



Conseil de l'Éducation et de la Formation

**Contribution of the CEF to the consultation in the French
Community Wallonia – Brussels as regards the system of European
learning credits to vocational education and training (ECVET)**

The Council of February 2007

Answering elements as concerns the consultation document of the European Commission

In this document, the CEF proposes an answer to each of the fourteen questions set forth in the consultation.

When the term "competence" is used in this document, it should be understood in the meaning used by the authors of the consultation document, i. e. in the meaning corresponding to the definition proposed by the Cedefop: "The capacity to implement knowledge, know-how, aptitudes and capacities in a usual or new work situation."

1.1 Questions about the purpose and the reasons for an ECVET system

1.1.1 First question: 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?

The human and financial investments that will be needed to implement and enable the working of the future ECVET system will only be justified if there is a genuine added value, as well at the social as at the professional levels, for all citizens of the Union : enhanced acknowledgement of acquired competencies, access to new training and job opportunities ... With this in mind, the ECVET system should fit into all patterns of social cohesion enhancing policies aimed at combating all forms of discrimination. As a consequence, the CEF deems this finality to be the cornerstone around which all objectives and functions of the ECVET system proposed in the consultation document will have to revolve.

The CEF hereafter proposes various comments about the objectives stated in the consultation document as being fundamental for the ECVET system:

- a. the mobility of people undertaking training,
- b. the validation of the outcomes of lifelong learning,
- c. the transparency of qualifications,
- d. the mutual trust and co-operation between vocational training and education providers in Europe.

A. The mobility of people undertaking training

In the consultation document, the Commission above all considers the international mobility of young learners in their initial vocational training stage. The underlying model is close to Erasmus' one, i. e. a chosen mobility, of short duration, institutionally organised, in which a young person only temporarily leaves his training institution.

These lead us to formulate three comments:

- First, the implementation of a system of learning credits within various vocational training and education systems will generate considerable costs; this considerable public investment should benefit the greatest possible amount of people.
- Second, it should be noticed that this international mobility in fact only concerns a very tiny fraction of young initial vocational trainees and that nothing allows us to think that, at short or middle term, the States of the Union will have enough budget means to ensure that a really significant part of this public will really have access to this type of mobility in all fairness. With this background, to effectively ensure equal opportunities for all citizens, we cannot seriously imagine a growth of international mobility without setting up a specific mobility fund at the European level.
- And finally, it would be particularly judicious to consider another form of mobility which is more and more common to a very huge number of workers, young and old alike, who

resume training sessions in the framework of a redeployment, a promotion wish or the quest for a new qualification¹. As a matter of fact, a large part of this public participates in a national mobility between various vocational education and training systems. This public goes from one system to another and is directly confronted with the transfer issue and the problem of the accumulation of competencies.

As the Commission admits, young people's mobility as concerns the initial vocational training 'is considered to be more of an "interlude"². On the other hand, allowing workers' mobility within European and national vocational education and training systems is part of the priority aims of the Belgian French-Speaking governments³ for vocational education and training systems. As transnational mobility and intranational mobility pertain to complementary dynamics, the CEF recommends that the French Belgian governments give precedence to the necessity for the Commission to propose to the members states to adopt the ECVET tool under construction to foster their own intranational mobility and to avoid limiting its action and support plans to the exclusive international mobility of young learners undertaking an initial vocational training session.

B. The validation of the outcomes of lifelong learning

The consultation document is clear about the aim to be reached but not about its fulfilment, which still remains undetermined. Numerous technical problems will have to be overcome and it should therefore be useful to delineate the various aspects of the objective and to program its implementation.

C. The transparency of qualifications

The consultation document is clear as far as the objective to be reached is concerned : crucial is for European citizens to develop, to their profit, an improved transparency of qualifications. This is, indeed, the main object of the implementation of the European Qualification Framework. For that reason, it is specifically important for the Commission to clarify its intent when saying : "In this regard, ECVET is complementary to the European Qualification Framework."⁴ And, of course, the ECVET system could be the tool enabling the description of the qualifications acknowledged by the competent authorities of each European State⁵ through the singling out of the components of delivered qualifications. However, the CEF refuses drifting into confusing a unit of learning outcomes with a qualification. In no way should we enter a process of qualification atomisation and of referencing, within the European Qualification Framework, of learning outcomes units which would not correspond to a qualification process⁶ acknowledged by the competent Belgian authorities.

