



REPUBLIC OF LATVIA

CABINET FIGEL					
[Handwritten initials]					
- 2. 05. 2007					
JF	MA	MG	PC	DH	PJ
EW	BB	MS	MAM		Arch

MINISTRY OF EDUCATION AND SCIENCE

VAĻŅU IELA 2, RĪGA, LV1050, LATVIA • PHONE +371 7222415 • FAX+371 7213992

D/120360

ECVET :

① Envoyer à EAC pour haute-ment avec les autres ré-penser à la consultation jubilee.

② Clôturer avec message de l'etion fait  
Riga, April 17, 2007  
No. 1-11/2592

③ Copie dossier ECVET

Mr Jan Figel  
EUROPEAN COMMISSION  
B- 1049 Brussels  
Belgium

**Subject: Results of Latvian national consultation process regarding European Commission staff working document "European Credit system for Vocational Education and Training"**

Dear Mr. Figel,

Thank you very much for your letter dated 1<sup>st</sup> December, 2006 and given possibility to take part in the consultation process on European Commission staff working document "European Credit system for Vocational Education and Training".

I have a pleasure to inform that Latvian national consultation process regarding European Commission staff working document "European Credit system for Vocational Education and Training" has been concluded.

On behalf of the Ministry of Education and Science of the Republic of Latvia and me personally I would like to renew to European Commission the assurance of the highest consideration.

Yours faithfully,

Professor Baiba Rivža,  
Minister

**Opinions acquired and compiled during the Latvian national consultation process regarding European Commission staff working document *European Credit system for Vocational Education and Training***

During the initial part of the Latvian national consultation process the authorities involved, including social partners, were informed regarding the Consultation process document prepared by the European Commission “European Credit system for Vocational Education and Training”, as well as the information regarding the course of the national consultation process and the Consultation document prepared by the European Commission has been placed on the official Internet home page of the Ministry of Education and Science of the Republic of Latvia. Within the framework of the consultation process “European Credit system for Vocational Education and Training” the parties interested in these matters could send their opinions in writing by post or by electronic means, as well as the closing activity took place in the Ministry of Education and Science on 21 March 2007 where there was a possibility to consider ECVET again in the form of presentations and discussions.

Altogether the following authorities have participated in national consultations regarding the working document “European Credit system for Vocational Education and Training” prepared by the European Commission: the Ministry of Education and Science, the Academic Information Centre (Latvian ENIC/NARIC), the Council of Higher Education, the Latvian Rector’s Council, the Employer’s Confederation of Latvia, the Colleges Association of Latvia, the Vocational Education Administration, the Free Trade Union Confederation of Latvia, Education and Science Workers Trade Union of Latvia. Issues for discussion have been discussed also within the framework of several instruments created in Latvia in co-operation with social and co-operation partners, for example, in the Vocational Education and Employment Tripartite Co-operation Sub-council, Regional Vocational Education and Employment Councils, in the group for development of Vocational Education Law, in the working parties of the national programme “Development of Single Methodology for Enhancing of Vocational Education Quality” co-financed by the EU Structural Funds.

**Joint position:** Latvia supports the idea of establishing the credit point system for vocational education. The positions of the document that vocational education credit points like the ECTS system for higher education are to be associated with learning outcomes, which, in their turn, are to be expressed in the form of knowledge, skills and competence, shall also be supported. It is foreseeable that the introduction of ECVET in the formal vocational education system in Latvia will not cause large problems; the greatest challenge for the situation in Latvia is to get validation of the knowledge and skills acquired in informal education for the development of vocational qualification using criteria equal to formal vocational education, including the use of ECVET.

The proposed system for the validation of the European vocational education and training can provide essential mobility possibilities to the citizens of EU member states for the acquiring and improvement of vocational qualification, official and practical validation of

lifelong learning principles, comparability and simple transparency of vocational qualification requirements, if this offer is substantially improved in several directions which have been indicated by the participants of the Latvian consultation process and which are explained in this document.

Although the introduction of the ECVET single criteria would be an essential benefit in the process of vocational qualification acquisition and improvement validation, in order that the citizens of EU Member States could successfully use the rights and possibilities of free movement of labour force, prior to the commencement of ECVET implementation it shall be necessary to develop in a more detailed way, explain and provide detailed guidelines for the introduction of the ECVET system described in the European Commission working document, paying special attention to:

- the unambiguous definition of one ECVET credit point;
- the criteria for the allocation of credit points and the type, in which they will be related to EQF levels;
- the period of time for the introduction and the fields, where ECVET will function;
- the development of the guidelines at the European level for the introduction of ECVET and development of methodology at the national level for use of ECVET; and
- interaction of ECVET and ECTS and relationship of ECVET with higher education.

