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## AK Position Paper

“European Credit system for Vocational Education and Training (ECVET) – A system for the transfer, accumulation and recognition of learning outcomes in Europe”

## About Us

**The Federal Chamber of Labour is by law representing the interests of about 3 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore the Austrian Federal Chamber of Labour is a part of the Austrian social partnership.**

**The AK EUROPA office in Brussels was established in 1991 to bring forward the interests of all its members directly vis-à-vis the European Institutions.**

### **Organisation and Tasks of the Austrian Federal Chamber of Labour**

The Austrian Federal Chamber of Labour is the umbrella organisation of the nine regional Chambers of Labour in Austria, which have together the statutory mandate to represent the interests of their members.

The Chambers of Labour provide their members a broad range of services, including for instance advice on matters of labour law, consumer rights, social insurance and educational matters.

More than three quarters of the 2 million member-consultations carried out each year concern labour-, social insurance- and insolvency law. Furthermore the Austrian Federal Chamber of Labour makes use of its vested right to state its opinion in the legislation process of the European Union and in Austria in order to shape the interests of the employees and consumers towards the legislator.

All Austrian employees are subject to compulsory membership. The member fee is determined by law and is amounting to 0.5% of the members' gross wages or salaries (up to the social security payroll tax cap maximum). 560.000 - amongst others unemployed, persons on maternity (paternity) leave, community- and military service - of the 3 million members are exempt from subscription payment, but are entitled to all services provided by the Austrian Federal Chambers of Labor.

Herbert Tumpel  
president

Werner Muhm  
director

## Executive Summary

The vocational education and training systems in Europe are extremely varied and diverse in terms of both initial and continuing vocational training. In connection with this, a lack of transparency causes problems in terms of the comparability, recognition and certification of qualifications. It is often not easy for workers to explain or prove to a potential employer which qualifications they have gained. Conversely, employers, public as well as private training providers have a hard time assessing the qualifications and competences acquired by a citizen. In both cases, only the qualifications acquired formally come in useful at present; all other nonformal competences or those acquired informally scarcely come in useful.

The lack of mutual trust in other vocational education and training systems borne out of ignorance hinders attempts at greater interchangeability between the vocational education and training systems in Europe and ultimately also mobility on a European labour market.

That is why the Federal Chamber of Labour (AK) has already declared itself in favour of European and national measures in principle in its opinion on the European Qualifications Framework (EQF) of 10 October 2005. These measures support workers in terms of voluntary mobility within and between several learning systems and in future also on a European labour market.

The AK is extremely interested in playing a part in developing ECVET also because the social partners play a central role in the further development of vocational education and training.

## The AK's basic position on ECVET

ECVET should facilitate the recognition, transfer and accumulation of individual learning outcomes within Europe.

The proposed European Credit system for Vocational Education and Training (ECVET) should make it easier / facilitate the recognition, transfer and accumulation of individual learning outcomes within Europe. According to the consultation document (page 5), it "complements" the European Qualifications Framework (EQF), which the AK delivered its opinion on in the autumn of 2005.

Following this opinion on the EQF, which the AK feels should be closely connected with ECVET in conceptual terms, the AK advocates developing the present draft further.

The expectations that we have of the development and creation of ECVET are basically as follows:

- Greater orientation towards learning systems, in particular the Austrian one towards the learning outcome / learning output
- Strengthen the identification and validation of nonformal and informal learning
- Standardise and objectify accreditation and certification procedures
- Greater use of and advances in quality assurance for education
- Increase the vertical and horizontal interchangeability of learning systems

The AK believes that ECVET offers

possibilities to achieve greater transparency, better comparability, transferability that is as smooth as possible and because of this easier mutual recognition of professional qualifications in Europe. In terms of a policy of interests, the AK expects that ECVET is implemented in such a way that it opens up the following above all to its members, those in the working world and those in education:

- 1) Mobility within the training systems between individual stages and levels (national and international)
- 2) Mobility between training systems (also beyond the borders within Europe)
- 3) Better opportunities on the Austrian and European labour market

## Q&A in accordance with the consultation paper

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?**

When outlining the purpose and most important objectives of ECVET, the possibilities that a text offers over 21 pages besides dealing with procedural questions, the formulation of political objectives etc. were exhausted.

