RESPONSE TO THE EUROPEAN COMMISSION'S CONSULTATION ON ECVET (European Credit System for Vocational Education and Training)

EUCEN's contribution to the consultation of the Commission on ECVET does not follow the proposed grid since that seems more adapted to a national authority than to a European network. We therefore choose to answer in a global and transversal way.

Our answer is guided by our conception of lifelong learning:

University lifelong learning is the provision by higher education institutions of *learning opportunities, services and research* for:

- the personal and professional development of a wide range of individuals (*lifelong and life wide*),
- the social, cultural and economic development of communities and regions,

in *collaboration* with stakeholders and external actors at *University level* and *underpinned by research*[1].

EUCEN's mission is to help European universities to become lifelong learning organisations. This implies a fundamental transformation of their current learning provision and programmes and of their pedagogical, administrative and financial organisation. The lifelong learning process begins with initial education and the universities must integrate this as key element of their future developments. This strategy is, from our point of view, fully part of the Lisbon process.

Our intention, as the Association for University Lifelong Learning in Europe, is to examine the propositions of the Commission whenever we are asked or consulted to take this global and transverse strategic positioning in relation to the national or sectoral positions.

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- *Learning opportunities* means here not just 'courses' but work based learning, projects, supervision etc
- *Services* include for example: validation of non-formal and informal learning, advice and guidance, mentoring etc
- *Research* includes research into lifelong learning, learning needs, social and economic regional needs etc
- *Lifelong* is the time dimension – at any point in an individual's life
- *Life-wide* means the different domains of life: social, cultural, domestic, employment, civic activity, voluntary work etc of an individual or group
- *Collaboration* may involve employers, trade unions, professional bodies, community groups, municipalities, NGOs, student groups, learner groups etc
- *University level* means above university entry level
- *Underpinned by research* means that the content of the teaching and the teaching and learning methodology should be informed by research

EUCEN's position concerning ECVET is balanced

First of all, we fully understand the Commission's concern to encourage the emergence of a system promoting identification, accumulation, transfer and recognition of learning outcomes, whether through formal, non formal or informal learning, throughout Europe and we echo that interest. Mobility in education and/or professional activities must be supported by systems facilitating a reading of learning outcomes by all, irrespective of the education, training and work contexts and learning cultures and more widely the existing relations between education and work in Member States. **EUCEN notes** in particular:

- the possibility to develop progressive pathways, adapted to the rhythm of each, individual, able to continuously motivate in new ways,
- the possibility to recognise all individual progress, however limited, by accumulation,
- the incentive to set up recognition systems notably in Member States where nothing currently exists,
- the increasing legitimacy and eligibility of non formal and informal learning,
- a growing emphasis on mobility in Europe, which requires a parallel development of mutual trust.

EUCEN supports the principle of a pragmatic process adopted by the Commission for the implementation of ECVET:

- consultation of Member States and more involvement of other actors and stakeholders,
- a search for consensus,
- an approach based on testing and experimentation with prototypes,
- priority to be given to the added value and benefits.

EUCEN approves the construction of a system based on learning outcomes rather than on programs or contents and the consistency established with the descriptors mobilised for the European Qualification Framework, especially since it may guarantee the recognition and validation of non formal and informal learning.

However EUCEN wishes to react on two levels:

- on the system of ECVET itself, the current proposal should be considered as a starting point for a process which seeks clarification and discussion on several major issues;
- on the implementation of the system in higher education and particularly in the field of continuing education.

Concerning these two dimensions, EUCEN would welcome a dialogue with the Commission in the near future. In this document, we just focus on a few critical points, seeking for complementary contributions from the Commission. EUCEN is ready to contribute to the discussion through extended consultation and dialogue or through membership of any working groups set up to progress the debate.

