

Consultation

A Universities UK/Standing Conference of Principals consultation

Measuring and Recording Student Achievement - Proposals for National Credit Arrangements for the use of academic credit in Higher Education in England Second stage consultation

The consultation paper has been produced by the Measuring and Recording Student Achievement Steering Group, chaired by Professor Robert Burgess, Vice-Chancellor of the University of Leicester.

The Steering Group is supported by Universities UK, the Standing Conference of Principals, the Higher Education Funding Council for England and other funding councils and higher education agencies. The role of the Steering Group is to bring together representatives and experts from across the UK to consider issues relating to the measuring and recording of student achievement in higher education and to recommend changes to the sector.

In September 2005 the Steering Group conducted an initial consultation on proposed principles for national arrangements in England. A large number of HEIs responded to the consultation and there was a clear consensus for developing national arrangements in England that built upon the proposed principles provided the arrangements were not in any way prescriptive and took the form of flexible and enabling guidelines. This consultation builds on the responses of the sector with more detailed proposals for taking national arrangements forward.

For further information please contact

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Consultation Paper

**from the Measuring and Recording Student Achievement
Steering Group, the 'Burgess Group'**

Proposals for National Credit Arrangements for the use of academic credit in Higher Education in England Second stage consultation

March 2006

Consultation closing date: 2 May 2006

issued by Universities UK and the Standing Conference of Principals

Supported by the Higher Education Funding Council for England, the Quality Assurance Agency for Higher Education, the Higher Education Academy, Universities Scotland, Higher Education Wales, the Scottish Funding Council, and the Higher Education Funding Council for Wales.

**Proposals for National Credit Arrangements for the use of
academic credit in Higher Education in England**

**A consultation paper
from the Measuring and Recording Student Achievement
Steering Group**

Second stage : Deadline for responses Tuesday 2 May 2006

This consultation invites further views on proposals, developed from the responses to the first consultation, for the use of credit and the development of national credit arrangements in England. Although the proposals relate to England, it is expected that many stakeholders – across the United Kingdom and beyond – will have an interest in the issues raised. Higher education institutions, student bodies, employer groups and other stakeholders are invited to address the issues contained in the paper. Responses (we would particularly welcome electronic responses) should be returned by the closing date of Tuesday 2 May 2006 to :

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Introduction from the Chair

When the English higher education sector was first invited by the White Paper *The Future of Higher Education* to address issues concerned with recording student achievement, Universities UK and the Standing Conference of Principals, supported by the Higher Education Funding Council for England, established an initial Scoping Group. The Scoping Group considered, amongst other matters, the role of credit not just in the recording of student achievement but also in providing support for students and their progression both into and within higher education. The Scoping Group made a number of specific recommendations, including some regarding credit arrangements for HE in England, and these have been taken forward by a Steering Group that includes UK wide representation.

The work of the Steering Group in drawing up its first consultation drew heavily upon that undertaken by the Credit subgroup of the original Scoping Group, and also on a recently-published (2004) survey undertaken by the England, Wales and Northern Ireland Credit Forum. This material was supplemented by discussions with HE providers and stakeholders concerned with various credit developments that are taking place throughout the UK and more widely in Europe, both in higher and further education. Particular emphasis has been placed on the application of credit in supporting students in their progression into and within higher education, and through lifelong learning.

The first consultation provided clear views and perspectives on the ways in which the majority of respondents wished to see credit arrangements for HE in England be developed at a national level. In its consideration of these, and the wealth of expertise on the application of credit within HE across the UK, the Steering Group has developed proposals within its second consultation document for national arrangements for credit in HE in England. It makes a series of proposals that would provide the basis for such arrangements, and sets out some further questions concerned with the detail of how national credit arrangements might best be structured to support institutions and, in particular, their students.

We are inviting comments from Universities and Higher Education Colleges on how national credit arrangements for England can best be developed. We would also welcome comments from students, employers, professional bodies and further education institutions. This consultation aims to establish clear agreement on basic principles that will be used as a foundation for future work. The responses to this consultation will steer the development of recommendations regarding national credit arrangements that the Group will make to the sector and to HEFCE. We are particularly keen to ensure that the arrangements for England work effectively with those in other parts of the UK, and provide the very best support for students throughout their lifelong learning. We welcome responses not just from those in England but from the UK and more widely.

