

Thematic Seminar on Tools for VET Learner Mobility Brussels, 3-4 October 2019

BACKGROUND PAPER

Introduction

The document provides insight into the focus of the *Thematic Seminar on Tools for VET Learner Mobility*, highlighting the role that ECVET plays in the delivery of transnational learning mobility. It describes the specific tools and templates and the role that these play (and might play) in delivering vocational education and training (VET) mobility programmes. It also considers the value and potential of digitalisation in relation to this.

The Role of ECVET in Mobility

From the beginning, transnational learning mobility has been at the heart of ECVET. Originally intended as a credit system for VET, similar to that known and used in higher education (European Credit Transfer Systems or ECTS), ECVET has come to represent a key function and feature in learning mobility in VET. Whilst ECVET principles, such as the use of learning outcomes and mechanisms to facilitate transfer and recognition, in some cases extend to wider VET systems and provision, ECVET's greatest success has been in facilitating the design, development and delivery of vocational learning mobility. Notably, however, the primary impact of ECVET has not been as an EU system for credit transfer - it never came to assume this function along the lines of the ECTS due (among other things) to the diversity and heterogeneity of European VET systems. Rather, ECVET has been conducive to the delivery of three other areas of impact: improved quality in VET mobility; creation of a common language for VET mobility practitioners; and the adoption of common tools and templates.

Arguably, the most recognisable contribution of ECVET has been to the propagation of quality in VET mobility by positioning learning outcomes as the core criterion for this. Whereas previously, the value of mobility was often measured mainly in terms of numbers, the ECVET approach has been not to focus on the number of participants, but on what these participants bring home with them in terms of knowledge, skills and competences. This might sound trivial, but it is in fact a crucial change of perspective, which has had consequences for the way in which mobility programmes are planned and implemented. To achieve stipulated learning targets or objectives, these need to be communicated in a transparent and systematic way that can be understood by both learners and those in charge of the learning environment in the host country, and they must be of a nature that lends itself to objective assessment. This is another way of thinking mobility, and not as easy as it may sound. Yet not only has ECVET directed mobility organisers' attention to this, but it has also provided practical assistance, both through dedicated information and guidance material on the formulation of learning outcomes and through the efforts of the national teams of ECVET experts that have been set up in different European countries.

A second yet no less important area of impact has been that of creating a "common language" for organisers of VET mobility projects. This refers not only to the words and concepts that ECVET has introduced, but also to frameworks and processes such as the sequence of "assessment, validation and recognition", which has been generally accepted across the board and which has served as a framework of reference for recognition in VET mobility projects and programmes. Prior to ECVET, many different linguistic terms were used, which made mutual understanding across borders a challenge and, even when the same terms were employed, they could be (and often were) interpreted in different ways. By providing key terms and clear definitions, ECVET has significantly reduced communication barriers between sending and hosting organisations across Europe when planning and implementing mobility activities.

A final achievement of ECVET in connection with VET mobility, and one which forms the subject matter for this background paper, is the production of some very concrete tools in the shape of templates for key documents used in developing and delivering VET mobility programmes, namely the Memorandum of Understanding (MoU), which is a document signed between the sending and the receiving “competent bodies”, giving the overall framework of the mobility programme and the accompanying Learning Agreement (LA), which gives precise details on learning objectives for individual participants, confirming how these are to be achieved, assessed, validated and recognised.

Reviewing Tools for VET Mobility: A ‘Core and More’ Approach

Several years have passed since the existing tools and templates were last updated, and many practitioners have called for a revision of existing tools to ensure their continued relevance. In considering the potential for future updates, there is an opportunity to also reflect on wider landscapes and the bigger picture, looking beyond content and structure and considering the potential role of these tools in facilitating European VET mobility.

It is important to recognise that whilst the tools and templates have predominantly been used in the context of the Erasmus+ programme, other VET mobility programmes do exist (though their size doesn’t compare to Erasmus+). In fact, and as several recent studies¹ have documented, VET mobility is clearly more than those activities financed through the Erasmus+ programme, with an undergrowth of schemes and initiatives that promote cross-border VET-mobility at national, bi-national and multinational level. It is acknowledged, however, that relatively few of these schemes make use of ECVET tools and templates - some because they have developed their own procedures and templates for assessment, recognition and validation, others because they operate in contexts where this is not considered a major issue.