1 Reactions to the ECVET system

1.1. A system too closely linked to vocational education systems and not enough anchored in a lifelong learning perspective

The ECVET system proposed by the Commission is, from our point of view, too much linked to formal education and training arrangements, particularly vocational education systems. ECVET is presented by its promoters as a system allowing each individual to build his/her skills development and qualification process throughout life moving from one formal training system to another in a different country or institution and making possible the official recognition of what they have learnt formally, non-formally and/or informally. This constitutes for EUCEN a crucial point and the guarantee that the general objectives of the system will be achieved and its efficiency assured.

However the document is mainly built on vocational education issues and lifelong learning appears to be an "add-on" element rather than fully embedded and articulated. This is borne out in the discussions which took place in Member States where lifelong learning issues are not really included in the discussion which focuses essentially only on vocational education systems and actors. Thus, in our view, there is a real risk of the debates focussing on classical approaches, on initial education and training systems, on inputs and not on the recognition and validation of the outcomes of lifelong learning in general, even though everybody admits that learning outcomes are more and more essential in building individuals' professional and social capacities throughout their life in contributing effectively to mobility.

1.2. The needs for clarification to avoid ambiguities

- A system that aims to encourage the transfer of learning outcomes transfer for mobility or a system fully-fledged system for its own sake?

The document presents ECVET as a methodology for the description of qualifications in order to facilitate transfer, accumulation and recognition of students' learning outcomes for mobility. One of the main obstacles to mobility in vocational training is the difficulty of identifying and validating learning acquired during a stay in another country. It is a voluntary approach, with no legal obligations for implementation, that must rely on the synergies between education and training institutions. But, simultaneously, this approach and the objectives are widened to outcomes of lifelong learning and involve all institutions, organisations and actors contributing explicitly or not. Thus, we could envisage that EVCET will progressively become a Community tool, identified as a common regulation for Member States.

So, is ECVET a simple grid helping institutions on a voluntary basis to understand and to take into account what students have learned abroad "when issuing a qualification in the learner's country of origin", a "common grammar" or a common independent reference system for formal education and training and for non-formal and informal learning?

- A modular system based on qualifications or a system based on units?

The document provided by the Commission clearly indicates that ECVET is centred on qualifications, but at the same time the basic reference is the **unit** as means of identifying of learning outcomes[2]. This unit can be specific or common to several certifications and can be combined in different ways. We identify in that idea a potential risk. The "useful" reference becomes progressively this smaller element and the individual's professional qualification becomes the addition of units acquired in different ways or systems regardless of the existing qualifications/diplomas/certificates. This view is reinforced by the fact that the document indicates that ECVET is "complementary" to the EQF. If it was really centred on qualifications, it should be fully articulated with both the National Qualification Framework and with the EQF.

- A system based on the transfer and accumulation of units or a system based on allocation of credit points validated and recognised by partners having signed common agreements?

What is the currency? What is the basis of the conversion? The unit or the attached credits? Commentaries by ECVET promoters evoke a "common grammar" (we think that it would be necessary to clarify this more), but why then to refer to credit points? Do credit points have an absolute or a relative value? Either we use a common grid, or we are in a system of exchange. We think that the reference to credit points is at this stage confusing. And why 120 credits points associated to the learning outcomes achieved by an individual in a year in a formal full time context when already in higher education there is agreement on 60 credits for the same equivalent? Why use a different measure for vocational education and for higher education?

- A global system or a system based on agreements between partners?

The ECVET initiative is based on a voluntary approach and its implementation must be the result of "partnership agreements or memoranda of understanding" between vocational education and training providers and or competent bodies in Member States. This reinforces considerably the weight of formal learning processes. How to integrate informal learning or non formal learning in this scheme? How to take into account learning outcomes acquired in companies, associations or NGOs? How to consider the lifelong learning perspective? The proposed approach signifies that non formal and informal learning can only be recognised and validated under the umbrella of formal learning and training institutions. But other organisations, due to their diversity and their geographical spread, will not really be associated in these partnerships except in case of formal networks or multinationals.

