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TRANSNATIONAL QUALIFICATIONS FRAMEWORKS

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PREFACE

Reforming national qualifications systems is at the top of the reform agenda of many of the ETF's partner countries, EU member states and beyond. These countries are using national qualifications frameworks (NQFs) as a policy tool for reform. In this context, the ETF is advising and assisting more than 20 countries around Europe on the reform of their qualifications systems, in particular in the wider context of vocational education and training (VET) reform. However, reform of national qualifications systems cannot be pursued in isolation, but instead should be part of the wider reforms of a country's education and training systems.

It is also significant that national developments are both paralleled and supported by the emergence of regional frameworks that aim at improving transparency and facilitating recognition of qualifications between countries. Recognition of qualifications is at the crossroads as new challenges appear on the horizon. First and the most important is the mobility of people and jobs in an increasingly globalised labour market. Recognition of qualifications plays a crucial role in promoting mobility, social inclusion and lifelong learning. It also reflects the aspirations of people for a successful integration in national and international labour markets. In addition, economic growth is grounded in a new paradigm that emphasises the central role of human capital. These developments will generate demand for new forms/schemes of recognition, more flexible routes to qualifications and stronger expectations from individuals, companies and societies.

What are 'transnational qualifications frameworks'? What does cross-border recognition of qualifications imply? What is the difference between comparability and equivalence? These are key concepts and questions that this report addresses. More fundamentally, the report examines emerging regional qualifications frameworks and their implementation strategies. Although it is premature to evaluate their impact, the reports looks also at the extent to which regional qualifications frameworks are able to achieve the various desired policy objectives associated with them particularly regarding mobility of labour and recognition of qualifications. Finally, the report examines the interplay between regional and national frameworks. The report traces, in a comparative approach, the short history of the regional qualifications frameworks to identify promising developments for the future.

As the most significant developments in the field to date originate in the European Union, the report therefore starts with a background case analysis of the European Qualifications Framework. At the same time, there are important transnational qualifications framework initiatives underway elsewhere. Europe alone is not necessarily the yardstick for transnational frameworks and there are other international developments worth examining. The report looks at four additional case studies of regional/transnational qualifications frameworks in other parts of the world: (i) a regional qualifications framework in the Southern African Development Community; (ii) a transnational qualifications framework for the Virtual University of Small States in the Commonwealth; (iii) a sectoral qualifications framework being developed by the Caribbean Community for the technical and vocational education and training sector in the Caribbean; and (iv) an emerging regional qualifications framework for the mutual recognition of qualifications overseen by the Association of Southeast Asian Nations. These five case studies were selected as being representative of a variety of regions and forms of transnational qualifications frameworks. They are not only initiatives for developing transnational qualifications frameworks in the world.

This report highlights the huge diversity not only across the five case studies, but also between the member states within each. Considering the findings as presented within each of the sub-sections, it is evident that there is no single recipe for successful development of a transnational qualifications framework within these diverse conditions. Some broad overarching factors that have a direct influence on the development and implementation of transnational qualifications frameworks have, however, been identified and are presented in the report.

The report addresses a number of key issues. First, there is the issue of the extent to which transnational qualifications frameworks can contribute to the increased recognition of qualifications internationally. The reader will see that great expectations of increased recognition exist across the five case studies, but evidence at the level of employers and individuals to support such claims remain very limited for the time being while these frameworks are still either being developed or are in the process of being tested and implemented. But while proof of increased recognition may be lacking at the moment, there is evidence that qualifications frameworks in general are influencing existing recognition methodologies through an increased focus on demonstrable competence, transparency, currency and portability.

Second, how far does the stage of development of individual NQFs within a transnational qualifications framework determine the overall progress of the transnational framework? A transnational qualifications framework that is developed on the basis of mature NQFs may be able to build on established and tested principles of the individual NQFs, but may also have to deal with existing differences between them. The study seems to indicate that the development of a transnational framework does not depend on the complete implementation of the NQFs that are part

of the transnational qualifications framework although inclusion of one or more further developed NQFs (often first generation) may have a significant positive impact.

Third, how are national and transactional developments influencing each other, that is, how does the development of a national framework influence a regional framework and vice versa? What the study seems to show is that the two processes, NQF development and the transnational qualifications framework development should preferably happen simultaneously as the interplay between the processes is valuable in both directions. The interplay between NQFs and transnational qualifications frameworks exists on a number of levels, and influences both the NQFs and the transnational qualifications frameworks is challenged.

The preparation of this report has benefitted from the support and invaluable inputs of a network of key stakeholders, scholars, practitioners and experts across the globe. It should be seen as a first contribution to the global debate on regional qualifications frameworks. Further development and strengthening of our understanding of this new phenomenon are obviously needed and should be pursued by bringing forward the process of analysis and cooperation with other national and international organisations. While the exact configurations of regional frameworks will not be the same for each region, all regions, irrespective of their initial conditions, will require combination of quality assurance measures and 'zones of mutual trust', as well as measures for capacity building, peer-learning and knowledge sharing.

It is our hope that this report will serve as an effective input to future developments. The ETF looks forward to continuing working with partner countries and other international partners in supporting transparency, building trust and contributing to enhanced international cooperation in learning for life.

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INTRODUCTION

A qualifications framework is an instrument for the development and classification of qualifications, which relates and compares qualifications using a hierarchy of levels of learning outcomes, usually of increasing complexity as a learner progresses up the levels. There are different typologies of qualifications frameworks. The scope of frameworks may be comprehensive of all learning achievement and pathways or may be confined to a particular subsector of the education and training system – for example, initial education, adult education and training or an occupational area. Some frameworks may have more features or dimensions e.g. credit or quality assurance criteria and a tighter structure, that is they are more prescriptive. All qualifications frameworks, however, establish a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country and internationally (adapted from OECD, 2007). The framework should ensure that people can do more with their qualifications. This may imply that the qualifications need to be reformed, but not necessarily.

However, it should be added that qualifications frameworks in practice are usually more than a grid of qualifications levels, instead they typically have wider 'political' and social aims and dimensions, such as seeking to integrate existing systems of education and training more closely.

Across the world, we have identified 126 countries[1] that now seem to be at some stage of introducing an NQF. These countries are to be found in all regions of the world, and range from the most industrially and economically developed in Europe to fast-developing countries in Asia and developing countries in Africa and Latin America. Increasingly, these national initiatives are being overtaken by cross-border attempts to recognise qualifications, notably the introduction of regional qualifications framework in Europe, the Caribbean and Southern Africa, a transnational qualifications framework in the Commonwealth, and various sector-specific initiatives such as in the hospitality sector in South East Asia, or the marketing sector in Europe.

The international dimension of qualifications frameworks has not been, to date, investigated in a comprehensive and comparative manner beyond the regions and countries in which developments are taking place. Given that qualifications frameworks are such recent phenomena, it is not possible to draw definitive conclusions about advantages and disadvantages of the characteristics and design of different types of framework or their wider impact. However, they appear to be significant initiatives that are embedded in wider regional and global political and economic integration processes. Qualifications frameworks that are being developed across countries and regions highlight, among other things, a gradual shift from bilateral recognition of qualifications to multilateral recognition (ILO, 2007a) and are considered also to have a 'push' dimension for developing NQFs.

To support the international debate on qualifications systems the European Training Foundation (ETF) has conducted this study on international experience in using and/or developing transnational qualifications frameworks across regions and countries. In the study 'transnational qualifications framework' is used as an overarching term to describe the various forms whereby cross-border recognition of qualifications is taking place through qualifications frameworks. The specific purposes of the study are twofold: firstly, to explore the potential influence of regional qualifications frameworks on the recognition of qualifications nationally and internationally; and secondly, to consider the wider interplay between national and transnational qualifications frameworks.

The overarching questions for the study are:

■ What models of regional qualifications frameworks and what implementation strategies and approaches are under development?
■ To what extent are regional qualifications frameworks able to achieve the various desired policy objectives associated with them particularly regarding mobility of labour and recognition of qualifications?
■ To what extent are regional frameworks influencing the development of NQFs?

The research activity on which this report is based took place over a four-month period between October 2009 and January 2010. The research includes a background case study of the European regional qualifications framework (which spans 31 countries), and four additional case studies of transnational qualifications frameworks in other parts of the world:

■ a regional qualifications framework in the Southern African Development Community (15 countries);
■ a transnational qualifications framework for the Virtual University of Small States in the Commonwealth

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1 Albania, Angola, Antigua and Barbuda, Argentina, Armenia, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belarus, Belgium, Belize, Bosnia and Herzegovina, Botswana, Brazil, Brunei Darussalam, Bulgaria, Cambodia, Canada, Chile, Colombia, Comoros, Croatia, Cyprus, Czech Republic, Democratic Republic of the Congo, Denmark, Dominica, Egypt, Eritrea, Estonia, Ethiopia, Finland, the former Yugoslav Republic of Macedonia, France, Gambia, Georgia, Germany, Ghana, Greece, Grenada, Guyana, Haiti, Hong Kong, Hungary, Iceland, India, Indonesia, Ireland, Italy, Jamaica, Jordan, Kazakhstan, Kiribati, Korea, Kosovo (under UNSCR 1244/1999), Kuwait, Kyrgyzstan, Lao People's Democratic Republic, Latvia, Lebanon, Lesotho, Lithuania, Luxembourg, Madagascar, Malawi, Malaysia, Maldives, Malta, Mauritius, Mexico, Republic of Moldova, Mongolia, Montenegro, Montserrat, Morocco, Mozambique, Myanmar, Namibia, Nepal, Netherlands, New Zealand, Norway, Oman, Pakistan, Papua New Guinea, Philippines, Poland, Portugal, Romania, Russian Federation, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Serbia, Seychelles, Sierra Leone, Singapore, Slovakia, Slovenia, South Africa, Spain, Suriname, Swaziland, Sweden, Switzerland, Tajikistan, United Republic of Tanzania, Thailand, Timor-Leste, Tonga, Trinidad and Tobago, Tunisia, Turkey, Tuvalu, Uganda, Ukraine, United Arab Emirates, United Kingdom, Vanuatu, Vietnam, Zambia, Zimbabwe.

being developed by the Commonwealth of Learning (31 countries);

■ a sectoral qualifications framework being developed by the Caribbean Community for the technical and vocational education and training sector in the Caribbean (15 countries);

■ an emerging regional qualifications framework for the mutual recognition of qualifications overseen by the Association of Southeast Asian Nations (10 countries).

The study starts, after an introduction of the research methodology and the scope of the work, with stocktaking and critical analysis of five cases of transnational qualifications frameworks development. It gives an overview of each of the case studies based on the literature review and interviews and looks at rationale and objectives, recent progress in implementation, policy and technical issues and in general the dynamic interplay between regional and national developments. The third part is a comparative analysis that emphasises common purposes and highlights differences among the transnational frameworks, for example regarding their governance, regulatory role, referencing processes, the development of transnational standards, and the different

levels of recognition (e.g. regional, sectoral or between countries that are not in the same geographical proximity). It also attempts to identify cross-cutting issues from the case studies. The fourth and final part of the study looks forward, as the developing links between national and transnational qualifications frameworks are explored in the context of increased international migration, the opening of global labour markets and the emergence of cross-border providers of education and training. These four components have framed the research design which is discussed in more detail in Chapter 2 of the report.

The findings of the report are based on a review of available literature related to each of the five case studies, as well as an analysis of targeted interviews that were conducted with individuals involved in each. Within the limitations of the study as a short-term exploratory research project the intention was not to attempt comprehensive sampling, but rather to identify key individuals involved at various levels of each case study, including development agencies, researchers, regional education providers, regional agencies, technical/advisory committees and national qualifications agencies and/or ministries.

1. CONCEPTUAL FRAMEWORK

1.1 THE ORIGINS OF NATIONAL QUALIFICATIONS FRAMEWORKS

In its broadest sense, the concept of qualifications can probably be traced back to the increased organisation of education in ancient civilisations. At first, formal education consisted primarily of study and interpretation of religion, and related philosophical, moral and ethical issues, but increasingly expanded to the study of what we would consider academic disciplines, or of learning of craft skills. Universities, beginning with Bologna in 1088, and then shortly afterwards, Paris and Oxford, began to be established, and the term 'qualification' started to acquire a more definite meaning. By the end of the 19th century the increased need for skilled manpower resulted in a move towards increased credentialism (expressed through formal qualifications) and later on, also an emphasis on human capital theory and technological development. With increased demand for trans-disciplinary and multi-skilled workers in the globalised environment at the end of the 20th century, the formal education system was viewed as limited and complicit in sustaining educational and social inequalities (Higgs & Keevy, 2009).

It is at this juncture that the search for a more visionary or progressive approach to education and training led to the idea of a national qualifications framework (NQF). Strong influences at the time included a call for the removal of the strong academic and vocational divisions between school and non-school knowledge (Mukora, 2007) and a move towards a competency-based vocational training model that advocated that 'qualifications could (and should) be expressed in terms of outcomes without prescribing learning pathway or programme' (Young, 2005, p. 5). As noted by Young, the attempt to shift control of vocational education from providers of education and training (criticised for being unable to meet the new demands) to employers (who, it was argued, were better placed to break down the barriers between academic and vocational systems) was also a significant influence on the thinking in the United Kingdom at the time. As the Scottish emphasis on lifelong learning through an outcomes-based approach emerged in the early 1990s, the foundation was laid for a new approach that would be able to recognise different forms of learning independent of the where and how such learning took place. Frameworks were seen as a way of facilitating more flexible routes to qualifications. Australia was one of the first countries to 'systematise' the emerging model from the United Kingdom into an NQF, but this was soon followed by England, Scotland, New Zealand and Ireland, and a few years later, also South Africa. France also has a lengthy tradition extending back to the 1970s. The most recent development in France, was the development of a

comprehensive system of validation of prior learning and the set-up of the National Commission of Professional Qualifications and a qualifications register. These six countries constituted the first generation of NQFs and were subsequently followed by many countries across the globe.

The first frameworks were very much a response to national contexts with the basic idea being to connect qualifications from separate qualifications systems within a country e.g. connecting initial vocational qualifications and sectoral qualifications and improve the transparency of qualifications. This was done in very different ways, varying from a radical redesign of qualifications driven by a central public entity to more evolutionary approaches building the connections on what was there already. As different systems were being linked up through the frameworks, the role of stakeholders has played a very crucial role in the development of all frameworks. Design features, stakeholder participation and consequently institutional set-up characterise different qualifications frameworks. The 'stronger' reform-oriented models, such as in South Africa, tried to use the framework to enforce stronger linkages between qualifications and often met strong objections from stakeholders with limited interest in such linkages.

By the end of 2009 more than 100 'second and third generation' NQFs were being developed, while all six first generation NQFs were still in place, but usually with some modifications. Over a period spanning more than 20 years extensive literature on the promises and problems of NQFs had accumulated and integrated into several spheres of research into education, training, work and learning. Most recently the International Labour Organisation (ILO), in collaboration with the ETF, initiated an international study on the impact of NQFs which was completed in 2010. The notion that NQF development is taking place in a theoretical void and with a lack of empirical evidence is increasingly being challenged:

> 'Qualifications frameworks are not a passing fad, nor do they present the only viable solution in the absence of anything more coherent and feasible. The challenge now is to ensure that qualifications framework implementation takes place with the necessary critical reflection, with modesty, and with ongoing attempts to improve understanding of a phenomenon that is truly global.' (McBride & Keevy, 2010, p. 17)

1.2 THE RECOGNITION OF QUALIFICATIONS

Qualifications frameworks can be used as a tool to support different policy goals, including the reform of

qualifications and qualifications systems, improving relevance, transparency and the coherence between qualifications or promoting lifelong learning objectives such as access, progress and the transfer of learning and opening up new pathways. In this study we focus on the international dimension of qualifications frameworks, which is predominantly linked with recognition.

Before beginning the analysis, it is useful to identify what is meant by the terms 'recognition' and 'qualification' in this report. Qualifications have traditionally been deeply embedded in specific social and economic contexts and institutional settings. While still very important, the specific national character of qualifications has been challenged by the internationalisation/globalisation of labour markets and by the increasing mobility of populations. This is gradually impacting on the way countries define, award and recognise qualifications and adds to the strategic and complex character of qualifications: they not only define the knowledge, skills and competences or any other kind of learning outcomes held by an individual, they also take the form of a currency signaling their value both nationally and internationally. Qualifications are awarded to people and are therefore their property. Once a competent body decides that an individual has learnt knowledge and skills to a specified standard, qualifications are awarded – usually as certificates, diplomas or degrees (Cedefop, 2008).

The concept of recognition is more problematic because it is often thought of in several ways, often at the same time. Based on the work of the OECD (2007) and the ILO (2007c), Leney (2009) provides a multi-dimensional definition which is helpful. Firstly, the skills that a person has gained should be easily recognisable (legible or transparent) to the users of qualifications. Users are mainly education providers, employers and of course the person who has achieved the qualification. Secondly, qualifications should be recognised as having a real value, for example for entry into the labour market or for academic or professional progression (currency). Thirdly, qualifications should be used and trusted when a person changes job or decides to migrate to a different area or country (portability). Thus, according to Leney, recognition refers to the transparency, currency and portability of qualifications.

The issue of portability of skills and recognition of qualifications is highly important across the globe. For

example, the OECD insights on international migration (2009) notes that 'over-qualification' (i.e. migrants tend to do jobs for which they are over-qualified) is a common phenomena. The report underlines the fact that while on paper immigrants' qualifications appear to have the same

value as locals', in reality the learning and skills they represent aren't equivalent; many employers are suspicious of qualifications earned in another country. They may doubt that the qualification actually exists or may not rate them as equivalent to ones awarded locally (OECD, 2009, pp. 98-101). At the same time the report of the Global Commission on International Migration (2005) underlines the paramount importance of valuing the skills of migrants as a basis for migrants to realise their potential and as a condition for making a better contribution to the prosperity of destination countries.

The ILO paper on portability of skills reviews and analyses policies to promote the transferability and recognition of skills in the context of the Global Employment Agenda. In an examination of how countries recognise the skills and qualifications of individuals leaving or arriving to study or work, the report considers three types of recognition (ILO, 2007c, pp. 12-13). These can be described as follows.

- *Unilateral recognition.* It has been the most common form of assessing migrant workers' skills and competences. Here a country of inward labour market migration decides on its own which skills and qualifications it will recognise. Many recognition schemes have public policy objectives like ensuring quality and standards of services and protecting consumer and national interests.
- *Mutual recognition agreements (MRAs).* These are formally agreed between sending and receiving countries and they focus on reciprocal recognition of certifications and competences of migrant workers. A wide range of MRAs exists, mainly in the area of regulated professions. According to the ILO, negotiating an MRA tends to be a difficult process, in particular where regulations, levels of development, education systems, standards of training, ethics and practice differ substantially between countries.
- *Trade/regional agreements.* These are multilateral recognition agreements, as in regional arrangements such as those developing between European countries through the European Qualifications Framework (EQF).

While it is helpful to analyse types and examples of recognition arrangements, it remains true that there are many people who migrate in international labour markets for whom no procedures for recognising their skills and qualifications exist. At present unilateral recognition is the most common mechanism for recognition of migrants' qualifications. The ILO makes the point forcibly that unilateral skills recognition carries strong disadvantages, while the report of the Global Commission on International Migration calls the states to 'enter into agreements with regard to the mutual recognition of qualifications, so as to ensure that migrants are able to practice the skills they have gained in their own country' (GCIM, 2005, p. 47).

In more recent years national and transnational qualifications frameworks have come to present new forms of recognition that in many ways challenge the existing dominant models, such as the unilateral, MRA and even the more recent multilateral agreements.
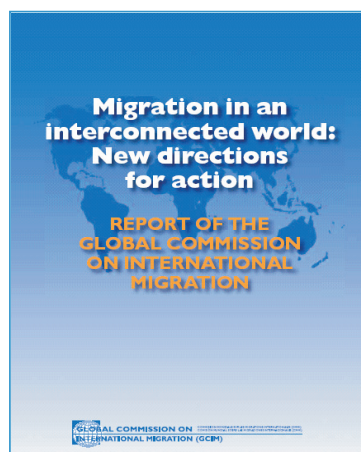
WHAT IS NEW ABOUT QUALIFICATIONS FRAMEWORKS?

What is new about the modern NQF is the interest of governments in developing overarching (comprehensive) frameworks that incorporate qualifications from different education and training sectors (general, vocational and academic). The new frameworks are thus often linked to lifelong learning strategies and are also in many cases open to the learning taking place outside formal education and training, at work and in past-time. Modern NQFs potentially go beyond the role of classifiers ('qualification grids') and aim at redefining the way qualifications are related to each other, how they are valued and eventually put into use in our societies. Modern NQFs can thus be described as 'instruments with a vision' questioning current education and training practices and challenging existing professional and sectoral interests. Designing an NQF is thus something more than agreeing on a set of technical features (NQF understood as a grid of levels and descriptors), it is about creating a platform for (cross-institutional and cross-sectoral) dialogue and – eventually – mutual trust.

Source: Bjornavold & Coles, 'The added value of national qualifications frameworks in implementing the EQF', 2009

Through qualifications frameworks the increased transparency, currency and portability of qualifications, as noted by Leney (2009), is being pursued not only on a national basis, but also transnationally. As will be discussed later in this report, it is apparent that the prior existence of agreements, be they unilateral, MRAs or multilateral, form an important basis for qualifications framework development on a transnational level.

1.3 THE CONCEPT OF A TRANSNATIONAL QUALIFICATIONS FRAMEWORK

During the early years of the 21st century the increased development and implementation of NQFs acted as a catalyst for more countries to follow suit, often in geographical proximity to countries with more developed NQFs. At this stage the possibilities of developing qualifications frameworks beyond the limitations of specific countries became obvious and the idea of a 'regional qualifications framework' emerged. It is difficult to determine the first region that actively pursued the idea of a regional qualifications framework, but official documentation from the Southern African Development Community (SADC) refers to a qualifications framework for SADC as early as 2001 located within the broader regional and African contexts of the SADC Protocol on Education and Training (1997) and the Arusha Convention (1982). A SADCQF concept document was released in 2005. In the European Union (EU) the Bologna process (1999), the Lisbon Strategy (2000) and the subsequent Copenhagen process (2002) provided the context for the EQF for which a consultation document was released in 2005. In the Caribbean Community (CARICOM) the drive for a regional single market and economy has led to the development of Caribbean Vocational Qualifications (CVQs), while the establishment of a regional coordinating mechanism in 2003 was an important factor in the decision to develop a CARICOM qualifications framework TVET. More recently, in 2007, the Commonwealth of Learning facilitated the development of a transnational qualifications framework for 29 small states (populations of less than 1 million) located across the globe and members of the Commonwealth.

Considering the examples mentioned above, the concept of a transnational qualifications framework is interpreted in its widest sense in this study so as to include different forms of recognition and classification of qualifications across groupings of countries; in this regard the abovementioned initiative by the Commonwealth of Learning is the most radical example with 32 countries spread across five continents. Other variations of transnational qualifications frameworks include:

- regional qualifications frameworks, i.e. recognition of qualifications across countries that are in geographical proximity, often, but not necessarily organised within a regional association or body – examples include the EQF and the SADCQF;
- international sectoral qualifications frameworks, i.e. recognition of qualifications across countries within or beyond the same region, but limited to a specific sector – here the CARICOM TVET qualifications framework is a good example.

In an attempt to further define a transnational qualifications framework, a useful point of departure is the various interpretations of NQFs (see for example Coles, 2007; and OECD, 2007) which suggest a transnational framework is an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved between countries. Importantly though, and this differs from most NQFs, transnational qualifications frameworks usually (i) have less regulatory and more communicative purposes; (ii) include a wide range of sectors of education and training, if not all; (iii) have a range of national and regional policies, accords, conventions and protocols supporting them, but are not underpinned by enforceable legislation; and (iv) have limited, often voluntary, institutional arrangements for governance and management.

Just as with NQFs, transnational qualifications frameworks are also associated with key challenges and promises. As a result of the more recent occurrence of the regional qualifications frameworks, these problems are less documented, yet it cannot be disputed that they exist. The introduction of the term 'meta-framework', specifically in the context of the European regional qualifications framework i.e. the EQF (European Commission, 2005), is important as it offers an example of how some of the challenges of transnational

qualifications frameworks are being addressed. It is evident that the loose, communicative and consultative configuration, based on common criteria represented by the meta-framework idea, offers a more pragmatic mechanism to achieve regional objectives. In particular, the meta-framework concept has in many ways attempted to avoid many of the key problems and issues associated with NQFs: the purpose is clearly defined and understood; the real benefits to all sectors are more clearly identifiable; differences between different types of education and training are accommodated; financial and human resources may be more accessible; communities of trust are developed; governance is made possible through regional representation; and the design of the framework is flexible and pragmatic. Of course many of the potential benefits of transnational qualifications frameworks, including those developed as meta-frameworks, remain to be tested in practice. A key focus of this study has been to initiate such an exploration in an area that to date has been under-researched.

One of the key purposes of transnational qualifications frameworks is communicative and attempts to find commonalities between countries. Some NQFs, on the other hand, often have a very strong transformative purpose that requires a much more regulatory approach. Literature however shows that using NQFs as instruments of change will necessarily lead to a range of

problems (see Raffe, 2009), though, in most such cases, the problems are viewed as a small price to pay for the transformation advantages gained in the process. The notion of using a transnational qualifications framework, whether a meta-framework or not as an instrument of change, may prove to be very difficult as these are loose frameworks with limited ability to affect change, at least in the short term. In this regard it is also important to note that unified frameworks, however loosely arranged, are seldom truly unified as they tend to be characterised by internal differences. The agendas of different countries differ considerably, since being on different levels of development, particularly with qualification structures, will advantage some and disadvantage others (Ibid.).

FIGURE 1.1 provides an overview of the three main types of qualifications frameworks discussed thus far: those within specific sectors within a country, those that are national, and those that exist across different countries. The diagram is not intended to be exhaustive, but does illustrate the key differences between these frameworks.

Another way of categorising these transnational qualifications frameworks has been suggested by David Raffe (correspondence with authors, July 2010), distinguishing between (i) meta-frameworks as 'frameworks of frameworks' without their own qualifications; and (ii) transnational qualifications

FIGURE 1.1 **DIFFERENT TYPES OF QUALIFICATIONS FRAMEWORKS**

Sectoral frameworks occur on all three levels and can be based on a variety of sectors e.g. general education, VET, higher education, marketing, food security, etc.
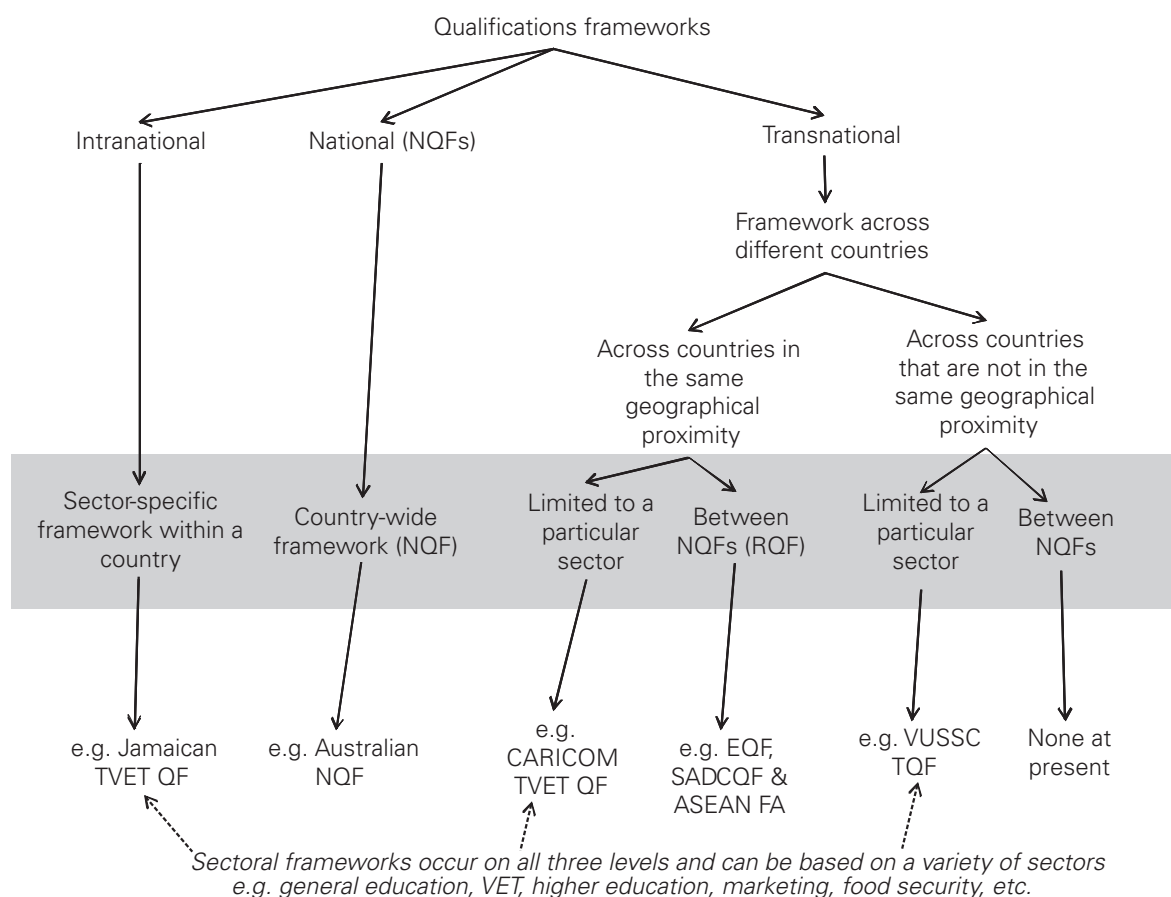
frameworks where a set of common qualifications are shared between different countries (transnational frameworks of common qualifications). The EQF would then be an example of the first type, while the Caribbean Vocational Qualifications Framework would be of the second type.

1.4 STAGES OF TRANSNATIONAL QUALIFICATIONS FRAMEWORK DEVELOPMENT

Transnational qualifications frameworks, just as is the case for NQFs, can be categorised according to various stages of development. While such a categorisation is always subjective and a simplification of reality, the categorisation does at least offer a lens through which to compare different transnational qualifications frameworks

with each other. The following categorisation of the stages of transnational qualifications framework development has been adapted from Deij (2009) which was initially developed for NQFs. Importantly the stages are not presented as mutually exclusive as it may be possible that a transnational qualifications framework can be at more than one stage at the same time.

1.5 THE RELATIONSHIP BETWEEN TRANSNATIONAL AND NATIONAL QUALIFICATIONS FRAMEWORKS

The development of NQFs in countries within a specific region, or grouping of countries, is closely interrelated with the development of transnational qualifications

STAGES OF TRANSNATIONAL QUALIFICATIONS FRAMEWORK DEVELOPMENT

Stage	Description	Types of evidence
Exploration/ orientation	Growing awareness and interest in a transnational qualifications framework at regional level	Inclusion of the vision of a transnational qualifications framework in regional/international documents (such as strategic plans)
	Understanding of the value of a transnational qualifications framework for cross-border provisioning	
	Discussions on a transnational qualifications framework in regional forums	
Conceptual	Decision in principle in favour of a transnational qualifications framework	Transnational qualifications framework concept and discussion document(s) developed
	Expectations discussed	
	Focus is on legislation and/or regional consensus	Regional/international steering group/committee established
	Roles of key stakeholders	
	Resourcing	
	Compromises take place	
Testing	Pilot projects initiated (often sector-specific)	Sectoral projects
	Some qualifications registered on the transnational qualifications framework	Initial qualifications registered on transnational qualifications framework
Implementation	Regional/international body responsible to oversee the transnational qualifications framework established (or identified if it is an existing body)	Regional/international body
		Legislation
		Funding
	Regional legislation/policy/protocol finalised/agreed	
	Regional funding secured	
Review	Re-conceptualisation	Formal review process
	Review of impact and progress	Review report
	Re-design	

frameworks. This mutual interdependence differs from one case to the next, and undoubtedly constitutes an important aspect that cannot be ignored in a study on transnational qualifications frameworks. This applies in particular to countries that are part of a developing meta-framework, but also in countries that are part of a transnational framework of common qualifications (following Raffe's proposed delineation) as the example of Jamaica shows. While in theory it may be possible for a country without an NQF to link to a transnational framework, evidence seems to suggest that this is unlikely, and where it may happen, results in a strong impetus for the country to start developing an NQF. Even small states with limited resources have been able to successfully develop modest NQFs (such as has been the case in the Seychelles with a population of only 80,000). In some cases the preference has been for NQF development to be prioritised in member states, so that the transnational qualifications framework can only be developed once member states are at an equal footing with regard to NQFs.

In order to describe these varied relationships between a specific transnational qualifications framework and the NQFs that relate to it, the following three broad categories are suggested. As emphasised in the previous section, this categorisation is only used in an indicative manner, and is more fully described within the specific case studies.

Prioritisation of NQF development

In this case, NQF development in member states is prioritised. Transnational qualifications framework development may be agreed to by countries, but is delayed to allow member states to first 'get their own house in order'. The advantage of this approach is that the emphasis remains on the member states, and in so doing, allows countries that are at earlier stages of development (in some cases even only in the orientation stage) to participate in the transnational process on a more equal footing. The disadvantage, as noted above, is that the development of the transnational qualifications framework is delayed indeterminately as less developed countries struggle to develop their NQFs.

Prioritisation of transnational qualifications framework development

In cases where the development of the transnational qualifications framework is prioritised, two scenarios exist: (i) few member states have NQFs and the transnational qualifications framework acts as a catalyst for NQF development; or (ii) most member states already have NQFs, and the transnational qualifications framework is seen as the logical next step. The main advantage for prioritising the transnational qualifications framework is that development and implementation can take place much more quickly and is not held back by member states that have yet to develop NQFs. On the other hand, the less developed member states may find it

increasingly difficult to be part of the transnational process, as they become more and more isolated.

Parallel development of the transnational qualifications framework and NQFs

This approach appears to be the most successful and allows for a multipronged strategy that involves a coherent and systematic approach to capacity building in member states, while the transnational framework development takes place. Significant resources are required for this approach, and ideally involve a number of different agencies that operate across the member states. The direct involvement of member states in the transnational process (e.g. through representation on committees and working groups) is also a necessary precondition. Homogeneity amongst the member states is however not a precondition, although there can be a degree of peer pressure to speed up NQF developments. The existence of strong NQFs (mostly first generation) that predate the transnational qualifications framework is an advantage.

1.6 REFERENCING OF QUALIFICATIONS FRAMEWORKS

Another important dimension of the relationship between different qualifications frameworks is referencing. This referencing process involves a comparison between two qualifications frameworks in order to improve the correlation between the two frameworks in terms of levels, credits and qualifications types. At present referencing is done mainly between NQFs and transnational qualifications frameworks, and is limited to the European context. Examples include referencing between the qualifications frameworks of the UK to the EQF (QF, 2009; see also Hart, 2008); the Maltese NQF and the EQF (MQC, 2009); and the Irish National Framework of Qualifications and the EQF (NQAI, 2009). While this is the dominant model at present, NQFs have also been referenced against each other in the past (e.g. South Africa and Australia, the United Kingdom and Ireland).

The referencing of qualifications frameworks represents a critically important point of development as it entails practical application of models that up to that point may have remained abstract and amorphous. It is here that the strengths and weaknesses of the frameworks become more obvious, it is also here that the development of trust between countries and regions is solidified. It is for this reason that referencing should be understood beyond a simple technical exercise of matching levels, credits and qualification types, to a process wherein different stakeholders are able to participate in a social process that allows for objective and external scrutiny of national systems that in the past may have been closely guarded and protected by each country.

The methodology of referencing is still in its infancy with only a few countries having completed any substantial processes. The involvement of international experts is a key feature, as is the continued effort to include a broad base of stakeholders. The following broad categories of referencing are emerging:

- *upward referencing:* between an NQF and a transnational qualifications framework, and also between a sectoral qualifications framework and an NQF or wider transnational qualifications framework;
- *peer referencing:* between two NQFs, and potentially also between two transnational qualifications frameworks, or even between different sectoral qualifications frameworks – with the exception of the few isolated examples of peer referencing between NQFs, there are no reported cases of referencing taking place on this level;
- *downward referencing:* referencing from transnational qualifications frameworks to NQFs and even from NQFs to sectoral frameworks – this is possible but will in all likelihood remain limited.

FIGURE 1.2 gives a visual overview of the different referencing options within a continuum that ranges from a simple technical process, to one that has strong social dimensions.

1.7 THE RESEARCH APPROACH

This research took place over a relatively short period between October 2009 and January 2010 at a point when no other similar comparative analysis of transnational qualifications frameworks exists. This is a point at which NQFs have been developed for at least 15 years and where the international understanding of the potential of NQFs is steadily improving, but is also tempered by the long delays in obtaining empirical evidence to support any claims of significant impact. The study, overseen by the ILO in collaboration with the ETF (ILO, 2010a), has been carried out over the same period and was not yet published at the time of the completion of this research[2]. Another related ILO initiative, through Cinterfor, was also underway and nearing completion (ILO, 2010b). This has been published[3].