In other words, the CEF refuses to witness the apparition of micro-qualifications that would maybe only correspond to one key activity of a profession because a qualification must correspond to a profession and cannot be restrained to a job or an office.

See also the answer to the 4th question.

¹ The concept of qualification here corresponds to the definition used in the European Qualification Framework.

² See item 1.2. of the consultation document.

³ See on this topic the governmental statements of the governments of the COCOF, the French Community of Belgium and the Walloon Region; the *Contrat pour l'école* and the *Plan Stratégique Transversal 2*.

⁴ See item 1.4. of the consultation document.

⁵ Though it would be possible to isolate the various ECVET units constituting a qualification, it is useful to call back to mind the necessity to respect the principle of subsidiarity, the acknowledgement of qualifications should strictly pertain to the competent authorities within each Member State of the Union. As a consequence, theirs shall be the task to define the conditions for awarding qualifications to holders of units of learning outcomes.

⁶ The concept of qualification used here is meant to correspond with the definition proposed for the European Qualification Framework.

D. Mutual trust and co-operation between vocational training and education providers in Europe

The consultation document is clear about the objective to be reached. To ensure to European citizens the actual right to mobility in all its aspects (geographic, social, sectoral, ...) and to thus ensure the portability of their competences (which implies to be able transferring and cumulating them), it is essential for all European vocational education and training providers to have tools and procedures at their disposal to facilitate all forms of co-operation and foster mutual trust. To develop trust, the consultation document proposes to conclude partnership agreements. This is a good solution if the aim is to ensure mobility within a restricted area or in a sector covered by a limited amount of vocational education and training providers. This will, most probably, be the best way in a first experimental stage to set up the ECVET system. However, taking into account the multiplicity of VET involved persons within the Union, the conclusion of bilateral partnership agreements will soon appear to be unrealistic. Of course, to ensure a genuine mobility in Europe in the field of qualifications⁷ corresponding to a given profession, each competent authority will probably have to conclude more than one hundred agreements. It is even not at all sure that the most important competent authorities will have at their disposal sufficient human and financial means to establish and update those agreements. Seriously, we cannot hope in all honesty that a framework shall be created to actually enable the development of a transnational mobility without the support of specific European subsidies to fund or at least co-fund the initial stage of implementation of those agreements.

Should we really wish to implement ECVET, simple, low-costs tools and procedures, open to all, will be needed, which, while respecting the subsidiarity principle, will facilitate all forms of co-operation and foster the development of mutual trust between partners. Such tools will have to be submitted to research and experimentation funded by the Commission and involving all Member States.

1.1.2 Second question: *What would be the main added value of the planned ECVET sytem?*

Even if its implementation will take time and be complex, the ECVET system is presented as a simple tool enabling for all European citizens the transfer and the lifelong accumulation of competencies. Indeed, though nothing currently impedes mobile citizens to transfer and cumulate their competencies, this remains, in practice, extremely difficult. ECVET is a system aiming to facilitate all mobility (geographic, social, sectoral ...) and thus allowing for the implementation by each citizen of his lifelong learning and training project.

Furthermore, through its implementation, the ECVET system, among other things, will contribute at the level of the VET to two types of enrichment favouring the general quality of the systems : the emergence of shared understanding as regards vocational qualifications that will be a source of improvement of the contents of training itineraries and the development of quality warranting processes which are indispensable to the acknowledgement of the value of learning outcomes units awarded by each provider.

⁷ This document has been conceived in coherency with the two meanings proposed by Cedefop for the word "qualification": an official one (certificate, diploma, title) acknowledging that an individual has followed with success a training or education action or that he has achieved sufficient results for a test or an exam / has met the requirements to gain access to a profession and to participate in a professional background.

