

# UK HE sector response

28 March 2007

## UK HE sector response to the European Commission consultation on a European Credit System for Vocational Education and Training (ECVET)

### Introduction

1. The UK higher education (HE) Europe Unit has produced this paper in consultation with the UK HE sector. The UK HE Europe Unit is a sector-wide body which aims to raise awareness of the European issues affecting UK HE and to coordinate the UK's involvement in European HE initiatives and debates. The Unit is jointly funded by Universities UK and the three HE funding councils of England (HEFCE), Wales (HEFCW), and Scotland (SFC). GuildHE and the Quality Assurance Agency (QAA) also support the Europe Unit.
2. The paper has been approved by the UK HE Europe Unit's European Coordinating Group (ECG). The officer-led European Coordinating Group comprises representatives from key HE sector organisations and informs the policy positioning of the UK HE Europe Unit.

### Introductory comments

3. The UK HE sector welcomes the aims of the proposal for the development of a Credit System for Vocational Education and Training. Increased transparency, comparability, transferability and recognition of learning in Europe are all important objectives. Particularly, if we are to enable more mobility and ensure that lifelong learning becomes a reality.

### Learning outcomes

4. The UK HE sector strongly supports the general development towards the use of learning outcomes as the primary means of describing achievement. A credit system needs to have both an approximate measure of volume and a direct link to learning outcomes, if it is to be genuinely useful as a tool to enable European citizens to pursue lifelong learning. The UK has argued for a greater emphasis on learning outcomes in the European Credit Transfer System (ECTS).

### Supporting Lifelong Learning

5. Greater use of credit and the development of ECTS into an accumulation system for the European Higher Education Area (EHEA) is one of the action lines of the Bologna Process and has been adopted by Ministers from 45 participating

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countries. The Framework for Qualifications of the EHEA adopted in 2005 includes typical ECTS credit ranges for the first and second cycles.<sup>1</sup>

6. The consultation document on ECVET makes only brief reference to ECTS and seems incompatible with ongoing efforts across Europe at national and European levels to break down the barriers between “vocational” and “academic” education. The Commission’s own Communication on ‘Delivering on the modernisation agenda for universities: education, research and innovation’<sup>2</sup> calls for greater inter-sectoral mobility in an era of lifelong learning. The European Qualifications Framework for Lifelong learning (EQF) encompasses all learning in Europe and aims to support mobility and recognition of all types of learning. The UK HE sector does not believe the current proposals will facilitate mobility or credit transfer between VET and HE, given ECTS’ focus on workload and ECVET’s focus on learning outcomes.
7. If there is to be mobility between VET and HE, it is vital that credit systems for each are compatible. The UK HE sector therefore recommends that efforts be made to bring ECTS and ECVET closer together so that they are compatible, or to create a single credit accumulation and transfer system which encompasses academic and vocationally orientated learning. The UK has two working examples of credit systems used across a number of different types of education and across lifelong learning: the Scottish Credit and Qualifications Framework (SCQF) and the Credit and Qualifications Framework for Wales (CQFW). It will be important to draw on the experience of developing these frameworks in seeking to develop ECVET and ECTS in such a way as to ensure compatibility.
8. The UK HE sector welcomes the European Commission’s recent commitment to review ECTS in 2007. This review provides an opportunity for a wide-ranging debate on the use of credit in Europe, involving stakeholders from both VET and HE. It is therefore vital that the Commission’s review process is as open and transparent as possible and involves a range of stakeholders from both the HE and VET sectors.
9. While it is vital that ECVET and ECTS are compatible, they do not have to be the same. For example, it is not a problem if ECVET has 120 credits for a year’s full-time learning, while ECTS has 60. In the context of lifelong learning, it is quite possible that ECVET would have smaller measurements of credit, allowing greater flexibility, for example. An alternative approach would be to have a fixed number of notional learning hours per credit and allow variation in the number of credits between qualifications/awards and doing away with any limit to the number of credits per year. This would allow greater transparency, consistency and honesty. Also, crucially in a lifelong learning context, if you had for example 10 notional learning hours per credit, this would provide

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<sup>1</sup> For more information on the Framework, see:

[www.bologna-bergen2005.no/Docs/00-Main\\_doc/050218\\_QF\\_EHEA.pdf](http://www.bologna-bergen2005.no/Docs/00-Main_doc/050218_QF_EHEA.pdf)

<sup>2</sup> [http://eur-lex.europa.eu/LexUriServ/site/en/com/2006/com2006\\_0208en01.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/com/2006/com2006_0208en01.pdf)

much greater flexibility (if you have more than 10 hours NLH per credit, you will exclude quite a lot of lifelong learning).