We look forward to receiving your comments on this consultation

Professor Robert Burgess

Chair, Measuring and Recording Student Achievement Steering Group.

Purpose of the consultation

1. This second consultation paper on credit arrangements for HE in England has been prepared by the Measuring and Recording Student Achievement Steering Group – the ‘Burgess Group’. It is an important strand, among several, of work being taken forward by the Group, and builds upon the responses to the first consultation on proposals for national credit arrangements for higher education in England, that was undertaken through Universities UK and the Standing Conference of Principals, in the autumn of 2005.
2. This paper makes a series of recommendations that reflect the views contained within the responses to the first consultation. The paper also raises some technical considerations arising from the recommendations and poses some further questions on which the Steering Group would welcome views, before finalising all recommendations and proposals.
3. The Steering Group continues to consider it essential that in making its proposals for national credit arrangements for HE in England these should build upon elements of the extensive credit experience gained over the past decades by HEIs and the credit consortia, and should take account of and be complementary to:
 - current arrangements for curriculum development and teaching within HEIs in England
 - agreed credit frameworks for HE Scotland and in Wales.
4. The Steering Group gives high priority to the impact of such arrangements on providing support for student progression both into and within HE, and in drafting its recommendations the Group has considered it important that national credit arrangements for HE should also, as far as is possible, take account of other credit developments within pre-HE and vocational education and training in England, and elsewhere in the UK.
5. Similarly the Group has considered the views of respondents to its first consultation regarding the importance of wider perspectives and, in particular, the developments within the ‘Bologna Process’ and the establishment of the European Higher Education Area.
6. Most importantly however the Group, in making its recommendations, is also mindful of the views and particularly some concerns expressed in responses to the first consultation regarding the autonomy of HEIs, and the potential impact of any proposed additional expectations and/or changes to current practice. It notes the likely and proper interest of the Higher Education Regulatory Review Group (HERRG), and it has sought to ensure that its proposals for any new arrangements are limited only to those that are ‘necessary and sufficient’ to provide a format and guidance that can assist coherence at a national level, whilst also acknowledging the independence and autonomy of individual institutions.

Background

7. The first consultation paper outlined the developments that led to the establishment of a Framework for Higher Education Qualifications (FHEQ) in England, Wales and Northern Ireland, and credit and qualifications frameworks that include higher education, in Scotland

(SCQF) and in Wales (CQFW). It also included summaries that sought to identify the important influences that the work and developments made by the credit consortia in England, and in particular the more recent work of the England, Wales and Northern Ireland Credit Forum and the Credit Sub-committee of the Burgess Scoping Group had had in developing the proposals set out in the first consultation. This paper does not seek to re-iterate these but recalls the recommendations of the Burgess Scoping Group (2004) and a summary of the Steering Group's views on the purposes of credit as set out in the first consultation. Finally by way of background a summary of matters raised in response to the first consultation is provided.

The 'Burgess' Scoping Group (2004) recommendations on credit

8. In response to proposals within the White Paper, the Measuring and Recording Student Achievement Scoping Group issued the 'Burgess Report' (2004) which made the following recommendations in relation to credit:
 - 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 that would help to 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 a 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.

The purpose of national credit arrangements for HE in England

9. Credit is used widely within, and to a lesser extent between, English HEIs. It is used to support academic planning and delivery, for the recording of individual student achievement, and to facilitate student progression, both into and within HE. There are an increasing number of local arrangements under which institutions and their partner organisations use credit to assist student progression, for example through the current developments of Lifelong Learning Networks (LLNs). Such initiatives linked to HE progression and widening participation strategies could be assisted by national credit arrangements, without compromising institutional autonomy.
10. It is anticipated that the development of national credit arrangements will provide a consistent basis for the application of credit. They will provide a 'common currency and framework' upon which HEIs can base the descriptions of study programmes they offer, and provide a shared reference point for making and explaining decisions about student transfers between

programmes and even institutions, more generally provide a more consistent basis for the use of APEL (accreditation of student's prior / experiential learning), and provide a national context for the development of local progression schemes.

