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Consultative Statement regarding the Commission Staff working Document relating to the European Credit System for Vocational Training and Education (ECVET) – A system for the transfer, accumulation and recognition of learning outcomes in Europe.

1. Introduction

The Confederation of Norwegian Enterprise (NHO) would like to comment on the above-mentioned matter.

First, the NHO would like to express our discontent relating to the fact that we feel that the Norwegian Ministry of Education and Research should have submitted the Commission Staff Working Document to a broader range of interested parties, and also with regard to the fact that the Ministry set such a short deadline for submitting comments in a matter of such importance.

As an opening remark, we would also like to state that the Commission Staff Working Document is unclear in many areas, and therefore difficult to comment on.

Key points in our statement:

- The NHO approves the initiative designed to promote greater mobility in the European labour and education market.
- We find it hard to envision how a European credit system can be made practical in practice. We foresee huge, time-consuming and technical challenges.
- We are concerned that the system may require the construction of an extensive bureaucracy as a prerequisite for running this type of system.
- The NHO holds the opinion that systems should be developed for the verification and recognition of accumulated/sparse competence by means of theoretical and practical tests to be evaluated in accordance with nationally defined standards.
- The further development process should take place in the form of national pilots involving the most important actors within Norwegian vocational training and education.

2. The Consultation Process

In the opinion of the NHO, this is a highly important matter, both from an occupational as well as from an educational policy point of view, for all those who play an active role in upper secondary education and vocational training in Norway.

The NHO is therefore somewhat surprised that neither NHO's central organisation, nor our affiliated sectoral federations were invited to submit consultative statements to the Norwegian Ministry of Education and Research in this matter.

If the Ministry's reasons for not consulting the NHO involve referring to the National Council for Vocational Education and Training (SRY) as a consultative body, we would protest vehemently against this. In matters directly concerning the sectors and trades, it is a prerequisite that we, as an employer's organisation, get heard. The responsibilities that the NHO has in relation to vocational training in Norway should grant us the right to be heard in important educational policy matters.

The Need for a Broad Consultation Process

In this matter, the NHO finds it natural for the Ministry of Education and Research to determine the place of the technical school in a possible future ECVET system. As the technical schools currently has been granted equal status to that of higher education, i.e. that of university college and university education – in other words above upper secondary level, it is unclear whether the technical schools are to be included in the ECVET system. This is unfortunate in NHO's view, since it is especially important to consider a credit transfer system for this particular educational pathway which serves to link the technical schools to both upper secondary education and higher education.

3. The Consultation Document

The Consultation Document presented by the Commission represents an important contribution to the further efforts to stimulate to increased mobility within the European labour and education markets. From NHO's point of view it is important to work goal-oriented with this issue.

Systems for documentation and recognition of competence undoubtedly represent key means, but the prerequisite for making such schemes work is that the documentation is easy to bring along into another Member State, and that credits are being granted on the basis thereof by the recipient Member State.

On some of the key points, the NHO finds the Consultation Document to be too imprecise, and therefore difficult to use as a basis for responding to the question being asked therein.

There are different ways to read this Document. The way it is written suggests that it should be used as a concrete and authoritative proposal where the effort should be put into interpreting and elaborating on its ambiguities. Another approach is to regard it as an example and discuss its objectives of this effort more freely in relation to the Document.

NHO's work in relation to this consultative process contains clear elements of both these approaches. In our discussions on potential gain of such a proposal, this doubleness became evident.

The proposal for a credit transfer system is too unclear for us to see that it would have any clear added value for employers. Strong concerns has been voiced within the NHO relating to the fact that the costs involved in the development of this type of system and the apparatus required to run it, would exceed the benefits gained from it.

In the same way, comments have been brought forward stating that it is felt to be unsatisfactory to bind so many resources to the development of a system that seems rudimentary and one that lacks a sound national anchorage. This feels like being assigned an additional task which ties up resources which could have been utilised in other ways.

The objective is important

We do however feel that the objective is important and that it is feasible to develop a system which can contribute to attaining these goals. Such systems must be developed from below, be anchored on national level and where owners and users of the different trades, courses and subjects are the key developers of this system. This should be bodies such as sectoral federations, trade organisations, representatives from the individual trade, course or subject etc.

In our effort relating to the implementation and running of the system, it would be useful to include the four bodies: the National Council for Vocational Education and Training (SRY), vocational and educational training councils, county vocational training boards, and examination boards be relevant cooperation partners. These are cooperation bodies which the NHO and our member organisations trust in our effort concerning educational issues.

The NHO holds the opinion that any further effort must be founded on national pilot projects based on existing systems. It would be unfavourable to tie oneself down prematurely to a European model.

A new system must be founded on the existing one

The NHO is of the opinion that we already have access to interesting elements for such a nationally anchored development effort. We have come far in our effort relating to documentation and recognition of non-formal competence. As part of this effort, good models have been developed for so-called vocational testing, which in combination with personal documentation (portfolio) and interviews provides a good basis for the recognition of competence.

