States of the European Union or parties to the Agreement on the European Economic Area; and ensuring in particular that the reference frameworks for professional qualifications registered in the national register of professional qualifications are accessible to the public;
- contributing to international efforts in the area of qualifications;

Professional advisory committee (CPC)

Unless it falls under the "on request" registration procedure and unless it is specifically exempted in cases involving diplomas issued by the Ministry of Higher Education, the creation, modification or removal of a professional qualification requires the approval of a professional advisory committee made up of a majority of representatives from the social partners concerned. There are currently 11 CPCs linked to major business sectors.

Professional skill

A professional skill involves the effective use of a person's resources to carry out an activity in order to achieve specific professional objectives. The result of its use can be evaluated in a particular situation and can be transferred from one professional environment to another.

Correspondences and equivalences

Correspondence is defined as a relationship of likeness or conformity between two distinct objects. It is distinct from the notion of equivalence which is used to describe the relationship between two objects of identical value.

Correspondences may either apply to the qualification as a whole, in which case they basically serve to allow people to continue their education, or they can be partial (i.e. involving competencies blocks), and thus aimed at modularising the process of acquiring a qualification on the basis of competencies that have already been validated in the course of obtaining a different professional qualification.

Correspondences are established between professional qualifications registered in the RNCP or between competencies blocks and qualifications in the Specific Register.

RNCP registration criteria

On request applications for inclusion in the RNCP are considered on the basis of nine criteria set out in Article R. 6113--9 of the Labour Code, which constitute a set of guidelines to help in deciding whether to approve the application. These criteria relate in particular to:

- how well the positions held by holders of the qualification match the occupations targeted;
- impact on access to or return to employment;
- the quality of the job standards framework, the competencies framework and the evaluation framework, as well as their overall consistency, and issues relating to the accommodation of disabilities, accessibility and universal design;
- the implementation of procedures to monitor all the methods used to conduct evaluations;
- consideration of the legal and regulatory requirements linked to the pursuit of the profession targeted by the professional qualification;
- the option of obtaining the professional qualification through validation of prior experience;
- the overall coherence of the competencies blocks that go to make up the professional qualification, as well as of their specific assessment procedures.

Evaluation criteria

The evaluation criteria define, in line with the performance criteria identified in the competencies framework, the types of information, techniques and behaviours that a candidate must demonstrate during his/her evaluation, in order to provide guidance to the jury and the evaluators and to ensure the consistency of the evaluation practices.

Typical job profile

A typical job is defined in terms of professional duties and tasks performed in a set of jobs which are sufficiently similar for them to be considered as common to various work environments. The definition of the typical job profile determines the way in which the various reference frameworks involved in a particular professional qualification are designed.

So-called registration “by law”

Procedure for registering professional diplomas or qualifications in the RNCP established by the ministries after consultation with and approval a professional advisory committee (CPC) made up of representatives of employees and employers, or by the advisory committees of the Ministry for Higher Education.

So-called registration “on request”

Procedure for registering professional qualifications or Certificates of Professional Qualification (CQP) in the RNCP after approval by the France compétences Professional Qualifications Committee in accordance with pre-established registration criteria.

Certifying training

The term "certifying training" refers to training courses that lead to a professional qualification registered in the RNCP, to the completion of a competencies block in one of these professional qualifications or to a qualification registered in the RS.

Training and/or evaluation authorisation

Authorisation delivered by the ministries and certifying bodies that enables an organisation to provide training leading to a qualification and/or to organise evaluation tests on behalf of the certifier. Authorizations may be issued free of charge or may be subject to payment, depending on the relevant statutory legislation or regulatory procedure laid down by a standard. The granting of an authorisation is discretionary and entails the responsibility of the certifier with regard to the uses to which it may be put.

Panel

The panel is responsible for assessing a candidate's performance during the evaluation process. By definition, the panel is a collective body and thus cannot be composed of just one person.

