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BUSINESSEUROPE POSITION ON THE COMMISSION CONSULTATION ON A EUROPEAN CREDIT SYSTEM FOR VOCATIONAL EDUCATION AND TRAINING (ECVET)

EXECUTIVE SUMMARY

European cooperation on education and training has to be examined in the broader economic and labour market context. Growth is improving (+ 2.9% in 2006). The employment situation is also picking up (7m jobs to be created in 2006 – 2008). However, most of Europe seems to be trapped in a negative trade off between job creation and productivity growth which threatens to undermine the sustainability of these economic growth and employment improvements.

To be successful, Europe needs:

1. to better anticipate and respond to change,
2. a mobile workforce with broad skills,
3. transparent and comparable qualifications.

The proposed ECVET system aims at promoting transparency and facilitating mobility, two objectives strongly supported by BUSINESSEUROPE.

The key criteria to assess the merits of ECVET will be the same as for the other existing education and training tools developed at the EU level, namely:

1. Can it contribute to improving the functioning of labour markets?
2. Will it facilitate the development of lifelong learning?
3. Will it lead to unnecessary bureaucracy?

It is furthermore vital that ECVET is fully compatible with the European Qualification Framework (EQF) and that it helps in better aligning education systems to the labour market needs. ECVET should also be compatible with the European Credit Transfer and Accumulation System (ECTS) for higher education. BUSINESSEUROPE supports the voluntary character the ECVET system and its focus on a learning outcomes approach. However, we are concerned that it is unnecessarily complex and will lead to practical implementation problems.

The current proposal tries to achieve many different things in one go. BUSINESSEUROPE advocates a step-by-step approach. The first phase of ECVET should be to develop and apply the Memoranda of Understanding. It is only after an adequate testing phase and further studies that one would then be able to assess whether and to what degree further mechanisms can be developed. In any event, any fully fledged system must be based on the description of learning outcomes as established by the EQF.



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Introduction

1. The European Commission has launched a public consultation for the establishment of a European Credit System for Vocational Education and Training (ECVET) aimed at enhancing mobility, transparency and mutual trust in the quality of Vocational Education and Training (VET).
2. The main features of the proposal can be summarised as follows:
 - The aim is to have a common EU system enabling the transfer, accumulation, validation and recognition of learning outcomes that are acquired abroad.
 - ECVET would apply to all learning contexts, whether they be formal, non-formal or informal.
 - Application of ECVET would be on a voluntary basis.
3. The proposed ECVET system is based on four elements:
 - Description of learning outcomes in the form of knowledge, skills and competences,
 - Validation and recognition of learning outcomes,
 - Subdivision of vocational qualifications into units, which are described in terms of learning outcomes,
 - Allocation of credit points

The relative value of a unit would be measured by allocating credit points to it which could be recorded in different countries with an indicative total number of credit points per qualification of 120 per year of study.

The Broader labour market context

4. European cooperation on education and training has to be examined in the broader economic and labour market context. Growth is improving (+ 2.9% in 2006). The employment situation is also picking up (7m jobs to be created in 2006 – 2008). However, most of Europe seems to be trapped in a negative trade off between job creation and productivity growth which threatens to undermine the sustainability of these economic growth and employment improvements.
5. To be successful, Europe needs:



- to better anticipate and respond to change,
- a mobile workforce with broad skills,
- transparent and comparable qualifications.

On ECVET and the existing European tools

6. Over the years, several education and training tools aimed at facilitating mobility and transparency have been developed:
 - The European CV gives a comprehensive standardised overview of education attainments and work experience of an individual, thus facilitating candidate applications across EU borders. The European CV is considered a useful mechanism for assessing European-wide applicants' competences notably as it also covers informal and non-formal learning and can be accompanied by the Certificate Supplement (for vocational training) and Diploma Supplement (for higher education).
 - The EQF provides a mechanism to enhance the comparability of qualifications across countries after training has been undertaken and focuses on a learning outcomes approach. It has already prompted the development of National Qualification Frameworks (NQF) in several Member States.
 - The ECTS makes study programmes readable and comparable and thus facilitates mobility and academic recognition. The allocation of credit points is based on the student workload required to achieve the objectives of the programme, which are expressed in terms of learning outcomes. A key challenge will be to make ECVET, EQF and ECTS compatible and interoperable. In the long term the focus must be on a common output-oriented system which promotes the transferability between VET and higher education.
7. The merits of the proposed ECVET system have to be assessed in the context of the existing EU-level tools to see if it can bring real added value and would be compatible with the other mechanisms.
8. ECVET could usefully complement the EQF if it permits the recording of competences acquired by experience or during training (before obtaining a qualification). Therefore, the key for the future development of European tools is ensuring the coherence between EQF and ECVET.
9. Apart from enhancing mobility, ECVET could also promote the permeability between VET and higher education provided the two systems are made compatible to each other.

