



Permanente Vertegenwoordiging van het
Koninkrijk der Nederlanden

European Commission
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Dear Mr. Figel',

As attachment you will find a letter of the State Secretary for Education, Culture and Science of the Netherlands, Ms. Marja van Bijsterveldt- Vliegenthart, regarding the results of the national consultation on ECVET.

I kindly refer you to its content.

Kind regards,


Rinette Julicher, PhD,MPA

Counsellor
Education, Culture & Audiovisual Affairs
Permanent Representation of the Netherlands to the EU

O N D E R
U C S J M
L T U U R
N E T E M
S C H A P

Mr Ján Figel'
Member of the European Commission

The Hague

Ref.

Your letter of

Your reference

Subject

European Credit System for VET

Appendix

Results of the national consultation

Dear Mr Figel,

In your letter of 1 December 2006 (reference *DH-cl D (2006) D-1477*), you have asked me to organise a national consultation on the European Commission's proposal for a European Credit System for Vocational Education and Training (ECVET). This consultation has taken place in the Netherlands over the past few months. During the consultation, attended by representatives of educational institutes, organisations for employers and employees, sectoral organisations and experts in the field of education and employment, I did manage to obtain answers to the questions that you raised. You will find the answers in the appendix.

On the basis of these answers, I conclude that the organisations involved in secondary vocational education and training (VET) subscribe in full to the goals ECVET is seeking to achieve. The ambition to create more mobility in the European educational- and labour market will benefit from a greater transparency in the qualification structures and educational systems across Europe.

But, in addition to the questions in the consultation document, a surprisingly large number of respondents address the question of whether ECVET is the appropriate tool for achieving these goals. The responses were very divergent. Only one or two organisations accept or reject the proposed system outright. The majority of respondents doubt whether these set goals can be met using the instrument ECVET as is described in the consultation document. The practical problems involved in defining equivalent occupational units at European level, the linking of ECVET credit points with learning outcomes and the administrative burden that the full-scale implementation of ECVET may imply, serve only to reinforce these doubts.

The majority of respondents do, however, see possibilities for an adapted version of ECVET and formulate recommendations for adapting it. Below, I will briefly explain these recommendations who strongly resemble the results of the EQF consultation.

1. Dutch organisations in the field of secondary vocational education and training first and foremost stress the importance of developing ECVET to better harmonise with EQF and Europass. The clear and obvious link between these tools has not yet been fully explained. I myself strongly endorse this recommendation.

2. Respondents stress that mutual trust in Europe regarding the allocation of credit points is a key condition for the correct use of the ECVET tool. I advise the commission to include the experiences gained in higher education with ECTS in the further development of ECVET, not least because of the intrinsic and organisational differences there are between ECTS and ECVET.
3. ECVET has put the discussion about content and description of occupations on the European agenda far more emphatically than was previously the case. In my opinion a good thing. The first steps towards a European qualification structure (possibly for a part of the occupations at VET-level) are considered the most important added value of ECVET, though these steps should, in my view, not lead to discussions about the principle of sovereignty. Qualification structures are primarily the responsibility of the member states. The Netherlands has made considerable efforts to develop a qualification structure for the secondary vocational education and training sector that is also identifiable and comprehensible for the business community. Relevance for the labour market is an aspect I would like to see more reflected in ECVET.
4. In addition to transparency in the content of occupations and vocational training, respondents see a general agreement on the foundations and procedures for identifying and evaluating individual learning results as a necessary condition for the successful performance of ECVET. The Netherlands has gained good experiences with procedures for the accreditation of prior learning ('APL procedures') but I do note, however, that in this matter trust and joint agreements have to evolve. The recently agreed national 'Quality Code for the Accreditation of Prior Learning' is, I believe, a significant step forward towards assuring the quality of such procedures. I advise the commission to study whether and how a similar code might be integrated into European policy.

With the above findings as a backdrop, I would like to make the following recommendations:

- o Set aside enough time to prepare ECVET. The implementation of the European Qualification Framework is currently in full progress and is conditional to the successful development of ECVET.
- o Ensure that the further elaboration of ECVET does not become an 'academic exercise'. The description of the foundations and procedures of a potential VET credit point system requires careful testing. In consequence, the European Commission should make time and funds available to support ECVET pilot projects that focus on the development of relevant practical knowledge and experience.