In this respect, it seems a waste of time and effort to develop VET mobility templates in different (and separate) contexts. The question that we must therefore ask is why there has not been a greater take-up of ECVET tools and templates in non-Erasmus+ mobility contexts. Arguably, this might be because of a simple lack of awareness, with non-Erasmus+ mobility promoters unaware of their existence but this may only be part of the explanation. Equally, whilst there are no dedicated studies to confirm this, anecdotal evidence suggests that the present ECVET templates are considered by some users to be too detailed, with some elements perceived as valuable yet with other aspects considered less relevant for the context in which they operate. As part of any future revision or updating process, therefore, it would be helpful to try and examine tools and templates across a broader user-perspectives and landscapes, confirming those elements which are perceived to be necessary and other elements which are “nice to have”. In other words, what is ‘core’ and what is ‘more’ in the present versions, and how we can ensure that potential new users are not frustrated by feeling obliged to provide information that is deemed repetitive (i.e. because it has already been supplied in other documents) or irrelevant. A comparative analysis of wider tools and templates, including those used in other fields of educational activity (e.g. higher education) and those developed by frontline VET mobility practitioners operating within and beyond Erasmus+, will provide useful indications in this respect.

However, it is important to not only focus on the content of VET mobility tools and templates but also on methods and mechanisms for their delivery and use. Considering, for example, whether it is possible to extend the use of digital technologies, allowing users to customize templates to specific contexts and providing for smoother administrative and data transfer procedures that allow information to be automatically transferred from one document or phase of mobility to another and avoiding unnecessary exchanges of paper-based documentation through the creation of a wholly electronic document flow among those involved in delivering VET mobility.

¹ “Study on VET-mobility in Europe: analysis of take-up, provision and impact” (ICF, 2019) and “Study on mobility developments in school education, vocational education and training, adult education and youth exchanges” (ICON, 2012). Both studies were financed by the European Commission

Tools for VET Mobility: Comparative Analysis

What tools and models already exist?

Building on a wealth of past developments and experience, and with a view to facilitating inter-institutional partnerships and the delivery of mobility programmes in the field of VET, the ECVET User Group produced common European templates for a *Memorandum of Understanding and Learning Agreement* in 2013. Templates were produced in three languages (EN, FR and DE) and were actively promoted via the network of national agencies for the Lifelong Learning Programme (subsequently Erasmus+) and hosted in the ECVET Mobility Toolkit (www.ecvet-toolkit.eu).

☞ The Memorandum of Understanding (MoU) is a voluntary agreement between two or more institutions which sets out the framework for learning delivery, formalising the ECVET relationship and confirming an acceptance of the status and responsibilities that each partner institution has in relation to learning recognition.

☞ The Learning Agreement (LA) is a document signed by all parties in the mobility process, including the learner, in which the learning duration and expected learning outcomes are confirmed alongside mechanisms for assessment, validation and recognition.

Whilst the templates were quickly confirmed as a valid and useful addition, it soon became apparent that these documents added to, rather than replaced, existing tools and templates that were being either voluntarily or compulsorily used by those developing and delivering mobility programmes. For example, in addition to these templates, which had been primarily developed to facilitate the use of ECVET principles in delivering high-quality mobility in the field of VET, there were numerous other documents in circulation, many tied to the delivery of European programme funding for learner and staff mobility (i.e. Erasmus+ Key Action 1).

A quick review of existing documents, at the point of preparing this paper, confirms the following models and templates in active use by those delivering European-funded mobility programmes. For the purpose of this background paper, and to offer a counterpoint to the field of VET, examples from mobility in the field of higher education have also been included.

Institutional Level

- ECVET Memorandum of Understanding - Template;
- Erasmus+ Inter-institutional Agreement between Programme Countries;
- Erasmus+ Inter-institutional Agreement between Programme and Partner Countries.

Individual Level (Students/Learners)

- ECVET Learning Agreement - Template;
- Erasmus+ Learning Agreement for VET Mobility;
- Grant Agreement for Erasmus+ VET Traineeships²;
- Grant Agreement for Erasmus+ Studies/Traineeships within Programme Countries;
- Grant Agreement for Erasmus+ Studies/Traineeships between Programme and Partner Countries.

