REPRÉSENTATION PERMANENTE DE LA GRÈCE
AUPRÈS DE L'UNION EUROPÉENNE

Brussels, 12-4-2007

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16	A-1152				
16. 04. 2007					
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Your Excellency,

I have the honour, to forward herewith a copy of a letter addressed to you by H.E. Mrs. Marietta Giannakou, Minister of National Education and Religious Affairs of the Hellenic Republic.

Accept, Excellency, the assurances of my highest consideration.

Vassilis Kaskarelis
Permanent Representative
of Greece to the E.U.

H.E. Mr. Jan Figel
Member of the European Commission
Brussels

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MARIETTA GIANNAKOU
MINISTER OF NATIONAL EDUCATION & RELIGIOUS AFFAIRS

Μ.Ε.Α. – Ε.Ε.
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σε Καρπίνου

Mr. Jan Figel
Commissioner for Education, Training,
Culture and Multilinguism

Athens, 3 April 2007
Α.Π.Γ.Υ.: 2096

Dear Jan,

In reply to your request on the ECVET consultation document, please find attached the Greek view on the proposed mechanism, which will foster European mobility of qualifications.

This proposal is the outcome of a wide national consultation phase that involved ministries, authorities and institutions functioning in VET, employers and trade unions.

Sincerely

Marietta Giannakou

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Background

In its work programme drafted in Lisbon in February 2002, the European Council of Ministers of Education agreed on a systematic and structured cooperation in education throughout the European Union. The Copenhagen Declaration (2002) defines the need for the development of a credit point system to evaluate learning. Drawing upon the approach adopted by the "European Credit Transfer System" (ECTS) for the promotion of the inner mobility of students that has been in progress in Higher Education since 1989 the"European Credit (Transfer system) for Vocational Education and Training "(ECVET) will in addition consider the specifics of vocational education and training. .

According to the consultation document, ECVET is a "tool" for the citizens that enables qualifications to be described in terms of transferable and accumulative learning units (knowledge, skills and competence) to which the corresponding credit points are attached.
The main purpose of introducing ECVET is to facilitate the transfer and accumulation of learning outcomes acquired by people who participate in mobility periods, moving from one learning context to another (geographical mobility), from one system of qualifications to another. ECVET will be based on the acceptance and voluntary participation of the Member States who will have to adapt their VET systems as well as their national qualifications systems.

The operational scheme of ECVET foresees two types of competent bodies or institutions during the mobility period:

- Bodies whose task will be to assess the learning outcomes achieved and consequently the award of credits.
- Bodies that will validate and recognise the awarded credits.

ECVET will be a mechanism to foster a synergy among the training providers through the support and encouragement of cooperation that it will provide, with a view to unhindered transfer, accumulation, validation and recognition of learning outcomes. This relation will be based on "*Memoranda of Understanding*" that will have the character of a voluntary agreement between providers of vocational education, national authorities and other competent bodies in the participating countries. Then, "*a Learning agreement*" referring to the specialised qualitative and quantitative characteristics of the training period, will be signed by the educational and training bodies from the two countries involved and the learner.

ECVET is a part of the overall project for developing European cooperation in the field of vocational education and training and constitutes one of its most important operational tools. In this regard, ECVET complements the European Qualifications Framework (EQF). In fact, EQF and ECVET are based on common principles and concepts which favour approaches that are:

- focused on learning outcomes expressed in terms of knowledge, skills and competence;
- adapted to the demands of lifelong learning and all learning contexts, on an equal footing;
- geared towards the mobility of people.

Particular remarks

The main challenge that has to be faced is the existence of a huge diversity of European systems providing qualifications, certification, validation and recognition. The majority of these systems are oriented to traditional forms of education and training that use the terms "subject and semester" and not on forms that are based on learning outcomes. This diversity finally implies that ECVET must be designed and implemented in a way which makes it easy to understand and use in a number of different learning environments.

In this direction there is increased need for the establishment of a network of mutual trust between European partners that will be user friendly and cost efficient. The Consultation document moves in this direction by providing all stakeholders an opportunity to express the views and the problems that ECVET will have to overcome when it is set on a pilot implementation. Finally, it is necessary that the application scheme of ECVET should be broad enough to involve the active involvement of enterprises and workers, training providers and bodies and of course it has to be simple and attractive to the learners.

The general impression from the consultation document is positive, although certain unclear points need further clarifications and the support from European tools that already exist or should be developed in the future. The need for experimentation by means of pilot programs and co-operations is the mechanism through which we will be able to identify implementation problems and discrepancies. European VET is mature enough to accept such a system despite the existing difficulties..

A very important dimension, especially for countries like Greece is that of national and vertical mobility which many times remains in the shadow of the more common type of cross-border mobility. In this way individuals will be allowed to upgrade their qualifications by transferring accumulating and recognising knowledge skills and competence, among different sectors of the economy, as well as among various learning environments.

