

ETUCE

Bruxelles, 15 July 2008

Concerning the ETUCE internal consultation of its member organisations throughout the EU and EFTA on the European Commission's formal Proposal for a Recommendation of the European Parliament and of the Council on the establishment of the European Credit system for Vocational Education and Training - ECVET

The European Trade Union Committee for Education (ETUCE) has launched an internal consultation on the proposal for a recommendation on the establishment of ECVET. As it is stated the proposal will be read by the European Parliament and the Council with a planned adoption before the end of 2009. It is also expected that the Danish Ministry of Education (UVM) will conduct a consultation on ECVET - however this consultation has not yet been announced.

ETUCE has put forward 5 broad questions. In the response to the ETUCE hearing Danske Lærerorganisationer Internationaional (DLI) takes account of these questions. The present position paper is based on statements from two of DLI's member organisations: Dansk Teknisk Lærerforbund (DTL) and Handelskolernes Lærerforening (HL). DTL is representing approximately 5000 teachers at technical or polytechnic schools in Denmark, and HL is representing 2.100 tenured teachers and leaders and temporarily engaged teachers employed at Danish business colleges. DLI is dealing with policies regarding education and the labour market within the EU. DLI is a cooperation of 11 Danish teacher organisations with 180,000 members.

DLI has the following remarks to the ETUCE consultation

First of all, DLI endorses the overall objective of ECVET which is to support and promote trans-national mobility and access to lifelong learning in vocational education and training (VET). Given that VET plays a fundamental role in achieving social inclusion and increasing competitiveness in Europe it is crucial that access to VET is as transparent and open as possible. Recent research¹ shows that several European countries are making VET more flexible and inclusive and that guidance and validation of non-formal and informal learning are also moving to the fore, in especially national lifelong learning strategies. In relation to this the overall idea with ECVET is positive, since ECVET is a system designed to ease credit accumulation and transfer between different VET systems and countries within the EU. DLI also supports the idea that ECVET could contribute to ease up the transition from an education within the VET

¹ CEDEFOP, "Zooming in on 2010: Reassessing vocational education and training" (2007, Luxembourg)

Boulevard du Roi Albert II,
5, 9ème étage
B-1210 Bruxelles

Tél +32 2 224 06 70
Fax +32 2 224 06 71

dli@dlint.org
www.dlint.org

DLI repræsenterer:
- BUPL
- Danmarks Lærerforening
- Dansk Magisterforening
- Dansk Teknisk Lærerforbund
- Danske Produktionshøjskoler Lærerforening
- Frie Skolers Lærerforening
- Gymnasieskolernes Lærerforening
- Handelsskolernes Lærerforening
- Københavns Lærerforening
- Landsforbundet af Voksen og Ungdomsundervisere
- Socialpædagogernes Landsforbund

system into other parts of the educational system. DLI wants to state that the fact that ECVET is based on the value of learning outcomes makes strict quality assurance and mutual trust an absolute precondition for its success!

As stated in earlier discussions DLI still finds that ECVET is too complex, technical and bureaucratic to become a tool that's easy use on a daily basis. In a previous statement DLI highlighted that it is of utmost importance that the users (learners, employers, education providers, national authorities etc.) of ECVET find the tool practical and simple. DLI is concerned about the fact that the schools' administrative burden will increase with the implementation of the Commission's proposal.

ETUCE Question 1 and 2:

DLI is of the opinion that it will be very difficult and complicated to convert the concept "unit" into the Danish VET system since the system is already operating with another law-defined competence-based concept which is not quite compatible with the ECVET unit concept. Even though the Commission claims that "*a unit-based credit system... is compatible with all qualifications systems, learning contexts and learning approaches.*" Accordingly from a Danish perspective, the ECVET unit concept could be seen as *just as another concept* describing learning outcomes, which means that the VET-system in Denmark will have to bring onboard yet another tool for describing the VET educations. That could mean that the Danish VET system becomes more incalculable. Moreover, the description of units must not only - if or when it is implemented - encompass job oriented references. It is crucial that the VET encompasses *general (liberal) education* rather than *just* training for the job. In consequence the description device should be flexible or broad in order to include universal, social and democratic competences as well. This is of utmost importance as many of the young people attending VET have poor school backgrounds and lack basic skills.

It is stated by the Commission that ECVET can have an important role to play in developing curriculum, exams and qualifications to meet the changing demands of the labour market and society. In this regard DLI wants to stress that ECVET must not set fixed or common standards for the organisation, re-organisation or content of the European *national* VET educational systems. It is crucial that the recommendation does not lead to any deterioration of national standards in VET systems. ECVET will, as ETUCE has underlined, introduce concrete changes in the national qualification systems, but it must not lead to harmonisation – slipping in "through the backdoor".

DLI wonders a little about how to incorporate ECVET into the Danish dual training principle - periods in school rotating with periods of training in an enterprise. Can ECVET comprise qualifications obtained during the periods

of training in an enterprise, how can skills obtained through practice *outside school*, be described, assessed and validated through ECVET? As DLI expressed in a former statement about ECVET it is not clear whether it is possible to validate learning acquired at a workplace in terms of *units* and *credits*. This could also in the long run weaken the tendency to promote validation and recognition of non-formal and informal learning.

It is also crucial for DLI to state that recognition and validation of non-formal and informal learning can not be put in place of formal education and training programmes. DLI strongly recommends that the assessment of non-formal and informal learning is proactively integrated as specific learning elements in the ECVET system in order to remove unnecessary barriers.

ETUCE Question 3 and 4:

DLI is not quite sure whether ECVET will help remove barriers for individuals and thereby contribute to an increase in mobility rates between different education sectors or systems, between working life and education and training systems, between non-formal and informal learning settings and the formal education system, or for that matter between VET systems in different European countries. It certainly depends on how ECVET is going to be implemented, and to what extent the social partners are involved in this process. Many EU member countries are in the process of elaborating national qualification frameworks (NQF) which are to be tailored to the European qualification framework (EQF) before 2010. If ECVET is linked to NQF and EQF it might be a useful tool. However, ECVET is not the only instrument or factor to help individuals moving from one setting of learning to another and thereby raising mobility rates. National coherent lifelong learning strategies, including all levels and types of initial and further training or qualifications, are a precondition for removing unnecessary barriers.

ETUCE Question 5:

The biggest challenge for implementing ECVET in the Danish VET system will be to make the value of the ECVET system visible for its users. Furthermore, it has to be stressed that to the opinion of DLI ECVET has to be firmly anchored in the Danish Ministry of Education and not just any independent organisation or institute outside the formal educational system.

Sincerely,



Birgitte Birkvad
DLI – Bruxelles