Evaluation methods

Evaluation methods are chosen on the basis of their ability to enable an observable situation to be created. This “observable” situation must reflect as closely as possible actual working conditions and enable the candidate's actions and behaviours to be analysed, thereby allowing competencies to be assessed in relation to the expectations set out in the evaluation framework.

Qualification and level of qualification

A professional qualification represents a person's ability to perform a specific occupation or job. A professional qualification certifies that its holders possess the professional competencies required to perform the professional activities associated with a given occupation or job; it is in this sense that holders are said to possess a professional qualification.

Professional qualifications are classified by level of qualification based on the degree of proficiency required to perform the professional activities in question. The level of qualification is used as a benchmark across the entire labour market, enabling the professional capacities of individuals to be evaluated, even though a particular qualification may be associated with a specific profession.

Certifying bodies and ministries

The ministries, the national joint employment committees of professional sectors, the organisations and bodies responsible for registering one or more professional qualifications included in the RNCP, or one or more qualifications or authorisations registered in the Specific Register, are deemed to certifying ministries and bodies.

Certificate

A certificate is the physical or electronic document that attests that an individual has been awarded a professional qualification by a certifying body after successfully completing the evaluation process.

Competencies passport

The Competencies Passport is intended to highlight and authenticate all of an individual's certified professional competencies. It involves the collection from certifying bodies of individual data concerning the holders of RNCP professional qualifications and of qualifications and accreditations from the Specific Repertoire, as well as the inclusion of employment data in order to record people's career details. It is personal and confidential and its sharing and/or use is the sole prerogative of the individual. The sharing of the data used to create the competencies passport is a legal obligation incumbent on the ministries and certifying bodies.

Prerequisites

Conditions that a candidate must meet before enrolling in a training course leading to the award of a qualification or before being allowed to take evaluation tests. Prerequisites mainly involve the candidate's possession of a specific qualification or level of qualification, a regulatory authorisation or an administrative authorisation, professional experience or a capacity specified by a legal or regulatory standard. A prerequisite may not be discriminatory with regard to age or gender, for example. A prerequisite must also be consistent with the purpose of the qualification and its potential position within the national qualifications framework.

Graduating class

In the context of the application for registration with the RNCP, the term “graduating class” refers to a group of candidates who obtain the same qualification or proposed qualification within a given period of at least one year, regardless of the type of training pathway involved; this definition thus enables France compétences to examine how well the positions held by these individuals match their intended occupations, as well as the impact of the professional qualification in terms of facilitating access to or return to employment.

Job standards framework

The job standards framework describes the professional duties that are characteristic of a particular job profile, bearing in mind that such duties constitute the basic coherent units of tasks (or sequences of tasks) designed to achieve a specific purpose.

Competencies framework

The competencies framework contains a list of all professional competencies based on an analysis of existing jobs listed in the job standards framework and specifies the required levels of proficiency.

Evaluation framework

In the case of each qualification, the evaluation framework sets out what will be evaluated and by what means. It indicates the situations in which the competencies and, potentially, any associated knowledge may be assessed by means of the evaluation methods, as well as the criteria to be met or the levels to be reached in order to determine the performance of the candidate based on the observable outcomes.

Validation of prior learning (VAE)

The validation of prior learning (VAE) is a pathway that allows the candidate to have his or her prior experience validated in order to obtain a professional qualification. It is a legal obligation for ministries and certifying bodies and is also a condition for registration in the RNCP.

Pathways

Ways in which people may qualify to take the evaluation tests required for obtaining a professional qualification. These pathways may consist of an initial or continuing training course, whether work-linked or not, in preparation for taking part in evaluation tests (training leading to a qualification), recognition of the candidate's prior experience or permission to take evaluation tests as a so-called "independent" candidate. The choice of pathways to qualification is a matter for the certifying body to decide in accordance with the general provisions of the Labour Code, or with specific regulations relating to the profession or domain for which the qualification is intended.



6 rue du Général Audran
92400 Courbevoie
+33 (0)1 81 69 01 40

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www.francecompetences.fr