1.2 Questions on the technical basis for ECVET

1.2.1 Third question: *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?*

Admittedly, the technical specifications set forth in the consultation document could constitute the fundamentals of the ECVET system⁸, though their current presentation nevertheless remains theoretical and general.

Possible opposition could above all emanate from the proposal of concrete procedures to implement the system.

The Commission must empower a significant process of research-actions. These research-actions should allow checking the relevance of the technical specifications currently advocated and opening up concrete tracks for the implementation. For this research, general methodological guidelines should be specified.

- First of all, so as to ensure an enriching crossbreeding process and the coherency of this approach, information exchange processes should be developed between the various research teams.
- Also, it should be ascertained that the devices developed are sufficiently flexible and easy of use to guarantee that all voluntary VET providers will have access to them.
- The ECVET system must be conceived to maximally reduce the volume of resources to be mobilised for its implementation and management.
- Finally, because the system must also contribute to social inclusion, the developed devices and tools should be presented to ensure an effective access to all European citizens.

The implementation of the ECVET system supposes from the beginning that at least two competent authorities⁹ have developed a common or shared understanding as regards the totality or a part of a vocational qualification. Only on a common basis of understanding, will it be possible to erect units of learning outcomes.

For instance, a reference system for a profession shared by several competent authorities could be proposed to others willing to partake in an ECVET system as concerns this profession. The consultation document does not specify the tools, procedures and support that could be proposed to the competent authorities to establish, with full respect of the subsidiarity principle, this common basis of understanding. This type of specifications or at least the proposal of several tracks considered by the Commission would allow a better understanding of the project of ECVET system by endowing it with a more concrete background.

1.2.2 Fourth question: *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.*

In the current state of the consultation document proposed by the Commission, it is impossible to answer this question without more details as regards technical specifications.

The technical specifications proposed in the consultation document set forth a general system enabling to take into account the evaluation, validation, recognition, accumulation, transfer of learning outcomes whether formal, non-formal or informal¹⁰. To actually implement the ECVET system, it will be necessary to provide much more accurate technical specifications.

⁸ See comments on the fifth question as concerns credit points.

⁹ Competent authority : any national, regional, local or sectoral authority, institution or organisation that, in compliance with enforceable rules and praxis in the involved country, is responsible for one of more of the offices related to the implementation of ECVET or involved in one or more of these offices.

¹⁰ It is of importance to draw the attention of the reader to the fact that both research studies funded in 2006 by the Commission (ECVET Connexion and ECVET Reflector) focused their activity on initial vocational education and training. The consultation document of the Commission proposes only few specific technical data as concerns the

See also our answer to the third question.

The CEF insists that there should be no ambiguity as regards the value of the units of learning outcomes. If we agree to regard a given whole of units of learning outcomes as being constitutive of a qualification and likely to contribute to an enhanced readability of it, this whole of units can in no way be deemed to be such a qualification. It exclusively pertains to competent authorities to determine the process for a holder of units of learning outcomes to effectively be granted a qualification. In the French Community of Belgium Wallonia-Brussels, the competent authorities consider that the capacity of the holder of units of learning outcomes to combine the knowledge, aptitudes and competencies referenced in those units should furthermore be checked through an integrated proof¹¹.

The CEF appreciates the consultation process initiated by the Commission and wishes it to be continued during the next stages of the project.

1.2.3 Fifth question: Are the allocation of credits 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 consultation text gives precedence to the informative role of credit points: "ECVET credit points constitute an additional information source in digital presentation". On the other hand, in the slide presentation accompanying the consultation document, the Commission presents transfer processes, units and credit points as being the three pillars of the ECVET system.

This we cannot accept.

Even though the consultation document should be viewed as the only valid one, any ambiguity resulting from credit points should be removed. **The CEF specifically singles out two of them:**

- First, the CEF considers that a tool made to simply produce a simple representation of the value of a unit of learning outcomes in contrast with a complete qualification organised by a given competent authority, can in no way be presented as a pillar of the ECVET system. It is not necessary to define credit points to develop units of learning outcomes and to implement transfer and accumulation processes of those units. Credit points are therefore a tool, among others, which a competent authority could use to allow a better understanding of the relative value of a given unit of learning outcomes in contrast with the qualification it is part of.

