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Ministry of Education
The Minister

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Dear Commissioner,

23 APR. 2007

Following your letter of 1 December 2006 regarding developing a European Credit System for Vocational Education and Training (ECVET) I can inform you, that we have had a thorough national consultation on this proposal with all relevant stakeholders, i.e. the social partners, student and teacher organisations, organisations representing the management of the institutions etc.

As you can see from the attached report the idea of developing an ECVET system has broadly been supported.

I am therefore looking forward to receiving the draft Recommendation to the European Parliament and the Council on the ECVET proposal when the Commission has analysed all the reports from the consultation process.

Yours sincerely

Bertel Haarder

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The Danish response to the European Commission's working paper on a European Credit system for Vocational Education and Training (ECVET)

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At the end of 2006 the European Commission launched a consultation process concerning the development of a European Credit system for Vocational Education and Training (ECVET). In this context, the Commission requested the Member States to organise national consultations on the ECVET working paper prepared by the Commission.

On this basis a national consultation process on the ECVET working paper was undertaken, involving a broad range of actors within the field of vocational education and training and adult vocational and continuing training etc. The consultation process included a written response from relevant advisory committees, and a consultation seminar was held with the participation of representatives from the social partners, school and teachers' associations and other ministries, among others.

On the whole, Denmark is very positive concerning the establishment of a European credit system for vocational education and training as a part of the joint efforts for promoting enhanced European cooperation in the area of vocational education and training within the framework of the Copenhagen Process.

The development of a simple, user-friendly European credit system will in particular contribute to facilitating the transfer and recognition of vocational education and training qualifications in the context of cross-border mobility between different vocational education and training systems. Common tools and working methods will provide a significant contribution towards enhancing cooperation and mutual trust between competent bodies, organisations and educational institutions.

From the Danish perspective, special importance is placed on:

- that it be voluntary for countries to make use of a future ECVET instrument,

- that implementing credit point systems in national vocational education systems is not a precondition for using ECVET,
- that implementation of the ECVET principles and methods is to be decided on national level.

Additionally, emphasis is also placed on ECVET being developed in such a way that it does not require changes in national legislation and create obstacles for existing national agreements designed to ensure credit transferability and recognition of Danish students' learning outcomes achieved abroad.

On the basis of the national consultation process in Denmark, the following general comments on the European Commission's working paper concerning ECVET can be stated:

- The objectives of ECVET have been generally positively received and are seen as an important element in the efforts to promote the mobility of those applying for educational programmes and the mutual recognition of qualifications and competencies.
- It is seen as positive that the proposal is based on the recognition of learning outcomes that can be achieved through a variety of learning processes and that it is linked to the proposed European Qualifications Framework (EQF) and is based on the same principles concerning learning outcomes.
- There is general approval for the development of a European credit system and the objectives of ECVET. However, it is thought that the current proposal is too ambitious and too broad in scope. The development of ECVET needs to focus initially on learning outcomes and the transfer of credit for learning related to the vocational students' educational mobility, which could include work placement programmes as well as formal school education.
- There is general agreement that the description of the ECVET proposal is too abstract and difficult to understand. Among other things, there is a lack of specific examples of how ECVET can be implemented, including what functions and responsibilities the various actors would have in, for example, cooperation regarding educational mobility and how, specifically, the "qualification units" and ECVET points can be used as a means of ensuring credit transfer and recognition of learning outcomes.
- As the current proposal is described, it is the general perception that it could lead to a bureaucratic system involving considerable resources. Therefore, it is recommended that ECVET be simplified so as to be made more user-friendly for schools, citizens and enter-

prises, etc., and so that it is made flexible enough to be adjusted to national educational conditions.

Concerning the working paper's technical description of the ECVET proposal, the following should be noted from the consultation process:

- There is general agreement that the description of qualifications in learning outcomes will promote transparency and recognition, and that organisation into units will contribute to promoting mobility and credit transfer. However, it was the opinion from several stakeholders that there is a considerable risk that the method could result in an undesired modularisation and individualisation of vocational education and training programmes. The application of the method should therefore be made clearer, among other things by providing examples of how it can be easily used in a cooperative effort concerning credit transfer between various national vocational education and training systems.
- Regarding the working paper's proposal for a credit point system, the consultation process concluded that there is a need for finding a common method for the distribution of points based on learning outcomes. The proposal contains a number of different approaches, which, among other things, could make cooperation between different educational programmes and actors difficult.
- Moreover, it is recommended that the proposal for using 120 points as the common norm be reconsidered in order to ensure coherence with the ECTS system used in higher education programmes. At the same time, it is suggested that coherence with the ECTS system be made explicit, and it has been proposed that the ECTS system also could be expanded to include vocational education and training, instead of developing a separate system.
- Furthermore, it is recommended that the proposal be expanded to include a specific description of the most important tools for applying ECVET, including, among other things, the suggested model for cooperation (Memorandum of Understanding) and the student agreement (The Learning Agreement).
- Finally, attention is called to the need for clarification as to how ECVET can fit in with and build upon current European instruments such as EUROPASS.

In connection with the implementation of the ECVET proposal, the consultation process resulted in special attention being drawn to the following:

- A better and more clearly described proposal for ECVET is needed as a foundation for introducing a final proposal for a common European instrument. It is recommended that the Member States and social partners be involved in the work of drawing up a revised proposal.
- There is a need for developing simple and clear guidelines for using ECVET and a “toolbox” containing the relevant instruments.
- Additionally, there was a call for the necessity of testing ECVET through development and mobility projects that can contribute to developing examples of best practice and descriptions of methods and instruments.

In conclusion, it should be mentioned that there is general agreement that the establishment of a common credit system will promote mobility and, at the same time, enhance the quality in work placement training and school education for VET- students going abroad. This will contribute to making vocational education and training programmes more attractive to both students and enterprises. It is, however, absolutely essential that the further development and implementation of ECVET be based on concrete and practical transnational educational cooperation between educational institutions and other relevant actors within the field of vocational education and training.