Individual Level (Staff)

- Erasmus+ VET Staff Mobility Agreement / Work Programme;
- Grant Agreement for Erasmus+ Staff Mobility for Teaching and Training.

² can also be used for other types of Erasmus+ learner mobility + in the field of VET (i.e. non-traineeships)

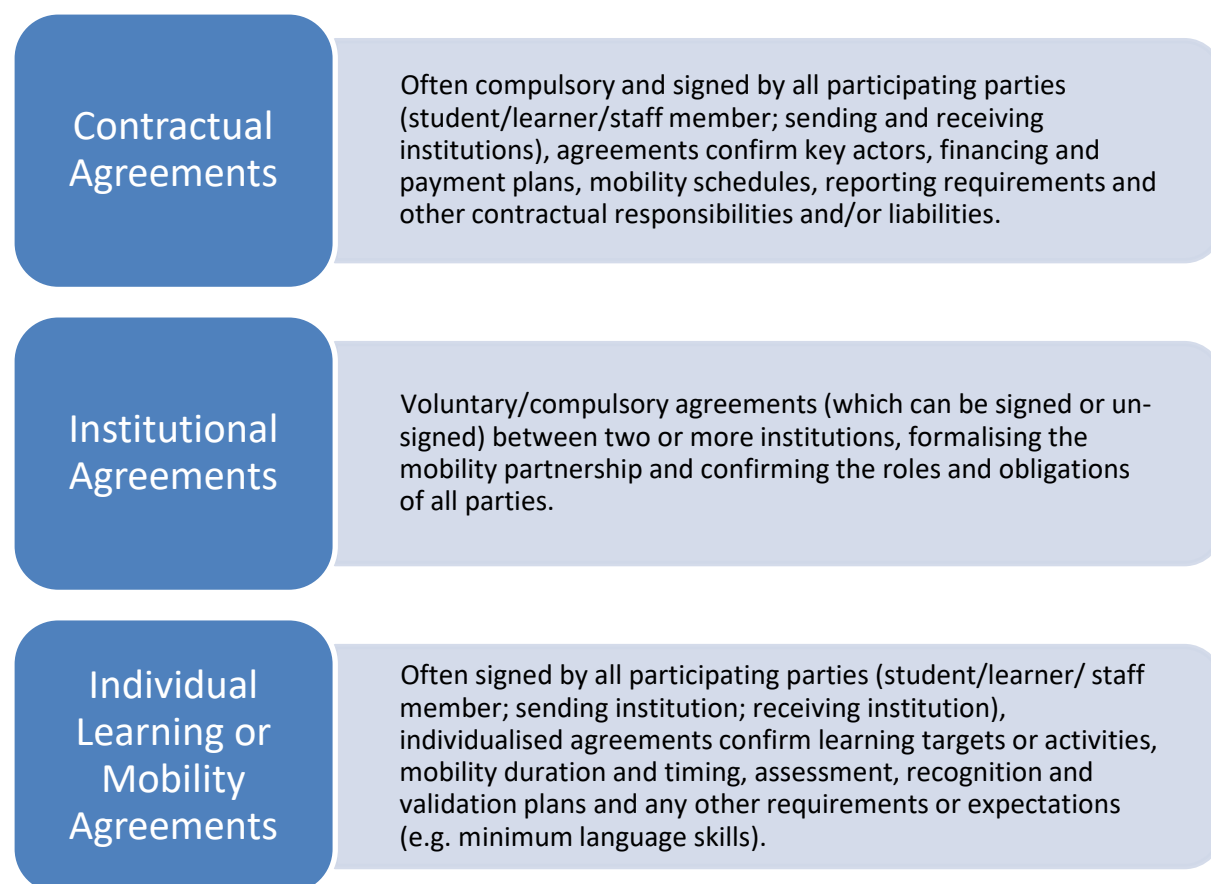
A small number of complementary documents also exist in which additional insight is given into the obligations or commitments of different mobility actors (i.e. learners/students; staff; sending and receiving institutions):

- Erasmus+ VET Mobility Charter;
- Erasmus+ VET Mobility Quality Commitment;
- Erasmus Charter for Higher Education (ECHE).