A fictive example: two competent authorities could organise two different qualifications in the sector of bakery. An authority could only consider delivering the qualification to a baker's worker and the other one the qualification of a baker-pastry chef. In this context, a unit of learning outcomes that would be constitutive of both qualifications would be given a different relative value.

Baker's worker

Unit A (including the competencies relative to bread baking) can represent 60% of the qualification with a given competent authority, 45% with another.

Baker-pastry chef

Unit A (including the competencies relative to bread baking) can represent 25% of the qualification with a given competent authority, 30% with another.

evaluation, validation, recognition, accumulation, transfer of learning outcomes whether formal, non-formal or informal, whereas there exist, in the European field, a great many information sources.

¹¹ Integrated proof = any form of proof through which the person shows he/she is capable of combining all his/her outcomes and as a consequence to practise the job.

Each competent authority grants the title resulting from its training. In comparison with the example given above, the interest of the ECVET system would be to give visibility to the outcomes of the A unit of learning outcomes and to allow the transfer and the accumulation from one competent authority to another.

- Furthermore, any confusion should be prevented with the ECTS system developed within the framework of the Bologna process that led to the definition of study levels (Bachelor, Master and Doctor) which are represented by a given amount of credit points. As a great many actors on the field of the VET system directly associate the use of credit points with the Bologna process, huge is the risk that a rejection of the ECVET system will be generated, fuelled by the fear to be led to a harmonisation of vocational qualifications.
- Also, a definition of the "profession" concept will have to be adopted so as to allow the coverage of all possible realities, this by highlighting, for instance, the greatest common denominator of all competent authorities (profession heart) and possible national and regional specifics. As you know, the same profession can cover very differing realities from one country to another, from one region to another; it is more important to meet the needs at the local level than to build a qualification on the basis of hypothetical common average needs. Mobility should not rest on the "normalisation" of qualifications but on their transparency and the actual activation of transfer and accumulation processes.
- Adhering to the ECVET system should not be subjected to the alignment on a same level of the EQF (European Qualification Framework) of all qualifications relative to a given profession, among other things as a consequence of the huge differences sometimes existing between countries as regards one same training.
- Higher education is meant for much less heterogeneous audiences than those met in VET systems where, to meet the specific needs of the publics, many diverse types of training itineraries (training at school or training centre and training in professional surroundings) are set up. In this context, the same qualification can result from learning processes differing from one another through their duration, organisation, requirements.... This diversity of proposed itineraries ensures the richness of our society. You cannot exclude the risk of a convention regarding credit points ushering with time into an impoverishment of implemented education and training approaches, because it will then be necessarily to reach an agreement on an average common model of reference training itinerary.

To ensure every mobility (geographical, social, sectoral ...), it is not necessary to impose a single unified European vision for each profession and learning processes. The ECVET system cannot aim at harmonising the European qualifications delivered by all competent authorities of the Union but should facilitate mobility thanks to the capacity to transfer and accumulate units of learning outcomes. With this in mind, a same unit of learning outcomes will have the possibility to constitute a part of several different qualifications. Each qualification resting as well on the structuration of each VET system as the regional and national levels.

Therefore, different competent authorities will be able, if they deem it necessary to ensure the readability of their own qualification system, to award varying credit points to a given unit of learning outcomes. As points only contribute to enhancing the readability of every qualification system, the CEF considers that they should not obligatorily be integrated in partnership agreements and that, in the end, they would most probably contribute to endanger their elaboration.

Any reference to agreements concerning the attribution of credit points could entail a confusion between the objectives and working principles of the ECTS systems and ECVET, which should be avoided at all costs. The ECTS system pertains to higher education and is in keeping with its culture; on the other hand, the ECVET system should address working modes and cultures of

very differing actors, from qualifying education (VET) to vocational training and professional insertion.

