

# **UK RESPONSE TO A PROPOSED EUROPEAN CREDIT SYSTEM FOR VOCATIONAL EDUCATION AND TRAINING**

## **Introduction**

The Department for Education and Skills in the United Kingdom launched a UK wide consultation on the Commission Staff Working Document on the European Credit System for Vocational Education and Training (ECVET) on 12 December 2006. 173 stakeholders were invited to respond to the consultation directly, including from the devolved administrations in Scotland, Wales and Northern Ireland. The consultation invited interested parties to comment on the questions raised in the Commission's document, and also invited respondents to comment on any other issues surrounding the proposal.

The responses received were from a wide range of organizations across each of the administrations of the UK. They included competent authorities, whose occupations are covered by the provisions of the mutual recognition Directives, awarding and examination bodies, employers and employer organizations, trade unions, and higher education institutions.

This response reflects the views of the UK Government, taking account of the comments received.

## **Summary**

The UK welcomes the Commission's proposal for a European Credit System for Vocational Education and Training. Increased transparency, comparability, transferability and recognition of competence and qualifications are all important if we are to enable greater mobility and ensure that lifelong learning becomes a reality. If developed carefully, ECVET has the potential to aid us in meeting these objectives. In particular, the UK strongly supports the emphasis on learning outcomes as the primary means of describing achievement. This should help move towards a system where individuals are recognised for what they achieve, rather than how long they have studied.

However, we believe that there are a number of issues that need to be addressed as ECVET develops further.

- The UK questions the need for separate credit systems for higher education (ECTS) and vocational education and training (ECVET). We recommend that the Commission evaluates the two systems and examines how the two can be brought closer together to provide a single system for lifelong learning.
- The basis for allocating credit needs to be defined more clearly for all participating Member States if ECVET is to operate outside specific bilateral arrangements. The UK recommends that the Commission examines this issue in more detail.

- The process for allocating credit should be based on an incremental, bottom-up approach, where units can stand apart from qualifications. The UK recommends that the proposals are revised to reflect this.
- Proposals around quality assurance mechanisms will need to be clarified and strengthened. The UK recommends that this is made more explicit.
- As the ECVET proposals develop, efforts should be made to support countries who have not yet adopted a learning outcomes and unit-based approach to their vocational qualifications. The UK recommends that the Commission examines ways to achieve this.

## **Response to specific consultation questions**

### The purpose and reasons for an ECVET system

1. *Are the most important objectives and functions of a European system of credits for vocational education and training and the role of competent authorities fully outlined in the consultation document? If not, what is missing?*

The UK supports the objectives of the proposed ECVET system, as set out in the consultation document. Increased transparency, comparability, transferability and recognition of competence and qualifications are all important if we are to enable greater mobility and ensure that lifelong learning becomes a reality. If developed carefully, ECVET has the potential to aid us in meeting these objectives. In particular, the UK strongly supports the emphasis on learning outcomes as the primary means of describing achievement. This is consistent with the development of vocational qualification systems across the UK, and should help move towards a system where individuals are recognised for what they achieve, rather than how long they have studied.

However, the UK is concerned about the potential problems arising from having separate credit systems for higher education (ECTS) and vocational education and training (ECVET). We suggest that there is a need to break down the artificial barriers between ‘vocational’ and ‘academic’ education, and the adoption of two different credit systems – one for vocational education, and one for academic – is not helpful in this respect. We believe that the ECVET proposals may not facilitate the mobility or credit transfer between VET and HE, given ECTS’s focus on workload, and ECVET’s focus on learning outcomes. Moreover, the presence of two credit systems has the potential to confuse stakeholders. The UK therefore recommends that the Commission evaluates the two systems and examines ways to bring ECTS and ECVET closer together so that they are compatible, or to create a single credit accumulation and transfer system which encompasses both academic and vocationally-orientated learning. This could be done through public consultation on ECTS and how it should develop in relation to ECVET.

Many respondents suggested that the definition of a competent body should be clarified and strengthened. We would welcome more detail on the proposed roles and responsibilities of competent bodies, and where these might be subject to regulatory differentiation.

Some stakeholders have also expressed concern about how ECVET will work in practice. While the proposed European Qualifications Framework (EQF) is intended as a meta-framework to which national systems can relate, ECVET is presented as an operational framework that nations are recommended to adopt as their national systems. Given that there are some countries with national systems already in place, ECVET should follow the same principle as EQF in acting as a reference tool.

## *2. What would be the main added value of the ECVET system?*

If successful, the main added value of this system would be the facilitation of credit accumulation and transfer, thus enabling learners to have their learning outcomes recognised abroad. This would help to support transnational mobility for individuals, but also would aid the development of institutional and sectoral partnerships across Europe. ECVET therefore has the potential to support the internal market, and to address specific skills gaps within certain organizations and sectors. It could also help individuals to achieve personal fulfilment by allowing them to work and study more easily in different Member States. This could be particularly attractive to currently disengaged learners, who may be encouraged to update their existing skills.