The research design included a selection of the five case studies (the EQF and four additional examples of transnational qualifications frameworks), a review of

FIGURE 1.2 REFERENCING OF QUALIFICATIONS FRAMEWORKS

Social dimension: High / Low

Sectoral Qualifications Framework

National Qualifications Framework

Transnational Qualifications Framework

Technical dimension: Low / High

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2 A non -authorised draft became available on the ILO website in 2010.

3 Basic tools for the design and implementation of Qualifications Frameworks, see:
http://evc.oitcinterfor.org/file.php/18/Marco_de_Cualificaciones_22_04_10_FINAL.pdf (in Spanish).

relevant literature (see the list of references) and an analysis of 19 targeted telephonic interviews with key individuals involved in each of the case studies (see the list of interviews in the annex). Based on three overarching research questions, the findings of the research process are presented in three parts: the first focused on stocktaking and critical analysis, the second on comparative analysis and the third is more prospective looking.

As is the case with any initiative of this nature, there were constraints that placed limitations on the research. These included the limited period over which the research took place, and as a direct result thereof, the limited number of interviews that could be accommodated. In this regard the CVQF and ASEAN Framework Agreement case studies proved particularly problematic, not only due to the significant time differences between South Africa and these two regions, but also due to the lack of well

documented information; in particular the very limited research activities that have taken place in relation to these two initiatives. The researcher's direct involvement in the SADCQF and VUSSC TQF processes enabled direct access to key individuals and materials that may otherwise have been more difficult to obtain, while the involvement of the ETF facilitated access to EQF materials and key individuals.

1.8 SUMMARY

This chapter has provided an overview of the conceptual framework and methodology of the research into the potential influences of transnational qualifications frameworks on the recognition of qualifications. This framework forms the basis of Chapter 2 as each of the five case studies are discussed in detail.

2. CASE STUDIES

This chapter provides a detailed overview of the background case study, the EQF, as well as each of the other four case studies. Each case study includes a descriptive or 'stocktaking' section that summarises the current level of development of the transnational qualifications framework, followed by a more critical analysis based on the interviews held with key stakeholders in each region. Four key strands follow from the conceptual framework developed in Chapter 1 of this report, and are applied in each of the case studies:

■ *description:* a brief overview of the context in which the transnational qualifications framework is being developed, the initiatives that preceded the framework, as well as the key features of the framework;

■ *influences and impact of/on the transnational qualifications framework:* various aspects are discussed, including the extent to which the framework embraces the learning outcome approach; lessons learnt from international experiences; the extent to which NQFs in member states are being referenced to the transnational qualifications framework, and in some cases, a transnational qualifications framework outside their own region; the increased credibility and mutual recognition of qualifications; as well as the sustainability of funding and established governance structures;

■ *level of development:* ranging from orientation, conceptual design, testing and implementation to review;

■ *interplay between the transnational qualifications framework and NQFs:* a description of the extent to which NQF or transnational qualifications framework development is prioritised.

2.1 EUROPEAN QUALIFICATIONS FRAMEWORK

Member states (31): Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom (EU member states); Iceland and Norway (European Economic Area members); and Croatia and Turkey (EU candidate countries).

2.1.1 The EU context

Few would dispute that the present-day European Union represents the most developed and economically progressive transnational development on the globe. While it is true that significant disparities exist both

FIGURE 2.1 **EU POPULATION AND EDUCATION EXPENDITURE**
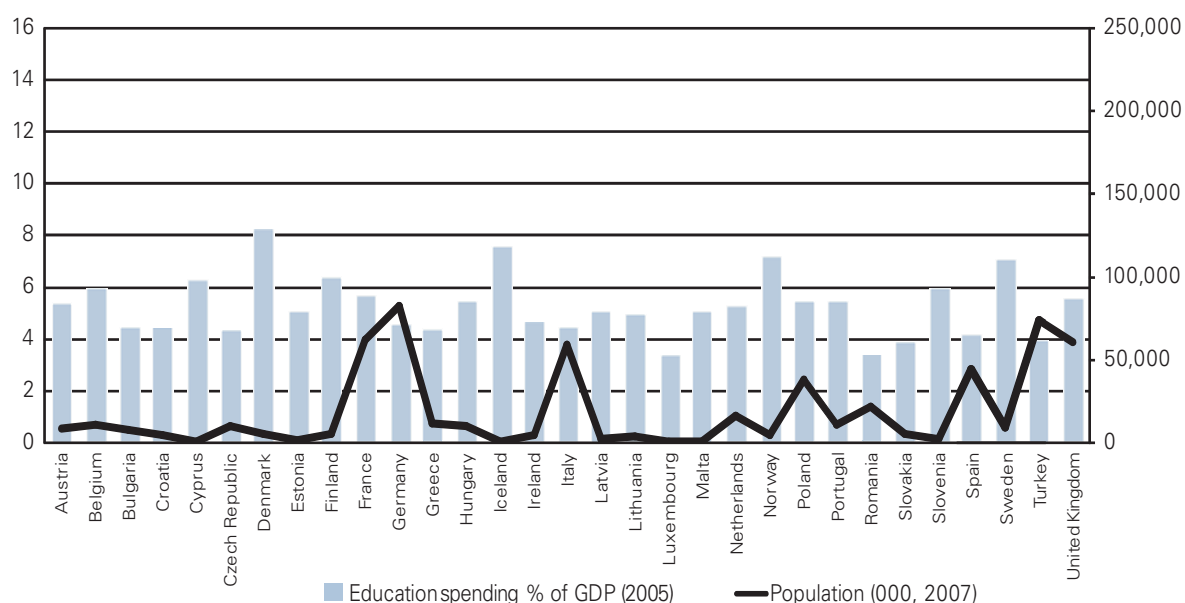
Source: UNESCO, 2007
Data on education expenditure is for 2007 with the following exceptions: Belgium (2004), Croatia (2004), Cyprus (2004), Germany (2004), Iceland (2004), Latvia (2004), Luxembourg (1999), Malta (2004) and Turkey (2004).

between countries and within them, on the whole the EU is increasingly taking the lead when compared to other regional and transnational initiatives. In 2007 the EU population was just below 600 million (including European Economic Area members and EU candidate countries), while the regional average educational expenditure (as percentage of GDP) was 5.3% in 2005. The regional average gross enrolment ratio was as high as 90.0% in 2007, while the EU's average adult literacy rate (15 years and older) was as high as 97.5% in the same year. A unique feature of the EU is its aging population as evident in the average youth population (0-14 years) of only 15.5% in 2007. Mobility of EU citizens has increased significantly over the years and is a key feature of the EU context (Cedefop, 2006).

According to the World Bank (2009) remittances within the EU total USD 59,224 million for inflow and USD 64,957 million for outflow for 2008. Considering that remittance flow is an important indicator of migration trends (although arguably not the only one), it is important to note the significant migration activity within the EU when viewed from this perspective. Countries that stand out as having high inflow rates in 2008 are France, Germany, Spain and Poland. Countries with high outflow rates in 2008 are Germany, Spain, Italy, Luxembourg and Norway. If taken as an important indicator of the migration patterns in the EU the remittance flow trends point towards high migration activity: high immigrant numbers in Germany, Spain, Italy, Luxembourg and Norway, high emigrant numbers for France, Germany, Spain and Poland. The disparities between inward and outward flows are significant across most EU member states and most extreme where the inflows exceed the outflows. A few examples are listed in **TABLE 2.1**.

2.1.2 The EQF and other European mobility initiatives[4]

The EQF was developed in response to requests from the member states, the social partners and other stakeholders for a common reference to increase the transparency of qualifications. In 2002 the European ministers in charge of lifelong learning invited the European Commission in cooperation with the member states to develop a framework for the recognition of qualifications for both education and training building on the achievements of the Bologna process and promoting a similar action in vocational training. In 2004 the ministers met in Maastricht where they stressed the priority for developing an open and flexible EQF as a common reference for both education and training. In March 2005, following work undertaken by the European Commission, the EU Heads of Government formally requested the development of an EQF. The EQF was envisaged as a framework that would bring together three significant areas of policy development: the Lisbon strategy, the Copenhagen process and the Bologna process, initiated in 2000, 2002 and 1999 respectively.

The Lisbon strategy was intended to make the EU the most competitive and dynamic knowledge-based economy in the world capable of sustainable economic growth with more and better jobs and greater social cohesion. The lifelong learning strand of the Lisbon strategy requires a challenging reform and modernisation of education systems of the member countries, with the aim that, by 2010, Europe should be the world leader in terms of the quality of its education and training systems. To achieve this, European countries need to ensure that

FIGURE 2.2 **EU GROSS ENROLMENT, YOUTH POPULATION AND ADULT LITERACY**

- Gross enrolment ratio (%, 2007, all levels combined, except pre-primary)
- Population 0-14 y (%, 2007)
- Adult (15+) literacy rate (%, 2007)
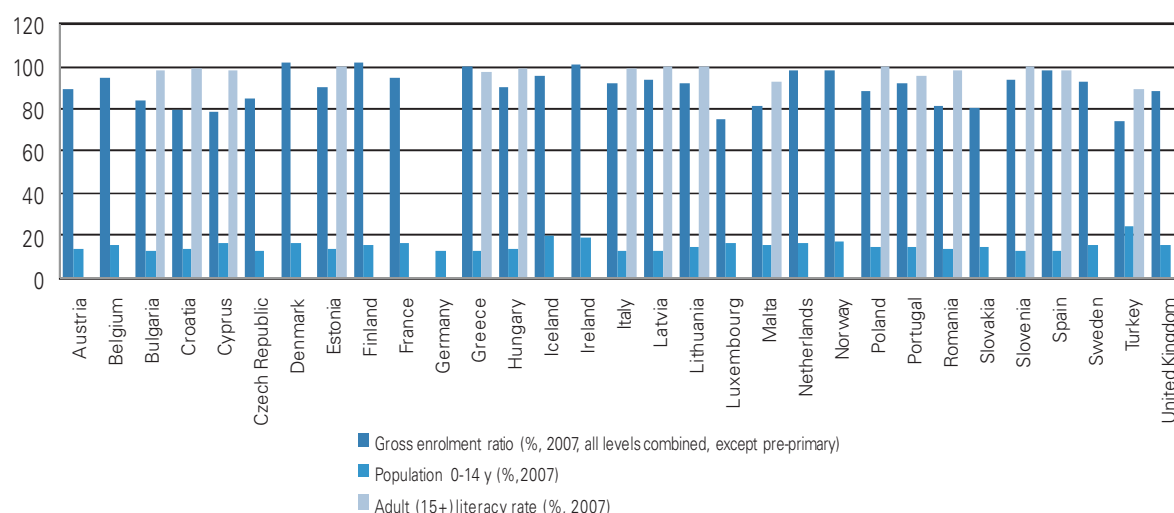
Source: UNESCO, 2007
Data on gross enrolment is for 2007 with the following exception: Malta (2005). No gross enrolment data was available for Germany. Data on adult literacy is for 2007 with the following exceptions: Croatia (2008) and Malta (2005). No adult literacy data was available for Austria, Belgium, Czech Republic, Finland, France, Germany, Iceland, Ireland, Luxembourg, Netherlands, Norway, Slovakia, Sweden and the United Kingdom.

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4   Some sections of this case study draw on an unpublished paper by Tuck et al. (2005).

FIGURE 2.3 EU OVERVIEW OF WORKERS' REMITTANCES, COMPENSATION OF EMPLOYEES AND MIGRANT TRANSFERS[1]
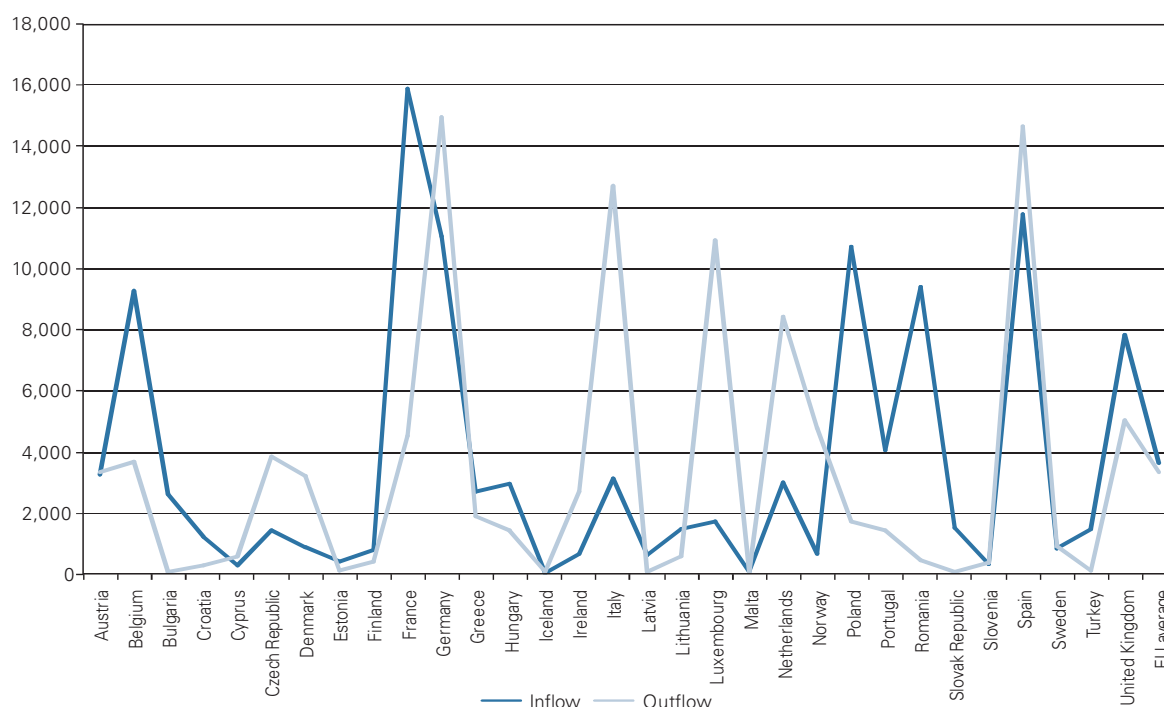
Based on World Bank, 2009
(1) 2008, USD million. Data for Croatia is for 2006. Updated data for Iceland, Norway and Turkey is from World Bank, 2011.

TABLE 2.1 REMITTANCE DISPARITIES IN THE EU

Country	Factor	
	Inflow exceeds outflow	**Outflow exceeds inflow**
Bulgaria	35	–
Ireland	–	4
Italy	–	4
Luxembourg	–	6
Norway	–	7
Romania	22	–
Slovak Republic	21	–

Based on World Bank, 2009

there is continuous updating and renewal of knowledge, skills and wider competences in the workforce and that there are as few barriers as possible to accessing education and training and to building on previously acquired knowledge and skills, either within or between countries. The EQF is seen as supporting all these aims. The Lisbon strategy is currently under revision and a new strategy for 2020 has been adopted.

As part of the Lisbon strategy, enhanced cooperation in vocational education and training is being carried forward by the Copenhagen process, which is currently focusing on quality assurance, transparency and recognition of qualifications; the development of a single Community framework for the transparency of qualifications and competences (Europass) (European Commission, 2004); the development of a credit transfer system for vocational

education and training (ECVET) (European Commission, 2004a); common criteria and principles for quality in VET (European Commission, 2004b); common principles for the validation of non-formal and informal learning (European Commission, 2002); and lifelong guidance with a European dimension for learners (European Commission, 2004). All of these feature to some extent in the proposals for the EQF.

The Bologna process, which could be said to have led the way in terms of pan-European cooperation on education matters, is concerned with the development of a European Higher Education Area (EHEA). (It should be emphasised that Bologna is not an EU initiative, instead it is coordinated by the Council of Europe which includes all the EU member states but also many non-EU countries.) This includes the adoption of a three-cycle system of qualifications, the establishment of a credit system based on the existing European Credit Transfer System (ECTS); the promotion of the European dimension in higher education (especially in the areas of quality assurance and learner mobility); and the establishment of the framework for qualifications of the EHEA (adopted in Bergen in 2005). As indicated above, signatories to the Bologna agreement include countries which are not members of the EU, which adds an important dimension of ownership or authorisation to the negotiations that will be required to align EHEA and aspects of the Bologna process to the EQF.

Another important but separate development is the EU Directive (36/2005) on the recognition of professional qualifications that brought together several regulations on professional qualifications that are regulated at national or European level. The purpose of the Directive is to facilitate mobility for individuals holding a qualification for these regulated professions, which are de jure a license to practise. The Directive builds on a number of directives from the 70s and early 80s to harmonise the training in some key professions and leads to automatic recognition of seven professions, mainly in the health sector. It also proposes a procedure for dealing with professions that are regulated in specific member states. The Directive prescribes strict criteria, covering for example the duration, location and content of the training as a condition for recognition. As the system is based on a prescriptive approach to the training and certification requirements based on required input criteria, it only facilitates the mobility of those qualified professionals who meet the largely harmonised input criteria.

This system of recognition is very different from the EQF, which aims to facilitate the comparison of levels of learning outcomes from qualifications that could have been obtained in different ways. Whereas the EQF seeks to facilitate the comparison of the results of the learning in terms of competences, the Directive establishes criteria to ensure matching training programmes. The regulated system ensures automatic recognition of individuals with the strictly corresponding professional qualifications, but does not allow partial recognition of the qualifications and skills of individuals coming from outside the matching systems. This means that skills shortages in these regulated professions cannot be filled flexibly by

requalifying individuals with a relevant background through e.g. recognition of prior learning or any other shorter route than the full training programmes.

There have been a number of consequences of this narrow approach. For example, Flanders sought to use recognition of prior learning as part of efforts to allow nurses the right to practise, but the European Commission intervened to forbid this. Another recent example of the inflexibility of the system is that it obliged Polish students of architecture to complete their practice in the crisis-stricken construction sector in Ireland, rather than allowing them to finish their studies in their home country where much better opportunities for practice existed.

The Directive is an inherited system which goes back to the seventies when the six original member states of the European Community tried to harmonise professional qualifications through harmonised training programmes. The principles promoted by the EQF are fundamentally different, and take account of the diversity of education and training systems in 27 member states and the realities of lifelong learning. They have moved away from the hard compliance of matching training programmes to the transparency and comparability of learning outcomes.

The declaration of the Ministers of Education of the European Union in Copenhagen in 2002 contained the following passage that was at the basis of the EQF:

> 'The Ministers recommend investigating how transparency, comparability, transferability and recognition of competences and/or qualifications, between different countries and at different levels, can be promoted by developing reference levels, common principles for certification, and common measures, including a credit transfer system for vocational education and training.' (Copenhagen Declaration, 30 November 2002)

This statement is quite significant as it provided a basis for both the EQF and the work on a European credit system for vocational education and training. Initially both developments were part of single initiative. A technical working group on credit transfer in VET was established in 2002. Initial work on reference levels had been commissioned by the credit transfer technical working group to the Qualifications and Curriculum Authority. Long before this work was published it started to lead a life on its own (Coles & Oates, 2004). The main message from the study which looked at different approaches to levels was that the levels should be based on learning outcomes if they were going to bridge learning from different contexts and that eight levels seemed to be the optimum number for a European framework.

The scope of the EQF work was to develop reference levels for lifelong learning and aimed to cover all forms of learning including more academic types of learning and general secondary education. Two years after the meeting in Copenhagen, ministers met again in Maastricht in 2004 to discuss progress in cooperation in vocational education and training. The ministers asked that priority should be

given 'to the development of an open and flexible EQF that would cover both VET and general (secondary and higher) education and would be based on learning outcomes' (Maastricht Communiqué, 14 December 2004). This was reconfirmed by the meeting of the Heads of Government (the Council) in March 2005.

Many experts in qualifications and qualifications systems were involved in developing the EQF. They included a large group of representatives from higher education, in particular the Bologna Follow-Up Working Group. Moreover, the expert working group included representatives from EU member states, social partners, sectors and European organisations and was led by the European Commission. The EQF descriptors for higher levels aimed to adapt the Dublin descriptors that were at the basis of the qualifications framework for the European Higher Education Area, opening them up for a wider set of qualifications. When the higher education ministers met in Bergen in May 2005 to announce the Framework of Qualifications for the European Higher Education Area, the development of the EQF was already well advanced.

EQF Consultation

The European Commission's consultation paper on the proposed EQF was published in July 2005, two months after Bergen, and went through an extensive EU-wide consultation process. The blueprint, prepared on the basis of the Expert Group's work, proposed an eight-level framework based on learning outcomes aiming to facilitate the transparency of qualifications and to support lifelong learning. The EQF was proposed as a common European reference framework which would link countries' qualifications systems together, acting as a translation device to make qualifications more readable and understandable across different countries and systems in Europe. It was presented as a meta-framework that enables different qualifications frameworks to be related to each other and subsequently to allow comparisons of individual qualifications. Such comparisons would form the basis of greater recognition and transfer of the learning outcomes (in the form of qualifications) acquired by individual citizens to facilitate the mobility of learners and workers. The paper made clear that such a meta-framework would not replace national or sectoral frameworks – indeed its viability would rest on building links with such frameworks. The EQF would be entirely voluntary, that is EU member states could choose whether or not to relate their systems to it.

The responses to the consultation demonstrated widespread support among European stakeholders for the Commission's proposal but also requested greater simplification, in particular of the reference levels. In response, the European Commission amended the original proposal, drawing on the input of experts from all the 32 countries involved as well as the European social partners. The revised text was then adopted by the Commission as a proposal on 6 September 2006. The European Parliament and the Council successfully negotiated the proposal during 2007, resulting in the EQF's formal adoption in February 2008.

EQF Recommendation

The EQF was finally adopted in 2008 in a Recommendation of the European Parliament and of the Council of the European Union of 23 April 2008 (Official Journal of the European Union, 2008/C 111). The Recommendation has a non-binding nature and thus conforms to the principle of subsidiarity. It is an example of 'soft' acquis or European law.

The actual EQF consists of four core elements:

- vision and objectives,
- a set of common descriptors, defined in terms of learning outcomes, and located in a structure of eight levels,
- definitions of key concepts,
- a set of common principles and procedures on quality assurance.

According to the Recommendation, the EQF has two interrelated objectives: the promotion and facilitation of regional (intra-European) mobility by increasing the transparency of qualifications throughout Europe, as well as increased portability and recognition of qualifications. Mobility is encouraged not only on a geographical level, but also between different sectors within the labour market; and to encourage implementation of lifelong learning within member states through flexible learning pathways, promoting the recognition of non-formal and informal learning, and breaking down barriers between different sectors within education and training systems.

The Recommendation provided a condensed explanation of the purpose and mechanisms of the EQF with very concrete steps for implementation. Formally, member states were asked to reference the levels of their qualifications systems or frameworks in a transparent way to the EQF. Where appropriate, level comparison could be facilitated by developing NQFs in accordance with national legislation and practice. By 2012 new qualifications certificates should mention the EQF levels. Countries were also asked to use learning outcomes in describing qualifications and to designate national coordination points to oversee the relationship between their respective national systems and the EQF, in particular to ensure the referencing of the national system or framework to the EQF.

The key to the EQF is its eight reference levels. The EQF aims to relate different countries' national qualifications systems and frameworks together using this common European reference point. The levels span the full range of qualifications from the upper levels of compulsory schooling to the most advanced qualifications for senior professionals. The EQF, crucially, is a lifelong learning framework, so that all its eight levels encompass qualifications gained in any setting, whether general education, higher education or VET for example. They are also intended to include qualifications acquired through non-formal and informal learning and lifelong learning opportunities as well as through formal learning. The levels are said to have been decided on after analysis of evidence from published research (for example Dreyfus &

Dreyfus, 1986) and from the main national qualifications structures and the structures of work practice in companies in many countries (see for detailed account Markowitsh & Luomi-Messerer, 2007-08).

The eight reference levels are described in terms of learning outcomes. The philosophical basis of the EQF is that Europe's education and training systems are so diverse that a shift to learning outcomes is necessary to make comparison and cooperation between countries and institutions possible. As indicated above, the Recommendation therefore requests that member states use learning outcomes when defining and describing qualifications.

Issues in implementation

The successful development and implementation of an EQF will require a shared understanding of key terms such as learning outcomes, qualifications, competences, and the framework itself. In using these terms, the 2005 consultation paper drew on the work of the OECD, the ETF, Cedefop and other international organisations and attempts to take developments under both the Bologna and Copenhagen processes into account, making adjustments to meet the specific context of the European meta-framework. It is not always clear, however, how far the issues associated with these terms are terminological and how far they are deeper, related more to fundamental beliefs about the processes which underly the terms. For example, the Recommendation defines qualifications as 'formal outcomes of an assessment or validation process which is obtained when a competent body determines that an individual learning outcome is to a given standard' and states clearly that the details of specific qualifications will not be described by the EQF, for which instead the national qualifications systems are the appropriate reference. But it does state that the EQF should enable international sectoral organisations to relate their qualifications systems to a common European reference point and thus show the relationship between international sectoral qualifications and national qualifications systems.

In order to facilitate the national coordination of referencing processes, the 2005 consultation paper had also pointed out that all current agencies for making comparisons between qualifications – networks such as the European Network of National Information Centres (ENIC), the National Academic Recognition Information Centres (NARIC), the national reference points for vocational qualifications, and the National Europass Centres – will need to be involved. The Recommendation itself formally takes account of Europass. These are examples of an area where the EQF seems to prompt, if not create, issues about existing structures and the need for structural changes in the wake of the EQF. As stated above, the Recommendation asks member states to designate national coordination points in order to support and guide the relationship between the national qualifications systems and the EQF. One of their tasks is to promote the participation of all relevant stakeholders including higher education and vocational education and training institutions, social partners, sectors, and experts in the comparison and use of qualifications at the European level.

The European Commission's view seems to be that the development of a single NQF, based on learning outcomes, and overseen by a national authority (whether agency or ministry) is the ideal approach to support national linking to the EQF. In this and other ways, it seems unlikely that the EQF will not require or result in some degree of convergence between national and (possibly to a lesser extent) sectoral systems and this raises two questions: how far down the national or sectoral systems will it be necessary to pursue measures of commonality and will the EQF turn out to be an *instrument of change*, in the control of those who choose to use it, or an *agent for change*, of its very nature requiring specific kinds of change.

While the EQF aims to make systems throughout Europe more comparable, there is strong resistance to uniformity. However, convergence is likely to take place. On the one hand, maintaining longstanding national traditions in education and training, for example, the dual model approach in Germany, Denmark and Austria, is seen as essential in responding to national challenges. On the other hand, in higher education within the Bologna process some form of harmonisation of higher education models has been promoted. Some degree of convergence in VET to the apprenticeship model seems to be gaining ground as well. International pressure for uniformity in European and international certificates and the pressure towards more compatible qualifications systems within NQFs are all factors that cannot be disregarded.

However, there is a clear distinction between the Bologna process and the EQF here. Although not mentioned explicitly in the official declarations, in Bologna circles the word harmonisation is frequently used. The official Bologna website (www.ehea.info/) mentions that provisions of the Bologna Declaration were set as measures of a voluntary harmonisation process. The introduction of common degree structures (the three-cycle degree system) has actually changed higher education provision in most of the 47 countries that participate in the Bologna process. Here, a degree of harmonisation is evident.

The EQF, on the other hand, is not an instrument for harmonising qualifications or parts of qualifications systems but is intended to function as a type of translation device to make relationships between qualifications and different systems clearer. The articles on education and vocational training on the EU's governing treaty explicitly exclude any harmonisation of the laws and regulations of the member states. But this does not mean that the EQF could not lead to a convergence of systems, as a number of countries now seem to be adopting eight levels for their national frameworks. But behind these levels an enormous diversity of systems and qualifications continues to exist.

The level descriptors are the core of the EQF. They are stated in terms of learning outcomes under three headings: knowledge, skills, and wider competences described in terms of responsibility and autonomy. Learning outcomes are defined in Annex 1 of the Recommendation as 'the statements of what a learner is expected to know, understand and/or be able to do on completion of a learning process which are defined in terms of knowledge, skills and competence'. These are set out at eight levels, with changes in the levels reflecting increased ability to deal with complexity, unpredictability and change.

THE DEFINING LEVELS IN THE EUROPEAN QUALIFICATIONS FRAMEWORK

	Knowledge **Theoretical and factual**	**Skills** **Cognitive and practical**	**Competence** **Responsibility and autonomy**
Level 1	Basic general knowledge	Basic skills required to carry out simple tasks	Work or study under direct supervision in a structured context
Level 2	Basic factual knowledge of a field of work or study	Basic cognitive and practical skills required to use relevant information in order to carry out tasks and to solve routine problems using simple rules and tools	Work and study under supervision with some autonomy
Level 3	Knowledge of facts, principles, processes and general concepts in a field of work or study	A range of cognitive and practical skills required to accomplish tasks and solve problems by selecting and applying basic methods, tools, materials and information	Take responsibility for completion of tasks in work or study; adapt own behaviour to circumstances in solving problems
Level 4	Factual and theoretical knowledge in broad contexts within a field of work or study	A range of cognitive and practical skills required to generate solutions to specific problems in a field of work or study	Exercise self-management within the guidelines of work or study contexts that are usually predictable, but are subject to change Supervise the routine work of others, taking some responsibility for the evaluation and improvement of work or study activities
Level 5	Comprehensive, specialised, factual and theoretical knowledge within a field of work or study and an awareness of the boundaries of that knowledge	A comprehensive range of cognitive and practical skills required to develop creative solutions to abstract problems	Exercise management and supervision in contexts of work or study activities where there is unpredictable change Review and develop performance of self and others
Level 6	Advanced knowledge of a field of work or study, involving a critical understanding of theories and principles	Advanced skills, demonstrating mastery and innovation, required to solve complex and unpredictable problems in a specialised field of work or study	Manage complex technical or professional activities or projects, taking responsibility for decision making in unpredictable work or study contexts Take responsibility for managing professional development of individuals and groups
Level 7	Highly specialised knowledge, some of which is at the forefront of knowledge in a field of work or study, as the basis for original thinking and/or research Critical awareness of knowledge issues in a field and at the interface between different fields	Specialised problem-solving skills required in research and/or innovation in order to develop new knowledge and procedures to integrate knowledge from different fields	Manage and transform work or study contexts that are complex, unpredictable and require new strategic approaches Take responsibility for contributing to professional knowledge and practice and/or reviewing the strategic performance of teams
Level 8	Knowledge at the most advanced frontier of a field of work or study and at the interface between the fields	The most advanced and specialised skills and techniques, including synthesis and evaluation, required to solve critical problems in research and/or innovation and to extend and redefine existing knowledge or professional practice	Demonstrate substantial authority, innovation, autonomy, scholarly and professional integrity and sustained commitment to the development of new ideas or processes at the forefront of work or study contexts including research

Adapted from the recommendations of the European Parliament and Council made on 23 April 2008

The development of the EQF as a meta-framework is a new enterprise and raises a number of issues as it breaks new ground. An important example here is the development of the EQF descriptors and levels which represents a compromise between 27 countries and is not necessarily a product of purely technical procedures; this notion of a 'social construction' – that is, agreed between partners – which extends far beyond the technical has in recent years proven to be a fundamental conceptual shift that has directly contributed to the successful development and implementation of qualifications frameworks internationally. This conclusion is well formulated by Markowitsch and Luomi-Messerer (2007-08, p. 54) when discussing the development and interpretation of descriptors of the EQF: 'The EQF is very much a political/pragmatic tool and not a scientific/empirical tool.'

The reference points have been designed and written to support the work of policy-makers and experts at national and sectoral levels and to make comparisons and cooperation easier to achieve and manage. It is intended that national and sectoral bodies will add amplification and exemplification to the EQF that will make it easier for national and sectoral experts to use the levels with their own qualifications. There is no intention that all qualifications should equally match all three types of outcome, and where they do, it is acknowledged that they may relate to different types of outcome at different levels. Thus the reference table of EQF outcomes will have to be used to achieve a 'best fit' match of national and sectoral qualifications to a level. According to the EQF Advisory Group note (European Commission, 2010a, p. 14), 'best fit' is a decision that is based on collective professional judgments of stakeholders. The best-fit principle (i.e. the referencing to the level that best matches the qualification) is thought to be a feasible method for classification. Precisely because education and training tracks impart knowledge, skills and competence to varying degrees and therefore qualifications cannot always be characterised unambiguously with one set of descriptors, experts see the best-fit principle as a welcome approach to referencing. On the other hand, the process of 'best fit' includes deciding on the weighting given to the technical and social dimensions in the final referencing decision. One of the main technical issues here is how to compare fairly distinct domains of learning outcomes used by different countries. In the case of the English and Northern Irish report (QF, 2009, p. 33) the social dimension was given a strong weighting in matching level 4 of the national framework to the EQF[5].

Quality assurance forms the basis for mutual trust within the EQF and emphasis is placed on simplicity through the development of guidelines that support quality assurance development within NQFs. Quality assurance is also part of the referencing criteria. The Recommendation provides a set of common principles for quality assurance in higher education and vocational education and training.

2.1.3 The common principles for quality assurance

The risk of a potential over-dependence of the EQF on national quality assurance processes is further mitigated through several pan-European arrangements, such as the European Quality Assurance Framework for VET (EQA VET), the work of Cedefop on the examination of EU experiences on the relationship between quality assurance and VET certification (Cedefop, 2009d) and other exchange experiences. A sub-group of the EQF Advisory Group also focuses on the relationships between national and regional quality assurance processes. The short-term integration of national and regional (trans-Europe) processes is however not foreseen.

2.1.4 The governance of the EQF

Implementation of the EQF is based on an open method of coordination which includes three key implementation structures.

- The *EQF Advisory Group* is the main coordination body that oversees the implementation of the EQF and provides coherence to the various processes. It consists of representatives from the member states, candidate countries, and countries from the European Economic Area outside the EU, the Council of Europe (which oversees the Bologna process), European social partners and various other stakeholders, such as chambers of commerce and industry, public employment services, and the voluntary sector. The Advisory Group meets between three to four times per year and has been responsible for the development of guidelines and procedures to be followed by member states when referencing their education levels in various attempts to develop mutual trust between them.

- *National coordination points (NCPs)* are responsible for more practical issues and ensure that country-specific issues are raised. In particular the tasks of the NCPs include: (i) referencing levels of qualifications within national qualifications systems to the EQF levels; (ii) ensuring that a transparent methodology is used to reference national qualifications levels to the EQF; (iii) providing access to information and guidance to stakeholders on how national qualifications relate to the EQF through national qualifications systems; and (iv) promoting the participation of all relevant stakeholders. To date these coordination points have been funded by the countries, but there has been a recent shift (following the global economic crisis) to provide specific funding in this area from 2010. Strong links exist between country representatives who sit on the Advisory Group and the EQF national coordination points. In 2010 the first network meetings of NCPs took place.

- *Support/working groups* are thematically based. Examples include sector qualifications, resources for the EQF, website development, quality assurance, and

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5   The technical analysis was finely balanced suggesting a level between level 4 and 5 in the EQF but tending to associate the level with level 4. However the social analysis suggested level 5 was a better match.

the learning outcomes approach. The support groups are very active and ensure systematic exchange of experiences within the EQF environment. For example, the work of the group on learning outcomes, involving representatives from more than 20 European countries, culminated in the preparation of European guidelines for validating non-formal and informal learning (Cedefop, 2009c). This group has also been a peer learning forum for exchanging experience on the development of NQFs in the countries that participate in the EQF process.

The role of the European Commission is central to the EQF implementation process as it is responsible for implementation at the European level; the Commission takes political initiatives on the transnational level, while the education and training function remains national. Despite the recognition of the importance of the Commission and other EU agencies, capacity and resources have remained limited according to stakeholders, and used mainly to pay contractors for specific projects, support to the working groups, and increasingly, to improve communication in the qualifications community. A small team in the Directorate General for Education and Culture coordinates the implementation of the EQF, supported by a locally-based expert from Cedefop.

The coordinating role of the EQF Advisory Group is seen as equally important, the more so because the EQF is a voluntary instrument that remains dependent on member states and other stakeholders' willingness to implement it. The need for a semi-autonomous regional agency is not high on the agenda within the EU as education and training is regarded as a national competence. The European Commission's services and the EQF Advisory Group are regarded as sufficient governance structures. Continuity of key staff is noted as an important factor for the relatively quick development of the EQF to date, although it is also noted that continuity and consistency has to be balanced with new thinking. The improvement of communication about qualifications and competences is increasingly being prioritised within the EQF context. The work of the EU bodies in particular is viewed as important. Examples include the support from agencies such as Cedefop and the ETF, the availability of resources for testing and piloting mainly through the Leonardo da Vinci programme, and engaging with external experts. National coordinating mechanisms (like national qualifications agencies) are viewed as essential by the European Commission and member states.