1.3 Implementing ECVET

1.3.1 Sixth question: *Under what conditions could describing qualifications in term of learning outcomes and expressing them in units effectively improve the transparency of qualifications and contribute to the development of mutual trust?*

The transparency of qualifications will only be possible if all competent authorities willing to contribute voluntarily to the ECVET system agree:

- on common definitions of the various concepts used in the system,
- on a common methodology to describe a vocational qualification relating to a given profession in various knowledge levels, aptitudes and competencies,
- on systems of quality insurance.

A good understanding and the development of mutual trust will also depend from the usage of languages. The ECVET system should adopt a multilingual and multicultural approach. So, we refuse drifting into any situation where the partner competent authorities of an ECVET system would be compelled, for instance, to produce documents, an Internet site ... in another language than that used during the training itineraries. The ECVET system will only develop if it proposes a genuine solution to the needs of all users and more specifically of the weakest, and, if possible for all teachers and trainers as well as for all social partners involved to understand it and so to get involved through the access to texts and tools in their own language.

1.3.2 Seventh question: *Which criteria or combinations of criteria for allocating credit points could be selected and used?*

Since the CEF considers that credits points should not¹² be included in the contents of the partnership agreements and since credit points are only a means, among others, to express the relative value of a unit of learning outcomes in contrast with a certification delivered by a given competent authority, no criteria or combination of criteria should be given precedence. This issue strictly pertains to each competent authority.

The chapter concerning credit points should, therefore, be removed from the technical specifications of ECVET or only be appended for illustration purposes.

1.3.3 Eighth question: *Are there any features in your qualifications system which would favour the introduction of ECVET? What constraints, if any, do you foresee?*

Currently, the French Community Wallonia-Brussels would welcome the introduction of a system of learning units, as all French-Speaking Belgian governments, for the moment being, wish to empower an evolution of vocational education and training systems they organise or subsidise. In coherence with the various governmental statements and the new decree provisions¹³, the CEF has specified a series of common future objectives for our VET system:

- learners should be empowered with the competencies expected from them by the labour market as well during the initial training as during continued training, in full respect of the specific missions of each provider (for instance, the humanistic training in the framework of education),

¹² See answer to the fifth question.

¹³ For instance: the Dispositif intégré d'Insertion socioprofessionnelle (Integrated System of Socio-professional Insertion- Decree Walloon Region 1st April 2004) in which it is stipulated that each provider ensures the transparency of its insertion and training offer which should fit into the framework to set up study itineraries and transitions between training and insertion providers of the system.

- users should be given a higher readability of the education and training system,
- the number of learners leaving the VET system without an acknowledgement of the acquired competencies should be reduced,
- young people dropping out of school should be allowed to receive a partial acknowledgement of their knowledge so as to facilitate a possible resuming of training,
- actually develop a VET system enabling to concretise a project of lifelong learning, and so:
 - ◆ facilitate the transition from one provider to another,
 - ◆ facilitate resuming a training and so increase the access to continued training,
 - ◆ remove compartmentalising school itineraries and develop synergies between establishments and providers,
- increase possibilities to valorise acquired competencies in various school itineraries and with various providers,
- optimising the coherency of the vocational education and training system whatever the provider¹⁴,
- facilitate the valorisation of acquired competencies when there is a new careers guidance.

With this in mind, the production of two types of tools is considered and debated:

- to develop a common understanding among players, in the CFWB¹⁵, it is being considered to produce common profession profiles from which, with full respect for the missions and aims of everyone, the providers of the vocational education and training system will elaborate their training offer,
- to facilitate transfer and accumulation processes, in the CFWB, it is being considered to develop a "common currency" between vocational education and training providers, i. e. coherent wholes of knowledge, aptitudes and competencies that could be evaluated for certification and acknowledged by all providers of the VET system.

The CEF notes that the future aims and developments of our VET system are not incompatible with the general technical specifications presented in the consultation document.

1.3.4 Ninth question: *How and within what timeframe (launch, introduction, experimentation, widespread introduction) could ECVET be implemented in your country?*

The Belgian French-Speaking VET system is entering a reforming process that is not compatible with the development of the ECVET system.

The production of common profession reference systems, of a possible system of units of learning outcomes and the development of principles of quality insurance represent a huge human, financial and legislative investment. This implies that implementing an ECVET system could only be viewed as a progressive process and that within the sectors of the VET system, varying rhythms of progress would be allowed for.

