

European Commission consultation on proposals for a European Credit System for Vocational Education and Training (ECVET)

Response to the consultation from the Scottish Advisory Committee on Credit and Access

March 2007

General response

The Scottish Advisory Committee on Credit and Access (SACCA), acting on behalf of the Quality Assurance Agency for Higher Education Scotland (QAA Scotland), Universities Scotland and the Scottish higher education sector broadly welcomes the proposed introduction of a European Credit System for Vocational Education and Training (ECVET).

However, SACCA is keen to see developments in VET and ECVET in particular dovetail with ongoing developments in the Bologna Process (moving towards the European Higher Education Area [EHEA]) and with the European Credit Transfer System (ECTS). While it is understood that ECVET will look for its main reference point to the proposed European Qualifications Framework for Lifelong learning (EQF), the Scottish higher education sector looks to the European Higher Education Area as its first point of reference and has underlined that commitment by planning a national conference on the implications of the EHEA for Scotland later in 2007.

SACCA strongly believes that there should be compatibility between ECTS and ECVET, in so far as the proposals for ECVET should build on or relate to ECTS as the extant credit system in use across Europe. There is no mileage to be gained in seeking to develop a credit system which diverges from current practice.

It is understood that the European Commission will review ECTS in 2007, and SACCA is in favour of an approach being taken to place a greater emphasis on/detail a clearer link to learning outcomes in the development of ECTS. This will accord with developments in moving towards the establishment of the EHEA, such as the alignment of national frameworks with the overarching EHEA framework (Scotland and the Republic of Ireland recently became the first two of 45 countries signed up to the Bologna process to verify such alignment).

In sum, SACCA recognizes the importance of ECVET developing in a way which is useful primarily to vocational education training, but believes that developments in ECVET should recognize and take account of existing tools and instruments including the EHEA, ECTS, Diploma and Certificate supplements.

Finally, SACCA welcomes the fact that ECVET continues to have a non-regulatory mission, with its proposed introduction being based on voluntary participation.

Specific detail

The proposal that ECVET carries 120 credits for a year's formal full time vocational education and training is not incompatible with an ECTS full time year of 60 credits. The

Commission has accepted that in Scotland (and elsewhere in the UK) 120 Scottish Credit and Qualifications Framework (SCQF) credit points equals a year's full time undergraduate study, and is equivalent to an ECTS year of 60 credits. Similarly, there is no indication that the Scottish system needs to change to 60 credits to comply with the Bologna process.

The SCQF is a working example of a credit system for lifelong learning, and, while SACCA does not suggest the SCQF should be adopted by other countries, SACCA is confident that the Partnership taking forward the ongoing development of the SCQF would be happy to engage with other countries to exchange ideas.

SACCA would highlight two further specific points on ECVET credit. The first relates to the statement in the consultation document that 'ECVET credit points should be allocated on the basis of criteria such as...an estimation of the importance of the contents of each unit defined in terms of knowledge, skills and competence'. Such a method of allocation would tend to mitigate against effective credit transfer arrangements, both within ECVET and between ECVET and higher education.

Secondly, SACCA seeks clarification on the proposed method of allocating ECVET credit points. The proposal is that ECVET credit will be allocated first to a whole qualification, with points from that total then allocated to units as appropriate. However, this proposed methodology begs the question of what happens when the same unit is common to two qualifications of different size. Should not the allocation of credit begin with the unit and move up to the qualification to avoid potential anomalies?

SACCA, while acknowledging the utility of the *Council conclusions on quality assurance in vocational education and training* nonetheless highlights the need to be confident that robust quality assurance procedures governing 'competent bodies' (those bodies across Europe empowered to allocate ECVET credit) are in place and are monitored and reviewed as appropriate.

Conclusion

SACCA looks forward to the publication and discussion of the results of the ECVET consultation process at the conference to be convened for that purpose in June 2007. SACCA further looks forward to the chance to continue to engage with the European Commission as the proposals for ECVET develop.