



Universities UK

Proposals for national arrangements for the use of academic credit in higher education in England

Final report of the Burgess Group





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Chair's foreword

Strong and reasoned arguments in favour of a national credit framework for England date back at least 20 years. Most recently, in 2004, the Measuring and Recording Student Achievement Scoping Group — which I chaired — concluded that a concerted effort should be made to achieve a more consistent and widespread use of credit in higher education.

A Steering Group was established in 2005 to take this work forward, as one strand among several others concerned with the practicalities of enhancing systems for measuring and recording student achievement. We were fortunate in this task, and freely acknowledge that a great deal of progress had already been made in the development of credit systems by higher education institutions, alone and in consortia. A lot of good work was already ongoing in England and beyond, providing us with a wealth of experience and practice to draw upon. We quickly realised that what we needed was a single overarching framework, which could bring coherence to existing activities in England as well as codifying practice and providing advice for those yet to undertake major credit developments. Our task has therefore largely been one of providing leadership and charting a clear pathway for use by universities and colleges as they find appropriate to their circumstances.

To achieve this we supplemented our consideration of existing literature with commissioned background papers and small-scale research studies. Most important of all we engaged in debate with the sector and other stakeholders through a structured and thorough programme of consultation. A key message from those extensive discussions was that we should aim for a system which optimised the benefits for students whilst ensuring that the processes were as smooth and as simple as possible to operate and understand. This has led us to develop a permissive credit framework, one which is respectful of institutional autonomy and integrated with the existing Framework for Higher Education Qualifications (FHEQ).

Although we hope that all institutions will wish to participate in time, we appreciate that some may not. Our evidence suggests that most will find a national approach useful and we believe that arguments in favour of a national English credit framework of the kind we are proposing are persuasive, and that the time is right to implement it.



Professor Robert Burgess

Vice-Chancellor, University of Leicester

Chair, Measuring and Recording Student Achievement Steering Group

November 2006

Executive summary

Introduction

'Credit' has an increasingly important role to play in recording student achievement and also for providing support for students and their progression both into and within the education system. It is a key tool for promoting lifelong learning.

Credit can serve a number of purposes but is fundamentally a tool for assessing the equivalence of learning achieved by an individual. Credit is usually defined by a specific number of credit points, representing how much learning an individual has done to achieve a qualification. The level at which credit points are awarded is also important.

Credit points and level or qualification descriptors are often part of, or linked to, local, regional or national frameworks. A credit framework is a means of setting down the recommended overall credit requirements for specific qualifications. Framework or level descriptors outline the general outcomes of learning expected at a given level.

Background

In 2004, the first Burgess Report – the Report of the Measuring and Recording Student Achievement Scoping Group – called for the adoption of a common higher education credit system/framework in England, Wales and Northern Ireland. A Measuring and Recording Student Achievement Steering Group was established in February 2005 to consider and consult on practical proposals for the implementation of the Scoping Group's recommendations. This report contains the proposals which are the outcome of those deliberations.

Proposals

The Steering Group's extensive consultation exercises revealed overwhelming support for a permissive national credit framework, rather than a more prescriptive credit system, from the sector and other stakeholders, supported by the issuing of national guidelines on credit. The proposals are made in the context that:

- Institutions' decision-making processes regarding academic standards and quality should and will remain properly and entirely the responsibility of each autonomous institution.
- The application of any national guidelines on credit will remain a matter for individual institutions to decide upon at their discretion.

- Whilst all learning may be expressed in terms of credit values, not all credit can or will necessarily be accumulated towards a specific programme or award. Each higher education institution (HEI) will determine what credit it will accept for purposes of accumulation or transfer.

The Steering Group proposes that:

- Credit arrangements for higher education in England should be developed at a national level by the start of academic year 2008/09.
- The fine operational detail of these national credit arrangements should be developed by a credit issues development group (CIDG) on behalf of the English higher education sector.
- By the start of academic year 2009/10 English higher education institutions should have credit-rated their main provision and thereafter should start to include the credit value in a published description of each of the programmes they offer.
- National credit arrangements for higher education in England should be structured as a framework that is linked to the Framework for Higher Education Qualifications (FHEQ).
- Guidance should be drawn up by the CIDG. This should be broad, overarching and advisory, allowing institutions to adopt and adapt elements as appropriate to their needs and circumstances. The guidance should indicate:
 - the total credit value normally associated with the main higher education awards in England. For example, a normal full-time year of undergraduate study should be represented by 120 credits, and a full-time postgraduate year by 180 credits; and
 - expectations about the minimum number of credits, within the overall total, normally associated with the level of the award.
- The UK Higher Education Europe Unit (Europe Unit), should lead in continuing to monitor and inform about European Credit Transfer System (ECTS) credit developments, with the purpose of providing clear guidance on articulation between ECTS and the UK credit systems to the credit issues development group.
- The national credit arrangements should be owned by the English higher education sector and maintained by QAA on its behalf.

Part 1: Introduction

- 1 Coherent, integrated curricula, leading to named qualifications are important and defining features of higher education. However, it is widely acknowledged that 'credit' has an increasingly important role to play in recording student achievement and also for providing support for students and their progression both into and within the education system. It is therefore a key tool for promoting lifelong learning. In 2004, the first Burgess Report – the Report of the Measuring and Recording Student Achievement Scoping Group - highlighted these benefits and called for the adoption of a common higher education credit system in England, Wales and Northern Ireland, stating that, "a concerted effort should be made to achieve more consistent and widespread use of credit in higher education".¹ The report acknowledged that "to achieve a common understanding in developing credit proposals, credit terminology, the relationship between credit systems and qualifications frameworks, and their respective functions and parameters, should be defined and agreed".² It recommended that these should be defined and agreed and taken forward by the sector and its partners.

Background

- 2 The original Measuring and Recording Student Achievement Scoping Group (the Scoping Group), was established by Universities UK and the Standing Conference of Principals, with support from the Higher Education Funding Council for England, in October 2003. Its remit was to review the recommendations of the UK Government White Paper, *The Future of Higher Education* specifically relating to measuring and recording student achievement. The Scoping Group reported in November 2004 with a number of recommendations for future action. Those relating to credit are at Annex A.
- 3 A Measuring and Recording Student Achievement Steering Group (the Steering Group) was established in February 2005 to consider and consult on practical proposals for the implementation of the Scoping Group's recommendations. The Steering Group comprises some of the members of the original Scoping Group and a number of new members drawn from a range of institutions across the sector. As the Scoping Group also recommended, membership also now includes representatives of institutions and representative bodies from all UK countries, in acknowledgement of the likely scope and impact of future changes.
- 4 This is the first report of the Steering Group. Further work on assessment issues, the Diploma Supplement and Transcript and potential adjustments to the honours degree classification system is ongoing, with a report due to be issued in early 2007.
- 5 The full terms of reference and membership of the Steering Group are at Annex B.

Methodology

- 6 The Steering Group has met 14 times since it was established. The original Scoping Group had developed and followed a set of principles to guide its activities. At its first meeting the Steering Group endorsed these principles and resolved that they would also underpin its work, augmented by some additional principles. The principles are:
- to respect institutional autonomy and academic professionalism;
 - to ensure that the interests of students are a primary concern of all aspects in the work of the Group;
 - to ensure that proposals are, as far as possible, “owned” by the sector via effective communication and consultation;
 - not to shy away from suggesting radical change if this is the consensus of the Group;
 - not to shy away from suggesting change which has general support, even if a significant minority of institutions are opposed to it;
 - to ensure clarity about the problems we are trying to address/opportunities we are trying to exploit or create;
 - to ensure that proposals are, as far as possible, evidence-based through reviewing previous work as well as commissioning further research and highlighting examples of good practice;
 - at all times to be concerned about the possible burden of recommendations on institutions and staff;
 - proposals should, where possible, go with the grain of existing developments; and
 - proposals must be seen to be useful by the sector and make reference to practical examples to show they are workable.
- 7 At that first meeting the Steering Group also officially received the report of the Scoping Group and gave consideration to its recommendations. Credit was highlighted as one of the main themes for further work.

- 8 Our work on credit has not started from a blank sheet. There was much upon which to build, both in terms of practical activity and research. We have drawn heavily on the work of the original Scoping Group's Credit Sub-Group and also on a survey published by the England, Wales and Northern Ireland Credit Forum (the Johnson Report).³ The latter recorded that in England there is a wealth of experience in the application of credit in higher education and, even in the absence of national arrangements, a range of higher education credit schemes have been established and are working well. There are also well-established national schemes operating in the other UK countries, and international schemes such as the European Credit Transfer System (ECTS). We thought it particularly important to be alert to the unfolding ECTS developments and a detailed briefing note on the background to these issues, to date, is at Annex D. Beyond Europe, there has also been a movement towards, and adoption of, credit schemes. In addition the Qualifications and Curriculum Authority (QCA) has been developing a *Framework for Achievement* for the school and further education sectors. We took account of all of these developments during our deliberations.
- 9 We commissioned a series of papers from the Quality Assurance Agency for Higher Education (QAA) to inform our discussions and supplemented this material with discussions with internal and external groups and organisations with an interest in credit developments both in the UK and more widely in Europe. These activities helped us to form our views on the issues for formal presentation to the higher education sector and other stakeholders, with which we consulted extensively. We carried out two full written consultation exercises in two stages – one in autumn 2005 and one in spring 2006. We also held two consultation conferences to explain, discuss and debate our emerging conclusions with a wide range of sector officers with an interest in these issues as well as other stakeholder groups. In addition, the Chair met separately with Pro-Vice-Chancellors for learning and teaching and also with student records officers. We have taken care to reflect advice and suggestions and address the issues raised during the consultation exercises, in preparing our proposals.
- 10 During our work we also:
- Commissioned a series of briefing notes from the Europe Unit and sought and received advice from the Unit on a range of relevant issues.
 - Conducted a small-scale survey of higher education institutions in Scotland and Wales to determine their experiences and advice on the 'administrative burden of credit'.
 - Liaised closely with the QCA, QAA and HEFCE Joint Forum for Higher Levels through observer status at its meetings. In addition, its Chair, Dick Coldwell, met and addressed a meeting of the Steering Group.

