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Sent: 20 March 2007 18:53
To: EAC-A3-ECVET@ec.europa.eu
Cc: vice-chancellor@soton.ac.uk; C.A.Thomas@soton.ac.uk
Subject: European Commission Consultation, ECVET

Dear Colleagues,

Thank you for your invitation to take part in the consultation process on this important initiative. I have discussed the proposals in the Commission Staff Working Document with interested colleagues, including the Vice-Chancellor and Deputy Vice-Chancellor (Education) at the University of Southampton and recognise the work and thought that has gone into the document.

However we do have some serious concerns with the proposals that have been developed thus far. We note that, surprisingly, there appears to be no common reference point for Europe, and that what is being proposed is not consistent with [existing recommendations for the implementation of Bologna](#). It would appear that the EHEA will have two 'credit' systems that do not "speak" to one another. [This will disadvantage the individuals concerned and confuse employers on the one hand and university admissions tutors on the other](#). How, for example, will universities be able make judgments about what has been achieved either for admission to programmes or for exemptions [from learning](#)?

In addition we are not clear how what is being proposed will relate to [the role of the NARIC in each country](#). The emphasis on time spent [for 75 credits for a year](#) once again conflicts with our preference in the UK for judgments based on learning outcomes achieved, and, sadly, it does not tie up with NVQ and GNVQ in this country which is tried and tested. In other words there are no escalators in the model proposed other than those in the European Quality Framework and there will be no transferability outside partner institutions. Such an arrangement on the face of it looks discriminatory. [Furthermore there is an assumption that 'time spent' equals 'learning achieved' and this, in our view, needs to be questioned not least in the context of competence development](#).

Our preference would be for only one form of educational credit and not what we believe is a false distinction between vocational and other forms of credit. In addition the apparent presumption that there can be no transfer from vocational to other forms of higher education surely needs to be questioned and seems contrary to a 21st century view of education. As we understand the document, the definition of "competence" is not applied consistently with other definitions already prevalent in Europe since the definition applied here appears to separate knowledge and skill.

We think that the system adopted should be aligned with ECTS with regard to credit hours per value per degree of difficulty. What is being proposed here fails to take account of depth or breadth of learning, and the language of learning outcomes is missing. Moreover the lack of international comparisons to international occupational standards in legislative areas (e.g. construction, health, use of chemicals, health and safety, food hygiene) is a real cause for concern.

Perhaps most importantly of all it seems to us that the potential of this system for enhancing mobility will be severely limited and limiting, [and could undermine rather than build the ethos of the Lisbon agenda](#).

[My colleagues and I would be happy to discuss these issues further if that would be helpful](#).

Yours sincerely,
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