The learning outcomes approach should be in line with the European Qualifications Framework which constitutes dominant political priority. This will be the way to match the demands of the labour market, the training objectives will be clear and the need for personal and professional development will be satisfied. Under the same umbrella, crucial issues will subsequently be emerged for Greece like the recognition of non-formal and informal learning, the new orientation of guidance and counselling and the redefinition of key competences..

We should underline the fact that learning outcomes are the main element of ECVET and the allocated credit points are just a supporting tool. The further

clarification of the terms used to describe the system as well as the operational mechanism of ECVET should become a subject of study at European Commission's level. From the extensive consultation and debate in Greece, the imperative need for systematic and fruitful cooperation between the State, the social partners and other stakeholders arose. Parallel to the European approaches a National work platform should monitor and facilitate the system.

Within the framework of the attempt for convergence of the Bologna and the Copenhagen Processes, ECVET could also be a mechanism to study the mobility relations between VET and Higher Education. A basic requirement here is the comparison of the two different credit systems, ECVET and ECTS.

The demonstrable value added of ECVET should be examined in accordance with the development of National Qualifications Frameworks. These in turn depend on quality assurance which is a strategic keystone to the whole process. Both ECVET and EQF deal with complex issues and we are aware that it would be unrealistic to expect simple and quick answers.

Answers on the questions which are posed in consultation document

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?

The Consultation document moves in the core of the European policies about Vocational Education and Training (VET). It covers the main principles and operation of a European system for VET credit transfer and the role that stakeholders are invited to play. This system, which functions as a supplement to the European Framework for Qualifications (EQF), appears to be pretty ambitious and its adoption by the EU member states opens the way for a series of legislative and administrative regulations and adjustments

depending on national particularities, in order to achieve the presumed added value for citizens and the labor market.

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

The main added value will be the development of a European network of training bodies, which will serve geographical mobility for education and work purposes in Europe. The transparency of vocational qualifications will be promoted considerably, which also signals the promotion of the enhancement and quality of various VET systems. An important feature in this direction is the necessary differentiation of the training status at national and European level, so that VET becomes more attractive to young people and the dominant view changes that sees VET as the "choice for the unsuccessful". It will be of particular value to the workers, since recognition and enrichment of vocational qualifications as well as the expanded opportunities for horizontal and vertical mobility will lead to the reinforcement of employability as well as of personal and professional progress.

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?

It is evident that the Consultation document is the theoretical basis upon which pilot proposals and schemes will be tested in practice, which in the years to come will create a more elaborative operation framework for the proposed system. In the current first phase, the proposed System will be the general framework that is in accordance with the European Union strategies in the field of VET, considering it as a tool for the promotion of Life-Long Learning. Subsequently, already-existing tools (EQF, EUROPASS) will have to be used, and new European tools will have to be developed and implemented that will contribute to the promotion of its practical implementation. It is also essential to develop technical specifications, guides

be approached and promoted with national measures and regulations in correspondence with the principles of the two proposed systems of EQF and ECVET. In this direction, the main priority is the establishment of a national framework for professional qualifications

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?

Credit points are the means and the complementary part of the system. We should consider its "core" to be the description of professional qualifications by means of "learning outcomes". When knowledge, skills and competences are determined by means of quality procedures and criteria, they contribute to the enhancement of attractiveness, quality and effectiveness of VET and cooperate in the competitiveness and social cohesion. The aim should not be the creation of citizens – hunters of credit points, but the essential training as a result of the active cooperation between education partners according to the needs of the labour market

In the long term, credit points in vocational education and training will facilitate mobility, under certain conditions, between VET providers and the Higher Education Institutes, an issue that emerges more and more at European level. At the same time, this two-way communication will create a communication passage of academic education to training and the labour market

The proposed number 120 has certain important advantages:

1. It does not refer numerically to the corresponding credit points system for higher education (60 per year – different basis of reference).
2. As the average mobility period in European mobility programmes does not exceed the period of two-three weeks, this number allows for greater flexibility and measurability in the transfer of learning periods of short duration

of good practices and guidelines, mainly aiming at the facilitation of national authorities and of those bodies that are responsible for the implementation of the designed system. It is certain that as we move from the sphere of the notional to the sphere of the real, the member states of E.U. but also Greece will have to face the problem concerning the sensitive area of levels 4, 5 and 6 of the European Framework for Professional Qualifications, with a sense of responsibility, transparency and social sensitivity. Regulating the relations between VET and Higher Education is an issue that will come up in an exigent way and will be of determining significance for the European dimension of education and training

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.

