

**COMMISSION CONSULTATION ON ECVET**  
**European Credit system for Vocational Education and Training**

**CEEMET POSITION**

*CEEMET represents the interests of employers' organisations in the metal, engineering and technology-based industries from 21 countries with a particular focus on social policy issues. Our member organisations currently represent around 200,000 companies, employing some 12,5 million people.*

CEEMET acknowledges the Commission's consultation document aiming at establishing a **European Credit system for Vocational Education and Training" (ECVET)**.

Before entering into detailed comments, CEEMET would like to underline that transparency and comparability of occupational qualifications and skills are important tools for increasing the geographical and occupational mobility of workers, both at national and EU level. They contribute to releasing the full potential of the free movement of workers and the free provision of services. This is in the interest of both, employees and companies. Employees may show their capacities and skills, and employers have access to qualification profiles of individual persons.

CEEMET shares the view of the European Commission that any tool to improve transparency of occupational professions should be voluntary and based on the principle of **respect of the variety of the educational systems**.

Recalling that **ECVET addresses only learning processes** and is **not a tool to be of immediate use at company level**, CEEMET would like to give the following replies to the questions raised in the consultation document.

***The purpose of and reasons for an ECVET system***

The most important objectives and functions of ECVET is to allow individuals to have learning outcomes acquired abroad taken into consideration for the purposes of issuing a qualification in its country of origin, the "learning outcomes" being acquired through formal, informal or non-formal learning processes.

CEEMET welcomes the "**learning outcomes**" approach which is essential for companies and necessary to make **ECVET compatible with EQF**. In order to keep the doors open between VET and higher education, it is crucial that "the learning outcomes" approach apply at all levels of the education and vocational systems.

If the theoretical objectives and function of the ECVET system are fully outlined, the variety of training situations/actors/competent authorities that could be involved make it impossible to have a clear view of its concrete implementation. Some **guidelines ensuring a minimum content of the MoU** and thus the quality of trainings may be necessary.

The **concrete result of the ECVET will depend very much on the way it will be implemented** and on the agreed “memoranda”. In a positive scenario, it could help to better link the educational system to the Labour market and to create pathways between vocational training and higher education. In a negative scenario, it would create rigid boxes with criteria/definition of qualifications and prevent the necessary flexibility of the educational/training systems. Indeed **flexibility** and **adaptability** are important preconditions to put occupational vocational systems and skills profiles in a position to cope with ever faster changing demands of production methods and qualification needs.

### *The technical basis for ECVET*

The ECVET concept described in the consultation document raises many questions on its feasibility. For example, it implies a partnership (MoU) between “**competent authorities**”. The extent, the attitude and the procedures of validation show huge differences from country to country. These differences somewhat correspond to the huge differences that exist between national, vocational and further training schemes. In some countries validation is carried out only by the employer, in other countries this is done by external assessors, whereas validation may also be carried out by social partners – where felt appropriate in co-operation with public authorities.

On one hand, the variety of situations imposes flexibility in the concept but on the other hand some coherence must be ensured to **guarantee quality** in all steps of the system (training, evaluation, validation, recognition).

To make the ECVET system coherent and compatible with other instruments at European level (ex: **EQF**), **it is important that it is exclusively “learning outcome” based** and that it does not include “time based” references. In the consultation document, the Commission describes the credits by “...reference to a real or notional average length of programme; real or notional learner workload in a formal learning context...” These **time - based references should be excluded**.

**CEEMET does not see a concrete need for the “credit-points”**. They would bring unnecessary complexity in the ECVET. All the details of the transfer, validation, accumulation process will be set in a MoU which should describe the qualification in terms of units and the units in terms of competences, skills and knowledge. In this framework it will be possible to acquire some of the units “abroad”. Adding the concept of credit-points in this scheme would not bring any added-value. It would correspond to an artificial division of the units and would inevitably lead to the use of time-references (which are easier to apply for such an arithmetical criteria).

Furthermore, in CEEMET’s opinion, a **common understanding of the principal technical terms** (qualifications, knowledge, skills, competences) used in the Consultation document among all Parties is an indispensable prerequisite for a sustainable tool. Any such common understanding must, of course, not interfere with national systems or definitions.

The content of the **units** will depend on the training/profession involved. However, they should include minimum information: corresponding content in terms of skills, competences and knowledge, be legible and understandable, conceived and organized in a coherent way, and finally assessable.

In some countries, a modular concept of training is unknown. The creation of a partnership would make a restructuring of the training necessary (in modules/units) through the MoU.

### ***Implementing ECVET***

Learning outcomes, if they are **really assessed**, are more concrete and thus easier to compare than theoretical descriptions based on the duration of a learning process.

The various “**competent authorities**” will have to agree on the allocation criteria of units in the MoU. Expressing the learning outcomes in units would improve the transparency of qualifications under the condition of **coherent allocation criteria** throughout the various implementation examples. In this context, it is important to **avoid time references** (not compatible with EQF). Mutual trust development will depend on the **quality** of the result, in terms of training and of structure.

### ***Measures for supporting the implementation and development of ECVET***

Before supporting and developing ECVET, it is necessary to know what ECVET is and to evaluate the real interest of this scheme. Therefore it is important to define more precisely and to test the tools and the concepts through pilot projects and studies. At national and European level, databases recording the results of these projects (possible partners, existing MoU or models of MoU, validation mechanism, qualifications in terms of units of learning outcomes etc) could be useful.

### ***ECVET's potential for enhancing mobility***

ECVET could be a useful and secure tool for the development of transnational partnerships. This will very much depend on its implementation. It will require better information of the stakeholders and a systematization of the concept at European level, facilitating its use while guaranteeing standards requirements regarding the training, evaluation, validation and recognition's phases.

## **Conclusion**

CEEMET supports the objectives of enhanced mobility and improved transparency of qualifications and welcomes a concept promoting the “learning outcomes” approach.

However considering the number of questions raised by the concrete implementation of ECVET, CEEMET believes it is crucial that beforehand pilot projects and studies on ECVET are conducted and that their results are accessible and thoroughly discussed.

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