



PODPRESEDA VLÁDY
A MINISTER ŠKOLSTVA
SLOVENSKEJ REPUBLIKY
Ján Mikolaj

Bratislava, 30th of March 2007
No.: CD-2006-20415/46785-1:sekr.

CABINET FIGEL					
DK		A-1154			
16. 04. 2007					
JF	MA	MG	PC	DH	PJ
EW	BB	MS	MRM		Arch

Dear Commissioner,

In response to your request concerning the consultation process on the European Credit System for Vocational Education and Training (ECVET), I am sending you the statements to the consultation document. The wording of the answers to document questions is a result of nationwide expert consultations and will hopefully contribute to the facilitation of the transfer, validation and recognition of learning outcomes to the satisfaction of learners, as well as education providers.

Yours faithfully,

Ján Figel
Member of the European Commission

B-1049 Brussels
BELGIUM

Questions for the consultation process

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 document identifies the main objectives and the weight of the system; however, it is still necessary to work on the following:

- a) The appointment of competent bodies / institutions to co-ordinate the implementation of ECVET in the Slovak Republic, as well as to set up the methods and processes for the creation of the system
- b) The clarification of relations of the system to similar or associated systems (e. g. ECTS, EQF)
- c) The unification of terminology (primarily terms such as *qualification, the qualification standard, units of qualification, etc.*), due to the generality and the ambiguity of the terms used
- d) The specification of the education-systems' interconnection, so far as the document in this extent does not deal with the specifics (the problem of discrepancy) of the education systems in Europe
- e) The uncertainty, who and in what way resolves the reference of formal and non-formal education.

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

We identify following positive aspects of the possible system implementation the most common:

- a) Making the educational offer transparent, legible, effective and accessible to participants on the part of learners as well as providers, and thus strengthening mobility; better orientation in qualification systems and results. However, just to round out, the simplicity and applicability of the system, ranking among the main advantages to be brought to the learning society, is depending on a startling number of diverse factors.
- b) Detailed, clear and exact processing of the qualification units at national level (and, as for example, design of professional standards)
- c) Equation of formal, non-formal and informal education, recognition of the vaguely defined non-formal education context and its division into measurable, well definable and comparable components, that at the same time seems to be the most disputable issue of the system, too.
- d) And not least, the possibility to better plan the own carrier and motivation to education.

The effect of ECVET on assigning credit points to qualification units is quite uncertain at the moment; nevertheless, the methodological discussion can essentially enrich the knowledge about VET and its systems in the EU countries. We see potential particularly in the effort to set up a consistent system of verifying knowledge, skills and competences according to credible methods and appropriate control tools.

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? 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.

The concept of implementing the system into practice (and its outline) is quite unclear yet. The declared intention to describe, validate and transfer the learning outcomes gained in the non-formal and informal context, resp. the possibilities to bridge formal and non-formal education, seems to become one of the most important open questions, also due to the fact, that the SR does not dispose of experience in this field. We also have reserves about the lack of descriptions of mechanisms for making partnerships or recognising competences, knowledge and skills, that do not have an equivalent in other countries. As the technical specifications are rather general, most difficulties we expect at the application of ECVET in different countries with different education systems.

Another difficulty consists in the setting of methods and responsibilities for the decisions about the quality of qualifications and the assignment of credit points (for example the possibility to assign credits en bloc or per partes, the problem to define the cumulation of units etc.), whereat, for the time being, the document leaves much space to subjective decisions.

– 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?

At present, we consider defining the method of the assignment of credit points and setting the reference figure precipitous, as there are no details on ECVET implementation; at first, it is necessary to define / fix the basic terms and processes for the implementation of the system and for its relations to other associated systems (such as ECTS), and to test it. However, ensuring maximal quality of the qualification descriptions stays crucial.

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?