However, for this added value to be realised, there will have to be consensus around aspects of the technical specifications and operational criteria of the system. The process of allocating credit, the specification for certain ECVET components (e.g. a unit), and the relationship between ECVET and national credit systems need particular clarification. In its current form, the proposal lends itself well to the context of bilateral exchanges, but cannot be generalised for a *European* system unless a common approach is agreed.

In addition, clear communication of the purpose, objectives and workings of ECVET will be essential in order to build support amongst stakeholders, many of whom are not convinced that the proposal is implementable in its present form.

## The technical basis for ECVET

### *3. 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 UK believes that certain technical specifications do need to be set out in greater detail if ECVET is to be widely accepted and implemented. In general terms the UK advises that, in order for a European credit system for VET to work, the basis for allocating credit needs to be clearly defined for all participating Member States. This could serve as a 'converter' for those Member States with national credit systems, or as a basis for developing

national credit systems. In this way it would complement the EQF, which serves as a translation device to which Member States relate through their national qualifications frameworks or systems.

The UK also has more specific technical concerns. We are concerned about the process of allocating credit, as set out in section 2.3.2 of the consultation document. Here, the document suggests a process of allocating credit to a *qualification* first, which is then subdivided into *units*. This 'top-down' process does not facilitate credit accumulation and transfer, as there is no real understanding of the size or demand of that unit and so no confidence in the credit values assigned. To ensure a flexible system, where learners can take small elements of learning to suit their needs, a more incremental, 'bottom-up' approach is advocated. Units should therefore be independent entities and capable of being individually assessed. They should be designed with credits and levels that reflect their size and difficulty. Units may then be combined (following certain rules) to form qualifications.

The UK also suggests that proposals around quality assurance procedures will need to be strengthened. Transparent and rigorous quality assurance principles and practice will be crucial to the success of ECVET, and the requirements for these should be clearly communicated in any subsequent proposal. Mutual confidence in the processes of recognizing competent bodies, assigning credit values, and ensuring that units remain up-to-date must be assured and maintained.

We also believe that certain definitions need to be clarified in order to minimize the potential for confusion. For example, in the consultation document, the term 'validate' is used to denote the acceptance of credits. In the UK, however, 'validate' generally indicates the formal approval of a programme of study leading to a qualification by an authorised body.

4. *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 UK understands that the detail of this will be largely left to the Memoranda of Understanding or bilateral arrangements suggested for adoption. As no common methodology for allocating ECVET credit has been proposed, credit will not generally be transferable outside these bilateral arrangements.

It is important to note that it is *credits* and not learning outcomes that may be transferred and accumulated. If credit transfer is to work on a consistent and stable basis, it is necessary that a common understanding of how to define credit values is defined and advocated. The UK also advises the credits can only be awarded on the basis of the successful completion of a full unit, and

not in respect of *parts of units* as the proposal suggests.

Several respondents were also unclear as to how rigorously ECVET could be applied to non-formal and informal learning, and requested more detail about how individuals could evidence these. Moreover, careful consideration will have to be made at both national and European levels of the role that the accreditation of prior learning would play in an ECVET system. This issue is currently being discussed in England in the context of developing a Qualifications and Credit Framework (QCF) and is a part of the ongoing work in the Credit and Qualifications Framework for Wales (CQFW).

*5. 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 coherence of the system at European level? If not, what do you suggest?*

The yardstick of 120 credit points may be useful, but is insufficient to guarantee a common approach to allocating credit in the context of European mobility. Unless there is a common European basis for allocating credit, the coherence of the system at European level cannot be ensured. Bilateral agreements may be formed, as suggested in the proposal, which will result in recognition and transfer between certain institutions, but the goal of supporting mobility across Europe is unlikely to be achieved by this method.

#### Implementing ECVET

*6. Under what conditions could describing qualifications in terms of learning outcomes and expressing them in units effectively improve the transparency of qualifications and contribute to the development of mutual trust?*

Qualifications expressed in learning outcomes clearly define to the learner, the employer, and the receiving institution what the learner is expected to achieve in order to gain a unit or qualification. However, in order to provide effective transparency of learning, a learning outcomes approach needs to be underpinned by rigorous common quality assurance principles, which will lend credibility to the assessment of these learning outcomes. It is not the case that ECVET needs to add unnecessary layers and procedures for quality, as this would add bureaucracy and jeopardize its chances of success. However, there must be clear minimum requirements for quality that Member States can demonstrate they meet. In this way, transparency can develop into mutual trust, and will encourage widespread consultation and sharing of good practice.

*7. Which criteria or combinations of criteria for allocating credit points could be selected and used?*

If the benefits of an ECVET system are to be maximized, there needs to be a set of underlying principles for allocating credit values that is capable of being applied across the lifelong learning spectrum. These should be as minimal as

possible, in order to minimize the potential for a clash with other Member States' systems, but clear. Within many national and international frameworks, the allocation of credit is based upon notional learning time (i.e. the time it would take the typical learner to achieve the learning outcome). The UK would recommend that credit is allocated on this basis, and that a small building block is used in order to guarantee maximum flexibility. A system where one credit point represents a notional 10 hours of learning would therefore seem the most effective and flexible way of allocating credit.