- 11 We are confident that from this solid base we have arrived at a set of proposals that are practical and workable and we believe they should be generally well-received by the sector.

Definitions

What is 'credit'?⁴

- 12 Detailed work for the original Scoping Group observed that credit can serve a number of purposes, be used in a variety of ways, and is understood differently by different people. Credit is, however, fundamentally a tool for assessing the equivalence of learning achieved by an individual. Credit is usually defined by a specific number of credit points.
- 13 In the UK higher education credit systems we considered (Scotland, Wales, Northern Ireland and the Credit Consortia in England) credit points quantify the outcomes of learning that are subject to valid, reliable methods of assessment. Put simply, credit points are a straightforward way of showing **how much** learning an individual has done to achieve a qualification. The **level** at which credit points are awarded is also important. This reflects a range of factors including:
- the complexity and depth of knowledge and understanding;
 - links to associated academic, vocational or professional practice;
 - the degree of integration, independence and creativity required;
 - the range and sophistication of application/practice; and
 - the role(s) taken in relation to other learners/workers in carrying out tasks.
- 14 Together with these level descriptors, credit points allow students, institutions and employers to compare different qualifications on the same or different levels.
- 15 Credit can serve a number of different functions. It provides a mechanism for higher education institutions to design modules/programmes in different disciplines that are similar in volume and intellectual demand. It also provides a basis for recognising learning achieved in other institutions or elsewhere. Credit values and levels give information about the amount of learning and academic demands of that learning. The award of credit indicates satisfactory completion of a module but it does not reveal further information on the quality of the student performance.

- 16 In the UK higher education sector, existing credit systems operate on the basis that, whilst all learning may be expressed in terms of credit values, not all credit can or will necessarily be accumulated towards a specific programme or award. Each higher education institution, in agreement with partner organisations where appropriate, determines what credit, offered by a student, it will accept for the purposes of accumulation or transfer. Our proposals go with the grain of this existing practice.

What is a credit framework?

- 17 To widen their currency beyond a single institution, credit points and levels are often organised into local, regional or national frameworks. A credit framework is a means of setting down the recommended overall credit requirements for specific qualifications. Framework descriptors outline the general outcomes of learning expected at a given level. For example, the Scottish Credit and Qualifications Framework (SCQF) has twelve levels which are organised under five broad headings:
- knowledge and understanding (mainly subject based);
 - practice (applied knowledge and understanding);
 - generic cognitive skills (e.g. evaluation, critical analysis);
 - communication, numeracy and IT skills; and
 - autonomy, accountability and working with others.
- 18 Although they are not intended to give precise or comprehensive statements of required learning at each level, the descriptors allow broad comparisons to be made between the outcomes of any learning.
- 19 The Dearing Report (1997) identified a number of characteristics for a national higher education credit framework. These hold true today. The report stated: 'such a framework will:
- cater for a wide range of aspirations and achievement;
 - have recognised standards;
 - enable students to progress through higher levels, as well as move between programmes as appropriate;
 - enable attainment to be recognised, providing it can be reliably assessed;
 - articulate with other areas of tertiary education;
 - encompass vocational and academic qualifications; and
 - have standing here and abroad.

The main elements of the framework will be:

- standardised nomenclature for awards;
- agreed and common credit points at relevant levels; and
- the inclusion of additional and recognised 'stopping-off' points.⁵

20 We found that respect for institutional autonomy is fundamental to securing co-operation and realising the benefits that a credit framework can offer. The study of Scottish and Welsh sectors found that institutions that are signed up to, or actively engaged with their frameworks are clear that in doing-so, this does not in any way mean that they have to accept other people's credit. This is a fundamental principle and prerequisite for them engaging with the framework.

21 We have borne all of these issues in mind in devising and proposing a national HE credit framework for England.

Part 2: Rationale

Why do we need a credit framework?

- 22 Credit and credit frameworks can and do have a wide range of uses. A credit framework can:
- provide clarity in an increasingly diverse landscape of qualifications;
 - acknowledge and codify the diversity of higher education and professional development qualifications;
 - provide a 'route map' showing progression pathways to enable students to more easily navigate the maze of qualifications;
 - enable 'bite-size chunks' of meaningful accredited learning which can build confidence and encourage students into further learning;
 - enable students to transfer more easily between and within institutions;
 - provide a basis upon which the sector can assure itself about standards;⁶
 - enable institutional management to codify and 'tidy up' existing practice which in turn can bring other benefits;
 - provide a common language supporting curriculum development within and between HEIs; and
 - encourage and facilitate partnerships between institutions.
- 23 Arguments in favour of a national credit framework date back at least 20 years and several major reports have recommended it.⁷ In 2004 the Schwartz Final Report on *Fair Admissions* welcomed the then ongoing work of the original Scoping Group citing the lack of a national credit transfer system as a 'problem' causing 'major barriers' to students wishing to transfer between institutions and sometimes even between courses within the same institution.⁸ Also in 2004, the Johnson Report noted that over 90 per cent of institutions (of the 100 that took part) responding to its survey were using 'some type of credit system to underpin their curriculum'.⁹ The report recorded 'convergence with regard to fundamental aspects of credit practice' between the survey dates of 1999 and 2003. However, it also identified 'inconsistencies in credit practice to the potential detriment of students' and recommended that a common FE/HE Credit System for England, Wales and Northern Ireland 'should be established as soon as possible'.¹⁰
- 24 Our consultations showed overwhelming support in the sector for a national credit framework. There is also widespread support for this from other key stakeholders:
- Government acknowledged and highlighted credit in *The Future of Higher Education* as an 'increasingly important' aspect of lifelong learning;
 - Students urged that 'a single credit system should be developed centrally';¹¹
 - Employers stated that 'employers and employees alike are looking for clarity and transparency in qualifications, with a single, simple framework to which all [in this case retail] qualifications can be aligned';¹²

- Professional bodies were also positive considering 'it is essential that a common set of credit arrangements are used throughout the UK...'13; and
- A credit framework for English higher education will also help to develop strong links with further education and student progression.

25 Scotland and Wales both have active, working national credit frameworks and there are active regional consortia in England and Northern Ireland. Respect for institutional autonomy is fundamental to securing co-operation and realising the benefits that the framework can offer and the regional and national frameworks are all built on this principle. Welsh institutions debated whether the Credit and Qualifications Framework for Wales (CQFW) was or could be an 'impositional framework' or a 'compositional framework' and settled on the latter, agreeing that it could not be imposed. The Scottish Credit and Qualifications Framework (SCQF) is clearly and commonly described as 'a descriptive and enabling framework rather than a regulatory one'.14

26 Our consultations showed overwhelming support in the sector for a permissive, credit framework approach, and one which integrated with the existing Framework for Higher Education Qualifications, rather than anything more prescriptive, or fundamentally new and additional to existing arrangements. We have developed our proposals from this basis.

Part 3: Proposals

Introduction

- 27 Our proposals, summarised here, are explained in more detail in Part 4, below. The proposals are made in the context that institutions' decision-making processes regarding academic standards and quality should and will remain properly and entirely the responsibility of each autonomous institution. The application of the national guidelines on credit will remain a matter for individual institutions to decide upon at their discretion.
- 28 In addition, whilst all learning may be expressed in terms of credit values, not all credit can or will necessarily be accumulated towards a specific programme or award. Each higher education institution, in agreement with partner organisations where appropriate, will determine what credit, offered by a student, it will accept for purposes of accumulation or transfer.

Proposals

- 29 Our extensive consultation exercises revealed overwhelming support for a national credit framework, from the sector and other stakeholders. What was needed was leadership in defining and answering key questions relating to credit and the introduction of that national credit framework. On this basis we propose that:
- Credit arrangements for higher education in England should be developed at a national level by the start of academic year 2008/09.
 - The operational detail of these national credit arrangements should be developed by the English higher education sector. To achieve this a short-term credit issues development group comprising the nominees of Universities UK, GuildHE, the Quality Assurance Agency for Higher Education, the Higher Education Funding Council for England, and one or two representatives from existing credit consortia, should be established by early 2007.
 - By the start of academic year 2009/10 English higher education institutions should have credit-rated their main provision in line with the guidance (see below) prepared for the framework, and thereafter should start to include the credit value in a published description of each of the programmes they offer.
 - National credit arrangements for higher education in England should be structured as a framework that is linked to the Framework for Higher Education Qualifications (FHEQ). This will not be a one-way process. The FHEQ will require some general revision in due course in response to the national credit framework developments.