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[2] What is a unit? "A set of knowledge, skills and competences which constitute a part of a qualification. A unit can be the smallest part of a qualification that can be assessed, validated and, possibly, certified. A unit can be specific to a single qualification or common to several qualifications"

On the other hand a systematic search for partnerships would perhaps encourage the creation of networks of learning and training institutions, possibly linked to companies, to big trusts and NGOs or professional bodies. These would present themselves as networks" of excellence" or "closed "or" integrated networks ", making their selection criteria more demanding or more narrow to meet their specific requirements their selection criteria, eliminating recognition more widely based on experience or on learning acquired in institutions not belonging to this network. In such a situation they are likely to guarantee to their members or "clients", adapted "European products". From this, we might see the gradual development of several European systems or subsystems functioning in parallel and not necessarily offering guarantees of transfer from one system to another.

1.3. The limits of a process based on voluntary participation

We understand the caution linked to the principle of subsidiarity but we believe that the insistence placed on the voluntary dimension of the implementation of ECVET is problematic since it may be complex and undermine equal opportunities for young people and adults, relying more their family, social, professional or educational backgrounds. One of the issue for the ECVET system must be to provide a simple and straightforward response to individuals searching for mobility and assistance to those who would be excluded from a system based on a certain form of elitism.

2 ECVET and the higher education

The main criticisms on ECVET coming from representatives of higher education are related to its added value relative to ECTS. For some years, actors in higher education have endeavoured to put in place arrangements allowing students' mobility across Europe. Initiated through Erasmus, reinforced by the contributions of numerous working groups and projects, such as the Tuning network, the system evolved further with the Bologna process and the implementation of a common European framework of three levels: BMD. Beginning as exchange system based on partnerships, the system evolved progressively integrating the idea of credits to become a generalised system with BMD, and a system based on, at least in principles, learning outcomes.

This gives rise to three main criticisms of the ECVET proposal:

- Why replace a system that is already well embedded and which now involves the majority of the higher education institutions (ECTS is currently in the regulations of several countries and is used by 75% of the universities)? It would be counterproductive to stop this process and to replace the existing system by a system which does not yet exist, will be experimental for years, and has to prove its appropriateness and efficiency.
- Why attempt to standardise when the objectives and procedures are not rigorously identical? The ECTS system can be applied to "general" diplomas as well as to professional diplomas or diplomas offering professionalising approaches. One example of the difficulty met by the Commission in this process is given by EQF which juxtaposes but does not fully articulate two systems.

- And finally, why insist on a unique system if ECVET is only a system based on partnerships? If ECVET is no more than a common grammar used on a voluntary basis?

From the ECVET promoters there is a criticise that the ECTS system is based on too close articulation with academic programmes, too strong and emphasis on learning inputs, on disciplinary based modules, on time (in particular the student's workload) rather than on learning outcomes, arguing that on the contrary ECVET rests solely on learning outcomes. The representatives of higher education (EUA, the national Conferences of Rectors, promoters of Bologna process,…) response is to point out that the ECTS system evolved, that it progressively integrates the notion of learning outcomes and that it is in place in practically all countries having signed the Bologna agreement.

The position of EUCEN is more qualified.

1 EUCEN does not wish to call into question the remarkable work achieved in the universities since the creation of ECTS. The work done has permitted real progress in the reflection inside universities to move from an academic approach centred on the establishment and on the academic staff towards a dialogue approach with, on the one hand companies and professional bodies giving a stronger emphasis to the subsequent employment prospects of students, to guidance and counselling, and to validation of non formal and informal learning, and on the other hand, other universities at national level as well as European level.

2 EUCEN considers that ECVET, in the present state, is not really suitable to higher education taking into account the specific nature of the diplomas awarded by higher education institutions. The notion of a "unit" proposed by ECVET, as an integrated coherent whole combining knowledge, skills and competences, with its own internal consistency, does not well suit higher education provision which requires an extremely strong articulation between and a strong articulation of the components of the qualification into a coherent diploma. The logic of the" final product" is not located in the accumulation of units and their consistency with targeted professional requirements but in a coherent combination of several complementary approaches (or even sometimes contradictory ones) including knowledge as well as methodologies and aiming to build attitudes and high level expertise to deal with problems and unforeseen situations in a given field and type of activity. The holistic coherence is in totality of expertise and capacities to adapt to varied and changing contexts, and not in the components of the qualification. Thus, the notion of "unit" as proposed by the Commission is problematic in higher education. This does not means that a "unit based" system is not useful or necessary, but it must be open ways of combining unit based approach and holistic approach.

