



Study on the (potential) role of qualifications frameworks in supporting mobility of workers and learners

European Commission and Australian Department of Education, Employment and Workplace Relations

Joint EU-Australia Study

## EXECUTIVE SUMMARY



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Date: October 2011

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The EU part of this study was prepared under the Framework Contract DG EAC FC 19/06.  
Request 150

## Executive summary

Countries are designing qualifications frameworks to improve the transparency and understanding of qualifications systems. Qualifications frameworks have features, such as the use of levels, level descriptors and learning outcomes, which make it easier to understand the structure of a qualifications system, the relationship between qualification types and they also create an opportunity to develop or structure existing qualifications databases. The increased transparency is expected to benefit learners, employers, counsellors and persons in other positions who need to understand people's qualifications nationally as well as internationally.

While a decade ago qualifications frameworks were a feature of only a few education and qualifications systems, over recent years many countries have decided to develop such frameworks. Australia has a long established qualifications framework (AQF) that has recently been revised. All European countries have either already implemented qualifications frameworks or are currently in the process of designing them. At European level, two meta-frameworks exist: the European Qualifications Framework for Lifelong Learning (EQF) and the Qualifications Framework for European Higher Education Area (QF EHEA). The role of these meta-frameworks is to relate national qualifications frameworks and to serve as translation tools. Countries reference their national qualifications frameworks or systems to the European meta-frameworks according to a set of commonly agreed criteria. There are no specific qualifications directly included in the meta-frameworks' levels, only the national qualifications frameworks or systems.

In this context of intensive developments in the area of qualifications frameworks, the European Commission and the Australian Department of Education, Employment and Workplace Relations, are engaged in a policy dialogue on this theme. Policy dialogue is a form of bilateral exchange on a topic of interest to the two parties with the aim of exchanging experience and good practice. It can result in joint actions. This report has been commissioned to feed into the policy dialogue. The objectives of this study were to:

- Collect and synthesise existing evidence about the role of qualifications frameworks in supporting mobility of workers and learners;
- Identify the existing obstacles in qualification recognition and discuss the potential and limitations of qualifications frameworks in this context;
- Outline the possibilities of and opportunities for linkages between the European Qualifications Framework and the Australian Qualifications Framework.

## Approach and methodology

To address the study objectives, the team followed a qualitative, exploratory and partly forward looking approach. Given the broad and diverse nature of the topic researched (the relationship between qualifications frameworks and mobility), the analysis relies on a limited set of primary or secondary data. Therefore the report cannot provide definitive answers to the questions asked. The data collection focused on nine countries (Australia and eight countries in the EU).

The main sources of information used were:

- Background information on trends in mobility of learners and workers;
- Existing research on mobility of these two groups in particular focusing on the role of and problems encountered with qualification recognition;
- Desk research covering national policies, policy documents and reports about the role of qualifications and qualifications frameworks for mobility and procedures concerning qualification recognition;
- Interviews with twenty two persons from organisations with different but active involvement in qualification recognition or mobility of learners and workers;
- Forward looking expert analysis of possible linkages between the EQF and the AQF.

The scope of the analysis was limited to the types of mobility that are likely to require qualification recognition. Consequently, for EU countries, emphasis was put on mobility outside the zone of free movement of EU-EEA citizens.

### Existing evidence about the role of qualifications frameworks in supporting mobility

Not all the nine countries analysed had a qualifications framework in place at the time of writing. The analysis found that in those countries with developed NQFs (Australia, Ireland, Malta and the United Kingdom), the levels and qualification types in the frameworks have become the 'benchmark' for judging foreign qualifications. They are not the only element of qualification recognition procedures but they do matter and make a difference. In some countries (Australia, Ireland and United Kingdom), those with established frameworks, the reference to NQFs and their levels has become part of the regulations for immigration policies. This shows that as qualifications frameworks become established elements of qualifications system, other policies and rules integrate them as a reference for situations where, in countries without NQFs, other types of reference (such as the type of education provision) is used.

Some frameworks are seen as having regulatory roles in supporting mobility of workers:

- In Australia, qualifications of persons who wish to migrate to Australia through the skills migration stream are allocated points according to the type of qualification in the AQF. Foreign qualifications of applicants for immigration are assessed against the AQF qualification types and their descriptors;
- In the UK, the definition of skilled and highly skilled persons is defined according to the UK NQF qualification levels.

