



Response of the Assembly of European Regions

To the European Commission Consultation on ECVET

Strasbourg, 30th March 2007

1. Background

The European Union is currently preparing a European Credit (Transfer) System for Vocational Education and Training (ECVET), which will be used on a voluntary basis. It aims at facilitating mobility in Vocational Education and Training, which will allow young people to transfer learning results from one country to another in concordance with national regulations. Modern and innovative VET is a key element for employment, social inclusion and competitiveness of the EU and must meet the needs of the citizen, the labour market and society. In a globalising world a future-oriented vocational training increasingly requires the integration of European and international aspects. The implementation of cross border exchange programmes and transnational courses in the field of vocational training would therefore be an excellent opportunity to meet the new challenges.

2. Position of the AER

The AER welcomes the new measures undertaken by the Commission to support mobility in the area of vocational training and education. Europe can build on a rich tradition of VET systems and structures, which have grown over time. We are aware that it is not easy today to transfer one's working experience from one vocational system to another. Appropriate and transparent instruments have to be found in order to ensure mobility.

The project of the European Credit System for Vocational Education and Training (ECVET) is an excellent initiative to facilitate mobility, transfer, validation and recognition of learning results and qualifications from one country to another.

The AER, as a regional organisation with the vocation to develop interregional cooperation at the service of citizens, considers that the ECVET is significant initiative for the regions in entire Europe.

First of all, education and formation are the important fields of regional cooperation supported by the AER, because they are important sources of prosperity. To facilitating this cooperation, the ARE considers that the ECVET is very useful in the development of the regional relations and it aims to assure the economic prosperity in the future.

It could be a key element for the solution the problems of the labour market and society. This new European system is also conformed to the policy of mobility and migration between the regions, which is supported by the ARE. In the same time the principle of the cultural diversity and heritage subsist.

The cooperation in the field of vocational education and training between the regions would be reinforced and the AER could play an important role in the implementation of this system in

the regions. In each region there may be a very large number of different bodies and actors involved. The AER could play a significant role in implementing this system by facilitating the establishments of partnerships or learning agreements between the regions for example. Afterward, the existences of the system will certainly ameliorate the regional cooperation, what is a big advantage for the regions in the terms of quality of life.

The AER supports the ECVET in its purpose, technical basis and measures for supporting the implementation and development of the system. In the same time it is important also for the EU to take into consideration the regions from outside the European Union.

However, it has to be ensured that this diverse culture and heritage of vocational education and training is been kept alive. Standardisation and the loosing of quality in vocational training are therefore the two most important aspects, which need to be avoided.

In addition, the AER would also like to raise attention to several issues that have not apparently been addressed sufficiently in the consultation:

- a) Migrants who received their vocational training outside Europe
- b) Staff training for the implementation of the ECVET
- c) The current system of vocational educational/ training and qualifications is complex. For employers and those involved in the delivery of VET to have confidence in a transfer system will require those to be responsible for the content and accreditation of awards to agree how learning, skills and in particular formal qualifications can be transferred. Reliance on a voluntary system would not overcome this problem.
- d) The consultation paper does not address the need to develop employer understanding. Mobility and employability of workers is reliant on employers recognizing prior skills, knowledge and qualifications.

3. AER Responses to the specific Questions of the Consultation

a) 4.2.1. The purpose of and reasons for an ECVET system

European Commission:

– Are the most important objectives and functions of a European system of credits for vocational training and education and the role of competent authorities fully outlined in the consultation document? If not, what is missing?

AER response:

The most important objectives of ECVET, the mobility of people undertaking training, the validation of the outcomes of lifelong learning, the transparency of qualification as well as the mutual trust and cooperation between vocational training and education providers in Europe, are outlined sufficiently.

However, more information could be given to the role and position of the so-called competent bodies.

In addition, it has to be ensured as well that there will not be a strong increase in additional bureaucratic procedures and additional financial burden for local and regional authorities. The system should remain simple enough and user-friendly for the staff administering it.

In addition, a lack of sufficient knowledge of the respective personal validating and qualifying the learning outcomes would also impede the successful implementation of the ECVET.

European Commission

– *What would be the main added value of the planned ECVET system?*

The main added value would be the factor of increased mobility, which in turn would lead to knowledge exchange, intercultural competence and dialogue, adjustment to the needs of the labour market. It would thus contribute to economic growth and the European integration.

Especially, the mobility of young graduates will be significantly increased, not only for university students where mobility is currently less of a problem but also for other forms of non-university education. The system would also facilitate the vocational training of staff in other European countries.

The regions of Europe would hope that the ECVET will increase the mobility and the entrepreneurship of their citizens and that it will also contribute to their regional development in the long run.

b) 4.2.2. The technical basis for ECVET

European Commission

– *Do some technical specifications need to be set out in greater detail with a view to the practical implementation of ECVET? If so, which ones?*

– *Do ECVET's technical specifications take sufficient account of the:*

- *evaluation,*
- *validation,*
- *recognition,*
- *accumulation,*
- *transfer*

of learning outcomes whether formal, non-formal or informal? If not, please give details.

AER response:

It is not sufficiently outlined how an informal learning context can be assessed adequately, . A point should be made to avoid unnecessary red tape and complicated structure, but the technical specifications appear to be too complex and not clear enough for an easy understanding for the people that will have to administer in the future in the regions.

c) 4.2.3. Implementing ECVET

European Commission

– *Under what conditions could describing qualifications in terms of learning outcomes and expressing them in units effectively improve the transparency of qualifications and contribute to the development of mutual trust?*

AER response:

It has to be clarified whether describing qualifications in terms of learning outcomes only is the best way to relate to vocational training. If concentrating only on outcomes, content, place and methods lose their importance. In-put and process – orientation has to be included into the describing of qualification.

European Commission

– Are there any features in your qualifications system, which would favour the introduction of ECVET? What constraints, if any, do you foresee?

AER response:

The AER has a long experience in working with the diversity of European regions. Therefore, it is fully aware of the difficulties, a European-wide qualifications system would involve. As a result, ECVET should take account of the sometimes big differences on the national and regional level, when it comes to the assessment of qualifications.

European Commission

– How and within what timeframe (launch, introduction, experimentation, widespread introduction) could ECVET be implemented in your country?

AER response:

However, another experimentation period would seem reasonable in order to see how more traditional vocations correspond to the new system. The experimentation should be supervised on EU-level and take account of the diversity in Europe.

d) 4.2.4. Measures for supporting the implementation and development of ECVET

European Commission

– What kind of measures should be taken at European national and sectoral levels to facilitate the implementation of ECVET?

AER response:

The European regions are one of the main players in the field of vocational training. Being closest to the citizens in the territory and being responsible for its economic development policies, regions are able to be reliable facilitators for the implementation of ECVET.

European Commission

– What documents, manuals and guides could be developed to facilitate the implementation of ECVET?

AER response:

A model memorandum of understanding should be developed at European level as suggested also by the Commission.

A guide explaining the description and evaluation of the translation of skills into units and then into credit points would be appropriate. The guide should be specifically addressed to the

regional governments, which would be able to function as crucial multipliers of information regarding the ECVET.

A glossary seems vital for ensuring that everybody has the same understanding of specific terms. (It has been provided already)

e) 4.2.5. ECVET's potential for enhancing mobility

European Commission

– To what extent and how do you think that ECVET and Europass could complement each other to enhance mobility?

AER response:

The AER sees the possibility of ECVET and Europass complementing each other, but this should be discussed in detail on the European as well as on the national level.

It seems appropriate to create a Europass supplement on the degree in vocational education and training such as exists already for higher education.

Strasbourg, 30th March 2007

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