

## Consultation on European Credit System for Vocational Education and Training (ECVET) Position of WKO

Thomas Mayr, 30.3.2007

The Austrian Federal Economic Chamber (WKO) welcomes the consultation process on the European Credit System for Vocational Education and Training (ECVET). We are committed to the European goals of improving transparency of qualifications, facilitating mobility and taking a comprehensive approach to lifelong learning. We therefore welcome any initiative that strengthens and facilitates learning in all its forms and recognise the potential that ECVET has in this regard. We take the following position on the consultation document issued by the Commission:

1. The goal of linking formal, non-formal and even informal learning between countries and systems is highly ambitious. But ECVET can help to achieve this goal. As a prerequisite to do so, ECVET must be developed and implemented in a way that addresses actual needs. Given the diversity of vocational education and training and the actors and responsibilities involved, this task will require the dedication and commitment of a large number of stakeholders. WKO therefore welcomes the Commission's decision to conduct an open consultation procedure. Even after the final document has been approved at European level, a gradual and explorative approach must be taken in implementing ECVET in the Member States. Any attempt to implement ECVET in a fast and top-down approach would seriously harm the development and the acceptance of this instrument.
2. Participation in ECVET must be voluntary. As the European Qualifications Framework (EQF), ECVET is intended to facilitate the attainment of qualifications and to increase the transparency of qualifications. However, it is clear that these instruments cannot entail any regulative effects on their own. Only the original qualifications themselves can act as reference in a legal sense. Credit points or units of learning under ECVET *per se* cannot lead to any entitlement or right. The same applies to a given classification of a qualification in EQF. This fact is obvious from the construction and legal basis on which ECVET will be enacted. Nonetheless, to avoid misunderstanding and to promote the acceptance of ECVET as an instrument, we recommend that this point be explicitly stated in the final document.
3. The final proposal for ECVET should describe in better and clearer terms what ECVET is and what it is not. At present we make out certain contradictions: In the consultation document, the Commission proposes a "toolbox". This toolbox should facilitate the transfer and validation of learning achievements based on memoranda of understanding and a learning agreement between two or more learning organizations. In doing so, the proposal does not go as far as discussions at European level have at times or as the Helsinki Communiqué suggests. Even the name "European Credit System for Vocational Education and Training" implies a broad and all encompassing approach. But that is not what the consultation document itself provides. To be clear: WKO supports the toolbox approach proposed in the consultation document. In our opinion, a centralised introduction of ECVET as a full-scale *system* would run counter to voluntary participation and due to the unsuitability of a top-down approach this would neither be feasible nor desirable.

4. Furthermore, on the issue of “toolbox” versus “system”, WKO recommends that a distinction be made between a short-term and a possible long-term perspective for ECVET and that this distinction be clearly stated in the justification for establishing ECVET. In the short and medium term, ECVET will merely serve as a “toolbox” that can be used by a manageable number of training providers on a bilateral and multilateral basis for transferring and validating learning achievements across borders or even across different systems. In the long term, it is conceivable that this concrete application could be developed into a viable and broad credit *system* in line with a comprehensive lifelong learning approach encompassing formal, non-formal and informal learning settings domestically and abroad.
5. In this sense, WKO views this consultation and the final ECVET proposal, regardless of the legal form the accepted instrument assumes, to be *the beginning of a process*. This process points in the right direction, however, with the final outcome remaining uncertain at present. If the “toolbox” ECVET proves successful in its practical and small scale applications, that could create a pull effect and encourage its use by an increasing number of VET providers including those from the private sector. ECVET must be viewed as an offer that individual VET providers can accept *if they wish to*. For many VET providers, the crucial issue will be whether a large enough number of users forms a critical mass to make participation in the system worthwhile. To initiate and facilitate this development there will have to be pioneers who lead the way by using the instrument successfully.
6. Therefore, the central question at the moment is what can and should be done at European and national level to render ECVET operational as an instrument. The answer is obvious: VET providers willing to take on this pioneer role must be supported. They must be provided with financial and conceptual assistance for concrete applications in ECVET pilot projects. Parallel to this, important work on the re-formulation of qualifications in terms of learning outcomes must be conducted.
7. ECVET must be directly linked to EQF/NQF. These two instruments must be fully compatible with each other. The key to using ECVET is to describe qualifications as learning outcomes, which, in turn, are broken down into units of learning outcomes. Basically, any discussion of technical details and specifications of ECVET is premature as long as it is not clear whether and in what form the implementation of a learning outcome approach is sustainable and whether it is feasible to further subdivide these learning outcomes into internationally comparable and understandable units. This reformulation of qualifications is pressing and in many countries this requires a major national effort.
8. The units are at the heart of an actual application of the ECVET toolbox. They serve as the basis for the memoranda of understanding and the individual learning agreements. As long as ECVET is used solely bilaterally or on a small multilateral scale, it suffices if the specific partners can agree on the description of the units and can understand and interpret the other partner’s units. If ECVET is applied more broadly at a multilateral level (in the sense of a *system*), a standard description of the units would have to be put in place among a large number of partners across Europe. This approach is realistic only in sectors with relatively homogeneous occupations and strong sectoral organisations at European level. These sectoral organisations and their commitment

will be decisive in determining whether ECVET becomes a comprehensive *system* used multilaterally throughout Europe in the long term.