11. HEIs are autonomous bodies with particular powers and responsibilities regarding the academic standards of their awards and the quality of the programmes of study that are offered. The development of national credit arrangements may lead to expectations about guarantees of transferability of credit between awarding bodies. The Steering Group is keen to emphasise that national credit arrangements will not affect the normal basis upon which academic judgements are made in respect of the award of HE qualifications. HE institutions, acting individually or in consortia however may wish to establish agreements and accords that will provide specific support for student progression.

Summary of responses to the first consultation

12. The Burgess Group credit consultation document set out a series of formal Proposals concerned with the basis upon which national credit arrangements for England could be established. These were essentially generic in nature and based on current widespread credit practice across much of HE. Consultation responses indicated that they are widely acceptable and they thus provide the basis of a proposed second, and final consultation, on national credit arrangements for HE in England.
13. The first credit consultation document also included a series of questions, the responses to which provide an overwhelmingly clear indication of the way in which that the substantial majority of respondents wish to see HE credit developed in England. In summary the responses indicate that national credit arrangements should:
 - be organised as a framework, that should include guidelines on the application of credit and provide indicative numbers for the main HE awards, but that these guidelines should not be, or be perceived as, prescriptive in any way
 - be integrated with the Framework for Higher Education Qualifications (for England, Wales and Northern Ireland)
 - be based on the credit arrangements currently predominant in HE across the UK (120 credits per normal full time equivalent undergraduate year; 180 credit per full time postgraduate year, and 1 credit per 10 notional hours of learning)
 - seek every opportunity to facilitate articulation with the European Credit and Accumulation Transfer System
 - include guidance and recommendations on the use of level descriptors; although with several comments that these must not be prescriptive, and that institutions should continue to be able to choose and use descriptors as they saw fit. A small minority indicated that recommendations on level descriptors were not required (the current FHEQ descriptors being sufficient)
 - identify the typical credit values for the main HE awards
 - as the minimum total credit associated with each of the awards; there were various views on whether this figure should be referred to as a 'typical' or 'normal' value

- where an award spans different levels of study, identify the volume of credit at the level of the award; although here the responses were heavily qualified with concerns about potential difficulties in practical implementation
 - include reference to the use of NICATS level descriptors; although responses also indicated that the FHEQ and European 'Dublin' qualification descriptors should remain as key reference points. Some concerns were expressed about the potential impact of current work (by QCA) on modifications to the NICATS descriptors to include greater emphasis on vocational elements, for their application with the proposed Framework for Achievement.
14. Respondents were invited to offer any further comments on the development of national credit arrangements. These were generally supportive but with most numerous references to:
- the importance of developing recommendations that are non-prescriptive and can assist institutions and students, without infringing the autonomy of the former
 - the particular and growing importance of European aspects, including the Framework for Qualifications of the European Higher Education Area (the Dublin descriptors), and ECTS
 - the importance of addressing issues related to compensation and condonation, and the award of credit; though also noting that these were particularly difficult topics to consider, even at 'local' and institutional levels.
16. The consultation paper included an Annex in which illustrative numbers were provided as potential credit values for the main HE awards. Where responses commented on these they were generally supportive, although with a few additional questions but also a number of helpful 'technical' suggestions.

Proposals for national credit arrangements for HE in England

Overall structure

17. The Burgess Scoping Group's subcommittee on credit proposed a typology of potential arrangements (a 'system', a 'framework', and a 'scheme'). The first consultation excluded a 'scheme' as appropriate at a national level, and responses indicate very high support for national credit arrangements to be organised in the form of a 'credit framework'. Some responses noted that the typology was perhaps 'counter-intuitive', and detailed analysis of consultation responses has sought to take particular care in understanding the full nature of the responses, rather than just the 'headline answers' to the question: *'Would national credit arrangements .. better be organised as .. a system or a framework ..?'*
18. Analysis of the responses indicates that respondents, whilst overwhelmingly in favour of a 'framework', never-the-less are keen that this should be presented in the form of (permissive) guidelines, and that these should be linked to the Framework for Higher Education Qualifications. Particular emphasis was made in many responses to the nature of the guidelines; they should not be, nor be perceived as, prescriptive. Responses noted that particular care would need to be taken to ensure that the guidelines did not become, in effect, *'.. another set of requirements ..'*

Recommendation 1: that national credit arrangements for HE in England are structured as a framework that is:

- **presented through (non-prescriptive) guidelines**
- **linked to the Framework for Higher Education Qualifications**

examples of consequences:

HEIs: a majority of HE institutions operate with credit arrangements within the overarching framework that these national guidelines will provide. For those institutions that do not use credit at present, and typically deliver the majority of their programmes as years of full time study, the guidelines provide a straightforward means of articulating information on the relative extent of their programmes to national norms.