However, we believe that there is a need above all at Member State level for specific details concerning the question about competent authorities and their role.

On page 12, the question “What is a competent body for ECVET” is defined as follows: “Authority, institution or organization at national, regional, local or sectoral level that, according to national rules and practices, is responsible for and/or involved in one or more of the functions related to the implementation of ECVET.”

For the AK, this would be – by no means an exhaustive list – the institutional actors of Austrian vocational education and training, namely vocational training centres, companies that provide training, secondary and upper secondary schools

that provide vocational education and training, further training centres, the Federal Ministry for Education, Science and Culture as well as other ministries responsible for vocational education and training, various state authorities and last but not least the social partners. The creation of new institutions and authorities is not inconceivable if one uses the experiences and practices of other states when creating national qualifications frameworks or credit systems. This opinion or list may also be understood as a question that needs to be clarified as a matter of priority when working on ECVET.

In the study by Michael Young entitled “National qualifications frameworks: Their feasibility for effective implementation in developing countries” (ILO Skills Working Paper No.22, 2005), it states on page 19: “The qualifications authorities responsible for the NQF in England and New Zealand have a staff of several hundred and in South Africa about 70 (at last count).”

Because credit systems in vocational education and training require national qualifications frameworks as a rule or credit systems used in combination with national qualifications frameworks, we need to see to it that – if necessary – new bureaucratic capacities are only created by weighing up their usefulness.

The recognition and accumulation of learning outcomes via credit system should lead to synergies and thereby savings in training systems.

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

Strengthening the horizontal and vertical mobility within the national learning system and between European learning systems, increasing participation in (further) training by recognising as much knowledge, skills and competences as possible, acquired in whatever way or form. The recognition and accumulation of learning outcomes via a credit system should lead to synergies and thereby savings in training systems. When switching between different training systems, what citizens have learned once should be recognised and the time taken to achieve the desired qualification should be shortened unlike the status quo.

4.2.2. 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?**

In the present paper, different approaches to the identification and allocation of ECVET credit points are cited (page 14: e.g. length of programme, learner workload during training...) that all provide information on the intensity of the learning activity, but say nothing about the qualification level involved. In this vitally important passage, the paper fails to mention the fact that the European Qualifications Framework (EQF)

and its national counterpart, the National Qualifications Framework (NQF), should or could come in useful here.

According to the consultation paper, ECVET and EQF/ NQF complement each other in terms of their purpose and objective; we agree with this. However, the AK also believes that the potential added value of a system can only really be exhausted with the other. In our opinion, this connection should be made clear later in the corresponding legal instrument for ECVET.

With ECVET, formal, non-formal and informal learning outcomes should be assessed in a transparent way. The case of "Martin" (page 11) assumes that Martin is in a formal learning context in the training centre in his native country as well as in that of the host country. In this case, the agreements on evaluation and recognition between the two training centres on compatible quality appear to present no problem.

However, we ask ourselves whether this example can be applied to the Austrian dual training system with justifiable expenditure if one considers that only 3 per cent of Austrian trainees receive their training in large-scale enterprises, whilst 70 per cent of trainees are trained in enterprises with less than 50 employees.

Every trainee should have the right to access and use the system.

When developing ECVET, we must take into account the structure in Austria, which is made up largely of SMEs, by giving every trainee the right to access and use the system; the latter irrespective of the relevant learning context.

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.