In the technical specifications text, ECVET seems to be a tool that promotes mobility in the sense of transfer of learning outcomes acquired in different contexts and at different learning levels (horizontal and vertical mobility). In the consultation document, only general directions are given and not the analysis of procedures. We consider that at national level, there will be increased need for a restructuring of the internal procedures used for the assessment, validation and recognition of learning, irrespective of the pathway followed. It is important to note that in the aforementioned procedures the role of national authorities is a determinant, which, out of respect for the particularities of a member state, must not and cannot follow a policy of homogenization Especially for our country, political decisions will have to be taken, concerning the issue of assessment, validation, recognition and accumulation of learning outcomes that result from informal or non-formal pathways of education and training. This important aspect of mobility should

3. Implementing ECVET

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 use of learning outcomes allows for the comparison of learning pathways without regard to the system of education and training and also to the way they were achieved (formal, through experience, through training). Undoubtedly, the process of pinpointing, determining and recording these by sector of economic activity and by specialty, is time-consuming and demands the active participation of all involved stakeholders (the state, social partners, employers, training authorities). In addition, the process of converting professional profiles into training guides structured upon units is a challenge itself that national systems should face, especially those that operate in a traditional way of providing training. As such experiences and pilot applications are limited or their results have not been diffused yet, the preparation of directions and guidelines at a European level would facilitate the attainment of the target and would provide the bodies responsible with the necessary know-how.

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

The criteria for the allocation of credit points will have to be investigated and proposed by means of studies, good practices and pilot allocation, through initiatives pertaining to the Life-long Learning Programme, financed by the E.U. Naturally, a determinant factor for the allocation of credits is the evaluation of the weight of a unit in relation to the entire professional qualification, the time needed and the method of education and training, the existence of relative work experience in the equivalent sector of economic activity.

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

The Greek VET system is oriented towards the traditional form of operation upon programmes of study that are structured on "subjects" and "semesters of training". However, there are some professional profiles that were constructed in the context of Leonardo da Vinci pilot projects, following the Sustainable Professionalization methodology. The Greek Organization for Vocational Education and Training (O.E.E.K.) participated in these projects as a partner. The rationale of these profiles approximates that of the learning outcomes. In addition, problems arise from the centralized structure of systems and the lack of effective communication with the labour market concerning the pursued results.

Social partners and employers participate in training policies but their role should be enhanced so that the real needs of the labour market are met by the training on offer. Lately, steps have been made in the right direction: the passage of the Bill 3369/2005 for the systematization of Life-long Learning and the subsequent establishment of institutes for life-long education and training, the activation of the National System for the Connection of Vocational Education and Training with Employment (ΕΣΣΕΕΚΑ), and the creation of a certification system for professional profiles irrespective of training level (Common Ministerial Decree, Ministries of National Education and of Employment). All these structures are good practices that would favour the introduction of ECVET

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

On the basis of the current education systems, it is necessary to pilot the system at all current levels of vocational education and training. Assuming that the pilot phase would start next autumn and would last for at least two

academic years, we cannot expect a full implementation to be feasible before the year 2010

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?

It is necessary to provide direct funding to European, national and sectoral pilot programmes. In addition, at European level, "guides" of good practices and applications should be issued so that national bodies are facilitated in their adaptation to the new demands. At national level, it is necessary to have cooperation between all bodies, especially social partners, as well as the establishment of a national framework for vocational qualifications. Finally, at sectoral level, there should be further development of current good practices and promotion of the connection of sectoral qualifications with the national ones and finally with the European Framework of Vocational Qualifications

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

1. Study of the effects that the approach based on learning outcomes has upon vocational qualifications.
2. Study on the certification and recognition procedures of learning outcomes.
3. A mapping of good practices of existing systems for the transfer of credit points at European level.
4. Processes for the creation of national frameworks for vocational qualifications and national systems for the transfer of credit points for vocational education and training.
5. Safeguards for the quality of recognition procedures of non-formal and informal learning.
6. Study on the learning outcomes typology.
7. European experience on the construction of education and training programmes based upon units.

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?

To ensure the successful operation of the ECVET, it is indispensable to construct a European network for cooperation and mutual recognition. The recognition and validation of learning pathways, according to the quality safeguard procedures, calls for cooperation between states, public organizations, education and training institutions as well as enterprises. The vertical (national) dimension of the system will require the synergy of organizations that are presently active in fields incompatible with the traditional approach. In the next years, there should be an exploration of "communication" and recognition configurations between Initial and Continuing training, in-service business training, further education programmes

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

The establishment of ECVET will automatically upgrade the added value of community programmes, since they will gain greater transparency, immediate application and development prospects. Until nowadays, participation in a European mobility programme has been mainly about the acquisition of "work and cultural experience". However, the establishment of procedures for the recognition, validation and transfer of learning outcomes will make these programmes more substantial as well as attractive, because those involved will invest in their education and training there, since they will be able to recognize, validate and transfer the achieved learning outcomes in an official and established way. Moreover, the proposed system imposes the

establishment and observance of quality criteria, so that the provided education and training remains competitive.

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

Europass and ECVET are the tools that have been developed for citizens' service within the European Framework for Vocational Qualifications. In the Europass folder, there are the documents-tools promoting transparency, recognition and transfer of credits, which are already widely known and accepted by the European citizens. The Europass CV, the Europass Mobility document and the Europass Certificate Supplement observe the priorities set at a European level and can provide support to the EQF and the ECVET. Recording units and the corresponding credit points will constitute citizens' vocational qualifications more clear.