Stakeholders including students will be provided with a straightforward and simple indicator of the extent of study normally associated with the award of the main HE qualifications. This benefit applies to all of the recommendations set out below.

19. One of the main aims of developing national credit arrangements for HE is to facilitate progression into and within HE. In keeping with this aim respondents to the first consultation were overwhelmingly supportive of Proposal 7 to change the nomenclature of the levels of the FHEQ so that they would align with the current National Qualifications Framework (for QCA-regulated qualifications), with the proposed Framework for Achievement, and with the Credit and Qualifications Framework for Wales.

Recommendation 2: that the current FHEQ levels C, I, H, M and D should be renumbered as levels 4, 5, 6, 7 and 8 respectively.

examples of consequences:

HEIs and stakeholders: the changes to level nomenclature will mean institutions revising documentation over a period of time, but will provide a single, simple system for all of those interested in progression within lifelong learning and into HE.

20. The FHEQ includes a series of qualification descriptors that provide a summary description of the main characteristics typical of the main award at each of the levels of the framework (including e.g. those graduating with honours, masters or doctoral degrees). Responses to Proposal 8 in the first consultation were strongly in favour of including, within the FHEQ, the equivalent qualification descriptors (the 'Dublin descriptors') of the recently adopted Framework for Qualifications of the European Higher Education Area. Again, respondents emphasised that these must be regarded as 'reference points' that can assist HE where relevant, rather than any notion that their use should be regarded as either 'required' or 'prescriptive'.

Recommendation 3: that the Dublin descriptors of the Framework for Qualifications of the European Higher Education Area be adopted as additional reference points to the FHEQ.

In making this recommendation the Group notes that, as with other reference points used in setting and describing academic standards, the extent to which they are used, or not, may be determined by each HEI acting autonomously.

examples of consequences:

HEIs and others: the addition of the Dublin descriptors (which set out generic expectations linked to the completion of each of the Bologna 'cycles') provides a recognised European dimension to the reference points that may be used by HEIs in establishing the standards of their awards.

Credit and periods of study

21. Despite significant changes in the patterns of study, higher education remains predominantly concerned with programmes that are designed at the outset as a coherent whole although these programmes have increasingly in recent years been delivered through modular or unitised arrangements. There remain however a significant proportion of students who study on a fulltime basis and on programmes that are not modularised. Irrespective of the style and pattern of study similar qualifications are expected to represent similar levels of successful endeavour. Credit can provide a means for such relative calibration. UK credit practice has converged on the use of 120 credits to represent the equivalent of a year of fulltime equivalent study (typically over 8 to 9 calendar months), with 180 credits for the typical postgraduate fulltime equivalent year, reflecting the additional weeks of study in such programmes. By contrast the European Credit Transfer and Accumulation System (ECTS) uses 60 credits per full time equivalent undergraduate year and (there are proposals for) 75 credits for the longer postgraduate study year.
22. Responses to the first Burgess consultation indicate that there is overwhelming support for the application, at national level, of the UK system of calibration (120/180 credits per fte year of study) rather than ECTS. Respondents noted however that any national arrangements and guidelines should seek as far as is possible to seek articulation with ECTS.

Recommendation 4: that a normal full time year of undergraduate study is represented by 120 credits, and a full time postgraduate year by 180 credits.

examples of consequences:

HEIs: this will accord with existing practice for the majority of HEIs in England that already use credit. For those that do not, the recommendation provides a straightforward and simple calculation to indicate the extent of study normally associated with the award of their main qualifications.

Recommendation 5: that the relevant bodies, lead by the 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.

Qualifications and credit: total credit values

23. It is widely accepted within UK HE credit practices that programmes and, where relevant, their modules/units can have an identified credit value. This credit value is expressed in terms of a number of credits (indicative of relative volume of learning/achievement) and their level (indicative of relative complexity /challenge associated with that learning).
24. Responses to the first consultation were strongly in favour of national arrangements including an identification of credit values of the main HE awards. Whilst there was agreement that these could be expressed as 'a minimum', there were contrasting views as to whether this should be expressed as being used 'typically' or 'normally'.