- Guidance should be drawn up. This should be broad, overarching and advisory, allowing institutions to adopt and adapt elements as appropriate to their needs and circumstances. The guidance should indicate:
 - a set of total credit values (indicated in Table 1 below) on the credit normally associated with the main higher education awards in England: (a normal full-time year of undergraduate study should be represented by 120 credits, and a full-time postgraduate year by 180 credits); and
 - expectations about the number of credits, within the overall total, normally associated with the level of the award. The numbers within Table 1 provide guidance on the number of credits normally associated with the level of the award, for the main higher education awards in England.
- to support this activity, the current FHEQ levels C, I, H, M and D should be renumbered as levels 4, 5, 6, 7 and 8 respectively.
- the summary NICATS (Northern Ireland Credit Accumulation and Transfer System) descriptors should be included within the guidance as should the Dublin descriptors of the Framework for Qualifications of the European Higher Education Area, which should be adopted as an additional reference point to the FHEQ.¹⁵
- the relevant bodies, led by the Europe Unit, should continue to monitor and inform about European Credit Transfer System (ECTS) credit developments, with the purpose of providing clear guidance on articulation between ECTS and the UK credit systems to the credit issues development group.
- the national credit arrangements should be owned by the English higher education sector and maintained by QAA on its behalf. To facilitate this Universities UK and GuildHE should be charged with joint responsibility for overseeing the framework.

30 Table 1 on the next page is a draft framework and gives an indication of total and typical credit values that might apply. The credit issues development group will take forward the refining of the values contained in this table.

Table 1: Draft national credit framework				
Main higher education awards	FHEQ level current/proposed:	FTE period of study (normal)	Normal total credit value	Normal minimum credit at level of award
Certificate in Higher Education (Cert HE)	C / 4	1 year	120	90
Diploma in Higher Education (DipHE)	I / 5	2 years (u/g)	240	90
Foundation Degree (FD)	I / 5	2 years (u/g)	240	90
Bachelors degree (BA/BSc)	I / 5	2.5 to 3 years (u/g)	300	60 at level H / 6
Bachelors degree with honours (BA/BSc hon)	H / 6	3 years (u/g)	360	90
Graduate Certificate	H / 6	4 months (grad)	60	40
Graduate Diploma	H / 6	8 months (grad)	120	90
Postgraduate Certificate in Education (PGCE) ¹⁶	M / 7	12 months	120	40
Postgraduate Certificate	M / 7	4 months (p/g)	60	40
Postgraduate Diploma	M / 7	8 months (p/g)	120	90
Masters degree (integrated) (e.g. MEng; MChem; MPhys; MPharm) (from integrated 1st and 2nd cycle programme) ¹⁷	M / 7	4 years (u/g and p/g)	480	120
Masters degree (e.g. MA; MSc; MRes) (self-standing Bologna 2nd cycle programme)	M / 7	1 year (p/g)	180	150
Doctorate (only where credit based) (e.g. EdD; DBA; DClInPsy) (Bologna 3rd cycle) ¹⁸	D / 8	3 years (p/g)	540	360
PhD / DPhil	D / 8	3 years (p/g)	Not normally credit rated	-

Part 4: Implementing the proposals

- 31 Implementing our proposals will require action by both institutions themselves and various agencies and organisations, as detailed below.

Credit issues development group

- 32 The Steering Group has prepared a set of broad proposals setting out the way forward for developing and implementing the national credit framework for England. There will be an immediate need for more detailed work refining these arrangements.
- 33 We therefore propose that a short-term credit issues development group, comprising nominees from Universities UK, GuildHE (formerly the Standing Conference of Principals), the Quality Assurance Agency for Higher Education, the Higher Education Funding Council for England and one or two representatives from existing credit consortia should be established by early 2007. The work of this group will be highly technical and this should be borne in mind in selecting membership. Draft terms of reference for the group are at Annex E. Once it reports, it can be disbanded and ongoing responsibility for the framework passed to the higher education representative bodies (see below).

The framework

- 34 Table 1, constituting a draft framework, has been compiled from existing documentation and discussions with experts and interested stakeholders in the sector and beyond. It provides a basis for how the framework should look. We believe we have managed to resolve many of the main issues. However, some aspects will require further consideration and refinement and Table 1 should be used by the credit issues development group as a basis for addressing these specific issues with the sector, prior to the framework becoming active.

Guidance

- 35 To realise the benefits of consistency that a national credit framework could yield, there will be a need for guidance. The Guidelines¹⁹ issued by the joint HE Credit Bodies for England Wales and Northern Ireland (EWNI) have been widely supported and, Johnson concluded, appear “to have exerted a positive impact over the past three years”.²⁰ Nonetheless, in our consultation exercise, the sector was hesitant about supporting the requirement for guidance on the use of level descriptors and indicative credit numbers. Most thought this would be useful but there were fears that it could become overly prescriptive. In particular there was a concern from institutions that there would be audit implications if the framework was linked to the Framework for Higher Education Qualifications (FHEQ). The study we conducted into the experiences in Scotland and Wales found that several institutions had experienced specific issues around ‘compliance’ with their frameworks, although they appeared largely comfortable in dealing with these.
- 36 We have therefore addressed institutional reservations by proposing that, although guidance should be prepared, it should be broad, overarching and, above all advisory, and that it should allow institutions to adopt and adapt elements appropriate to their needs and circumstances. The QAA will wish to ensure that institutional auditors are clear about this. Thus the guidance will remain a matter for individual institutions to decide upon at their discretion. For example, matters relating to compensation for or condonement of failure will remain at the specific discretion of each institution, although institutions should make available clear information on how they reach decisions on these matters.
- 37 Pragmatism and flexibility are key to engaging with a national framework and we have concluded that our proposals manage to achieve the right balance between the need for consistency at a national level and the need to avoid prescription and respect institutional autonomy. The responses to our second consultation exercise confirm that the sector largely endorses this approach and indeed its support for the proposals is predicated upon this balance being maintained.
- 38 The Steering Group recommends that by the start of academic year 2008/09, the credit issues development group should have developed guidance, which is clear and enabling and which addresses, among other things:
- level descriptors and their use (including addressing the issue of how these will dovetail with internationally agreed level descriptors);
 - typical credit values (including a discussion of practice relating to compensation and condonement, ‘normal’ and ‘minimum’ but with the final judgement to be left to institutions); and
 - learning outcomes.

Credit rating provision and mapping onto the framework

- 39 The Group's initial consultation exercise found a great deal of enthusiasm for a national framework but also identified an anxiety about potential 'bureaucratic burden', which might arise from this. A study of experience in Scotland and Wales explicitly investigated these issues. Where an institution's internal credit system mapped easily on to the higher education framework and the national framework (usually because the credit building blocks were compatible) few problems of burden were reported. The Steering Group was encouraged by the fact that, in general, institutions seemed to agree that the introduction of the QAA's frameworks and of national credit frameworks in Scotland and Wales had been a relatively straightforward and helpful initiative.
- 40 We concluded that there are probably more administrative benefits than burdens of introducing credit and in using a framework and that there could be much to gain and should be little to fear in the development of the national credit framework. The Steering Group acknowledges however, that there will be a need to invest in change, although, as the study found, where institutions start from will affect how burdensome they find either introducing credit or relating to a national framework.
- 41 We are encouraged by the findings of the Johnson Report – that the overwhelming majority of institutions have already done a lot of the necessary groundwork – for example 97 per cent of respondents reported that "every module has a set of learning outcomes".²¹ Nonetheless, our evidence suggests that the development and implementation of a national credit framework will have cost implications for participating institutions, which, even if they already use compatible credit, will have to do some work to align their internal arrangements to the national system. There will also be an impact on student record systems. We propose that the credit issues development group considers this issue as part of its work.
- 42 The Steering Group proposes that by the start of academic year 2009/10 English higher education institutions should have credit-rated their main provision in line with the guidance prepared for the framework and should be starting to include the credit value in a published description of each of the programmes they offer.

Europe

- 43 The Steering Group discussed at length the relationship between a national credit framework and the European Credit Transfer System (ECTS). The consultation responses from both institutions and employers clearly pointed to this as an area regarded as important, but also one which was confused and in which institutions in particular would like some clarification and leadership. Many believe that the ECTS approach – which is designed with student mobility in mind – has disadvantages compared to the UK approach. While no responses called for ECTS to be established as the English system, many called for the credit framework, eventually adopted, to fit pragmatically alongside ECTS.
- 44 ECTS itself is further developing as it progresses from a credit system, used for transfer only, to one which additionally allows for accumulation of credits. Despite the ongoing nature of this reform, the Steering Group commissioned the Europe Unit to produce guidance on articulation between the UK credit systems and ECTS as it currently stands (at Annex D). The Steering Group also proposes that the Europe Unit should continue to monitor and inform on ECTS credit developments, liaising with the credit issues development group as appropriate.