The answers to the questions raised in the consultation document are included in the Appendix. I would like to take this opportunity to wish you every success with the processing of the results of the European-wide consultation process and look forward to examine the adjusted proposal.

Yours sincerely,



State Secretary for Education, Culture and Science

also on behalf of the Minister for Agriculture, Nature and Food Quality, G. Verburg

Results of Dutch EVET consultation

Appendix

1. Summary of Dutch ECVET consultation

<p>Strengths</p> <ul style="list-style-type: none"> • An (adapted) ECVET can ensure that agreement is reached on the recognition of learning outcomes. • The ECVET puts content of occupations on the European agenda. • More transparency of VET in Europe for education and business communities with an (adapted) ECVET. • ECVET can be implemented in phases, first in sectors with a traditionally international orientation. • The system may enable 'stacking' of formal, non-formal and informal learning outcomes. • The proposal opens opportunities for embedding the system and adapting it to national frameworks. 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Consequences of freedom to specify credit points are unclear. • An automatic translation of 'sections of the occupation' into 'sections of the education programme' is not self-evident. • There are overall doubts as to the effectiveness of the ECVET design put forward for consultation. • The cohesion with EQF, Europass and the ECTS is still unclear. • It is not clear yet how the learning outcomes should be defined. • It is not clear yet how credit points are linked to learning outcomes. • It is not clear yet how numbers of ECVET credit points relate to numbers at ECTS.
<p>Opportunities</p> <ul style="list-style-type: none"> • Recognition of endeavours towards internationalisation in education and job market. • Broad acceptance of goals of the tool ECVET. • Mobility is still low so there is plenty of scope for improvement. • ECVET creates opportunities for promoting the use of APL procedures at European level. • Stakeholders see possibilities for applying and elaborating the proposal for an ECVET in pilot schemes. • Proposal affords opportunity for extending existing international co-operation initiatives. • Opportunity to stimulate actual partnerships between educational institutions and sectors. • A mature ECVET makes subsidising individual learning activities possible, also outside of workplace training schemes. • The Netherlands is currently working on a new performance-related qualification system for VET, which will enable it to anticipate European developments. • Chance to use lessons learned when developing the ECTS. • Good response to consultations indicates organisations' commitment 	<p>Threats</p> <ul style="list-style-type: none"> • An explicit implementation roadmap for the way in which the EC intends to encourage the internationalisation of VET in Europe is lacking. • There are several diverse reasons for low mobility on which the ECVET has no impact. • Without a European qualification system, the ECVET can never be better than the national qualification systems on which it is based, and the quality of these systems differs greatly. • When defining learning outcomes, using the term 'competences' would seem obvious. However, there is still much confusion about the use of this term in practice. • There are serious doubts with regard to the practical feasibility of a valid credit point system that is supported Europe-wide. • The proposed idea of 'units' is not or no longer in agreement with the Dutch qualification structure, which has just done away with these units. • Mutual trust is a necessary condition for rather than a result of successful implementation. • Employers are worried that the system will be detrimental to flexibility at national and regional levels. • Organisations fear a large increase in administrative work. • The target group is limited, which reduces the effect of the efforts required for implementation. • Knowledge of various national education and qualification systems needed to use ECVET as a tool is lacking among stakeholders.

2. The purpose of and reasons for an ECVET system

All respondents subscribe to the goals ECVET is designed to achieve. In that context, several respondents wondered whether ECVET is indeed the appropriate tool for realising these goals. Opinions differ greatly on that matter; only one or two organisations actually accept or reject the proposed system outright. **The majority of respondents doubt whether these set goals can be met using ECVET as it is described in the consultation document.** The practical problems associated with linking ECVET credit points with learning outcomes and the administrative burden that ECVET may bring with it serves only to reinforce these doubts.

