

European Credit System for Vocational Education and Training

Consultation Response Form

The closing date for this consultation is: 15 March
2007

Your comments must reach us by that date.

department for

education and skills

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THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online or offline response facility available on the Department for Education and Skills e-consultation website (<http://www.dfes.gov.uk/consultations>).

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

Please tick if you want us to keep your response confidential.

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If your enquiry is related to the policy content of the consultation you can contact Carol Rowlands on:

Telephone: 0114 259 4151

e-mail: carol.rowlands@dfes.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888

Fax: 01928 794 311

e-mail: consultation.unit@dfes.gsi.gov.uk

Please mark an X in the box below which best describes you as a respondent:

<input type="checkbox"/> Training Institution or Organisation	<input type="checkbox"/> Education Institution	<input type="checkbox"/> Professional Body or Association
<input type="checkbox"/> Employer or Employers' Organisation	<input type="checkbox"/> Trade Union	<input type="checkbox"/> Central/ Local Government or Government Agency
<input type="checkbox"/> Statutory/ Regulatory Body	<input type="checkbox"/> Qualification Authority or Awarding Body	<input type="checkbox"/> Voluntary or Community Organisation
<input checked="" type="checkbox"/> Other (please specify)		

Please Specify:

Sector Skills Council

Please indicate the part of the UK that you work with:

<input type="checkbox"/> England	<input type="checkbox"/> Northern Ireland	<input type="checkbox"/> Scotland
<input type="checkbox"/> Wales	<input checked="" type="checkbox"/> X Whole UK	

The purpose of and reasons for an ECVET system

1 a) 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?

Yes

X No

Not Sure

Comments:

The importance of the system for mobility of workers and recognising work performance is not encompassed.

1 b) If not what is missing?

Comments:

The focus is limited to people learning rather than the broader economic and social benefits of workforce development which can be transferred, accumulated and recognised throughout Europe and globally. The focus should also be on businesses being able to transfer production, requiring specialised occupational knowledge and skills, which can be developed, provided and recognised by people throughout Europe.

This will be facilitated by a system which validates the outcomes in terms of transparent competence/knowledge and skills requirements (not just validating the outcomes of learning and the transparency of qualifications).

It needs to facilitate the recognition of home nations' industry certification systems for workers which are currently based on home nation's specific qualifications.

The focus needs to be on learning and competence so people can recognise

what people have learnt and also if they are competent in specified occupational activities.

The system needs to provide learning pathways between academic/educational and vocational training systems helping people fill gaps in their knowledge and skills.

The system needs to be based on units covering clearly identified areas of learning and competence, not just full qualifications. Mobile workers/learners/employers require unit size learning and certification of specialised areas of skills/knowledge.

A 'common currency' of learning/skills/competence is needed to which units can relate – such as that provided by National Occupational Standards, which provide an objective means of identifying recognised portable outcomes achieved.

1 c) What would be the main added value of the planned ECVET system?

Comments:

Development and recognition of a skilled European workforce allowing mobility of people and work across the Union and assisting with global competitiveness.

The technical basis for ECVET

2 a) 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?

X Yes

No

Not Sure

Comments:

Unit based system, not just full qualifications.

Education/academic based learning; vocational training; assessed workplace development.

Certification of unitised coverage of both:

- underpinning knowledge and skills
- competence.

The vocational education and training standards needed are best described in the European Training Foundation International Manual 'Linking Vocational Education and Training Standards and Employment Requirements' (2001):

What does the student need to be able to do in employment? The employment specification

What does the student need to learn to be effective in employment? The learning specification [the curriculum]

How will we know what the student has learned and is able to do in employment? The assessment specification

Essential components are: outcomes of learning and performance, range/scope of coverage; assessment criteria supported by quality assurance of processes; basis against national standards.

Recognition of the role of awarding bodies and industry certification schemes for sectors' workforces.

If Credit is to be used it must be based on actual knowledge and skills acquired, not an artificial, subjective number/weighting/value - a structured approach using component parts of the Unit must provide the soundest basis for identifying credit rating ie. remove as much subjectivity as possible.