Administrative issues

- 45 The implementation of the framework will require a number of small but important administrative changes. However, apparently simple things like the renaming of levels of study can be less straightforward than they might seem and have implications for student record systems. A significant number of respondents to our second consultation exercise raised this issue. The Scottish and Welsh frameworks cover a range of qualifications beyond higher education, with a consequent renumbering of the higher education levels within those frameworks, compared to the specific higher education frameworks. Our investigations revealed, however, that, where necessary, it is possible for an institution to live with a dual nomenclature. The Steering Group proposes that the QAA should renumber FHEQ levels C, I, H, M and D as levels 4, 5, 6, 7 and 8 respectively by the start of academic year 2008/09.
- 46 Our consultation exercises found that institutions and other stakeholders would welcome a clear exposition of how the new framework would dovetail with existing frameworks, agreements and reference points. They would also find clarification of the coverage, nature and linkages of the various existing frameworks and agreements useful. We therefore propose that the credit issues development group should ensure that the summary NICATS descriptors (see Appendix B) are included within the guidance. It should also ensure that the Dublin descriptors of the Framework for Qualifications of the European Higher Education Area (see Appendix C) are adopted as further reference points to the FHEQ.

Explaining credit and the framework

- 47 The study of experience in Scotland and Wales which we commissioned, found that the introduction of a credit framework has provided a useful common language for sector professionals, who choose to learn that language, to talk to themselves. As it becomes more widely adopted, however, it will be important for a wider range of stakeholders to understand it. The need for clarity in the issues was both explicit and implicit in the consultation responses from within the sector and without. Employers, in particular asked, “please keep it simple”²², adding that they could make use of credit, “without needing to see all the wires”²³.
- 48 At the same time, credit and credit frameworks are generally much-vaunted as tools for use by the learner. The Steering Group has therefore concluded that students will need additional help with interpretation if they are to make full use of the framework. We are particularly concerned to ensure that students are not misled into thinking that the framework provides a guarantee of automatic access or progression. To this end, we have commissioned, in tandem with this report, *A Guide to Credit in Higher Education in England* with a view to clarifying concepts and issues, which will be published by the end of 2006.

Non-participation

- 49 Our consultations with the sector have shown there is an overwhelming enthusiasm for moving forward on these issues. They also revealed a small core of institutions that were uncertain or definitely would not, at this stage, wish to participate in a national framework. While the Steering Group hopes that these institutions will eventually be persuaded of the merit of the national framework, respect for institutional autonomy has been paramount in our thinking. The Steering Group suggests that those few institutions which choose not to engage with the national framework nonetheless be cognisant of the arrangements so that any systems they develop locally are not discordant.

Ongoing monitoring

- 50 The experience of other frameworks suggests that they are still evolving with more (and different) qualifications, awards (and types of awarding body) entering the framework. There is therefore a need for ongoing dialogue about operational issues. We have noted that there are disagreements about the nature, purpose and future of existing national frameworks – as well as their potential – between different stakeholder groups. There will also therefore be a need for some form of ongoing national representation of higher education’s interests in any wider discussions about the national credit framework. This will apply particularly where there is a need to interface with other credit frameworks and in engaging with other parts of the UK and beyond. Finally, it will be important to safeguard institutional autonomy and guarantee that the framework is, and remains, flexible and pragmatic in tone.
- 51 For all of these reasons we have concluded that the English higher education sector must have responsibility for the framework and through its representative bodies (UUK and GuildHE) ask that QAA maintains the framework on its behalf.

Part 5: Conclusions, summary and next steps

Conclusions and summary

52 We have concluded that there are longstanding, strong and reasoned arguments for developing and using a national credit framework for higher education in England as soon as practicable. Within the context of individual institutional academic autonomy, which allows for institutions to apply national guidelines at their discretion, we propose that:

- Credit arrangements for higher education in England should be developed at a national level by the start of academic year 2008/09.
- The fine operational detail of these national credit arrangements should be developed by a credit issues development group on behalf of the English higher education sector.
- By the start of academic year 2009/10, English higher education institutions should have credit-rated their main provision and thereafter should start to include the credit value in a published description of each of the programmes they offer.
- National credit arrangements for higher education in England should be structured as a framework that is linked to the Framework for Higher Education Qualifications (FHEQ).
- Guidance should be drawn up by the CIDG. This should be broad, overarching and advisory, allowing institutions to adopt and adapt elements as appropriate to their needs and circumstances. The guidance should indicate:
 - the total credit value normally associated with the main higher education awards in England: (for example, a normal full-time year of undergraduate study should be represented by 120 credits, and a full-time postgraduate year by 180 credits); and
 - expectations about the minimum number of credits, within the overall total, normally associated with the level of the award.
- The Europe Unit should lead in continuing to monitor and inform about European Credit Transfer System (ECTS) credit developments, with the purpose of providing clear guidance on articulation between ECTS and the UK credit systems to the credit issues development group.
- The national credit arrangements should be owned by the English higher education sector and maintained by QAA on its behalf.

Next steps

- 53 We have proposed that a credit issues development group should take forward the detailed work on making the framework active. It will be for the credit issues development group to decide how to go about this but we propose the following timetable and areas for further action to assist it with its work.

Timetable

- 54 The following proposed timetable, at Table 2, is based on consultation with the sector and represents the Steering Group's suggestion of a reasonable timescale for implementing its proposals.

TABLE 2: Implementing the national credit framework: Proposed timetable		
ACTION	ACTORS	DEADLINE
A standing credit issues development group, comprising technical experts, should be established	UUK, GuildHE, QAA, HEFCE and representatives from existing credit consortia	by early 2007
The draft framework should be refined and 'finalised' following identification and addressing of unresolved issues and a national credit framework detailing credit arrangements for HE in England should be in place	Credit issues development group	by start of academic year 2008/09
Guidance to support the framework should be developed. In drawing this up it will be necessary to oversee or initiate the following:	Credit issues development group	by start of academic year 2008/09
Renumbering FHEQ levels C, I, H, M and D as levels 4, 5, 6, 7 and 8 respectively	QAA	
Generally revising the FHEQ in response to national credit framework developments	QAA	
Including the summary NICATS descriptors within the Guidance	Credit issues development group	
Adopting the Dublin descriptors of the Framework for Qualifications of the European Higher Education Area as additional reference points to the FHEQ	QAA and credit issues development group	
All main HE provision offered in HEIs should be credit-rated in line with the guidance	All participating English higher education institutions	by start of academic year 2009/10
Credit values should be included in published descriptions of HE programmes	All participating English higher education institutions	Starting in academic year 2009/10 at the latest
Clear guidance should be issued on articulation between ECTS and the UK credit systems	Europe Unit to monitor ECTS credit developments and inform the credit issues development group	Ongoing
The framework will need to be overseen and maintained	Universities UK, GuildHE and QAA	Ongoing

Issues for the future

- 55 National credit frameworks are not static. We have already identified a number of ongoing issues which will need to be monitored and acted upon accordingly. These include general operational issues and handling of 'anomalies'; interface and potential integration with other frameworks – in further education and other parts of the UK and beyond; and interface with ECTS and European requirements. The Steering Group invites the credit issues development group to note this advice. It will provide a technical note detailing the specific issues raised during the consultation exercises to the credit issues development group in due course.

Appendix A

Glossary of terms

APEL	Accreditation of prior (experiential) learning
CQFW	Credit and Qualifications Framework for Wales
ECTS	European Credit Transfer (and Accumulation) System
EHEA	European Higher Education Area
EWNI	England Wales and Northern Ireland
FE	Further education
FfA	Framework for Achievement
FHEQ	Framework for Higher Education Qualifications
HE	Higher education
HEFCE	Higher Education Funding Council for England
HEIs	Higher education institutions
LLNs	Lifelong learning networks
LSC	Learning and Skills Council
NICATS	Northern Ireland Credit Accumulation and Transfer Scheme
NQF	National Qualification Framework
QAA	Quality Assurance Agency
QCA	Qualifications and Curriculum Authority
SCOTCATS	Scottish Credit Accumulation & Transfer Scheme
SCQF	Scottish Credit and Qualifications Framework
SSDA	Sector Skills Development Agency

Appendix B

Summary of NICATS (Northern Ireland Credit Accumulation and Transfer Scheme) descriptors²⁴

FHEQ level C / proposed level 4:

- develop a rigorous approach to the acquisition of a broad knowledge base;
- employ a range of specialised skills;
- evaluate information using it to plan and develop investigative strategies and to determine solutions to a variety of unpredictable problems; and
- operate in a range of varied and specific contexts, taking responsibility for the nature and quality of outputs.

FHEQ level I / proposed level 5:

- generate ideas through the analysis of concepts at an abstract level with a command of specialised skills and the formulation of responses to well defined and abstract problems;
- analyse and evaluate information;
- exercise significant judgement across a broad range of functions; and
- accept responsibility for determining and achieving personal and/or group outcomes.

FHEQ level H / proposed level 6:

- critically review, consolidate and extend a systematic and coherent body of knowledge, utilising specialised skills across an area of study;
- critically evaluate concepts and evidence from a range of sources;
- transfer and apply diagnostic and creative skills and exercise significant judgement in a range of situations; and
- accept accountability for determining and achieving personal and/or group outcomes.

FHEQ level M / proposed level 7:

- display mastery of a complex and specialised area of knowledge and skills, employing advanced skills to conduct research, or advanced technical or professional activity, accepting accountability for related decision making including use of supervision.