These are complemented by a plethora of guidance materials produced by those managing or delivering VET mobility programmes, including project handbooks, guidelines and case studies. The ECVET Mobility Toolkit also provides numerous examples of completed memoranda or agreements and a wealth of supporting materials, including learning outcomes descriptions, can be accessed from projects that have focused specifically on ECVET or VET mobility (e.g. www.ecvet-projects.eu/; <https://ec.europa.eu/programmes/erasmus-plus/projects/>).

How do these compare?

An initial review of the above-referenced models and templates confirms these to be of primarily three types:



Whilst *Contractual Agreements* do not form a part of the core suite of ECVET tools and templates and are therefore not considered in the tables that follow, it is important to recognise that such documents exist and to consider how future VET mobility templates might complement rather than duplicate the content of these documents.

Memorandum of Understanding (MoU)

The table below specifically considers models or agreements which aim to govern or guide the delivery of mobility programmes for students/learners, at institutional level, comparing the content of the ECVET MoU Template against the Inter-institutional Agreement (used in the field of Higher Education) and against a small selection of other project-based models in which ECVET and/or VET Mobility is the predominant focus.

CONTENT	ECVET MoU Template (VET)	Inter-institutional Agreement (HE)	COLOR Project	M.O.T.O. Project	ICare Project
1. Objectives of the MoU	❖		❖	❖	❖
2. Organisations (signing MoU)	❖	❖	❖	❖	❖
3. Other Organisations (covered by MoU)	❖		❖		❖
4. Qualification(s) Covered by the MoU	❖		ANNEX	❖	❖
5. Assessment, Validation and Recognition	❖	ECHE		❖	❖
6. Validity of the MoU (end date)	❖		❖	❖	❖
7. Evaluation and Review Process	❖				
8. Signatures	❖	❖	❖	❖	❖
9. Additional Information (e.g. grading, quality; housing, language)	❖	❖			
10. Annexes	❖		❖	❖	❖
11. Mobility Flows (students; staff)		❖			
12. Mobility Calendar		❖			

If we consider the aforementioned 'core and more' approach, each of the reviewed examples includes the following elements which might therefore be perceived as core:

- OBJECTIVES OF THE MOU - notably, this is not the case for the inter-institutional agreement for higher education, where the purpose of the document is seemingly well known;
- ORGANISATIONS (participating);
- QUALIFICATIONS - in one case this detail is provided in a separate annex;
- VALIDITY OF THE MOU (end date) - not included in the inter-institutional agreement for HE;
- SIGNATURES;
- ANNEXES.

Beyond this, the following elements are included only in some field- or project-specific examples:

- ORGANISATIONS (wider) - whilst most of the reviewed examples refer separately to participating and wider bodies and institutions, this is not the case for higher education or for all project-based examples; anecdotal evidence also suggests that signing of an MoU is not in all cases limited to competent authorities;
- ASSESSMENT, RECOGNITION AND VALIDATION - in the inter-institutional agreement for higher education, and in one project-based example, assessment, recognition and validation mechanisms are addressed at individual rather than institutional level (i.e. LA rather than MoU);
- EVALUATION AND REVIEW PROCESS - notably, this important element centred on quality review and evaluation processes is only addressed in the European MoU template;
- ADDITIONAL INFORMATION - whilst templates for both VET and HE provide for the inclusion of additional information, there are few examples of this section being used with additional information most often included under ANNEXES;
- MOBILITY FLOWS - included solely in the inter-institutional agreement for HE;
- MOBILITY CALENDAR - included solely in the inter-institutional agreement for HE.

Learning Agreement (LA)

The table below considers, specifically, models or agreements which aim to govern or guide the delivery of mobility programmes at the level of an individual student/learner, comparing the content of the ECVET Template for the LA against a similar template used in the field of Higher Education³ and against a small selection of other projects and initiatives (including the *Vocational Training Worldwide* programme of the German Federal Ministry of Education and Research) in which VET Mobility is targeted.