Upon commencement of the introduction of the ECVET system at the current degree of readiness, there are serious risks that its interpretation in each state or even sector would be different and as a result instead of greater transparency greater mutual incomprehension would arise at the European level.

Conclusions, comments and recommendations obtained as a result of consultations are explained in succession in the following sections by focussing on each of the above mentioned problem issue in a more detailed way.

#### ***The purpose of and reasons for ECVET***

- Are the most important objectives and functions of the European system of credits for vocational training and education and the role of the competent authorities fully outlined in the consultation document of the European Commission?
- What would be the main added value of the planned ECVET system?

The most important objectives and functions of the European system of credit points for vocational training and education and the role of the competent authorities are fully outlined in the consultation document of the European Commission.

The main added value of the planned ECVET system is evaluation of learning outcome and validation in other states, in transferring from the vocational education system to another education system or from a non-formal education system to a formal education system, in order to use ECVET as the single information exchange instrument especially within the context of transnational mobility regardless of whether the education obtained is formal or non-formal.

The introduction of ECVET will be effective and promote easier validation of a qualification, which has been acquired in one EU Member State, in another Member State provided that the national qualifications frameworks, which indicate the position of national

qualifications in the European qualifications framework, are established at the same time as ECVET in all Member States. As it is possible to acquire vocational qualifications in different levels, it is likely that mutual validation will be possible only at one level of ECVET. The additional added value in such cases may be also the evaluation of education acquired previously, which is an important aspect for the implementation of mobility of EU citizens for educational purposes.

***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?
- Do ECVET's technical specifications take sufficient account of the evaluation, validation, recognition, accumulation and transfer of learning outcomes in respect of formal, non-formal or informal education?
- Is the allocation of credit points to qualifications and units of a reference figure of 120 credit points sufficient to ensure the convergence of approaches and the coherence of the system at the European level?

More detailed explanation of the technical specifications of this initiative is required for the practical introduction of ECVET. First of all, it is not clear from the document prepared by the European Commission, why the authors of ECVET have chosen an amount of credit points different from that of the ECTS system in higher education. The amount of one-year full-time studies/training in higher education is 60 ECTS credit points, but the amount offered in the ECVET system – 120 credit points.

If ECVET, however, keeps 120 credit points, it is necessary to clarify:

- whether the number of credit points in the amount of 120 points will be granted to each qualification level separately; or
- whether a specific number of credit points will be granted for each qualification level and summing up these levels the total amount will be 120 credit points.

Secondly, prior to the introduction of ECVET the Member States shall agree on the definition of one ECVET. The variant offered in the document, that 120 ECVET credits conform with the learning outcomes of one year in formal education in full time studies on average, is too difficult and imprecise, taking into account that many vocational education programmes are shorter than one year or they include a part of general education. The value of one ECVET credit may be defined as the learning achievement (amount of knowledge, skills, competence), which a person may acquire by basic education (Forms 9-10) within “nn” lessons by learning purposefully.

### ***Implementing of ECVET***

- Under what conditions the described qualifications in terms of learning outcomes and expressing them in units could effectively improve the transparency of qualifications and contribute to the development of mutual trust?
- Which criteria or combinations of criteria for allocating credit points could be selected and used?
- Are there any features in the qualifications system, which would favour the introduction of ECVET?
- How and within what timeframe could ECVET be implemented in your country?

In order that it could be possible to consider effective enhancement for the transparency of qualifications and facilitate the development of mutual trust, it is necessary to agree at the level of European countries, because it is not clear enough, whether there will be eight qualification levels specified as it is intended in the framework. The document says, (1. Why ECVET?), that “the actual implementation of ECVET should be based on common reference levels proposed by the EQF”. At the same time there are no indications, how these credit points shall be associated with qualifications framework levels. Of the EQF eight levels the first four levels are secondary vocational education levels. There are also no indications in the document, whether the levels will characterise credit points too. If not, then it is hard to understand, how the requirement to associate the implementation of ECVET with EQF is to be fulfilled. If levels are allocated to credit points, then one of at least two solutions shall be chosen – to associate credit points with the qualification level to be acquired as a final result (in vocational education 1-4) or to adjust the level for each programme component and specify how many credit points of each level a certain qualification will include. Each approach causes different questions the answer to which shall be found prior to the commencement of the introduction of credit points.