FHEQ level D / proposed level 8:

- make a significant and original contribution to a specialised field of inquiry demonstrating a command of methodological issues and engaging in critical dialogue with peers; and
- accepting full accountability for outcomes.

Appendix C

Dublin descriptors of the Framework for Qualifications of the European Higher Education Area

The Framework for Qualifications of the European Higher Education Area²⁵

	Outcomes	ECTS Credits
Short cycle (within or linked to the first cycle) qualification	<p>Qualifications that signify completion of the higher education short cycle (within or linked to the first cycle) are awarded to students who:</p> <ul style="list-style-type: none">• have demonstrated knowledge and understanding in a field of study that builds upon general secondary education²⁶ and is typically at a level supported by advanced textbooks; such knowledge provides an underpinning for a field of work or vocation, personal development, and further studies to complete the first cycle;• can apply their knowledge and understanding in occupational contexts;• have the ability to identify and use data to formulate responses to well-defined concrete and abstract problems;• can communicate about their understanding, skills and activities, with peers, supervisors and clients;• have the learning skills to undertake further studies with some autonomy.	Approximately 120 ECTS credits

	Outcomes	ECTS Credits
First cycle qualification	<p>Qualifications that signify completion of the first cycle are awarded to students who:</p> <ul style="list-style-type: none"> • have demonstrated knowledge and understanding in a field of study that builds upon their general secondary education, and is typically at a level that, whilst supported by advanced textbooks, includes some aspects that will be informed by knowledge of the forefront of their field of study; • can apply their knowledge and understanding in a manner that indicates a professional²⁷ approach to their work or vocation, and have competences²⁸ typically demonstrated through devising and sustaining arguments and solving problems within their field of study; • have the ability to gather and interpret relevant data (usually within their field of study) to inform judgements that include reflection on relevant social, scientific or ethical issues; • can communicate information, ideas, problems and solutions to both specialist and non-specialist audiences; • have developed those learning skills that are necessary for them to continue to undertake further study with a high degree of autonomy. 	Typically include 180-240 ECTS credits

	Outcomes	ECTS Credits
Second cycle qualification	<p>Qualifications that signify completion of the second cycle are awarded to students who:</p> <ul style="list-style-type: none"> • have demonstrated knowledge and understanding that is founded upon and extends and/or enhances that typically associated with the first cycle, and that provides a basis or opportunity for originality in developing and/or applying ideas, often within a research²⁹ context; • can apply their knowledge and understanding, and problem-solving abilities in new or unfamiliar environments within broader (or multidisciplinary) contexts related to their field of study; • have the ability to integrate knowledge and handle complexity, and formulate judgements with incomplete or limited information, but that include reflecting on social and ethical responsibilities linked to the application of their knowledge and judgements; • can communicate their conclusions, and the knowledge and rationale underpinning these, to specialist and non-specialist audiences clearly and unambiguously; • have the learning skills to allow them to continue to study in a manner that may be largely self-directed or autonomous. 	<p>Normally carry 90-120 ECTS credits – the minimum requirements should amount to 60 ECTS credits at the second cycle level</p>

	Outcomes	ECTS Credits
Third cycle qualification	<p>Qualifications that signify completion of the third cycle are awarded to students who:</p> <ul style="list-style-type: none"> • have demonstrated a systematic understanding of a field of study and mastery of the skills and methods of research associated with that field; • have demonstrated the ability to conceive, design, implement and adapt a substantial process of research with scholarly integrity; • have made a contribution through original research that extends the frontier of knowledge by developing a substantial body of work, some of which merits national or international refereed publication; • are capable of critical analysis, evaluation and synthesis of new and complex ideas; • can communicate with their peers, the larger scholarly community and with society in general about their areas of expertise; • can be expected to be able to promote, within academic and professional contexts, technological, social or cultural advancement in a knowledge-based society. 	Not specified

Annex A

Scoping Group recommendations relating to credit issues

The original Measuring and Recording Achievement Scoping Group made a series of recommendations relating to credit. These were:

Recommendation 9

Since it will be necessary to achieve a common understanding in developing credit proposals – credit terminology, the relationship between credit systems and qualification frameworks, and their respective functions and parameters, should be defined and agreed.

Recommendation 10

The stakeholder organisations should strive for a common higher education credit system in England, Wales and Northern Ireland which would help facilitate continued developments of local/regional schemes for student progression.

Recommendation 11

Following agreement on a credit system, a concerted effort should be made to achieve more consistent and widespread use of credit in higher education. The developments should take into account current developments in Wales, Northern Ireland, Scotland and in further education in England.

Recommendation 12

The sector should closely monitor and engage with the development of the European Credit Transfer System (ECTS) as the common European credit system.

Annex B

Measuring and Recording Student Achievement Terms of reference and membership of the Steering Group

Terms of reference

- To consider and consult on practical proposals for the implementation of the recommendations contained in the report of the Measuring and Recording Student Achievement Scoping Group.
- Any proposals will need to consider and clearly highlight the differing needs and stages of development of the nations of the UK.
- To work with the sector to ensure support for and ownership of any proposed changes.
- To work with and consult wider stakeholders to identify and take account of their needs.
- To ensure a holistic approach to the issues is adopted, drawing upon a wide range of relevant work.

Membership

Professor Robert Burgess (Chair)	Vice-Chancellor, University of Leicester
Professor Kenneth Bell	Pro-Vice-Chancellor, Queen's University Belfast
Professor Patricia Broadfoot	Pro-Vice-Chancellor, University of Bristol/ then as: Vice-Chancellor, University of Gloucestershire (from 1 September 2006)
Dame Sandra Burslem	Vice-Chancellor, Manchester Metropolitan University (retired August 2005)
Jim Crewdson	Principal, Wigan and Leigh College
Carl Gilleard	Chief Executive, Association of Graduate Recruiters
Julian Nicholds (succeeded by Wes Streeting from September 2006)	Vice-President Education, National Union of Students
Professor Donald Pennington	Pro-Vice-Chancellor, Coventry University
Professor Paul Ramsden	Chief Executive, Higher Education Academy
Professor Muriel Robinson	Principal, Bishop Grosseteste University College Lincoln
Professor Alasdair Smith	Vice-Chancellor, University of Sussex
Susan Tuckett	Principal, Norwich School of Art and Design
Professor Simon van Heyningen	Vice-Principal, University of Edinburgh
Professor David Vaughan	Principal, Cumbria Institute of the Arts
Peter Williams	Chief Executive, Quality Assurance Agency
Professor Michael Worton	Vice-Provost, University College London

Observers/corresponding members

Dr Liz Beaty	Director, Learning and Teaching, HEFCE
Tish Bourke	Manager, UK Higher Education Europe Unit
Professor Phil Gummett	Chief Executive Officer, HEFCW
Professor Nick Harris	Director, Development and Enhancement Group, QAA
Dr Bill Harvey	Deputy Director, Learning and Teaching, Scottish Funding Council
Celia Hunt	Head of Learning and Teaching, HEFCW
Karen Jones	Senior Learning and Teaching Manager, HEFCW/then as: Policy Adviser, Higher Education Wales (from 3 April 2006)
Sean Mackney	Head of Learning and Teaching, HEFCE
Gerard Madill	Policy Adviser, Universities Scotland
Dr Jayne Mitchell	Assistant Director, Development and Enhancement Group, QAA
Dr Sofija Opacic	HE Policy & Research Analyst, National Union of Students
Graeme Rosenberg	Senior Policy Adviser, HEFCE
Jane Tory (succeeded by Steve Ingham/Philip Lomas)	Department for Education and Skills

Secretariat

Greg Wade	Policy Adviser, Universities UK
Helen Bowles	Policy Adviser, GuildHE (formerly the Standing Conference of Principals)
Nicola Berkley	Project Officer, Universities UK

Consultant

Jane Denholm	Director, Critical Thinking
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Annex C

Methodology

Measuring and Recording Student Achievement Scoping Group

The Scoping Group, chaired by Professor Robert Burgess, was established by the representative bodies with support from the funding councils in October 2003. The Group issued *Measuring and recording student achievement* in 2004, which included recommendations for the development of a common credit system for higher education in England.

Whilst the Scoping Group was established to consider the recommendations of the Higher Education White Paper (2003), which refers predominately to England, it was recognised that many of the issues had a UK-wide interest. A wide range of expertise was drawn upon in the work of a credit systems sub-group that was established.

Measuring and Recording Student Achievement Steering Group

The Steering Group, chaired by Professor Robert Burgess, was established by the representative bodies with support from the funding councils in February 2005 to take forward the recommendations of the Scoping Group. The Group held regular meetings, and met on 14 occasions up to the point that this report was produced. The membership of the Steering Group reflected a wide range of institutions, all the nations of the UK, and a wide range of organisations. The Steering Group was greatly helped by the work of the QAA and the Europe Unit.

Credit consultations

The Steering Group issued two consultation documents. The first was, *Proposals for national credit arrangements for the use of academic credit in higher education in England*, issued in September 2005. The second was, *Proposals for national credit arrangements for the use of academic credit in higher education in England – second stage consultation*, issued in March 2006. Both consultations were circulated to higher education institutions, employer groups, student groups, and other organisations. 119 responses (including 74 from English HEIs) were received in response to the first consultation, and 67 responses (including 48 from English HEIs) were received in response to the second stage consultation.