9. It is not yet clear to us what value the credit points have in addition to the units. The often made analogy with a single currency is unfounded. If the credit points are relative to a qualification, they are a national but certainly not a common currency. Furthermore, the suggestion of using 120 credit points per learning year is inconsistent with the learning outcome approach. However, we feel that it is too early to make a final judgment on the viability of credit points. The practical application of ECVET in pilot projects will show whether and in what form credit points are suitable.
10. In addition to our role as employer organisation and Social Partner in Austria, WKO and its local chambers are also VET providers and “competent bodies” responsible for the award of an important number of qualifications. The same applies to many Chamber organizations in other countries. For this reason, we deem it important that European and national Social Partners will be consulted and involved in the next steps leading to ECVET.

(Original in German signed by Dr. Reinhold Mitterlehner, Deputy Secretary General)

Annex: Answers to the questions in the consultation document

## ANNEX

Based on the questions posed at the end of the consultation document, the WKO's position can be summarised as follows:

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

As regards a "toolbox", everything has been presented to a sufficient degree and can serve as the basis for pilot projects and concrete applications bilaterally and, within a certain scope, multilaterally.

If the intention really is to create a *system*: The answer would be no, however, a top-down introduction of this nature is inconceivable and also undesirable.

### *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?

The degree of specification is sufficient for now and for a launch of the process. The main objective at the moment is to agree on the fundamental features. The need for further specification and probably further regulations cannot be determined until ECVET is applied in actual practice.

⇒ Do ECVET's technical specifications take sufficient account of the:

- evaluation,
- validation,
- recognition,
- accumulation,
- and transfer

of learning outcomes whether formal, non-formal or informal? If not, please give details.

The specifications are sufficient for ECVET as an abstract idea, but will not suffice to provide concrete assistance for its practical application. The degree of detail required can only be determined from findings made in actual pilot projects. A manual for VET providers and authorities should be produced later based on the experience accumulated in concrete applications.

- ⇒ 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?

No. The current proposal on credit points is far from being fully developed and tends to be confusing. The primary task right now is to use learning outcomes as a basis for specifying qualifications and units, which can then be applied and tested in pilot projects for the recognition of learning achievements.

### ***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 description of learning outcomes and thus also the classification of qualifications in a NQF must be done in a transparent and credible fashion. This objective can be reached if the actual activities and responsibilities usually performed by individuals with a certain qualification at the workplace serve as the primary frame of reference. Any substantial deviation from reality would greatly diminish the meaningfulness of qualifications specified in this way and erode mutual trust.

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

It is impossible to judge from today's perspective. It is not even clear at the moment whether a credit point system would even be generally feasible or reasonable.

Using credit points as a kind of ratio for expressing a learning outcome as a percentage of a total qualification creates a problem. Two people could obtain a different number of points for the same learning achievement simply because they come from different countries or are preparing for qualifications of varying breadths. Users and especially learners would not understand or accept a system of this kind.

Credit points would have an added value if they could depict the breadth of a given qualification. To fulfill this function, units would have to be largely standardised throughout Europe, so that they could be assigned the same number of credit points uniformly. That is not very realistic as a European approach. More feasible is probably that a small number of partners agree on common units and perhaps even common qualifications. In this case, the credit points would have a logical meaning within this partnership.

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

A feature conducive to the introduction of ECVET is Austria's system of apprenticeship qualifications, the largest group of vocational qualifications in the country. They are already based on occupational profiles geared to learning outcomes and directly aimed at the needs of the labour market.

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

Pilot projects could begin immediately. However, the pilot projects will not obtain any real relevance in terms of the further development and broader application of ECVET until they rest on a foundation of generally accepted descriptions for qualifications based on learning outcomes. In other words, they will not be relevant until work at a NQF has reached an advanced stage and the orientation towards learning outcome is broadly accepted.

### ***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?

We must initiate and provide conceptual and financial support for measures and projects that express the existing qualifications in terms of learning outcomes and subdivide them into units. The Community programmes at European level are called upon to provide this support, as are the national governments.

Structures must also be put in place to allow the Member States to share processes and experience.

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

The pilot projects and the experience gained in them should be regularly analysed and summarised with an eye to identifying the most effective methods, procedures, etc. as well as possible pitfalls. This process could culminate in a “European ECVET Manual”.

### ***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?

Describing qualifications in terms of learning outcomes and units in a consistent and comparative manner is meant to create a shared vocabulary that will help us all better understand the qualifications involved.

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

If ECVET can be employed successfully as an instrument for mobility projects which improve qualifications, this fact will undoubtedly increase the appeal of mobility programmes. It should be pointed out in this context, however, that the lack of credit given to learning achievements abroad is not a significant obstacle to bringing about an increase in mobility. In apprenticeship training the biggest problems encountered in this regard are the lengthy absence from the company and costs incurred by the employer, especially because of the continuation of compensation payments to apprentices.

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

ECVET and Europass are complementary. Europass should be the document used for the actual implementation of ECVET.