If the amount of a credit point of the higher education in the ECTS system is associated with the load of student studies, then in the document regarding ECVET (2.3.2 „Allocation of ECVET Credit points”) it is said that “ECVET credit points should be allocated on the basis of criteria such as:

- an estimation of the importance of the contents of each unit defined in terms of knowledge, skills and competence;
- reference to real or notional average length of programme;
- real or notional learner workload in a formal learning context;
- real or notional learner effort in an informal learning context;
- combination of several criteria.”

This formulation poses several questions to which the answers should be provided prior to proceeding further with the project:

- if the importance of study results matters, does it mean that with the same study load “more important” skills and competence will provide more credit points?
- the length of the programme and students workload are two different dimensions, credit points may be associated by one or another, but not both;
- have the authors given thought to the fact that student workload in acquiring the same study results in formal and non-formal education form would be different?

It is more difficult to understand how it is possible to combine these different criteria without losing the unambiguity of the credit point concept. Taking into account all of the above mentioned, we consider that the acquired knowledge, skills and competence shall be chosen and used as the criterion for the allocation of credit points.

In order to ensure the real operation of ECVET, all Member States, which voluntarily agree to implement ECVET, must define the term and fields of implementation, where ECVET will function. It was emphasised several times during consultations, that the use of ECVET in levels 1-4 of vocational education, i.e. up to higher education, is clear and comprehensible. In its turn, in higher education the ECTS system has already been introduced which is reflected also in the Annex to the diploma of higher education, therefore additional information regarding the effect of ECVET on higher vocational education is necessary.

In respect to the implementation possibilities of the ECVET system in Latvia, the participants of consultations indicated that for the introduction of a credit points system in the vocational education of Latvia, first of all, changes in legislation are required; secondly, as the ECVET definition is not clear at this moment and educational programmes created of modules do not exist in the vocational education of Latvia, it would be advisable for Latvia to participate in the last phase of the “widespread introduction”. On the basis of the information available in this phase of development, the introduction of ECVET in Latvia could be planned indicatively in 2010.

#### ***Measures for supporting the implementation and development of ECVET***

- What kind of measures should be taken at the European, national and sectoral levels to facilitate the implementation of ECVET?
- What documents, manuals and guidelines could be developed to facilitate the implementation of ECVET?

First of all, it would be necessary to develop guidelines for the introduction of ECVET at the European level in order to strengthen common principles in accordance with which the Member States may commence the implementation of ECVET. Secondly, the methodology for the use of ECVET would be developed at the national level where it would be possible to explain more precisely the use of ECVET in the vocational education system of each Member State. Participants of consultations have especially stressed that in the case of Latvia in order to facilitate the introduction of ECVET at the national level, it would be necessary to develop a validation system of non-formal education and make the relevant amendments to the Vocational Education Law.

#### ***ECVET's potential for enhancing mobility***

- To what extent and how will ECVET be able to develop international and national co-operation?
- To what extent and how will ECVET be able to help to improve the quality of Community programmes on mobility and participation in these programmes?
- To what extent and how ECVET and Europass could complement each other in order to enhance mobility?

The direct effect of ECVET on the enhancement of mobility in this phase of ECVET development is not possible to foresee, as well as on the development of international co-translation © 2007 Tulkošanas un terminoloģijas centrs (Translation and Terminology Centre) 5

operation and national co-operation in the field of vocational education and on the quality of mobility programmes. Participants of consultations have assessed ECVET indicatively as one of possible mobility support instruments, at the same time indicating several raised questions to which the document drawn up by the European Commission does not provide the answers. For example, in respect to the action programme of the European Union in the field of lifelong learning, at present the ECVET project provides for the use of credit points in both the Leonardo da Vinci programme and Erasmus programme. As there is no more detailed information regarding the methodology for use, then within the scope of the Erasmus programme confusion may arise – which credit points apply to mobility – ECVET or ECTS? To our mind, it is also necessary to discuss these matters at the European conference, which will take place in June 2007 and conclude the consultation process.

Latvia thinks that the Europass documents shall be used in order to provide information in an illustrative way regarding the competence, quality and ensuring of the transparency of qualifications; therefore, they might facilitate also the use of ECVET, using ECVET credits in attestation of Europass mobility. It would not be a problem in Latvia to introduce an ECVET section in the Annex to the document approving the Europass qualification, as the system for issuing of this document is still being created. At the same time, the consultations regarding the interaction of these two instruments shall be continued, because the present offer indicates only the clear possibility to use ECVET in the Europass mobility attestation; in its turn, such possibility is not clearly indicated in the Annex to the documents approving the qualification.