We evaluate the current description of the technical specifications as an open idea and as adequate and conducive given the prevailing development status. In any case, ECVET has devoted itself to measuring output when describing professional qualifications, which the AK welcomes. However, we ask you to consider that there is still a need for stronger common principles or courses of action with regard to the procedures concerning the identification, description and assessment of learning outcomes. Otherwise, there is the danger that too much variability in the choice of the method to describe learning outcomes could lead to a lack of reliability and a lack of transparency again, even though building up trust is a key element and basic prerequisite for the planned system to work.

In the case of "Marie" (page 12), "several years' occupational experience in a

company abroad" is assessed by a training centre and credits are awarded to her. We nowadays talk in general about an ever shorter "half-life of knowledge". If we were to also take this into account when evaluating Marie's occupational experience, how many years would this experience be behind?

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?

The AK feels that it is more to do with issues of feasibility, implications for the vocational training policy and policy of interests as well as the effects of such an innovation on workers at present. The AK believes that the issue concerning the number of credit points inherent in the system should not be given top priority at present.

However, in connection with this we would very much like to ask how the professed ECVET will fit with the existing credit point system of the Bologna Process, the ECTS. In terms of the interchangeability of systems, it would be desirable if ECVET credit points could also be counted towards academic education or further training.



Possibilities in this context would be of utmost importance particularly for Austria, with its distinct and high-quality vocational education and training system as part of upper secondary schools.

#### 4.2.3 Implementing ECVET

##### **How and within what timeframe could ECVET be implemented in your country?**

If we succeed in drawing up the Austrian NQF (National Qualifications Framework) by 2010, then it should be possible to implement ECVET in general in 2013.

#### 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?**

The AK declares itself in favour of a test phase above all in the area of continuing vocational training. Workers and members of works councils should also be included in projects and accompanying research.

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

We propose the creation of “manuals” or “guidelines” for the different protagonists at all levels (“competent bodies”, social partner organisations, education centres, citizens etc.) with practically oriented and exemplary procedures in order to ensure efficient implementation and execution.

These materials would need to provide specific answers to any questions that a consultation paper naturally throws up.

#### 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?**

It could encourage us to set up or develop national and transnational training and qualification associations (briefly mentioned in the consultation document several times as “partnerships”), leading hopefully to a strengthening of the training possibilities as well as an increase in training quality.



## Opportunities and risks

The comments made hitherto reveal on the whole that the AK has a fundamentally positive interest in finding ways and means for greater cooperation in vocational education and training in Europe. The development of the EQF and ECVET systems is without doubt an important step in this direction. Its realisation would be the result of a European educational policy that can have significant effects from time to time on the learning and training systems of the individual EU Member States. This results in opportunities as well as risks for vocational education and training in Austria. For the AK, the virtual opportunities of instruments like EQF und ECVET in any case arise in such a way that we feel obliged as the representation of worker interests to take an active part in the forthcoming processes.

Austria and the other Member States are free to join the EQF and ECVET systems. The concepts facilitate the one and tolerate the other (optional nature). In addition, no Member State is compelled to change any part of its vocational education and training system if it participates in EQF and ECVET (page 5, middle paragraph).

However, the AK recognises mechanisms in instruments from the recent European education policy that promote harmonisation without superficial coercion. This includes e.g. the Bologna Process, benchmarking, the method of open coordination and also EQF and

ECVET. We would like to stress that these intentions to harmonise learning systems in terms of transparency and adopt exemplary practices and methods are positive.

With regard to Austria, the AK wishes to ensure that the public authorities / the republic (continue to) carry out the following responsibilities:

1. Organise content, structure and provide general education and vocational training autonomously (Art 149 and 150 EC Treaty); in the case of vocational education and training, close cooperation traditionally with the social partners.
2. Safeguard and develop initial vocational training systems further.
3. In case EQF-NQF or ECVET are implemented, responsibility for the systems, or the "authorities" (as defined by the consultation paper) should ultimately enforce ECVET (e.g. evaluate, recognise and document learning outcomes).

For any further questions please contact

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