

Royal College of Nursing response to the European Commission consultation regarding a European Credit System for Vocational Education and Training (ECVET)

With a membership of over 390,000 registered nurses, midwives, health visitors, nursing students, health care support workers and cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and European political institutions, trade unions, professional bodies and voluntary organisations.

General Remarks

The RCN commends the European Commission on this vision to enable transferability of learning and qualifications across the EU, and broadly supports the principles laid out in the Consultation paper.

The RCN wishes to point out that even within the UK, qualifications and credit are not often recognised as being of equal value, e.g. through the CATS system in Higher Education Institutions, and that there lacks a single academic language leading to varying and confusing terminology. At the outset it would be vitally important for the ECVET system to address these two issues.

As a final point the RCN recognises the value the ECVET system may have in enabling highly qualified professionals to find employment in posts they are qualified for, across the EU. This would prevent the waste of valuable resources, including the costs incurred by EU countries in training individuals.

Questions

4.2.1 The purpose of and reasons for an ECVET system

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? If not, what is missing?

How higher education institutions can collaborate together is not addressed in the consultation document. In addition, any candidates wishing to develop their careers in another EU country should be able to do so, and find their qualifications recognised with equal value across the EU at all academic levels.

The Commission also needs to consider introducing one system to deal with vocational educational training and higher education institutions, so that students passing between the two have as smooth a transition as possible.

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

The ECVET system has the potential to revolutionise vocational education and training. The main added value would be:

- Equal recognition of skills, across the EU
- Support for life-long learning
- A tool to assess learning outcomes acquired abroad, which would allow different competent bodies to validate and recognise them
- Personal and professional development of the workforce leading to a better educated and skilled EU population.

4.2.2. The technical basis for ECVET

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?

The RCN would welcome greater discussion around the issue of accreditation of professionals in accordance with their training and skills obtained. One example is that RCN accreditation acts as quality assurance for employers that an individual has achieved specific learning outcomes. It is primarily concerned with skills and competencies, but recognises an appropriate knowledge base. In addition some training accredited by the RCN will have assessment procedures built in. The RCN also occasionally accredits courses which have been undertaken overseas or accessed internationally (e.g. distance learning courses).

RCN member Forums develop specific competencies, which are then ratified by RCN Accreditation. The Accreditation Unit aims to ensure consistency between nurses' current and future competencies, and to support nurses to develop 'spheres of competencies' at different levels of expertise and specialisation.

In light of the above, the RCN would welcome a system of EU wide system of recognition of qualifications. However there needs to be greater clarity about the relationship between 'competent bodies' and already existing Accreditation Units. Could the RCN for example become a 'competent body'?

Do ECVET's technical specifications take sufficient account of the evaluation, validation, recognition, accumulation, transfer of learning outcomes whether formal, non-formal or informal?

The technical specifications do not refer to assessment of theory and practice in enough detail. These are left to be considered within memoranda of understanding between partnerships. The Commission may wish to consider with European stakeholders, how evaluation of learning outcomes can be assessed.

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 would you suggest?

The RCN supports a reference figure of 120 credits. However the European Commission must ensure that criteria for allocating credit points are fair, transparent and as simple as possible. In the UK credit points are allocated according to hours of study, under the CATS system. This is calculated by the teacher/academic who writes

the learning outcomes. The system is widely used, and works well in both theoretical and practical assessment in higher education and professional education.

The RCN has some concern that the Consultation is mainly concerned with vocational training for young people, or those with no previous qualifications. More consideration should be given to those already holding professional qualifications, who wish to continue their professional development. The European Commission must ensure that the credits system does not prevent individuals from engaging in lifelong learning and moving from one work context to another just because they do not have the requisite number of credits. That the individual can show themselves to possess the required learning outcomes, based on their knowledge and competence, should take precedent.

4.2.3. Implementing ECVET

Are there any features in your qualifications system which would favour the introduction of ECVET? What constraints, if any, do you foresee?

The RCN, in its own educational provision, actively encourages flexible, modular, and unit-based qualifications with diverse entry levels and training pathways. We have been offering flexible, distance learning opportunities at a variety of levels for over a decade, many of which have been accessed by students from a range of European countries. The European Commission could draw upon the experience of the RCN to integrate flexibility and unit-based approaches into the ECVET system.

Existing constraints would occur where there is no single academic language for qualifications and learning outcomes. In the UK the current scottish/national vocational qualifications system constantly has to be revised due to unnecessary complexity of language and functions. In this respect the ECVET system could facilitate a new generic language of education, which would be applicable and understood across the EU.

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

Although the RCN believes that a five year timeframe would be achievable if funding were made available to set up and implement the system, and there were firm commitment from the European Commission and Member State governments, it consider a 10 year timeframe to be more realistic. The RCN position would support a tendering process to oversee the development and implementation of the system. It would not support Member State appointed Quangos that were established to carry out this role.

*4.2.4. Measures for supporting the implementation and development of ECVET
What kind of measures should be taken at European, national and sectoral levels to facilitate the implementation of ECVET?*

The RCN encourages the European Commission to develop a Memorandum of Understanding, or some such formal directive to enhance the voluntary commitment of EU countries to the ECVET system. Without commitment from Member State

governments, the system would lack essential political support. On a sectoral level the successful implementation of the system depends on the commitment of employers, regulatory bodies, professional bodies, and 'competent authorities'. The RCN also urges the Commission to involve student bodies as a major stakeholder in the consultation process.

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

The RCN advises the European Commission to explore the possibility of an EU skills passport / licence / portfolio, which can be readily understood by employers and educational establishments anywhere in the EU. This should be accompanied by easily obtainable guidance to the ECVET system, via the Internet, Educational establishments, EU publications etc.

Furthermore, to support the implementation of ECVET, the RCN advocates European and national investment to develop bridges and pathways between vocational and academic qualifications.

4.2.5. ECVET's potential for enhancing mobility

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

ECVET, if successful, has the potential to transform vocational education across Europe. It would enhance collaboration and cooperation between EU countries.

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

The ECVET system could enhance the current Leonardo da Vinci and Erasmus programmes through enabling individuals to identify ways of using their skills and qualifications within these programmes. Sharing common goals towards developing a skilled and educated workforce, who have skills for life, is a commendable aim of the proposal.

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