10. Any system for use across Europe (in the EU or more widely) needs to be generic enough for widespread application across many systems. Any unnecessary detail or restrictions must be avoided. The basis must be to define ECVET credits and allow individual systems/providers to determine the size of their own units and individual qualifications expressed in ECVET credits. This would also allow compatibility and enable transfer between systems using ECVET and systems using ECTS or ECTS-compatible systems.

#### **Allocation of credits**

11. In relation to section 2.3.2, the UK HE sector challenges the use of the word “importance” and references to other “variable criteria”, such as “real or notional learner effort in an informal learning context”. An emphasis on learning outcomes, skills and competences, generic and subject, is commonly agreed to be a key feature of a credit system. Unless learning outcomes and workload associated with units or modules justify additional credits, it would be inappropriate to allocate credits on deemed importance of the unit or module or on the basis of other “variable criteria”.

#### **Status of proposal**

12. The UK HE sector welcomes the voluntary status of proposals in the consultation document. Credit transfer between different types of qualification is not and cannot be made compulsory. ECTS does not of itself, or even in conjunction with the Lisbon Convention, lead to automatic recognition of learning from one HE system to another. Credit transfer still relies on other types of information in addition to ECTS points, which remain primarily a volume measure. It is the use of learning outcomes which allows different types of learning to be compared and rational and equitable decisions made on the recognition of credit for one qualification or type of learning towards a different qualification.

#### **Relationship with the proposed European Qualifications Framework for Lifelong Learning**

13. The consultation on ECVET should be seen in the context of the European Commission’s proposal for a European Qualifications Framework for Lifelong Learning. The Commission’s consultation document proposes that the implementation of ECVET will be based on the reference levels proposed within the European Qualifications Framework for Lifelong Learning (EQF). It is important to note that the European Commission proposal to establish the EQF was published in 2005 and currently passing through the EU institutions.<sup>3</sup> The Council of Ministers is not due to take a common position on the EQF until May 2007 and the Parliament not until later in the year.
14. Given that the ECVET proposal seeks to link ECVET credits directly to levels of EQF, and given the lack of direct reference of ECTS to learning outcomes, we would recommend that ECTS, if it is

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<sup>3</sup> For more information, see: [http://ec.europa.eu/education/policies/educ/eqf/index\\_en.html](http://ec.europa.eu/education/policies/educ/eqf/index_en.html). The UK HE sector position paper on the EQF can be downloaded at: [www.europeunit.ac.uk/resources/EQF%20Position%20paper%20on%20website1.pdf](http://www.europeunit.ac.uk/resources/EQF%20Position%20paper%20on%20website1.pdf).

to be used for accumulation purposes, should make reference to credit levels, by providing that ECTS credits be allocated to a level in the relevant national qualifications framework for higher education, which would also link them more generally to a cycle within the Bologna Process Framework for Qualifications of the EHEA.

### **Terminology**

15. Section 2.1 of the document uses the term 'validate' to denote acceptance of credits. In the UK, 'validate' 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 and should be addressed to avoid confusion.

### **Credit accumulation**

16. There is a strong emphasis in the consultation document on credit transfer. While the arguments supporting this emphasis are powerful, the European debate has moved to address the need for credit accumulation as well as transfer. Using credits for accumulation purposes, presents a number of challenges which institutions, member states and ECTS itself are currently addressing. Scotland and Wales are currently using credits which include both learning outcomes and a volume measure and which can be used across a range of types of learning and awards. Accumulation is completely compatible with transfer but does involve in depth consideration of levels within a qualification and attaching levels to credits.

### **Methodologies for implementation**

17. There is very little detail or guidance in the consultation document on the implementation of this proposal. This lack of detail could lead to different interpretations which would be of little value in seeking to provide clarity about qualifications or support learners/workers in their acquisition of qualifications or mobility. There is a need for the proposal to be more fine-tuned and specific.

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