Conference events

The Steering Group held two consultative conference events on the subject of credit. These events took place on 23 March 2006 in Manchester, and on 5 April 2006 in London. The two events were attended by a total of 103 delegates from higher education institutions throughout England. Delegates included pro-vice-chancellors, academic registrars, heads of quality, and administrative staff.

Annex D

Note from the UK Higher Education Europe Unit: Guidance on articulation between the European Credit Transfer System (ECTS) and the UK's credit systems

Introduction

- 1 This paper, commissioned by the Burgess Group from the Europe Unit³⁰, sets out guidance for the higher education sector on articulation between ECTS and UK credit systems.
- 2 Before concluding with advice for UK higher education institutions, the paper comments on ECTS' use as a 'mobility instrument' of the European Union as well as related developments of the Bologna Process.
- 3 While the Burgess Group's proposals for national credit arrangements for use of academic credit in higher education refer only to England, this guidance refers equally to Scotland and Wales. Indeed, given that Scotland and Wales already have integrated credit and qualification frameworks in place, the advice reflects and builds on existing practice in these devolved countries.

Background

- 4 The consultation of the Burgess Group on *Proposals for national credit arrangements for the use of academic credit in higher education in England* included the following recommendation: "that the relevant bodies, lead by the UK HE Europe Unit, continue to monitor and inform ECTS credit developments with the purpose of providing clear guidance on articulation between ECTS and the UK credit systems."³¹
- 5 There were over 30 sector responses to the consultation which referred to ECTS, with a majority commenting positively on the above recommendation. No responses to the consultation explicitly called for ECTS to be introduced as the credit system to be established in England. A common call from institutions was for guidance on articulation between ECTS and UK credit systems. A small number of responses also commented on the more sophisticated nature of credit systems used in England/UK as compared to ECTS, for example ECTS in failing to differentiate between levels, results in a crude system for transfer and progression. (Please see paragraph 23.)

Guidance for the UK higher education sector

- 6 The European Union formally lacks competence to legislate in education, as this is a policy area reserved for member-states only. Under EU law, the Commission however may seek to promote the quality of education as well as increase the mobility of European citizens. The EU's Socrates mobility programme is funded to meet these objectives.

ECTS: European Union recognition tool

- 7 ECTS was initially launched in 1989 as pilot scheme within the framework of the (Socrates) Erasmus Programme. The system was introduced to facilitate the recognition of periods of study abroad and thus enhance the quality and volume of student mobility in Europe.
- 8 Following its initial success, all higher education institutions participating in the Erasmus programme are now strongly recommended to use ECTS points for transfer. For this reason the large majority of higher education institutions in the UK use ECTS for transfers within the European area and to recognise learning gained by students on exchange visits with institutions elsewhere in Europe.
- 9 While in 1989, ECTS was limited to a credit system for transfer, in recent years, in response to the Bologna Process, it has been developing as a system for credit accumulation as well as for transfer. Additionally, and importantly, although ECTS was initially conceived as a measure of workload, it has now also been further developed to include the concepts of learning outcomes.
- 10 Detailed information on ECTS is set out in a European Commission document, *Users' Guide to ECTS*, last published in August 2004³². The document itself has not been subject to the European Union formal decision-making procedures and has not been approved by ministerial representatives, therefore UK higher education stakeholders continue to raise concerns about the system. The ECTS Guide refers to the following key feature of ECTS:
 - "ECTS is based on the principle that 60 credits measure the workload of a full-time student during one academic year. The student workload of a full-time study programme in Europe amounts in most cases to around 1500–1800 hours per year and in those cases one credit stands for around 25 to 30 working hours." While UK higher education stakeholders indicate that this 1500–1800 workload has not been confirmed by any detailed study³³, it is also argued it would not exclude full-time programmes of 1200 **notional** hours of learning or a situation where 1 ECTS credit (2 credits in UK systems) would approximate 20 **notional** hours of learning. (Please see paragraph 20.)

- “Credits in ECTS can only be obtained after successful completion of the work required and appropriate assessment of the learning outcomes achieved. Learning outcomes are sets of competences, expressing what the student will know, understand or be able to do after completion of a process of learning, long or short.”
- “Student workload in ECTS consists of the time required to *complete* all planned learning activities such as attending lectures, seminars, independent and private study, preparation of projects and examinations.” UK stakeholders rather argue that learning is to be *achieved* as an on-going process, rather than formally *completed*.
- “Credits are allocated to all educational components of a study programme (such as modules, courses, placements, dissertation work, etc) and reflect the quantity of work each component requires to achieve its specific objectives or learning outcomes in relation to the total quantity of work necessary to complete a full year of study successfully.”
- “The performance of the student is documented by a local/national grade, for example on the Diploma Supplement. It is good practice to add an ECTS grade, in particular in case of credit transfer, that is periods of study undertaken elsewhere, upon which the student returns to complete their degree at the home institution.” The ECTS Guide also indicates that the ECTS grading scale ranks the students on a statistical basis; although UK higher education stakeholders have indicated that this does not work well alongside all grade systems (see paragraph 23). It is important to note, that under ECTS rules, it is not obligatory to use the grading scale.

11 An amended draft version of the Commission’s Guide further indicates that the correct way to allocate credits is to: “base the allocation of credits to the different components of a study year on a realistic estimation of the student workload required for the average student to achieve the learning outcomes established for each of the components. Make sure that the total number of credits for a normal academic year is 60. Subsequently, check the original allocation of credits on a regular basis by gathering and analysing bottom-up information on actual student workload.”

- 12 Despite the fact that higher education systems across Europe are increasingly using ECTS in a way which reflects learning outcomes, ECTS still retains a strong focus on workload. While the new draft of the Commission Users' Guide does state that ECTS should be based on learning outcomes, UK higher education stakeholders are concerned that given the emphasis on workload calculation, further progress in this area is required. For example the current draft Guide states that: "basing a programme on a reasonable and realistic estimate of the time required by the average learner protects all students from unrealistic and overloaded programmes...".
- 13 The European Commission, keen to see recognition of periods of study abroad and increased student mobility strongly supports ECTS, and as such now offers the award of an ECTS label³⁴ for higher education institutions which correctly use ECTS in all their degree programmes. It sets out detailed guidance on the correct and consistent use of ECTS in its Users' Guide. The new draft version has undergone consultation and is expected in the autumn. UK higher education stakeholders, consulted indirectly on the draft, have expressed various concerns, set out in paras 18–25.

The Bologna Process

- 14 Given that the European Union lacks treaty competence to legislate in the area of education the intergovernmental Bologna Process – to create the European Higher Education Area (EHEA) – was launched in 1999, with 29 Ministers signing the Bologna Declaration. The Process, in now involving 45 European countries, covers a wider geographic area than the current 25 member-states of the European Union. While the Bologna Process is voluntary, its agreed actions, known as action lines, have received ministerial approval at a number of specially convened ministerial summits. Among the six initial action lines, was the call for the establishment of a system of credits, such as ECTS. At the 2003 ministerial summit, it was agreed that ECTS should not only be a transfer system but also one for accumulation.
- 15 At the last ministerial summit, which took place in Bergen in 2005, ministers approved the Framework for Qualifications of the European Higher Education Area³⁵. This framework consists of three main cycles, with cycle descriptors in the form of generic qualification descriptors (known as the Dublin descriptors) to be used as reference points.
- 16 The framework also set out guidelines for the association of credits with qualifications within national frameworks:
- short-cycle (within or linked to the first cycle) qualifications may typically include/be represented by approximately 120 ECTS credits;
 - first-cycle qualifications may typically include/be represented by 180–240 ECTS credits;

- second-cycle qualifications may typically include/be represented by 90-120 ECTS credits – the minimum requirement should amount to 60 ECTS credits at second-cycle level; and
 - third-cycle qualifications do not necessarily have credits associated with them.
- 17 Unlike the ECTS Users' Guide, the government-approved Bologna Framework for Qualifications is fully based on learning outcomes and makes no reference to the recommended number of hours of study per year. Rather the framework aims to, "allow higher education institutions and credential evaluators to move away from measurement indicators that focus on formal procedures (admissions criteria, length of studies, qualification titles, years/hours of study undertaken) to focus on the results of learning.³⁶"

ECTS: Current challenges for UK higher education

- 18 At the launch of ECTS, there was some debate about average student workload across Europe, alleged to be approximately 1500-1800 hours across Europe. This was roughly translated as 25 to 30 working hours per credit. For UK higher education institutions, tending to have shorter academic terms, the perceived average of hours was suggested to be closer to 1200. This therefore was equated to approximately 20 hours per credit.
- 19 UK higher education stakeholders challenge whether the estimates of workload across and even within Bologna countries are consistent and comparing 'like with like'. The use of 1200 notional learning hours (NLH) within the UK higher education system, derives from an estimate of 40 hours notional learner effort per week, multiplied by 30 weeks. It could be argued that considerably more learner effort takes place during the extended vacations and that this is not taken into account in the total NLH for an academic year – this suggests that in practice the UK average is actually much closer to the suggested 1500 European norm. (Although the 1500-1800 hours for continental Europe has also not been verified.) It is however important to stress that in the UK, these hours should only be regarded as *notional*, measuring the total learning time of an average student to address the learning outcomes at the given level when progressing from the previous level. In any event, it should be stressed that NLH is an **approximate** measure – it is neither rigid nor exact, but it is a useful tool for academics and learners to plan learning. The use of 120 credits and 1200 NLH is firmly embedded wherever credit is used across the UK. It is also the most common international credit 'tariff' outside Europe and is now used in South Africa, Australia and New Zealand. It is crucial for UK higher education that this practice is able to continue without being marginalised within ECTS guidance. Across Europe there will always be variations between 20–30 notional hours per credit and similarly between 1200-1800 hours per year estimate. What is essential is that quality assurance systems verify outcomes and learning achieved by students.