CONTENT	ECVET LA Template (VET)	LA Template (HE)	DECVIP Project	EURIAC Project	Vocational Training Worldwide
1. Information about the Participants (home-host-learner)	❖	❖	❖	❖	❖
2. Duration/Timing of Mobility	❖	❖	❖	❖	❖
3. Existing Qualification / Components	❖	❖	❖		
4. Targeted Units / LOs / Components	❖	❖	❖	❖	❖
5. Assessment / Monitoring	❖	❖	❖	❖	❖
6. Validation / Recognition / Credits	❖	❖	❖		❖
7. Signatures	❖	❖	❖	❖	❖
8. Additional Information (e.g. language)	❖	❖	❖		
9. Annexes	❖		❖		❖
10. Amendments to Learning Objectives		❖			
11. Achievement of Learning Objectives		❖			

³ it is important to note that two versions of the Learning Agreement exist for the field of Higher Education, respectively covering student mobility for studies and student mobility traineeships; whilst each version addresses the core elements of mobility preparation, implementation and follow-up, the latter provides additional insight into the value and profile of the traineeship in the host country qualification, as well as providing details on the receiving enterprise, on placement delivery (e.g. traineeship programme, monitoring, evaluation and certification plans) and on accident insurance for the visiting trainee/student

If we consider the aforementioned 'core and more' approach, each of the reviewed examples includes the following elements which might therefore be perceived as core:

- INFORMATION ON PARTICIPANTS (home institution; host institution; student/learner);
- DURATION/TIMING OF MOBILITY – a mobility calendar is also included in the inter-institutional agreement for HE;
- TARGETED UNITS / LEARNING OUTCOMES / COMPONENTS – terminology differs by field of education, as does the level of detail that is provided under this heading;
- ASSESSMENT / MONITORING;
- SIGNATURES.

Beyond this, the following elements are included only in some field- or project-specific examples:

- EXISTING QUALIFICATION / COMPONENTS – some projects / institutions rely on a broader reference in the MoU to programmes or qualifications being targeted by one or more learners; others list specific qualifications and units for individual learners;
- VALIDATION / RECOGNITION / CREDITS - some country-specific examples (e.g. Finland); other cases where section is included for credit points yet not in all cases completed;
- ADDITIONAL INFORMATION - for example, minimum language requirements;
- ANNEXES - can include additional insights into the targeted learning outcomes (e.g. units or partial qualifications);
- AMENDMENTS TO LEARNING OBJECTIVES - included solely in the inter-institutional agreement for HE and suggesting that the learning agreement is a living document that can be updated during the mobility period;
- ACHIEVEMENT OF LEARNING OBJECTIVES - included solely in the inter-institutional agreement for HE and suggesting that a final comparison of targeted versus achieved learning.

Whilst a fairly limited review, it is important to note there none of the reviewed documentary examples aligns with a single or specific funding source (e.g. Erasmus+), which is a positive indicator of the potential for developing tools and templates for use with multiple, European and/or international, VET mobility programmes.

In relation to ECVET, it should also be added that it is not merely the templates (MoU, LA) that are available to mobility providers, but that there is also a significant amount of information and guidance material on tools and procedures, including many examples of good practice from across Europe. This can be accessed via the website of the ECVET Toolkit (www.ecvet-toolkit.eu). Additionally, national teams of ECVET experts have appointed to provide practical help and assistance to the process of implementing ECVET. Many, if not all, of these teams are organised in the framework of the National Agencies for Erasmus+ and provide valuable assistance to mobility projects financed via this programme.

Tools for VET Mobility: Digital Developments

The present templates for the MoU and LA are - and have been since their initial release - available for download from the website of the ECVET Secretariat (www.ecvet-secretariat.eu) and the ECVET Mobility Toolkit (www.ecvet-toolkit.eu). Users can populate and circulate these documents electronically but, as a rule, this mostly extends to documents being completed with typewritten data, printed, signed and scanned, rather than to anything more technical or automated. There is limited use, currently, of digital technologies being used to facilitate the document completion and/or transfer.

Contrarily, there are many that already recognise the potential benefits of using digital technologies to facilitate the development and delivery of VET mobility programmes, including:

- reduced administrative demands through the creation of electronic platforms where home and host institutions and funding authorities (including Erasmus+ national agencies) have shared to relevant data and documentation;
- increased access to data on the nature and type of participation in VET mobility through the introduction and use of attractive digital platforms and their subsequent promotion to VET mobility practitioners in Erasmus+ and beyond (with all due consideration of GDPR issues);
- reduced environmental impact from scaling-down, or completely abolishing, the use of paper⁴.