Recommendation 6: that the credit values indicated in Table 1 provide guidance on the credit normally associated with the main higher education awards in England

Qualifications and credit: credit at the level of the award

25. Most HE programmes, and in particular those taken over a number of (full time equivalent) years, represent a planned course of academic progression with learning at more than one level. Some credit arrangements reflect this by indicating both a total credit value for the whole award and the amount of credit in the final stage (typically the final year, but actually representing the 'level of the award'). Thus a Bachelors degree with honours would normally include a minimum of 3 years fulltime study (360 credits) with at least most if not all of the final year of study at the honours degree level. This would be expressed as: total 360 credits, with 120 credits at level H / level 6.
26. Some responses to the first consultation noted that, in addition to a total figure, guidance on the amount of credit at the level of an award would also be useful for both HEIs and particularly for students and other stakeholders, since it would indicate the extent of study normally associated with the level of the award. Others argued however that such guidance could constrain the planning of academic progression within a programme and the delivery of its elements, also that the Academic Infrastructure¹ provides sufficient national reference points to indicate the achievements required to meet the academic standards of HE awards. Particular examples included contrasting patterns of study within masters programmes; some programmes build upon students' detailed knowledge in a discipline, whilst others introduce students to new discipline areas but, building through graduate skills, achieve the demonstrable outcomes for a masters award within a similar period of study. On balance, and noting that that national guidelines should not be regarded as prescriptive, but be used within

¹ The Academic Infrastructure includes the following reference points to support the establishment and description of academic standards, and associated quality assurance: the Framework for HE Qualifications (with its qualification descriptors), the subject communities' benchmark statements, (guidelines on) institutions' programme specifications, and a Code of Practice.

each particular academic context, the Burgess Group concludes that guidance on the credit at the level of an award would be useful.

Recommendation 7: that national guidelines on credit provide an indication of expectations about the number of credits, within the overall total, normally associated with the level of the award.

Recommendation 8: that the numbers within Table 1 provide suitable guidance on the number of credits normally associated with the level of the award, for the main higher education awards in England.

Table 1: Guidance on the number of credits normally associated with the award of the main HE qualifications; including the number of credits normally required at the level of the qualification.

Main HE awards	FHEQ level [current/proposed: see para 19 above]	FTE period of study (normal) ¹	Normal total credit value ²	Credit normally at level of award ³
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) (does not represent end of Bologna 1 st cycle)	I / 5	2.5 to 3 years (u/g)	300	60
Bachelors degree with honours (BA/BSc hon) (represents end of Bologna 1 st cycle)	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	M / 7	4 months (p/g)	60	40
Postgraduate Diploma	M / 7	8 months (p/g)	120	90

¹ Full Time Equivalent (FTE) period of study is expressed as a minimum period assuming normal undergraduate or postgraduate term/semester lengths; the actual period of study may be longer or, rarely, shorter.

² The normal total credit value of each of the main HE qualifications is expressed as a minimum that does not include any allowance for compensation or condonation that institutions may permit. The credit values for particular qualifications may be greater (e.g. for a 4 year BA/BSc) but rarely smaller.

³ Many qualifications include some study at level(s) lower than that of the award. The figure for the credit normally at the level of the award is indicative of the amount of study within a programme that might normally be expected to be at the level of the award.

Masters degree (integrated) (e.g MEng; MChem; MPhys; MPharm) (from integrated 1 st and 2 nd cycle programme)	M / 7	4 years (u/g and p/g)	480	120
Masters degree (e.g. MA; MSc; MRes) (self-standing Bologna 2 nd cycle programme)	M / 7	1 year (p/g)	180	150
Doctorate (only where credit based) (e.g. EdD; DBA; DClin Psy) (Bologna 3 rd cycle)	D / 8	3 years (p/g)	540	360
PhD / DPhil	D / 8	3 years (p/g)	Not normally credit rated	-

Credit and programmes of study: information provided by institutions

27. Most responses to the first consultation agreed with the proposal that institutions should publish information on the credit values of their programmes /awards. There were several questions on how this might be done, stressing the need to provide comparable information about programmes in a consistent manner, to assist students and others. Numerous responses suggested that credit information should be provided through the programme specifications that institutions publish. Programme specifications are however not published in consistent and directly comparable forms. HEFCE and others, including UCAS, are currently considering how comparable information on programmes may best be provided. In making the following recommendation the Burgess group suggests that implementation of this should be considered within the wider context of TQI and UCAS information portals:

Recommendation 9: that institutions include the credit value in a published description of each of the programmes they offer.

