



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME response to the European Commission's consultation on an "European Credit Transfer System for Vocational Education and Training" (ECVET)

Introduction

There is the need in Europe for more transparency of qualifications and enhancing mobility, in the education and training systems and on the labour market.

UEAPME was involved from the beginning in the various discussions at European level. Together with the other European Social Partners, as well as the Member states, UEAPME supported “*the development and implementation of the European credit transfer system for VET (ECVET) in order to allow learners to build upon the achievements resulting from their learning pathways when moving between learning systems*” in the Maastricht communiqué¹ and continued this support when asking for “*developing and testing a European Credit System for VET*” in the Helsinki communiqué.²

I - GENERAL REMARKS

UEAPME fully supports the process of creating a European credit transfer system in VET, in particular because the ECVET proposal adopts the learning outcome approach, as it is defined in the current EQF proposal³.

Furthermore, UEAPME approves and insists on the voluntary approach of this initiative, which does not pose any legal obligations for implementation and does not have a regulatory mission.

The possibility for a sector approach is welcome, at national and European level, as the ECVET might be more relevant for some sectors than for others.

Nevertheless, so far the current proposal for ECVET is more a description than a real concept.

ECVET is a long term project, therefore the current ECVET proposal should be considered as a starting process, which opens a dialogue and the current flexible approach should help to better design the final ECVET system.

¹ http://ec.europa.eu/education/news/ip/docs/maastricht_com_en.pdf

² http://ec.europa.eu/education/policies/2010/doc/helsinki_com_en.pdf

³ Learning outcomes better reflect the labour market requirements. Moreover the learning outcome approach is key to overcome the difficulties of taking into account the various forms of learning and in particular on the job learning.

It needs further development through a continuing process and only in the long run, on the basis of several national and sectoral cross-border experiences, a true credit transfer system is going to be established.

Moreover, UEAPME sees the credit points' proposal as one of the weaknesses of the ECVET proposal and the main source for misunderstandings. The credit points should be only a secondary element of the ECVET. They should not have an absolute value and should be only a source of information.

The Commission should focus on the two main core elements of ECVET, namely the "partnership" and "unit" concepts and avoid to present credit points as the third pillar, at the same level of importance as the two others. Further work on this aspect is necessary if the credit points want to bring some added value.

Benefits for Crafts and SMEs

UEAPME identifies certain benefits which the ECVET proposal would bring in the long run for Craft and SMEs in Europe:

- To attract more people to the learning context and motivate them to participate in continuous training
- To enhance the mobility of apprentices and young people in initial VET
- The shift to learning outcome approach can contribute to providing skills better adapted to the needs of the labour market and add to the creation of a European labour market
- To support the management of competences within the company
- To involve the company as a key actor in the process of evaluation, recognition and validation
- To facilitate the modernisation and sometimes reshaping of the education and training systems by the various actors.
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II - RESPONSES TO THE COMMISSION'S QUESTIONS

Question 4.2.1. 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?

Generally, UEAPME agrees with the outlined principles and objectives of ECVET. For UEAPME, ECVET is essentially a transfer process of learning outcomes.

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

The main added value for UEAPME would be that ECVET could enhance qualifying mobility⁴ of VET students, as it promotes the possibility of validation, transfer and recognition of the learning outcomes achieved during this mobility period. This approach could over time be extended to the validation of the outcomes of lifelong learning in general (including non-formal, informal learning...).

⁴ Qualifying mobility is understood as a mobility period which is recognised as an integral part of the training pathway

Question 4.2.2. The technical basis for ECVET

– 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?

Currently the credit point idea is vague and some aspects even contradictory to other elements (eg. focus on learning input vs learning outcomes approach). The random choice of 120 points and the different possibilities for the allocation of these points create uncertainties and do not present any added value for the user. Further work on this aspect is imperative.

Question 4.2.3. 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?