In a wider context, the EQF implementation is also supported by important Community instruments for mobility and innovation in VET – the Leonardo da Vinci programme and the European Social Fund. It is also supported by stakeholders' platforms such as the Directors General for Vocational Training (DGVT) and the Advisory Committee for Vocational Training, and other forums of European social dialogue[6].

Today the EQF represents an important shift towards outcomes-based qualifications, through a focus on

transparency within a diverse context. Cooperation takes place on the basis of recognised differences and not in an attempt to harmonise national systems. Referencing of the 27 member state NQFs against the EQF has been prioritised, and most countries indicate that they plan to have completed the necessary processes by the end of 2011[7]. By 2012, the aim is that all new qualification certificates issued by the competent authorities will contain a clear reference, by way of national qualifications systems, to the appropriate EQF level.

2.1.5 Influences and impact of the EQF

The learning outcome approach is seen as essential to the EQF. Even so, there are also some cautionary notes as the learning outcomes used to describe some qualifications are criticised for not sufficiently connecting to the labour market and the needs of employers; this issue has been identified as a key challenge by the European Commission and attempts are underway to connect referencing at national level with the labour market and employers. The need to go beyond learning outcomes, and also address curricula, teaching and assessment is often noted. Here also, the inclusion of learning outcomes in the Bologna higher education process has laid an important foundation for the EQF process.

Recent studies have shown that qualifications are changing in form but not necessarily in function, and as a result, a huge change in recognition of qualifications nationally or internationally is not expected (see ILO, 2010a; and Cedefop, 2009a). Even so there is no doubt that learning outcomes are clearly having an impact on the way in which the recognition of qualifications is understood and are contributing directly to the development of new methodologies for recognition. The extent to which the learning outcomes approach contributes to recognition of qualifications in practice is however less certain at this stage of the EQF's development.

The relationship between the EQF and the Bologna higher education framework is acknowledged as critically important. The fact that EU member states are now developing comprehensive NQFs (i.e. which include higher education, VET and other training sectors) is regarded as a direct result of the coordination between the EQF and the Bologna process which pioneered development in the higher education sector. The Bologna process has been an important point of inspiration for the EQF. In particular the Dublin descriptors developed for the three cycles of higher education defined by Bologna were adapted to fit within levels 5 to 8 of the EQF, the EQF descriptors taking account additionally of skills and autonomy alongside the more knowledge-oriented focus of the Dublin descriptors.

Nevertheless, the main criticism against the EQF is that it does not sufficiently tackle the barriers between VET and higher education. The extent to which the EQF (and

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6   http://europa.eu.int/comm/employment_social/social_dialogue/

7   Initially the reference process was planned to finish at the end of 2010.

THE SHIFT TO LEARNING OUTCOMES IN EUROPE

The environment in which learning outcomes approaches are now occupying an increasingly prominent position is the shift in European education and training systems towards lifelong learning frameworks. This gives learning outcomes a pivotal position in the redefinition of qualifications and the curriculum in VET, general and higher education.

In key respects, learning outcomes form part of an innovative approach to teaching and learning, which some commentators have identified as an integral part of a new learning paradigm. There is a growing and dynamic role for learning outcomes in education and training reform, always in conjunction with other factors. They are a tool that provides a guiding focus. Whether at the level of policy development or implementation, most European countries are planning or making a marked shift in this direction. Learning outcomes feature as a component of lifelong learning strategies and mechanisms for implementation and provide a key role in organising systemic aims, curriculum, pedagogy, assessment and quality assurance. All these factors remain significant in planning and implementation. The increasing use of learning outcomes is expected to have profound implications for making systems more learner-centred, for the organisation of institutions, for curriculum and for the role and training of teachers.
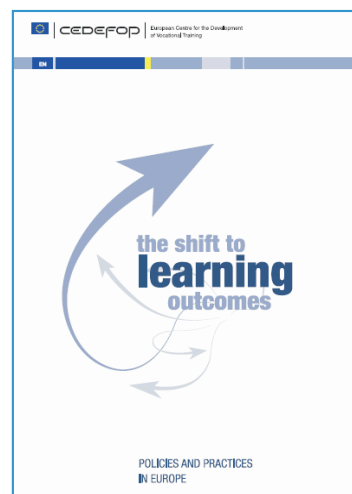
Source: Cedefop, 'The shift to learning outcomes: Policies and practices in Europe', 2009

learning outcomes) may encourage modularisation and the development of part qualifications is also of concern to some stakeholders. While it is not evident that the EQF is hindered in its implementation by the varying levels of application of quality assurance systems in member states, it is recognised that some member states still have much to do in developing robust national quality assurance systems.

The development and establishment of the EQF is a condition for the introduction of the credit accumulation and transfer scheme in all vocational qualifications across the EU, known as the European Credit System for Vocational Education and Training (ECVET). It is also an important driver for using learning outcomes for defining and describing qualifications. In this regard, qualification frameworks in general are criticised by some actors for having 'taken the pedagogy out of education and training'. In some contexts this influence is welcomed and seen as contributing to the opening of access and improvement of parity of esteem; this view is however severely contested. The assumption that much of the experience gained in the process of building NQFs can be translated to transnational qualifications frameworks, particularly regional qualifications frameworks such as the EQF, is questioned as it is argued that such broader applicability has not been verified in practice.

There is an issue about unintended and potentially negative impacts of the EQF. These presumed effects are varied but include the potential devaluing of traditional offerings of vocational education, additional bureaucracy, dangers in adapting to an extreme form of outcomes (that overlook teaching inputs and learning conditions), and ensuring that a critical mass of countries remains involved. The potential convergence of education and training systems, as mentioned above, may undermine the positive diversity of education systems – a hidden kind of harmonisation is feared.

2.1.6 Level of development of the EQF

While the EQF is being implemented by countries at a formal, institutional level, and it has gained wide acceptance throughout Europe, the evidence of current impact on employers, providers and learners remains limited to a few economic sectors, notably the IT community. Actors or stakeholders agree that it is too early to see actual benefits of the EQF at this stage ('the jury is still out'), while many argue that the EQF will only have an impact once NQFs in member states are fully developed.

The referencing process of NQFs to the EQF is crucial at the national level as it creates an opportunity for 'getting things out in the open'. It is acknowledged that referencing NQFs to the EQF must be adequate to build mutual trust. The challenge mentioned in this regard is that very few countries have referenced their NQFs against the EQF (only Ireland, Malta, UK and France) to date and so the methodology needs further testing and strengthening based on the experiences of countries that have completed the process through feedback into the EQF Advisory Group. The referencing process has been prioritised and most countries say they will be referenced by 2011. Taking into account the stage of development of NQFs (see next chapter); those deadlines seem difficult to meet. Countries experience the pressure of completing their referencing together with other member states, while the exercise can take considerable time, especially for consultation. In order to speed up the referencing processes there is a risk that referencing becomes a purely technical exercise. There is also external pressure as international sectoral organisations are already making requests to reference their qualifications (according to the Recommendation international sectoral organisations should be able to relate their qualifications systems to a common European reference point). Moreover, countries outside the EQF are unilaterally benchmarking their levels, credits and

qualifications types to the EQF, without any form of negotiation.

The ability to compare and understand qualifications, and therefore the increased transparency of qualifications, through a technical dimension only, is increasingly criticised. The intention for all certificates to have a reference to the EQF by 2012 is regarded as an important measure of its development. The increased involvement of employers in the EQF, albeit starting from a low base, is also viewed as a positive sign. Using the development stages proposed in Chapter 1 of this report, the EQF can be placed between the testing and implementation stages. There is also a strong view from researchers and implementers alike that capacity development within member states will effectively contribute to the sustainability of the EQF. The recent decision to use the European Social Fund to provide financial support for national coordination points in each member state is also viewed as important. Other factors that are identified as improving sustainability include the inclusion of VET, strong relationships with NQFs, and the absorption of the EQF into national policies.

2.1.7 EQF–NQF interplay

As noted by Cedefop in a recent review of the development of NQFs in Europe (Cedefop, 2009b), the majority of EU and EEA countries (including EU candidate countries) are currently involved in some level of NQF development. As noted in the report, countries with fully implemented NQFs are still few (Ireland, France, Malta and the UK), while almost all others have made clear signals that they will be following suit. It is also acknowledged that the introduction of the EQF has been a major catalyst that has contributed to NQF development in member states, with most countries planning to complete referencing to the EQF by the end of 2011. The majority of member states are basing their NQFs on the EQF in terms of levels (eight) and also the use of the EQF level descriptors as a basis.

The different stages of NQF development in EU member states are as follows (Cedefop 2009b):

- exploratory (Greece, Latvia, Slovakia);
- conceptualisation and design (e.g. Bulgaria, Cyprus, Hungary, Iceland, Netherlands, Norway, Poland, Portugal, Sweden);
- design and consultation (e.g. Austria, Belgium-Wallonia);
- design and early/partial implementation (Czech Republic, Luxembourg, Romania, Slovenia);
- conceptual design and partial testing (Italy);
- testing (Germany);
- implementation underway (e.g. Belgium-Flanders, Denmark, Estonia, Finland);
- implemented (Ireland, Malta, UK);
- implemented, currently under revision (France).

There is common agreement in the EU context that the EQF, as a reference framework, has had a significant impact on the new generation of NQFs (i.e. those at earlier stages of development), but less so on the first generation of NQFs (Ireland, Scotland, UK and France). Rather than being influenced by the EQF, the first generation of NQFs are seen as having had a significant influence on setting the parameters of the EQF. Here the Scottish SCQF and the Irish NFQ, and to some extent the French NQF, are regarded as having been very influential in the development of the EQF. This is not to ignore that there is for example evidence of impact of the referencing process on transparency of quality assurance processes at national level. The European Commission's note on the referencing process (2010a) mentions that countries that have already referenced their qualifications systems confirm that the referencing process is an opportunity to bring coherence to quality assurance arrangements as all of the main quality assurance bodies are involved.

On the other hand, the new generation of NQFs (also referred to as a third generation) is seen to have been influenced by the EQF, more so in countries that view their education and training systems as outdated. There is also a strong view that the Bologna process (which started in 1999) had a much more direct influence on first generation NQFs; here the Scottish Credit and Qualifications Framework is noted as an example of a framework that would have possibly been tighter had it not been influenced by developments in higher education in Europe.

The reference process also impacts on the interplay between NQFs and the EQF. As mentioned earlier, the experience of referencing NQFs to the EQF is at an early stage. Nevertheless, the three available referencing reports provide some insights about the national debates on EQF and the referencing process in each country. Both processes require high levels of communication, documentation and consultation.

While all three country cases followed similar processes in establishing the 'technical' relationship between their respective frameworks and the EQF, the UK referencing report is more explicit regarding the potential interplay between NQFs and EQF and the consultation process. For example, the report mentions that the consultation phase of the referencing process undertaken by the UK national coordination points revealed that stakeholders have a number of significant concerns about the referencing process specifically and about the introduction of the EQF generally and that there were many instances of misunderstanding among stakeholders about the purpose and functioning of the EQF (QF, 2009). In the same report one key issue that national stakeholders wanted to be addressed at the European level is related to levels of qualifications designed to recognise learning achievements that are below the level normally represented by vocational, pre-vocational or general educational qualifications. The fact that EQF levels do not accommodate these levels was widely raised as an issue in the consultation and there were strong recommendations that this issue should be brought to the attention of the EQF Advisory group and that this gap in the EQF structure should be addressed when the EQF is reviewed in 2013 (QF, 2009, p. 10).

2.2 SOUTHERN AFRICAN DEVELOPMENT COMMUNITY QUALIFICATIONS FRAMEWORK

Member states (15): Angola, Botswana, the Democratic Republic of the Congo, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Seychelles, South Africa, Swaziland, United Republic of Tanzania, Zambia and Zimbabwe.

2.2.1 The SADC context

Within the African context, the SADC region is probably one of the more advanced and remains strongly influenced by South Africa in both positive and negative ways. The SADC population was 257.4 million in 2007, while the regional average educational expenditure (as a percentage of GDP) was 5.6% in 2005. The regional average gross enrolment ratio was relatively low at 65.8% in 2007, while the regional average adult literacy rate (15 years and older) was 78.0% in the same year. The SADC region's average youth population (0-14 years) was

relatively high at 36.1% in 2007. Mobility within the SADC region has remained limited despite several attempts to encourage cross-border recognition through bi- and multilateral agreements and the development of a SADC Protocol on Education and Training in 1997. Illegal migration continues to be a key challenge, more so from less developed countries to South Africa.

Remittances within SADC total USD 2,054 million for inflow, and USD 2,185 million for outflow. South Africa stands out with by far the highest inflow rate in SADC (contributing 40% to the regional total), while Lesotho and Mauritius also have high inflow rates despite being small countries. South Africa contributes 52% to the total outflow rates, but the trend for the other member states is different to the inflow: Angola's outflow is very high (USD 603 million) compared to its inflow (USD 82 million); Zambia and Botswana also have relatively high outflow rates. If taken as an important indicator of the migration patterns in SADC the remittance flow trends point towards high migration activity (in- and outward) for South Africa, high emigrant number in the case of Angola (seven times higher than the inflow), and high immigrant numbers for both Mauritius and Lesotho. **TABLE 2.2** includes examples of the disparities between remittance inflows and outflows in SADC member states.

FIGURE 2.4 SADC POPULATION AND EDUCATION EXPENDITURE
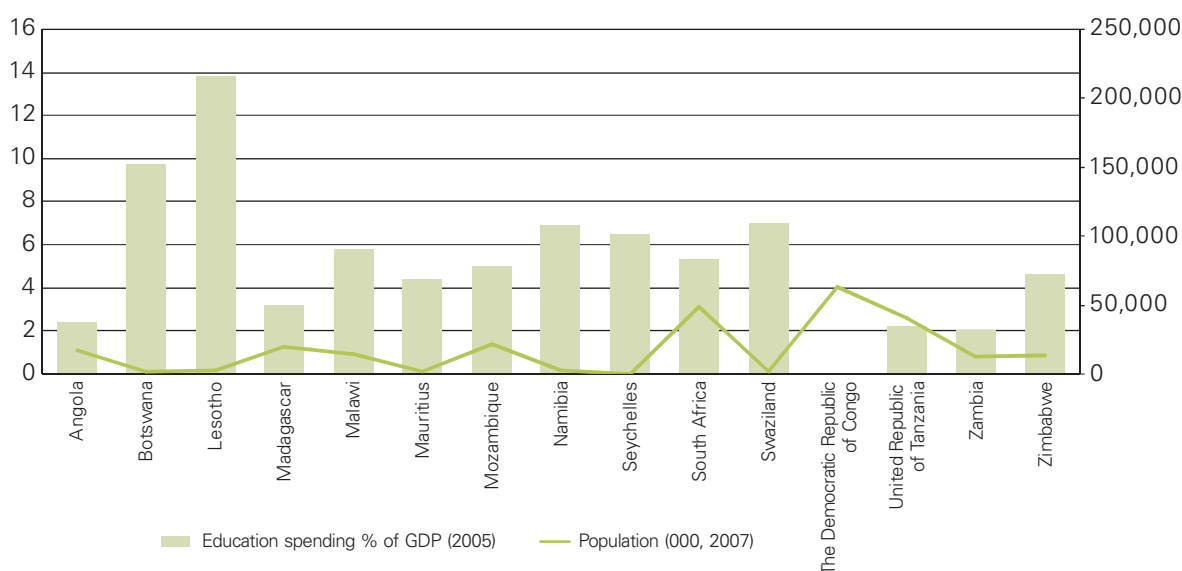
Education spending % of GDP (2005)   Population (000, 2007)

Source: UNESCO, 2007
Data on education expenditure is for 2007 with the following exceptions: Malawi (2003), Namibia (2003), Seychelles (2004), Tanzania (1999) and Zimbabwe (2000).

FIGURE 2.5 SADC GROSS ENROLMENT, YOUTH POPULATION AND ADULT LITERACY
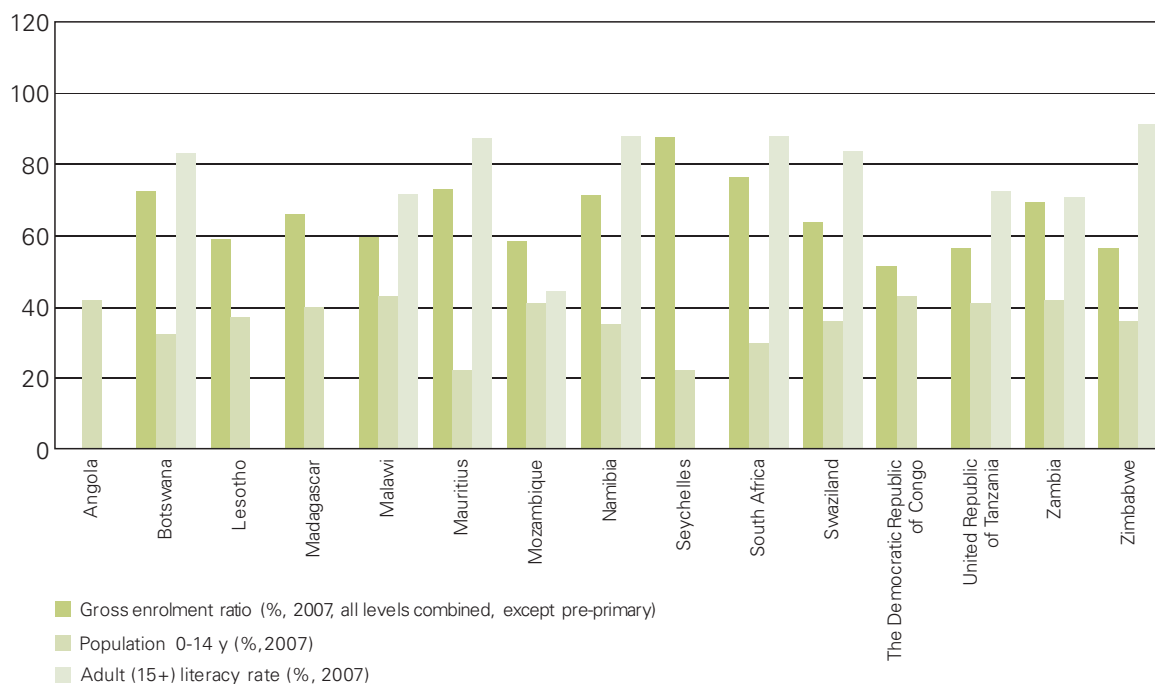
- Gross enrolment ratio (%, 2007, all levels combined, except pre-primary)
- Population 0-14 y (%, 2007)
- Adult (15+) literacy rate (%, 2007)

Source: UNESCO, 2007
Data on gross enrolment is for 2007 with the following exceptions: Botswana (2006), Madagascar (2008), Mauritius (2008), Namibia (2008), the Democratic Republic of the Congo (2008) and Zimbabwe (2006). No gross enrolment data was available for Angola. No adult literacy data was available for Angola, Lesotho, Madagascar, Seychelles and the Democratic Republic of the Congo.

FIGURE 2.6 SADC OVERVIEW OF WORKERS' REMITTANCES, COMPENSATION OF EMPLOYEES AND MIGRANT TRANSFERS[1]
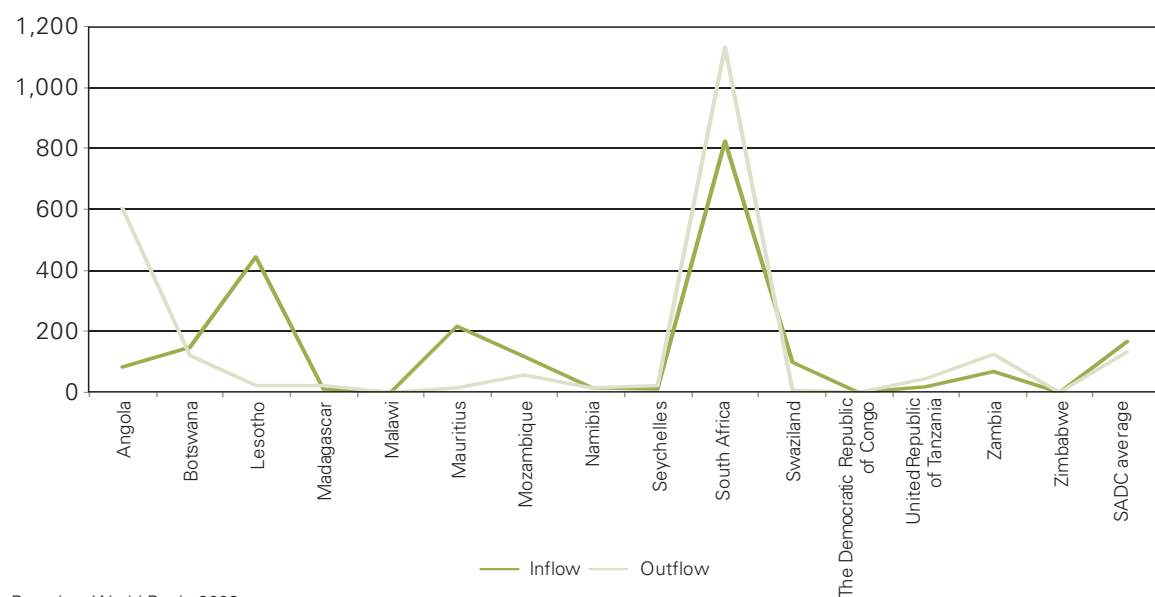
Inflow — Outflow

Based on World Bank, 2009
(1) 2008, USD million. Remittance data was not available for the Democratic Republic of the Congo or Zimbabwe.

TABLE 2.2 REMITTANCE DISPARITIES IN SADC

Country	Factor	
	Inflow exceeds outflow	Outflow exceeds inflow
Angola	–	7
Lesotho	21	–
Mauritius	15	–
Swaziland	12	–

Based on World Bank, 2009

2.2.2 Description of the SADC Qualifications Framework

One of the most important African and therefore also Southern Africa, initiatives that relate to quality assurance and the recognition of qualifications, at least in higher education, is the *Arusha Convention*. Adopted on 5 December 1982 and subsequently revised in 2002 (Cape Town) and 2003 (Dakar), the most recent decision taken in 2006 in Nairobi, was to rewrite the Convention, rather than amend it again. It is expected that this process will be completed in 2010. In brief, the Arusha Convention is a regional agreement between African states on the recognition of studies, certificates, diplomas, degrees and other academic qualifications in Higher Education African States. The Convention is premised on the notion that intensive cooperation among the African states is the most effective way in which progress in education and training made since colonial domination can be safeguarded and strengthened, while still respecting the specific character of each individual education and training system. Key focus areas of the Arusha Convention include strengthening and increasing cooperation related to education and human resources to improve the quality of higher education and the recognition of qualifications to ensure greater mobility. This includes supporting the development of systems to ensure the comparability of qualifications in order to facilitate the transfer of credits and awards for improved articulation, and an emphasis on the need for African states to take the necessary steps on national, bilateral and multilateral levels, in particular by means of bilateral, sub-regional, regional or other agreements and arrangements with the competent national or international organisations. To date a wide range of such agreements have been made, e.g. between Cuba and South Africa (for health workers), between Canada and Zambia (for accounting professionals), between Nigeria and Japan (also for health workers), and between Kenya and the UK (for architecture professions), to mention but a few.

In 1997, following the signing of the SADC Protocol on Education and Training, the SADC Technical Committee on Certification and Accreditation (TCCA) was established to oversee harmonisation and standardisation of education and training systems within the SADC region. The need for harmonisation was driven by the huge diversity of education and training systems within member states directly as a result of the colonial legacy within the region; this ranges from Anglophone countries (such as Botswana and South Africa), Lusophone (such as Angola and Mozambique) and Francophone (such as the Democratic Republic of the Congo and Mauritius) (see SARUA, 2009b). A core objective of the TCCA was the development of a regional qualifications framework for the SADC region, the SADCQF, considered the most sustainable strategy through which the objective of the SADC Protocol on Education and Training could be achieved. At the time, the development of the SADCQF remained largely isolated from similar developments in Europe and the Caribbean, but was strongly influenced by the ongoing implementation of NQFs in South Africa, Namibia and Mauritius. The extent of this influence remains contested, more so as other transnational developments, some which started much later, overtook the SADCQF. A key factor in this regard, as mentioned earlier, was the decision to prioritise the development of NQFs in member states.

The work of the TCCA included a number of activities such as the development of a database on qualification structures in the region and a comparative analysis published in 2001 (TCCA, 2001), a seminar on harmonisation and articulation initiatives (SAQA, 2003), and Q-Africa conferences held in September 2004 and November 2005 respectively. A SADCQF Concept Document (TCCA, 2005) was completed in March 2005 which brought together the various activities, agreeing that the SADCQF would ensure good communication amongst member states as:

'[…] a regional framework that consists of a set of agreed principles, practices, procedures and standardised terminology intended to ensure effective comparability of qualifications and credits across borders in the SADC region, to facilitate mutual recognition of qualifications among member states, to harmonise qualifications wherever possible, and create acceptable regional standards where appropriate' (TCCA, 2005, p. 23).

QUALIFICATIONS DEVELOPMENT IN AFRICA AFTER ARUSHA

There are three main issues regarding qualifications in Africa and elsewhere in the period since the Arusha Convention. First, the convention itself remained a purely symbolic gesture. Inasmuch as qualified people have been able to move from one country or institution to another, this has not been facilitated by the convention, but by local arrangements. Various reasons are put forward for this, from lack of political will, to the failure to set up an effective enabling structure. In some respects the time was not right. The exclusion of South Africa and Namibia, still entangled in apartheid, meant that a leg was missing from the table. This last failing is now decidedly out of the way. And, as can be seen in the presentation by Allais and the draft of a revised convention in this seminar report, the lack of political will or appropriate structure is being addressed in the ongoing work towards the adoption of a new convention. Time will tell if the latest moves are useful.

The second aspect of note about qualifications in the period since the original Arusha Convention is a shift in the very orientation towards learning itself. Internationally and in Africa, there has been a huge, but still incomplete and very imperfect, swing towards a revitalised valuing of skills or competence. It is difficult to identify the roots of this swing. It may be related to 'the end of ideology' and the end of the Cold War. It seems to have much to do with features of the globalising economy and its changing markets and modes of production. The move from manufacture to services, communication, information and consumption in economic activity is creating a major revolution in values and social structures. This entails great changes in the way people and societies think about, and manage learning. A related factor in the change, but one that has taken on a life of its own, is the massively growing influence of information technology on education, knowledge and work.

The third area of change in qualifications since the Arusha Convention is perhaps the most interesting in terms of the concerns of the seminar on articulation and harmonisation. This is the remarkable growth of the idea that qualifications could and should be used as instruments for the implementation of policy and transformation. Qualifications have always been used to serve particular interests and goals. Starting in the 1980s, however, there is a rising wave of conviction in the value of restructuring qualifications processes so that they shape, require, encourage, demand and enforce improvements in public learning. This movement, which one could perhaps call the 'quality assurance movement', has been motivated by several aims: the tightening up of accountability for investments in education and training; the enduring educational quest to shift modes of learning from an emphasis on empty routine or rote practices to an emphasis on creativity, problem solving, insight and so on; and the need to bring learning into line with the massive changes in production, technology and information.

Source: Editorial review of the proceedings of a SADC conference on harmonisation and articulation initiatives by Edward French, 2003
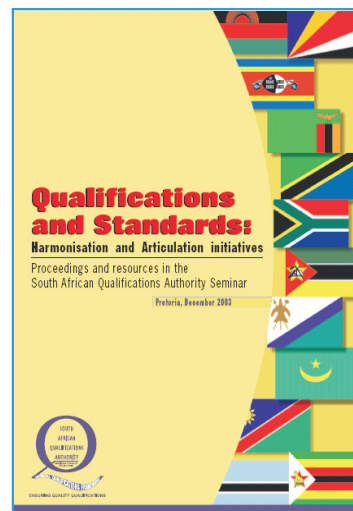
Based on a reading of a concept (TCCA, 2005) and following further consultation steered mainly by the TCCA, the SADC Integrated Council of Ministers approved the development of the SADC Qualifications Framework (SADCQF) in June 2005 as a necessary tool to achieve the objectives of the SADC Protocol on Education and Training. The understanding of the SADCQF was very broad, interpreted mainly as a 'set of agreed principles, practices, procedures and standardised terminology' (TCCA, 2005, p. 22). At the time the SADCQF was seen as a development that could take place in tandem with the development of NQFs in member states, although this view changed soon thereafter. Increased transparency of qualifications features as an objective of the SADCQF, although this is less explicit than is the case for the EQF. The SADCQF is also seen as an important mechanism through which the recognition of qualifications from other countries (such as Jamaican nurses in Botswana) can be achieved. For the governance of the SADCQF a SADC Qualifications Agency was proposed consisting of two sub-structures: a regional steering committee to oversee the development of the SADCQF as an extension of the TCCA; and an implementation unit as the executing arm of the SADCQA initially consisting of seconded staff from member states (SADC Secretariat, 2006).

The SADCQF recognises the autonomy and inter-relatedness of the areas of learning, including a realisation that sectors of learning (general, academic, vocational and occupational) have different needs and different ways of designing and using qualifications. This understanding, with the pragmatic phase-by-phase manner of implementation over a ten-year period, suggests that implementation of the SADCQF will be incremental and will possibly focus on specific areas like TVET in the early stages, but will eventually include all education and training sectors. According to the TCCA (2005) this approach will allow for sectoral interests to predominate, thereby counteracting any idea of prescriptiveness. The extent to which this approach has been successful in practice is however uncertain. Economic sector-specific developments, such as in hairdressing and food security (SADC 2005), have taken place, but have not been capitalised on to build the

SADCQF. This approach is very different from the one followed in the EQF where sector-specific developments have largely taken place alongside the EQF, with the exception of the higher education sector which was established prior to the EQF through the Bologna process. This point is taken up again in the comparative chapter of this report.

National sovereignty of member states is emphasised and is also used as a safeguard to limit prescriptiveness – the SADCQF is therefore a remarkably 'loose' arrangement. The system's features include outcomes-based qualifications and unitised standards in sectors where these are seen as appropriate. It proposes an eight to ten-level framework as a reference point and a centralised regional database. It was acknowledged at the time that much more work would have to be done to clarify the basic terminology and all elements of the features, even to the extent that they argue that the concept document might be 'too open ended and too cautious in its approach' (Samuels & Keevy, 2005, p. 12).

Quality assurance is viewed as the 'core of the SADCQF' and attempts are being made by the TCCA to develop mechanisms for the effective implementation of quality assurance at the level of the SADCQF. While the TCCA does not intend to interfere in national quality assurance arrangements there is consensus that, for the initial stages of the SADCQF at least, a regional mechanism will be needed to ensure that the system remains foolproof and credible. As noted before, the prioritisation of quality assurance and NQF development in member states has been the preferred political option in SADC, and has required the TCCA to develop quality assurance guidelines for national quality assurance bodies (see Sabaya, 2009) to start moving towards some form of harmonisation.

Despite the high level of political support, no resources were earmarked for the SADCQF project – a sign that the level of commitment may be in question. This was while the region had been receiving generous donor support in other areas (see Mudzi, 2005). As mentioned before, the parallel development of NQFs in member states is an important feature of the SADCQF. Agreement has been reached that an important purpose of the SADCQF would be to support member states (such as Angola, the Democratic Republic of the Congo and Mozambique) in the simultaneous development of their own NQFs. Another important feature of the SADCQF is the emphasis that the framework had to be 'home-grown'. As mentioned above, the isolated development of the SADCQF in the early years had some advantages, one of which has been to allow the region to negotiate the terrain without undue influence from other regions.

Mudzi (2005), in an informative paper on the history of the SADCQF, lists a number of issues that need to be noted to ensure that the development and implementation of the SADCQF goes ahead. Mudzi notes that there is a danger in rejecting what lies outside the SADCQF, i.e. the possibility of ignoring what is not understood or considered unimportant such as traditional and indigenous knowledge. She adds that increased bureaucracy must be avoided, and also that there is a danger in favouring

certain levels of education or sub-sectors at the expense of others. The danger of being dictated to by foreign standards, while international and regional links, including with the African Union, are not well established, the serious need for advocacy as well as the limitations of resources and absence of well-established and effective institutional mechanisms are also listed. Other issues raised by Mudzi include:

- Key players may not be well identified and empowered.
- The action plan for the SADCQF may not seriously be adhered to.
- A firm agreement on the SADCQF adopted by the region may be lacking.

The period 2005 to 2009 saw very limited progress with the SADCQF despite several attempts to maintain the momentum. These included a regional study on the benchmarking of quality assurance in 2007 (TCCA, 2007), which found that a common understanding of terminology and national processes is lacking within most SADC countries, a lack of consistency in design of qualifications as well accepted/common criteria for recognition of qualifications exists, and that a serious lack of awareness of regional and other international initiatives exists amongst SADC member states, more so in Lesotho, Mauritius and the Democratic Republic of the Congo. The development of guidelines for quality assurance in SADC (Sabaya, 2009) was recently completed, but has not yet been formalised. Research into the recognition and comparability of qualifications in the region (Schmidt, 2009) has also just been completed and proposes a mechanism for improved comparability and equivalency of qualifications in the SADC region based on common terminology, qualification types, regional level descriptors and a regionally-agreed credit system. Most recently it has been decided to develop a qualifications portal as a first step towards a SADCQF. The portal is envisaged as an integrated system that will be able to channel information on qualifications, learners and education and training providers from various sources in SADC member states into a seamless interface that will allow different levels of access to governments, education and training providers, and also individual learners. At least annual meetings of the TCCA took place, the most recent in Botswana in December 2009. Political instability in Zimbabwe also had a direct influence (amongst other factors the chairperson of the TCCA is a Zimbabwean), while the very limited capacity of the SADC Secretariat (despite the significant and ongoing efforts by the past and present coordinators) has undoubtedly been a major factor.

Another factor impeding progress has been the reluctance of post-apartheid South Africa to embrace a more dominant and steering role in the SADCQF process. With many years of NQF experience behind the country, South Africa's capacity to provide resources and technical support was without doubt underutilised and the relatively few bilateral initiatives between South Africa and SADC member states (such as the Seychelles, and to a lesser extent Namibia and Mauritius in the development of their NQFs) were not substantial enough to move the SADCQF forward. The ongoing domestic contestations related to

the South African NQF must also be mentioned as the model was seen as flawed (Allais, 2007) and any attempts at 'exporting' the South African NQF were severely criticised (Chisholm, 2007).

The outcomes-based approach is generally accepted in SADC, more so in the TVET sector where competency-based approaches have been preferred for some time, and have been coordinated through the establishment of national TVET agencies in many of the SADC member states (e.g. in Namibia, Tanzania and Zambia). Angola and the Democratic Republic of the Congo are possibly the only exceptions. In South Africa the outcomes-based approach has been severely contested and viewed as inextricably linked to the review of the South African NQF. For this reason the influence of South Africa on the SADC region, through both NQFs and outcomes thinking remains criticised. A strong historical focus on curriculum in SADC exists which has limited the impact of the outcomes-based approach. Vested interests in existing systems are also an inhibiting factor, as are the perceived limitations of outcomes at higher education level: outcomes are seen as undermining critical thinking at university level as an emphasis is placed on technical processes at the expense of deeper understanding, autonomy of learning and greater cognitive challenge.

Communication, advocacy and awareness creation of the SADCQF has been very limited and is regarded by many as another reason for the slow progress since 1997. Closer ties to African Union (through its Education Committee) initiatives in the area of qualifications recognition is seen as necessary, as well as with SADC education and economic clusters. Knowledge sharing and peer learning is limited mainly to the TCCA and a few individuals within the field. Mechanisms for knowledge sharing are limited to regional conferences (such as the Q-Africa conference that has been held on a bi-annual basis) and it is acknowledged by regional role-players, including the SADC Secretariat and the TCCA, that a much more systematic approach to communication and peer learning mechanisms is urgently needed.

The diverse context in Southern Africa, with its extreme disparities is regarded as a key factor that will continue to plague the development of the SADCQF. The often-cited example of the dire shortage of teachers in post-conflict countries, such as Angola, suggests that these countries are open to any kind of assistance without making any attempt to verify the credentials of teachers or the training offered by international and regional providers. This concern has prompted a regional teacher training institution like the University of South Africa to support the Angolan Ministry of Education with the development of a teacher qualifications framework.

The SADCQF is presented as a home-grown strategy that has attempted to take the unique context of the region into account. In addition to the challenges of different levels of development and extreme economic disparities (e.g. between South Africa and Zimbabwe), the different education systems (British, French and Portuguese) within the region as a result of colonisation remains a key challenge. The influence of other international

developments, such as the EQF and Bologna in Europe, is however recognised but tempered by the fact that the SADCQF started much earlier and was therefore less influenced from outside. It is acknowledged that lessons from outside of SADC, such as in the Caribbean, have not been sufficiently explored over the years. More recently the direct influence of the EQF in developing the draft SADCQF level descriptors is recognised (Schmidt, 2009), as well as the increased demand that the SADCQF mechanism translates not only in the region, but also with other regions.