The characteristics of units must help learners, employers (current/future) and providers identify people's knowledge and skills/competence not just the 'weight' of their achievements.

2 b) 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.

Yes

X No

Not Sure

Comments:

No. See previous comments.

2 c) 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 do you suggest?

Yes

X No

Not Sure

Comments:

No. Credit based on points/numbers/notional learning time is not appropriate.

People need to be able to identify what competence/knowledge and skills people actually have or need to develop.

If Credit is to be used it must be based on actual knowledge and skills acquired, not an artificial, subjective number/weighting/value - a structured approach using component parts of the Unit must provide the soundest basis for identifying credit rating ie. remove as much subjectivity as possible.

Implementing ECVET

3 a) Under what conditions could describing qualifications in terms of learning outcomes and expressing them in units effectively improve the transparency of qualifications and contribute to the development of mutual trust?

Comments:

Outcomes are essential – however, the expression ‘learning outcomes’ can be restricting, since this may imply formalised acquisition of knowledge alone. It is more important to consider actual outcomes in relation to workplace performance/competence as well as knowledge - not just notional values.

3 b) Which criteria or combinations of criteria for allocating credit points could be selected and used?

Comments:

One which identifies actual underpinning knowledge and skills/competence not just learning hours/notional weight/values.

If Credit is to be used it must be based on actual knowledge and skills acquired, not an artificial, subjective number/weighting/value - a structured approach using component parts of the Unit must provide the soundest basis for identifying credit rating ie. remove as much subjectivity as possible.

3 c) Are there any features in your qualifications system which would favour the introduction of ECVET?

Comments:

ECVET needs to provide features which enhance the sector's system by providing a European system for identifying and specifying people's knowledge, skills and competence rather than the system having to fit an ECVET system based on notional values of learning which does not add value to the sector's employers, learners and providers.

A Credit based system actually works against what we are trying to focus on – achieved competence and knowledge.

3 d) What constraints if any, do you foresee?

Comments:

Availability of funding.

Ability to benchmark with other nations' construction qualifications.

Lack of occupational standards in other European nations to provide the benchmark for knowledge, skills and competence requirements.

Lack of European network of sector based bodies like sector skills councils.

UK currently having to focus on four home nations' government driven initiatives rather than sector European lead frameworks.

3 e) How and within what timeframe (launch, introduction, experimentation, widespread introduction) could ECVET be implemented in your area?

Comments:

Depends on UK home nations' implementation of the sector qualification reform programme in line with Leitch.

Measures for supporting the implementation and development of ECVET

4 a) What kind of measures should be taken at European national and sectoral levels to facilitate the implementation of ECVET?

Comments:

Establishing sector based networks so learners and employers can benefit within a sector.

Develop frameworks of Occupational Standards that form a 'common currency'.

4 b) What documents, manuals and guides could be developed to facilitate the implementation of ECVET?

Comments:

Links by website with home nations' and sector organisations.

The vocational education and training standards needed are best described in the European Training Foundation International Manual 'Linking Vocational Education and Training Standards and Employment Requirements' (2001)

ECVET's potential for enhancing mobility

5 a) To what extent and how will ECVET be able to contribute to the development of transnational and even national partnerships?

Comments:

A network is needed of sector based European vocational education and training organisations including UK Sector Skills Council. Links also need establishing outside Europe.

5 b) To what extent and how will ECVET be able to help improve the quality of Community programmes on mobility and participation in these programmes?

Comments:

It will be limited at first as people's existing qualifications/units will be outside the system. Mobility and efficient participation will only be facilitated if the system of credit identifies knowledge and skills rather than notional values.

5 c) To what extent and how do you think that ECVET and Europass could complement each other to enhance mobility?

Comments:

Europass has a competence-based approach which ECVET would do well to follow.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

Here at the Department for Education and Skills we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes No

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: <http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 15 March 2007

Please complete the on-line questionnaire on this website.

Further comments can be e-mailed to Ecvet.CONULTATION@dfes.gsi.gov.uk

or posted to: Rob Kettell, Level 5C, Caxton House, Tothill Street, London SW1H
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