It has been pointed out on several occasions that measures for promoting international mobility in work and vocational education and training (VET) target only a very small group. **Moreover, various respondents stress that a package of measures is needed to promote this type of mobility.** In addition to tools such as EQF, Europass and ECVET, attention should be directed towards solving practical constraints in the sphere of 'derived factors' such as language skills and remuneration differences. Also needed are measures that are geared towards kindling more enthusiasm for international co-operation in work and learning at senior secondary education level in a more general sense.

Notwithstanding the doubts and qualifications reported above, most respondents acknowledge the added value of an – adapted – ECVET. **Many organisations consider the implementation of ECVET not so much a goal in itself as a way of taking a number of key steps towards achieving the intended goals.** It has quite often been pointed out that discussions about the content of occupations should be initiated at a European level, with a view to creating, in the long term, a Europe-wide qualification structure based on learning outcomes. Another key element is the establishment of a European approach towards evaluating and recognising learning outcomes. **It would seem that with a (European) qualification structure based on learning outcomes and a (European) approach to the evaluation and recognition of the learning outcomes, respondents generally consider themselves well-equipped to link learning in various contexts,** whether this involves formal, non-formal or informal learning, at VET- or higher levels, and irrespective of the differences between countries and sectors.

3. The technical basis for ECVET

A normal distribution is also apparent in the answers to the questions concerning the technical basis of ECVET. Only few respondents thought that technical specifications in the consultation document were already sufficiently detailed to allow the system to be implemented. And only few considered the technical basis of the system to be so substandard as to reject the proposal outright for that reason alone. **The majority of the respondents favour a substantial reorientation of the technical foundations.**

It goes without saying that this reorientation corresponds to the starting points given above:

- **Greater focus on the content of occupations and the description of learning outcomes.** This description would have to be meaningful for vocational education and occupational practice alike. Confusion with regard to the content of learning outcomes would most certainly not be in the interests of the trust and co-operation envisaged. When adopting the content of learning outcomes, care will have to be taken to ensure that this does not limit the possibilities of adapting education to the changing needs of occupational practice.
- **Greater focus on the way in which learning outcomes are evaluated and recognised.** For this, experiences such as those gained in the development of (a quality system of) accreditation of prior learning (APL) procedures. Various respondents indicate that they consider these specific APL-like aspects of ECVET the most essential elements.

In addition, respondents repeatedly indicate that ECVET's cohesion or potential cohesion with the EQF, Europass and the ECTS is insufficiently demonstrated in the technical foundations contained in the consultation document.

The cohesion with the ECTS, or rather **the lack of cohesion, is cited as a potential constraint to implementation.** In many European countries, including the Netherlands, VET is, more often than not, no form of final education. The relationship with the point system for higher education is therefore crucial.

On the basis of this national consultation, it is impossible to show unequivocally how best to tackle this constraint, because **one of the key outcomes of this consultation has surely to be that the opinions among stakeholders as to the desirability and practical feasibility of an ECVET points system are very divided.**

Only few respondents regard ECVET points as the mainstay of the ECVET system or feel that the consultation document has shown clearly enough how credit points can be allocated. There are also respondents who assume that pilot projects will show clearly enough how credit points can be allocated to learning outcomes. Finally, there are also respondents who consider these credit points the Achilles heel of the ECVET system. They draw attention to the fact that in the light of the heterogeneity of the student population in senior secondary vocation education, it will be very difficult, if not impossible, to establish a relationship between study length and qualification gains.

Several respondents suggest basing ECVET points not on study length but on the relative importance with regard to the total final qualification, the more so because the reference standard of 120 points is said not to be in line with Dutch educational practice.

4. Implementing ECVET

Respondents with a positive or moderately positive attitude towards an ECVET system, often in an adapted form, name several conditions under which the description of qualifications as learning

outcomes and their expression as units would effectively improve the transparency of the qualifications and contribute to the development of mutual trust.

The link with the national qualification structure in particular is seen as being of great importance. In the Netherlands, the qualification structure is based on professional competence profiles that describe occupations in terms of core tasks and work processes. **Various respondents stress the importance of the relevance of these vocational descriptions for the job market.**

As regards the development of mutual trust, the respondents note that trust should not be seen so much as the result of ECVET but rather as a precondition for a successful implementation. Several players point out that time and space are needed to build trust and that trust is indeed something that can be encouraged. **Respondents indicate a need for information about educational systems, programmes and providers in the various countries.** Moreover, the European Commission could step up its support of concrete forms of co-operation.

