March 2007

Position of leading German business organisations

on Commission staff working document "European Credit system for Vocational Education and Training (ECVET)" dated 31 October 2006

The German business community*) supports the objectives of promoting transparency, mobility and transferability in vocational education and training. However, whether and to what extent the ECVET credit transfer system as currently designed can contribute to meeting these objectives is questionable.

The ECVET consultation document does not describe a fully fledged system which could be approved and introduced tomorrow. It has little to say about practical procedures and offers no solutions, even for fundamental principles. Problems relate primarily to the lack of clarity as to what is understood by "ECVET".

1. In the public debate, ECVET is sometimes equated with the university ECTS system, but with which it has little in common.
2. Rather, there are large overlaps with EQF. Exactly as with EQF, ECVET learning outcomes are supposed to be described in the form of knowledge, skills and competences. This makes it difficult to identify the added value of ECVET.

The German business community can only accept and apply ECVET if it generates an added value for companies and other users. That would be the case if

- the focus of ECVET is placed first and foremost on the original goal of **facilitating cross-border mobility**,
- ECVET is an **instrument** which can be used **on a voluntary basis** but is not compulsory – i.e. training service providers can decide to award, recognise and credit points on the basis of national rules,
- ECVET is a **component of EQF** and the qualitative descriptors of EQF are supplemented by the quantitative dimension of ECVET,
- the **structure** of ECVET and the associated **procedures** are **transparent**,

*) represented by employer and business federations as well as chamber organisations

- the **basis for calculating ECVET credits** in Europe is **uniform**,
- **ECVET and ECTS are compatible** and efforts focus on a common output-oriented credit system which promotes transferability in the education and training system,
- ECVET entails neither more bureaucracy and costs nor the creation of additional structures.

The German business community sees ECVET as a component of EQF/NQR, but not as a stand-alone instrument linked to EQF only through the inclusion of levels. ECVET can be a quantitative auxiliary descriptor in the framework of EQF. The qualitative competence description is provided by EQF and/or NQR. Implementation of ECVET should follow the description of the learning outcomes of individual course units as established by EQF/NQR. This approach is the basis of this position.

In addition, a progressive and non-bureaucratic procedure is necessary:

- Start with cross-border student mobility,
- Collect and evaluate experience, and examine the possibilities for transfer to other areas,
- Test, evaluate and, where appropriate, develop transfer possibilities.

The cost-benefit ratio should be taken into consideration throughout the process.

It is against this background that leading German business organisations respond to the questions as part of the ECVET consultation procedure.

Responses to the European Commission's questions

4.2. Questions for the consultation process

4.2.1. The purpose of and reasons for an ECVET system

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 consultation document? If not, what is missing?

A complete outline is missing: some aspects are dealt with inadequately, others unnecessarily overburden ECVET. For these reasons, it is not possible to talk about a fully fledged system. Rather, the proposal is only at the conceptual stage.

More specifically:

The purpose of and reasons for ECVET

Neither is adequately outlined. The consultation document describes a possible additional element but not a *fully fledged system* or *instrument,* which is unacceptable as currently proposed. This differs essentially from the European Commission's EQF consultation process and proposal.

The current ECVET proposal is based on four elements:

1. Description of learning outcomes in the form of knowledge, skills and competences,
2. Validation and recognition of learning outcomes,
3. Subdivision of vocational qualifications into units, which are described as learning outcomes,
4. Credit points.

The first two elements are already covered by EQF. It is therefore unnecessary, even counterproductive to take account of them in ECVET. The third element is already a theme for transfer of EQF into an NQR, at least in Germany, and hence does not need to be covered in ECVET either. The fourth element plays a subordinate role, because both the reference to EQF levels and definition of the value of a point are missing. Credit points alone cannot represent competences. Without an indication of levels and/or graded units, credit points are meaningless and will lead to confusion in the national and European debate.

German business submitted a proposal during the EQF debate in March 2005 as to how this issue can be dealt with: credit points should be brought in at a purely functional level, as a "quantitative auxiliary descriptor" (see point 4.2.2).

Relationship between ECVET and EQF

A "European credit system" in vocational training should help to promote mobility and take account of acquired educational skills, and to promote flexibility and transferability. It is problematic that the necessary crossovers between EQF and ECVET are only mentioned at the start of the consultation document. When it comes to the description of details of ECVET, the differences are so clear that what is being described is really a system that is independent of EQF but partly sets out to perform the same functions. ECVET must be a component of EQF, so that credit points which are quantitative auxiliary descriptors are an essential, additional element. The aim should be a common credit points system which encompasses all areas of vocational training.

Objectives

ECVET is overburdened with a wide range of divergent objectives:

– Promotion of individual mobility within vocational training systems,
– Validation of learning outcomes,
– Transparency of qualifications,
– Mutual trust and cooperation between training and education providers in Europe.

