PEER LEARNING ACTIVITY ‘NQFS ON THE GO: ALLOCATION OF QUALIFICATIONS TO LEVELS’

16-17 March 2015, Warsaw, Poland

Summary report

CONTENTS

1 Introduction........................................................................................................................................... 2
2 PLA structure and Process .................................................................................................................. 3
3 Introduction to the PLA ..................................................................................................................... 6
4 Workshop Sessions ............................................................................................................................ 8
5 Aligning levels of qualifications systems: the case and experiences of the EQF-Hong kong QF 16
6 Round table 1: How can the allocation of qualifications to NQF levels be done in a transparent and trustworthy way? ......................................................................................................................... 17
7 Round table 2: How can guidance on criteria 2 and 4 be improved? ............................................. 19
8 Conclusions and recommendations to inform the ongoing referencing ........................................ 20
Annex A – Agenda ................................................................................................................................ 22
Annex B – EQF Referencing criteria .................................................................................................... 23
1 INTRODUCTION

On 16 and 17 March 2015, a Peer Learning Activity (PLA) was held in Warsaw, Poland, focusing on ‘NQFs on the go: Allocation of qualifications to levels’.

This PLA was hosted by the Educational Research Institute (IBE), Poland, in cooperation with the Educational Authority of Hungary, the European Commission and Cedefop. The event was attended by more than 70 participants from various European countries.

PLA objectives

The aim of this PLA was to take stock of the experiences acquired during the first referencing period in assigning NQF levels to qualifications and referencing national qualifications frameworks (NQF) to the European Qualifications Framework (EQF) levels; and to take a closer look at the use of EQF referencing criteria 2 (clear and demonstrable links between national qualifications and the EQF level descriptors) and 4 (procedures for inclusion of qualifications in the NQF or for describing the place of qualifications in the national qualification system are transparent)¹.

The main objectives of the PLA were thus to allow delegates to exchange views and experiences on

- how the levelling of qualifications can be done in a transparent way; and on
- how the levelling of qualifications can improve trust and have an impact on employability.

In particular, this PLA sought to provide an opportunity to reflect upon the process of allocation of qualifications to levels and to help developing a consistent approach to the challenge of comparable levels for qualifications in Europe.

Purpose of this report

This report summarises the discussions that took place during the PLA. It is written for a wider audience than those who participated in the PLA in order to share information with the wide range of organisations and bodies involved in implementing national qualifications frameworks and referencing qualifications levels to the EQF.

This report should be used to support the work of the Commission and participants in the PLA in disseminating the results of the activities of the PLA to countries’ stakeholders and other social partners.

The report is structured according to the objectives of the PLA and draws on a range of presentations, country cases and workshop discussions that formed the PLA. A full list of the agenda for the PLA is included in Annex A.

¹ The list of ten EQF referencing criteria is included in Annex B.
PLA STRUCTURE AND PROCESS

Day 1

Day 1 began with a welcoming address by the hosts and co-hosts of this event. Ewa Dudek (Ministry of National Education, Poland) referred to the considerable effort undertaken in Poland to implement the National Qualifications Framework, to redesign curricula and the ongoing work on the validation of non-formal and informal learning. She underlined that this work draws considerable benefit from peer learning, mutual exchange and the identification of examples of good practice.

Susanne Lonscher-Räcke (European Commission) underlined that the presentation of EQF referencing reports to the EQF Advisory Group is to be considered as a starting point. Continuous and ongoing work is required for the EQF to be able to unfold its full potential of creating transparency and comparability of qualifications.

Agnieszka Chłoń-Domińczak (IBE) emphasised the status of the EQF as a joint initiative of countries and briefly introduced the Polish approach towards the levelling of qualifications. One major element of this approach is the development of sectoral qualifications frameworks, which can then be referred to the Polish Qualifications Framework.

Erzsébet Szlamka (Educational Authority of Hungary) pointed out why it is particular important to discuss this topic – the allocation of qualifications to levels – at this particular point in time. With 27 EQF referencing reports already presented to the EQF Advisory Group, this is an opportunity to reflect and draw on a large pool of experience. These lessons learned can support countries in facing some of the future challenges related to NQF implementation, such as the inclusion of non-formal qualifications into NQFs and a more in-depth exploration of referencing criterion 4.

In the first input presentation, Jens Bjørnavold (Cedefop) discussed the experience and lessons learned from the first 27 referencing reports presented to the EQF Advisory Group. While the achievements are evident and undisputed, the presentation of the first 27 EQF referencing reports also identified several challenges. Very often, these challenges relate to the link between national qualifications levels and EQF level descriptors, and to the criteria and procedures applied for the inclusion of qualifications in NQFs. Information on these very important aspects is often missing from reports or insufficiently described, which reduces transparency and comparability.

