

Commission Staff Working Document on the
European Credit System for Vocational Education
and Training ECVET
A system for the transfer, accumulation and recognition
of learning outcomes in Europe

7th March 2007

Dear Commissioner,

Response to the Consultation from the:
England, Wales and Northern Ireland Credit Forum

I am pleased to submit this response on behalf of the EJNI Credit Forum. The Credit Forum comprises members representing organisations and institutions in the learning and skills sector and the higher education sector in England, Wales and Northern Ireland. The individual members are very experienced in the design of systems, frameworks and the delivery of credit based curriculum.

We value this consultation exercise on the ECVET and recognise that the Technical Working Group has invested much effort in the development of the proposal. The learning outcomes approach is very much endorsed by the Credit Forum. In October 2006 we commended the European Qualifications Framework for Lifelong Learning for its simplicity and we have noted that ECVET is intended to relate to the European Qualifications Framework. We will respond below to some of the broader questions posed in the consultation document and we will also make some remarks regarding technical points.

4.2.1 The purpose and reasons for an ECVET system

We wish to make a general point which is not intended to be a criticism of the ECVET.

The EJNI Credit Forum observes that there are four different credit and/or qualification systems and frameworks currently developing in Europe. These are the Framework for Qualifications of the European Higher Education Area (FEHEA), the European Credit Accumulation and Transfer System (ECTS), the European Credit System for Vocational Education and Training (ECVET) and the European Qualifications Framework (EQF). The first two relate to all learning in higher education, the third relates specifically to vocational education and training and the fourth relates to lifelong learning at all levels. Otherwise, they are presented as separate and the descriptions make minimal reference to one another. Even this 17 page consultation document setting out the ECVET does not present the eight levels of the EQF to which it relates directly and ECTS with which it could be said to overlap is not mentioned until page 14.

We believe that this situation is complicated and potentially confusing to the many stakeholders. In the long term it will be unacceptable and questions will be asked by nation states as to why this was allowed to happen. It does not make sense to ring fence types or levels of learning and devise separate specific systems or frameworks. Vocational education and training may be undertaken successfully at any level including higher education levels.

Therefore we recommend [urge] that efforts are made to rationalise the European systems and frameworks. One system should suffice. We note that the European Commission plans to conduct a review of ECTS. We believe that the need is for a single credit accumulation and transfer system which encompasses academic and vocationally orientated learning at all the EQF levels. It is important that the system accommodates the different pace at which students in different circumstances are able to learn in the true spirit of life-long learning.

4.2.2 The Technical basis of ECVET

Our experience in the United Kingdom is that in regard of vocational education and training employers want their employees to gain competence in relevant skills by which we mean that employees can undertake the tasks consistently and reliably. This focus on competence relates well to the award of credit on evidence of learning achievement. The acquisition of broader qualifications is less important to many employers than crediting new relevant competences. This is a clear strength of the approach which forms the core of ECVET.

4.2.3 Implementation of the ECVET

The European Qualifications Framework is a meta-framework to which national credit and qualification frameworks are expected to relate. This seems eminently sensible. The ECVET contains much more detail and is presented as an operational system. This raises the question as to who it is expected should use it. Our understanding is that nations are recommended to adopt it as their national system. Since ECVET operates at the full range of EQF levels this poses a question about what countries are expected to do if they have already adopted either a national system that is different or ECTS which also claims to facilitate mobility. It would appear that they may be obliged to operate the systems in parallel. This underlines our first point. Countries need practical advice. It will not make sense for them to adopt two or even three different parallel systems. Neither are they likely to abandon their comprehensive national system if that encompasses all types of learning at all levels.

Technical points:

Section 1.3 Non formal learning: we do not understand how modules can be non-formal

Section 1.4 Vocational education and training also encompasses degrees, for example in education, engineering and the health professions. VET cannot be separated from higher education as this paragraph implies.

Section 2.1 The Credit Forum notes that the term 'validate' is used to denote acceptance of credits. In the UK it generally indicates the formal approval of a programme of study leading to a qualification by an authorised body. This difference in understanding affects the comprehension of the schematic diagram.

This section [penultimate bullet] also makes reference to the transfer and accumulation of learning outcomes. We recommend that it is made quite clear that credits (not learning outcomes) may be transferred and accumulated. This is their purpose.

The inclusion of examples is very useful. We struggled however to understand the process outlined with regard to Martin. Who has awarded the credits?

Section 2.3.2 This section looks problematic. ECVET awards credits in recognition of achieved learning outcomes. This sets the foundation for the establishment of a system in which students progressively and incrementally accumulate credits for an award. This is known as the *compositional* approach and it is ideally suited for life-long learning where the learner may take on quite small elements and may not aspire to a major qualification. The employer may just want the learner to attain particular competences.

However, the schematic diagram indicates that the authorised body responsible for the qualification, subdivides the credit total and allocates the credits to units. This is known as the *impositional* approach. This is not well suited for lifelong learning because of the uncertainty as to whether the units actually warrant the credits that are being allocated to them. How can a design team visualise a fraction of a

notional full time year. There is significant risk of inequity. We recommend that ECVET [or single European System] adopts the compositional approach and encourages the design of units with credits and levels that reflect their size and difficulty which may be combined to form qualifications.

Section 2.4.3 We would not recommend the allocation of credits in respect of *parts of* units.

The EJNI Credit Forum wishes to thank the European Commission for this opportunity to comment.

Yours sincerely,

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