Credit levels

28. Within some systems credit has an associated level; the level is 'an indicator of the relative demand, complexity, depth of learning and learner autonomy, derived from agreed generic level descriptors'. UK HEIs and consortia that utilise credit have undertaken long and detailed discussions about the form and detail of level descriptors associated with the establishment of credit levels. The EWNl credit survey indicates that whilst many members of the EWNl consortia use descriptors derived from the NICATS project (see below), there are a substantial number of institutions that have developed their own level descriptors. Some English HEIs however do not utilise level descriptors at all, but relate the standards of their awards to the existing reference points of the Academic Infrastructure (see footnote page 9). The European Credit Accumulation and Transfer System (ECTS) does not include credit

levels, rather the equivalent information is provided on the Diploma Supplement that indicates the 'level' of the module for which the credit was awarded.

29. Whilst responses to the first Burgess consultation on credit indicate general support for guidance on level descriptors such support was strongly tempered by views that such guidance should emphasise that level descriptors should be regarded as no more than general reference points; in particular their elements within level descriptors should NOT be regarded a basis for specific expectations or prescription.
30. There was general support amongst the response to the first Burgess consultation on credit for inclusion of reference to the NICATS descriptors within any national guidelines. The EWNi guidelines on credit, the (Welsh) CQFW, and many institutions base their own (variants on) descriptors on these. Several respondents proposed that the summary NICATS descriptors would provide a useful set of reference points at national level. Whilst this might be regarded by some as a retrospective approach it has the merit of aligning with the basis from which many institutions, and the credit consortia, have developed their own more detailed descriptors. These descriptors also provide the (historical) starting point for the descriptors that will be used within the proposed Framework for Achievement for vocational and other non-HE qualifications, and from which it is anticipated that there will be important progression through lifelong learning and into HE.

Recommendation 10: that the summary NICATS descriptors (see Annex I) are included within the guidelines of a national credit framework for HE in England

examples of consequences:

HEIs: this should provide a shared reference, familiar to those HEIs that have already developed credit systems, and one that could inform development for those institutions that wish to develop level descriptors.

Stakeholders including students will be provided with a straightforward and simple indicator of the extent of study normally associated with the award of the main HE qualifications.

The award of credit

31. Proposals drawing on the range of definitions already available were made in the first consultation regarding the award of credit. Consultation responses were generally favourable although with just a few suggestions for changes to wording. The guidelines will include definitions which reflect these comments and indicate that credit is awarded to a student in recognition of their achievement of identified learning outcomes, and that the award of credit recognises achievement of the required minimum learning outcomes of a programme or module/unit.

The accreditation of prior (experiential) learning

32. Several respondents suggested that national guidelines should make reference to the accreditation of prior (experiential) learning (APEL). Drawing upon extensive sector experience, the QAA has published Guidelines on the accreditation of prior learning (2004) that cover a wide range of approaches. The Guidelines are not a 'how to do it' manual; they are neither exhaustive nor prescriptive. Rather, they have been written at a fairly high level of generality and as such should be accessible to a range of readers, and as such are designed to increase the consideration and application of APL. It is anticipated that there will be considerable increase in such activity in the coming years and it is anticipated that such guidelines will be reviewed and if necessary updated and revised on a regular basis.

The accumulation of credit

33. It is widely accepted within UK HE credit practice that the award of credit, and the accumulation of credit towards qualifications, should be at the discretion of each awarding institution. Responses to the first consultation recognised and agreed with this, although a few suggested that greater detail might be introduced into national guidelines concerning general and specific credit and the relationships between credit, modules and qualifications. Noting the importance of institutional autonomy, the Burgess Group considers that its recommendations for national arrangements should be limited in scope to those matters it considers necessary and sufficient, and thus proposes the following:

Recommendation 11: 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.

