

Consultation ECVET

Introduction

The Norwegian Council for Vocational Education and Training (SRY) is positive to the intentions and purpose of the European co-operation on vocational education and training, including those that are proposed for the ECVET system. SRY supports the objectives of ensuring greater transparency with regards the contents of cross-border vocational education and training.

However, the framework of the proposed ECVET system is so vaguely described that it is difficult to foresee all the consequences such a system would have in the long run. It is therefore important that the Commission initiates a substantial amount of projects to develop and test the possible practical solutions, and to take the time necessary to do so. The questions posed in the consultation document are also found to be too specific and concrete with regards the contents of the proposed system. This may make it difficult to forward more general comments to the different questions in the consultation document. We, therefore, would like to make some general comments to the different categories of questions.

The purpose of and reasons for the ECVET system

Even though the Norwegian Council for Vocational Education and Training (SRY) is positive to the purpose of the ECVET system, we would like to ask whether such a system would work as intended without a harmonisation of the contents and education levels within vocational education and training between the different countries. The document would benefit from including a thorough description of how the different countries' systems, cultures and traditions within vocational education and training could be maintained within the framework of the ECVET system.

SRY would like to point out the danger of basing comparisons of vocational qualifications solely on trust, as this may result in a downward quality levelling rather than an upward one. The document should clarify the basis for validation of vocational education and training from another country, so that it does not lead to a quality de-valuation of the vocational education and training system.

We would also like the working document to reflect further upon the added value this system would have on the enterprises/training establishments.

SRY questions how the ECVET system would be able to deal in a satisfactory manner with both the mobility needs of the formal education system at the same time as the mobility linked to working life recruitment.

While a validation system with relevance to the education system must be based on the formal competence levels and contents of the national curricula, the needs of working life would first and foremost be linked to updated and often specialized competence. Assessment of informal learning could become very different for these two purposes.

The defined framework for the competent authority is described too vaguely. The general framework for the different types of authorities which can be appointed/established, and the intended competence and functions of these authorities, makes it difficult to take a more practical approach to the question of competent authorities. Thus, there is a worry that the system proposed might result in an even greater bureaucratisation of the education and training systems.

The technical basis for the ECVET system

The Norwegian Council for Vocational Education and Training (SRY) points out that it may be difficult to give a constructive opinion on the proposed questions which are asked because the description of the ECVET system is too vague and still seems to be described very generically.

It is important to clarify how the different levels in vocational education and training that currently exist between countries can be taken into consideration in the ECVET system. Furthermore, an elaboration of how a complete qualification would work in relation to its different parts should be included. The method used to describe qualifications and the division into units of learning outcomes also needs further clarification.

The way in which the ECVET system is described as a transaction between two competent authorities, needs to be exemplified. This means that the different processes in the transaction; evaluation, allocation, validation and recognition must be clarified with a more specific reference to the common European principles as well as

recommending basic criteria and expectations for the organisation of these processes. This would make it easier to assess the system as a whole.

Furthermore, there is a need for clarification of how the units of qualifications that are to be defined through the ECVET system are to be related to the competence levels which are defined through the EQF system and the subsequent NQF systems.

Implementation

In addition to the comments made above, we would like to point out that it is important to clarify at national level how credit points (for IVT-upper secondary level), points from technical schools (tertiary level- i.e. "teknisk fagskole") and study points (HE-higher education level) are to be treated in relation to each other.

It is necessary to ask whether such a points system would work against an integrated educational system such as the Norwegian one, where academic and vocational training is organised under the same umbrella (i.e. where IVT is part of the formal upper secondary education organised as 2 years in school and two years in a training establishment leading to a vocational qualification). The introduction of credit points only for the vocational training part of an integrated national system might be viewed by some stakeholders as artificial.

Measures for implementation and development

The description of the framework is too vague. Thus, it is difficult to predict how the system would be implemented in the best possible manner and how it would function. There is a need for further piloting through national and European projects in order to develop the model. We, therefore, recommend that no decision is taken on the implementation of the ECVET system yet. With the challenges currently faced by our national vocational education and training and the resources bound up in it, a cautious approach is recommended for the implementation of the ECVET system i.e. via testing and user-based pilot projects connected to chosen trades, branches or sectors. For further comments see the technical basis for the ECVET system.

Potential for increasing mobility

When assessing the ECVET systems' potential for increasing mobility, it is important to clarify what are the real barriers to mobility in Europe, for example among youth wishing to take parts

of their education in a different country, or for a company wishing to use foreign labour? After having analysed this, an assessment of whether the ECVET system is the instrument to use to overcome these barriers should be conducted.

It is important to contact the schools and enterprises which have experience with mobility from the Leonardo da Vinci programme and the other national exchange programmes when asking the question of whether or not the ECVET system would contribute to increased mobility in vocational education and training. User-group stakeholders must in the future be more involved in the process of identifying both barriers to and potentials for mobility/exchanges in vocational education and training.