

*EUROPEAN COMMISSION'S CONSULTATION ON EUROPEAN CREDIT SYSTEM FOR
VOCATIONAL EDUCATION AND TRAINING
(ECVET)
EUROCOMMERCE'S CONTRIBUTION*

POSITION PAPER

30 March, 2007

EXECUTIVE SUMMARY

The European Commission has recently issued a consultation document on the development of the European Credit system for Vocational Education and Training (ECVET). The objective of the consultation is to create a European instrument which will facilitate the transfer of learning outcomes acquired from one learning context to another (formal, non-formal or informal) and from one system of qualification to another.

EuroCommerce believes that building a more skilled Europe requires a partnership involving all levels: EU, national governments, business, education and training providers and individuals.

Member States have a responsibility to deliver basic standards of literacy and numeracy. Despite improvements in recorded performance in schools, we find too many recruits who lack in basic skills. This needs to be tackled within state education systems as a matter of urgency.

More still needs to be done to ensure that further education qualifications produce skills that employers' value. We also believe that initiatives led by employers themselves, where appropriate, should be recognized by Member States as being of equivalent status. This is even more important given the lengthening of working lives and the need to keep skills relevant via training.

Management education in the US is a huge advantage for US business and the US economy. We urge the Commission to introduce a strategy to ensure that the EU becomes a world leader in this area.

Ways need to be found to incentivise smaller businesses to increase access to lifelong learning. Funding should be targeted to cover the costs of learning provision and to enable small businesses to fund workplace cover for those employees absent on training programmes

Against this background Eurocommerce welcomes the ECVET approach since it is focussed on learning outcomes and takes into account both formal and non-formal learning. However, we believe more work needs to be done to increase the feasibility of a common European ECVET system based on the allocation of credit points.

I – INTRODUCTION - THE PURPOSE OF THE CONSULTATION

EuroCommerce welcomes the ECVET initiative since it is a practical solution aimed at improving Europe's skills, incentivising lifelong learning and facilitates mobility, three objectives that we fully support.

The Commerce sector is a labour intensive one, providing jobs to 30 million people in the EU. It is also one of the few sectors where employment is increasing. It is working hard to bring opportunities to those who may find difficult to enter the labour market and to enhance their perspectives through training and experience.

In this highly competitive sector, companies invest in training to meet ever changing consumer needs, boost staff loyalty, help people have more interesting jobs and attract the best people available to work in the industry.

ECVET should be a valid help to motivate more people to participate in continuous training as well as to enhance the mobility of young people in initial vocational education and training.

ECVET is seen as a constructive initiative which should contribute effectively to the transparency, transferability and recognition of learning outcomes at European level and stimulate national and sectoral reforms in supporting Lifelong learning.

II – THE PURPOSE OF AND THE REASONS FOR AN ECVET SYSTEM

1. Are the most important objectives and functions of a European system of credits for vocational training and education and the role of competent authorities fully outlined in the Commission's consultation document? If not, what is missing?

In our view, the objectives and functions of ECVET have been well explained in the consultation documents.

However, EuroCommerce considers that the link to the other European Lifelong Learning Initiatives, such as European Qualifications Framework and EuroPass needs to be clarified to avoid confusion.

2. What would be the main added value of the planned ECVET system?

The added value of the intended ECVET system would be first of all the promotion of lifelong learning, the facilitation of mobility and the provision of an additional incentive for employees to engage in training and education.

The approach is interesting since it is competence based, focussed on learning outcomes and taking into account both formal and informal learning. Moreover, the voluntary character of ECVET is another appreciated feature.

Similarly, EuroCommerce fully 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 vocational education and

training. EuroCommerce regrets however that the necessary crossovers between European Qualification Framework (EQF) and ECVET are only mentioned at the start of the consultation document. When it comes to the description of ECVET, the overall impression is that it describes a system that is independent on EQF, but seem to perform partly the same functions. ECVET should at the contrary be treated as an element of EQF. In this way, credit points should be regarded as quantitative auxiliary descriptors and could contribute to the implementation of a common system encompassing all areas of vocational training.

Another benefit of ECVET would be to attract more people to the learning context.

III – TECHNICAL BASIS FOR ECVET

3. Do some technical specifications need to be set out in greater detail with a view to the practical implementation of ECVET? If so, which ones?

EuroCommerce sees the proposal regarding the allocation of credit points as vague and at times contradictory. The credit points should be only a secondary element and only a source of information. Therefore, further clarification on this question is imperative.