- 20 Despite numeric discrepancies, the UK higher education sector has consistently argued that 60 ECTS points can be allocated to a regular full-time undergraduate study programme. This corresponds to credit consortia (and credit and qualifications frameworks of Scotland and Wales) normal practice of allocating 120 UK credit points, which in turn translates to 60 ECTS credits. This led to the common practice of dividing UK credits by two to arrive at ECTS credits. This has been accepted by European Commission officials, who advised the Scottish sector “to divide by two”.
- 21 However, since publication of the ECTS Users’ Guide, confusion has arisen over the allocation of ECTS credits to second-cycle (master’s level) qualifications. Current practice across the UK’s credit systems is to award 180 (UK) credits to a master’s level qualification. The Commission’s Guide states however that a, “a full calendar-year programme designed to require 52 weeks of full-time study (no summer holidays) would normally have a work load of 75 credits”³⁷. Thus, as 90 ECTS credits was not being accepted for a 180 master’s qualification the UK practice of dividing credits by two was seen as no longer possible. This raised concerns, because if UK masters could only be allocated 75 ECTS, they could appear to be lightweight, and of lower quality, when compared to the continental norm of 120 ECTS (for a two academic-year second-cycle qualification). UK stakeholders argue however that given that masters qualifications in the UK match the second-cycle qualification descriptor of the Bologna Process in terms of learning outcomes, the Commission’s ‘ruling’ is unjustified. As such UK higher education stakeholders do not accept that the one calendar-year masters can only acquire 75 ECTS credits³⁸. (It is worthy of note that in the Republic of Ireland, one-year masters degrees are allocated 90 ECTS credits.)
- 22 UK higher education stakeholders have expressed a number of other concerns with ECTS, in particular that the ECTS Users’ Guide is unclear in its expression of the relationship between student workload (expressed in time, years/hours) and learning outcomes. While the new draft Guide (2006) is clearer about the relationship between workload and learning, it continues to over focus on workload and as such fails to take account the reality of lifelong learning; that qualifications are designed to be delivered faster or slower than the traditional academic patterns.
- 23 A further major issue concerns the current inability of ECTS to provide for both the classic ‘credit transfer’ and the ‘credit accumulation’ and as such the failure of the ECTS Guide to distinguish sufficiently between credit transfer and accumulation functions. The absence of the concept of levels within ECTS is also referred to, given that the UK academic qualification frameworks require demonstration of increasing abilities in critical thinking and independent thought as learners progress to higher ‘academic’ levels. The ECTS grading scale ranking students on a statistical basis is also criticised by UK higher education stakeholders given it is compatible for grading systems which are norm-referenced, but not those which are criterion-referenced.

- 24 Lastly, there is some concern about the non-transparent process by which ECTS rules are agreed and in particular the absence of a full and open consultation on the new ECTS Users' Guide. Similarly it is essential that details of credit accumulation arrangements remain issues for institutions and national higher education systems.
- 25 In view of these major issues and that ECTS itself is still undergoing reform – as it develops into a credit system with transfer and accumulation functions – the Burgess group offers the following advice to higher education institutions.

Advice to higher education institutions

- 26 In the modern higher education environment of differing modes of study, and moves away from the traditional full-time learner, comparison and recognition of qualifications in terms of recognised learning outcomes alongside notional hours is essential, rather than a focus on the rigid number hours spent studying. In recognising this, the Bologna Framework for Qualifications of the EHEA has entrenched learning outcomes at its core. Furthermore in light of the diversity of systems of a European higher education Area of 45 countries, for example in terms of academic term length, this more flexible approach is essential.
- 27 With regard to concerns on the suggested imbalance in study hours between the UK and other European higher education systems, it is important that ECTS is not regarded as an exact science or mathematical exercise. An over-focus on metrics risks diverting European higher education attention away from the need to design and deliver higher education programmes which are relevant and fit for purpose in the modern higher education environment. This includes securing the acceptability of the bachelor's degree for a range of purposes including, employment; admission to a master's; providing information to employers, students and others on the attainments of students other than 'knowledge' and 'time spent' and; in supporting the delivery of programmes through new modes of learning.
- 28 The Scottish and Welsh credit systems (as well as most other international systems) are based on learning outcomes alongside volume of study, where one credit represents ten notional hours of learning. It is essential that the final English-wide credit system is able to articulate with these credit systems in the rest of the UK to facilitate the movement of students within the UK and elsewhere internationally. Hence the Burgess recommendation, explicitly equating 1 credit point to 10 notional hours of learning. However it should be noted that the credit point is for 10 *notional* hours. In an increasingly lifelong learning environment, where it is difficult to state rigidly the time it takes a student to learn, it is important to emphasise that the learning 'time' is regarded as a broad estimate.

- 29 The notional hours of learning in UK credit systems is a proxy measure of the volume of the learner effort required by the average learner at that time to achieve the required learning outcomes of the programme. In this way notional hours of learning must, only, be employed as a rough guide.
- 30 The credit systems in place in Wales and in particular Scotland offer examples of good practice in this area. In Scotland, one SCOTCATS (The Scottish Credit Accumulation & Transfer Scheme) credit represents the outcomes achievable for the average student through 10 notional hours of learner effort. In line with key ECTS features, it is then formally declared that one ECTS is equivalent to 2 SCQF (Scottish Credit and Qualifications Framework). Given that the post-graduate qualification is, on average, one-third longer than an undergraduate year, it follows that a third more credits are allocated, ie 180 as opposed to 120. This translates to 60 ECTS credits per undergraduate year and 90 per post-graduate year of study³⁹. (While the CQFW (Credit and Qualifications Framework for Wales) lacks formal articulation, a similar approach is employed.) It is recognised that this pragmatic, simplistic approach used in Scotland and in Wales is necessary to bring about alignment between national and European credit frameworks.
- 31 The legitimacy of the Commission in stating that a maximum of 75 ECTS credits is permissible for a calendar-year qualification is queried by UK HE higher education stakeholders given that this is a matter for individual HE higher education systems, on the basis of learning outcomes for that period of study. UK higher education stakeholders will therefore continue to lobby for ECTS to be further reformed and for the removal of this 75 ECTS/calendar year reference from new Users' Guide. It is also important to bear in mind that UK higher education institutions offer a variety of master's degrees, such as two-year research awards, and as such not all UK second-cycle awards are of one-year duration.
- 32 Given the superiority of the Bologna Process Framework for Qualifications of the EHEA as opposed to the current EU ECTS rules – in terms of ministerial approval and recognition of modern learning environment – higher education institutions are advised to allocated ECTS credits on the basis of learning outcomes, and notional hours of learning. Thus, as one full-time undergraduate year is considered to be 120 credits, then on the basis of 1 ECTS deemed to be equivalent to 2 credits, this equates to 60 ECTS credits. Similarly a post-graduate year on the basis of 180 credits, equates to 90 ECTS credit points. This brings UK qualifications in line with the Bologna Framework for Qualifications in the EHEA. In view of the absence of levels within ECTS, higher education institutions are advised to work with FHEQ (Framework for Higher Education Qualifications) levels⁴⁰.

- 33 To be clear, UK institutional credit practice is fully compliant with the Bologna reforms and any criticisms of the one full-year master's degree should be countered with this fact, as such any evaluation of programmes should focus on learning outcomes and not crude time measures.
- 34 As the concept of learning outcomes and competencies becomes more familiar across Europe as a result of the Bologna Process, HEIs will be able to allocate agreed credit points to qualifications following agreement on programme learning outcomes with partners. Issues relating to condonment and /or compensation of credit remain issues for institutional/national level debate.

Conclusion

- 35 As ECTS undergoes further reforms, the Europe Unit will continue to monitor and advise about ECTS developments, with the purpose of providing clear guidance on articulation between ECTS and the UK credit systems to UK stakeholders on the credit issues development group.

Annex E

Draft terms of reference for proposed credit issues development group

The Steering Group proposes that a credit issues development group (CIDG) should be established for a limited, short, term to carry out the detailed work refining the arrangements for a national credit framework for England. The work of this group will be highly technical and this should be borne in mind in selecting membership. Once it reports, it can be disbanded and ongoing responsibility for the framework passed to the higher education representative bodies.

In carrying out this work, the Steering Group proposes that the credit issues development group should consider adopting its guiding principles (outlined at paragraph 6 of this report).