Basic condition of the system's efficiency is a qualification description based on certainly relevant indicators and its consistent development to units (based on outright criteria), as well as the interconnection of the system element with EQF. The appraisal of quality must have apparent rules and proceed in line with standards, created in relation to general as well as special competences, skills and knowledge of particular qualifications.

A further obligatory, however, hardly applicable condition is the acceptance of the system by learners as well as providers and the institutions with decisive authority. This assumes the reflection of differences (the qualifications must finally become comparable) and creation of a database of graduate profiles in the countries, as well as a transparent system of comparison.

The most problematic point of the consultation document appears to be the aspect of representativeness of the qualification description within the system. Each qualification unit must stand for a representative record of learning outcomes; however, to reach just this representativeness is, due to the definition limits, very difficult. The experts surely know how to define the outcome standards, but the principal question is, whether these standards become more an orientation tool for pedagogues and learners, or a true and comprehensive representation of the learning contents and processes. In other words, it is necessary to decide, whether some aspects of the learning process, though contributing to learner's development, could stay undetected by the designers. We namely can not be sure, that the actual outcome records become truly representative. The discussion about splitting education into appropriate units and the related discussion about an appropriate representation of the units will surely be beneficial for the increase of transparency and trust. Nevertheless, the discussion should also aim to the best fulfilment of representativeness possible. It should accept even alternative representations and should not become a tool of unification. It is thus necessary to collect and to confront the experiences of experts from different countries in their effort to change the view of education as „a record of contents assigned to transmission“ to discussing and planning

education as „the record of achievements expected from the learner“. Anyhow, this change need not to result in a credit system. The transparency of the qualification system can increase only to the degree relating to the quality of the description (comprehensibility, controllability, relevance of units).

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

For the time being, we do not attach primary importance to this question, as we prioritize the creation of units and the formulation of learning outcomes. However, in the case of a consentient answer the most important criteria would be a clear definition of the program's duration and exact character, the difficulty of the study, the importance of the content of each unit defined by a complex of knowledge, competencies and skills, the quality of institutions or transparent standards for the interconnection of formal and non-formal education.

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

One of the main sources of inspiration can be the systems operating in similar or associated principles, as for example the ECTS in the university environment. Though, it will become quite difficult to bridge formal, non-formal and informal education, that are not any systemized in the Slovak Republic at present. It also will be necessary to set up the frame for the qualification description, as some non-technical (eventually other) specializations do not allow an exact definition of some units and criteria. Doubts emerge also of the slowness of the approval process or of the lack of acquaintance with its rules.

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

The implementation of the system depends mainly on the attitude, the abilities and on the, at the moment just hardly predictable success of national authorities at its creation and performance, as well as on the methodical coordination of the process. It most likely takes more years, also due to the fact, that in many aspects it probably will require some large-scale reforms and transformation of education. We suggest dividing this process into phases (beginning for example with the experimental verification, then complete the creation of proper conditions and finally define the final dimensions of the system).

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?

At European level, we primarily would expect methodological support (setting the methods of qualification description according to learning outcomes), national bodies should secure the continuation of the consultation process and the task of the sector it should be to create conditions for the implementation of its resolutions (including legislation) and particularly to secure the coherence with the reforms of VET. It would surely help the transparency of the process, if there were ECVET-portals at both, national and European level, as well as good information flow and cooperation of involved parties.

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

Manuals for the description of qualifications, technical guidelines for the evaluation, validation, recognition, accumulation and transfer of knowledge, competencies and skills in the framework of formal, non-formal and informal education will be needed at first.

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

The increase of transparency of vocational qualifications as a consequence of ECVET implementation can result in the support to partnership development and thus in the creation of better conditions of labour force and students' mobility. The potential of ECVET to increase mobility will depend mainly on its quality, the degree of elaboration and preparedness and the legislative conditions (the system should preferably contribute to remove barriers in mobility programmes).

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

It is quite difficult to determinate the extent of ECVET-Europass interaction at this stage, though, at all events, it is necessary to achieve accord between them.