On the aims



10. BUSINESSEUROPE supports the objective of ensuring that learning outcomes acquired abroad can be taken into consideration for a learner's pathway in their country of origin, thus encouraging mobility in VET.
11. BUSINESSEUROPE supports the voluntary application of an ECVET system.
12. BUSINESSEUROPE also agrees that mutual trust and cooperation in ensuring the quality of VET provision can be improved in Europe, and that focusing on learning outcomes can contribute in enhancing transparency across and between systems.
13. However, European employers are concerned that the present ECVET proposal is unnecessarily complex and tries to achieve too many different things in one go.

On compatibility with the EQF

14. The advantage of the EQF is that it represents a translation grid from which national and / or sectoral frameworks can align their respective 'grids' to the EQF reference levels. It remains an exercise of enhancing the comparability of qualifications – with the indirect goal of improving transparency and mobility – which does not require an overhaul of national qualification systems. The ECVET system must follow the same logic.
15. In line with the EQF, the ECVET must also focus on learning outcomes if it is to be useful for employers.
16. Furthermore, very diverse education and training systems exist across and within Member States. It is still early days in the implementation of EQF and development of NQFs. Not all VET qualifications are currently based on learning outcomes. More time is therefore necessary for EQF to develop before introducing a fully fledged ECVET.

On credit points

17. European employers have doubts over the feasibility of a common European ECVET system based on the allocation of credit points at this stage:
18. Firstly, this is due to the practical difficulties associated with the application in and within national systems with the administrative and bureaucratic burdens this would engender. This approach would notably impose unnecessary bureaucratic burdens to companies, especially those that act as training providers.
19. Secondly, European employers are concerned that the proposed system is too ambitious in its rationale of being able to attribute credit points to all learning outcomes in concrete and consistent terms across countries, whether through formal, non-formal, and informal learning pathways. It is difficult to ascertain how all different learning outcomes can be formulated as credit points within units, which instead pertain to formal qualifications. BUSINESSEUROPE believes that



proposed ECVET structure does not reflect the reality of the very diverse forms of learning provision in VET across and within Member States.

20. Thirdly, the coexistence in Europe of companies that act as formal training providers and of those that do not implies an inconsistent and imbalanced application of ECVET across workplaces.
21. Lastly, the proposal that credit points can be used as a reference to real or notional length of programmes (i.e. 120 points per year) could be problematic as it could threaten to undermine the focus on learning outcomes and compatibility with the EQF. Learning outcomes should remain the focus of ECVET in the longer term.

Alternative proposal

22. As a result of the above-mentioned reservations put forward by European employers, BUSINESSEUROPE proposes that an appropriate tool to record and transfer learning outcomes from one country to another should restrict itself at this stage to a Memorandum of Understanding (MoU) between the respective learning providers which enables to record the experiences gained from a period of mobility based on learning outcomes.
23. Such an initial system would not only reflect the voluntary nature of the implementation of an ECVET system but also grant the respective learning providers the flexibility required to implement the MoU in the short term according to their specificities.
24. The MoU principle should envisage general guidelines on the content but must remain flexible and adaptable in order to reflect the diverse and changing contexts of mobility and labour market needs in the field of VET.
25. This step-by-step approach would also pave the way to develop in the longer term the appropriate mechanisms that permit different learning pathways to be recorded for the learner. Furthermore it could ensure compatibility with the ECTS.
26. The advantages of such a MoU would notably permit the recording of learning outcomes for many SMEs that are not formally learning providers.

Conclusion

27. BUSINESSEUROPE supports the objectives of the proposed ECVET system but has doubts about its present modalities and therefore proposes an initial system based on a MoU.
28. The application of the MoU should be accompanied with a long testing phase which puts the emphasis on sectoral approaches. This would ensure that training organisations and certification bodies have the possibility to experiment different mechanisms that can be applied for their needs.



29. This testing phase can also apply to the development of validation mechanisms for non-formal and informal learning, to establish more clearly where and how this can fit into the ECVET system.
30. Once the MoU and accompanying testing processes are underway, their progress can be reviewed after 2010 so that in the longer term the appropriate tools can be developed thereof.