The lack of trust between member states, mainly as a result of the diversity of the education and training systems and the varying levels of development between countries, is recognised as a key challenge in the region. The dominance of the Anglophone countries in the region, directly as a result of the fact that the emerging NQF approach originated mainly in the Anglo-Saxon world (UK, Scotland, Australia and New Zealand) suited these formerly colonised countries much better, continues to be contested.

Without any substantial referencing process agreed to within the SADC, member states are rightfully concerned about the levels at which their qualifications may be pitched on the SADCQF. It is evident that outside the EQF debate, referencing is not well understood, nor does it feature on the agendas of national, regional or transnational mechanisms. This also applies to SADC where some form of benchmarking has taken place between countries with NQFs (e.g. corresponding levels of qualifications on the Namibian and South African NQFs), but where no discussions are taking place to reference NQFs to the SADCQF. Considering that the SADCQF is at an earlier level of development than the EQF, it is understandable that this is the case, but the point here is that much greater effort will be required to develop a systematic approach to referencing within SADC as the framework is further developed. As is the case with the EQF, the convergence of education and training systems in SADC is regarded as an inevitable consequence of the regional qualifications framework; in the case of the EQF this outcome is viewed as unintended and problematic, but in the case of the SADCQF the harmonisation is an explicit objective agreed to by member states.

Outward migration (also referred to as brain drain), mainly towards South Africa, but also internationally, is viewed as a potential negative outcome of a successful SADCQF facilitated by increased international recognition and credibility of SADC qualifications. A strong distinction is made in SADC between two different forms of recognition of qualifications: comparability is seen as a higher order process determining the face value of qualifications by using a set format and criteria, while equivalency is seen as determining the extent to which qualifications are the same, also using a format and criteria, but in this case requiring a measure akin to international curriculum standards (Keevy & Jansen, 2010). This distinction is revisited in Chapter 3 of this report. The important point here is that the SADCQF is viewed as an instrument that will be able to contribute to recognition, but not to equivalency.

PROPOSED LEVEL DESCRIPTORS FOR THE SADC QUALIFICATIONS FRAMEWORK

	Knowledge	**Skills**	**Autonomy and responsibility**
Level 10	Makes a substantial and original contribution to knowledge in the field through research and scholarship	Conducts original research which is evaluated by independent experts against international standards Demonstrates problem solving ability and critical evaluation of research findings for academic discussion	Demonstrates full responsibility and accountability for all aspects of advanced research work
Level 9	Demonstrates mastery of theoretically sophisticated subject matter, showing critical awareness of current problems and new insights at the forefront of the discipline area	Conducts original research deploying appropriate research methods and processes primary and secondary Sources information using rigorous intellectual analysis and independent thinking and applies knowledge in new situations Demonstrates independent thinking, problem solving, critical evaluation of research findings and ability to make judgements based on knowledge and evidence	Shows independence, initiative and originality and the ability to manage own and group outcomes in complex and unpredictable situations
Level 8	Demonstrates critical understanding of the principles, theories, methodologies, current research and literature of the discipline	Demonstrates capacity to use a coherent and critical understanding of the principles, theories and methodologies of a particular discipline Selects and applies appropriate research methods and techniques, and critical analysis and independent evaluation of information	Operates within the context of a strategic plan with complete accountability for management of resources and supervision of others
Level 7	Demonstrates knowledge of a major discipline with possible areas of specialisation, including command of the ideas, principles, concepts, chief research methods and problem-solving techniques of the recognised discipline	Demonstrates intellectual independence, critical thinking and analytical rigor, and advanced communication and collaborative skills in complex and variable contexts	Designs and manages processes and works with broad accountability for determining, achieving and evaluating personal and group outcomes
Level 6	Demonstrates specialist knowledge in more than one area and ability to collate, analyse and synthesise a wide range of technical information	Demonstrates ability to apply specialist knowledge and skills in highly variable contexts and formulates responses to concrete and abstract problems	Manages processes and works with complete accountability for personal and group outcomes
Level 5	Demonstrates a broad knowledge base with substantial depth in some areas, ability to analyse information and construct a coherent argument	Applies a wide range of technical and/or scholastic skills in variable contexts using standard and non standard procedures, often in combination	Works independently under broad guidance and can take some responsibility for supervising the work of others and group outcomes
Level 4	Demonstrates a broad knowledge base, incorporating some abstract and technical concepts, and ability to analyse information and make informed judgements	Applies a moderate range of technical and/or scholastic skills which are transferable in familiar and unfamiliar contexts, using routine and non routine procedures	Shows ability for self direction, requiring little supervision, and complete responsibility for own outcomes and some responsibility for group outcomes
Level 3	Demonstrates basic operational and theoretical knowledge and ability to interpret information	Demonstrates a range of well developed skills and ability to apply known solutions to familiar problems	Works under general supervision with some responsibility for quality and quantity of output
Level 2	Demonstrates recall and a narrow range of knowledge and cognitive skills	Can carry out processes that are limited in range, repetitive and familiar	Applied in directed activity under close supervision
Level 1	Demonstrates basic general knowledge and numeracy and literacy for everyday purposes	Can follow simple instructions and perform actions required to carry out simple concrete tasks requiring no special skills	Works under close supervision in familiar surroundings and structured contexts

Source: Report on qualifications in the SADC region prepared for the TCCA by Alison Schmidt, 2009

The idea of 'strength in numbers' features strongly in the SADC context as there is significant expectation amongst member states that increased international recognition of national qualifications will be possible within the regional collaboration (as opposed to a single developing or small country that may find it difficult to argue with more developed countries and regions for the recognition of its qualifications). This notion is also expressed in two other case studies (in the Caribbean and Virtual University of the Small States of the Commonwealth) that are discussed further on in this report. This added value of the SADCQF is often described as a potential 'tool for branding' through which it will be possible to indicate that a qualification has met SADCQF requirements by adding a SADCQF logo on certificates. A similar notion exists within the EQF context, although it further advanced with specific deadlines for implementation by 2012.

In terms of the actual impact of the SADCQF on the recognition of qualifications it is safe to say that it is still too early to make any substantial judgments. Many ideas are being discussed, but, as noted by an interviewee 'the regional qualifications framework is not a reality yet, it is still a dream'.

The evaluation of foreign qualifications features prominently in the SADC context and is in most countries embedded within the NQF structures; this is different to many other parts of the world where credential evaluation agencies often function more independently (e.g. NARIC in the UK, AEI NOOSR), possibly with the exception of New Zealand and Ireland where the national qualifications authorities deal with this issue. In SADC there is an expectation that the evaluation of foreign qualifications will be significantly streamlined through the SADCQF. This link between the regional qualifications framework and credential evaluation is important more so when considering the recognition of qualifications using new technologies that are not limited to the traditional time-based approaches.

To date the SADC Secretariat has played an integral role in the SADCQF process. While this role has been limited mainly to facilitation and coordination, the nature of the flexible process followed, and in particular the direct dependence of the TCCA on the Secretariat has meant that progress has been severely hampered due to limited financial and human resource capacity of the Secretariat. Attempts at establishing a regional implementation agency culminated in a business proposal to senior officials and ministers in 2006, but was unsuccessful despite a general consensus that implementation requires a small dedicated unit to support the work of the SADC Secretariat. While some members of the TCCA have remained adamant that a regional agency is still needed, the consensus seems to have waned, and remains a point of contention even in 2010.

The TCCA itself has been criticised for delaying the implementation of the SADCQF. Since its establishment in 1997 (some 13 years ago), and considering several contextual limitations, the TCCA has been unable to make any substantial progress beyond a limited number of research initiatives, and has become subject to changes in membership as some individuals have retired and others have moved on to take up other responsibilities in their countries. At present the TCCA faces the real threat of losing the continuity on which it has relied for many years, as renewed calls are being made to include the business sector in the establishment of the SADCQF.

The SADC region has not escaped the dependence on donor funding evident in many parts of the developing world. Even the economic powerhouse of the region, South Africa, received generous funding from the EU, DANIDA, CIDA and others when it set up its own NQF. Similarly other member states remain locked into donor agreements for TVET reform and NQF development; examples include Botswana, Mozambique, the Seychelles, Tanzania, etc. Although this support is welcomed and sorely needed in the region, it cannot be disputed that the scale of support has a strong influence

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INVOLVEMENT OF STAKEHOLDERS IN THE SADC QUALIFICATIONS FRAMEWORK

The underlying assumption of the TCCA in preparing this concept paper is that greater part of the work in developing SADCQF will be done by the relevant parties or stakeholders using their own funds and the participation and consultation process being sine qua non for the success of SADCQF. Key stakeholders include: universities, which already have some degree of communication on qualifications and standards and could be encouraged to extend their activities and expertise; industries taking new initiatives and development in training, which could promote the development of new or appropriate qualifications for use in the region; some sectors of employment that could generate spontaneous demand for more widely recognised qualifications – e.g. recent developments by the Food Security Training Programme (SADC Secretariat, 2005), the SADC Marine and Fisheries Programme, and the benchmarking of hairdressing qualifications (SADC Secretariat, 2004:i) by Botswana, Lesotho, Namibia and South Africa; and the examination agencies that may have a particular interest in benchmarking processes to strengthen their international standing.

Towards a Southern
African Development
Community Qualifications
Framework

Concept Paper and Implementation Plan

Technical Committee on Certification and Accreditation

Maseru
March 2005

Source: SADCQF concept document developed in 2005

on the policy decisions within the member states. Further direct involvement from international agencies, such as the ILO, UNESCO and the UNDP has the same effect. It is evident that the SADCQF process has become a victim of this regional dependency on external funding, and as a result, has been delayed when such funding has not been forthcoming. The point is increasingly being made that it is time for SADC to take the lead and inject funding and resources into the SADCQF process. The failure of this regional body to take ownership of the SADCQF has clearly been the most serious reason for the delayed implementation.

The sustainability of the SADCQF has become directly dependent on NQF development in the region as a result of the prioritisation of NQF. As will be shown in Chapter 3, all SADC member states are now involved in NQF development, and while the decision in countries to develop NQFs is not as obvious as with the EQF, the SADCQF has nonetheless acted as an important catalyst despite the NQF prioritisation decision. When compared to the antecedents of the EQF in Europe, namely the Bologna process, the Lisbon strategy and the Copenhagen process, it is evident that the SADC region has moved at a slower pace. Without trying to suggest that the EQF process represents an ideal that must be followed to the letter in other parts of the world, it is important to note that similar interventions were developed in SADC, with significant activity during the same period (mainly between 1997 and 2005), but at a much slower pace. The SADC Protocol on Education and Training remains an overarching policy for the recognition of qualifications in the region, but has had limited impact. The Arusha Convention, which was adopted as early as

1982, and revised several times after that (2002, 2003 and again in a process that started in 2008 but is still to be concluded), remains a key supporting structure for the SADCQF that is yet to provide the broader stabilising effect that is needed. Major SADC sectoral initiatives, such as for higher education or TVET, have been less successful but have taken place nonetheless. In the case of TVET national agencies from across SADC have started to meet on a more regular basis, while for higher education a Southern African Regional University Association (SARUA) has been established. In neither case has any substantial progress been made in developing regional mechanisms to recognise or harmonise qualifications.

## 2.2.3 Level of development of the SADC Qualifications Framework

The level of development of the SADCQF, despite the extended period of activity between 1997 and 2010, remains at a very early stage, perhaps even still at the level of orientation, although some suggest that progression has been made to a more conceptual and design stage as discussion on mechanisms (such as website and portal) are taking place. More recently a renewed effort at accelerating development has raised expectations as it is acknowledged that member states have progressed significantly in understanding the qualifications framework discourse, compared to the early years when it was only a select few countries (South Africa, Namibia and Mauritius) that were driving the process. The impact of the SADCQF on individuals

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WHY THE SLOW PROGRESS WITH THE SADC QUALIFICATIONS FRAMEWORK?

The idea of a regional qualifications framework has more recently been given renewed impetus through the African Union's drive for the harmonisation of higher education. Progress towards its adoption has, however, been slow, impeded by the current absence of strong national quality assurance systems. In the view of the SADC Ministerial Committee on Education, the adoption of a framework is dependent on such quality assurance systems being in place. A regional qualifications framework does not necessarily have to take the form of a single framework which applies directly to all qualifications offered in the region. Rather, if national qualifications frames are in place, the regional framework may take the form of a meta-frame which provides a mechanism of relating national frameworks to each other. In a similar manner, articulation with (but not necessarily being identical to) other regional frameworks will become increasingly important.

The impact of the Bologna agreement in Europe has already been felt strongly in some countries in the SADC. The Francophone and Lusophone countries in particular are already moving towards adoption of this system. Some concerns have been raised regarding this development, particularly with regard to its imported nature, and the pressure felt by former colonies to adopt the model in use in the former colonial country. There is currently a lack of understanding within the region of the different systems used in each country. Although a SADC study has examined the form that a regional qualifications framework could take, there has been no systematic study of the current and proposed qualifications frameworks in each country. There is little sense of the extent to which systems differ, and no consensus on a shared terminology. Account must be taken of the historical traditions in the region before comprehensive reform can be undertaken.

Source: Publication by the Southern African Regional Universities Association (SARUA) on leadership challenges for higher education in Southern Africa, 2009
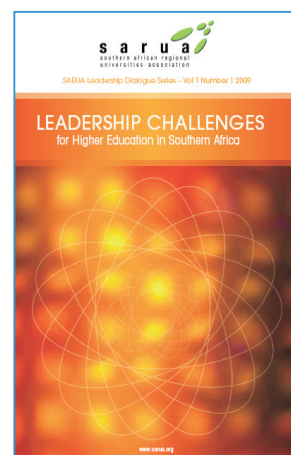
and employers remains very limited, if at all. Here again, the prioritisation of NQFs in the region have had a significant impact on the lack of awareness of the regional process.

2.2.4 SADC Qualifications Framework–NQF interplay

From the establishment of the TCCA in 1997, three reviews of the progress with NQF development in member states were made in 2002, 2005 and 2007. Although the seven stages and respective indicators were agreed upon prior to measurements (see below), the outcomes of consecutive measurements were often contested (TCCA, 2007).

The seven stages of NQF development and their related indicators are listed below:

- **Stage 0**   No progress made and no reports received

- **Stage 1**   Background work underway and initial discussion with politicians, education and training officials and advocacy being done
- **Stage 2**   Initial development, task teams/steering committee established, conceptual papers developed and implementation plans developed
- **Stage 3a**   Draft legislation formulated, some structures already in place
- **Stage 3b**   Legislation formulated and passed, authority established, structures established, development of procedures and processes, development of standards, quality assurance systems and management of information system
- **Stage 4a**   Advanced implementation and system already functional for five or more years
- **Stage 4b**   Continuous reviews conducted and evaluation and adjustments applied.

TABLE 2.3 gives an overview of the results of the three reviews (Madagascar only joined SADC in 2006 and so no prior verified assessment was done; Swaziland was not assessed in 2005).

TABLE 2.3 PROGRESS IN NQF DEVELOPMENT ACROSS SADC MEMBER STATES

Country	Stage (and year in which the review took place)						
	0	1	2	3a	3b	4a	4b
Angola			2007		2002	2005	
Botswana			2002	2005 2007			
Democratic Republic of the Congo	2002 2005 2007						
Lesotho			2002	2005 2007			
Madagascar			2007				
Malawi	2002	2005	2007				
Mauritius					2002 2005 2007		
Mozambique		2002 2005	2007				
Namibia					2002	2005 2007	
South Africa					2002	2005 2007	
Swaziland		2007	2002				
Tanzania	2002	2005	2007				
Zambia		2002	2005 2007				
Zimbabwe				2002 2005 2007			

Source: TCCA, 2007

Progress tables, such as Table 2.3, should be interpreted as indicative only and can often be misleading. In the case of SADC the review status of each country (in 2002, 2005 and 2007) was consulted with the specific countries, often within the broader TCCA forum, which resulted in several adjustments, usually to more advanced stages, sometimes as a result of new evidence to support such a change, but more often than not to strengthen the image of the member state in a forum where other member states were present. Angola is a case in point as is evident in the overly ambitious ratings received in 2002 and 2005, and which were adjusted to the more realistic position in 2007.

The prioritisation of NQF development in the SADC region has been contested but has remained the dominant approach at least since 2005 when the SADCQF concept document (TCCA, 2005) was presented to senior officials and ministers. Confronted with the realities of the SADCQF, more so the human and financial resource implications, a delay in implementation was favoured. Considering also that some member states still had much to do in developing their own systems (countries, such as Angola, Mozambique and the Democratic Republic of the Congo, were just emerging after years of conflict) the consensus was that quality assurance development, as a first step towards NQFs, was the way to go. To date this position remains unchanged, although some concerns have been raised questioning the expectations of some member countries that an NQF is a pre-condition for the SADCQF.

2.3 TRANSNATIONAL QUALIFICATIONS FRAMEWORK FOR THE VUSSC

Member states (32): Antigua and Barbuda, Bahamas, Barbados, Belize, Botswana, Brunei Darussalam, Cyprus, Dominica, Fiji, Gambia, Grenada, Guyana, Jamaica, Kiribati, Lesotho, Maldives, Malta, Mauritius, Namibia, Papua New Guinea, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Seychelles, Sierra Leone, Solomon Islands, Swaziland, Tonga, Trinidad and Tobago, Tuvalu and Vanuatu.

2.3.1 The VUSSC context

Remittances within VUSSC member states total USD 5,670 million for inflow, and USD 1,798 million for outflow. Jamaica stands out with by far the highest inflow rate amongst the VUSSC member states (contributing 39% to the regional total), with Gambia the only other country with a significant inflow rate (if compared to the other VUSSC member states). Jamaica's outflow rate is much lower than its inflow rate, although this still represents 26% of the total inflow rate for the VUSSC member states. Cyprus and the Bahamas also show relatively high remittance outflow rates. The remittance rates suggest that many Jamaicans work abroad, while Cyprus and Bahamas has relatively high numbers of immigrants. **TABLE 2.4** includes examples of the disparities between remittance inflows and outflows in VUSSC member states.

FIGURE 2.7 COMMONWEALTH SMALL STATES POPULATION AND EDUCATION EXPENDITURE

Education spending % of GDP (2005)   Population (000, 2007)
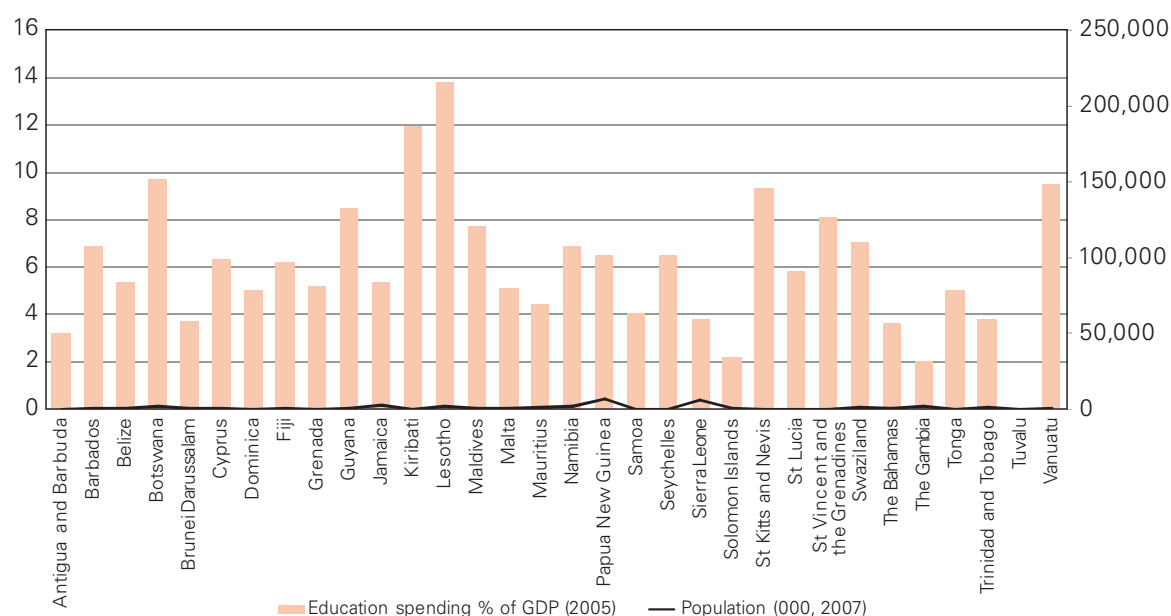
Source: UNESCO, 2007
No population data was available for Antigua and Barbuda, Dominica, Saint Kitts and Nevis, and Tuvalu. Data on education expenditure is for 2007 with the following exceptions: Antigua and Barbuda (1999), Brunei Darussalam (2000), Cyprus (2004), Dominica (1999), Fiji (2004), Grenada (2003), Kiribati (2002), Malta (2004), Namibia (2003), Papua New Guinea (1979), Samoa (2000), Seychelles (2004), Solomon Islands (1999), the Bahamas (2000), Gambia (2005), Tonga (2004), Trinidad and Tobago (2000) and Vanuatu (2003). No education expenditure data was available for Tuvalu.

FIGURE 2.8 COMMONWEALTH SMALL STATES GROSS ENROLMENT, YOUTH POPULATION AND ADULT LITERACY
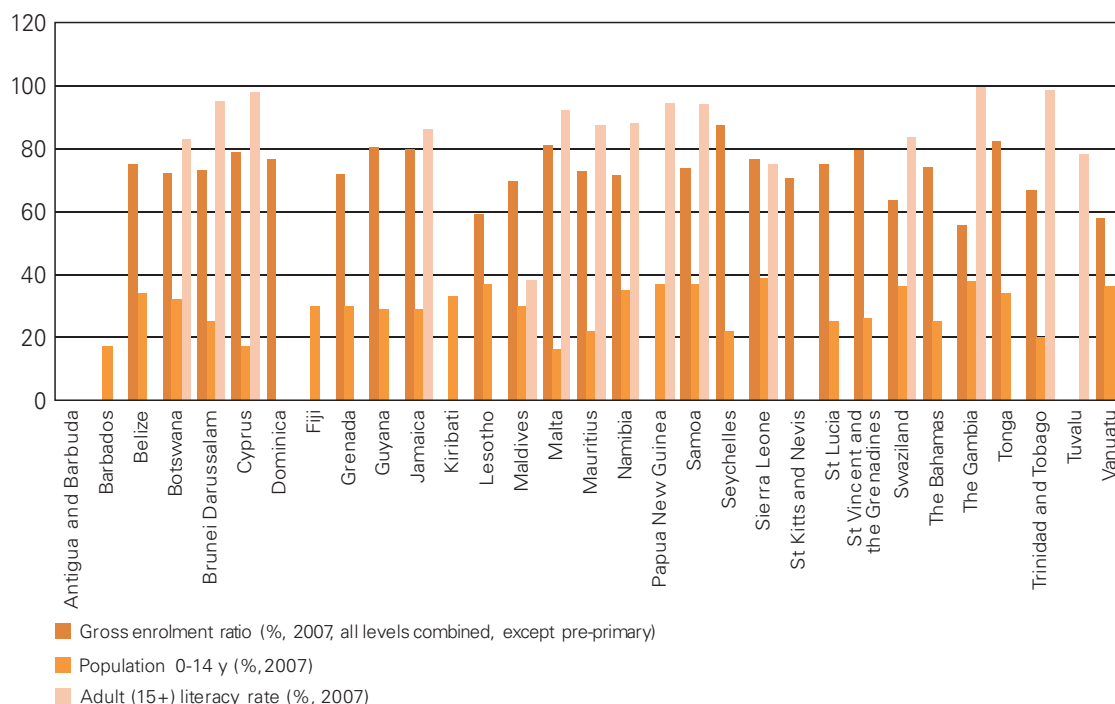
■ Gross enrolment ratio (%, 2007, all levels combined, except pre-primary)

■ Population 0-14 y (%, 2007)

■ Adult (15+) literacy rate (%, 2007)

Source: UNESCO, 2007
Data on gross enrolment is for 2007 with the following exceptions: Botswana (2006), Brunei Darussalam (2008), Guyana (2008), Malta (2005), Mauritius (2008), Namibia (2008), Samoa (2005), Saint Lucia (2008), Saint Vincent and the Grenadines (2005), and Tonga (2006). No gross enrolment data was available for Antigua and Barbuda, Barbados, Fiji, Kiribati, Papua New Guinea, Solomon Islands and Tuvalu. No data on youth population was available for Antigua and Barbuda, Dominica, Saint Kitts and Nevis, and Tuvalu. Data on adult literacy is for 2007 with the following exceptions: Brunei Darussalam (2008) and Malta (2005). No data on adult literacy was available for Antigua and Barbuda, Barbados, Belize, Dominica, Fiji, Grenada, Guyana, Kiribati, Lesotho, Seychelles, Solomon Islands, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, the Bahamas, Tonga and Vanuatu.

FIGURE 2.9 VUSSC OVERVIEW OF WORKERS' REMITTANCES, COMPENSATION OF EMPLOYEES AND MIGRANT TRANSFERS[1]
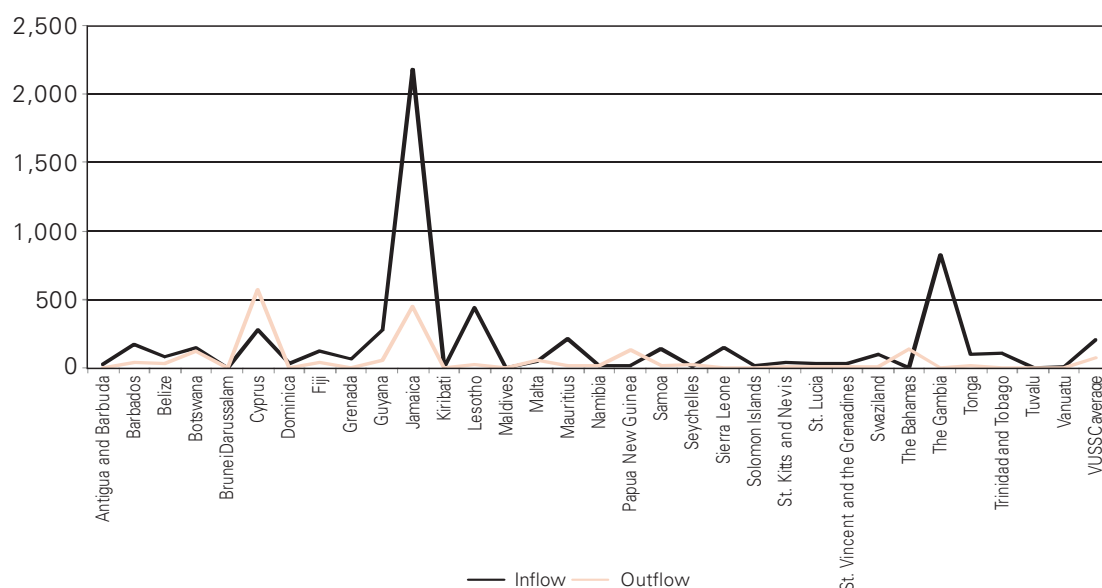
—— Inflow   —— Outflow

Based on World Bank, 2009
(1) 2008, USD million. Remittance data was not available for Brunei Darussalam, Kiribati, Maldives (outflow), Sierra Leone (outflow), the Bahamas (inflow), Comoros (outflow), Gambia (outflow) and Tuvalu. Update data is included for Fiji and Solomon Islands from World Bank 2011.

TABLE 2.4 REMITTANCE DISPARITIES AMONGST VUSSC MEMBER STATES

Country	Factor	
	Inflow exceeds outflow	Outflow exceeds inflow
Antigua and Barbuda	13	–
Dominica	181	–
Cyprus	–	2
Grenada	18	–
Lesotho	21	–
Mauritius	15	–
Papua New Guinea	–	10

Based on World Bank, 2009

The Transnational Qualifications Framework (TQF) developed for the Virtual University for Small States of the Commonwealth (VUSSC) is a reference system which links the national qualifications systems and frameworks in different states together, and aims to promote the credibility and reliability of qualifications developed by any of the national quality assurance agencies and providers involved in the VUSSC. Like the EQF, the TQF is meant to be a translation device making qualifications more readable, and hence aiming to contribute to a more mobile and flexible workforce and simplifying comparison of qualifications. According to the 2010 procedures and guidelines, the TQF encompasses adult basic education and training, vocational education and training and higher education although developments started initially from a small subset of qualifications as explained below.

In contrast to the two previous case studies (the EQF and SADCQF), the TQF is not limited to the geographical proximity of the participating countries as it comprises 32 countries spread out across the globe. It is however limited to a particular sector (as will be discussed below). In this sense the TQF is a truly transnational qualifications framework compared to the other case studies included in this report (see Figure 1.1 in Chapter 1 for an overview of the different types of qualifications frameworks that exist).

The common factor in the TQF is that all these countries are small states (most have populations of less than one million, Sierra Leone and Papua New Guinea are the exceptions) and belong to the Commonwealth set of nations. The total population of the 32 countries is low as can be expected at just over 32 million in 2007, while the average educational expenditure (as a percentage of GDP) was 6.2% in 2005. The average gross enrolment ratio was 73.0% across the countries, while the average adult literacy rate (15 years and older) was relatively high at 86.1% in 2007. Similar to the SADC region, the average youth population (0-14 years) is relatively high at 29.6% (in 2007). Mobility and migration issues are of paramount

importance in the small states as many are faced with severe skills shortages as a result of brain drain (also see Briguglio et al., 2006). The possibility of gaining credibility and being heard in the international community as a collective, rather than as individual small states has undoubtedly been a key factor in this association of 32 countries.

2.3.2 Description of the VUSSC Transnational Qualifications Framework

On request of Commonwealth Heads of State, the Commonwealth of Learning (COL) initiated the development of the VUSSC in 2003. Premised on a virtual mode for distance education, expected to improve access to educational opportunities, enhance the quality of teaching and reduce costs, the VUSSC used English as a common language when working across borders. In addition all participating VUSSC countries are small states that share at least some common challenges in the face of globalisation and the increased mobility of highly skilled professionals. The 29 participating VUSSC countries are located across the globe within at least six regional groupings (SADC, ECOWAS, COMESA, EU, Asia-Pacific and CARICOM).

The role of the Commonwealth of Learning in the initiative cannot be emphasised enough. Through its leadership, the development of course materials in small states took place as part of the VUSSC process, with an emphasis on the need for expertise to be shared between small states. With strong political support from small states and financial support from the William Flora and Hewlett Foundation and the Commonwealth Secretariat, the initial project was relatively successful and issues of transnational recognition of the courses soon became important (see West, 2007; West & Daniel, 2005 and 2007). In 2007 the South African Qualifications Authority was approached, based on the organisation's earlier work

with the Commonwealth Secretariat on teacher qualifications, and requested to lead an initiative to develop a concept document for a transnational qualifications framework. An international project team comprising experts from South Africa, Hong Kong, New Zealand, Canada and Samoa were identified and presented the draft document to senior officials of the 29 small states in Singapore in February 2008. The document was subsequently refined and made available to the participating countries (COL & SAQA, 2008).

According to the concept document the purpose of the TQF is premised on the requirement that mechanisms need to be created to support the comparison of qualifications and transfer of credits between small states for VUSSC qualifications. This limitation was imposed on the TQF for a number of reasons; the most significant was probably the need to limit the scope as a result of the limited resources available. As noted above, the VUSSC preceded the TQF, and was the reason why the TQF was being developed. Of course the more general applicability of the TQF was often discussed, more so the extent to which other qualifications offered in small states (i.e. outside of the VUSSC) could be more widely recognised through a transnational qualifications framework. Migration between small states was an important factor, as the TQF was seen as another mechanism to promote cross-border recognition of qualifications between the small states, but was not the most serious concern as several other mechanisms (such as bi- and multilateral initiatives) already existed. Of greater concern was the possibility of increased recognition of qualifications from small states in the developed world with often cited examples of the lack of recognition of professionals from small states, in the United Kingdom, Europe and United States. Through the TQF, an overarching system of levels and credits is envisaged that will act as a bridge between the national systems of small states, improve the comparison of qualifications and enhance mobility and lifelong learning (COL & SAQA, 2008).

The TQF is described as a qualifications framework that relates to qualifications frameworks on other levels, such as the TVET sectoral framework in Jamaica, national frameworks such as in Namibia, and to regional

qualifications frameworks such as the EQF. It is proposed that most TQF qualifications will form a subset of qualifications already registered elsewhere, although this does not exclude the development of 'unique' qualifications as part of the VUSSC process. Emphasis is placed on the need for all qualifications, including those developed independently for the VUSSC, to 'be registered on at least one national qualifications framework' (COL & SAQA, 2008, p. 99). Emphasis is placed on the TQF as translation instrument with no regulatory capacity, and hence, the need for TQF to rely on existing qualifications frameworks. The TQF is defined as:

> 'a translation instrument for the classification of VUSSC qualifications according to set criteria for specified levels of learning achieved, to improve credit transfer and promote common accreditation mechanisms between participating VUSSC countries' (COL & SAQA, 2008, p. 100).

The translational function of the TQF occurs on three levels: registration of qualifications, quality assurance criteria, and 'IT systems' that contain information. In the case of the registration of qualifications, the TQF translates the existing level and description of the qualification offered on a national or regional basis (and registered on the relevant national or regional qualifications framework), to the relevant TQF level and format. In the case where the qualification is not offered national or regionally, but only through the VUSSC, the qualification is registered only on the TQF. With respect to quality assurance criteria, the TQF translates the existing quality assurance criteria implemented on a national or regional basis (and prescribed within the relevant national or regional qualifications framework), to minimum transnational quality assurance criteria. In the case where the qualification is not offered national or regionally, or where no quality assurance is undertaken, the minimum transnational quality assurance criteria apply. With respect to IT systems, the TQF translates the information of learners, qualifications and providers on a national or regional basis (and located within the IT systems of the relevant national or regional qualifications framework), to the relevant TQF format and system.

THE POTENTIAL OF THE TRANSNATIONAL QUALIFICATIONS FRAMEWORK TO ASSIST SMALL STATES

While very varied in population, culture and geography, small states face many similar challenges. Through the VUSSC, cross-border linkages have been established that enable small states to assist one another in informal ways. 'Brain drain' is an often-cited challenge for small states. The development of the VUSSC has shown that the challenge of brain drain in small states involves not only the loss of skilled people, but also trying to ensure that citizens' qualifications are recognised when they work in other countries. Similarly, when foreign qualifications are presented for local recognition in small states, an extra burden is added to ministry systems that are already under multiple pressures. It became clear that the development of a transnational qualifications framework would add great value to VUSSC developments.

