

Austria's Position on the Framework of the Consultation Process on the European Credit Transfer System for VET (ECVET) – The Main Statements Made in the Austrian Consultation Process: Summary and 8 Core Hypotheses.

Translation from the German original position paper, which shall be binding.

The consultation process in Austria

In Austria, an open and democratic consultation process was conducted, involving all stakeholders in VET (ministries, social partners, provincial authorities, schools and other VET institutions). On as early as 26 September 2006, an information event was held at the Austrian Chamber of Labour, at which occasion the initiative was presented to a wider Austrian public for the first time and which attracted many visitors.

On 17 November, the official consultation document was dispatched to a large number of Austrian VET actors.

A total of 28 organisations have so far submitted their positions, which is more than in the previous consultation procedure on the EQF.

A consortium of scientists was commissioned to conduct an analysis and systematic evaluation of these positions. This analysis, which also takes diverging positions into account, forms part of the national position and has been appended as Appendix 1.

The key messages derived from the Austrian consultation process have been summarised by the Federal Ministry for Education, the Arts and Culture based on eight core hypotheses. Austria requests the European Commission to take these hypotheses into account when rephrasing its proposal regarding a recommendation for ECVET, elaborated for the codecision procedure by the European Council and the European Parliament.

Summary

The Austrian consultation process revealed that the planned recommendation meets with broad support; there was not a single rejection of ECVET for reasons of principle in the 28 positions submitted. ECVET's benefit of serving as an instrument to enhance mobility between EU member states was seen as its prime objective in this context.

Eight core hypotheses

1. Subsidiarity principle

ECVET should strictly adhere to the principle of subsidiarity as applicable to the fields of education and VET (Articles 149 and 150 of the Treaty establishing the European Community) and must not exert any direct influence on the member states' education systems. ECVET cannot and should not lead to any fragmentation of VET systems. Austria in particular has a well-developed system of initial vocational education and training (IVET) that is accepted both by society and the labour market and additionally shows very high participation rates. The Austrian VET system aims to ensure provision of comprehensive and complete training to enable graduates to exercise a profession in a qualified manner in the labour market and qualify them for lifelong learning. It additionally promotes the individual's personal development and ability to integrate himself/herself into society to a high degree. For that reason, it teaches not only the required occupation-related knowledge, skills and all-embracing competences but also general education content and important key skills in an integrated manner.

This approach pursued by the Austrian VET system, which goes beyond mere VET, should be considered and supported by introducing ECVET.

2. ECVET's objective

ECVET's main objective is to contribute towards enhancement of EU-wide mobility during VET by facilitating the recognition of periods of training completed in another member state. ECVET should contribute towards enabling the recognition of periods of training on the basis of a uniform system with joint principles and a common terminology in all member states, among all stakeholders and affected parties. Any possibilities of application that go beyond that scope, such as increasing vertical and horizontal permeability of education systems at the national level – though feasible and desirable –, however, should be provided on a voluntary basis in the member states by the competent bodies and should by no means be a subject of the ECVET recommendation. Consequently, the ECVET recommendation should be worded clearly and concisely in every respect. This is of imminent importance also because it would otherwise create expectations that cannot be met by ECVET and would lead to disappointments.

3. The 'tool box' character of ECVET and the role of the memoranda of understanding

ECVET is a tool box offered to potential interested people, the application of which pursues a bottom-up approach and is voluntary, however.

The key element here is the memorandum of understanding between the competent bodies and training institutions. ECVET will only unfold its binding and mandatory effect between these partners involved in the memoranda.

This central role of the memoranda of understanding still has to be elaborated more clearly and precisely. The recommendation should by no means make the impression that ECVET is a generally applicable credit transfer system. Responses expressed in the Austrian consultation process reveal that the document is misunderstood in this regard; therefore a more unambiguous wording is indicated.

Due to this feedback provided in the consultation process, Austria consequently requests an explanation of the structuring of the memoranda of understanding in greater detail by using guidelines and examples of good practice. These explanations need not necessarily form part of the recommendation itself but can also be offered as separate manuals to ECVET users.