The consultation has shown that the credit points are the most contentious part of ECVET, as described above in section 3. As a result, the answers to the question of which criteria or combinations of criteria should be used for allocating credit points are very divergent. **However, most respondents agree that the method used to link credit points to learning outcomes should be absolutely clear.** A good few respondents warn explicitly that lack of clarity on this issue could rapidly undermine mutual trust.

Considerable importance is attached to pilot projects for the implementation of ECVET. Respondents also note that the EQF should be implemented ahead of ECVET and that the redesign of the national qualification structure should be more advanced. Many also observed that prior to implementation, it must also be clear how tasks and responsibilities are distributed in the Netherlands.

Another suggestion in this respect is not to opt for a broad rollout of ECVET but instead to start with those occupations and training courses that are of an essentially international character.

Only a few respondents express an opinion about the timeframe within which ECVET can be introduced in the Netherlands. A period of three to five years is suggested.

5. Measure for supporting the implementation and development of ECVET

On the whole, respondents with positive or moderately positive views about an ECVET, that has, in most cases, been adapted, agree about the best way of facilitating the implementation and development of ECVET. **The ideas are based not so much on documents, manuals and guides as on measures with the potential to create concrete interaction between the stakeholders.** Alongside ECVET pilot projects that have already been announced and ongoing

programmes, respondents are in favour of supporting individual learning experiences abroad, in the broadest sense of the word.

The need for a basic general knowledge of the education and qualification systems in the various European countries is also identified. This would include brief descriptions of education systems, an overview of how responsibilities are distributed and information about study opportunities and international workplace training.

As regards the ECVET system itself, the following measures would facilitate implementation:

- national and European qualification profiles based on (units of) learning outcomes;
- scripts for each country showing how partnerships, letters of intent and learning agreements could be framed;
- minimum quality requirements for the registration of intended learning outcomes, assessment criteria and ways of reporting on the assessments conducted as well as the corresponding results.

6. ECVET's potential for enhancing mobility

Besides the divergent interpretation of ECVET in general, opinions regarding its potential to contribute to the promotion of mobility also vary considerably. **Respondents with positive or moderately positive views about an ECVET, that has, in most cases, been adapted, do undeniably recognise potential.** Some organisations point out that to reap benefits in the long term, sizeable initial investments in ECVET will be needed in the short term.

Partnerships

Where the development of transnational and national partnerships is concerned, quite a few organisations indicate how important they consider **alignment with existing networks** when implementing ECVET, specifying in particular the National Reference Points (NRP) and the European contact points for recognising regulated careers.

ECVET should set out clearly which partners are sufficiently compatible, from which it would then soon become clear which partnerships would be productive. **A number of respondents state explicitly that the positive effects of ECVET on mobility are expected to be indirect and a matter for the long term, which is why ECVET should not be allowed to have an adverse effect on the specific encouragement of international co-operation in the short term.**

Mobility programmes

An adjusted and specifically defined ECVET could evolve into a quality hallmark for learning experiences abroad. This would serve to enhance the status of mobility programmes. A quality hallmark such as this would make it possible to subsidise almost all individual learning experiences abroad, alongside existing European programmes.

Relationship between ECVET and Europass

Only one organisation regards ECVET and Europass as two incommensurable units. The other organisations advocate far-reaching alignment. Some indicate explicitly that both tools would most certainly stand to gain from alignment. Diverse suggestions were put forward for this alignment, including:

- individual learning agreements and validated learning outcomes could be included in Europass;
- an unambiguous definition of learning outcomes would enhance transparency and hence the value of Europass;
- including in Europass all achieved and recognised learning outcomes, with a reference to the national and the European qualification framework (yet to be developed!), would be a good thing;
- ECVET points could be added to the Europass Mobility document;
- Including APL components in the Europass CV would enhance the value and relevance of this document for the labour market.