In Ireland, the immigration regulations for workers are not explicitly related to the Irish NQF but the framework and related policies/structures has created a tool that supports systematic comparison of qualifications. Only persons with an employment offer are eligible for visa and it is for the employer to ensure that the qualification of the applicant is appropriate for the employment position. Employers may seek advice from the qualifications authority service on qualification recognition. This service holds a database with qualification types from most frequent application countries, which shows how the foreign qualification type compares to an Irish qualification type on the NQF.

Workers' migration in Malta concerns predominantly seasonal workers or low qualified persons.

Qualification recognition is not seen as having a major role to play in these situations and the policy is not explicitly related to the NQF.

Concerning the mobility of students, in Ireland a person is only eligible for a student visa if they apply for a programme that leads to a qualification at level 5 of the NQF (equivalent to level 4 of the EQF) or higher. Furthermore only qualifications that are accredited to the NQF are eligible.

In other countries with established frameworks, these are used to support student mobility without having a regulatory role:

- The Maltese strategy for internationalisation of education emphasises the need to make sure that Maltese qualifications are broadly recognised. It sees the NQF as a core element for achieving this;
- The Australian strategy also emphasises the need for worldwide recognition of qualifications awarded in Australia but it does not make an explicit link with the AQF.

Education institutions ultimately decide on qualification recognition of foreign student applicants. To do so they can rely on the opinion of ENIC/NARIC centres on how a foreign qualification compares to the domestic criteria for access to a programme/level. ENICs/NARICs use information about qualification level as one of the elements of the comparison. They also use qualification databases which complement (or are an element of) NQFs where they exist.

In countries where NQFs are in the process of development it is not possible to gather any evidence on their use for mobility at this point in time. In most countries the NQF development phase is very much focused on the national dimension of frameworks and, at least in the countries studied, the aspect of international recognition is not at the centre of the current debate. EU countries that are developing their NQFs now are doing so with a view to reference their frameworks to the EQF. The EQF is not a recognition tool as such but it helps to compare qualifications in a transnational context and thus it is expected to influence recognition practices. These concrete expectations from NQF development for recognition have been noted:

- Improved recognition of vocational qualifications of which there is a great variety worldwide and which are more difficult to compare than the relatively homogeneous higher education qualifications; and,

- Improved recognition of certain types of higher education qualifications that are not common in other countries.

### Obstacles in qualification recognition

The following obstacles in qualification recognition of mobile students have been identified:

- Recognition of professional bachelor degrees in view of further study in countries where no equivalent qualifications exist is problematic; and,
- Diversity of practices and approaches among higher education institutions within the same country. Higher education institutions are increasingly developing their own centres/units for foreign qualification recognition. They are at the same time creating their own practices in this area which are not always in line with the internationally agreed procedure.

Research on the degree of recognition of qualifications and credit for further studies is rare. In one country studied where such research exists (Germany), the proportion of people with sub-optimal recognition and those dissatisfied with the result is relatively high.

Recognition of mobile workers' qualifications appears particularly difficult. Research evidence indicates that mobile workers are frequently over-educated for the work they carry out. This situation is not solely due to lack of qualification recognition. Language skills of the host country are a major obstacle and other issues, such as obsolescence of qualifications or lack of professional networks are also a major factor influencing their labour market insertion. Nevertheless, these issues particularly related to qualification recognition were identified in certain countries:

- Lack of legal frameworks and non-existence of procedures to actually entitle and enable foreign workers (from outside the EEA) to get their qualifications recognised;
- Lack of employers' understanding of foreign qualifications (with the exception of those companies that have highly professionalised international recruitment services) and low awareness of the existence of recognition services where these exist; and
- Lack of a network similar to that of ENICs/NARICs that would support exchange of information about vocational qualifications in view of their recognition.