Brigitte Bouquet (CNCP), in her presentation, reflected on the risks and benefits of having qualifications without a level within a country’s national qualifications system. She described the French approach. She presented the example of France, where a separate registry – the ‘Inventaire’ – is in place to accommodate qualifications which, for a given reason, do not fulfil the requirements to be allocated to a NQF level.

After these plenary presentations, participants were invited to attend one of three parallel workshop sessions which were held in the afternoon, each one focussing on a different aspect of levelling of qualifications. Each workshop session started with two to three presentations of (national) case studies, followed by group discussions. Group 1 discussed the role of stakeholders in levelling qualifications. Group 2 reflected on creating a method for the levelling of qualifications. Group 3 discussed which aspects should (or should not) be taken into consideration when levelling qualifications.

Day 2

Day 2 began with a presentation on the Hong Kong Qualifications Frameworks, thus bringing in an external perspective into the discussion on levelling qualifications. Yee Wah Cheng, administrator of the Hong Kong Qualifications Framework Secretariat presented the main characteristics of the HKQF and provided an overview of the ongoing work exploring the possibilities for technical alignment between the HKQF and the EQF.
This was followed by a summary of the presentations and discussions of the workshop sessions held on Day 1, in which workshop rapporteurs reflected on the main points of discussion and key messages raised in their workshops.

Afterwards, participants worked in small groups to discuss and develop recommendations and suggestions on how to take forward the issue of levelling qualifications.

To conclude the peer learning activity, Mike Coles presented a synthesis of the conclusions and recommendations, and reflected on how the outcomes of this PLA could be used to inform the ongoing EQF referencing process.

Key messages from the PLA

The main key messages from this PLA can be summarised as follows:

- **Referencing reports are doing their job** at the moment. Despite their weaknesses, they are perceived as a solid tool that helps understand what is happening in different countries. The presentation of an EQF referencing report cannot and should not be considered as the finish line. Referencing must be understood as an **ongoing, continuous process**.

- **Point of departure.** The referencing process has significantly improved in past few years. Even though there are some counties left to present their referencing report, a point of departure has been reached, leading into a new stage of referencing. This new phase in the European process, which will more strongly than before focus on a review role, could be taken as an **opportunity to define the role of stakeholders** more clearly, in particular for the ongoing referencing (or second wave of referencing).

- EQF referencing reports should clearly state the **scope of qualifications included** (and which qualifications have not been included), and on which basis this decision was taken.

- **Links between criteria:** Referencing criteria should not be addressed in isolation, but should be considered in relation to each other. Criterion 4 cannot be sufficiently addressed without providing a sound approach for addressing criterion 2, and both are strongly linked to criterion 3.

- The **honest and transparent dealing with problems and weaknesses** encountered is a distinguishing characteristic of an EQF referencing report, as it contributes to the development of mutual trust.

- It is important to make sure that there is a **common understanding** across countries of the terminology used in the EQF context.

**Allocation of qualifications to levels:**

- The **focus on the quality of sustainable stakeholder engagement and consensus building** is both key issue and challenge. Mutual trust cannot be achieved on a technical basis. It requires involvement and discussion.

- There is no single correct and right procedure, rule or method to allocate qualifications to levels. Also, a chosen procedure cannot expected to be valid forever.

- The linguistic approach is important, but there is the need to understand the underlying intention. From experience, this cannot be achieved through a linguistic/technical approach alone.

- Focus on the bigger picture: In many cases, a **concise and clear description of the learning outcomes of a qualification** will be sufficient for the allocation to a level (loosely following the example of a certificate supplement, for example).
- **Levelling of ‘blocks’ of qualifications vs. single qualifications**: Each method has its strengths and weaknesses. The choice of method should reflect what works best at national level and best matches the realities of the respective national system.

- **Use of subsidiary criteria for levelling – transparency is key**: The use of subsidiary criteria for allocation can be helpful, in particular when clear learning outcomes descriptions are not available (examples: duration of training, comparison with other qualifications, labour market value). However: Indicators should not be mistaken for evidence. And learning outcomes should remain the decisive criterion for allocation.

**Issues to be further explored/discussed:**

- **Better understanding the vertical dimension**: To understand how countries distinguish between different levels – the conception of levels - is very important and a key aspect in understanding the qualifications framework of a country. The expression of growing complexity and distinction between levels has rarely been systematically addressed (e.g. How are action verbs used to differentiate between levels?).

- **Is there a risk for the EQF to become too normative and too influential on NQFs? Is there a risk of going into too much detail?**

- **'What is good enough?'** A central question is what is ‘good enough’ - technically, conceptually, politically and socially - in order to have a strong and credible referencing process. Referencing reports so far have been quite extensive, but still missed out important aspects. How to determine the aspects which are essential to understand a country’s referencing?