4. Do ECVET's technical specifications take sufficient account of the:

- **evaluation**
- **validation**
- **recognition**
- **accumulation**
- **transfer**

of learning outcomes whether formal, non-formal? If not, please give details.

EuroCommerce considers that these aspects are sufficiently detailed in the consultation document. The element that we regard as the most relevant is the transfer of learning outcomes from one learning system and from one country to another.

However, we do think that greater thought should be given to ensuring that employee provided training is also recognised in addition to formal training and education given by third party providers.

5. Are the allocation of credit points to qualifications and units and using a reference figure of 120 credit points sufficient to ensure the convergence of approaches and the coherence of the system at European level? If not, what would you suggest?

As already mentioned above, EuroCommerce considers that the system based on the allocation of credit points risks being too complex to be of much help to employees and employers. We are concerned that attributing credit points to all learning

outcomes across countries whether occurring through formal, non-formal and informal learning pathways needs to be as simple as possible if it is to work.

We are also concerned that the proposed ECVET structure does not reflect the very diverse forms of learning provisions in vocational education and training across and within Member states.

Moreover, the proposed reference figure of 120 credit points could hardly facilitate the convergence of approaches in a coherent system at European level. The consultation document does not provide with a harmonised basis for assessment. The 120 credit points are only related to learning outcomes achieved in a formal context. There is no solution provided for non-formal and informal learning outcomes. These points should be clarified.

Since the objective at long term is to achieve convergence with the ECTS (European Credit Transfer System), regarding the transferability of the results from university education, a comparable system should be established. The ECTS system mentions an average of 60 credit points/year, based on the workload. A credit point system for vocational training should promote transferability in an effective way.

IV – IMPLEMENTING ECVET

6. Under what conditions could describing qualifications in terms of learning outcomes and expressing them in units effectively improve the transparency of qualifications and contribute to the development of mutual trust?

The description of the qualifications in terms of learning outcomes should contribute to improve transparency and mobility in vocational education and training. To contribute in an effective way to the development of mutual trust, it is necessary to implement a period for dialogue within the national systems, on the practical implications of the proposed ECVET for each system, involving all the relevant players in accordance with national practices. The development of an ECVET system should therefore follow the following principles:

- Promotion of both horizontal and vertical permeability;
- Ensuring compatibility with ECTS
- Equivalence of vocational training and general education should be taken as a basis
- Standardized procedures for ECVET updating, evaluation and quality assurance should be established from the beginning.

7. Which criteria or combinations of criteria for allocating credit points could be elected and used?

As we already explained under the point 5., we consider that the proposed system of credit points is a source on uncertainties and further work on this aspect is therefore essential. A useful tool to facilitate the transfer of learning outcomes from a country to another could be a Memorandum of Understanding between the respective learning

providers which would enable to record the experiences gained from a period of mobility based on learning outcomes.

In order to facilitate the implementation of EVCET, vocational education providers and competent bodies could establish partnership agreements or memoranda of understanding (MoU). During the phase of initialisation, such memoranda could contribute to the creation of the climate of trust which is necessary to ensure the durability of the system, its operational characteristics and the effective credit transfer.

In the MoU, partners could specify:

- Correspondence between qualifications (unit and credit points) and learning outcomes concerned by transfer. The levels of the European Qualification Framework (EQF) could contribute to the establishment of the correspondence.
- The assessment, transfer and validation processes (units or part of units).
- The specifications for quality assurance.

The partnership agreements could be established between different authorities or organisations according to the desired degree of co-operation. A model memorandum of understanding could be developed at European level.

Such an initial system would better reflect the voluntary nature of the implementation of ECVET, but also grant the respective learning providers the flexibility required to implement the Memorandum of Understanding according to their specificities. This would also allow the recording of learning outcomes for SMEs that are not formal learning providers.

It could also be a first step to show the way for other appropriate mechanisms to record learning outcomes in the longer term.

**8. Are there any features in your qualifications system which would favor the introduction of ECVET? What constraints, if any, do you foresee?
NB NOT RELEVANT AT EU LEVEL**

**9. How and within what time frame (launch, introduction, experimentation, widespread introduction) could ECVET be implemented in your country?
NB NOT RELEVANT AT EU LEVEL**

V - MEASURES FOR SUPPORTING THE IMPLEMENTATION AND DEVELOPMENT OF ECVET

10. What kind of measures should be taken at European national and sectoral levels to facilitate the implementation of ECVET?

