



ROYAL NORWEGIAN MINISTRY OF
EDUCATION AND RESEARCH

European Commission
Directorate General for Education and Culture
A3 - Skills and qualifications Strategies; Multilingualism policy
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Your ref

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Date:

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11.04.14

Response to the consultation on the European Area of Skills and Qualifications

Dear Madam/Sir,

Reference is made to the consultation launched by DG Education and Culture 17th of December 2013.

The Norwegian Ministry of Education and Research welcomes the possibility to give feedback to the consultation on the European Area of Skills and Qualifications (EASQ).

The Ministry's response is partly based on input from the social partners and other relevant organisations at a stakeholder thematic meeting 11th March 2014.

General comments

The EU tools have been established with the aim of facilitating cooperation through the transparency and recognition of qualifications and skills, and we consider these tools important for mobility within education and labour market. Norway takes full part in the European cooperation on implementing these instruments through active participation in the open method of coordination within the Education and Training 2020 strategic framework. Also recommendations on the European Qualifications Framework (EQF), the European Credit system for Vocational Education and Training (ECVET), the European Quality Assurance in Vocational Education and training (EQAVET), Europass and the Key Competences for Lifelong Learning are incorporated into the EEA agreement under protocol

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31 with the aim to strengthen cooperation within the framework of the recommendations.

Several steps have been undertaken; however, a lot of work also remains to be done to implement the tools and also to create more coherence between them at national and European levels. More needs to be done to develop coherence and synergies between the EU level tools and also with the tools developed and used within the Bologna process: The Framework for Qualifications for the European Education Area (QF-EHEA), the European Credit Transfer and Accumulation System (ECTS), the European Standards and Guidelines (ESG) and the Diploma Supplement. However, it is important to keep in mind that such processes take time. Notable examples in this respect are the development and use of learning outcomes in education and training systems and the validation of non-formal and informal learning. Rather than introducing new initiatives, the focus should now be on speeding up the implementation of existing tools and on exploring synergies and possible simplifications and communication between them.

We would also like to mention that the directive on regulated professions, Directive 2005/36/EF now modernised by Directive 2013/55/EU, plays a positive role in recognising professional qualifications and facilitating labour mobility in Europe.

State of play in Norway

The Bologna tools are almost fully implemented: The higher education institutions had to complete the development of learning outcomes for all courses and programmes, and in line with national descriptors, by the end of 2012. The system has been credit-based for decades (first introduced in the 1970s, nationally implemented in the 1980s), and in 2003, the number of credits per year for fulltime studies was changed from 20 to 60 to ensure easier ECTS compatibility. Our quality assurance agency, NOKUT, was established in 2003 as part of a reform of higher education to implement Bologna requirement, and national policy has integrated the requirements of the ESG since the beginning of Bologna Process. We are also ready to implement foreseen changes in the ESG as a consequence of the Bucharest ministerial conference.

The Norwegian National Qualifications Framework for Lifelong Learning, covering all qualifications in the formal education and training system, was adopted by the Ministry of Education and Research on the 15th December 2011. It has not yet been referenced to the EQF, and there is not yet any decision on how the EQF levels should be indicated in relevant documents or by use of other tools. The level descriptors in the National Qualifications Framework are used as a reference when developing learning outcomes in formal programs for all levels of education and training. In any case, the qualifications framework has not been in use long enough for us to know whether it is a success or not. To find out more, the Ministry of Education and Research is planning a study on the practical implementation of the national qualifications framework in higher education this year.

As for the implementation of ECVET, the Norwegian Directorate of Education and Training (executive agency for the Ministry of Education and Research) is in the process of assessing

impacts and developing models for a possible implementation of ECVET in Norway. The deadline for reporting to the Ministry is the 1st December 2014.

However, it is already understood that the ECVET system depends on a great amount of work on the European level to develop and test alternative solutions that can be applied by several countries, not only bilaterally. The focus on bilateral partnership agreements only, may risk reducing the wider scope of the European cooperation in the long run.

Norway is currently devising a framework for quality assessment in VET which makes use of the EQAVET Framework. The project is led by the Directorate for Education and Training. The social partners (employers, employees and learners and providers organisations) are engaged through their participation in a reference group and in a steering committee for the project. A proposal for indicators for quality assessment in VET has been developed and the list of indicators provided in the recommendation has been used as a toolbox in this respect. The proposal has been submitted to consultation amongst stakeholders and will be submitted to the Ministry of Education and Research in 2014.