Transnational Qualifications Framework for the Virtual University for Small States of the Commonwealth

Concept document

May 2008

COMMONWEALTH of LEARNING
Learning for Development   SAQA

Source: Foreword by Sir John Daniel in the TQF concept document, May 2008
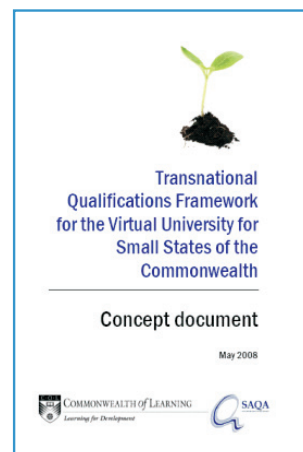
PUBLISHED LEVELS AND LEVEL DESCRIPTORS FOR THE VUSSC TRANSNATIONAL QUALIFICATIONS FRAMEWORK

	Descriptors
Level 10	Acquire and possess a systematic understanding of a substantial body of knowledge which is at the forefront of an academic discipline, field of study or area of professional practice
	Be able to create and interpret new knowledge at a most advanced frontier of a field of work or study through original and advanced research of a quality to satisfy peer review, extend the forefront of the discipline and merit publication
	Possess the most advanced and specialised skills and techniques to be able to conceptualise, design and implement a project for the generation of new knowledge or to solve critical problems or to refute or redefine existing knowledge
	Demonstrate authority, innovation, autonomy, integrity and personal responsibility to the production or development of innovative ideas or processes in the context of an academic discipline, field of study or area of professional practice
Level 9	Have a logical understanding of a body of highly specialised knowledge some of which is at the forefront of their academic discipline, field of study, or area of professional practice, as a basis for original thought and/or the conduct of research and/or enquiry
	Have a comprehensive understanding of the research skills and/or relevant established techniques applicable to their own research or to advanced scholarship that can be used to create and interpret knowledge
	Demonstrate originality in the application of knowledge to solve problems, together with a practical understanding of how knowledge can be managed to transform work or study
	Possess a conceptual understanding of how to analyse and critically evaluate current research in their academic discipline, field of study or work and to apply where appropriate to solve problems
Level 8	Have systematic, extensive and comparative knowledge of the key aspects of their academic discipline, field of study or work
	Possess an ability to deploy accurately established analytical tools and/or techniques and enquiry within their academic discipline, field of study or work
	Be able to use their knowledge, understanding and skills of a wide range of concepts, ideas and information to devise and sustain arguments and/or to solve problems
	Display a critical understanding of the uncertainty, ambiguity and limits of knowledge and how it is developed
	Possess the ability to manage their own learning and to make use of scholarly reviews and primary sources (e.g. refereed research articles and/or original materials appropriate to the discipline)
Level 7	Have advanced knowledge of a field of work or study, involving a critical understanding of the well-established principles and including an understanding of some advanced aspect(s) of their area(s) of their field of work or study
	Where appropriate, the application of those principles in an employment context
	Have an understanding of the limits of that knowledge and how this influences analysis and interpretation based on that knowledge
	Possess advanced skills, demonstrating mastery and innovation, required to solve complex and unpredictable problems in their specialised field of work or study
	Be able to manage complex technical or professional activities or projects, taking responsibility for decision making in unpredictable work or study contexts
Level 6	Possess an in-depth knowledge and critical understanding of the ideas, concepts and principles in their field of work or study
	Have knowledge of the methods of enquiry in the subject, and use a range of techniques to initiate and undertake critical analysis of information, proposing solutions to problems arising from that analysis
	Demonstrate an ability to critically evaluate and apply the appropriateness of different approaches to solving problems
	Apply those concepts and principles more widely
	Have an understanding of the limits of their knowledge, and how this influences analyses and interpretations
	Effectively communicate information, arguments and analysis, in a variety of forms, to specialist and non-specialist audiences, and deploy key techniques of the discipline effectively
	Have the qualities necessary for employment in situations requiring the exercise of personal responsibility and decision making

▶

Descriptors
Level 5 Have broad knowledge and understanding of the main underlying ideas, concepts and principles in a field of work or study
Be able to use their knowledge, understanding and skills to critically evaluate and determine appropriate methods and procedures to respond to a range of problems of a generally routine nature
Display qualities and transferable knowledge and skills necessary for employment in situations requiring the exercise of some personal responsibility
Communicate the results of their field of study or work accurately and reliably using a range of different modalities
Identify and articulate their own learning needs within defined contexts and undertake guided further learning in new areas
Level 4 Have a broad knowledge and understanding of the main underlying concepts and principles in a field of work or study
Demonstrate a basic understanding of the major theories, principles, ideas and concepts of their particular area of study
Be able to use different approaches to identify, evaluate and solve problems of a generally routine nature
Be able to use their knowledge, understanding of a particular subject area to communicate accurately and reliably with structured and coherent arguments
Use their knowledge, understanding and skills to undertake further learning within a structured and managed environment
Possess the qualities and transferable skills needed for employment in situations requiring the exercise of some personal responsibility
Level 3 Demonstrate a knowledge of basic concepts and principles in a field of work or study
Have command of analytical interpretation of information
Express informed judgment
Be able to display a range of known responses to familiar problems
Level 2 Demonstrate a narrow range of applied knowledge and basic comprehension in a field of work or study
Display a narrow range of skills in a field of work or study
Be able to use known solutions to familiar problems
Level 1 Demonstrate basic literacy and numeracy skills

Source: TQF Procedures and Guidelines published in April 2010.
These guidelines were published during the completion of this study and provide detailed information on purpose, governance and architecture, including QA implementation and descriptors of levels and qualification types.
See www.vussc.info/index.php?option=com_content&view=article&id=51&Itemid=50

The TQF is proposed as an enabling framework that will improve transparency through the development of a transnational registry of qualifications that will provide information on VUSSC qualifications following a set format, and in accordance with a broad agreed set of transnational qualifications criteria (to be developed at a later stage). The promotion of comparability of quality assurance mechanisms between participating VUSSC countries is proposed through the development of a set of broad transnational quality assurance criteria:

'In support of the vision, functions and core activities of the VUSSC, the TQF will not be a qualifications framework in the conventional more bureaucratic sense; instead it will be a "virtual" translation instrument housed within a web portal requiring minimal human and financial resources.' (COL & SAQA, 2008, p. 102)

Three aspects of the governance of the TQF are suggested: a virtual sub-committee (secretariat) within the broader VUSSC, a group of interlocutors to provide an oversight function, and a web portal located within the VUSSC and COL infrastructure. The TQF design excludes the accreditation of providers but includes the registration of qualifications: a qualification that meets the transnational qualifications criteria will be registered on the TQF and is referred to as a 'TQF registered qualification'. Any education and training provider within a participating VUSSC country that meets the broad quality-assurance criteria, and is accredited on a sectoral, national and/or regional level, will be able to offer such a registered qualification.

The proposed architecture of the TQF draws on the architectural features of the first generation of qualifications frameworks, which have been influential in the development of national frameworks around the world. The architecture also stands to benefit from the evolving thinking about competences, as reflected in the EQF. An important feature of the proposed TQF architecture is an attempt to map onto the existing system of small states of the Commonwealth. The main components of the TQF architecture are a possible 10 levels (although only levels 4 and 5 were initially developed), a set of level descriptors modelled on the

EQF descriptors, two qualification types (level 4 certificates and level 5 diplomas), and a credit system.

A Management Committee for the TQF was appointed in October 2008 comprising two representatives from each of the three main regions in which the 32 countries are located. The Management Committee organised three regional cluster meetings during 2009 in Africa, Asia-Pacific and the Caribbean, and has recently completed a consultation document for the TQF that will form the basis for implementation between 2010 and 2012. Members of the TQF Management Committee are in agreement that ministers need to sign a document to take ownership of the TQF and see the consultation document as a key mechanism through which endorsement by ministers can take place before implementation can start. Concurrently, work on course development within the VUSSC context has continued, as well as the development of a portal through which the materials can be accessed by small states. In 2009 the Commonwealth of Learning appointed an education specialist dedicated to the work of the VUSSC and the TQF. Funding for the immediate future well into 2011 has been ensured, but sustainability of the TQF remains a challenge.

Outcome methodologies are generally accepted and supported as most small states are moving in this direction. As in other regions of the world, the higher education sector has expressed some isolated concerns, while the TVET sector has been more accepting. The need for regional bodies (such as CARICOM and SADC) to get involved in these debates is expressed. The Commonwealth of Learning (and the VUSSC process) is also encouraged to promote the idea of learning outcomes as a way to establish standards.

The increased mobility of students in Commonwealth countries, more so from small states to larger and more developed countries, has been an area of concern. As a result, a key purpose of the VUSSC has been to try and offer a counterbalance in that individuals in small states would be able to find the most appropriate education and training opportunities within the grouping of small states, rather than being drawn outwards due to a lack of opportunities. The irony here is that the TQF as a translation tool for VUSSC qualifications, to some extent at least, counters this purpose as the enhanced recognition of VUSSC qualifications may lead to increased outward mobility and migration.

While it is acknowledged that TVET is a challenge in many small states, there is a concerted effort to avoid the TQF becoming a TVET-only framework, the more so because of the focus on higher education in other parts of the world and the limitations that will be imposed on the TQF if it does not accommodate these external dimensions. The unique context, such as issues related to small size, but also the similarities of small states, such as their education and training systems as Commonwealth countries, are recognised as important factors to consider in the TQF process. Generally the TQF process is regarded as having taken these factors into account, particularly through the emphasis on consultation and

representation. Despite the fact that the qualifications framework concept originates from mostly northern and more developed countries, the TQF is seen as a contextualised response to the challenges faced by the small states. The inclusion of non-formal and informal learning is however seen as limited.

According to the TQF Management Committee the TQF has been referenced against several existing qualifications frameworks (such as in New Zealand, Australia, South Africa and Europe) while Mauritius, Seychelles and Namibia have reportedly been referenced to the TQF. It is however evident that these referencing processes were mainly of a technical nature and fall well short of the broader interpretation of referencing being applied in the EQF context that views referencing as a social and political process to build mutual trust. Attempts by countries, regions and transnational initiatives outside of the EU to reference against the EQF have therefore become a reality that will have to be considered in the future.

The TQF is seen firstly as a translation instrument that will be able to classify VUSSC qualifications. In this regard it is important to note that no VUSSC qualifications exist at present as the emphasis in the VUSSC initiative has been on developing course materials, mainly for use in open and distance learning (ODL) modes, as opposed to qualifications. As much of this activity has preceded the TQF concept, and in fact lead to the need for a TQF in the first place, work will have to be done to develop qualifications based on the existing course materials. A key factor here is that the original motivation for the VUSSC was to create a mechanism through which small states would be able to share course materials through open and distance learning (which is a key focus area for the Commonwealth of Learning). This meant that at least three different routes can be followed to develop the course materials.

- Existing courses are shared between small states, e.g. where the Seychelles or Samoa have developed a maritime course, this course can be further developed and made available to all the other 28 small states with limited adaptation to the country-specific context.
- New courses (not available in any of the small states) can be developed on a collective basis.
- Course materials that exist outside of the small states can be obtained (purchased, or in some cases, used free of charge).

In all the examples the course materials are then offered by the small states (not by the VUSSC), but branded as VUSSC courses. In this regard it important to understand that the VUSSC, despite it being named as a 'virtual university', is in fact not a university. As explained in the TQF concept document (COL & SAQA, 2008) and other related documents, the VUSSC rather acts as a conduit or clearing house for courses, while the TQF is viewed as a repository of the courses offered in small states.

In order to improve recognition of the VUSSC courses the TQF is seen as a key mechanism, although it is agreed that this is a future objective that will require some time before it can be realised. As the TQF is a *qualifications*

framework it means that the course materials need to be further developed into qualifications using outcomes-based methodologies. As this realisation has set in, and the TQF concept has become clearer, the more recent efforts at developing new courses (using either of the routes discussed above) have taken these factors into account. Placing the TQF logo, also referred to as the 'seal of the VUSSC', on certificates is seen as a way to improve recognition and international credibility. However, unrealistic expectations of the impact of the TQF on the recognition and portability of qualifications of small states, in particular small universities located in small states (such as the University of Samoa), are noted as a major concern. It is argued that the lack of parity between different types of qualifications (e.g. those provided through distance education vs. those provided on a face-to-face basis) is something that will not necessarily be resolved through a qualifications framework.

It is acknowledged that the EQF has had a direct influence on the TQF, more so because the EQF is one of the more developed regional qualifications frameworks, but also because some small states in the VUSSC initiative are also European (e.g. Malta and Cyprus). The need for the TQF to 'match the standards' that the EQF will require is seen as a priority. The TQF Management Committee appointed in 2008 has played an important role in moving the TQF concept closer to an implementation stage. Through organising three regional cluster meetings (Africa and the Mediterranean, the Caribbean and Asia-Pacific), and developing a draft consultation document (to be finalised in 2010), the TQF Management Committee has been able to alleviate the strong dependence on the Commonwealth of Learning evident at the early stages of the project, however the role of the TQF Management Committee during implementation of the TQF remains unclear. The Commonwealth of Learning continues to play a facilitatory role as it supports the initiative through funding and logistical support. The appointment of a long-term expert dedicated to the VUSSC and TQF has also been an important step in building capacity and ensuring sustainability of the initiative.

The continued dependence of small states on financial and expertise support from outside and in particular from the Commonwealth of Learning for the success of the VUSSC and the TQF remains a concern to all involved. The Commonwealth of Learning has made several efforts to build capacity amongst the small states, and has been careful to clarify its role as facilitator. It is however clear at this developmental stage that the initiative is still far from being mature enough to allow for the Commonwealth of Learning's withdrawal. This was probably also the main reason to extend financial support to the initiative into 2011, but it seems improbable that the members of TQF would be able to support the further implementation of the initiative at that stage, without further assistance from outside.

Because the TQF is not limited to countries in geographical proximity it does not benefit directly from the conventions and agreements that exist within regions, such as in SADC (Arusha Convention and the SADC Protocol on Education and Training), EU (Lisbon Strategy),

the Caribbean (CARICOM Single Market and Economy [CSME]) and in South East Asia (the Framework Agreement on Services). For this reason the TQF will necessarily also be more influenced by global processes, such as the General Agreement on Trade in Services (GATS). For the same reason, credibility in sub-regions is viewed as more achievable.

Support for the establishment of a transnational agency to oversee the TQF is mixed. While some members of the TQF Management Committee are in support, it appears that the existing capacity (through the TQF Management Committee and Commonwealth of Learning staff) is generally viewed as sufficient. It is however noted that the relationship between the TQF Management Committee and VUSSC Management Committee can be improved. An important factor here is that new technologies, as embraced by the Commonwealth of Learning, are enabling much of the work to be done online without the need for numerous expensive meetings of people from various corners of the globe. Although this approach clearly has benefits, there are of course also disadvantages. The need to build trust between the small states is an integral component of the TQF, as is the case with EQF and SADCQF, and without the opportunity for social engagement this may be at threat.

The decision by some regional providers to remain outside of the TQF (e.g. the University of the South Pacific) is an important factor that will influence the sustainability of the VUSSC and the TQF. This may be partly due to reasons of competition as the VUSSC process could be seen as a threat in that it will provide free online course materials. The need for a political mandate from senior officials in small states is viewed as a necessary precondition for sustainability of the TQF. As mentioned before, the current approach by the TQF Management Committee has been to develop a consultation document that outlines implementation of the TQF over the period 2010 to 2012.

2.3.3 Level of development of the VUSSC Transnational Qualifications Framework

Continuous development is seen as an integral part of the TQF, although concerns have been raised that the extremely consultative and representative manner in which the TQF is being developed will make it slow to respond to changes that take place internationally. While there are no education and training providers involved in the TQF at this stage (keeping in mind that the VUSSC is not a provider), there are some reported cases of interest being expressed from the Canadian Association of Distance Education Providers, as well as from North America. The possibility of institutions from outside the small states viewing the VUSSC initiative as an opportunity to promote their courses (also see the third route described above) is therefore very real. As there is a tendency for developing countries to prefer qualifications from more developed countries this may work against the original objectives of the VUSSC as such qualifications become available to small states through the TQF process.

Although no qualifications have been registered on the TQF as yet, the course development through the VUSSC process, and the resulting extensive network that has been created, provides a foundation for the TQF to go forward. According to the TQF Management Committee individuals are already benefiting from the TQF through course development. Although employers are yet to become more aware of the TQF, interest has been expressed from other parts of the world (most recently from the UAE). The level of development of the TQF is described as being on the 'testing' and 'implementation' stages by individuals directly involved.

2.3.4 VUSSC Transnational Qualifications Framework–NQF interplay

NQF development amongst the 29 small states involved in the TQF varies greatly, but is generally still at the very early stages. Only Malta, Mauritius, Namibia and Samoa have moved into more advanced stages. As can be seen in **TABLE 2.5**, it is apparent that most countries (10) are at initial stage of development. The table also shows a trend towards enabling frameworks, also referred to as 'frameworks of communication'. Importantly though, the trend is not entirely as clear-cut as expected, as it inclines significantly toward comprehensiveness and inclusiveness, as well as toward increased regulation (COL & SAQA, 2008, p. 80).

Through the development of the TQF concept document, and the subsequent meeting of senior officials in Singapore in 2008, an opportunity was created for close scrutiny of NQF development in the small states as the TQF process unfolded. Using a web-based project management instrument (referred to as the VUSSC basecamp) ongoing deliberations and online information sharing has been made possible by the Commonwealth of Learning to all involved. Within the work of the TQF

TABLE 2.5 CURRENT STATUS OF THE NQF DEVELOPMENT IN VUSSC MEMBER STATES

Sector	Extent of NQF development				
	None	**Initial**	**In place**	**Advanced**	**Under review**
National vision and/or strategy for an NQF	Belize	Barbados Brunei Bahamas	Cyprus Guyana Mauritius Samoa Seychelles		Grenada Namibia Saint Kitts and Nevis
NQF legislation	Belize Saint Kitts and Nevis Bahamas	Barbados Brunei Cyprus Samoa Seychelles	Guyana Mauritius		Grenada Namibia
NQF-related policies	Belize	Barbados Brunei Cyprus Seychelles Bahamas	Guyana Mauritius		Grenada Namibia Samoa Saint Kitts and Nevis
NQF-related quality assurance structures	Belize	Barbados Brunei Cyprus Seychelles	Mauritius Bahamas		Grenada Namibia Samoa Saint Kitts and Nevis
Budgeting for NQF-related activities	Belize Brunei Saint Kitts and Nevis Bahamas	Barbados Cyprus Samoa	Guyana Mauritius Seychelles		Grenada Namibia
NQF-related qualifications development processes	Belize Bahamas	Barbados Brunei Cyprus Samoa Seychelles	Mauritius		Grenada Guyana Namibia Saint Kitts and Nevis

Source: COL & SAQA, 2008

Management Committee subsequent efforts were also made to ensure that regional perspectives and experiences were considered.

Capacity-building of the small states is seen as an integral part of the TQF process, but not to the point that NQFs are prioritised above the TQF; the two processes are seen as taking place in parallel. There is however no specific intention by the Commonwealth of Learning to get involved in NQF development in the small states. There is significant evidence that the TQF is encouraging countries to develop their own NQFs as it is seen as providing a foundation for the development of NQFs, and even regional qualifications frameworks (see for example TQFMC 2009).

For quality assurance the TQF relies entirely on the quality assurance mechanism in countries where courses originate and/or are offered. At most the TQF is viewed as a mechanism that can provide guidance to national quality assurance processes based on the existing UNESCO and other international guidelines on quality assurance. In certain cases, such as in some very small states where NQF development may not be pursued, and where very limited national quality assurance systems are in place the intention is to rely on regional bodies, or where no regional body is in place, the TQF Management Committee itself. Current discussions are underway to strengthen the TQF and to avoid an over-reliance on quality assurance within countries, including the existence of national and regional qualifications frameworks. The fact that very few small states have progressed beyond the initial stages of developing NQFs, while the EQF is the only regional qualifications framework that has moved to

implementation, does not bode well for the TQF's approach to quality assurance. In this regard the design of the proposed qualifications portal is viewed as crucial to mitigate this risk. The broader applicability (beyond the VUSSC and small states) of the portal to developing countries that are at varying stages of developing NQFs is also a key consideration.

2.4 CARIBBEAN VOCATIONAL QUALIFICATIONS FRAMEWORK

Member states (15): Antigua and Barbuda, Bahamas, Barbados, Belize, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Suriname, and Trinidad and Tobago.

2.4.1 The CARICOM context

CARICOM is a region of island states with relatively small populations and a history of strong migratory patterns out of the region to more developed parts of the world. The CARICOM regional population was just under 16.2 million in 2007, with a regional average educational expenditure (as percentage of GDP) of 5.6% in 2005. The CARICOM average gross enrolment ratio was 75.7% in 2007, while the average adult literacy rate (15 years and over) was high at 91.7% in the same year. The average youth population (0-14 years) was 27.0% in 2007 in CARICOM.

FIGURE 2.10 CARICOM POPULATION AND EDUCATION EXPENDITURE
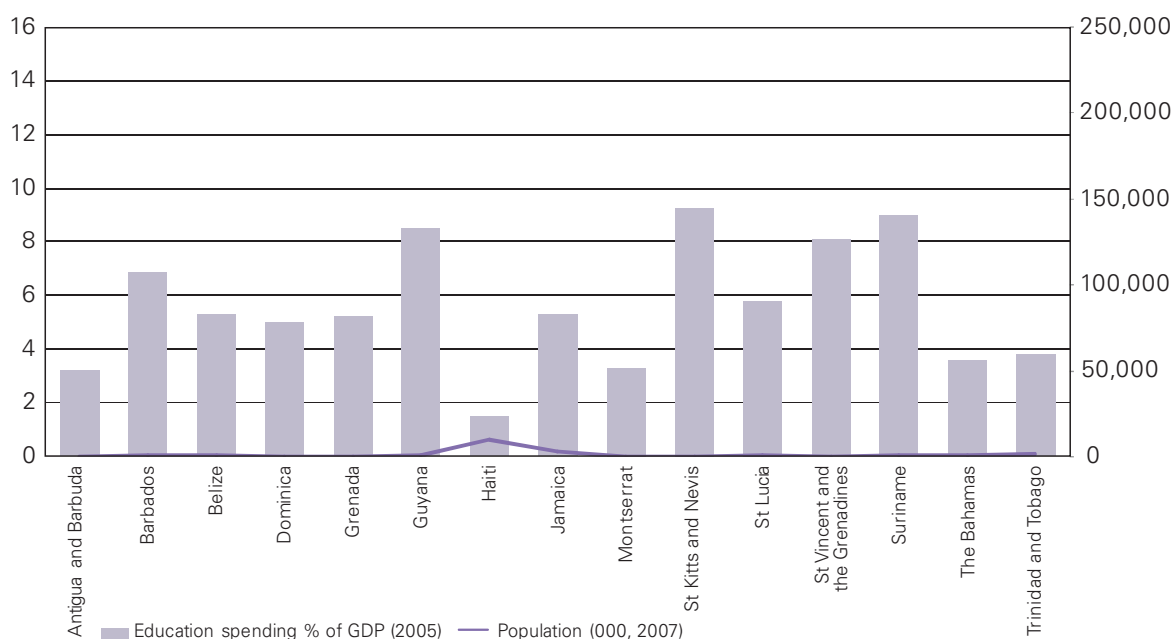
Education spending % of GDP (2005)   Population (000, 2007)

Source: UNESCO, 2007
No data on population was available for Antigua and Barbuda, Dominica, Montserrat and Saint Kitts and Nevis. Data on education expenditure is for 2007 with the following exceptions: Antigua and Barbuda (1999), Dominica (1999), Grenada (2003), Haiti (1990), Montserrat (2004), Suriname (1985), the Bahamas (2000) and Trinidad and Tobago (2000).

FIGURE 2.11 CARICOM GROSS ENROLMENT, YOUTH POPULATION AND ADULT LITERACY

- Gross enrolment ratio (%, 2007, all levels combined, except pre-primary)
- Population 0-14 y (%, 2007)
- Adult (15+) literacy rate (%, 2007)
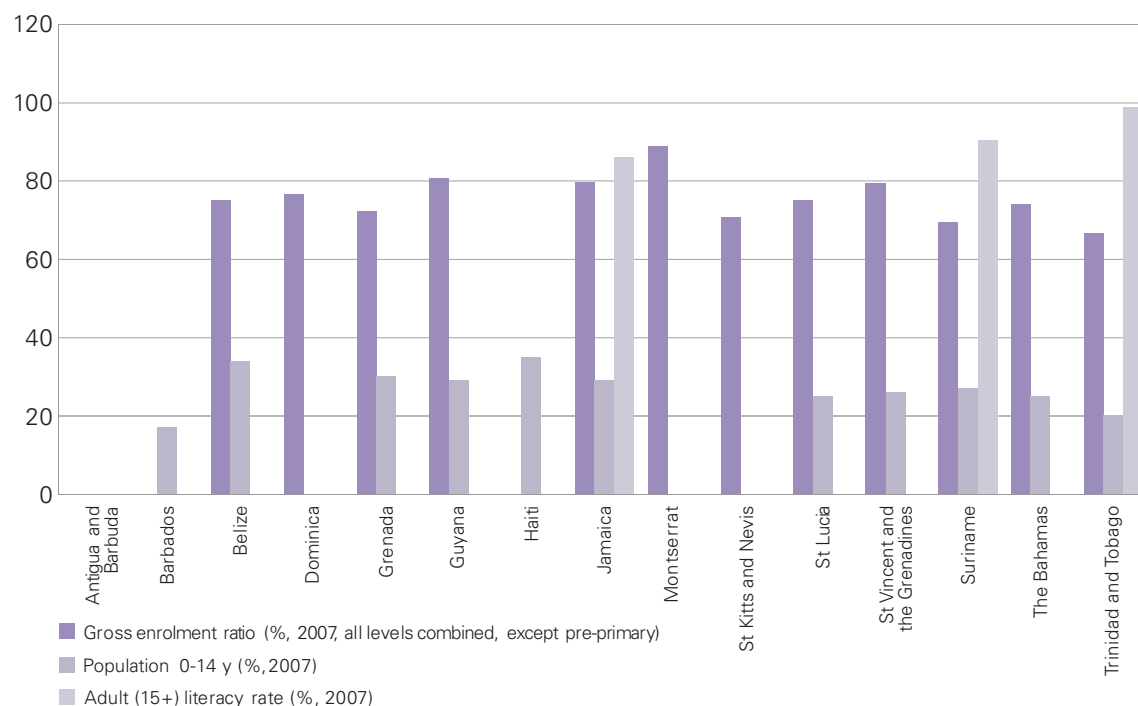
Source: UNESCO, 2007
Data on gross enrolment is for 2007 with the following exceptions: Guyana (2008), Saint Lucia (2008) and Saint Vincent and the Grenadines (2005). No data on gross enrolment was available for Antigua and Barbuda, Barbados and Haiti. No data on youth population was available for Antigua and Barbuda, Dominica, Montserrat and Saint Kitts and Nevis. Data on adult literacy was available only for Jamaica, Suriname and Trinidad and Tobago.

FIGURE 2.12 CARICOM OVERVIEW OF WORKERS' REMITTANCES, COMPENSATION OF EMPLOYEES AND MIGRANT TRANSFERS[1]
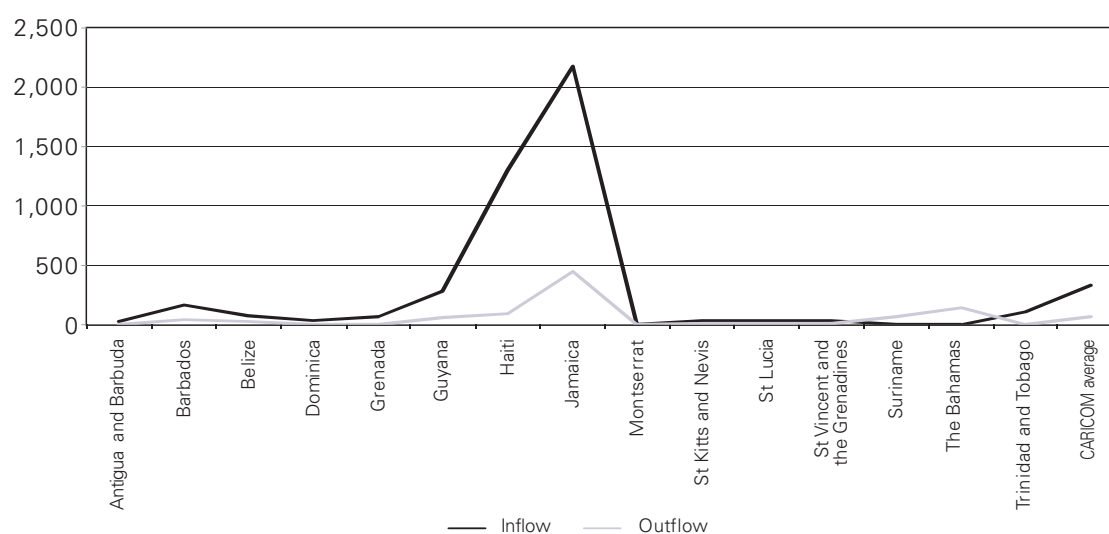
- Inflow
- Outflow

Based on World Bank, 2009
(1) 2008, USD million. Remittance data not available for Montserrat, the Bahamas (inflow) and Trinidad and Tobago (outflow).

Remittances within CARICOM total USD 4,336 million for inflow, and USD 912 million for outflow. As with the VUSSC TQF case study, Jamaica stands out with by far the highest inflow rate amongst the CARICOM member states (contributing 50% to the regional total), with Guyana the only other country with a significant inflow rate (if compared to the other CARICOM member states). As discussed before, Jamaica's outflow rate is much lower than its inflow rate, although this again represents 50% of the total inflow rate for CARICOM. The Bahamas also show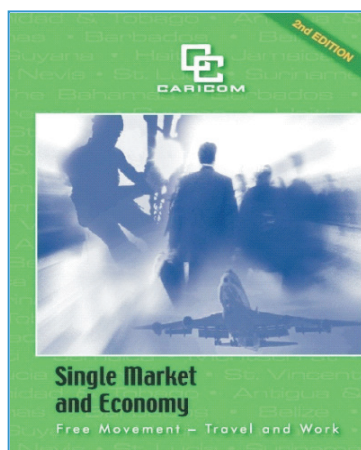s relatively high remittance outflow rates. As also mentioned before, the remittance rates suggest that many Jamaicans work abroad. **TABLE 2.6** includes examples of the disparities between remittance inflows and outflows in CARICOM.

2.4.2 Description of the CARICOM Vocational Qualifications Framework

The Caribbean Community (CARICOM) was established in 1973 to, amongst other objectives, improve standards of living and work, expand trade and economic relations with third states, enhance levels of international competitiveness, and achieve a greater measure of economic leverage (ILO, 2007a). The regional heads of government meeting in Grenada in 1989 decided to deepen integration of the CARICOM region through the establishment of the CARICOM Single Market and Economy (CSME). The main focus of the CSME is to provide greater opportunities for employment, investment, production and trade, competitive products, improved services, opportunities for study and work between CARICOM countries, as well as increased employment. The main elements to introduce free movement of labour include elimination of work permits in a phased approach to designated categories of wage earners (e.g. non-graduate teachers, nurses and artisans), mechanisms for equivalency and accreditation (mainly through the development of occupational standards and regional occupational certification and closer association between national training agencies), as well as the development of a skills register. The CSME was created in 2008 (CARICOM, 2008a) and has since had a direct effect on the labour market and recognition of qualifications.

An important factor to recognise in the CARICOM context is the homogenous nature of the region: all countries use English, most are island states (except for Belize, Guyana and Suriname), and all face challenges of distance, dependent economies and primary industries (Dunn-Smith, 2009).

Following agreement on a CARICOM Regional Strategy for TVET as early as 1990 (CANTA, undated), and the adoption of a competence model for TVET in 2002 by the CARICOM Council for Human and Social Development (COHSOD), the basis was laid for a CARICOM-wide TVET strategy based on the first NQFs in the region developed in Jamaica, Trinidad and Tobago, Barbados and Belize. At this stage the decision was made to structure vocational qualifications around five occupational levels. As noted by Dunn-Smith (2009), the threat of open borders, the need to improve the quality of the workforce required for modernisation, and the fact that enterprises required workers with much higher levels of education and training all contributed to the demand for a regional TVET qualifications framework that would, in theory, be able to:

■ improve progression routes;
■ modernise qualifications;
■ ensure parity of esteem between vocational and academic routes;
■ promote transparency, comparability, transferability and recognition of skills and qualifications.

TABLE 2.6 REMITTANCE DISPARITIES IN CARICOM

Country	Factor	
	Inflow exceeds outflow	**Outflow exceeds inflow**
Antigua and Barbuda	13	–
Dominica	181	–
Grenada	18	–
Jamaica	1 924	–
Trinidad	99	–
Belize	80	–
Barbados	149	–

Based on World Bank, 2009

The Caribbean Association of National Training Agencies (CANTA) was established in 2003 and endorsed by CARICOM as the implementation arm of the regional coordinating mechanism for TVET. The main agencies involved in the establishment of CANTA included the Human Employment and Resource Training Trust (HEART) of the National Training Agency of Jamaica, the TVET Council of Barbados, and the National Training Agency of Trinidad and Tobago. Currently, CANTA is composed of at least seven national training agencies and also includes TVET focal points in countries, as well as the ministries of education and labour. The key purpose of CANTA was to establish and govern a regional training and certification system, called the Caribbean Vocational Qualifications, to ensure standard and uniform delivery of competency-based training TVET within the CSME. As part of this mandate CANTA was to ensure acceptance and recognition of qualifications throughout the Caribbean and internationally. CANTA has also played an important role in the promotion and establishment of national training agencies through various capacity building initiatives that have encouraged collaboration between member states, including the development of guidelines for occupational standards and for accreditation. In addition, CANTA has attempted to increase the number of member states that access Caribbean Vocational Qualifications (CVQs), based on National Vocational Qualifications (NVQs) within member states. The fact that the Caribbean region has CANTA as a central coordinating agency is viewed as by many stakeholders as a very important and positive feature of the CVQ framework. This is despite the fact that the funding of CANTA is a major challenge. At present CANTA relies on subscription fees from member states, but this revenue is insufficient to establish a secretariat function.

The development of CVQs was preceded by regionally recognised school-leaving certificates developed by the Caribbean Examination Council (CXC). CVQs were largely successful in subject areas, but deemed inappropriate to the world of work where the competency approach has been preferred (Gregory, 2003), and hence lead to the development of CVQs (overseen by CANTA) from 2007 in a number of occupation areas: agriculture, business, communication, construction, energy, tourism, etc. CVQs can be obtained in schools, and on successful completion of all specified units, the CVQ certificate is awarded by the Caribbean Examination Council (CARICOM, 2007). The CVQ framework includes a common grid of skills levels for all qualifications:

- Level 1 – semi skilled worker,
- Level 2 – skilled/independent worker,
- Level 3 – supervisor/technician/instructor,
- Level 4 – manager/entrepreneur,
- Level 5 – executive professional.

To date a total of 672 CVQs have been awarded in two member states: Trinidad and Saint Kitts and Nevis between 2008 and 2009 (the majority of CVQs (97%) were awarded in Trinidad). Of the 672 CVQs awarded, 275 were awarded in 2008 and 397 in 2009. The main fields CVQs were awarded in were electrical installation, metal machining and beauty therapy (based on data provided by the Caribbean Examination Council, February 2010).

According to CANTA, the CVQ framework also allows for equivalencies to be established between elements of different qualifications, and facilitates the establishment of progression routes between different fields of study, general and vocational education, learning in initial and further education, qualifications obtained through formal and non-formal education and training. Furthermore, CANTA suggests that the CVQ framework attempts to show the level of qualifications, pathways for improving qualifications, recognition, worth and relevance of qualifications and includes standards developed through consensus process amongst social partners and other stakeholders. According to CANTA, a key feature of the CVQ qualifications framework is the credible, fair and transparent system of assessment of skills learner and competences gained, irrespective of how and where learning takes place.

The CVQ framework remains an ideal for the region but with very limited conceptual work underpinning its development. With the exception of reports by the ILO and the involvement of the majority of the CARICOM member states in the VUSSC TQF, information on NQF development in the Caribbean and the CVQ framework remains limited at best. Similar to the situation in SADC discussed earlier, capacity within the CARICOM secretariat remains a challenge, and despite the noble efforts of a few dedicated staff, will require significant support in the future. The continued role of CANTA also seems to be at risk as funding remains a challenge and as key staff leave the organisation.

The radical transformation where education is 'measured in terms of standards, learning outcomes and competencies' is recognised within the Caribbean (Gregory 2003:6). Recognising the existing expertise in the region, as well as the changed economic context, the challenges to TVET for human capital formation, decent work and employment, a more holistic outcomes-based secondary education curriculum is advocated. No specific resistance to the use of learning outcomes (which are linked to competency-based thinking) is reported, although it is emphasised that the region is still at a very early stage of development in this regard. The dominant historical paradigm in the Caribbean, as noted by Gregory (2003) of HEART, was one of a comparative advantage. In this paradigm it was recognised that none of the member states would be able to provide itself with the consumption requirements to ensure even the most basic standard of living, and hence each member state was encouraged to engage in economic activities for which they were best suited (in terms of resources, labour, etc.). Influenced by globalisation the paradigm has made room for another based on competitive advantage:

'[…] in terms of human capital formation through education and training that nurtures and promotes individual and societal creativity, innovation, learning,

CVQs WITHIN THE SCHOOL SYSTEM

What are the levels offered in schools?

■ Level 1 (Form 5) – entry-level: semi-skilled, apprentice, supervised beginning worker (secondary school leaver)

■ Level 2 (Form 6) – skilled worker: specialised technician, independent worker (licensed, etc) (college level)

What is the passing grade for a CVQ unit?

■ There is no pass mark in the CVQ programme. An individual pursuing the CVQ is deemed either competent or not yet competent in a unit, and will obtain a certificate attesting to competence in that unit.

What will the CVQ in schools offer the student?

■ Certification/accreditation re unit/units award, CVQ level 1/level 2

■ Every student, regardless of ability, will have the opportunity to be certified

■ A broad-based preparation for employment

■ Alternative route to further/higher education

■ Parallel standing with academic qualifications since CXC is the accreditation body

■ Will complement the academic track

■ Real world of work experience

■ Recognised and portable qualifications in CARICOM/Caribbean

■ Single Market and Economy (CSME)
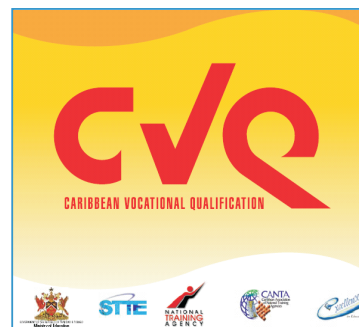
Source: Brochure developed by the Ministry of Education of Trinidad and Tobago, CANTA and other contributors. The brochure outlines the application of CVQs in the schooling system in the Caribbean.

entrepreneurship and a quality workforce to create and exploit select global market niches' (Gregory, 2003, p. 4).