Recommendation 12: that each HEI, in agreement with partner organisations where appropriate, determines what credit, offered by a student, it will accept for purposes of accumulation.

examples of consequences:

HEIs that use credit will have rules and regulations on the accumulation of credit, the completion of programmes, and award of their qualifications. The recommendation makes it clear national guidance would not seek to change the powers and responsibilities of HEIs. An institution may, of course, enter into agreements with others about any guarantees it is prepared to offer regarding its accumulation of credit (see also next section).

Credit transfer

34. Responses to the first consultation agreed with the proposal concerning credit transfer, and the Burgess Group thus makes the following recommendation:

Recommendation 13: that each HEI, in agreement with partner organisations where appropriate, determines what credit, offered by a student, it will accept for purposes of transfer.

examples of consequences:

HEIs and partner organisations are establishing Lifelong Learning Networks (LLNs) and similar partnerships. It is for their specific agreements, rather than national guidelines, to identify to what extent credit may be accumulated and/or transferred for either entry or award purposes.

Credit, academic standards and quality assurance

35. This paper does not deal with the processes used by institutions to arrive at summative academic judgements. It is for institutions working within their own rules and regulations to come to a conclusion about such matters. Institutions may decide that credit plays or does not play a part in the way they determine their academic awards. The proposed national arrangements are set out as guidelines; they must not be regarded as reflecting national requirements or placing any prescriptive obligations on institutions in respect of the discharge of their responsibilities for academic standards and quality.

Recommendation 14: that institutions' decision-making processes regarding academic standards and quality should remain properly and entirely the responsibility of each autonomous institution. The application of the national guidelines on credit should remain a matter for individual institutions to decide upon at their discretion.

examples of consequences:

HEIs will continue to be solely responsible for their own academic standards and quality, and will have absolute discretion to decide whether or not they use the credit guidelines within their processes and procedures.

Stakeholders, including students, should be made aware that credit and academic standards are not the same things.

36. Those institutions that utilise credit take different approaches to partial failure of components both within a module and within a programme. A survey (2004) by the EWN Credit bodies revealed widespread variations in practice within and between institutions with regard to compensation and/or condonation. A few institutions require that all stated learning outcomes of a module must be achieved and all modules must be passed for completion of a programme and the award of a qualification. Many institutions permit compensation for some failure within one part of the programme by use of evidence of success elsewhere, so that in effect all elements are considered to have been passed, whilst others take the view that where there is evidence of satisfactory achievement elsewhere, and so long as the learning outcome set at the programme level have been achieved, a failure in part may be condoned. Generally institutions have regulations that permit either compensation or condonation but not both; some work within an approach to an 'allowance for failure' that permits either compensation or condonation, under informed and regulated circumstances. Whilst a few

responses indicated the importance of providing national guidelines, to introduce some greater consistency to this area, the overwhelming number of comments noted that it would be unlikely, if not impossible, that a shared or common position could be found. Noting that HEIs are responsible for the standards of their awards, including the manner in which they may make some allowance for partial failure within an overall programme, the Burgess Group makes the following recommendation:

Recommendation 15: that matters relating to compensation for or condonation of failure remain at the specific discretion of each institution, and that institutions have clear and available information on how they reach decisions on these matters.

Further development

37. Following this consultation the Burgess Group anticipates making a set of final recommendations to the sector concerning the development of a framework and national guidelines for the use of credit in HE in England. It will look to the representative bodies (UniversitiesUK and the Standing Conference of Principals) to use these final recommendations in working with the sector, HEFCE, the Quality Assurance Agency and the Higher Education Academy, to provide the sector with advice that will support and encourage wider and consistent use of credit, particularly for the benefit of students and their ambitions in lifelong learning.
38. The Burgess Group does not expect its Recommendations to form the basis of any additional regulatory requirements either upon or within HEIs

The Consultation

The Burgess Group welcomes comments on the following Recommendations, which it makes having had regard to the existing and extensive experience of credit application with HE, and to the responses to its first consultation on the development of national credit arrangements for HE in England:

Recommendation 1: that national credit arrangements for HE in England are structured as a framework that is:

- **presented through (non-prescriptive) guidelines**
- **linked to the Framework for Higher Education Qualifications**

Recommendation 2: that the current FHEQ levels C, I, H, M and D should be renumbered as levels 4, 5, 6, 7 and 8 respectively.