The basic condition is the need to focus on the link to the current EQF which is built on “learning outcomes” and proposes the EU common terminology of skills, knowledge and competences.

The units are the core of the system. One of the main challenges will be to decide on the units at national level. Therefore common European terms of references and common terminology would be of great help to support the national and sectoral level to define workable and transferable units. This will facilitate the development of mutual trust between the partners and improve transparency of qualifications.

Question 4.2.4. 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?

Generally more guidance at all levels will be needed in order to facilitate the implementation of ECVET at national and sectoral level. However, this applies only at a later stage in the implementation of the ECVET process, because the exact content of these guides should be depending on a thorough analysis of the outcomes of experiences developed in the various pilot projects, among others those which are currently supported by the European calls for tenders on ECVET. This should also integrate the results from the ECVET studies, *Connexion* and *Reflector*.

In addition, UEAPME proposes that the European Commission facilitates the exchange of practices which are based on the practical and concrete experience of projects aimed at contributing to the implementation of ECVET. The complete experiences and results from the pilot projects on the ECVET methodology should be gathered and presented together on a web site.

Question 4.2.5. 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?

UEAPME believes that the ECVET proposal is helpful as a methodology in fostering the further cooperation on a bilateral and/or multilateral basis of national stakeholders in order to develop how learning outcomes during a mobility period can be validated, transferred and recognized. By definition it will contribute to the development of various new 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?

UEAPME considers it as an obvious outcome that the quality of the European Community mobility programmes will be enhanced by the ECVET methodology, in particular through facilitating the full recognition of learning outcomes gained during the quality mobility period. Doing so will also encourage mobility actors⁵ to put more emphasis on the quality aspects of tutoring, learning processes and the evaluation of the learning outcomes.

As a consequence this would then logically also help to increase the participation in the European Community mobility programmes. Nevertheless, it is essential to recall that the questions solved by the ECVET methodology are not the only existing obstacles for mobility of people in VET

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

ECVET builds on the experiences of the mobility pass within the EUROPASS. Both of them are complementary to each other. A closer cooperation between those two instruments in the long term needs to be secured in order to ensure consistency.

Concerning the relationship between ECVET and ECTS, UEAPME fully agrees that in the long term these should be made compatible in order to facilitate the transition from one learning system to the other. However, this can not be done in the short term as ECVET first has to work as an own entity and furthermore, currently the two instruments are based on different logics, the one being learning input and the other one learning outcomes.

III - UEAPME RECOMMENDATIONS FOR THE ECVET DEVELOPMENT

Following elements need to be addressed as a follow up to this consultation:

- Common European terms of references and a common terminology should be developed to help national and sectoral competent bodies to organise their qualifications in units based on learning outcomes.
- In order to create and foster partnerships, the European Commission should support pilot projects which develop mutual trust and partnerships,
- The results of the current pilot projects on ECVET should be steered by the Commission,
- The close relationship between EQF and ECVET is not enough shown. This should be further emphasised and exploited ,
- The concept and use of the credit points should be reworked.

⁵ Such as VET institutions, business organisations, chambers, enterprises, schools

Conclusions:

- European craft, small and medium sized enterprises fully support the aims and objectives of the ECVET
- A functioning ECVET could have the following benefits for companies:
 - To attract more people to the learning context
 - To enhance the mobility of apprentices and young people in initial VET
 - The shift to learning outcome approach can contribute to providing skills, adapted to the needs of the labour market
- UEAPME approves and insists on the voluntary approach of this initiative
- The possibility for a sector approach is welcome
- However, ECVET is a long term project, therefore the current ECVET proposal should be considered as a starting process
- A practical experimentation phase is absolutely needed
- Certain issues need to be urgently addressed in order to develop a full operational transfer system, such as: Common European terms of references for units, and reworking the proposal for the credit points, which are one of the weaknesses of the ECVET proposal and the main source for misunderstandings.

Brussels, 14th March 2007