This new paradigm has been realised through the CSME and continues to influence education and training in the region.

International benchmarking is clearly being considered in the design of the CVQ framework, but this is limited to a technical exercise, as no intention has been expressed for a more substantial social strategy to build mutual trust as is being followed in the European context. Regional standards are seen as a necessary route to improving the recognition of qualifications that is required as a result of the free movement of labour promoted through the establishment of the CSME. At the same time it is noted that very few people have acquired CVQ certificates at this stage as these have not been widely implemented yet. Although inter-country migration is a key issue within CARICOM, and has been addressed in part through the CVQ framework, international movement of individuals (in most cases, the highly skilled) is also a significant challenge. This factor may be partially responsible for the modest attempts at benchmarking the CVQ framework within the international context, as more substantial attempts, such as referencing of the CVQ framework to other frameworks internationally, may inadvertently contribute to increased outwards migration as a result of increased international recognition of Caribbean qualifications.

2.4.3 Level of development of the CARICOM Vocational Qualifications Framework

The level of development of the CVQ framework is clearly far ahead of many other transnational initiatives, as implementation is taking place on a number of levels. There is a definite move in the region from NVQs to CVQs, and while CVQ certification may still be limited, it is nonetheless underway.

2.4.4 CARICOM Vocational Qualifications Framework–NQF interplay

As far as could be determined there is no CARICOM-wide initiative to measure the progress of NQF development in member states. As many CARICOM member states are included in the TQF initiative, the following summary draws on the review that was undertaken in 2007/08 (COL & SAQA, 2008; SAQA, 2008):

■ no evidence of engagement (Dominica, Haiti, Saint Lucia, Saint Vincent and the Grenadines);

■ background work underway (e.g. Antigua and Barbuda, Bahamas, Barbados, Belize, Grenada, Guyana, Suriname, Trinidad and Tobago);

■ initial development (e.g. Saint Kitts and Nevis);

■ legislation passed, structures established, standards being developed, quality assurance underway, national information system developed (e.g. Jamaica).

It seems that in the CARICOM region there has not been a debate about the prioritisation of NQFs over the regional framework, as has happened in the SADC. It rather seems that in this case, the national and regional initiatives are taking place in tandem without any significant contestations. Some of the smaller member states will possibly not develop their own NQFs, but opt to rely on the regional process, or even on the support of a member state with an established quality assurance system and/or NQF. This rather seamless and unobstructed approach to the development of the CVQ framework seems to have been a key factor that has contributed to the relatively advanced level of development.

2.5 ASSOCIATION OF SOUTHEAST ASIAN NATIONS FRAMEWORK ARRANGEMENT

Member states (10): Brunei Darussalam, Cambodia, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Philippines, Singapore, Thailand and Vietnam.

2.5.1 The ASEAN context

Compared to the other case studies included in this research, ASEAN has the fewest countries involved (only 10), but still has a significant regional population total of 430.7 million as measured in 2007. The ASEAN regional average educational expenditure is the lowest of the five case studies at 3.2% (as a percentage of GDP in 2005), while the regional average gross enrolment ratio is also very low at 67.4% (in 2007). The ASEAN average adult literacy rate (15 years and older) was 86.1% in 2007. The regional average youth population (0-14 years) was 29.1% in 2007.

Mobility and migration appear to be more limited in ASEAN than the other regions included in this research, but are still a factor as professionals often move between Commonwealth countries, of which some ASEAN member states such as Malaysia and Singapore are also members. Cases of Malaysians moving into Vietnam, Cambodia and India are increasingly being reported.

Remittances within ASEAN total USD 36.9 million for inflow, and USD 8.8 million for outflow. The Philippines stands out with a very high inflow rate compared to the other ASEAN countries, contributing 51% to the total inflow rate for the region. In contrast, the Philippines' outflow rate is only 0.5% of the total regional outflow rate. Other countries with high inflow rates are Indonesia and Vietnam. Countries with relatively high inflow rates are Malaysia and Indonesia. The remittance trends suggest that many Philippine citizens work abroad. **TABLE 2.7** includes examples of the disparities between remittance inflows and outflows in ASEAN.

FIGURE 2.13 ASEAN POPULATION AND EDUCATION EXPENDITURE
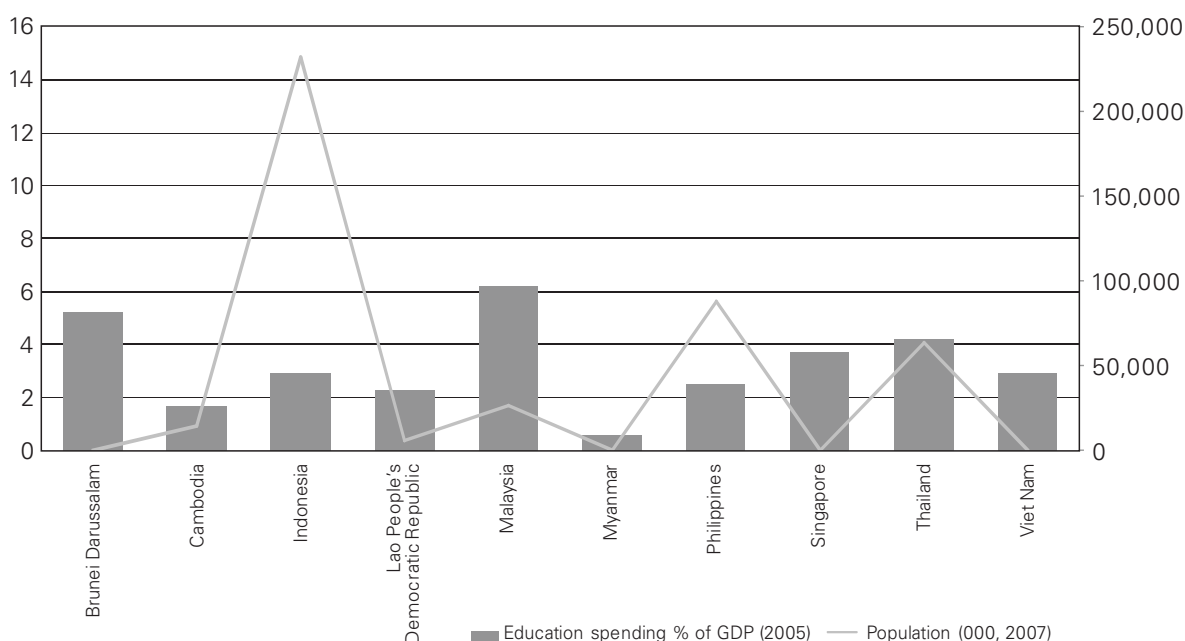
Education spending % of GDP (2005) ——— Population (000, 2007)

Source: UNESCO, 2007
No data on population was available for Myanmar, Singapore and Vietnam. Data on education expenditure is for 2007 with the following exceptions: Brunei Darussalam (2000), Cambodia (2004), Malaysia (2004), Myanmar (2000), Singapore (2001) and Vietnam (1995).

FIGURE 2.14 ASEAN GROSS ENROLMENT, YOUTH POPULATION AND ADULT LITERACY
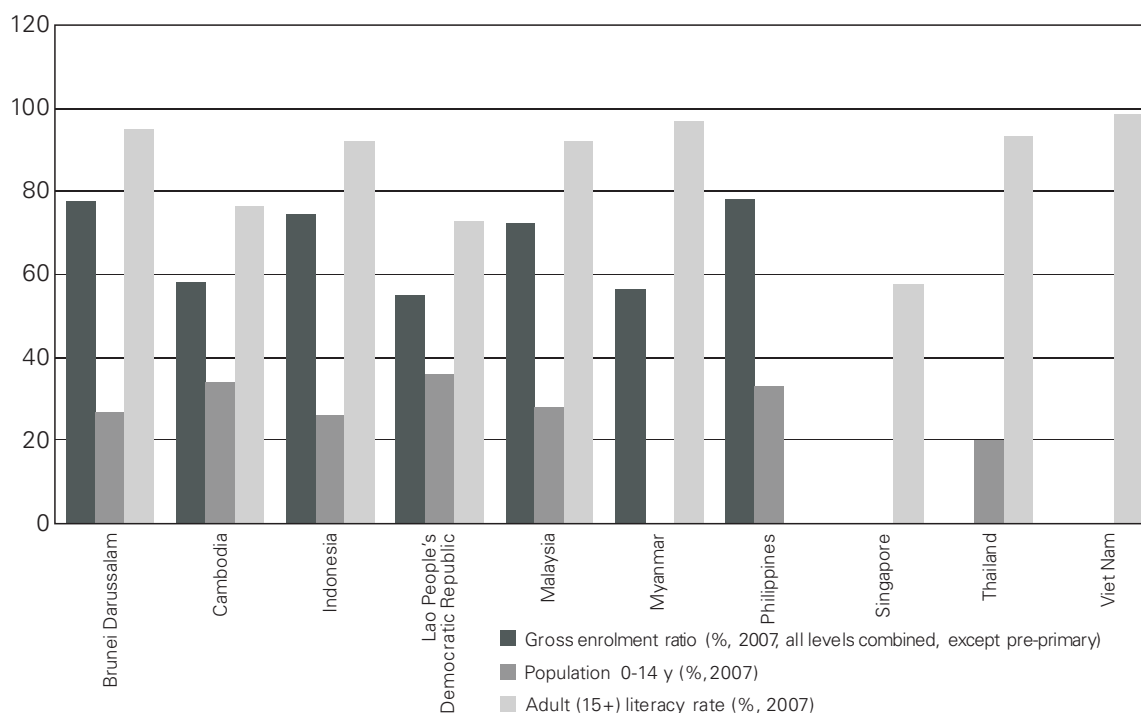
■ Gross enrolment ratio (%, 2007, all levels combined, except pre-primary)
■ Population 0-14 y (%, 2007)
■ Adult (15+) literacy rate (%, 2007)

Source: UNESCO, 2007
Data on gross enrolment is for 2007 with the following exceptions: Brunei Darussalam (2008), Malaysia (2006) and the Philippines (2006). No data on gross enrolment was available for Singapore, Thailand and Vietnam. No data on youth population was available for Myanmar, Singapore and Vietnam. Data on adult literacy is for 2007 with the following exceptions: Indonesia (2006) and Lao People's Democratic Republic (2005). No data on adult literacy was available for the Philippines.

FIGURE 2.15 ASEAN OVERVIEW OF WORKERS' REMITTANCES, COMPENSATION OF EMPLOYEES AND MIGRANT TRANSFERS[1]
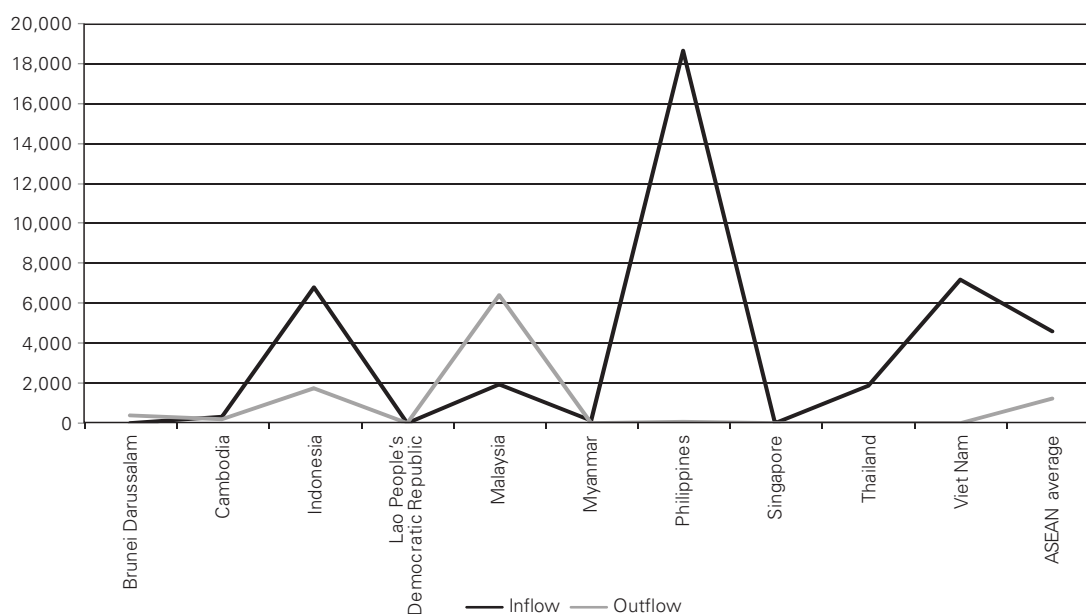
— Inflow   — Outflow

Based on World Bank, 2009
(1) 2008, USD million. No remittance data was available for Brunei Darussalam (2002), Singapore, Thailand and Vietnam (2002, 2005 & 2008).

TABLE 2.7 REMITTANCE DISPARITIES IN ASEAN

Country	Factor	
	Inflow exceeds outflow	Outflow exceeds inflow
Indonesia	4	–
Myanmar	5	–
Malaysia	–	3
Philippines	424	–

Based on World Bank, 2009

2.5.2 Description of the ASEAN Framework Agreement

The ASEAN Framework Agreement on Services was signed in 1995 by the ASEAN economic ministers at the Fifth ASEAN Summit in Thailand. This Framework Agreement was aimed at substantially eliminating restrictions to trade in services among ASEAN countries in order to improve efficiency and competitiveness, consistent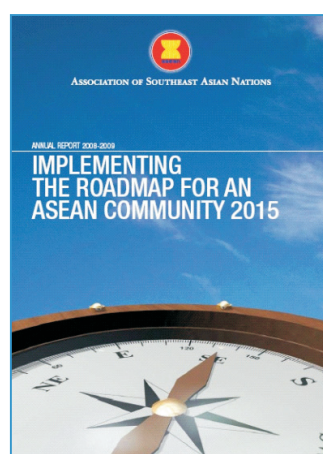 with the General Agreement on Trade in Services (GATS). The intention was to establish an ASEAN Economic Community in order to 'make ASEAN a single market and production base with free flow of goods, services, investment, skilled labour and freer flow of capital by 2020' (APEC, 2003, p. 1). Based on the Framework Agreement, seven sectors of importance to ASEAN were selected for services liberalisation, while Mutual Recognition Agreements (MRAs) for qualifications in major professional services were initiated to enable the qualifications of professional service suppliers to be mutually recognised by signatory member states.

In 2007 the ASEAN Economic Blueprint was signed which set out concrete steps to be taken to achieve a free flow of services by 2015, five years earlier than originally intended through the Framework Agreement. The blueprint emphasises the realisation of the ASEAN Economic Community, first called for in 2003, through multiple areas of cooperation, including the recognition of professional qualifications (ASEAN, 2007a). The blueprint called for MRAs that were under negotiation at the time, to be completed in addition to the MRA in engineering and MRA in nursing that had been completed in 2005 and 2006 respectively. As a result of the renewed impetus, five additional MRAs were concluded between 2007 and 2009 in the fields of architecture, surveying, medical practitioners, dental practitioners and accountancy.

Another important component of the blueprint was the creation of the free flow of skilled labour through 'harmonisation and standardisation' (ASEAN, 2007a, p. 18). In this case, enhanced cooperation between members of the ASEAN University Network to increase the mobility of staff and students was encouraged, as well as the development of core competences and qualifications required in priority service sectors.

The ASEAN Framework Arrangement for the Mutual Recognition of Surveying Qualifications was signed in 2007 by 10 ASEAN member countries as a broad framework wherein MRAs for surveying professionals could be developed between competent authorities (designated government regulatory bodies or their authorised agencies) in charge of regulating the practice of surveying services and registered/licensed surveyors. Key features of the MRA include (ASEAN, 2007b):

- The different nomenclature and requirements between ASEAN member countries are recognised.
- An applicant seeking recognition must have met the educational requirements in effect in the home country.
- The need for applicants to pass examinations designed to assure that they meet the requirements of the host country is recognised.
- The basis for recognition requirements is in accordance with the guidelines of the International Federation of Surveyors.

Considering the concept of a transnational qualifications framework as discussed in Chapter 1 of this report, it would be difficult to categorise the ASEAN Framework Arrangement as a transnational qualifications framework. At best the arrangement can be located in the pre-qualifications framework approaches that rely on bi- and multilateral agreements, and to some, on extant trade agreements. This relatively early stage of development does not mean that the Framework Arrangement will not at a later stage develop into a qualifications framework and it has therefore been included in this study. An important point to note here is that a similar situation exists in Europe where significant effort has been invested into the multilateral agreement on the recognition of professional qualifications. At present the EQF co-exists alongside these earlier agreements and it is unclear how these initiatives will evolve and whether they

can be integrated in the future. The main challenge in this regard is the very different approaches that underpin the two approaches: the EQF is based on outcomes, while the mutual recognition of professional qualifications is based on inputs. It is apparent that similar tensions could emerge within the ASEAN context in the future. Again, important to note is that in the cases of the SADCQF, the CVQF and the Commonwealth of Learning TQF, no parallel (or preceding) recognition framework existed. This point will be discussed further in Chapter 3 of this report.

The learning outcomes-based approach is not resisted in ASEAN, although some conceptual concerns are noted. The challenges and capacity building needed for redesigning qualifications is acknowledged, as well as the fact that such a transformation process will take time to be completed. Singapore (mainly VET) and Malaysia (outcomes set by central agencies) are singled out as two member states that have made some progress in moving towards learning outcomes, while few other countries seem to have made any significant progress in this regard.

The ASEAN region is closely associated with the Asia-Pacific region as many of the member states belong to both regions. Regional qualifications framework development in Asia-Pacific is being driven by the Asia-Pacific Quality Network (APQN) and Asia-Pacific Economic Cooperation (see APEC, 2009) based on the Brisbane Communiqué and is at a slightly more advanced stage than developments within ASEAN: work has been done in comparing NQFs between APEC countries and the idea of a regional qualifications framework is being discussed in public forums, most recently at conference held in Manila in October 2009 with the theme of harnessing regional qualifications frameworks for TVET. For pragmatic reasons the decision within this research project was to focus on ASEAN as a case study rather than APEC, but the influences are clearly evident and warrant further enquiry at a later stage.

It has been reported that an ASEAN Quality Network, similar to the APQN, has recently been established. The Malaysian Qualifications Authority has been identified to oversee a secretariat for the AQN, and the intention is to focus sharing and capacity building, while slowly building up understanding. The initiative is however still in its infancy. Influenced by international developments, the ASEAN universities network has been discussing credit transfer, but these discussions have yet to be taken up by quality assurance bodies within ASEAN. Considering the huge influence the Bologna higher education process had in Europe, this development within ASEAN is important if the region is going to move towards a regional qualifications framework.

At this stage in ASEAN (and to some extent also in APEC) the EQF is regarded as an important reference point for emerging NQFs. Possibly due to the early stage of development of NQFs in ASEAN, reports of actual referencing taking place were limited to Malaysia which supported the notion that referencing not be limited to the EQF, but is also done with other NQFs outside ASEAN, such as Australia, New Zealand and Scotland.

Good inter-country relations between ASEAN countries are reported despite the huge diversity within the region which includes: different education systems (following British, French or American traditions), different colonial backgrounds, as well as diverse populations (ranging from 390,000 in Brunei Darussalam to 231 million in Indonesia). Bi- and multilateral arrangements, such as the ASEAN Framework Agreement, constitute the dominant approach to the recognition of qualifications in the region and are viewed as an important basis on which future developments can be built. Even with the existence of some multilateral recognition arrangements (MRAs) within ASEAN several limitations on the recognition of qualifications exist, as countries are still functioning in a more inward-looking manner, focusing on their own interests. Initial moves to greater liberalisation are being mooted, but are still at a very early stage. Even in the case of Malaysia, foreign qualified professionals are still subject to local registration processes, including clauses such as Malaysian citizenship requirements which have not been amended to date. The importance of international accords for the recognition of professional qualifications (such as the Washington Accord for engineers) also features strongly in ASEAN.

Despite the very early stage of development, there is a realisation that the inclusion of a regional quality assurance dimension will be critically important. Evidence suggests that the Malaysian government is making strong commitments within the ASEAN Framework Agreement, but other member states seem to be delaying despite the gradual move within the region to greater liberalisation. The importance of mutual trust as prerequisite for a regional recognition process within ASEAN is acknowledged. In this regard the preference is for countries to work more directly with each other, rather than on the basis of an 'abstract framework'. A regional qualifications agency is not an option at this early stage as strengthening of the national systems is viewed as more important.

2.5.3 Level of development of the ASEAN Framework Agreement

The ASEAN regional qualifications framework is at a very early orientation/exploration stage of development and remains strongly reliant on a number of bi- and multilateral agreements that predate qualifications framework developments and are embodied in the ASEAN Framework Agreement. At this stage a regional qualifications framework has yet to be prioritised and does not even feature in the strategies of key regional role-players for the next few years.

2.5.4 ASEAN Framework Agreement–NQF interplay

Information on NQF development in ASEAN member states is limited and at varying stages. Secondary sources, such as APEC (2009) and COL & SAQA (2008) do

however provide some insight into the current state of NQFs within the ASEAN region:

- no evidence (Cambodia, Lao People's Democratic Republic, Myanmar, Vietnam);
- supports introduction but still at an early stage (e.g. Brunei Darussalam, Indonesia);
- in the process, expectations to be complete within the next year or two (e.g. Thailand [higher education only]);
- established (e.g. Malaysia, Philippines, Singapore [VET only]).

The Malaysian NQF, which includes only higher education at this stage (and is better described as an intra-national sectoral framework rather than an NQF), is one of the most advanced NQFs in the region, even though it has only been implemented since 2007 when it took over the role of two previous quality assurance bodies. The Malaysian NQF is viewed as a catalyst for NQFs within the region and is receiving numerous requests for internships and study visits by other member states. Amongst the other ASEAN countries some have not established quality assurance bodies, and have not started to develop NQFs.

The extreme differences in infrastructure, economic development and wide regional distribution in ASEAN (as compared to Europe) is viewed as serious limiting factors influencing not only NQF development in member states, but also the establishment of a regional qualifications framework. As a result NQF development within ASEAN can best be described as taking place in an uncoordinated manner, with some movement in key areas (such as on

professional qualifications), but with limited overall coherency. As some early moves are being made to benchmark emerging NQFs amongst ASEAN countries, the viability of an ASEAN regional qualifications framework is also being considered but this is at a very early stage and regarded as something that may take place only five years into the future. At present the strengthening of the national systems is viewed as a far more important priority in the region.

2.6 CONCLUDING COMMENTS

This chapter has presented a detailed overview of each of the five transnational qualifications framework case studies based on the conceptual framework described in Chapter 1 of the report. On a very broad level the case studies have proven useful to identify several similarities and differences in approaches across the five initiatives. From the case studies it is evident that the EQF and the CVQ Framework are the most advanced transnational qualifications frameworks, while developments within the ASEAN region are at a very early stage, and the SADCQF and the Commonwealth of Learning TQF fall somewhere in-between. The case studies have highlighted the range of complexities and diverse contexts of the regions wherein transnational qualifications frameworks are being developed internationally as they also clearly highlight the different development and implementation strategies followed in each case. The key findings from each of the case studies form the basis for the comparative analysis that is presented in the next chapter.

3. COMPARATIVE MATTERS

A comparison across the five case studies contained in this report gives some insight into cross-cutting issues that in various ways influence the development and implementation of transnational qualifications frameworks. Moreover the comparison allows us to consider the different models of transnational qualifications frameworks and the extent to which these frameworks are able to achieve the policy objectives associated with them.

As a first step **FIGURES 3.1, 3.2** and **3.3** provide insight into some of the contextual differences between the five case studies.

■   The most populous regions are the EU (576.2 million, including European Economic Area members and candidate countries), ASEAN (430.7 million) and SADC (257.4 million), while in comparison, CARICOM (16.2 million) and the VUSSC member states (32.3 million) have very low populations.

■   The average educational expenditure (as percentage of GDP) determined in 2005 is 5.5%. While there are some differences across the five case studies, most are above 5%, with the exception of ASEAN which is at 3.2%.

■   The average gross enrolment ratio across the case studies is 77.6% and does not differ greatly between the case studies (ranging from 65.8% in SADC, 73.0% for the VUSSC member states, 75.7% for CARICOM and 67.4% for ASEAN) with the exception of the EU which is much higher at 90.0%.

■   The average youth population (0-14 years) is 25.6%. Here again the EU is an exception with a low 15.5% compared to 36.1% in SADC, 29.6% across VUSSC countries, 27.0% in CARICOM and 29.1% in ASEAN.

■   The average adult literacy rate (15 years and older) across the five case studies is 88.3%, ranging between 78.0% for SADC, 86.1% for VUSSC countries, 86.1% for ASEAN, 91.7% for CARICOM and 98.0% for the EU.

■   The average workers' remittance (including compensation of employees and migrant transfers) across the five case studies is USD 1.786 million for inflow, which exceeds the average outflow rate of USD 973 million. ASEAN has the highest remittance inflow followed by the EU. SADC, VUSSC and CARICOM have significantly lower average inflow rates. The EU has the highest remittance outflow, followed by ASEAN. Here also, the average outflow rates for the other regions are much lower. The general trend is for remittance inflow to exceed outflow.
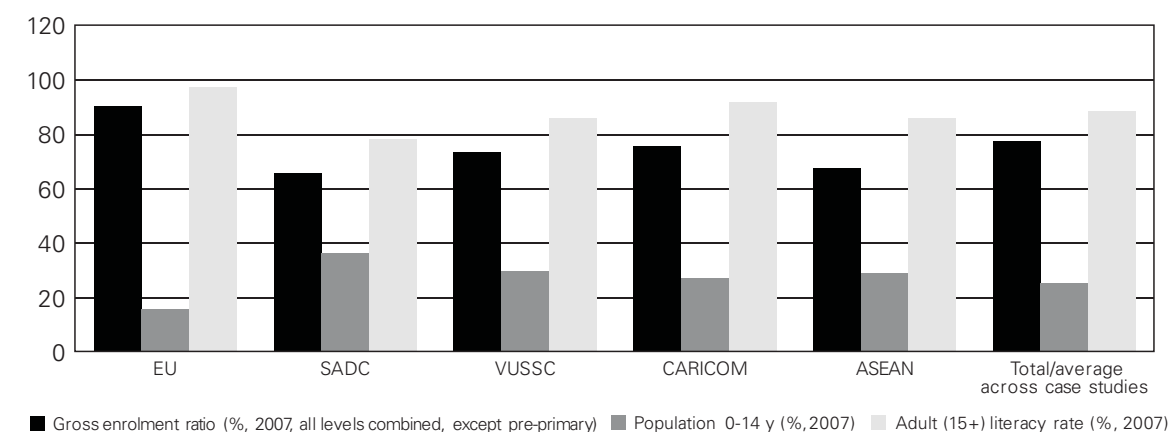
This data can be summarised as follows.

■   The EU is the most populous region of the five case studies, with an average educational expenditure, the highest gross enrolment ratio, an ageing population, a very high adult literacy rate, and significant migration activity.

■   SADC has approximately half the population of the EU, with average education expenditure, an average gross enrolment ratio, a very young population, a relatively high adult literacy rate, and relatively low migration activity with the exception of South Africa and Angola.

■   VUSSC member states have very low populations, spend an average amount on education, have an average gross enrolment ratio, a relatively young population, a relatively high adult literacy rate, and a higher remittance inflow than outflow.

■   CARICOM has a very low population, spends an average amount on education, has a relatively high gross enrolment ratio, a relatively young population, a high adult literacy rate, and also a higher remittance inflow than outflow, notably as a direct result of the contribution of Jamaica.

■   ASEAN is a very populous region, spends a relatively low amount on education, has an average gross enrolment ratio, a relatively young population, a high adult literacy rate, and considering the few member states in the region, a very high emigration rate.

3.1 MIGRATION IN THE EUROPEAN CONTEXT

Several European countries are considering measures that may reduce the inflows of new migrants. Italy recently passed a bill that criminalises illegal immigration. France and Italy are urging other EU leaders to tighten border patrolling, particularly along the Mediterranean Sea. The EU's Blue Card and move towards a points-based system is likely to favour skilled migrants at the cost of the unskilled, but some of the provisions such as high salary requirements for foreign workers could make entry difficult even for the highly educated. Together with the effect of the economic crisis, these restrictive immigration policies could adversely affect remittance flows to countries such as Poland, Romania and in particular the Republic of Moldova and Morocco which have a large number of migrants in Western Europe.

FIGURE 3.1 POPULATION AND EDUCATION EXPENDITURE ACROSS THE FIVE CASE STUDIES

Education spending % of GDP (2005) — Population (000, 2007)

Based on UNESCO, 2007
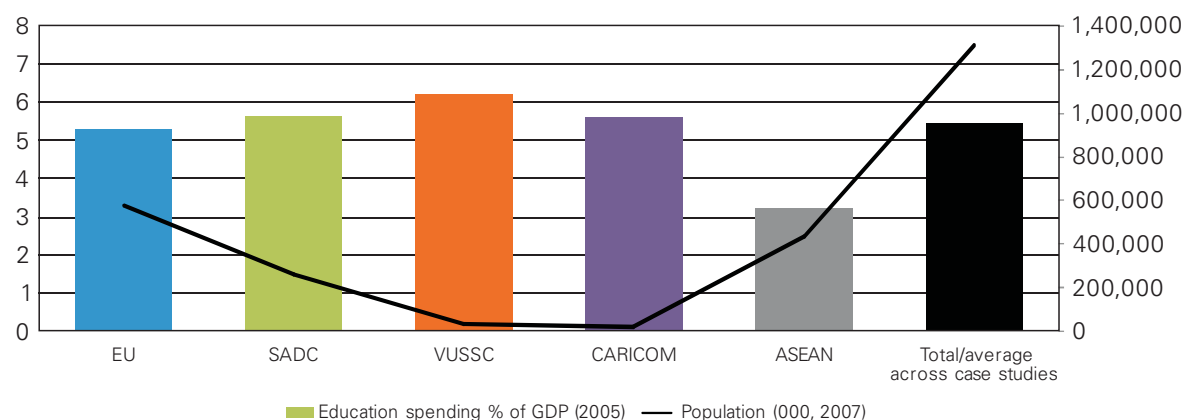
FIGURE 3.2 GROSS ENROLMENT, YOUTH POPULATION AND ADULT LITERACY ACROSS THE FIVE CASE STUDIES

■ Gross enrolment ratio (%, 2007, all levels combined, except pre-primary)   ■ Population 0-14 y (%, 2007)   ■ Adult (15+) literacy rate (%, 2007)

Based on UNESCO, 2007

FIGURE 3.3 WORKERS' REMITTANCES, COMPENSATION OF EMPLOYEES AND MIGRANT TRANSFERS ACROSS THE FIVE CASE STUDIES[1]

■ Average inflow   ■ Average outflow

Based on World Bank, 2009
(1) 2008, USD million.
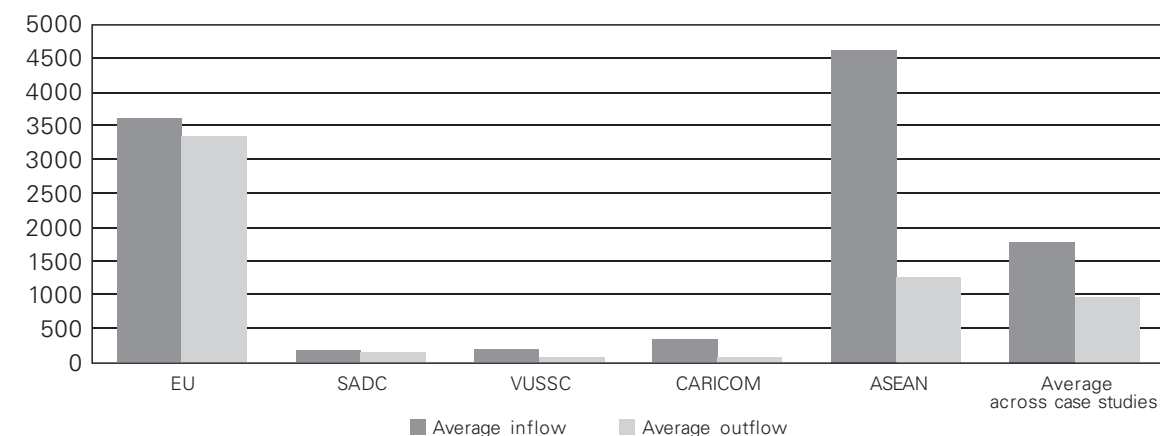
3.2 A COMPARISON OF NQF DEVELOPMENTS WITHIN THE TRANSNATIONAL QUALIFICATIONS FRAMEWORKS

The five case studies described in this report have shown that the level of development of NQFs varies greatly. **TABLE 3.1** is based on the levels as described in Chapter 2, but has been reinterpreted within the framework of the five stages as described in Chapter 1. As mentioned before, the stages are used as indicative only, and will vary as different measurements are done at different times. The proportion of member states, expressed as a percentage of the total number of member states at a particular level, is given also.

Observations from **TABLE 3.1** include the following:

■ The EQF has the greatest proportion of member states which are involved in NQF development (100%). The SADCQF (87%) and VUSSC TQF (81%) have high levels of NQF development, while the CVQ Framework (67%) and ASEAN Framework Agreement (60%) have fewer countries involved.
■ In the case of the EQF most NQFs are at the conceptual stage (58%), while a significant number are at the implementation stage (23%), either underway or completed.
■ The NQF profile for the SADCQF is very similar to that of the EQF: although the percentages vary slightly the

dominant level of NQFs is also at the conceptual stage (46%).
■ The VUSSC TQF shows a different profile, with most NQFs at the first orientation stage (38%), and the second most at the high level of implementation (35%) – a feature which highlights the significant diversity that exists in the case study, more so polarised around two extremes.
■ The profile of NQFs in the CVQ Framework is unique in that the majority of NQFs are still at very early stages (80% are at the orientation stage).
■ The profile of the ASEAN Framework Agreement is somewhat similar to that of the VUSSC TQF in that a significant proportion of NQFs are at the orientation stage (33%), and another large grouping exists at the other extreme of the scale at the implementation stage (50%).

FIGURE 3.4 illustrates the NQF profiles of each of the transnational qualifications frameworks.

A number of the countries included in the case studies are involved in more than one transnational qualifications framework (see the last row of **TABLE 3.1**). Key differences in this regard can be observed across the five case studies.

■ The EQF has only two countries (6%) involved in more than one transnational qualifications framework: Malta and Cyprus – also involved in the VUSSC TQF.
■ The SADCQF also has relatively few countries (six) involved in more than one transnational qualifications framework, but in contrast to the EQF, these countries represent a significant portion of the total countries

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TABLE 3.1 OVERVIEW OF THE STATE OF NQFs

	Transnational qualifications framework									
	EQF		SADCQF		VUSSC TQF		CVQF		ASEAN FA	
Stage of NQF development		(%)		(%)		(%)		(%)		(%)
Orientation	3	10	1	8	10	38	8	80	2	33
Conceptual	19	58	6	46	3	12	0	0	0	0
Testing	2	6	3	23	2	8	1	10	1	17
Implementation	7	23	2	15	9	35	1	10	3	50
Review	1	3	1	8	2	8	0	0	0	0
Total number of member states involved in NQF development	31[1]	100	13	87	26	81	10	67	6	60
Total number of member states[2]	31		15		32		15		10	
Number of member states involved in more than one of the transnational qualifications frameworks included in this research	2	6	6	40	21	66	12	80	0	0

(1) Belgium-Flanders and Belgium-Wallonia are indicated separately but counted as a single country in the total. The total includes EU member states, European Economic Area members and EU candidate countries.
(2) It is important to note that some countries are involved in more than one transnational qualifications framework (see last row).

(40%): Botswana, Lesotho, Mauritius, Namibia and Swaziland – all involved in the VUSSC TQF.

■ As expected the VUSSC TQF has a high proportion of countries (21 or 66%) involved in more than one transnational qualifications framework.

■ The trend in the CVQ Framework is interesting as almost all member states (12 out of 15, or 80%) are involved in two transnational qualifications frameworks: the CVQF and the VUSSC TQF.

■ For the ASEAN Framework Agreement there are no countries involved in more than one transnational qualifications framework. Although not factored into this study, the intention by the Asia-Pacific region to develop a regional qualifications framework may alter this situation in the future.

3.3 DIFFERENT TYPES OF TRANSNATIONAL QUALIFICATIONS FRAMEWORKS

The typology of transnational qualifications frameworks applied in this study proved helpful in distinguishing between the different types of frameworks broadly grouped below (see also Figure 1.1 in Chapter 1 of this report):

■ Frameworks which are developed across countries within the same geographical proximity:
  • limited to a sector – e.g. CVQ Framework
  • between NQFs – EQF, SADCQF and the ASEAN Framework Agreement.
■ Frameworks which are being developed across countries that are not in the same geographical proximity:
  • limited to a sector – e.g. VUSSC TQF
  • between NQFs – no examples exist at present.