These objectives cannot be achieved with the present proposal. They overlap with the functions, objectives and effects of EQF. Accordingly, there is no reason to examine them in detail in the framework of this consultation.

It is pointed out that the instruments discussed in the consultation document such as partnership agreements, educational agreements, Europass and references already make it possible to achieve essential objectives of ECVET.

Proposals

The European Commission should start by limiting ECVET to the original idea of promoting cross-border mobility, then test, evaluate and finally verify whether this idea is transferable. In addition, it should be made clear what ECVET can do and what it cannot do (cf. EQF consultation document: "what it is not"). Similarly, it is important to evaluate what additional benefits – measured against costs – credit points have brought in the university system, and what benefits they might bring to vocational training. Lastly, the extent to which the above-mentioned instruments can meet the desired objectives of ECVET should be examined.

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

In the view of German business, the most important additional benefit of ECVET at this point of time is promotion of cross-border mobility. This relates in particular to initial vocational training. That is a reference to the original idea in the ECVET debate. The goal is to promote mobility and transferability in Europe. It should be possible to credit learning units acquired abroad to educational courses in the country of origin – without any loss of time on the part of the student. If the quality is equivalent, points can be credited more easily. As a result, learning outcomes can be used more systematically and more reliably, and are easier to transfer.

However, the following conditions must be met if this additional benefit of ECVET is to be met:

1. The value of points must be defined in a harmonised manner across Europe. Only then will credit points provide valuable additional information about acquired qualifications and can they be transferred on a voluntary basis across borders into other training systems. It would be counterproductive to place alongside each other Member States' points systems which are not only different but also incompatible with ECTS. This would further cement the compartmentalisation of training areas and dilute the cross-disciplinary character of EQF.

2. German business believes that ECVET must have an eye to the limits of modularity. Education and training courses must not be broken down into unduly small units which are no longer capable of providing information about a rounded and self-contained capacity for action. It is essential not to undermine integrated and high quality vocational training in Germany.

4.2.2. The technical basis for ECVET

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?

Do ECVET's technical specifications take sufficient account of the:
• evaluation,
• validation,
• recognition,
• accumulation,
• transfer
of learning outcomes whether formal, non-formal or informal. If not, please give details.

The description of technical specifications is insufficiently detailed. Important themes are not addressed in the consultation document:

- It is not clear how the different learning types (formal, non-formal, informal) relate to each other and whether they are supposed to be on an equal footing.

- There is no explanation of what is to be done about competences which are documented but which have not been maintained or are obsolete.

- The text does not clarify how competences can be credited when the work area changes.

- It is not obvious what EQF level allocation applies for the individual units and how these relate to full qualifications. As a component of EQF, ECVET must be aligned on the levels provided for in EQF.

- No reference whatsoever is made to the cost of implementation.

It is not possible to identify a fully fledged and coherent system in the few technical details provided. The stated functions of ECVET are already largely covered by other instruments

- At least in terms of full qualifications, competences are described with reference to EQF. The description of part qualifications is already laid down in EQF.
- EQF promotes validation and recognition of learning outcomes.

There is a danger that divergent ECVET descriptors will come into being alongside the existing EQF descriptors. This would make it more difficult to use EQF because

- the planned action path is described only in very general terms,
- detailed arrangements are left to the relevant national authorities.

Competence descriptions must be based on a common understanding and be accepted by the general public at large. Terminology and a methodology coordinated at EU level are necessary to ensure that acquired competences are still easily understood after a transfer. In this regard, EQF descriptors must be applied consistently.

The new element of ECVET is the allocation of credit points. The additional information value of credit points is not clear from the consultation document:

- It is foreseen that learning outcomes will be listed and evaluated in a “transcript of records”, which does not require credit points.
- Credit points are described as an additional numerical representation of each unit, which is supposed to show the weight and the value as compared with the total qualification. Yet, the basis on which points are to be allocated remains the responsibility of the relevant national authority.
- However, putting this on one side, credit points alone cannot represent competences. They constitute a quantitative and not a qualitative measure. As such, they supplement the qualitative descriptions provided under EQF.

Accordingly, German business believes that ECVET can only serve as a quantitative auxiliary descriptor in the framework of EQF as set out in the model it proposed in 2005. Under this model, credit points “reflect average learning periods needed to master the competence. Within defined areas and fields of competence, they serve as ‘credit units’ for equivalent competences”.

The consultation document works on the assumption that credit points can facilitate the transfer of learning outcomes, as a general reference framework. However, the allocation of credit points without a uniform basis for assessment cannot promote transparency. It can be expected that different levels of credit points will be allocated for the same achievements.

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?

