



European  
Association  
of Regional  
and Local  
Authorities  
for Lifelong  
Learning

Ms. Odile Quintin  
Director General – Education and Culture  
European Commission  
Rue de la Loi 200  
1049 Brussels

Brussels, 28 March 2007

**SUBJECT: ECVET Consultation Document**

Dear Ms Quintin,

I am pleased to submit this response to the ECVET consultation document on behalf of the European Association of Regional and Local Authorities for Lifelong Learning (EARLALL).

The Association embraces the goal of improving the mobility and flexibility of learners on their learning and career paths, both between different European educational systems as well as within national systems. We also support the goal of improving the transparency, transferability and multilateral recognition of vocational qualifications and competencies. Accordingly, we see the European Qualifications Framework, ECVET, the Bologna process and Europass as important complementary developments which can help foster the mobility of European citizens and increase the flexibility and compatibility of our education systems.

However, these developments do need to be synchronized in order to avoid duplication of work. We anticipate the need for measured and sustained progress based on careful testing of feasibility and evaluation of results in taking these developments forward; and we feel that EARLALL regions, being drawn from across Europe but acting together, can play a very constructive role in this process.

We would hope to see a fully integrated European credit system embracing all forms of learning in due course, but recognise that this can only be achieved in stages. ECVET should certainly aim to include all forms of vocational learning including work-based training and vocationally-orientated adult learning in community settings. It should be simple in structure and easy to use, both for the individual learners and for the institutions and companies that are expected to award and recognise the credit achieved by the learners; and it will be essential to have a process of validation in place to ensure the credibility and value of the credit awarded. These are important provisos and it will take time to convince stakeholders that they can be fully satisfied.

Consultation Questions:

#### 4.2.1 The aim and purpose of the ECVET system

The four different systems and frameworks in development could be confusing to stakeholders and we would urge that efforts are made to rationalise European systems and frameworks.

We would like to see links to the Higher Education sector and professional bodies. The Commission might consider expanding on the fact that VET may be successfully undertaken at any level including HE and during subsequent professional development and therefore the ECVET concept should be capable of embracing all levels. There is also a need to better clarify the meaning of the concepts of assessment, validation, recognition and competent body'.

The ECVET system will add value by:

- Supporting two-way mobility for learners through the recognition of different member states' qualifications;
- Supporting joint development work in qualifications and sector frameworks;
- Helping to build on trans-national and national partnerships;
- Providing a unified but flexible 'recognition' system.

It is suggested that a process of *unit to qualification*, as developed in Scotland and Wales, be considered for the proposed ECVET system rather than vice versa as seems to be indicated in the consultation document.

The European Qualifications Framework (EQF) should become the overarching reference point for ECVET. However, it is important that it does not override existing national framework structures.

#### 4.2.2 The Technical basis of ECVET

We would like to see more thought given to the issue of quality assurance. There also needs to be a clearer methodology for allocating credit which is consistent and can be flexible enough to be adopted by all national partners. There is little mention of resources likely to be needed by competent authorities who will undertake the process of credit-rating and some guidance on this will be required. It also needs to be recognised that, for many employers, the acquisition of competences rather than the completion of full qualifications may be of most interest; and it is important therefore that the credit system caters for the combining of units of learning to support the development of relevant competences as well as the acquisition of qualifications. It is also very important that credit is awarded for achievement of learning outcomes and not based on time served. In Scotland and Wales the allocation of credit points has been developed on the basis of the reference figure of 1 credit point equalling a notional 10 hours of assessed learning and 120 credit points for 1 full-time year of study within higher education; and this methodology has now been adopted by the whole of the UK as a means of applying credit to learning outcomes for both higher and vocational education and training.

### **4.2.3 Putting ECVET into practice**

As noted above, it is crucial that quality assurance measures are in place and that they are mutually recognised across member states in order to ensure that there is credibility in the system. Credibility will encourage the voluntary uptake of ECVET across Member States. In order to make it work, Member States must want to make it work. The voluntary principle is thus an essential requirement for successful implementation. Partnership between countries and regions which are committed to a credit-based system for mutual reconciliation of their different competence requirements and qualifications arrangements is the way to make progress and other parts of Europe will then wish to follow. This is a field that is well-suited to piloting and 'valorisation' approaches on an inter-regional basis as already demonstrated by the engagement of EARLALL members.

### **4.2.4 Support actions/measures for launching and developing ECVET**

Two EARLALL members – Scotland and Wales – are already well advanced in developing comprehensive credit and qualifications systems. Wales has also worked with the Basque Country on a joint project ('Systems Action') to explore the scope for establishing the recognition of common competences in two specific vocational areas and several EARLALL members are currently engaged in another joint project ('EsVAC') which is focussed on developing common approaches to the assessment of competencies for vocational qualifications. The Systems Action work has fed into the EsVAC work and another related joint project on assessing competences has recently been proposed by the Basque Country with a focus on guidance systems. Scotland and Wales are both currently participating in a Leonardo-sponsored EQF pilot project; and, with support from EARLALL, they jointly hosted a very well attended seminar in Brussels in October at which we were able to showcase the work of EARLALL regions in the whole field of transportable qualifications, creditisation of learning attainment, and recognition of competences.

We think it is important that, through national qualifications frameworks, the overarching EQF should be the main reference point for ECVET; and we therefore see the ECVET being developed and implemented in close conjunction with the EQF. The launching of ECVET will thus be more of a process than an event - a 'roll-out' as it becomes further developed and progressively established on a voluntary basis in more and more parts of Europe.

### **4.2.5 The potential of ECVET to improve capacity**

To quite a considerable extent, as long as ECVET is established and consolidated as a simple, streamlined non-bureaucratic system based on transparency and mutual trust, the decisive factor in ensuring that improves skills capacity by enhancing mobility will lie in achieving a maximum level of mutual trust.

ECVET should help to improve the impact of programmes of learning by enhancing partnerships and providing a platform for mobility to occur, as proposed in the consultation document. If ECVET could be implemented irrespective of the learning context, it would enable the facilitation of transfer and validation of non-formal and informal learning outcomes. However, other factors create barriers to mobility such as language, college time, motivation of learners etc. Social and economic barriers can also affect programme participation and this is not something that a Framework can solely help to eradicate.

It may be possible for ECVET and Europass to be mutually supportive. However, the enhancement of mobility will depend crucially on the attitudes of Member States and the removal of national barriers that exist. ECVET will be just one tool; and, as suggested earlier, it will require the integrated implementation and promotion of EQF, the Bologna process, ECVET, and Europass to make a real difference.

Yours sincerely,



**Kent JOHANSSON**  
President

**European Association of Regional and Local Authorities for Lifelong Learning**