### The potential and limitations of qualifications frameworks to improve recognition

The study makes the following synthesis of the main potential advantages as well as limitations to improve qualification recognition in a context of growing and more and more diverse workers' and student mobility:

1. NQFs give information about qualification level and this is an important dimension for understanding qualifications. However, level is only one dimension needed for qualification recognition, other aspects are also important. NQF levels are therefore a first step in evaluating a foreign qualification, especially for formal recognition.
2. Qualifications frameworks can clarify information about other technical dimensions of qualifications such as workload, learning outcomes and type of qualification. These technical dimensions are important for formal recognition. Informal recognition by employers does not require this detailed information and is often influenced by aspects such as reputation or familiarity with a system.
3. It will take time before frameworks become widely established – this breadth of use is a requirement for their use for recognition.
4. There seems to be a willingness to ensure that coherent formal recognition strategies are carried out by designated bodies with clear and transparent procedures and with a facility for appeal against decisions made (for example Denmark or Ireland). In Australia this procedure is strongly linked to immigration. Consequently, qualifications frameworks could have a stronger role to play in bringing coherence to recognition strategies.
5. There is likely to be continued growth in the demand for formal as well as 'informal'<sup>1</sup> recognition of foreign qualifications (there is growing student and workers' mobility). The demand concerns a variety of qualifications systems, types and fields of study and thus requires the use of systematic tools (such as frameworks) for recognition.

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<sup>1</sup> Informal recognition refers to recognition that does not result in an official paper/document which states that a given foreign qualification is recognised in the host country but for example the recognition done by employers at recruitment

6. There is a possibility that countries will increasingly put in place stronger linkages between qualifications recognition and immigration rules thus creating more demand for qualification recognition.
7. Greater demand could bring greater familiarity with foreign qualifications, greater development of international databases on comparability of qualifications, and the detailed procedure of qualification recognition may become less used.
8. Frameworks will lead to internal clarification of relationships between qualifications, which will have positive effect on the way qualifications from a given system are presented abroad.
9. The main reference for recognition is the host country qualification system. Therefore, if no equivalent qualifications exist in the host system (in terms of type or profile), it remains difficult to actually recognise a qualifications as an equivalent to an existing host country qualification. However, some countries issue statements about the level at which the incoming qualification could be placed in the host system even if there is no equivalent qualification in the host country.
10. If the NQF development process focuses solely on the relationships between qualifications within a country, there is a risk of inconsistencies developing in positioning of qualifications in transnational terms. Some qualifications, in particular school-leaving general education qualifications, are already, in practice, broadly recognised as equivalent for access to higher education. If the NQF developments place these at levels that do not compare such development could be counter-productive.
11. Frameworks are closely associated with the existence of databases or registers of qualifications. These are useful tools for qualification recognition. They provide summary information on aspects such as: the content of the qualification, the profession(s) for which it prepares, or the fact that the qualification is nationally recognised.
12. To make frameworks become part of the toolbox for qualification recognition, there is a need to communicate to a range of actors in charge including employers and HEIs. Their awareness of and understanding of frameworks cannot be taken for granted.
13. There is a need to provide information about qualification recognition possibilities and opportunities to the individuals. This will not be achieved by the frameworks alone and there is a risk that frameworks might lead to the misunderstanding of the general role of NQF levels. For example individuals could take them at face value and presume they offer entitlements.
14. An important element for qualification recognition is the profession for which a qualification prepares or information about what the qualification enables a person to do in his/her own country. This is not captured by qualifications frameworks even though it can be at least partly reflected in the learning outcomes used and encouraged by the use of frameworks. It is also possible for qualifications frameworks, in particular the qualifications databases or registers that underpin these, to be related to labour market information systems.
15. Qualifications frameworks are often underpinned by quality assurance procedures. These can improve trust and hence qualifications recognition. But this can only work if these quality assurance procedures are solid and transparent.
16. Qualification recognition is somewhat difficult in the area of vocational or professional qualifications as there is a greater diversity of systems and structures among countries. Qualifications frameworks are expected to improve the legibility of foreign qualifications systems and thus better appreciate these qualifications.

### Possibilities and opportunities for linking AQF and EQF

It is highly unlikely that two major frameworks such as the EQF and the AQF would co-exist without any sort of linkages developing, especially given the high mobility flows between Europe and Australia. Sooner or later, some form of linkages will develop, formally or informally. Some links already exist, as some European NQFs (Ireland) or some systems (that are referenced to the EQF) have identified how the AQF relates to the NQF or how AQF qualifications (e.g. in the Danish qualifications recognition database) refer to the national qualifications system. Therefore the question is rather about the nature of the linkages and their status. Furthermore, there could be a policy opportunity in linking the two frameworks and thus strengthening their visibility and potential impact.

