

Royal Ministry of Education and Research

EUROPEAN COMMISSION
Directorate- General for Education and Culture
1049 Brussels
Belgium

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Subject: Norwegian response to the national consultations on ECVET

Dear Sir/Madam,

The Norwegian Ministry of Education and Research agrees to the proposed intentions and purpose of the ECVET system and the objectives of ensuring mobility, greater transparency of cross-border vocational education and training and not at least to the opportunities ECVET gives for cooperation and mutual trust between different VET stakeholders across borders.

However, the framework and the practical content of the proposed ECVET system are too vaguely described to enable the stakeholders at this point to foresee the consequences which may arise in the long run. We find the questions posed in the consultation document too specific and concrete with regard to the proposed contents of the ECVET system. We, therefore, would like to make some general comments to the different categories of questions, and point out some important points for further discussions.

The Ministry's response is based on the Norwegian consultation process where all relevant stakeholders have been included. The comments from Norway are as follows:

1. The purpose of and reasons for an ECVET system

As mentioned in the introduction the Norwegian Ministry of Education and Research is positive towards the rationale and the overall purpose of the ECVET system. International mobility in VET and in a working life context is seen as crucial to the future economies of Europe. International mobility in education and training is an important element in building cultural and linguistic knowledge and competence in Europe. In addition to international

mobility of young persons involved in initial vocational education and training, the ECVET proposal should more clearly envisage such a system's possible future value as a communication tool for lifelong learning within national systems, especially with regard to the development of EQF, NQFs and lifelong learning strategies. This needs further description.

An important challenge to be addressed is how the proposed ECVET system should be able to deal both with the mobility needs of the formal education system and the need for mobility in the workforce. The document focuses mostly on formal education. It should be made clear that the system should open up for validation and recognition of informal and non-formal learning.

The heading purpose of and reasons for the ECVET system should include a clearly defined reference to the cultural and historical differences in Europe in the field of vocational education and training and underline its support to the diversity of the systems. The future work on ECVET should aim at supporting this diversity.

The social partners in Norway are somehow sceptic to the proposed system as it is found to encourage a process towards a European harmonisation and standardisation of the contents and education levels within vocational education and training. In line with the community goals on ensuring cultural and linguistic diversity, the proposed ECVET system and process would benefit from a clear reference to how different national systems, cultures and traditions within vocational education and training could be maintained within its framework.

The aim of facilitating the validation of informal and non-formal learning in the consultation document is not supported by significant objectives and suggestions as to how this can be fulfilled in reality. This would represent numerous technical challenges, and necessitates a more detailed set of descriptions and examples in order to support the implementation of the ECVET system.

When it comes to the aim of strengthening the transparency of qualifications/competencies we find it important to clarify how the ECVET system should be complementary to the European Qualifications Framework.

It is not a wish of the Norwegian stakeholders to enter a process towards a numerous set of qualifications (modules) with various units of learning outcomes. Our new education reform (2006) with a new curriculum has a holistic approach to competencies, expressed as learning outcomes, rather than qualifications divided into units. This was also pointed out in Norway's response to the consultation on EQF in January 2006 in which Norway asked for further work on terminology and definitions as this would be a condition for making it possible to validate learning outcomes towards the national curriculum.

We have further registered a concern related to the concept of basing comparisons of vocational qualifications solely on mutual trust. The ECVET system should propose more concretely the common basis for validation of vocational education and training between countries, underlining a strong objective to raise quality of the vocational education and training systems in different countries.

The description of the competent authorities as well as the intended competence and functions of these authorities is vague and general. ECVET might have a potential to simplify the bureaucracy, thus there is concern that the system proposed results in an even greater level of bureaucracy of the education and training systems. As the process of assessment, validation and recognition is described in the consultation document, it seems to be bureaucratic and complicated to manage. The process being divided in two parts, and between the sending and the receiving country, seems to necessitate double work for the educational authorities. The ECVET system should aim at being simple and accessible to relevant bodies. Norway will welcome a qualified and common tool which decreases the need for bureaucracy.