- **Levelling is an ongoing and incremental process.** There is support for some form of (peer) review process that will enhance the quality of the levelling process in the future.

- **There is support for some form of (non-prescriptive) guidelines/checklist** to improve guidance on criteria 2 and 4.
INTRODUCTION TO THE PLA

Referencing to the EQF – Lessons learnt (cf. ppt)

Jens Bjørnavold (Cedefop) presented the experience from the first wave of EQF referencing reports, and in his presentation in particular focused on the allocation of qualifications to NQF levels, and the alignment of NQF levels to EQF levels/referencing criteria 2, 3 and 4.²

Between September 2009 and January 2015, 27 EQF referencing reports were presented to the EQF Advisory Group (for three of them, the referencing is still pending). 11 countries are yet to present their EQF referencing reports. The first stage of the EQF referencing process is thus reaching its final stage, and Cedefop took this as an opportunity to reflect on the lessons learned from the first 27 referencing reports.

The EQF referencing process incontestably acted as a catalyst for NQF development in many countries. The peer review approach applied is considered as an important element for the creation of mutual trust between countries, to help countries understand the foundations education and training systems in a given country.

On the other hand, the presentation of the first 27 EQF referencing reports also identified several challenges. First, many reports are work in progress, and the information contained is often incomplete. It is in particular in relation to referencing criteria 2, 3 and 4 (and their link to criterion 5) that information is frequently missing or not sufficiently described. One major point of criticism with many reports was that they do not clearly describe the scope, i.e. it is often not clear which qualifications are included or not. Furthermore, it is often not clear from the reports how different referencing criteria link to and influence each other.

As regard criterion 2, countries have clearly given priority to demonstrate the linguistic/terminological links between NQF and EQF descriptors, thereby somehow neglecting to explicitly discuss the structural and conceptual aspects. The resulting lack of clarity with respect to the horizontal and vertical dimensions of level descriptors thus undermines the application of the best-fit approach.

Concerning criterion 3, the actual degree of implementation of the learning outcomes principle is difficult to judge, as referencing reports often refer to plans and intentions rather than to realities. Most referencing reports do not address the link between the learning outcomes approach and quality assurance.

As for criterion 4, many countries only refer to the legal basis for the levelling of qualifications, which is clearly not sufficient. Many referencing reports fail to clearly illustrate the criteria and procedures applied for allocating qualifications to levels, undermining comparability. Very few reports clearly illustrate the balance between a learning outcomes based levelling of qualifications and the consideration of additional (e.g. political, social) aspects in levelling.

Although criterion 5, which refers to quality assurance, has been sufficiently addressed by most countries so far, it would be important for countries to further explore and address to its link with criteria 3 and 4.

² The list of ten EQF referencing criteria is included in Annex B.
‘Qualifications in national qualifications systems without a level – a threat or an opportunity?’ (cf. ppt)

Brigitte Bouquet (CNCP, FR), in her presentation, weighed in on the risks and benefits of having qualifications without a level within a country’s national qualifications system. She presented the French example of the ‘Inventaire’. The ‘Inventaire’ is a separate registry for qualifications which, for a given reason, do not fulfil the requirements to be allocated to a NQF level. Examples of qualifications which can be included are international qualifications and professional licences. The ‘Inventaire’ thus provides a platform for qualifications that cannot be allocated to a NQF level but which are still considered important and valuable qualifications. The origin of a qualification (i.e. whether it is from the formal or non-formal sector) is not relevant for inclusion into the ‘Inventaire’.

This also led to an interesting exchange between participants on the inclusivity/exclusivity of NQFs and its implications on the (perceived) value of qualifications, and about the number and types of qualifications that are NOT included in an NQF.
WORKSHOP SESSIONS

After the plenary presentations, participants were invited to attend one of three parallel workshop sessions which were held in the afternoon, each one focusing on a different aspect of levelling of qualifications. Before starting the workshop sessions, Mike Coles briefly introduced the main focus of the workshops and the aspects to be discussed by the participants. The main focus of the workshops can be summarised by the following three questions:

- What are the foundations of transparency and reliability of the process of allocating qualifications to levels?
- How should the stakeholders be involved in allocating qualifications to levels?
- How should the referencing criterion 4 be used in the second wave of referencing?

These aspects play an elementary role for the transparency and comparability of qualifications across Europe.

Each workshop session started with two to three presentations of (national) case studies, followed by group discussions. Group 1 discussed the role of stakeholders in levelling qualifications. Group 2 reflected on creating a method for the levelling of qualifications. Group 3 discussed which aspects should (or should not) be taken into consideration when levelling qualifications.

