



ETUCE Position Paper in first response to the Commission's Consultation on the ECVET

In response to the Commission's consultation process on the ECVET, ETUCE has conducted an internal consultation of its affiliates throughout the EU and EFTA area. The present position paper is based on responses from ETUCE member organisations in 16 countries representing teachers and trainers in VET, general education and higher education.

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In general, ETUCE supports the basic objectives of introducing a credit transfer system in VET: to increase the possibility for citizens to transfer between different education and training systems and between working life and education systems, including from non-formal and informal learning settings to formal settings, and ensuring that previous learning and work experience is properly recognised and validated. A credit transfer system in VET *can* be a useful tool to increase transferability and transparency within the VET systems. The increased cooperation among VET systems, which a common credit system necessitates, can also bring about additional benefits in terms of setting in place cooperation structures which can be built upon when further developing policies to promote lifelong learning in Europe.

However, the success of the ECVET depends on whether it will be a practical and simple tool which is trusted by its users, i.e. the learners, employers, education providers, national authorities, etc. *At present, the Commission's outline of the ECVET is as yet quite vague and general, and it is difficult to foresee all the consequences which the ECVET might have.* It will be hugely important to ensure that the ECVET does not give rise to unnecessary bureaucracy or administrative burdens which are not proportionate to the goals it fulfils.

The present outline of the ECVET gives rise to a number of questions and concerns, which needs to be carefully considered in the Commission's further development of the proposal.

Added value of the ECVET

The added value of the ECVET will depend on the kind of system for validation of learning already in place in Member States. For some countries, the purpose of the ECVET with regard to validation of learning within a country is already fulfilled by national instruments. In other countries, ETUCE finds that the ECVET may influence a positive development towards more coherent national systems of vocational qualifications, more clear definitions of the individual parts that make up a VET qualification, and a more coherent national curriculum for VET, where appropriate.

If the ECVET can succeed in enabling proper recognition of non-formal and informal learning, it will be an added value in many countries.

However, when it comes to cross-border mobility, it must be asked what the added value will be in comparison to the Europass? Although the two instruments evidently are different, they serve at large the same purpose. By introducing the ECVET what will be the future of Europass?

Ensure a high-quality coherent course of education for young people in VET

The introduction of ECVET and its request for dividing a qualification into separate units must not reduce the incentives for young people in initial VET to aspire for and complete the full qualification, nor must it reduce the possibilities for educational authorities and teachers/trainers to design a coherent and continuous national course programme for the full VET qualification.

It must be remembered that the division of a qualification into units and modules is a technical necessity, but it must in no way be to the detriment of perceiving a VET qualification as one coherent entity. The possibilities for progression – to move to increased demands and learning level – deteriorate significantly by a learning path that is split into separate modules in a too freely way.

From a pedagogical perspective, the possibility for an integrated approach – combining the teaching of a range of competences, skills and knowledge – diminishes the more fragmented the course is. The demand for the possibility of individualised learning pathways makes it difficult to maintain a coherent and integrated design of a course programme.

ETUCE acknowledges that a credit transfer system can enable possibilities for adults in VET to obtain qualifications on a part-time basis, and can enable adults, in particular non- or low-qualified workers, to obtain the needed qualifications on the basis of a combination of work experience, formal training, informal training, etc. but ETUCE stresses that with regard to young people, a solid, high-quality and coherent course of education – taken in a continuous path – must remain the primary political priority.

Definition of learning outcomes and allocation of credit points – further clarification needed

The definition of the learning outcomes – in terms of knowledge, skills and competences – related to the individual modules/units of a qualification is the core of the ECVET, with the related credit points as a complementary indicator. On this aspect, a number of concerns remain however:

It is important to remember that not all forms of education and training can be capitalised as credits, nor can all forms of education and training be easily identified as professionally-oriented.

The combination of theory and practice is important in VET. The division of a qualification into units/modules must take that into consideration. But how can work experience and education or training courses be weighted in the ECVET in a way that creates mutual trust?

- Should the duration of work experience be weighted equally to duration of a formal course of training/education?
- Is it possible to accumulate work experience in “blocks” and exchange it for a part of a formal qualification?
- Who is awarding credit points obtained in the different settings, and what kind of level should they have?
- In general, more clarification is needed regarding the allocation of credit points. For example, a simple division of the 120 units into 12 units of 10 points may not bear a direct relationship to the importance that some units may have within a full module or qualification. Furthermore, which appeal possibilities should

there be for the citizen/student who is dissatisfied with the credit points allocated?

ETUCE recognises that a focus on learning outcome can be necessary to allow for comparisons, but it is important that also other aspects are taken into consideration in the allocation of credit points to a qualification, as also suggested by the Commission (p. 13-14).

With regard to the definition of learning outcomes for each qualification, it will be of utmost importance to ensure a broad agreement and clarity on this issue at national level.

Broad agreement should be sought with the national social partners at sectoral level as to what knowledge, skills and competences are required for the qualifications appropriate to each sector.

There is a need for a precision as to who the competent bodies are, as they will play a crucial role in ensuring that the ECVET will be trusted. Acceptance of the ECVET depends on the objectiveness and reliance of the competent bodies responsible for measuring units and credit points. The criteria they use must be clear and transparent to all users, and the tasks of all actors involved must be clearly established. In some Member States VET is mainly publicly provided, while in others a variety of both public and private providers are involved in VET. This poses different kinds of challenges with regard to the role of the competent authorities and with regard to quality assurance. Furthermore, the competent bodies must maintain a close relation to the practitioners and training providers in the field – the teachers/trainers, the training institutions, employers, work place trainers, etc – and draw on their expertise when developing assessment methods.

