

# LEARNING from EXPERIENCE TRUST

## Response to Consultation on ECVET

1 The Learning from Experience Trust is an English educational charity, based within a London University, with a 20-year record of promoting informal and work-based learning and its accreditation. We have worked with Universities, the Further Education sector in the UK, the voluntary sector and private employers in pursuit of our mission: to ensure that all learning is valued, whenever and wherever it takes place. We have a unique breadth of experience regarding learning, at all levels, and its accreditation.

2 From this vantage point, we would observe that it is an imperative that, recognising the principle of subsidiarity, there should be one single credit/qualification meta-framework within the European Union, that can be readily understood by learners, employers and institutions, as well as governments and that can recognise all forms of learning, vocational and academic, formal and informal. At present, there appear to be four. This is not helpful.

3 We reject the differentiation between academic and vocational learning, believing that all learning can be described in terms of learning outcomes and that there should be no priority afforded to one “form” of learning over another. We observe that this has been a particular, and regrettable, feature of English Higher Education. Thus we partially welcome the strapline of the document that clearly places learning outcomes at the centre of the provision.

4 But learning outcomes are provider-generated and requirements of accreditation. They need to be complemented by credits if the proposed system is to benefit learners, especially those involved in mobility. Credit recognises achievement of learning outcomes and that must be the basis of the exercise.

5 Furthermore, we assert that it is imperative that the single European Credit Framework, embracing ECVET, EHEA/Bologna, ECTS and EQF, pays due attention to the value of informal and work based learning and the role of the third sector in this.

6 We consider it imperative, within a lifelong learning context, that there be no differentiation as to levels within the purview of the meta-framework (and, indeed, within ECVET): in UK terms, there should be no differentiation, in terms of credit, between FE and HE: there should be a seamless route of progression and achievement, not least because vocational education and training embraces all levels. Any system that concentrates on mobility at the higher levels (and there is little evidence of enthusiasm for this at undergraduate levels) will discriminate against those at the lower levels, with fewer life-chances to re-locate or to be mobile. We observe that the first paragraph of 1.2 appears to recognise this. We think this should be made explicit.

7 Thus our responses to the specific questions are

4.2.1 imperative that an ECVET system articulates with (or is subsumed within) a comprehensive European Credit Framework that will value all forms of learning equally

- 4.2.2 we observe with some interest the notion of 120 credit points. Having regard to the UK system (not, of course, time-bound), 120 equates to the length of an undergraduate year: a post graduate year, which extends over a calendar year, achieves 180 credit points. We think there needs to be some clarification here and the technicalities re-thought, not least about the place of learning outcomes and how these might be articulated
- 4.2.3 we would repeat our comments about the necessity for a comprehensive, in every sense (level, type of learning, formality (or not) and we would be happy to bring our expertise to the development of an ECVET framework within this context, notably in the area of learning outcomes
- 4.2.4 Some headline responses on supporting the development and dissemination (there are, no doubt, many others):
- institutional and national champions should be identified
- templates of the documents referred to in 2.4.1 should be developed
- awarding bodies, of whatever type, should be identified and developed, eg with appropriate professional development being provided, publicised and disseminated so that the programme can be “cascaded”
- 4.2.5 we remain somewhat sceptical about current mobility at the lower levels (specific initiatives apart, eg trade union officials’ exchanges), so ECVET, if successful, could make a real contribution to mobility. At the higher levels, staff development, eg in the shape of information exchanges and study tours will be important.

Aside from the specific questions in the consultation, we would wish to associate ourselves with the comments by the England Wales and Northern Ireland Credit Forum in that body’s observations on para 2.3.2 of the document. If the end-product desired is lifelong learning, the emphasis must be on compositional credit rather than impositional credit. The latter approach will be self-defeating in terms of the aims sought by the consultation.

Further, as suggested above, in terms of implementation (2.4) we consider it important that the “coulds” in the sub-section be replaced by “shoulds”: such templates will be essential to the success of the endeavour.

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