At the same time it is acknowledged that this geographically-based typology is limited and provides only a narrow perspective in the different types of transnational qualifications frameworks that can be complemented by other perspectives that will be developed in the future.

Another feature that distinguishes different types of transnational qualifications frameworks is the different governance structures:

■ dedicated regional agency (e.g. CANTA in the case of the CVQ Framework);
■ dedicated staff compliment, usually in the form of a project team, but often also as a more formal structure within regional body (e.g. the unit within the European Commission responsible for the EQF);
■ core group of identified experts, usually on a volunteer basis and with limited financial and logistical support on a transnational basis, who also have other responsibilities, but have set time aside to develop the framework (e.g. the VUSSC TQF Management Committee and the Technical Committee on Certification and Accreditation in SADC);
■ no governance structure in the case of an emerging framework (e.g. in the case of the ASEAN Framework Agreement).

The extent to which transnational qualifications frameworks rely on fully functional NQFs is another important distinguishing factor. As pointed out earlier in this chapter, there is a direct relationship between the transnational qualifications frameworks and NQFs, but this relationship is not the same across the five case studies. In the case of the SADCQF the existence of functioning quality assurance systems and NQFs has been a prerequisite before the development of the regional qualifications framework could start. In the case of the EQF, the VUSSC TQF, and also the CVQ Framework the transnational process took place in parallel with national processes. In the case of the ASEAN Framework Agreement early indications suggest that a similar approach to SADC will be followed in order to first build capacity within member states. While it would be difficult

FIGURE 3.4 **STAGES OF NQF DEVELOPMENT ACROSS THE FIVE CASE STUDIES**
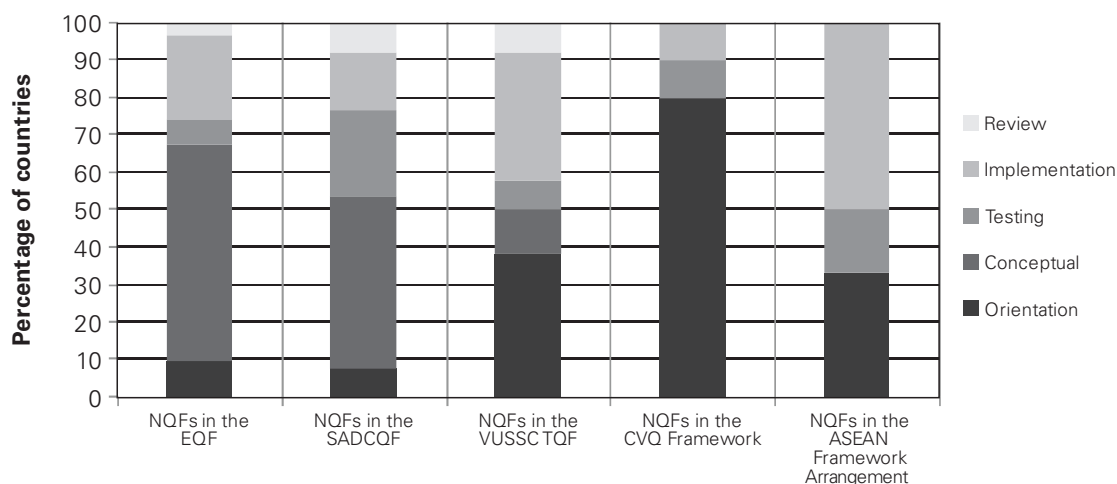
to compare the two approaches in terms of effectiveness as the contexts wherein the processes are taking place are very diverse, it is however evident that the parallel approach has proven to be more successful overall. In the case of the EQF this may be as a result of the participation of all member states in NQF development (100%) as well as the relatively high level of development within member states that have functional NQFs (58% are at the conceptual stage and 23% at the implementation stage. For the VUSSC TQF the situation is somewhat different, although there is also a high participation rate in NQF development amongst member states (81%) and a significant proportion of NQFs are at a high level of development (35% are at the implementation level), the proportion of NQFs at the lowest level is very high (38%). In contrast the CVQ framework shows much lower levels of participation in NQF development (67%) with the majority of member states at the lowest level of NQF development (80%).

TABLE 3.2 gives an overview of the main differences and similarities between the five case studies included in this research, and illustrates the huge diversity between the transnational qualifications frameworks included in the study. In this regard the EQF and SADCQF are probably the most similar, although the ageing population in Europe is an important contextual distinction.

3.4 SHIFT TO LEARNING OUTCOMES

The learning outcomes approach is seen as integral to the development of the five transnational qualifications frameworks in the study. Without exception, all 82 of the NQFs that fall within these transnational qualification frameworks are also being developed using a learning outcomes-based approach. There has, however, been some opposition to using outcomes. These are some of the common comments.

- Learning outcomes need to connect to the labour market and the needs of employers.
- There is a need to go beyond learning outcomes to also include aspects of curricula, teaching/pedagogy and assessment.
- The outcomes-based approach is more readily accepted in the TVET sector, less so in higher education.

It is also noted that learning outcomes are having a direct impact on the way in which qualifications recognition methodologies are developing (this point is taken up below in Section 3.7 on the recognition of qualifications).

TABLE 3.2 DIFFERENT TYPES OF TRANSNATIONAL QUALIFICATIONS FRAMEWORKS

	Transnational qualifications framework				
	EQF	SADCQF	VUSSC TQF	CVQF	ASEAN FA
Metaframe-work (M)/ transnational frameworks of common qualifications (C)	M	M	M	C	C
Total population incl. all member states (million)	576.2	257.4	32.3	16.2	430.7
Youth population (0-14) as % of total	15.5	36.1	29.6	27.0	29.1
Level of development of the transnational QF	7 Testing to implementation	1 to 2 Orientation to conceptual	4 to 5 Testing to implementation	4 to 5 Testing to implementation	1 Orientation
Geographical description/typology	Same proximity, between NQFs	Same proximity, between NQFs	Not in proximity, limited to a sector (VUSSC)	Same proximity, limited to a sector (VET)	Same proximity, between NQFs
Governance structure	Dedicated staff compliment within EC (DG EAC)	Core group of experts (TCCA)	Core group of experts (TQF MC)	Dedicated regional agency (CANTA)	No governance structure
Participation of member states in NQFs (%)	100	87	81	67	60
Main level(s) of NQFs in member states	2 Conceptual (58%)	2 Conceptual (46%)	1 & 4 Orientation (38%) & Implementation (35%)	1 Orientation (80%)	1 & 4 Orientation (50%) & Implementation (33%)

3.5 INTERNATIONAL INFLUENCES

Considering that qualifications framework development itself has become a global phenomenon in recent years, the international influences on the five transnational qualifications frameworks included in the study are extensive but also largely indistinguishable from other national and regional influences (these are listed at the end of this chapter). Migration, however, is increasingly becoming a major global factor that has directly influenced, and probably also accelerated, the development of qualifications frameworks across the world. Migration patterns change and are directly dependent on, amongst other things, economic conditions and political stability. Within the five case studies the current migration trends suggest that within the EU inter-country mobility has increased significantly, but also that a huge influx of people from outside the EU is taking place. On the other hand, increased outwards migration (brain drain) is acknowledged as a threat in SADC, CARICOM and the VUSSC member states. Regional mobility is also strong in CARICOM, but less so in SADC, where South Africa is the main recipient of migrants.

3.6 REFERENCING

As noted already, it is evident from the case studies that the referencing processes are for the most part in the early stages, while accompanying methodologies often remain underdeveloped, and skewed towards the technical rather than the social dimensions. Referencing is being pioneered within the EQF context where four countries (at the time of writing) have referenced their NQFs to the EQF, while the majority are expected to complete referencing by the end of 2011. Most of the remainder should do so by the end of 2012.

Outside the EQF, referencing is not well understood and runs the risk of becoming oversimplified and purely technical. Several reports of both upward (by sectoral and national qualifications frameworks) and peer (by other transnational qualifications frameworks) referencing to the EQF from outside the EU are noted. Referencing outside of the EQF is reported only within the VUSSC TQF process. The lessons learnt within the EQF referencing process over the next few years will be of great value to other transnational qualifications frameworks.


REFERENCING NATIONAL QUALIFICATIONS LEVELS TO THE EQF: CRITERIA AND PROCEDURES

- The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process, including the National Coordination Point, are clearly determined and published by the competent public authorities.

- There is a clear and demonstrable link between the qualifications levels in the national qualifications framework or system and the level descriptors of the EQF.

- The national framework or qualifications system and its qualifications are based on the principle and objective of learning outcomes and linked to arrangements for validation of non-formal and informal learning and, where these exist, to credit systems.

- The procedures for inclusion of qualifications in the national qualifications framework or for describing the place of qualifications in the national qualifications system are transparent.

- The national quality assurance system(s) for education and training refer(s) to the national qualifications framework or system and are consistent with the relevant European principles and guidelines.

The referencing process shall include the stated agreement of the relevant quality assurance bodies.

- The referencing process shall involve international experts.

- The competent national body or bodies shall certify the referencing of the national framework or system with the EQF. One comprehensive report, setting out the referencing and the evidence supporting it shall be published by the competent national bodies, including the National Coordination Point, and shall address separately each of the criteria.

- The official EQF platform shall maintain a public listing of member states that have confirmed that they have completed the referencing process, including links to completed referencing reports.

- Following the referencing process, and in line with the timelines set in the Recommendation, all new qualification certificates, diplomas and Europass documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate EQF level.

Source: Report on the referencing of the Malta Qualifications Framework to the EQF, August 2009
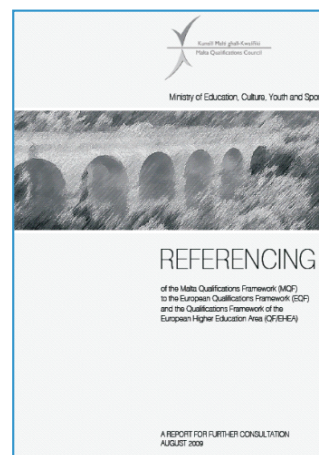
3.7 INCREASED RECOGNITION AND CREDIBILITY OF QUALIFICATIONS

The extent to which transnational qualifications frameworks contribute to the increased recognition and credibility of qualifications has been a key research question in this study. Evidence from the case studies suggest that while significant expectations exist in this regard, it is still too early to make any meaningful conclusion. It is however evident that qualifications frameworks in general have brought about new forms of recognition beyond the more traditional routes based on unilateral, mutual recognition agreements (MRAs), and trade agreements. Through qualifications frameworks an increased emphasis is being placed on transparency, currency and portability facilitated through the use of outcomes-based learning. This new 'technology' that is being introduced through qualifications frameworks is at odds with the more traditional routes that are by and large time-based and inflexible. In this regard the existence of the EQF and the EU directive for the recognition of professional qualifications is a case in point. A similar situation may arise in the ASEAN context as the current ASEAN Framework Arrangement is overtaken by regional qualifications framework development in the future.

Attempts at improving transparency through a distinction between comparability and equivalence of qualifications made in the SADC context, are important in developing the new outcomes-based methodologies for the recognition of qualifications.
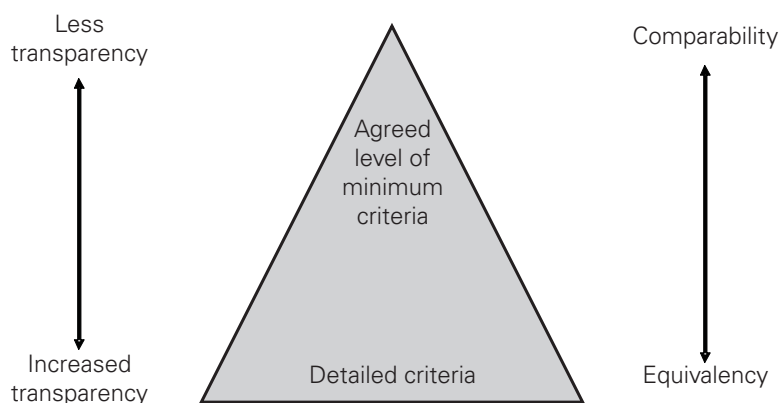
■ *Comparability* is seen as a higher order process determining the face value of qualifications by using a set format and criteria.
■ *Equivalency* is seen as determining the extent to which qualifications are the same, also using a format and criteria, but in this case requiring a measure akin to international curriculum standards.

In order to judge the claims of comparability, it is argued that it is important to first gauge the meanings of three key terms surrounding this key construct, which are sometimes (wrongly) used interchangeably (Keevy and Jansen, 2010).

■ *Transparency* is the degree to which the value of qualifications can be identified and compared in education, training, the workplace and other contexts. It is the degree of explicitness about the meaning of a qualification (outcomes, content, levels, standards, awards). It implies the exchange of information about qualifications in an accessible way within and outside the country of award. When transparency is achieved, it is possible to compare the value and content of qualifications at national and international level.
■ *Recognition* is the formal or legal specifications that a qualification must meet in order to be accepted (recognised) as fulfilling the (transparently) set standards, such as are often defined for the professions. Such recognition can be mutual and automatic where two or more states agree upon, for example qualifications achieved or the minimum conditions of training being met, as is often the case for doctors and nurses.
■ *Comparability* is the comparison of one qualification with another, based, most often, on a common format or instrument – such as comparability tables – that enables the 'face value' of a qualification to be established. The act of comparing enables judgments to be made about the equivalence (sameness) of qualifications.

The greater the transparency with which a qualification is presented, the easier it is to compare one qualification with another, and the more reliable the system of recognition by which a qualification is accepted by the state, professions or an individual. Transparency is seen as a necessary condition for claims about comparability, but these two constructs are not the same. So too, recognition can be achieved without the necessity of detailed comparison - for example through legal agreements between institutions or nations that a medical degree from one context will be deemed to be equivalent in standing to a medical degree from another content.

FIGURE 3.5 TRANSPARENCY OF QUALIFICATIONS

Less transparency

Increased transparency

Agreed level of minimum criteria

Detailed criteria

Comparability

Equivalency

Source: Keevy & Jansen, 2010

The view that the recognition of qualifications will be improved through collaborative efforts is strongly evident in at least three of the case studies: SADCQF, VUSSC TQF and CVQF. Evidence to support this view is limited at best, but is very much in line with similar collaborative efforts within regions to improve economic competitiveness (see for example Gregory, 2003). There is no doubt that the two 'smaller' transnational qualifications frameworks included in this study, the CVQF and VUSSC TQF, have premised their entire projects on this principle of 'strength in numbers' as several mentions are made of the improved recognition of qualifications through for example, placing the 'seal of the VUSSC' on qualifications offered by providers in small states of the Commonwealth. If in future, evidence suggests the contrary, or even only shows very modest impact, the effect on these initiatives will be extremely detrimental.

Closely linked to the increase in migration internationally, and the continued efforts to recognise qualifications through new technologies, is the function of the evaluation of foreign qualifications (also referred to as credential evaluation) which is located in national information centres (NICs) and competent recognition authorities (CRAs) across the world. With the exception of a handful of countries in the SADC region (Namibia, South Africa and the Seychelles) and New Zealand, this function has remained largely outside of qualifications frameworks. This is an interesting phenomena that is caused by at least two main factors: firstly, credential evaluation methodologies remain traditional and time-based, and have not engaged in any substantial way with outcomes-based thinking introduced through qualifications frameworks, arguably due to the increased demands such a change would impose on the agencies; secondly, it is evident that credential evaluation remains strongly influenced by political shifts within countries and even regions, often as a result of migration trends, and can be easily manipulated if the methodologies employed are less transparent and dictated by bi- and multilateral agreements, MRAs, trade agreements and even international accords, rather than a demonstration of competence.

3.8 SUSTAINABILITY AND GOVERNANCE

As noted earlier, at least four different governance structures for transnational qualifications frameworks can be identified amongst the case studies: a dedicated regional agency, a dedicated staff compliment, a core group of identified experts, and at the most extreme, an absence of any governance structure. From the available evidence it is difficult to make any substantial conclusion on the impact of any of the four approaches on the sustainability of the particular framework. What is however clear is that some form of governance is required and that very limited, if any, progress will take place until a governance structure is in place; this is illustrated in the ASEAN Framework Agreement context. Where a dedicated regional agency is established (such as CANTA in the Caribbean, as well as the proposed SADCF Qualifications Agency) funding is always a challenge and will have a direct influence on the ability of the agency to perform its functions effectively. The diversified and decentralised approach followed in the EQF context (through the European Commission structures, the EQF Advisory Group, national coordination points, working groups and supporting agencies such as Cedefop and the ETF) has proven to be very effective, and while the different contexts in the other case studies dictate that the same approach will not necessarily be suitable outside the EU, stands out as an example of good practice that warrants closer scrutiny.

The role of established regional bodies, such as the European Commission, the SADC Secretariat, the CARICOM Secretariat and the ASEAN Secretariat, are critically important for the success of transnational qualifications frameworks. Severe capacity constraints within these agencies, with the exception of the European Commission, have however hampered progress and emphasise the need for a more diversified approach such as is being followed in the EU context. The case studies confirm that only a coordinated effort that involves a range of stakeholders and role-players, in many cases on a

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LINKING CREDENTIAL EVALUATION AND LIFELONG LEARNING

One part of the Bologna Declaration involves the international recognition of certificates and grades. As explained before, many agreements have been made already about the recognition of credentials. However, due to the educational developments described above, the practice of international credential evaluation has become too limited. In a society where mobility and lifelong learning are at the forefront, it is an anachronism to only evaluate formal qualifications. However, credential evaluators do not have the tools yet to evaluate the outcomes of non-formal and informal learning. Transparency instruments, such as the Diploma Supplement, do give extra information but only limited to the level of the formal educational processes. There is a need to shift the focus from evaluating educational processes to evaluating the outcomes of educational processes, e.g. defined in terms of competences. This need is also acknowledged by the ENIC and NARIC networks. A more competency-based assessment and recognition methodology will offer a solution for people who lost disposal of their credentials, who obtained their credentials a very long time ago, or who have gained learning experiences which cannot be included in a credential evaluation according to the current system (non-recognised forms of learning). An (internationally accepted) system for recognising competences would therefore be important for facilitating lifelong learning. Credential evaluation will be a part of this system, but is not the same. The development of such a method has high priority on the agenda of the ENIC and NARIC networks.

Source: Discussion paper prepared by the Netherlands Centre for International Recognition and Certification

voluntary basis and/or sponsored by national governments, has any meaningful impact.

The continued dependence on donor funding in less developed regions remains problematic. Perhaps member countries need to determine respective tasks and priorities in ensuring sustainability for their frameworks.

An agreed political mandate from member states is another significant factor that affects sustainability. Here again, the progress with the EQF in recent years serves as a good example where development and implementation could only be accelerated after the EQF was formally adopted by the EU in 2008. In CARICOM a similar mandate was given through the Regional Strategy for TVET as early as 1990, while in SADC the Protocol on Education and Training was agreed to in 1997. In this regard a transnational qualifications framework developed outside a region, such as the VUSSC TQF, will be at a disadvantage.

3.9 LEVEL OF DEVELOPMENT

Current evidence suggests that the level of development of the EQF is located between the testing and implementation stages. The EQF has gained wide acceptance throughout Europe, but it is too early to judge its impact on learners, employers and providers. Plans to complete referencing of NQFs to the EQF as well as alignment of certification by 2012, will no doubt contribute significantly to the impact of the EQF. Sectoral initiatives within the EQF also represent an important factor and while some of these may have preceded the EQF, there has been a clear alignment to the EQF in the past few years. Collectively these sectoral initiatives, together with ongoing work on ECVET, Europass and Bologna have become key drivers in European education and training systems as the momentum continues to increase. Awareness of the EQF outside Europe (that is, the external dimension of the EQF) is also increasing at a rapid pace. As one of the strongest economic areas of the world the continued migration of qualified individuals towards Europe will continue, and will prompt countries and regions outside Europe to benchmark against the EQF in order to promote the recognition of their qualifications. Whether such benchmarking will be purely technical, or more focused on building mutual trust as proposed within the referencing methodology, remains to be seen.

The level of development of the SADCQF is best seen as being between the orientation and conceptual stages despite the extended period over which the idea has been promoted. The more recent move to develop a qualifications portal will in all probability move the level of development to a testing stage, but this is still under discussion. Here also, the involvement of sectoral initiatives (such as hairdressing and food security) will be vital to ensure a more coherent system is developed in the years to come. The role of South Africa in the SADCQF process will continue to be crucial, as will the broader location of the SADCQF within African-wide processes developed by the African Union and NEPAD

(The New Partnership for Africa's Development). The contestations relating to the prioritisation of the development of NQFs in SADC has had a significant impact on the slow progress within the region.

The level of the VUSSC TQF is between the testing and implementation stages. While similar to the EQF in this regard, the VUSSC TQF is far behind the EQF when it comes to levels of awareness and acceptance. At this stage the development of the VUSSC TQF is taking place without the explicit mandate of the most senior officials in the small states, and stands the risk of failing to launch as a result of political influences. On the positive side, the development of a wide range of course materials and the limitations imposed on the TQF as a sectoral transnational qualifications framework for VUSSC qualifications only, bode well for sustainability in the long run.

As noted in Chapter 2, the Caribbean Vocational Qualifications Framework, as a sectoral transnational qualifications framework is far advanced when compared to the other frameworks included in this study. The agreed move from National Vocational Qualifications (NVQs) to Caribbean Vocation Qualifications (CVQs) is a substantial step towards implementation, while the establishment of the Caribbean Association of National Training Agencies (CANTA) to oversee implementation of the CVQs is also a significant step; that is despite the concerns of the sustainability of CANTA that have been raised recently. The CVQ Framework is small if compared to the much larger contexts in which the EQF, the SADCQF and the ASEAN Framework Agreement are being implemented, but it has nonetheless been able to make significant progress: the population in CARICOM is 16.2 million while in the EU and SADC the populations are 576.2 million and 257.4 million respectively.

The ASEAN Framework Arrangement is at an orientation stage and is the least developed of the five transnational qualifications frameworks studied. To be more specific, the ASEAN Framework Agreement is better described as a bilateral arrangement or recognition framework of the type that existed in some other regions before qualifications frameworks were being developed. There are indications that the region is moving towards an outcomes-based system, and there are some initial talks of a regional qualifications frameworks, but these are at a very early stage.

3.10 INTERPLAY BETWEEN TRANSNATIONAL QUALIFICATIONS FRAMEWORKS AND NQFs

The main differences and similarities between transnational qualifications frameworks and NQFs can be grouped as follows.

- *Purpose*: the purpose of transnational frameworks often includes mapping and translation functions, while NQFs attempt to build links between different

sub-systems and sectors. Intra-national frameworks focus on coherence within a particular sector.

- *Scope*: intra-national frameworks are mostly unified in scope and attempt to cover all aspects of the particular sector. NQFs on the other hand range in scope, where some include all sectors within the country, and others only certain sectors. Here it is useful to distinguish between education sectors (such as higher education, VET and general education) and economic sectors (such as construction, manufacturing, etc.). Transnational frameworks, specifically regional qualifications frameworks are similar to NQFs in the extent to which the sectors included can vary. The more extreme versions of transnational frameworks are more inclined to be limited to a particular sector to be more manageable.

- *Prescriptiveness*: intra-national frameworks are usually more prescriptive (also referred to as tighter). NQFs range in their prescriptiveness depending on the specific country context, while transnational frameworks are very loose (see the earlier discussion on meta-frameworks).
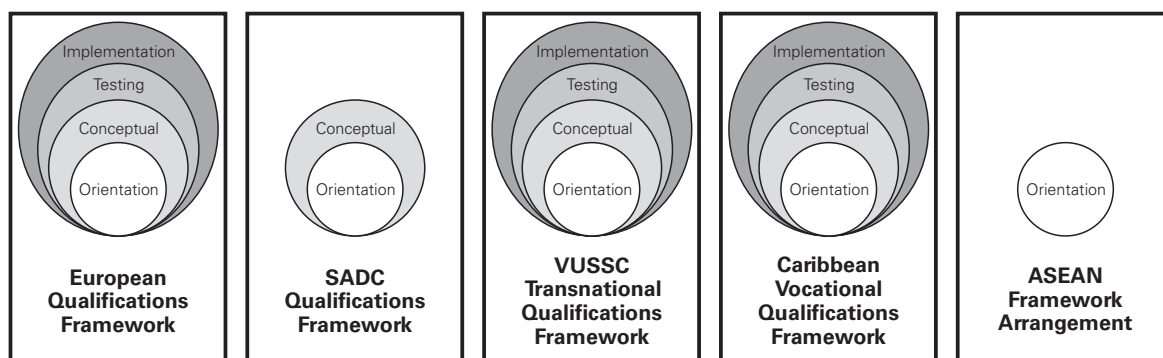
The mutual interdependence between transnational qualifications frameworks and NQFs is evident across all five case studies, but not always to the same extent. In the EU context, where all member states are developing NQFs and where 58% already have NQFs at the conceptual stage (see Tables 3.1 and 3.2), and where on first sight a seemingly synchronised parallel development of the EQF and NQFs is taking place, the coming two years will show if the ambitious timescales to reference all these frameworks to the EQF can be implemented. Important contributing factors are the extensive involvement of countries within the EQF process (through amongst others, the national coordination points and working groups), the development of the EQF as a 'reference framework', and the structured and systematic approach to capacity building, peer learning and direct support to member states with regard to NQF development, that is despite the diverse EU context wherein four first generation qualification frameworks (Scotland, England, Ireland and France) are being developed alongside some 22 other NQFs at varying stages of development.

In SADC the parallel development of the SADCQF and NQFs has been particularly problematic. Despite such intentions being expressed, and despite the presence of the South African NQF as a strong first generation NQF, the SADCQF process became tied down in the prioritisation debate. The decision to postpone the development of the SADCQF in 2005, and rather prioritise the development of quality assurance systems (as precursors to NQFs) has had a very negative impact on the region. Considering the available evidence when comparing the other case studies in this research, it is not evident that the prioritisation of NQFs on a regional basis has any improved impact on the level of NQFs than when the two processes take place in parallel. On the contrary, evidence suggests that the parallel approach benefits both the transnational process and increased NQF development within the member states as their involvement in the transnational process rather creates more opportunities for peer learning and capacity building that would not have been possible otherwise.

The VUSSC TQF is a unique example as it represents the only known transnational initiative that is being developed outside the confines of geographical proximity. While this does also cause some specific challenges, it is clear that the parallel development of NQFs and the VUSSC TQF is well accepted. In this regard it is important to note that most VUSSC member states (21 or 66%) are also involved in other transnational developments, more specifically in their own regional processes. These 21 small states, many with limited resources to start with, have to balance their involvement in two transnational processes as well as the development of their own NQFs. The wider involvement does also bring some benefits as they benefit from the support of a regional body (CARICOM, SADC and the European Commission) as well as from the Commonwealth of Learning. As a result, nine of the 32 (35%) member states have NQFs that are already at the implementation stage.

The majority (80%) of the member states involved in the Caribbean Vocations Qualifications Framework are also part of the VUSSC TQF. With this involvement come both advantages and disadvantages as outlined above. The relatively high level of development of the CVQ

LEVEL OF DEVELOPMENT OF THE FIVE CASE STUDIES

European Qualifications Framework	SADC Qualifications Framework	VUSSC Transnational Qualifications Framework	Caribbean Vocational Qualifications Framework	ASEAN Framework Arrangement
Implementation / Testing / Conceptual / Orientation	Conceptual / Orientation	Implementation / Testing / Conceptual / Orientation	Implementation / Testing / Conceptual / Orientation	Orientation

Framework seems to have outpaced the level of development of NQFs in the member states as most (80%) are still at the orientation stage. The fact that some of the very small member states may opt not to develop NQFs at all is important and will require a careful consideration of alternative models, including the direct application of the regional model and assistance from member states with established NQFs.

The ASEAN Framework Arrangement is probably best described as a predecessor to a transnational qualifications framework in the region, which is a process that has yet to start in any meaningful way. At this stage the focus is on NQFs and capacity building within the member states as the regional process is viewed as a future objective. The pitfall to avoid here is for the ASEAN process to follow a similar route to that in SADC, where the increased inward focus on national priorities resulted in several delays in the regional process. The presence of more developed NQF in the ASEAN region, such as the Malaysian NQF, is a positive factor.

The interplay between transnational qualifications frameworks and NQFs depends on the level of development of the NQFs. First generation NQFs (which are all at least in the implementation stage, some are even in the review stage), which include South Africa in SADC, and Scotland, Ireland, England and France in the EU, were all established before the first transnational qualifications frameworks, and have clearly had a strong influence on the way in which the regional qualifications frameworks in the EU and SADC have been designed. Second and third generation NQFs on the other hand have been implemented together with the first transnational qualifications frameworks, or in many cases, as a direct result of them. The initial influence of the more regulatory prescriptive approaches of the first generation NQFs, have gradually made way for the looser (less regulatory) and linked (sector-specific approaches are accommodated) approaches prevalent in the third generation of NQFs, arguably as a result of the looser approaches followed in the EQF, SADCQF and CVQF.

Another factor that influences interplay is the extent to which the member states within a specific transnational qualifications framework have developed NQFs. Different scenarios exist: in some instances, like the EU, all member states are working towards NQFs, and the regional qualifications framework becomes a logical and complementary process. At the other extreme fewer countries may be involved in NQF development (e.g. in ASEAN) which may result in a lack of urgency to develop a regional qualifications framework.

3.11 KEY FINDINGS FROM A COMPARISON OF THE FIVE CASE STUDIES

This comparative chapter of the report has highlighted the huge diversity not only across the five case studies, but also between the member states within each. Considering the findings as presented within each of the

sub-sections, it soon becomes evident that there is no recipe for successful development of a transnational qualifications framework within these diverse conditions. Some broad overarching factors that have a direct influence on the development and implementation of transnational qualifications frameworks can however be identified and are listed below.

1. The main demographic factor that influences transnational qualifications framework development is **migration/mobility**, which in turn, is directly linked to population size, level of economic development, and to some extent, also the average age of the population. For both inward migration (brain gain) and outward migration (brain drain) there is an expectation that qualifications frameworks will contribute significantly to mobility and the recognition of qualifications. In the case where excessive inward migration is a viewed as a threat, qualifications frameworks are sometimes regarded as potential regulatory or gate-keeping mechanisms.

2. The shift to a **learning outcomes** approach is important to qualifications framework development and requires significant adaptation on the country and sectoral levels. With the exception of isolated concerns that outcomes need to be better connected to the labour market, and that the value of pedagogy should not be disregarded, the outcomes-based approach is mainstreamed without significant contestation throughout the five case studies.

3. The extent to which transnational qualifications frameworks contribute to the increased **recognition** of qualifications internationally is yet to be determined. Great expectations of increased recognition exist across the five case studies, but evidence at the level of employers and individuals to support such claims remain very limited. This may be due to the relatively short period in which the transnational qualifications frameworks included in this study have been implemented (the EQF since 2005, the SADCQF since 2005, the VUSSC TQF since 2007, the CVQF since 2003, and the ASEAN Framework Agreement since 2007), but remains true.

4. A common view is held amongst many developing countries is that through **collaborative attempts**, in this case through the development of transnational qualifications frameworks such as the CVQF and VUSSC TQF, their ability to compete internationally and gain increased recognition of qualifications will be improved. In this case also evidence to support this view is very limited and still needs to be tested as national and transnational qualifications systems mature.

5. While evidence of increased recognition may be wanting, there is overwhelming evidence that qualifications frameworks in general, including also transnational qualifications frameworks, are influencing existing **recognition methodologies** through an increased focus on demonstrable competence, transparency, currency and portability. The incompatibility between the outcomes-based approach within the qualifications frameworks, and

the time-based approaches in the traditional recognition methodologies (such as unilateral and multilateral recognition agreements), is an issue that will have to be addressed in the future. Related to this issue is the change in function required within credential evaluation agencies internationally.

6. Although harmonisation is not an explicit purpose of transnational qualifications frameworks, with the exception of the SADCQF, it appears inevitable that some form of **convergence** will take place over time.

7. Instances where the majority of member states are involved in NQF development seem to benefit the broader transnational process and mitigate the risk of contestations relating to the prioritisation of NQFs and the transnational qualifications framework. Evidence does however suggest that the two processes, NQF development and the transnational qualifications framework development should preferably happen **simultaneously** as the interplay between the processes is valuable in both directions, in fact resulting in increased development on both levels.

8. The level of development of **NQFs** within the transnational qualifications framework seem to have **limited impact** on the overall progress of the framework, although the inclusion of one or more further developed NQFs (often first generation) does have a significant positive impact. The perception that the wisdom and experiences of NQFs can be translated to transnational qualifications frameworks is however challenged and sends an important warning to regions that are basing their frameworks directly on the experiences of the NQFs within the region. There is however conclusive evidence that the interplay between NQFs and transnational qualifications frameworks exists on a number of levels, and influence both the NQFs and the transnational qualifications frameworks.

9. **Quality assurance** is a crucial dimension of transnational qualifications frameworks, but remains at the level of principles and guidelines, as it relies almost entirely on the systems set up at the level of the member states. Potential weaknesses in national quality assurance systems pose a significant risk to transnational qualifications frameworks, but these can be mitigated through alternative approaches, such as encouraging collaboration between less and more developed countries.

10. The significant impact of a **preceding sectoral framework**, such as through Bologna for higher education in the EU, in facilitating the implementation of a transnational qualifications framework is emphasised both within the EU context, and externally by key role-players involved in similar developments internationally.

11. Building mutual trust is identified as a challenge across the case studies. In some cases this is addressed in a very explicit manner, such as in the EQF, while in others it remains implied only. **Referencing** methodologies remain underdeveloped and skewed towards technical rather than social and trust building dimensions. With only a few exceptions, referencing is taking place to the EQF

only, even from outside the EU. The extent to which referencing contributes to the building of mutual trust is yet to be established, but will require further development of the existing methodology as all EU member states are encouraged to complete the process by 2011. The EQF level descriptors are also increasingly being used as a common reference point by countries outside of the EU. Examples include various NQFs, regional qualifications frameworks, as well as the VUSSC TQF.

12. Improvement of **communication** and advocacy is lacking in most cases and is noted as an important future priority in more than one of the case studies.

13. Structured **peer learning**, knowledge-sharing and capacity development is noted as an important dimension. In this regard it is only the EQF that has made significant progress through multiple arrangements, such as the national coordination points, working groups, and on a more practical level also the Cedefop virtual communities. Compared to other regions, the capacity within the EU to engage resources and a range of agencies and programmes in the EQF development at various levels, and from a range of different but complementary positions, is significant and has undoubtedly been one of the key factors contributing to the successful development of the EQF.

14. The avoidance of unnecessary additional bureaucracy that may arise with the establishment of a regional agency is well recognised. There is however strong evidence to support the need for some form of less resource-intensive **governance structure** for a transnational qualifications framework. In this regard, the diversified and decentralised approach followed in the EQF supported by a small but effective and longstanding project team within the European Commission, supported by Cedefop stands out as a good practice example. In this context, the continuity of key people involved in implementation, complemented by new thinking, also stands out as an important success factor. A word of caution is needed here as the European Commission relies also on external service providers under different forms (consultancy, IT services, logistics, etc.).

15. **Credit transfer** mechanisms, such as ECVET within the EU, are recognised as playing an important role in supporting the development of transnational qualifications frameworks. With the exception of the EU, credit transfer mechanisms are not being developed at present.

16. **Regional and international conventions**, such as the Arusha Convention in Africa, the Lisbon Strategy in Europe and the Caribbean Single Market and Economy, form an important basis in which the development of a transnational qualifications framework can take place. In this respect, the important supportive role of regional agencies (such as the European Commission, the SADC, CARICOM and ASEAN secretariats, and also the Commonwealth of Learning) is also evident.

4. PROSPECTIVE CONSIDERATIONS

As indicated at the outset of this report this study has had a twofold purpose: the first part is about stocktaking and a critical analysis of the five transnational qualifications frameworks included as case studies; the second part explores some of the prospective considerations for transnational qualifications frameworks. The first part was concluded in Chapter 3 of the report and ended with a list of key findings from the comparative analysis across the five case studies: the EQF (regional qualifications framework), SADCQF (regional qualifications framework), VUSSC TQF (transnational qualifications framework), CVQF (regional sectoral qualifications framework) and the ASEAN Framework Agreement (regional qualifications framework). Still to be considered are some of the main future trends and influences as the five frameworks included in the case study are further developed, and in all likelihood, as more transnational initiatives develop around the globe. This is confirmed by the early signs of development amongst Arab States (UNEVOC, 2003; Chakroun & Jimeno Sicilia, 2010), in the South Pacific (SPBEA, 2009; Fearnside, 2009), Asia-Pacific (APEC, 2009) and Africa (African Union, 2006 & 2007).

The three overarching questions for this study that were asked at the outset of the report provide a useful categorisation of the prospective discussion in this chapter.