**Workshop 1: What should be the role of stakeholders in levelling qualifications?**

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<thead>
<tr>
<th>Scotland</th>
<th>Pauline Sutton, SQCF</th>
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<tr>
<td><strong>'SCQF Approach to engaging stakeholders’</strong></td>
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<td>The Scottish qualifications framework (SCQF) has operated since 2001. The SCQF is an ‘open framework’ in the sense that it explicitly addresses the private sector and employers, and encourages these to have their training provisions accredited and included under the framework.</td>
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<td>For a qualification or learning programme to be included in the SCQF, it must fulfill the following requirements: at least 10 notional learning hours; based on learning outcomes; formally assessed; internally and externally quality assured. Next to 11,500 ‘traditional’ qualifications (from school, further education, higher education, apprenticeships, work-based), the SCQF also includes circa 600 ‘other’ qualifications, developed by professional bodies, employers and social partners for their staff or learners.</td>
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<td>As SCQF’s stakeholders are considered: National Qualifications Authority (SQA); universities; further education colleges; schools, parents, carers; businesses; social partners. The involvement in the levelling process depends on the type of stakeholder (e.g. whether they are a credit rating body or a social partner). SCQF provides training (workshops) and actively tries to encourage an open dialogue on the levelling of qualifications.</td>
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<tr>
<th>France</th>
<th>Brigitte Bouquet, CNCP</th>
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<td><strong>'The Registration of Qualifications in the French Qualifications Framework’</strong></td>
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<td>In order for a qualification to be registered in the national register of vocational qualifications (Répertoire national de certifications professionnelles, RNCP), it must allow for the validation of non-formal and informal learning (‘validation des acquis de l’expérience’, VAE). The process of registration is based on systematic cooperation between public authorities and different stakeholder groups, such as social partners or economic chambers.</td>
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**Guiding questions:**

- Which stakeholder groups should be involved in allocating qualifications to NQF levels?
- What should be the role(s) of the different stakeholder groups?
- Should stakeholders be responsible for allocating qualification to a level?
- What information and data do the different stakeholder groups need?
- What are the ways to engage stakeholders in the process of allocating levels to qualifications?
- How can stakeholder groups be properly engaged in the process of best fit?
- How can the collective views of stakeholder groups be presented to others (whether accepted or not), including in the national referencing report.

**Key points:**

*General remarks on stakeholder involvement:*

- Two key aspects of stakeholder involvement are: first, to make sure that (groups of) stakeholders are involved appropriately. Second, to make sure that the groups of stakeholders are appropriately prepared/trained for their task.
- The degree of stakeholder involvement significantly differs across countries. This also depends on a country’s progress in NQF implementation and the degree of implementation of the learning outcomes approach.
- In some countries, stakeholder involvement has been embedded into the system as an integral component for a long time. In other countries, however, it is a major challenge to approach stakeholder groups and to secure their role in the process.
- It is difficult for many countries to achieve a high level of stakeholder involvement, to go from mere consultation to active forms of engagement.
- Governments as facilitators: The role of the national government in engaging stakeholders can be important.

*Groups of stakeholders:*

- The term 'stakeholder' is very broad and unspecific. It is suggested to define and refer to different stakeholder groups. For different stages of the levelling process, different groups might have to be approached.
It is important for the relevant groups of stakeholders to feel involved in the process, to develop a certain sense of ownership.

Information requirements of stakeholders:

- Stakeholder groups will have the respective sectoral expertise, but they will not necessarily be familiar with NQP/EQF processes or the learning outcomes approach. This must be taken into consideration. At the same time, type and quantity of information to be provided to stakeholder groups should be carefully chosen – it will not be necessary for them to know about every technical detail of the process to be able to fulfill their role.

- While stakeholders do not necessarily need to know about every technical detail of the process, it is important that they understand the qualification(s), the levels and the process. It should be avoided that stakeholders just use the process as a tool to push their particular interests.

Aspects to be further explored:

- EQF National Coordination Points could play a role in preparing the different stakeholder groups for their involvement in the process.

- There would be support for some kind of international forum for exchange.
Workshop 2: What do recent activities tell us about creating a method for levelling?