4. Allocation of credit points

In this area, the greatest need for clarification has been identified. The description of criteria for the allocation of credit points has been rated as **insufficient**. The document leaves open whether the allocation of credit points should primarily take into account the learning outcomes or the learning process. The relationship between the credit points and the NQF and EQF levels is not clear, either. The Austrian institutions agree in that the **orientation** towards **learning outcomes must** be most important for application. The time element might be taken into account merely in the determination of the overall number of credit points; the distribution of the overall number of credit points that has been determined in that way over the units (knowledge, skills, competences) should only be outcome-oriented, however. Consequently Austria requests, at least in the first stage of implementation, the necessary **flexibility framework**, as described above, that allows the different systems and users to apply ECVET in accordance with their requirements and needs.

At any rate, there is still some need for clarification and coordination at the European level in this respect. A working group involving existing pilot projects and the ECVET expert group should perform conceptual tasks for that purpose.

5. Timeframe

When introducing ECVET it should be taken into consideration that the essentials of the EQF need to be defined beforehand and national qualifications are allocated to the European levels. Consequently, ECVET can be tested in the beginning only within the framework of pilot projects. These can be used to further develop the system and build up knowledge and know-how at all levels (EU, member states, sectors, individual VET actors, etc.).

These experiences can be used to further develop ECVET. It is therefore proposed that ECVET be evaluated after a few years (e.g. after five years) and that then an extended version be adopted that has been adapted to the results of the evaluation.

6. Recognition of informal and non-formal learning

The document rightly emphasises the importance of these two forms of learning, but it does not provide sufficient indications on how they can be taken into account within the framework of ECVET. Therefore many VET actors expressed their wish that more concrete procedures and methods be developed. It was also agreed that, in the first pilot stage, ECVET should, from a realistic perspective, be implemented and tested primarily in the formal IVET system.

7. Relationship between ECTS and ECVET

The Commission's approach, which consists in not combining ECVET – which is currently being elaborated – and ECTS, seems to be the right approach for the time being. Consequently, allocating 120 credit points for every year in full-time VET (independent of whether it is school-based or in the dual system) can be agreed to as a rough yardstick.

It is important, however, that the learning outcomes (knowledge, skills and competences) serve as main allocation criterion and that the time component should not be excluded as an option to facilitate allocation.

On the one hand, these 120 points differentiate ECVET from ECTS; on the other hand, conversion to 60 points would easily be possible. In the medium-term (once ECVET has been established in Europe), however, the systems should be merged. This objective should be included in the recommendation.

In VET paths that are located at different levels in the individual member states, the differentiation between ECVET and ECTS might be problematic. In Austria, for example, training for nurses is located at secondary level II, whereas in other countries it is part of the tertiary level, with the bachelor's degree awarded to graduates. The equivalence of these VET paths was clearly laid down in the Annex to the EU Directive on the recognition of professional qualifications, pursuant to which Annex Austrian

nurses are entitled to access to exercise relevant occupations in other member states. For these cases it would be worth considering laying down exception provisions or special rules to facilitate the application of ECVET and ECTS nonetheless. Regarding the problems connected with the field of the health care professions, reference is made to the detailed positions by the competent Austrian bodies and VET establishments (Federal Ministry for Health and Women's Issues; Vienna School for Health Care and Nursing; Vienna Hospital Association – General Directorate; Training Centre for Nursing West, Innsbruck) in the Appendix.

8. Support measures to introduce and further develop ECVET

a) Austria calls for the drawing up of guidelines for ECVET users with answers to the following questions:

How are knowledge, skills and competences described?

How are the units defined? What are the criteria on which points are allocated?

These guidelines should include some **practical examples** to illustrate the above-mentioned questions and answers.

b) Austria proposes that the Commission acts as an ECVET service unit, which informs about ECVET (information campaigns) and answers queries. Furthermore, the Commission should network various national ECVET initiatives at a European level.

c) The application of ECVET should serve as a selection criterion in the new lifelong learning program in the field of mobility. In longer-term exchange measures, the application of ECVET should become a binding criterion to enhance mobility in VET.

d) Also at the level of member states, competent institutions should provide information about ECVET and answer queries about ECVET. These institutions should be networked at a European level. Financial support within the framework of programs of the European Union would be welcome.

Vienna, on 24 March 2007

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Appendices (in German only)

- Analyse der Stellungnahmen zum Entwurf der Europäischen Kommission über ein Europäisches Kreditpunktesystem (ECVET) (Analysis of positions regarding the European Commission's draft regarding a European Credit Transfer System for VET - ECVET)
- Übersicht zu den eingelangten Stellungnahmen (Overview of submitted positions)
- 28 individual positions as zip file attached