Effective communication of ECVET and simplicity of processes are crucial for the proposal to maximise its potential. Communication must be supported by local language, accessible communication at Member State level if the ECVET message is to reach its full potential audience.

The vocational education and training providers at the relevant level could establish partnership agreements or memoranda of understanding. During the initial phase, such instruments could contribute to create the necessary climate of trust to guarantee the durability of the system.

These agreements could be established between various authorities or organisations, according to the desired degree of co-operation (bodies responsible for qualification, network of vocational education and training providers, training centres, schools...)

At the beginning, such agreements should be implemented by the relevant players in accordance with the national practices. However, it could be useful to discuss the first results and to collect the best practices at European level in a second stage.

11. What documents, manuals and guides could be developed to facilitate the implementation of ECVET?

The Commission could launch and supervise pilot projects on ECVET to develop pedagogical materials aimed to provide the main actors involved (public authorities, training providers, social partners, companies...) with the adequate support to facilitate the implementation of ECVET. Simple, web-based communication and tools should also be explored to help access ECVET information throughout the Community.

VI. ECVET'S POTENTIAL FOR ENHANCING MOBILITY

12. To what extent and how will ECVET be able to contribute to the development of transnational and even national partnerships?

EuroCommerce regards transnational co-operation on issues related to vocational education and training as very important. We believe that greater transferability and recognition of training and qualifications will help remove uncertainties that citizens face when wanting to work outside their home Member State. It will also help build confidence amongst employers in training and qualification provided elsewhere in the EU

This is an issue in the framework of their sectoral Social dialogue Committee for the Commerce sector. Both social partners - EuroCommerce and Uni Europa - have signed a letter of intent for the setting-up of the certification body and the follow-up of the BeQuaWe European Certified Training project jointly with Rewe, Metro and the Institute for Vocational Training Lindenstrasse (Cologne). The purpose of the envisaged cooperation is to set up a European vocational training and certification system for the commerce sector which is complementary to national systems. It should be particularly useful in those countries that have no elaborate sectoral vocational training system yet. It should increase mobility and make qualifications transparent. (More information on this project can be found in Annex 1)

Such partnerships could also be developed for the practical implementation of ECVET.

13. To what extent and how will ECVET be able to help improve the quality of Community programmes on mobility and participation in these programmes?

One of the main advantages of ECVET is that it encourages mobility in vocational education and training. Therefore, it should complement and improve the quality of other EU programmes, especially "Leonardo da Vinci", which enables people in their initial vocational training period, to also spend some time working and learning in another EU country.

14. To what extent and how do you think that ECVET and Europass could complement each other to enhance mobility?

According to the consultation document, ECVET is an instrument for enhanced mobility. In the general context of developing a lifelong learning society in Europe, the mobility of learners is identified in the Copenhagen process. Europass is another initiative of the European Union to help people make their skills and qualifications clearly and easily understood, supported by a network of National Europass Centres. Therefore, these two instruments should complement each other to enhance mobility in vocational education and training. However, it is difficult for the time being, to have a precise idea on the practical implementation of their complementary nature.



Annex 1 – Description of the European Commerce Qualification project (BeQuaWe)

The European Commerce Qualification project (BeQuaWe) aims to develop innovative qualification modules for the commerce sector through transnational cooperation. The project was funded by the EU Leonardo Programme and involves actively seven Member States.

The qualification modules should help to teach – in parallel to the national training systems where they exist – a set of skills that is the same all over Europe and could be certified by competent bodies in the Member States, provided further efforts in this area. An interactive CD-ROM has also been designed. The scheme will be adapted to young people with learning difficulties.

The project co-ordinator underlines the fact that social partners played an important role in the project and invited social partner representatives from all Member States to whom it expressed its interest to participate in the follow-up of the project. It should be extended to other Member States.

The potential of this project is particularly high in Member States that do not have a fully developed vocational training system.

During the last plenary session of the Sectoral Social Dialogue Committee, the social partners signed a letter of intent for the setting-up of the certification body and the follow-up of the BeQuaWe European Certified Training project jointly with Rewe, Metro and the Institute for Vocational Training Lindenstrasse (Cologne).

The project manager of BeQuaWe explained that the purpose of the envisaged cooperation is to set up a European vocational training and certification system for the commerce sector which is complementary to national systems. It should be particularly useful in those countries that have no elaborate sectoral vocational training system yet. It should increase mobility and make qualifications transparent. For more information on the project: see <http://www.bequawe.de/cpo/home/index.php>