**Session chaired by Susanne Lonscher-Räcke, European Commission**

**Rapporteur: Tomasz Saryusz-Wolski, IBE**

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<tr>
<th>FYROM, RS, AL</th>
<th>Eduarda Castel-Branco &amp; Mirjam de Jong,</th>
<th>‘Inventory and Analysis of Qualifications. Supporting Decisions on Inclusion of Qualifications in an NQF.’</th>
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<td>ETF provides advice, expertise, knowledge-sharing for the reform of (transition and development) countries’ qualifications systems. The aims of such reforms are to support lifelong learning, to develop an outcomes-based approach, to secure the engagement of stakeholders (e.g. trade unions, employers) and to intensify work on QA systems. In 2015, ETF is working with 18 different countries. Examples from the Former Yugoslav Republic of Macedonia, Serbia and Albania were presented, to show how they go about establishing an inventory and analysis for qualifications for their inclusion in the NQF:</td>
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<td>ETF also maintains the Qualifications Platform (‘qp’), an online, worldwide community for people working on qualifications. <a href="http://www.qualificationsplatform.net">www.qualificationsplatform.net</a></td>
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<tr>
<td>Poland</td>
<td>Wojciech Stęchły, IBE</td>
<td>‘Levelling qualifications in Poland, 2012-2013’</td>
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<td>The initial process of levelling qualifications in Poland was carried out in three different stages, between 2012 and 2013. In stage one, four working groups (representing different economic sectors), developed four initial proposals for ‘rules of levelling’ qualifications in Poland. In stage two, these proposals were discussed, and a joint proposal for a levelling method was prepared. In stage three, this proposal was verified, and the PQF level for 350 qualifications was determined. In total, 14 sectoral teams of experts were active in the levelling of qualifications. In total, 80 work meetings were required, with a total number of 74 stakeholder representatives contributing to the process (including training institutions, examination centres, employers, craft chambers, training companies and teachers.)</td>
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<tr>
<td>Hungary</td>
<td>András Derényi, Educational Authority Hungary</td>
<td>‘What do recent activities tell us about creating a method for levelling? The case of Hungary’</td>
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<td>Hungary presented its EQF referencing report to the EQF Advisory Group in February 2015, after almost a decade of development work. Some of the main challenges to the process were low levels of knowledge and openness towards using learning outcomes and the highly project-driven development.</td>
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<td>A qualification must fulfil two requirements in order to be allocated to the NQF: It must fulfil the requirements of a ‘qualification’, and it must be described in terms of learning outcomes. Hungary applied a combination of individual and ‘block’ allocation approaches, depending on the type of qualifications. For Bachelor’s and Master’s degrees in higher education, ‘blocks’ of qualifications were allocated to NQF levels. With VET qualifications, however, each qualification was allocated individually. Linguistic (semantic) analysis alone has proven to be insufficient as single determinant of a qualifications level. Experience has shown that additional consideration of social judgement end employment practice can make an allocation decision more trustful and accepted, also among social partners.</td>
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**Guiding questions:**

- How can we avoid subjective decisions about allocating qualifications to NQF levels?
- To what extent does a method for levelling qualifications need to be formalised? Are there stages of the process that can be distinguished? Is it helpful to design a stepwise method?
- What are the parts of methodologies that are used for allocating qualifications to levels?
How can an outcome of an allocation of a qualification be tested or verified?

What can be done (after allocation) to ensure a better fit of a qualification to a level?

How can the allocation of qualifications be presented so that it is likely to generate maximum trust in the decision, especially in cases where best fit has been applied?

Are there rules for the allocation of unitised qualifications to NQF levels when the units that make up the qualification are at different levels?

Key points:

- The levelling of qualifications is not to be understood as a mathematical exercise. The rules of mathematics cannot be applied.

- The levelling of qualifications should be based on the analysis of documentation (learning outcomes, plus additional information). Experience has shown that qualifications can also be (conditionally) levelled if they are not based on learning outcomes, provided that sufficient documentation is available.

- The levelling of groups (or 'blocks') of qualifications is considered feasible if there are common standards and QA for this group.

- The levelling process has to be quality assured. The levelling of qualifications should be repeated; it should not be considered as a one-off exercise.

In addition, the workshop group also developed a set of ‘possible general parts of a process of levelling qualifications to a NQF level’. Refer to Section 8 of this report for further information.
Workshop 3: What should or should not be taken into account in levelling qualifications?

**Germany**

Sabine Schüller & Thomas Reglin

‘Allocation of qualifications to levels – the German approach’

The German DQF has been designed as a comprehensive framework, including qualifications from all sectors of learning, including general education, vocational education and training, and higher education (although general education has not been included so far). The DQF has already had an impact at the national level; it has helped to increase transparency of the otherwise rather complex German system. The DQF has helped to show, for example, that VET in Germany is much more than just the dual system.

In Germany, qualifications are allocated to DQF levels as ‘blocks’ of qualifications rather than individual qualifications (see the Swiss example below for a different approach). In Germany, a clear allocation of a qualification based on primary sources often proved to be difficult and led to deviations of up to one NQF level. In order to better inform the levelling decision, subsidiary criteria were taken into account, such as access requirements, duration of learning, field of activity and position in company hierarchies, consensus across educational sectors. Learning outcomes, however, remained the decisive criterion for allocation.