The Norwegian tradition of using examinations and examination boards would also be a vital source of experience and methods which would be beneficial in this type of evaluation.

Several sources have also pointed to our long-term participation in World Skills and assessment methods that have been developed for this event.

The NHO believes that it is necessary to use the time needed to develop national pilots and to gain sufficient experience before a European can and should be born.

We cannot see that this is realistic within the framework of the Lisbon Process (2010).

The NHO is positive to the implementation of national pilot projects within the framework of the Leonardo da Vinci Programme and we would like to encourage the Commission to consider further stimulation of national and multi-national projects.

4. Our views on individual aspects of the Consultation Document

Altering attitudes is Important

We support the views expressed under paragraph 1.0. The NHO agrees with the Commission that the mobility within the European labour and education markets are too low, and we will support any measures designed to strengthen this mobility. One of the obvious problems which must be tackled in order to achieve this, are the various forms of “protectionism” which in different ways and to a varying degree come into play in this area. It is vital to make a determined effort with regard to the issue of mutual recognition while simultaneously making an effort to develop systems which makes it possible to transfer competence across national borders. Systems are important, but will not have the desired effect without an attitude of acceptance in the recipient Member State along with a reduction of barriers.

The life-long learning perspective requires coordination

This aspect points to a significant challenge for the further development process related to this effort. Without a clear coordination of credit transfer systems between upper secondary education, the training and education offered by the technical schools and the higher education system, we will not be able to achieve these objectives.

We would also like to express great humility with regard to the considerable technical challenges presented by the development of a system of this kind based on learning outcomes. Questions linked to the principles for the accumulation of credits, the quality assurance for this type of system and especially the practical implementation and running of such a system are complicated and require thorough testing.

Levels will have to be linked to national standards

A learning outcome which has not been defined and credited in relation to a fixed reference point is an impossibility in our opinion. It is the fixed reference points which have been defined and quality assured nationally and given the status of completed training or degree, which must be the benchmark here. It must be the “owners” and users of a trade, subject or course which must be given the responsibility of stipulating a framework for determining who shall be entitled to award credits, how to correctly award credits and determining how many credits the different levels are worth.

With regard to ECVET, as a carrier of information on accumulated learning outcomes on European level, it will be essential for a practicable system that it is viewed in conjunction with other systems. Adjusting the new system in accordance with the European Qualifications Framework and the EQF levels developed here are essential. ECVET’s user interface to EUROPASS represents another vital point.

Too much or too little information

In addition to these Community initiated systems, a number of documentation systems have already been established, and these systems must find their place within the ECVET system. Paragraph 1.4 and 1.5 deals with one of the greatest methodical challenges which need to be solve in order for the system to work. The dilemma we must find a solution to is how to: a) avoid developing a credit system that is so simple that no one will use it due to the fact that it contains too little and poor information and has poor legitimacy; and b) a documentation system that is so thorough and elaborate that people will refrain from using it because of its extensiveness.

The challenge here is to achieve the right balance in relation to the objectives and the different user groups. This can only be done trough testing and the gathering of experience. Mutual trust constitutes a decisive factor for success in this regard.

The method is good provided it works

Chapter 2 of the Consultation Document provides a comprehensive review of what ECVET shall be, and the description, such as it stands, is unchallengeable, given the prerequisite that it can be realised in line with the pre-conditions drawn up in the Document. We have no doubt that both Martin and Marie will derive great benefits from this type of system, provided that it exists, that it works, has legitimacy and has been organised and financed in a sound manner. This will also be dependent on whether or not enterprises find it useful and attractive to utilise this type of remodelled system.

Our introductory remarks already state our support for the stipulated needs and objectives whist expressing uncertainty as to whether we can see any solutions in this Document.

One example from the Document where the text fails to provide or point to a solution is the discussion relating to the so-called units. As a theoretical description it is interesting and easy to approve, but there are however a number of political, technical and practical problems involved in the development of a system designed to break down competencies into units and award credits on the basis of this.

Learning through work and recognition

Within Norwegian vocational training and education, we have paid special attention to the development of a training model in which the enterprises take on a committed role in relation to a 4-year training programme where the last two years is spent entirely on working in the enterprise. When we are faced with the task of breaking down learning elements which has not been formulated as part of a curriculum, but that are action-oriented, and thus to a lesser extent expressed through language, we foresee significant challenges relating to breaking this down into so-called units. This relates to both the technical description, the decision concerning who is to be responsible, and how this is to be quality assured as well as how to award credits and give the scheme its legitimacy.

As regards the other chapters of the Consultation Document, we feel that this has been adequately dealt with in the introduction.

Yours Sincerely
THE CONFEDERATION OF NORWEGIAN ENTERPRISE (NHO)

Ms Sigrun Vågeng
Director of Labour Market Policy and Social Affairs