In Norway, the Europass framework has been used to document skills and qualifications since 2005. The Europass CV and Language Passport is used moderately but has steadily increased from year to year. In 2011, the Norwegian Europass Certificate Supplement (ECS) was revised with new learning outcome descriptions for all 189 vocational certificates. The same year, a new technical solution for the presentation of the ECS in a more accessible and user-friendly format was launched. This has resulted in a significant increase in the use of the ECS. The Europass Mobility document is used moderately. The limited use probably relates to the technical structure which is designed to document formal learning experiences. To secure the overall coherence of the EU tools it should be ensured that the Europass framework is equipped with sufficient flexibility to be able to facilitate the transparency and recognition of a wide range of skills and qualifications. Since spring 2002, Diploma Supplement is issued to all who obtain a final diploma from higher education. Europass Diploma Supplement apply ECTS and is the only Europass document in Norway which is integrated with a related European mobility tool.

Specific comments

Synergies between quality assurance arrangements (ESG and EQAVET) and credit systems (ECTS and ECVET)

Regarding the further development of recognition and transparency measures, we agree that the transparency of tools is important for the further promotion of mobility in the context of education, training and work. The question is how this best could be obtained. In our view, the present system of sector-specific tools is an asset. Quality assurance, for example, must be done differently in primary schools, vocational training and higher education, because of the variation in the nature of the education and training provided, the age of learners and the types of learning sought for. For instance, it is precisely the fact that the European Standards and Guidelines are developed specifically for higher education and by higher education

stakeholders that make them functional across borders. Also, the ESG have been decided upon by the ministers responsible for higher education in the Bologna Process.

The argument about level specificity can also be used for translation tools for credits obtained in other countries. The success of ECTS stems from the fact that it was originally developed by academics involved in international student mobility who wanted a better tool to facilitate their work. In addition the system has been further developed so as to take into account later developments in international higher education cooperation, such as the introduction of European and national qualifications frameworks and the use of learning outcomes. Those involved in international mobility in vocational training have different needs and therefore need different tools. A merging of tools would in our view lead to confusion rather than transparency and might reduce rather than encourage trust in the system. For instance, if institutions other than those providing higher education started awarding ECTS, universities receiving students from abroad would most probably implement a stricter or more detailed regime of control of incoming students' background than if they can trust that ECTS actually means higher education.

It is not the name of a given tool that promotes mobility, but the real content of education and training and the learning outcomes that are in it, as well as honest, well structured and open information. In other words, a tool spanning too many levels of education and/or training might easily be void of real content and thus complicate rather than facilitate transparency and mobility. However, to promote mobility and a smooth transition between levels and countries, it is also important that the tools for the various levels are compatible in aspects that are not sector specific. Should one want to extend tools that have been adopted and function well for one specific level of education or training to other levels, it is essential that a sufficient testing and piloting period precedes any formal adoption, so as to ensure that it is workable and relevant also for the new level(s) in question.

Overcoming skills mismatches

Access to education and training for all, including guidance and counselling on learning opportunities and career perspectives, is crucial for a better functioning European labour market. The inclusion of transversal skills and key competences in all education and training is also of great importance. Rather than investing time and money in building huge databases like the European Classification of Skills/Competences, Qualifications and Occupations (ESCO), where there is no possibility of national quality input and control, and in developing definitions and classifications of occupations in Europe, the focus should be on improvements in education and training systems that will address the general needs of the labour market. In addition, guidance and counselling close to the learners and those looking for a job should be prioritised.

As there is no legal basis for ESCO in the EU legislation and no national endorsement and hence no sustainable source of financing and maintenance, it does not seem very likely that ESCO can become successful as a job matching tool. Also the ESCO linguistic concept might

be more confusing than helpful for the EU tools and initiatives for transparency and recognition of skills and qualifications within education and training.

Resources should be used on improving counselling at all levels of education and training, career guidance and validation and recognition of non-formal and informal learning. Skills forecasts also play a tremendous role in providing information on the developments and trends in the labour market both to individuals and businesses.

Yours sincerely,

Eivind Heder
Director General

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Senior Adviser

This document has been signed electronically.