**Switzerland**

Sarah Daepp & Sandra Müller, SERI

‘Allocation of qualifications to levels – the Swiss approach’

The Swiss NQF VPET is a partial qualifications framework, covering formal vocational and professional qualifications only. The NQF VPET is an eight-level framework, based on learning outcomes, described in terms of knowledge, skills and competence. The allocation of qualifications to NQF VPET levels will be carried out individually for all 730 formal VPET qualifications, over the next three years. Thus, the framework currently does not include any qualifications yet.

What is taken into account for the allocation of qualifications to NQF VPET levels? Learning outcomes descriptions of individual qualifications (descriptions in curricula). These qualifications are formal, adopted at State level and contain the same learning outcomes nation-wide. The allocation is carried out individually for all qualifications, there is thus no ‘block’ allocation of qualifications (e.g. as opposed to the German example above). In case of ambiguity, the learning outcomes of content-related qualifications are taken into account, in order to determine the difference in complexity between them.

What is NOT taken into account for the allocation of qualifications to NQF VPET levels? Credit value; assessment criteria; levels of units.  

Guiding questions:

- How can learning outcomes be formulated so that they help allocating qualifications to NQF levels?
- How can information about qualifications that are not yet based on learning outcomes be transformed so that the implicit learning outcomes associated with the qualification are in the most useful form?
- How can credit value and units of learning outcomes be helpful in the process?

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3 NB: These are examples to underline what is not taken into account. There is actually no credit system for VPET, and they do not use units.
How could future reform plans for qualification types be used to allocating qualifications to levels?

How can socially accepted positions about the level of a qualification be acknowledged in a levelling process?

How can information on another qualification type be used to make decisions about the level of a qualification?

How can the levelling of a similar qualification from another country be used to make decisions about the level of a qualification?

Is it necessary/possible to link formal qualifications with the same methodology as non-formal qualifications?

Key points:

- A combination of approaches/criteria for the allocation of qualifications to levels can make the process easier, in particular when the learning outcomes process has not been fully implemented.

- Solid documentation: A transparent and detailed documentation makes allocation decisions comprehensible and (if required) corrigeable.

- Writing of learning outcomes for qualifications: The level of abstraction is important. A different (i.e. lower) level of abstraction is needed for designing curricula than for level allocation.

- Focus on the bigger picture: In many cases, a concise and clear description of the learning outcomes of a qualification will be sufficient for the allocation to a level (loosely following the example of a certificate supplement, for example). In most cases, the often very detailed learning outcomes descriptions included in curricula will not be needed for level allocation.

- In case of doubt or ambiguity, assessment criteria connected to learning outcomes can be a useful supplementary source for the determination of the level of a qualification. There are examples where learning outcomes appear to be similar, but a closer look at assessment criteria reveals that they refer to different levels.

- Non-formal qualifications should be linked/levelled using the same methodology as formal qualifications: the core of the methodology should be the same (e.g. learning outcomes, quality assurance), but then some flexibility should be allowed. Furthermore, the sector of non-formal qualifications is a very nontransparent sector of qualifications in some countries – more than one solution for the process might be needed.

- Subsidiary criteria can be used to better inform a levelling decision, in particular when the learning outcomes approach is not yet fully implemented or if there is ambiguity about the level of a particular qualifications. Learning outcomes, however, must remain the decisive criterion for allocation.

- Examples of subsidiary criteria: access requirements, duration of learning, field of activity and position in company hierarchies, consensus across educational sectors, content-related qualifications.

- Levelling of similar foreign qualifications: Countries do not operate in isolation and are aware of the levelling decisions of other countries. It is however necessary to have a very sound knowledge of the other systems in order to fully understand their considerations.
The consideration of **socially accepted positions** about the level of a qualification is viewed upon critically for several reasons. It should be kept in mind, however, that even in linguistic comparison, the interpretation will be influenced by social values.

**Further aspects:**

- **Requirements for a qualification** to be included in an NQF: It is important for countries to clearly define, at national level, what can be considered as a qualification which is eligible for inclusion in the NQF. This definition certainly does not have to be the same across countries, but it should be clearly communicated to other countries.

- **Intended and achieved learning outcomes.** In the future, it will be interesting to see how the review process linked to qualifications evolves, and to which extent this informs the feedback between intended and achieved learning outcomes.

- **Communication to end users:** It is important to take care of what information concerning qualifications levels is communicated to end users. They should not be made to believe that if two qualifications have the same level, they will automatically entail the same rights.
ALIGNING LEVELS OF QUALIFICATIONS SYSTEMS: THE CASE AND EXPERIENCES OF THE EQF-HONG KONG QF

Yee Wah Cheng, administrator of the Hong Kong Qualifications Framework Secretariat presented the main characteristics of the Hong Kong Qualifications Framework (HKQF) and provided an overview of the ongoing work exploring the possibilities for technical alignment between the HKQF and the EQF.

Although Hong Kong enjoys a high level of economic prosperity, the average level of educational attainment within its population is not extraordinarily high. This can partly be traced to the still rather elitist higher education system, which was largely shaped by the British system.