It is important however to distinguish between *digitisation* (process of converting information into a digital format) and *digitalisation* (transformation of work processes as a consequence of digitisation).

For example, it could be argued that by having the templates available for download is *digitisation* yet there are many degrees of sophistication in digitisation. Digitalisation, on the other hand, would in its ultimate form mean that all necessary documentation can be accessed - and all administrative procedures handled - from a single electronic platform. Digitised data would allow for automatic transfer between documents and would ease any updating or review processes. Within the context of past mobility programmes and initiatives (most notably, the Lifelong Learning Programme and Erasmus+), systems and procedures have undergone *digitalisation* through introducing electronic platforms for application and reporting and through allowing for data transfer therein. However, when it comes to the different steps in delivering VET mobility (i.e. before, during and after mobility), significantly less progress has been made. A positive example of progress is the new Europass, which will offer digital tools which will allow for the communication of skills and qualifications for lifelong learning and employability.

☞ **Europass:** in the future online portal (due to be launched in April 2020), the Europass e-portfolio will allow individuals to document their skills, including those achieved through learning mobility in the form of “Europass mobility” which can be included in an e-profile. The new portal will also ensure the continuity of Europass CVs created within the current online editor. For Europass mobility, data needs to be entered on the context and content of the mobility programme as well as providing details of host organisations (e.g. VET institutions, enterprises) with all data subsequently validated by the receiving institution. This allows for a Europass Mobility transcript to be generated in which the acquired knowledge and skills are detailed.

More detail will be provided on the new Europass at the forthcoming Thematic Seminar.

⁴ According to calculations made by the European Forum of technical and Vocational Training (EfVET), each participant in an Erasmus+ VET mobility project requires at least 50 printed pages of paper, which means that with 650.000 participants being targeted over the seven years of the Erasmus+ programme, 32.5 million pages will have been printed (see: www.efvet.org/wp-content/uploads/2018/09/V02.EfVET-VET-Mobility-paper-_good.pdf)

☞ **Erasmus Without Paper:** having received Erasmus+ financing for two successive projects, in 2015 and 2018, Erasmus Without Paper has taken progressive steps to reduce the paper-based workflow associated with the planning, delivery and follow-up of mobility in the field of higher education, introducing a digital workflow that builds on and streamlines existing technical solutions and reducing the administrative workload for mobility participants. Erasmus Without Paper aims to become a standard for data exchange in Higher Education providing tools to connect Higher Education Institutions (HEIs) active in delivering student mobility programmes.

More detail will be provided on Erasmus Without Paper at the forthcoming Thematic Seminar.

☞ **Erasmus+ Mobility App:** launched in 2017, the Erasmus+ Mobility App was jointly developed by the European Commission, the European University Foundation and the Erasmus Student Network with a view to simplifying and digitalising the student mobility process, providing participants with easy-to-access information on their forthcoming mobility experience; ongoing preparations for the new Erasmus programme have confirmed the importance of digitalisation and simplification and there are already discussions taking place as to how the Erasmus+ Mobile App might be further developed with a view to providing a single point of entry that assists higher education students, and other learners, at all stages of their mobility experience, providing online tools for programme administration as well as information and support at all stages of mobility.

More detail will be provided on the Erasmus+ Mobility App at the forthcoming Thematic Seminar.

Tools for VET Mobility: Future Steps

According to feedback from Erasmus+ National Agencies and ECVET national experts, the current ECVET templates (MoU, LA) have been widely adopted by those delivering by VET mobility projects under the heading of Erasmus+. This is additionally referenced in the *Study on EU VET Instruments*⁵, which refers to findings from the Erasmus+ mid-term evaluation in which 2014-2015 data suggests that 88% of mobile learners had signed a LA before their mobility period, with country-specific examples provided where use of the MoU and LA is either widespread (i.e. Slovenia) or considered a useful or valid means of facilitating recognition and/or ensuring a high-quality learning experience (e.g. Estonia, Italy). There is, however, little evidence of wider use (i.e. in other mobility schemes and initiatives, including those financed at national level). Another recent study mapped the use of VET mobility in Europe beyond Erasmus+⁶ and documented the existence of a large number of schemes at regional, national, bi-national and even multi-national level. The majority of these schemes were found to operate in initial VET (IVET) and in the framework of formal programmes and qualifications where issues related to assessment, validation and recognition are of paramount importance.