Recommendation 3: that the Dublin descriptors of the Framework for Qualifications of the European Higher Education Area be adopted as additional reference points to the FHEQ.

Recommendation 4: that a normal full time year of undergraduate study is represented by 120 credits, and a full time postgraduate year by 180 credits.

Recommendation 5: that the relevant bodies, lead by the 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.

Recommendation 6: that the credit values indicated in Table 1 provide guidance on the credit normally associated with the main higher education awards in England

Recommendation 7: that national guidelines on credit provide an indication of expectations about the number of credits, within the overall total, normally associated with the level of the award.

Recommendation 8: that the numbers within Table 1 provide suitable guidance on the number of credits normally associated with the level of the award, for the main higher education awards in England.

Table 1

Main HE awards	FHEQ level [current/proposed: see para 19 above]	FTE period of study (normal)	Normal total credit value	Credit normally 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) (does not represent end of Bologna 1 st cycle)	I / 5	2.5 to 3 years (u/g)	300	60
Bachelors degree with honours (BA/BSc hon) (represents end of Bologna 1 st cycle)	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	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 1 st and 2 nd cycle programme)	M / 7	4 years (u/g and p/g)	480	120
Masters degree (e.g. MA; MSc; MRes) (self-standing Bologna 2 nd cycle programme)	M / 7	1 year (p/g)	180	150
Doctorate (only where credit based) (e.g. EdD; DBA; DClinPsy) (Bologna 3 rd cycle)	D / 8	3 years (p/g)	540	360
PhD / DPhil	D / 8	3 years (p/g)	Not normally credit rated	-

Recommendation 9: that institutions include the credit value in a published description of each of the programmes they offer.

Recommendation 10: that the summary NICATS descriptors (see annex I) are included within the guidelines of a national credit framework for HE in England

Recommendation 11: 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.

Recommendation 12: that each HEI, in agreement with partner organisations where appropriate, determines what credit, offered by a student, it will accept for purposes of accumulation.

Recommendation 13: that each HEI, in agreement with partner organisations where appropriate, determines what credit, offered by a student, it will accept for purposes of transfer.

Recommendation 14: that institutions' decision-making processes regarding academic standards and quality should remain properly and entirely the responsibility of each autonomous institution. The application of the national guidelines on credit should remain a matter for individual institutions to decide upon at their discretion.

Recommendation 15: that matters relating to compensation for or condonation of failure remain at the specific discretion of each institution, and that institutions have clear and available information on how they reach decisions on these matters.

Glossary

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	Life long learning networks
LSC	Learning and Skills Council
NICATS	Northern Ireland Credit Accumulation and Transfer Scheme
NQF	National Qualification Framework
QCA	Qualification and Curriculum Authority
SSDA	Sector Skills Development Agency

Summary NICATS descriptors

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; accepting full accountability for outcomes.

* Recommendation 2: that the current FHEQ levels C, I, H, M and D should be renumbered as levels 4, 5, 6, 7 and 8 respectively.

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, Queens University Belfast
Professor Patricia Broadfoot	Pro-Vice-Chancellor, University of Bristol
Dame Sandra Burslem	Vice-Chancellor, Manchester Metropolitan University
Mr Jim Crewdson	Principal, Wigan and Leigh College
Professor Hadyn Ellis	Deputy Vice-Chancellor, Cardiff University
Ms Hannah Essex (succeeded by Mr Julian Nicholds)	Vice-President Education, National Union of Students
Mr Carl Gilleard	Chief Executive, Association of Graduate Recruiters
Mr Gerard Madill	Policy Adviser, Universities Scotland
Professor Donald Pennington	Pro-Vice-Chancellor, University of Coventry
Professor Paul Ramsden	Chief Executive, Higher Education Academy
Dr Muriel Robinson	Principal, Bishop Grosseteste College
Professor Alasdair Smith	Vice-Chancellor, University of Sussex
Ms 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
Mr Peter Williams	Chief Executive, Quality Assurance Agency
Professor Michael Worton	Vice-Provost, University College London

Observers :

Dr Liz Beaty	Director, Learning and Teaching HEFCE
Mr Graeme Rosenberg	Senior Policy Adviser, HEFCE
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Ms Karen Jones	Senior Learning and Teaching Manager, HEFCW

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