Conceptual work on the HKQF started already in 2000. In 2008, it was formally launched. Its two central objectives are: to establish an effective platform to support lifelong learning; and to enhance capability and competitiveness of local workforce.

The HKQF is a unitary framework, covering academic, vocational and continuing education sectors. It comprises seven levels, defined by generic level descriptors (GLD), which are described in terms of learning outcomes. GLD cover four domains: knowledge and intellectual skills; processes; application, autonomy and accountability; communication, IT and numeracy. All HKQF-recognised qualifications are recorded in a public web-based qualifications register, which currently lists over 8,000 qualifications. Industry participation is secured through Industry Training Advisory Committees (ITAC), which are set up for 20 industries.

Hong Kong actively works to establish a closer collaboration on qualifications frameworks with other countries, such as with Scotland, New Zealand, Thailand, ASEAN and China (the latter however does not have a qualifications framework). The HKQF/EQF alignment project, which is currently ongoing, intends to establish a level-to-level relationship between the HKQF and EQF. In the current stage of the project, a detailed linguistic analysis of level descriptors is being carried. Results of the HKQF/EQF alignment project are expected for autumn 2015.
ROUND TABLE 1: HOW CAN THE ALLOCATION OF QUALIFICATIONS TO NQF LEVELS BE DONE IN A TRANSPARENT AND TRUSTWORTHY WAY?

Participants were asked to work in small groups to discuss the following question:

‘How can the allocation of qualifications to NQF levels be done in a transparent and trustworthy way to facilitate mobility in education and labour markets, nationally and internationally?’

Each group was given 30 minutes to discuss this question, and to develop ideas and suggestions. Afterwards, each group presented their outcomes.

Key messages from this session:

Referencing as an ongoing process:

- The presentation of an EQF referencing report cannot and should not be considered as the finish line. Instead, initial referencing has many countries just gotten up to the starting line. Referencing must be understood as an ongoing, continuous process.
- There is support for some form of peer review process that will enhance the quality of the levelling process in the future (to learn from the first referencing, to accumulate experience and become aware of one’s own mistakes).
- With awarding bodies, QA systems becoming increasingly mobile, and the practically borderless MOOCs, there might be a need to re-conceptualise the notion of mobility, to take account not just of individual mobility but also of institutional mobility.
- It is important to consider that there are other European tools or directives that somehow relate to the EQF (e.g. recognition).

Methods of levelling:

- Trustworthy allocation requires solid descriptors, good qualifications and good learning outcomes. If the descriptors and/or qualifications are fuzzy, so is the levelling going to be.
- There is no ‘perfect’ method for the levelling of qualifications; this is a process without a finish line.
- How transparent and how democratic this process is, is not just an issue at national level. This has an impact on the European process as well.

- Levelling of ‘blocks’ of qualifications vs. single qualifications
  Each method has its strengths and weaknesses. The choice of method should reflect what works best at national level and best matches the realities of the respective national system. Open question: Do different rules apply depending on whether countries allocate individual or groups of qualifications to levels?

- Use of subsidiary criteria for levelling – transparency is key: When countries make use of subsidiary criteria for the allocation of qualifications to levels (in addition to the consideration of learning outcomes), this should be made explicit. The combination of criteria for levelling used should be clearly explained. It should be made clear how these criteria are used to distinguish between levels.

- The relation between qualifications and qualifications levels is an important aspect to understand the concept applied by a country. There are differences in understanding across countries in understanding the relation between qualifications and levels, which may stem from philosophical perspectives and/or systemic differences between countries. Is the qualification allocated to the level, or is a level ascribed to the qualification?
Stakeholder involvement:

- The **focus on the quality of sustainable stakeholder engagement and consensus building** is both key issue and challenge. Mutual trust cannot be achieved on a technical basis. It requires involvement and discussion.

- The level of stakeholder involvement differs significantly across countries. In several cases, the involvement of stakeholders is symbolic only, and they do not have a real possibility to influence the process. How to proceed when stakeholders are weak?

- In the current European process, the need to involve stakeholders, and their exact role, are not explicitly stated. Not all stakeholders need to be involved in each element of the process – countries distinguish according to different groups of stakeholders.

- Systematic stakeholder involvement – introducing a new criterion? There is a strong emphasis on the involvement of stakeholders, however the EQF referencing criteria hardly refer to the actual role of stakeholders, as to how they should be involved. One idea would be to introduce a new criterion, **supporting criteria 2 and 4, on how stakeholders should be involved in the referencing process**.

- Alternatively, **criterion three could be deepened** to integrate this aspect of stakeholder involvement, emphasising the centrality of the learning outcomes principle. It is important to stress that **learning outcomes are not just a theoretical and abstract construct, but they are about intentions**.