The proposed reference figure of 120 credit points is not suitable for facilitating the convergence of approaches in a coherent system at European level. The consultation document makes no provision for a harmonised basis for assessment. It relates the 120 credit points only to learning outcomes achieved in a formal context, without offering a solution for the allocation of credit points for non-formal and informal learning outcomes. The criteria for allocating credit points will be left to the discretion of the relevant national authorities. The figure of 120 credit points is set at an arbitrary level. Unless and until it is clear what credit points represent and/or measure, it will not be possible to say what any particular figure means.

Since the long-term aim is to achieve convergence with the university ECTS system, comparable orders of magnitude must be used. The ECTS system makes provision for the allocation of an average of 60 credit points a year, based on the workload. A credit points system in vocational training should align itself of this situation, in order to promote transferability. It is important that the order of magnitude matches the content – workload and as a result the depth of technical knowledge in the acquired competence. By contrast, different points scales will hamper transferability between training disciplines and make the desired broad acceptance of ECVET more difficult.

4.2.3. Implementing ECVET

It is pointed out in at the outset that introduction of the ECVET system has not yet been decided.

German business is against introduction of a stand-alone ECVET system. Rather, ECVET must become a component of EQF.

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 objectives set out above form part of EQF and have already been discussed at length in the corresponding consultation process.

The following conditions must be in place:

- The EQF levels are underpinned by competence descriptions which can comprise both full qualifications and part qualifications. The relationship between part qualifications and full qualifications must be guaranteed. The central point remains the preservation of comprehensive vocational competence for action in a defined area. A breakdown of education and training courses must not result in unduly small units. Units must also have the objective of acquisition of a vocational competence for action.
- Qualifications must be adequately described and rendered transparent in the participating countries. It must be possible to classify them in an understandable manner into precise levels. Quality assurance procedures must be put in place.
- A harmonised terminology and methodology for describing competences is necessary to foster understanding and mutual trust.

Which criteria or combinations of criteria for allocating credit points could be selected and used?

German business has already made a concrete proposal: credit points are understood and used as "quantitative auxiliary descriptors" in the framework of EQF/NFR (see point 4.2.2).

Are there any features in your qualifications system which would favour the introduction of ECVET? What constraints, if any, do you see?

The European vocational training landscape is highly heterogeneous, unlike the university area. This raises the question as to whether it can be structured using a single instrument.

Experience with the ECTS system in the area of universities could favour introduction of a credit points system in vocational training, since the use of credit points is no longer unfamiliar in at least part of the education and training system. Nevertheless, it is still far from sufficiently clear what value ECTS has actually added in the university area. Initial experience suggests that ECTS points essentially add value in terms of credits for study modules and study periods abroad.

However, credit points in the area of vocational training can facilitate the recognition and crediting of competences acquired as part of vocational training as part of a university course. The prerequisite for this is that ECVET structured in a manner that is compatible with ECTS and that there is accordingly a cross-disciplinary credit points system.

German business sees difficulties in particular in the fact that

- It is difficult to recognise the added value of ECVET,
- The “system” is too overloaded and complicated, and as a result will not be understood by users.

If central players do not ultimately work with ECVET, it will not have any significance. In addition, the cost-benefit ratio must be right. This is not apparent at the present time.

German business holds the view that EQF and ECVET cannot be understood if they are communicated as separate processes, as is currently the case. What is needed is communication to the European public of an integrated approach for promoting mobility and transparency.

How and within what timeframe (launch, introduction, experimentation, widespread introduction) could ECVET be implemented in your country?

German business regards ECVET as a development process within the EQF framework. Hence, bottom-up processes and an intensive exchange of experience should be stimulated in connection with verification of EQF.

4.2.4. Measures for supporting the implementation and development of ECVET

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

For verification of ECVET in the area of cross-border mobility, the focus should be on an intensive exchange of experience. Furthermore, customised advice and information service offers are needed for the different users. The mere existence of credit points cannot promote mobility. Further flanking measures are needed to dismantle known obstacles to mobility.

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

A glossary that provides a common and Europe-wide harmonised understanding of the relevant EQF and ECVET terminology could be helpful. In addition, method guides could foster a Europe-wide consistent description and structuring of credit points and units.

4.2.5. ECVET's potential for enhancing mobility

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

More important than an ECVET system are, in particular, motivation, information, guidance, knowledge of foreign languages and references. Common development of professional profiles and curricula can also foster mutual trust in the outcomes of different vocational training systems. In this regard, special attention must be paid to transferability. EQF offers the framework for this. Within that framework, ECVET can serve as a "quantitative auxiliary descriptor".

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

An ECVET system can make no contribution on its own, only in combination with the existing instruments Europass and Ploteus. What is central is competent guidance on the possibilities for deploying competences in the training and employment system.

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

Europass (especially the mobility Europass) is the transparency instrument for documentation of learning outcomes and should accordingly be developed further. Credit points under the umbrella of EQF could enhance the ability of Europass to provide useful information.

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