3 From this position, is it necessary to consider two complementary and articulated systems, as is the case with EQF, with on the one hand a system linked to vocational education and training, corresponding to levels 1 to 5 and on the other hand a system linked to academic programmes correspondent to levels 6 to 8?

We anticipate some considerable difficulty in reading and understanding the higher education system. Currently, higher education is subject to three "qualification frameworks": vocational education and training based on EQF levels 1 to 5, an academic system based on BMD, and EQF level 6 to 8 and the "professional"

framework based on the 2005 Directive on professional recognition identifying 5 levels. Do we need three systems for reading formal learning as well as non formal and informal learning?

We agree that we need common tools to promote more transparency and to support geographical mobility as well as inter-institutional mobility, but is it necessary to establish a global system? We are in favour of a process based not on a regulatory framework but on common principles making the systems compatible and facilitating transition from one learning system to another.

4 The proposition to associate 120 ECVET credit points to the learning outcomes achieved, on average, by an individual, in a year in a formal full time learning context as opposed to higher education that uses a measure of 60 credits for the same notional equivalent is not, in our view, a well-judged move. The proposition is, at this stage, vague and increases confusion. It should be reconsidered on the basis of the extensive higher education experience and on a deeper reflection on the shift from learning inputs to learning outcomes.

5 However, at the same time, EUCEN reaffirms that it is necessary that the ECTS system evolves to bring units and credits closer to learning outcomes. It is necessary that universities acquire a new " culture ". The progressive recognition of the importance of non-formal and informal learning inevitably provokes a shift in our programmes from a teaching logic to an assessment logic. What is becoming essential for higher education institutions is to make visible what they finally assess, what are the capacities acquired by students, compared to potential students and employers and not just to academic programmes. Access to higher education should in the future offer different pathways and universities should offer different types of learning opportunities and services but it is necessary to progress on several aspects.

- Clearly when universities or ECTS promoters affirm that universities have fully integrated the notion of learning outcomes to organise and present their programmes, this has to be verified. This is certainly a willingness and an intention on the part of the actors in charge of the promotion and the implementation of ECTS but it is far from being a verifiable reality in many Member States. The implementation of BMD, the definition of the content of units or modules remains marked by an academic logic, a reflection on the basis of programmes and contents, and the attribution of credits to each of these units based on a hierarchical logic. It is often not yet based on the identification of units/modules contribution to the overall objectives and/or an analysis based on workload. The analysis achieved by the150 universities in the Beflex project (www.eucen.org/Beflex/index.html) showed that there is still progress to make on this approach, with many institutions displaying good intentions but indicating simultaneously that it is a long-term project.
- Evidently universities are far from having integrated the recognition and the validation of the formal and informal learning as a major element contributing to learning outcomes. Currently higher education institutions in the more advanced Member States, which have implemented these practices of recognition of "exogenous" learning, limit this recognition to derogatory access or to exemptions. No universities, that we are aware of at the present time, except in France, award a whole diploma on the basis of non-formal

and informal learning, even though it is one of the key elements of the insertion of the universities in a lifelong learning strategy.

- Finally it is necessary to further develop the Diploma Supplement. At present it reflects quite traditional academic approaches to presentation of learning programmes and assessment arrangements. It is not easily readable even for another academic establishment, and it is not a fortiori for an employer. The Diploma Supplement must evolve to provide to all potential users a clear presentation of the capacities effectively acquired by the qualified individual.

On all these issues the actors and the institutions working on University Continuing Education and Lifelong Learning have acquired an expertise and an experience which can usefully contribute to the establishment of a bridge between vocational education and higher education.

Lille, April 2007