Some of these schemes have developed their own methods for addressing assessment, validation and recognition yet there were others for which all such issues were addressed on an ad hoc basis with no evidence of a systematic approach. The risks of this are obvious - if such matters are not given the required attention, learning outcomes might end up un-documented and/or un-recognised and, in some cases, this could mean that learning trajectories are being unnecessarily prolonged or that the skills developed by mobile learners remain invisible. In the light of this observation, one of the final recommendations of the study is to “promote and develop, as appropriate, EU tools that support the quality of mobility” with additional reference to the fact that “ECVET provides a well-developed framework to ensure the quality of geographical mobility in IVET and enable transparency of learning outcomes” and that “Practical ECVET tools to support VET centres in organising mobility projects (e.g. Memorandum of Understanding and Learning Agreement) are available” and have been “road-tested by Erasmus+ National Agencies and other mobility practitioners”.

Any future efforts centred on updating the current ECVET templates (MoU and LA) should therefore not be restricted to merely adjusting a few technical issues but should aim to provide, to the degree that this is not already the case, versions of these tools that make them attractive not just in an Erasmus+ programme context but also beyond. The challenge here is twofold. On the one hand, it is a question of marketing: making future tools known and available to all actors and not solely to those already involved in Erasmus+. Arguably more important is the challenge to ensure that these tools are perceived by users as relevant, intuitive and providing significant added-value. To reap the full value of digitalisation, however, ECVET tools and templates would also need to be considered alongside recent developments with Europass and Erasmus+, ensuring data compatibility and facilitating data transfer for those looking to make use of *Europass Mobility* or Erasmus+ mobility management tools. An alternative to this would be to develop, in an ECVET context, a dedicated personal transcript (transcript or records) document to complement existing tools and templates (MoU, LA) and embrace the full workflow connected with VET mobility.

As plans emerge for the new Erasmus funding programme, a separate opportunity exists for mapping the requirements of contractual and financing documents (for VET institutions and participants) against the data requirements of tools and templates which centre on facilitating the delivery of future VET mobility programmes, ensuring that all such models complement rather than duplicate data. The issue of digitisation and digitalisation is vital in all cases, moving through each of these processes step-by-and working, in the longer-term, towards an integrated, electronic administrative system, that can reduce administrative demands and environmental impact whilst providing for increased access to relevant data on the nature and type of participation in VET mobility programmes and initiatives.

⁵ European Commission/Directorate General of Employment and Social Affairs: Study on VET Instruments (EQAVET and ECVET). Final report. Luxembourg, 2019

⁶ European Commission/Directorate General of Employment and Social Affairs: Vocational mobility in Europe – analysing provision, take-up and impact. Final report. Luxembourg, 2019

Thematic Seminar: Key Questions

1. How usable are the ECVET tools and templates for non-Erasmus+ mobility?
2. Do you agree with the 'core and more' definition, and are the highlighted 'core' elements in the Memorandum of Understanding (MoU) sufficient? If not, what elements are missing?
3. Do you agree with the 'core and more' definition and are the highlighted 'core' elements in the Learning Agreement (LA) sufficient? If not, what elements are missing?
4. Are signatures important and how ready are we for digital signatures?
5. Are there elements of data which need to be specifically aligned with Erasmus+?
6. How does MoU content align with the core phases of VET mobility (before / during / after mobility)?
7. How does LA content align with the core phases of VET mobility (before / during / after mobility)?
8. How useful would it be to have a single electronic data flow and what data would need to be transferred between [a] the MoU and the LA and [b] the LA and assessment, recognition and validation processes?
9. Should MoU/LA templates be made electronically compatible with the Europass Digital Credentials Infrastructure model to facilitate data transfer or should a dedicated Personal Transcript (transcript of records) be developed for ECVET?
10. When considering plans for digitalisation, what aspects are important to consider with a view to meeting the requirements of the GDPR?