- What models of regional qualifications frameworks and what implementation strategies and approaches are under development?
- To what extent are regional qualifications frameworks able to achieve the various desired policy objectives associated with them particularly regarding mobility of labour and recognition of qualifications?
- To what extent are regional frameworks influencing the development of NQFs?

This is followed by some brief comments on the research process, including some suggestions for further research, and a few final comments.
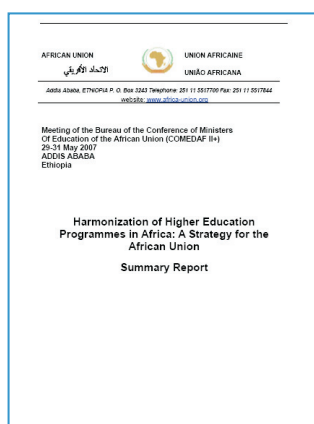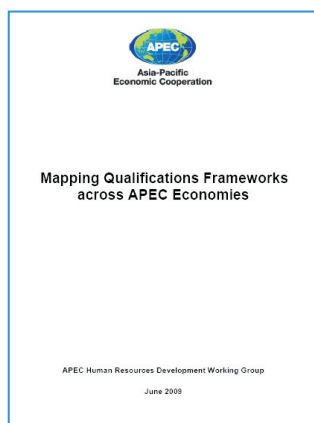
4.1 MODELS AND IMPLEMENTATION STRATEGIES

At the time of the completion of this study, in early 2010, the EQF was the only transnational qualifications framework that has moved substantially into an implementation phase. The EQF has not only gained wide acceptance within the EU, but is also increasingly being used as a reference point internationally by other intra-national (sectoral), national and transnational qualifications frameworks. There is evidence of the use of EQF levels and descriptors by third countries (ETF, 2010). There is also a growing discussion on potentially linking the national qualifications frameworks of third countries to the EQF (i.e. countries that are not part of the EEA). Australia is a case in point, but others might follow. In this regard, it is worth noting that 15 countries are part of the European Higher Education Area, and are hence committed to developing NQFs for higher education compatible with the EHEA-QF, without being members of the EQF. These countries seem to have clear incentives to look towards the EQF in developing their NQFs, as they seem to be following (almost without exception) the trend towards comprehensive frameworks. Other countries are also looking to the EQF as a reference, as evidenced by the ETF conference on the global dimension of the EQF held in Brussels in January 2009 and the recent ETF inventory (ETF, 2010). These countries may wish in the future to demonstrate the compatibility of their NQFs with the EQF. This can of course be done without formally referencing frameworks of third countries to the EQF but one could also imagine that some way could be found to give visibility to referencing reports in conformity with EQF criteria.

The sectoral regional initiative in the Caribbean, the CVQF, has made significant progress, and the VUSSC TQF is also moving ahead, but compared to the EQF, both these frameworks are still facing serious challenges relating to sustainability. The SADCQF process, on the other hand, has been derailed as a result of the prioritisation of NQFs at the expense of the regional framework. The ASEAN framework is still at too an early stage to make any conclusive judgment.

Looking to the future, the EQF model and its implementation strategy provides a useful benchmark to other developments, but is not a universal blueprint as the different contexts have a fundamental influence on the models developed and implementation strategies followed. Keeping this in mind, and looking also beyond the current EQF model, the following are some of the main points to keep in mind.

■ A multipronged, diversified and largely decentralised approach that involves multiple layers of stakeholders and regional institutions, supported by a small but specialised unit within a regional agency, is less resource-intensive and enables very broad participation. The involvement of the economic sector may be more challenging in this regard, but is important for sustainability in the long term.

■ A successful sector-specific qualifications framework, be it for higher education (as in the EU), TVET (as in the Caribbean) or a smaller sector (as in the VUSSC TQF), provides a strong basis for the development of a more comprehensive transnational qualifications framework. Sector-specific antecedents of the EQF such as the Bologna process for higher education leading to the development of the European Higher Education Area, and the Copenhagen process for TVET, provide strong evidence to support this claim.

■ Communication and advocacy of the framework is a critically important part of implementation and is often neglected as it is regarded as an expensive add-on that can only be done once more pressing issues have been addressed. An example of good practice in this regard is the Cedefop community updates on the EQF that have a very wide reach.

■ A common mistake is for qualifications framework development to be viewed as a purely technical exercise. This narrow approach does not build mutual trust as a careful balance between the technical and social dimensions is essential. In this regard referencing has emerged as an important lever through which the trust can be built and transparency improved. The methodology is however still limited and will be strengthened as more countries complete the process. The planned review of EQF in 2013 will be a relevant source of information and knowledge sharing across regions.

■ Credit transfer mechanisms form an integral part of qualifications frameworks. NQFs developed without credit accumulation and transfer mechanisms are increasingly taking note of this point (see Cedefop, 2010), and the same should apply to transnational qualifications frameworks in the future. In this regard, in Europe, the adoption of ECVET and the implementation of the European Credit Transfer System (ECTS) for Higher Education might prove invaluable to the broader EQF process.

4.2 MOBILITY AND RECOGNITION ISSUES

As stated in Chapter 3 of this report, the research found limited evidence of the impact of transnational qualifications frameworks on the recognition of qualifications at this point. The potential added value of transnational qualifications frameworks, such as improving links between NQFs, increased mobility of individuals and changes in the behaviour of employers, is not refuted by the available evidence, but neither is it convincingly proven.

What is more encouraging is that it is evident that the ways in which mutual recognition is practised internationally has already been influenced by transnational qualifications frameworks, and will continue to be challenged in the future. This tension between outcomes-based methodologies (implicit in qualifications frameworks), and more traditional input- and time-based approaches (evident in MRAs and EC directives), constitutes an important zone of contestation that must be addressed going forward. This challenge applies not only to the case of the EQF and the EU directive on professional qualifications, but also in the case of emerging ASEAN Framework Agreement, and potentially in other parts of the world. The extent to which the traditional approaches to the mutual recognition of qualifications constitute a basis upon which a qualifications framework can be developed should however, not be disregarded.

An important area requiring further development in the future is robust and credible methodologies for the recognition of qualifications within the qualifications framework and outcomes-based environment. At this stage these methodologies are still underdeveloped and are at best crude combinations of time-based and outcomes-based approaches. In this regard the International Standards Classification of Education (ISCED) (UNESCO 2006), which is currently being revised, and has been used primarily as a statistical tool, can play an important role in considering the statistical consequences of the learning outcomes approach, but also the broader applicability of outcomes-based recognition methodologies.

As previously noted, migration is increasingly becoming a major global factor that has directly influenced, and probably also accelerated, the development of qualifications frameworks across the world. There is a risk that qualifications framework development follows migration trends adopting features of destination countries, rather than being developed for purposes of transparency and mutual recognition per se.

The inclusion of career guidance and counseling, as well as different forms of lifelong learning, also non-formal and informal, is another key challenge that will have to be faced going forward. In this regard the recent initiative of the OECD on the recognition of non-formal and informal learning (OECD 2010), as well as the investigation by the Association for the Development of Education in Africa (ADEA) (McKay & Romm, 2006) into NQFs and non-formal education, provide important insights that will also be of value to transnational qualifications framework development.

ADULT LEARNING AND RECOGNITION

Adult education needs to have systems for learning validation which are equivalent to those in formal education systems, regardless of where and when the learning has occurred. Basic and non-formal education need to be included within the NQFs so that they can access the 'ladders' and 'bridges' which avert educational dead-ends. This requires articulation between the different levels and kinds of learning.

Source: Sub-Saharan Africa report that provided the basis for the Global Report on Adult Learning and Education published by the UNESCO Institute for Lifelong Learning, 2009
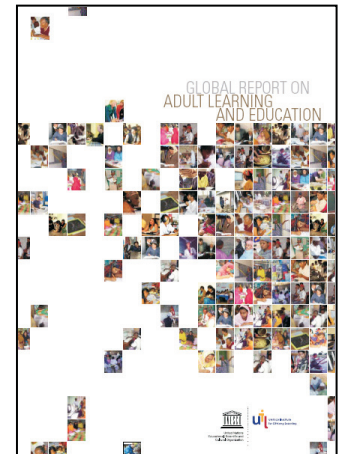
4.3 INFLUENCES OF TRANSNATIONAL QUALIFICATIONS FRAMEWORKS ON NQFs

The interplay between transnational qualification frameworks and NQFs has been discussed at length in this report. What remains is to briefly consider some of the future implications of these interactions. In this regard the increased convergence (which is sometimes opposed in the EU, but welcomed in SADC) is something that will have to be closely monitored in all transitional developments. The explicit intention of developing a transnational framework as a meta or reference-framework encourages member states to align their NQFs to this reference point. While such alignment may initially be limited, more so where a member state has a well established education and training tradition, there is no doubt that the level of alignment will increase over time to facilitate increased

mutual recognition and mobility, even in EU member states. In countries with less developed education and training systems, such as some countries in SADC, the Caribbean and ASEAN, the convergence effect will be even stronger. The extent to which this overall convergence of education and training systems will devalue existing traditions and contribute to a lack of regard for diverse local contexts remains to be seen, but is clearly a risk that will need to be managed. The decision of the European Commission to fund national coordination points in the future is an important development and is a clear indication that the regional process will have an even greater impact on the national processes going forward.

A point that has been made several times in this report is the mutual benefits of following a parallel approach when developing a transnational qualifications framework in tandem with NQFs. The SADCQF is a prime example of a region that has opted to rather prioritise the regional qualifications framework, and has paid the price for this decision.

RATIONALE FOR THE HARMONISATION OF HIGHER EDUCATION IN AFRICA

The African Union Strategy for the Harmonisation of Higher Education Programmes will facilitate the comparability of qualifications awarded across the continent and help drive quality assurance measures, which will ultimately contribute to greater quality of education in Africa. Creating a mechanism for benchmarking and comparison of qualifications will allow for professional mobility for employment and further study, as well as expanded job markets. Developing widely accepted standards for quality will also facilitate the creation of centres of excellence.

Harmonisation will benefit Africa, since it will allow for greater intra-regional mobility, thereby fostering increased sharing of information, intellectual resources, and research, as well as a growing ability to rely on African expertise rather than skills from elsewhere in the world. It will increase access to reliable and transparent information, and promote greater networking among all stakeholders in higher education. This includes creating increased dialogue and cooperation between the higher education systems of different linguistic areas (which have different education systems), allowing for a more coherent and unified vision for African higher education. On a broader level, harmonisation has the potential to create a common African higher education and research space, and achieve the African Union's vision that African higher education institutions become a 'dynamic force in the international arena'.

Source: Harmonisation strategy for higher education, African Union, 2007

4.4 COMMENTS ON THE RESEARCH PROCESS

The initial decision to limit the research to an initial exploration proved difficult to adhere to as the largely unexplored terrain required that a thorough basis be laid for future research. In this regard the following research activities are suggested going forward.

- A review of the reference methodology being used in the EQF context is suggested in order to improve the process, but also to give other regions more insight into a process that is not purely technical; recent work by Hart (2008) and other will provide a useful point of departure.
- The development of outcomes-based recognition methodologies is required, specifically in relation to MRAs that are still being adhered to, the use of ISCED, and the involvement of credential evaluation agencies; in this regard research into the comparability of teacher qualifications in the Commonwealth context (Keevy & Jansen, 2010), Cedefop's research (2009) into learning outcomes, and more recently, the intention of the Canadian Tourism Human Resource Council to map qualifications framework standards to skills levels in Bloom's taxonomy (CTHRC, 2010), may prove useful.
- A closer investigation into the interrelation between migration and qualifications framework development is long overdue; here research by the OECD (2009) and the Global Commission on International Migration (2005) will be of value.
- The extent to which policy learning takes place (as opposed to policy borrowing) within the complex interrelationships between NQFs and transnational qualifications frameworks is an unexplored terrain; recent research into this area within different contexts will be of value (see Chakroun & Jimeno Sicilia, 2010; Chakroun, 2010; Raffe, 2009).
- The call to understand qualifications frameworks as social constructs is not new, but has to date not been researched in any meaningful way; in this regard the work of Coles (2007), Coles & Oates (2004) and Leney (2009) will be worth exploring.
- The relationship between credit transfer and accumulation (CAT) and qualifications frameworks is an important area that requires closer scrutiny. As Cedefop has already been proactive in undertaking this research (Cedefop, 2010), it is imperative that the findings are widely disseminated and debated in public forums.
- The inclusion of non-formal and informal learning within qualifications frameworks is another terrain that requires further research. Here the European Inventory of Validation of Non-Formal and Informal Learning (Cedefop, EU since 2005) OECD's research into RNFIL (OECD, 2010) and the just started project of the UNESCO Institute of Lifelong Learning on the link between NQF and the recognition, validation and accreditation of non-formal and informal learning (RVA) (UIL, 2010) will prove invaluable. In Europe in particular there has been comparative research over the past ten years in this area, which shows that systems for validation are slowly emerging in a number of countries, but are so far a marginalised route to certification.

4.5 COMMENTS RELATED TO THE CASE STUDIES

In concluding this chapter on prospective considerations it is useful to make a few brief forward-looking suggestions pertaining to each of the case studies.

In the case of the EQF the strong push to complete referencing of NQFs to the EQF by 2011 seems rushed and may limit the extent to which the referencing methodology can be improved. The extent to which the EQF becomes an international reference point may be welcomed in the short term, but may also result in a number of unintended consequences. The involvement of the economic sector seems to be a move in the right direction, as well as the increased attempts to explore the links to the workplace. Both the co-existence of the EQF and the EU directive on professional qualifications, the link between EQF and the framework qualifications of the European Higher Education Area will have to be addressed sooner rather than later.

For the SADCQF the 2005 decision to delay the implementation of the regional qualifications framework in favour of NQFs and quality assurance systems in member states has had a serious impact on progress within the region. This issue needs to be raised with senior officials and ministers as a matter of urgency. An implementation strategy for the SADCQF must be developed that is not entirely dependent on the SADC Secretariat and TCCA. The failure of the SADC to take decisive ownership of the SADCQF on the political level is another reason for the delayed implementation. The undue reliance on donor funding in order to establish the SADCQF is also of concern.

The VUSSC TQF needs to be officially endorsed by ministers of the small states. Until this happens the initiative is taking place at a huge risk. Small states also need to take ownership of the process and decrease their dependence on the Commonwealth of Learning. Lastly it is evident that not all small states need to develop NQFs in order to participate in the initiative.

The sustainability of CANTA is a key concern in the CVQF. More work on the CVQs to improve uptake and wider awareness is required. CARICOM may also want to consider how best to further develop the CVQF into a comprehensive framework that is not limited to TVET as much of the groundwork has already been done.

Just as in the case of the VUSSC TQF, it is acknowledged that not all CARICOM countries need an NQF. As a relative newcomer, the ASEAN Framework Agreement is in the unique opportunity to learn from the mistakes made in the other transnational qualifications frameworks. In this regard the 'SADC lesson' of not focusing entirely on

NQFs is important, as well as the 'EQF lesson' to avoid the incompatibility between the mutual recognition agreement framework and a potential future regional qualifications framework. The ASEAN region may also want to consider focusing on a particular sector (such as VET or higher education) before embarking on the development of a comprehensive regional qualifications framework.

4.6 PROSPECTIVE CONSIDERATIONS FOR TRANSNATIONAL QUALIFICATIONS FRAMEWORKS

Two main themes are followed throughout this report: the potential influence of transnational qualifications frameworks on the recognition of qualifications nationally and internationally; and the wider interplay between national and transnational qualifications frameworks. Based on a review of the available literature and 19 targeted interviews, located within the proposed conceptual framework, the study presents one of the first attempts at providing a more comprehensive and comparative view of the international dimension of qualifications frameworks based on these two themes. Looking to the future, the prospective considerations for transnational qualifications frameworks as identified in the study are discussed below.

The challenge of transnational qualifications frameworks to existing qualification recognition methodologies[8]

The study has found conclusive evidence that transnational qualifications frameworks are introducing new qualification recognition methodologies that are challenging the current mutual recognition agreement (MRA) models that have been the preferred instruments for recognition of qualifications to date. With the increased internationalisation of qualifications and cross-border provisioning the current methodologies remain in place and are often legally enforceable, yet these methodologies are increasingly viewed as limited, opaque and restrictive when compared to the new outcomes-based and transparent approaches that have been introduced through national and transnational qualifications frameworks. Most critically, it is evident that the application of time-based methods to the recognition of outcomes-based learning remains a contradiction that will be increasingly challenged as the global community continues to embrace lifelong learning in all its facets. In this regard the EQF is a case in point, as it seems increasingly difficult to combine the approaches of the EU Directive on professional qualifications with the EQF for lifelong learning. Similar challenges are however on the

horizon in other regions as other transnational qualifications frameworks mature beyond the early orientation and conceptualisation staged.

A complicating factor in this area is the extent to which migratory challenges are addressed through the recognition of qualifications. There is no doubt that when attempting to control the flow of migrants, the current MRA models can be used with much greater efficiency largely due to the fact that these models are open to political abuse directly as a result of the lack of transparency. This study takes place at a transition point as the limitations of the existing methodologies are becoming clearer, at a time when the new outcomes-based methodologies are not yet robust and credible enough to replace what exists, and critically, also at a time when countries across the world are struggling to cope with the challenges of increased international migration. The fact that many countries are still at early stages of transforming their education and training systems using outcomes-based approaches, in most cases accompanied with a lack of critical engagement, may further hamper the transition. Furthermore, the extent to which transnational qualifications frameworks are making a direct contribution to the improved recognition of qualifications nationally and internationally, has not yet been proven beyond a doubt. As demonstrated through this study, there are positive indications of improved recognition, but after only five years of development of transnational qualifications frameworks (since 2005) it is still too early to provide conclusive evidence to support this claim.

Considering this challenge to existing recognition methodologies, the following prospective considerations for transnational qualifications frameworks are suggested:

- Systematic and credible research into outcomes-based recognition methodologies is urgently needed.
- The relationships between time-based and outcomes-based approaches need to be explored and discussed with and between key role-players, including credential evaluation agencies, qualifications agencies and ministries.
- There needs to be agreement on how longitudinal monitoring of international mobility can be developed to measure how transnational qualifications frameworks are contributing to international mobility.

The interplay between national and transnational qualifications frameworks[9]

The second theme of this report has been the wider interplay between transnational qualifications frameworks and NQFs. Research has shown that there is a strong interdependence between transnational qualifications

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8 For further reading and clarification see: The recognition of qualifications (Section 1.2); Shift to learning outcomes (Section 3.4); Increased recognition and credibility of qualifications (Section 3.7); Key comparative findings 1-5 (Section 3.11); Mobility and recognition issues (Section 4.2); and Comments on the research process (Section 4.4).

9 For further reading and clarification see: The relationship between transnational and national qualifications frameworks (Section 1.5); A comparison of NQF developments within the transnational qualifications frameworks (Section 3.2); Interplay between transnational qualifications frameworks and NQFs (Section 3.10); Key comparative findings 6-10 (Section 3.11); and Influences of transnational qualifications frameworks on NQFs (Section 4.3).

frameworks and NQFs on a number of levels and across three broad categories of prioritisation: NQF development, transnational qualifications framework development, and parallel development of the transnational qualifications framework and NQFs. While both advantages and disadvantages of the three categories have been identified, it is reasonable to assume that the prioritisation of NQFs at the expense of the transnational qualifications framework disadvantages both transnational and national processes, while parallel development seem to be much more successful.

Evidence shows that the level of development of NQFs, and as a result also quality assurance systems, vary greatly and do not have a direct correlation with the level of development of the transnational qualifications framework(s) in which they are located, but do nonetheless result in significant influences in terms of conceptualisation. There is strong evidence to show that first generation NQFs have in many cases had a significant influence on the design of transnational qualifications frameworks, while in turn, many second and third generation NQFs are being strongly influenced by the looser and linked approaches of the emerging transnational qualifications frameworks. In this regard context is a key factor that not only magnifies or reduces the external influences, but also requires careful analysis (Young & Allais, 2009). The involvement of the majority of member states in a transnational qualifications framework is clearly also a supporting factor.

The extent to which different transnational qualifications frameworks influence each other appears to be very limited, with the exception of the EQF that is increasingly being used as an international reference point.

The following prospective considerations for transnational qualifications frameworks are suggested.

■ Care must be taken to avoid translating the wisdom and experiences of NQFs to transnational qualifications frameworks. While the two types of qualifications frameworks may have much in common, there are also significant differences in terms of purpose, scope and prescriptiveness to mention but a few.
■ A preceding education or economic sectoral qualifications framework (e.g. for higher education, VET, marketing, food security, health and security, etc.) clearly constitutes an important basis for a comprehensive transnational qualifications framework.
■ The impact of the referencing process on the transnational qualifications framework is still not clear. However, EU experience shows that the referencing process might highlight gaps in the overall structure of the transnational framework or in the referencing arrangements and criteria.
■ The impact of harmonisation on existing education and training systems may not be desirable, and both intended and unintended harmonisation will have to be closely monitored. This convergence effect may be stronger in less developed countries, and more so with harmonisation is an overt objective, but even more developed countries will be affected.

Qualifications frameworks as social constructs

Critics of qualifications frameworks rightly argue that the development and implementation of qualifications frameworks often result in overly technical and behaviourist approaches to be introduced (see for example Cedefop, 2009a). While this has been the case for more than one of the first generation NQFs, there is an increasing realisation that qualifications frameworks are social constructs that need to be developed in consultation with stakeholders, engaging with resistance and contestation, and most importantly through building mutual trust:

> 'The essential nature of the [qualifications framework] is that of a social construct, in that we as social actors in society not only theorise about, construct and implement it, but we also enable, actively change or work against it.' (Isaacs, 2001, p. 124)

As an example, there is increasing awareness that the social uses of qualifications impact directly on attempts at improving transparency of qualifications, while social valuing remains largely intangible and is currently located beyond the boundaries of the qualifications framework discourse (Isaacs & Keevy, 2009).

This sentiment is echoed in a recent Cedefop publication on the development of NQFs in Europe:

> 'While most stakeholders agree on this general objective, experiences so far show that NQF developments are indeed political processes which in some cases trigger conflicting points of view. Frameworks provide a new platform for dialogue – across traditional borderlines of subsystems, sectors and institutions – facilitating discussion on how to improve current practices and how to remove barriers to education, training and learning. It is important to keep in mind this political character of the new national frameworks; to understand them as neutral, technical instruments seems inappropriate.' (Cedefop, 2009b, p. 2)

The strengths and the weaknesses of both NQFs and transnational qualifications frameworks become evident when referencing takes place, but only if both social and technical dimensions are considered. The study has shown that referencing is still not well developed, and even less understood, but is nonetheless an important process that can contribute to increased transparency and building mutual trust, all the more so when combined with appropriate governance structures, effective credit transfer mechanisms and established regional and international conventions. The study has also shown a real risk that the referencing process is interpreted in an overly technical manner, limited to levels, level descriptors and qualification types.

The following prospective considerations for transnational qualifications frameworks are suggested.

■ Transnational qualifications frameworks are not purely technical instruments that can be implemented across

a range of countries. There are critically important social dimensions through which trust, transparency and mutual understanding must be built to ensure sustainability and impact.

■ Referencing methodologies must be further developed and discussed beyond the EU context. Care must also be taken to ensure that referencing includes social dimensions. Consultation processes and communication strategies are key features of the referencing process. The latter provides opportunities to raise awareness about transnational qualifications framework, to debate and challenge aspects of the proposed alignments and to identify issues for the national frameworks arising out of the referencing process (see QF, 2009).

■ Research into zones of mutual trust (Coles & Oates, 2004), communities of practice (Wenger, 2007), and the social dimensions of regional integration (International Institute for Labour Studies, 2008) should be further developed.

The potential role of international sectoral qualifications

International companies and international sectoral organisations[10] are developing international qualifications. This is the case in Europe where for example a qualification structure for hairdressing certificates has been established through a European agreement. There are also some other sectors, in which highly skilled professionals are becoming increasingly mobile and where qualifications of a similar nature are offered across a range of countries. Transport (particularly maritime), Tourism and construction sectors are a case in point.

In this context, international qualifications and sectoral frameworks which are part of more than one national framework are expected to develop. The EQF recommendation acknowledged and anticipated these developments:

'The European Qualifications Framework should, moreover, enable international sectoral organisations to relate their qualifications systems to a common European reference point and thus show the relationship between international sectoral qualifications and national qualifications systems.'

The implications for recognition of qualifications could be profound. The key issue with which global players are faced is how international sectoral qualifications frameworks relate to national and transnational qualifications frameworks. For instance, international sectoral organisations may want to avoid having to go through many and possibly differing national procedures of referencing the international sectoral qualifications framework to NQFs. A direct linking to the transnational qualifications or to global reference would most likely be more appealing and effective for international sectoral organisations. The discussions at the European level show that this is still

opposed by some national authorities fearing that such international qualifications may reduce their leverage over their own qualifications systems. From the transnational qualifications framework perspective it may be difficult to postpone let alone refuse referencing of well respected international qualifications, as this would bring reputational risk that could erode confidence in the framework.

Potential for future global interaction[11]

Provoking global conversations on recognition of qualifications is urgent. The increased interdependence of the world's economy and the growing global labour market is by now evident. The recent global financial crisis is the most visible evidence of this. Other evidence is the growing globalisation of trade and manufacturing. In last decade, many services have been outsourced. This means that even though international movement of individuals is increasingly restrained to highly skilled people, the mobility of jobs is a reality. In this context, neglect of the demand for simple, transparent and sustainable processes for recognition of qualifications is increasingly problematic in meeting the challenges of migration, mobility and economic growth. This report provided evidence and examples of countries actively participating in different transnational qualifications frameworks. The report also examined processes, like the Bologna process, where countries belonging to different regions are actively engaged in building common framework (in the case of Bologna the EHEA-QF). Interaction across transnational qualifications frameworks has already started with some countries operating within several transnational frameworks. Through all these developments, a new international system is being constructed. The shape this new order will take is still open to discussion and will largely depend on the development of the NQFs and transnational qualifications frameworks over the next few years; the emergence of one global reference framework is difficult at this stage? However, the ongoing work on the revision of ISCED and its results might determine future developments in this direction.

4.7 CONCLUDING COMMENTS

Qualifications frameworks have become a global phenomenon that may offer shared international tools through which the recognition of qualifications of individuals migrating between countries and regions can be realised. Significantly though, qualifications frameworks are not without problems, and it is important to be aware of the limitations and continually address these through research and reflection. New understandings of qualifications frameworks as frameworks of communication, coordination and collaboration across education, training and work (Parker & Walters, 2008; see also Jorgensen, 2008; and Bjornavold & Coles, 2009) are important and need to be further developed to inform the international dimension of qualifications frameworks.

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10 International sectoral organisation means an association of national organisations, including, for example, employers and professional bodies, which represents the interests of national sectors.

11 For further reading and clarification see: Referencing of qualifications frameworks (Section 1.6); Referencing (Section 3.6); Key comparative findings 11-16 (Section 3.11); and Comments on the research process (Section 4.4).

At the international level, the impressive developments of NQFs have not been accompanied by relevant collaborative work and efficient mutual learning mechanisms across countries and regions. This is not to ignore a number of international conferences and workshops organised by key international organisations but these initiatives are generally ad-hoc and short-term initiatives. Further strengthening the knowledge partnerships across countries and regions remains an issue for key players in the field.

Furthermore, the development of NQFs is challenging several international classification and statistics tools, triggering new approaches for linking occupations and qualifications using learning outcomes, challenging old approaches for the comparability of qualifications. Addressing these issues collectively is obstructed by the lack of sustainable collaborative work at the international level. This results in limited mutual benefits and reduced cooperation across regions.

The ETF trusts that this research will make an important contribution to the international discourse on the recognition of qualifications and invites individuals and organisations to engage in a meaningful way with the findings, to point out the weaknesses and most importantly, to actively engage in debates that will improve mutual understanding of a phenomenon that is now truly global. There is a clearly a need for more dialogue and mutual learning on these issues. In order to strengthen sustainable collaboration in this field the ETF is supporting the establishment of an open platform on qualifications.

ANNEX: LIST OF INTERVIEWS

European Qualifications Framework

Five interviews were held with individuals involved in the EQF: Marlies Leegwater (Ministry of Education, Netherlands), Gordon Clark, Jens Bjornavold and Carlo Sactoli (European Commission/Cedefop), and David Raffe (University of Edinburgh). Collectively the interviewees represented vast experience in the EQF process, mostly from the perspective of the European Commission, but also as viewed from a country-perspective and an independent researcher. Without referring to specific individuals the following descriptions provide a broad overview of the involvement in the EQF of the five interviewees:

■ from the very start in conception, outline, consultation process with member states, blueprint, and negotiations at European level;

■ for 12-13 years (since the 1990s) through the European Forum on Transparency (Cedefop), various political initiatives in VET and lifelong learning (such as the Copenhagen process in 2002);

■ in the Bologna process for higher education and then also the EQF for lifelong learning;

■ member of EQF Advisory Group;

■ in NQF development in the Netherlands, Scotland and Ireland;

■ rapporteur for the Glasgow 2005 conference on the EQF;

■ participated in 2006 Budapest conference on the EQF grid and types of outcomes;

■ involved in current Cedefop research into the changes in qualifications;

■ involved in ILO study on NQFs;

■ coordinator of team within the European Commission responsible for the EQF, Europass and PLOTEUS portal;

■ manages the activities of the EQF Advisory Group.

Additional interviews with a regional education provider and the European Association of Sports Employers could not be confirmed within the period available.

Southern African Development Community Qualifications Framework

Five interviews were held for the SADCQF case study: Lomthie Mavimbela (SADC Secretariat), Isaac Ntshoe (University of South Africa), Franz Gertze (Namibian Qualifications Authority), Joe Samuels (South African Qualifications Authority and Vice-chair of the SADC Technical Committee on Certification and Accreditation [TCCA]), and Alison Schmidt (formerly from the New Zealand Qualifications Authority, currently involved as independent researcher based in Botswana). The involvement of the five individuals includes the following:

■ SADC secretariat point person overseeing the work of the TCCA;

■ involved from the beginning in developing the SADCQF concept as a mechanism for the comparability of qualifications;

■ director of national qualifications authority which is a member of SADC, involved in the TCCA and the development of the SADCQF concept paper in 2005;

■ TCCA vice-chair for nine years;

■ SADCQF had already been conceptualised when joined – key issues identified include the comparability of qualifications in the SADC region, and criteria and mechanisms for comparability for qualification in the region;

■ experience with the SADCQF is more recent, but was also involved in the Commonwealth of Learning TQF process as member of the research team that developed the TQF concept document;

■ provider involved in the Angolan NQF;

■ provider of training to students from Africa – mostly from SADC, fewer from Angola, the Democratic Republic of the Congo and Mozambique;

■ involved in the Centre for the African Renaissance (based in Ethiopia) and other smaller regional centres.

Additional interviews with the SADC TCCA chairperson and an international agency involved in capacity development (the GTZ) were pursued but did not take place: the chairperson had recently retired from his position in the Zimbabwean Ministry of Education and the GTZ was unable to respond in time.

Transnational Qualifications Framework for the VUSSC

Five interviews were held with individuals involved in the TQF: John Lesperance (educational expert recently appointed by the Commonwealth of Learning to oversee the VUSSC and TQF, based in Vancouver, formerly from the Seychelles Ministry of Education and closely involved in the development of the Seychelles NQF since 2003), Michael Bradshaw (Trinidad and Tobago Accreditation Council, also involved in CARICOM), Richard Wah (South Pacific Board for Educational Assessment, based in Fiji, also involved in the development of a regional register for the Pacific), Kaylash Allgoo (Director of the Mauritius Qualifications Authority and chairperson of the TQF Management Committee, also involved in the SADCQF process), and Andrea Hope (Hong King Ministry of Education, and member of the research team that developed the TQF concept document, indirectly involved in the establishment of the Hong Kong NQF). The involvement of the five individuals includes:

■ organised regional cluster meetings to agree on the TQF and get input from all concerned;

- got directly involved when the TQF Management Committee had already started to work on the implementation document;
- involved in VUSSC since it started, but from a member state perspective;
- involved in various discussion, e.g. Singapore consultation meeting and meetings of the TQF Management Committee;
- in the process of finalising the TQF implementation document (structure and guidelines of TQF) which will serve as a 'convention' that can be signed by ministers of education;
- considered the Caribbean regional process and brought this information to the TQF process;
- member/vice-chair of TQF Management Committee tasked to develop the TQF in the context of small states;
- involved in INQAAHE studies;
- organised cluster meetings to improve understanding of the proposed Pacific Qualifications Framework;
- member of the Higher Education Commission in Fiji that is setting up an NQF;
- director of a national qualifications authority, attended senior official meetings, and elected as chairperson of TQF Management Committee;
- ex-officio member of VUSSC Management Committee;
- directly involved in the conceptualisation stage of the TQF during the development of the TQC concept document in 2007.

Additional interviews with the Commonwealth of Learning and the Samoan Qualification Authority were planned but did not take place: the COL interview was deferred to John Lesperance, while the SQA interview could not be finalised in time.

CARICOM TVET Qualifications Framework

Only one interview took place for this case study: Hassan Ndahi (ILO regional office for the Caribbean). Several online engagements took place with Myrna Bernard and Morella Joseph from the CARICOM Secretariat. Information from Michael Bradshaw (Trinidad and Tobago Accreditation Council, interviewed for the TQF case study), was also useful. Involvement was therefore limited if compared to the other case studies, and included:

- senior ILO specialist for skills and employability based in Trinidad and Tobago;
- joined CARICOM region in 2008;

- works closely with the training agency in CARICOM (CANTA) which has agreed to a TVET Strategy (1990) as part of the CSME focus on free movement of labour.

Additional interviews were pursued with Trevor King (Barbados VET Council), Paulette Dunn-Smith (CANTA/HEART) and the CARICOM Secretariat. The Barbados VET Council failed to respond to request, while Ms Dunn-Smith had reportedly changed employment. The CARICOM Secretariat was helpful and provided useful background information within the timeframe of the study.

ASEAN Framework Arrangement

Three interviews took place for the ASEAN Framework Arrangement: Elvin Fernandez (Malaysian Institution of Surveyors), Prof. Zitha (Malaysian Qualifications Authority) and Jack Keating (Independent researcher based at the University of Melbourne, and who has been involved in various related studies including a case study on the Malaysian NQF for the ILO, the APQN study on qualifications frameworks, as well as the Australian NQF). Aspects of the involvement of the interviewees included:

- deputy president of the Institution of Surveyors Malaysia which is a professional body with 5,000 members;
- involved in ASEAN Valuers Association, Quantity Surveyors, and the International Valuers Standards Committee;
- employee of the Malaysian Qualifications Authority which is just more than two years old, and took over the role of two previous quality assurance bodies;
- involved in the establishment of the ASEAN Quality Network for which the Malaysian Qualifications Authority acts as secretariat;
- sharing and capacity building in ASEAN that is slowly building up understanding, but is just starting;
- started benchmarking with each other to see viability of an ASEAN regional qualifications framework, but this is probably only five years down the line; the current focus is on assisting countries to develop their own systems;
- conducted case study on the Malaysia NQF and APEC study on NQFs.

Additional interviews were pursued with the ASEAN and APEC secretariats but these were unsuccessful due to a lack of responses within the timeframes of the project.

ABBREVIATIONS AND ACRONYMS

AEI NOOSR	Australian Education International National Office of Overseas Skills Recognition
ASEAN	Association of Southeast Asian Nations
CANTA	Caribbean Association of National Training Agencies
CARICOM	Caribbean Community
COL	Commonwealth of Learning
CRAs	Competent recognition authorities
CSME	CARICOM Single Market and Economy
CVQF	Caribbean Vocational Qualifications Framework
CVQs	Caribbean Vocational Qualifications
CXC	Caribbean Examination Council
DG EAC	Directorate-General for Education and Culture (European Commission)
ECVET	European Credit System for Vocational Education and Training
EHEA	European Higher Education Area
ENIC	European Network of National Information Centres
EQF	European Qualifications Framework
ETF	European Training Foundation
EU	European Union
GTZ	German Agency for Technical Cooperation (Deutsche Gesellschaft für Technische Zusammenarbeit)
ILO	International Labour Organisation
IT	Information technology
MRAs	Mutual recognition agreements
NARIC	National Academic Recognition Information Centres
NCPs	National coordination points
NICs	National information centres
NQF	National qualifications framework
NVQs	National Vocational Qualifications
OECD	Organisation for Economic Cooperation and Development
QF	Qualifications framework
RQF	Regional qualifications framework

SADC	Southern African Development Community
SADCQF	SADC Qualifications Framework
SARUA	Southern African Regional University Association
TCCA	Technical Committee on Certification and Accreditation
TQF	Transnational qualifications framework
TVET	Technical and vocational education and training
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organisation
VET	Vocational education and training
VUSSC	Virtual University for Small States of the Commonwealth

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