Implementing such a reform would require the planning of the various stages of the modifying process while ensuring at each stage that field players would have adequate human and financial means at their disposal.

¹⁴ For instance: using common profession reference systems.

¹⁵ Communauté française Wallonie-Bruxelles

1.4 Measures for supporting the implementation and development of ECVET

1.4.1 Tenth question: *What kind of measures should be taken at European and sectoral levels to facilitate the implementation of ECVET?*

It would be advisable to initiate three types of action:

- As a priority, research should be set forth to complete the ECVET technical specifications through research actions aimed at elaborating ECVET systems corresponding to specific professions.
- Transnational geographical mobility only concerns a very tiny fraction of the public of vocational education and training; its development will, in the eyes of field players, be difficult to justify as regards the enormous efforts and investments required for implementing ECVET. But, since the ECVET system aims at fostering all forms of mobility (geographical, social, sectoral ...) and since numerous States of the Union¹⁶ seem to utter needs in the field of mobility between national VET subsystems or among regional VET systems, it could be useful to actually mobilise field players in the framework of a modification project, to develop experiments with the ECVET system with the aim of enhancing mobility of citizens at a regional level or between national subsystems.
- The ECVET system will only be able to develop and acquire justification if a very great number of partnership agreements are concluded between competent authorities. This type of approach requires multiple meetings between field players who are preparing the agreements to be signed. To foster trust and a genuine wish to work together, it would be useful to encourage within the framework of action programs field players moving.

All this supposes the support from specific European funds and also a support in the field of research and accompaniment if we want to preserve a global coherence.

1.4.2 Eleventh question: *What documents, manuals and guides could be developed to facilitate the implementation of ECVET?*

Field players require flexible tools and procedures that they could adapt to their specific needs. For instance, one could:

- produce, for VET providers and all citizens, specific popularisation documents (texts, CD, video ...) accessible in all official languages of the Union,
- produce compendia of “experiments” detailing difficulties met with, solutions found and tools built,
- organise peer learning activities,
- constitute a group of competent and enthusiastic resource persons with field experience as a basis, who are specially gifted for communication and able to support future partnerships using the ECVET system. To be sure to fully grasp the diversity of the vocational education and training systems situations, it would be useful for those “supporters” to stem from different fields of VET.

¹⁶ See data collected in the framework of the ECVET Connexion research

1.5 Questions related to the potential for enhancing mobility

1.5.1 Twelfth question: *To what extent and how will ECVET be able to contribute to the development of transnational and even national partnerships?*

For a citizen, the relative value of a given unit of learning outcomes shall foremost be linked to the number of competent authorities capable to validate¹⁷ and acknowledge the learning outcomes pertaining to that unit. In the same way, for a competent authority, the investment necessary to take into account a unit system of learning outcomes will only be justified if these units are validated and acknowledged by other competent authorities. Social and institutional desirability as regards the ECVET system will, therefore, most probably be linked to its expansion and to the number of signed partnership agreements.

If the ECVET system has a large visibility as a consequence of actions aimed at public opinion, it will itself become a motor of new partnerships to meet needs.

1.5.2 Thirteenth question: *To what extent and how will ECVET be able to help improve the quality of Community programmes on mobility and participation in these programmes?*

The Socrates and Leonardo da Vinci programmes have developed mobility actions towards students and learners during their initial training and for a limited duration. This mobility depends on European funding and is limited by it. The ECVET system will change nothing to this, but it could be an incentive for all learning to live mobility experiences. Referring to the ECVET system will most possibly contribute to an improvement of the quality of Community programs targeting vocational education and training in as far as these programs will allow participants to acquire units of learning outcomes constitutive of qualifications.

1.5.3 Fourteenth question: *To what extent and how do you think that ECVET and Europass could complement each other to enhance mobility?*

Europass could be a tool for communication enabling a mobile citizen to receive full valuation of his units of learning outcomes.

¹⁷ A competent authority "validates" when it accepts a unit as evidence of learning outcomes of a person and "acknowledges" when it takes that unit into account to grant a qualification.