The study identifies ten possibilities for linking the two instruments (see table below).

Possible approach to linkage	Outline
<b>1. Full legal linkage</b>	The AQF links to the EQF in the same way as an NQF from an EU Member State, following the requirements of the EQF Recommendation of 2008.
<b>2. Mutual recognition</b>	Each framework authority endorses the other in terms of its own framework, meaning that each of them issues a statement which concerns how the other framework relates to the home framework. A common declaration is made.
<b>3. Bilateral declaration</b>	Each framework authority endorses the other in terms of its own framework. Each makes an independent declaration
<b>4. Unilateral declaration</b>	A framework authority uses evidence to make a statement about linkage to another framework
<b>5. Promotion and engagement</b>	No formal level-to-level linkage but cooperation at expert level, research and reports, mutual promotion of the other framework. Could lead to a <i>de facto</i> alignment based on custom and practice.
<b>6. Independent review</b>	Research is commissioned from an international body to look at linkage and a report is published
<b>7. Sector by sector linkage</b>	Partial framework links in an education and training sector, for example higher education, VET or general education
<b>8. Bilateral periodic review</b>	On a periodic basis, authorities cooperate to review the informal relationships between the frameworks
<b>9. Extended dialogue</b>	Ongoing dialogue between framework leaders on the relationships between the frameworks
<b>10. Laissez faire</b>	Allow informal linkages to develop

This speculative analysis indicates that it is possible to establish a direct, formal level-to-level 'technical' link between the two frameworks. This would be the most formal linkage option. At the other end of the spectrum is the possibility of a linkage that is based on informal arrangements made by individuals, private companies, learning institutions and any other entities that consider a relationship between levels in the two frameworks helpful for them.

The possibilities for linking the AQF and the EQF are many but for any of them to be useful for practitioners and users, it is necessary, for the sake of all users, to enable the establishment of a zone of trust between the two frameworks. In such a zone of trust, the established linkages should acquire general support from governments, its agencies, businesses that recruit across boundaries, providers of learning and the range of less formal users of qualifications and levels.

The two frameworks have much in common, but there are also major differences that are discussed in this report. The uses of the two frameworks are also fundamentally different and are a response to the national and international settings in which they have been developed. For example the EQF relates to a single labour market in a group of countries where there is free migration, the AQF by contrast relates to a labour market where controlled recruitment from abroad is the norm, qualifications recognition is an active and crucial element in the Australian immigration process.

The analysis suggests that a relationship between EQF and AQF would add value for both framework communities and the option of doing nothing and allowing potentially confusing informal relationships to develop is not in the interests of either region.

The main conclusion reached by the study suggests that a common statement ('Qualification Framework Accord') should set out the possibilities and the limitations of a programme of constructive engagement between the stakeholders of the two frameworks. This study identified the opportunities and possible options. It is now for the policy makers and the stakeholders to assess which options are

most desirable as well as feasible. The primary objective of the statement should be exchange and the building of trust and understanding. It is possible, but by no means certain, that a formal level-to level linkage between the two frameworks could emerge from this engagement and trust building. The different options need to be critically assessed and that should be researched through a participative exchange of stakeholders concerned.

In summary, the exploration of possibilities for developing a relationship between EQF and AQF, as set out in this study, leads to the conclusion that:

- There are significant potential gains for both Europe and Australia in developing an appropriate relationship, possibly termed a 'Qualifications Framework Accord' between EQF and AQF;
- The option of doing nothing and allowing potentially confusing informal relativities to develop is not in the interests of either region;
- The establishment of a linkage along the lines of a Qualifications Framework Accord involving these frameworks is technically feasible;
- The Qualifications Framework Accord would be a signal of the intention to develop a zone of trust as the EQF project moves to completion and AQF's new system of levels, titles and qualification types becomes embedded in national practice.

The use of level in qualification recognition is shown to be just one element in the recognition procedure; the report suggests that there would be value in exploring how a common language for the other important recognition factors (such as qualification types, learning outcomes, credit, professions etc.) might be developed.

Some key questions arise from the report that need to be examined in depth, for example which of the scenarios in the table above holds most value when all factors such as added value, risk and resources are taken into account?