In section 2.3.2 of the consultation document, it is suggested that part of the basis for allocating credit points could be "an estimation of the importance of the contents of each unit defined in terms of knowledge, skills and competence". We are not clear what is meant by "importance" in relation to content. We would suggest that, unless the learning outcomes associated with units justify additional credits, it would be inappropriate to allocate credits on the deemed "importance" of the unit.

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

There has been a move across the UK in recent years towards a unit-based, learning outcomes approach to vocational qualifications, and this will complement the proposed ECVET system. Moreover, the UK is developing and trialling a new credit-based qualifications system called the Qualifications and Credit Framework (QCF), which will supplement this process of qualifications reform. Within the QCF, units provide the building blocks of the system and are comprised of learning outcomes and associated assessment criteria, along with the unit level and credit value. This corresponds well to the ECVET proposals. There is also systematic quality assurance of vocational qualifications in the UK, including through regulatory bodies and the commitment of awarding bodies to certain quality standards. This should provide a sound foundation for the introduction of ECVET if it can work with these systems.

The UK does, however, have certain concerns. As mentioned previously, we hold reservations over the lack of a basis for allocating credit. Many stakeholders were also unclear about how ECVET would be able to overcome the variation in standards that exists across Europe, particularly in Health and Safety. Finally, concerns were also voiced that the cost of the initiative may not be worth the added value. It will therefore be crucial to develop a system that will benefit learners and employers significantly, and to communicate these benefits to them.

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

If the issues surrounding the basis for allocating credit can be resolved, and if this basis can be related to the systems developed in the UK, then the ECVET system could be implemented in the UK without a great deal of technical difficulty. With these issues still unresolved, however, it is difficult to put a

timeframe on implementation. Moreover, the development of the European Qualifications Framework (EQF) is not scheduled for completion before 2010, and it would seem unwise to take measures towards the implementation of ECVET before the EQF is operational.

### Measures for supporting the implementation and development of ECVET

#### *10. What kind of measures should be taken at European, national and sectoral levels to facilitate the implementation of ECVET?*

Agreement over the outstanding technical issues will be an essential first step towards the implementation of ECVET. It will also be important to remain in close consultation with all relevant stakeholders as the proposals are developed further. If ECVET is to succeed, it will require the active support of employers and learners.

Member states that have not yet developed a learning outcomes, credit and unit-based system would benefit from significant support at European and national levels. We would suggest that experience of this type of reform be shared and disseminated, including through study visits and the development of case studies.

Once the details of an ECVET system are agreed, UK stakeholders suggested it would require a trial period, concentrating initially on selected qualifications or sectors.

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

Most respondents believed that guidance should be developed at Member State level, within a framework and parameters agreed at European level, as different countries would require different levels of support. Stakeholders generally agreed that a reference guide to agreed definitions would be useful and that realistic case studies and model Memoranda of Understanding and unit specifications should be provided in order to aid implementation. In time, user-friendly documentation for learners and employers would also need to be developed in order to make the system accessible to all Europeans.

### ECVET's potential for enhancing mobility

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

If an ECVET system works smoothly and brings benefits to the bodies involved, the potential for fostering transnational partnerships between institutions would be increased. ECVET may increase mutual confidence in, and the quality of, qualifications systems across Europe, and the UK would encourage efforts to exchange best practice in these areas.

However, if ECVET is overly bureaucratic and difficult for learners to use, it

could act as a potential barrier to mobility and the formation of transnational partnerships. Some stakeholders expressed the view that the absence of ECVET was not a significant barrier to mobility at the present time. It will therefore be crucial to ensure that ECVET adds significant value in the field of European mobility, and to demonstrate this added value to stakeholders.

*13. To what extent and how will ECVET improve the quality of Community programmes on mobility and participation in these programmes?*

A learning outcomes, unit-based system has the flexibility to recognise the short instances of learning most likely to occur in these circumstances. If ECVET helps European stakeholders to adopt these principles, the transfer of learning from one context and sector to another would be facilitated and encouraged. This has the potential to lead to increased participation, but the possible benefits of ECVET would have to be realised and demonstrated to end-users first. It is also important to recognise the ECVET is only one part of the equation. The motives and barriers to participation are complex, including language and cultural barriers, and these cannot be solved simply by the adoption of ECVET.

*14. To what extent and how do you think that ECVET and Europass could complement each other to enhance mobility?*

An ECVET system would quantify the learning described by the Europass portfolio, and in this way they could be mutually reinforcing. This would be particularly appropriate for the European Certificate Supplement and would enhance the possibility of assessing and certifying an overseas placement on the *Europass Mobility*. However, there is a need to guard against potential overlap between the ECVET learning agreement and existing Europass documents (such as the Europass Mobility).