Draft terms of reference

The credit issues development group should:

- consider the recommendations contained in the report of the Burgess Group, *Proposals for national arrangements for the use of academic credit in higher education in England*;
- in consultation with key stakeholders, make the framework operational by identifying and addressing the key anomalies and issues which remain;
- in consultation with key stakeholders, develop guidance to support the framework;
- consider the interface and potential integration with other frameworks – in further education and other parts of the UK and beyond; and interface with ECTS and European requirements; and
- have completed this work no later than the start of academic year 2008/09.

Annex F

Key references

The main reference text is the first report of the Burgess Scoping Group, which contains a full list of references. Only references to key documents are repeated here, alongside new ones.

First Burgess Report

Universities UK and SCOP (November 2004) *Measuring and recording student achievement* (the "Burgess Report") report of the Measuring and Recording Student Achievement Scoping Group (the "Burgess Group") available at <http://bookshop.universitiesuk.ac.uk/downloads/measuringachievement.pdf>

Key references

DfES (2003) *The Future of Higher Education*, Norwich, TSO.

DfES (2004) *14-19 Curriculum and Qualifications Reform*, Report of the Working Group on 14-19 Reform The "Tomlinson Committee", Nottingham, DfES.

DfES (2004) *Fair Admissions to Higher Education: Recommendations for Good Practice* The Report of the Admissions to Higher Education Steering Group The "Schwartz Committee", Nottingham, DfES.

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Framework for Higher Education Qualifications (England, Wales and Northern Ireland), 2001 <http://qaa.ac.uk/academicinfrastructure/FHEQ/EWNI/default.asp>

Johnson, R. (2004) *Higher Education Credit Practice in England, Wales & Northern Ireland*, EWNI Credit Forum, Brentwood, Cravitz Printing Company Limited.

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Report of the National Committee of Inquiry into Higher Education (1997) *Higher Education in the Learning Society* (the Dearing Report), Norwich, HMSO.

Northern Ireland Credit Accumulation and Transfer System (1999) *Report of the Northern Ireland Credit Accumulation and Transfer System*, NICATS.

Robertson, D. (1994) *Choosing to Change*, London, HEQC.

Welsh, C. (2003) *Scottish Credit & Qualifications Framework – Implications for Sector Skills Councils*, Sector Skills Alliance Scotland.

Universities UK and GuildHE (2006) *A Guide to Credit in Higher Education in England*.

Websites

EPPI-Centre	www.eppi.ioe.ac.uk
Europe Unit	www.europeunit.ac.uk
GuildHE	www.guildhe.ac.uk
Higher Education Academy	www.heacademy.ac.uk
SCQF	www.scqf.org.uk
Universities UK	www.universitiesuk.ac.uk

Notes

- 1 Universities UK and SCOP (2004) *Measuring and Recording Student Achievement* Scoping Group Report (The Burgess Report) Recommendation 11
- 2 Universities UK and SCOP (2004) *Measuring and Recording Student Achievement* Scoping Group Report (the Burgess Report) Recommendation 9
- 3 Johnson, R. (2004) *Higher Education Credit Practice in England, Wales & Northern Ireland*, EJNI Credit Forum, Brentwood
- 4 This text owes much to material available on the SCQF website <http://www.scqf.org.uk/>
- 5 National Committee of Inquiry into Higher Education (1997) *Report of the National Committee* (Dearing Report) paragraphs 10.43,10.44
- 6 The Dearing Inquiry identified a national framework as “an important element in our approach to standards” National Committee of Inquiry into Higher Education (1997) *Report of the National Committee* (Dearing Report) paragraph 10.9
- 7 As the Dearing Report records, the CNA in 1986, the HEQC in 1994 and the Dearing Report itself in 1997 all called for a national framework of qualifications based on credit points at different levels. The InCCA project in 1998 and the joint HE Credit Bodies for EJNI in 2001 both provided practical guidelines on how this could be achieved.
- 8 DFES, (2004) *Fair admissions to higher education: Recommendations for good practice* The Report of the Admissions to Higher Education Steering Group The ‘Schwartz Committee’ paragraph B24 page 28
- 9 Johnson, R. (2004) *Higher Education Credit Practice in England, Wales & Northern Ireland* EJNI Credit Forum Brentwood page7
- 10 Johnson, R. (2004) *Higher Education Credit Practice in England, Wales & Northern Ireland* EJNI Credit Forum Brentwood, page 3
- 11 NUS UK response to first consultation exercise page 5
- 12 Skillsmart Retail response to first consultation exercise page 1
- 13 Institute of Industrial Engineers response to first consultation exercise page 3
- 14 Welsh, C. (2003) *Scottish Credit & Qualifications Framework – Implications for sector skills councils* Sector Skills Alliance, Scotland
- 15 The Dublin descriptors are outlined at Appendix C, and can also be accessed at: http://www.bologna-bergen2005.no/Docs/00-Main_doc/050218_QF_EHEA.pdf (p.193).
- 16 The PGCE acronym covers two awards: the Postgraduate Certificate in Education normally includes a minimum of 40 credits at Masters level; the Professional Certificate in Education is located at level H within the FHEQ and does not necessarily include any assessment at Masters level
- 17 Integrated masters degrees normally include at least four years of study (480 credits) of which at least 120 credits are at Masters level
- 18 Professional doctorate programmes include some taught elements in addition to the research dissertation. Credit practice varies but normally professional doctorates include a minimum of three years postgraduate study with masters level study representing no more than one-third of this
- 19 Joint HE Credit Bodies for England Wales and Northern Ireland (2001) *Credit and HE Qualifications: Credit Guidelines for HE Qualifications in EJNI*

- 20 Johnson, R. (2004) *Higher Education Credit Practice in England, Wales & Northern Ireland* EWNI Credit Forum Brentwood page 8
- 21 Johnson, R. (2004) *Higher Education Credit Practice in England, Wales & Northern Ireland* EWNI Credit Forum Brentwood page 2
- 22 Skillsmart Retail response to first stage consultation exercise page 2
- 23 CIHE response to first stage consultation exercise page 2
- 24 From NICATS Principles and Guidelines, available on the NICATS website at http://nicats.ac.uk/doc/scr_prnc_guide.pdf page 19
- 25 Ministry of Science, Technology and Innovation (2005) *A Framework for Qualifications of the European Higher Education Area – Bologna Working Group on Qualifications Frameworks*, Copenhagen, Grefta Tryk A/S. The report on the Framework was adopted by Ministers from Bologna Process signatory countries in May 2005 in Bergen.
- 26 General secondary education also includes vocational education with a sufficiently general component.
- 27 The word '**professional**' is used in the descriptors in its broadest sense, relating to those attributes relevant to undertaking work or a vocation and that involves the application of some aspects of advanced learning. It is not used with regard to those specific requirements relating to regulated professions. The latter may be identified with the profile/specification.
- 28 The word '**competence**' is used in the descriptors in its broadest sense, allowing for gradation of abilities or skills. It is not used in the narrower sense identified solely on the basis of a 'yes/no' assessment.
- 29 The word '**research**' is used to cover a wide range of activities, with the context often related to a field of study; the term is used here to represent a careful study or investigation based on a systematic understanding and critical awareness of knowledge. The word is used in an inclusive way to accommodate the range of activities that support original and innovative work in the whole range of academic, professional and technological fields, including the humanities, and traditional, performing, and other creative arts. It is not used in any limited or restricted sense, or relating solely to a traditional 'scientific method'.
- 30 A sector-wide organisation designed to raise awareness of European higher education and research policy: <http://www.europeunit.ac.uk/home/>
- 31 *Proposals for national credit arrangements for the use of academic credit in higher education in England*. Page 11: <http://www.universitiesuk.ac.uk/consultations/UniversitiesUK/downloads/CreditConsultation2.pdf>
- 32 http://ec.europa.eu/education/programmes/socrates/ects/doc/guide_en.pdf
- 33 The figure was derived from the EU Commission funded project, *Tuning Educational Structures in Europe* which seeks to facilitate recognition of comparable and compatible qualifications in Bologna signatory countries by describing awards in terms of workload, level, learning outcomes, competences and profile. <http://tuning.unideusto.org/tuningeu/index.php?option=content&task=view&id=3&Itemid=26>

- 34 See: http://ec.europa.eu/education/programmes/socrates/ectsselection_en.html
- 35 See: http://www.bologna-bergen2005.no/Docs/00-Main_doc/050218_QF_EHEA.pdf
- 36 Page 88, A Framework for Qualifications of the EHEA (ibid)
- 37 Page 6, *European Commission ECTS Users' Guide*, August 2004.
- 38 It is important to bear in mind that masters qualifications in the UK are of varied duration, ranging from 6, 12, and 15 months to two years, such as the MPhil; and as the Framework for Qualifications of the European Higher Education Area states, the minimum requirement at second-cycle level is 60 ECTS credits.
- 39 This approach is set out in the National description of the Scottish higher education system for the Diploma Supplement: [http://www.europeunit.ac.uk/resources/EDS Table 1-10-04.doc](http://www.europeunit.ac.uk/resources/EDS_Table_1-10-04.doc)
- 40 The framework for higher education qualifications in England, Wales and Northern Ireland: <http://www.qaa.ac.uk/academicinfrastructure/FHEQ/EWNI/default.asp>

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