2. The technical basis for ECVET

There are uncertainties linked to the different processes of the proposed transaction (evaluation, validation, recognition, accumulation and transfer). The process of validation and recognition of learning outcomes obtained in another country represents various challenges. Norway finds it necessary that more developed and tested technical specifications are made, and will suggest to allow a longer piloting period and analysis before decisions are made on technical specifications.

The ECVET system depends on a great amount of work to develop and test alternative solutions that can be applied by several countries, not only bilaterally. The focus on bilateral partnership agreements only, may risk reducing artificially the wider scope of the European cooperation in the long run.

As already mentioned there is an uncertainty linked to the descriptions of qualifications, and the smaller units. The ongoing work on learning outcomes ought to be intensified as learning outcomes are presented as the backbone of all the proposed frameworks at European level. It was strongly underlined by the social partners in Norway that learning outcomes defined in national curricula for different VET courses should be the reference (benchmark) when recognising competencies/qualifications - regardless of how or where these competencies are attained.

Norway finds it positive that learning outcomes should be the basis for assignment of credit points. However, there is a strong need for clarification on how credit points in the ECVET system are intended to or could be related to learning outcomes and the levels in the EQF and the subsequent NQF systems. Credit points could also be a way to indicate the relative weight of a unit, and must not necessarily be an integrated part of a system for transferring learning outcomes. If credit points continue to be an integrated part of the ECVET system, it will also be necessary to test and clarify how VET credit points are to interact with study points from the ECTS and other credit point systems at national level.

3. Implementing ECVET

The Norwegian education and training system is an integrated system where general academic and vocational education and training is organised under the same umbrella (i.e. where IVT is part of the formal upper secondary education organised as two years in school and two years in an enterprise / training establishment leading to a “complete” vocational qualification). The

system is flexible as it allows for crossing from vocational to general education at certain stages; and furthermore the system allows admission to higher education from vocational education and training.

The new curriculum in Norway based on learning outcomes could be an advantage for a possible implementation of the ECVET system. However, the national curricula for different VET courses are not divided into units, in line with a holistic approach to education and training and qualifications. The ECVET system's focus on units may represent a challenge in this respect.

4. Measures for supporting the implementation and development of ECVET

Norway will suggest that the Commission allows for and initiates a programme of pilot projects, and invests in dissemination and valorisation activities in the long run. The future development of ECVET must be given the time necessary to assure a true and constructive stakeholder involvement in the process. A system of transfer of learning outcomes must be the final aim of the process, not necessarily the start of it.

Our conclusion is that the implementation of the ECVET - system, as presented in the consultation document, will be slightly premature without a strategic range of pilot projects that result in common guidelines/frameworks and common understanding on *all* the elements and processes that are to interact in such a complex system.

5. ECVETs potential for enhancing mobility

The ECVET system has a potential for increasing international mobility in VET. However, the ECVET system should be seen in a greater perspective, as there are several factors representing barriers to mobility in VET. These factors interact in different ways on different contexts. A functional ECVET system could reduce some barriers. It should also be taken into account that the learners involved in vocational education and training, both in initial vocational education and training and in a lifelong perspective, can be at significantly different stages in life, and can be more heterogeneously composed than other student groups.

It should also be taken into account that mobility in VET to a larger extent represents placements that are enterprise-oriented, thus being more challenging for young persons undergoing initial VET than placements in schools normally would be. We recommend more focus on the possible reasons for the relatively lower mobility rate in VET than in higher education and projects that involve relevant stakeholders to identify the potential for mobility in VET.

We would also like to stress the importance of funding of mobility activities in VET. The national objectives and funding possibilities vary, and it is important in this case to maintain and strengthen this funding at European level through e.g. the Lifelong Learning Programme, in order to give all participating countries a true potential to enhance mobility in their VET systems.

Conclusion

The Norwegian Ministry of Education and Research supports the overall aim of the ECVET system. However, there is a need for pilot projects within the formal education system before any further development and decisions on the ECVET system are taken. The results and evaluation of these will define the direction and content of the ECVET system. Future development should include all stakeholders and be based upon a common understanding of ECVET, – the system, the concepts, the definitions, the objectives.

Yours sincerely,

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