The question of how long time the possession of a “unit” remains valid is important and must be clarified.

The units of learning outcome must only be minimum standards. The introduction of ECVET must not lead to a lowering of standards or formal requirements for qualifications where good standards have been achieved.

Will the education providers’ administrative burden increase? If teachers and trainers use time on administration at the expense of teaching time it can lead to the counterproductive effect of an increase risk of drop-outs, in particular among the weakest students.

In general ETUCE is very concerned on how it will be possible to create a ECVET system without a heavily bureaucratic burden on national administration leading to the opposite of the purpose.

Combine mobility with stability

It is important to note that within Europe different countries have different needs with regard to mobility. Mobility is not an unambiguous good. Forced migration and a considerable flow of qualified labour from Eastern countries to Western countries is a reality for some Member States and is a destabilising factor in some parts of Europe. With regard to the proposal for ECVET, the terminology used should be that ECVET enables mobility, in order to mark a difference to involuntary mobility. In short, it is

important to ensure that mobility measures are combined with stability measures in any case.

The relation between ECVET and ECTS

ETUCE finds that there is a need to clarify the position here and now of the ECVET vis-à-vis the ECTS. It is important to increase opportunities for citizens to advance from one level of education to the other, and the ECVET is evidently less useful if it is only used and understood within the VET systems. A number of qualifications, e.g. nurses and teachers, are differently categorised in different countries, i.e. in higher education in some countries and in VET in others.

- How will comparability of such overlapping qualifications be ensured?

ETUCE acknowledges that the methodology of the ECTS – which is based on work load and duration – is not feasible to use as a single parameter within the area of VET. However, to the extent that it will prove possible and appropriate, a common system of credit transfer should be developed in the long run. Certainly, the establishment of two different credit transfer systems must in no way lead to the creation of additional barriers between higher education and VET.

- How will the Commission suggest the relation to the ECTS to be set out in the longer perspective?

Implementation at national level

It is important to remember that the extent to which validation systems and coherent qualification systems are in place varies greatly between the EU member states, in particular with regard to systems for validating non-formal and informal learning. In some countries, the existence of too many authorities involved in qualification systems impedes the well-functioning of certification procedures, impedes the transferability between systems, and causes in general a lack of transparency and lack of quality assurance in the qualification system.

Other countries are currently in the process of aligning their internal qualification systems. Sufficient time must be given to ensure that implementation of the ECVET is done according to the needs of the national context and to ensure time for a broad agreement with social partners on the implementation. Coordinated cooperation between all actors involved will be crucial.

ETUCE stresses that it will be important to ensure sufficient EU support – e.g. via funds from the ESF and the LLP – to those countries particularly in need of resources for developing their qualification systems and notably for ensuring proper quality assurance.

Ensure the positive diversity of education and training systems in Europe

ETUCE stresses that the ECVET should lead to compatibility and transparency of qualifications in VET systems, not to harmonisation. The ECVET is not just a tool that citizens can choose to use; it is a system that introduces concrete changes in the national qualification systems. It is evident that the ECVET can only be useful if used in connection with the National Qualifications Frameworks and the EQF. However, as is the case for the NQFs, it is important that each Member State strikes a balance

between implementing ECVET in a manner which suits the national context but yet links up to the overarching European system.
This operation can however only be done with a full involvement of the social partners.

Measures to promote lifelong learning

As regards the obstacles to mobility which the ECVET sets out to resolve, ETUCE agrees that lack of validation of learning outcomes from a stay abroad or when moving between different learning contexts is one of the obstacle to mobility within VET, *but ETUCE stresses that the main challenge for making lifelong learning a reality in Europe is lack of access to training and lack of funding.* ETUCE reminds that – in addition to the ECVET – continuous efforts must be made to set in place measures that enable access to training. In EU Member States where only 1-2 % of the population are involved in lifelong learning, citizens need first and foremost learning opportunities.

ETUCE reminds that the ECVET is one tool among other measures to further lifelong learning. Sufficient guidance, information, funding, quality assurance, high-quality provision in the lifelong learning arena is still a major challenge in a number of EU member states. And in many countries, more still needs to be done to set in place coordination structures for all the actors – local, regional, and national authorities, social partners, training institutions, etc – involved in lifelong learning.

Further development of the proposal

Finally, ETUCE stresses that the Commission must allow sufficient time to further develop and improve the proposal for the ECVET. The foreseen formal proposal should include a provision for a period of evaluation, and it must be ensured that the terms used are equally understood throughout the EU by all stakeholders, institutions and accepted by social partners.

ETUCE underlines that a consultation period of slightly less than 5 months, from November 2006 to March 2007, is too short time. *In a number of Member States, proper consultation of stakeholders were not organised by the ministries.* For the further proceedings, ETUCE encourages the Commission to strongly call on Member States to involve national social partners and other stakeholders on this issue and await real national involvement.

Finally ETUCE supports and encourages that the Commission is testing the system at sectoral basis on national level, including with the participation of social partners. ETUCE looks forward to being further involved and consulted as a social partner in the field before a final proposal on the ECVET.