- **Opportunity to define the role of stakeholders as the EQF referencing process enters a new phase.** This new phase in the European process, which will more strongly than before focus on a **review role**, could be taken as an opportunity to define the role of stakeholders more clearly, in particular for the ongoing referencing (or second wave of referencing).

- **Possible resistance towards broadening the base of ownership of the NQF** There might also be some resistance towards the idea of strengthening the role of stakeholders. Those currently in charge might be unwilling to share their influence and power (the aspect of ‘opening up the secret garden of education and training’). In several countries, the (legitimate) view prevails that the education and training system is a matter of those governing the country and not a matter of employers.

Terminology and language matter:

- It is important to make sure that there is a common understanding across countries of the terminology used in the EQF context.

- Terminology matters a lot in the context of EQF implementation, and the way how certain terms are translated or understood in certain languages, adds to this complexity. Some countries carefully distinguish between ‘guidelines’ and ‘guidance’, or alternatively, between ‘method’ and ‘methodology’.

- Some countries (or languages) are more deliberate than others in their choice of certain terms. For some, the terms to ‘level’, ‘assign’, ‘link’, ‘allocate’ can be used interchangeably, for others they bear a clear difference. Some explicitly allocate qualifications to levels; others ascribe a level to a qualification.

- Countries apply different concepts as to what is understood by a non-formal qualification, a partial qualification, etc.
ROUND TABLE 2: HOW CAN GUIDANCE ON CRITERIA 2 AND 4 BE IMPROVED?

Within the second set of round table discussions, participants were again asked to work in small groups. This time they were asked to discuss how guidance on referencing criteria 2 and 4 could be improved. As before, each group was given 30 minutes to discuss this question, and to develop ideas and suggestions. Afterwards, each group presented their outcomes.

Key messages from this session:

- The honest and transparent dealing with problems and weaknesses encountered is a distinguishing characteristic of an EQF referencing report, as it contributes to the development of mutual trust.

- Links between criteria and their interaction: Referencing criteria – in particular criteria 2 and 4 – must be considered in relation to each other. Criterion 4 cannot be sufficiently addressed without providing a sound approach for addressing criterion 2. Accordingly, criteria 2 and 4 should not be discussed without referring to criterion 3 (quality assurance).

- There is support for some form of (non-prescriptive) guidelines/checklist to improve guidance on criteria 2 and 4. Also there is support for some form of guidelines or exchange on the practice of levelling in particular.

- NQFs should primarily be designed to serve national needs (society, labour market). The link to the EQF is important too but should not overrule national needs.

- There might be a risk that countries aim too much to satisfy the expectations of the EQF Advisory Group (‘We do not think nearly as much about how to explain it to our country as we think about how to explain it to the EQF Advisory Group.’).

Criterion 2:

- Understanding of the vertical dimension: To understand how countries distinguish between different levels – the conception of levels - is very important and a key aspect in understanding the qualifications framework of a country.

- Implicit hierarchy of levels: To which extent did countries already have an implicit vertical hierarchy when NQF developments started? To which extent would the vertical framework then be institution-based, not outcome based? If this is the case, will the conception of levels change as we continue with the process?

- Understanding of descriptors: Guidance on how to read descriptors (vocabulary), and how to use them, is important.

- Suggested important aspects to consider/cover: - linguistic analysis; - explaining the conceptual basis/structure of descriptors; - concrete examples of qualifications and learning outcomes; - summaries of levels.

Criterion 4:

- National levelling processes must be convincing, engaging, democratic and honest.

- The linguistic approach is important, but there is the need to understand the underlying intention. From experience, this cannot be achieved through a linguistic/technical approach alone.

- The quality and use of source material (opinions, interests, values, data, practice and research) is both key issue and challenge.

- Suggested important aspects to consider/cover: - explanation of the approach to levelling (not just the procedures applied); - instructions for reading descriptors (vocabulary used) and show how they are used in levelling; - the relation between qualifications and qualifications levels.
CONCLUSIONS AND RECOMMENDATIONS TO INFORM THE ONGOING REFERENCING

To conclude the peer learning activity, Mike Coles presented a synthesis of the conclusions and recommendations, and reflected on how the outcomes of this PLA could be used to inform the ongoing EQF referencing process.

Mike reminded participants that the EQF is a European initiative, but what really makes it work is the work countries do in their national settings, with their stakeholders and their quality assurance bodies. For the outcomes of this peer learning activity, it is thus particularly important to develop ideas and recommendations which help countries to improve processes in their countries.

Mike also presented a set of nine ‘possible general parts’ for the process of levelling of qualifications to NQF levels, which was developed based on the discussions of Workshop group 2.

Possible general parts of a process of levelling of qualifications to a NQF level:

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<tbody>
<tr>
<td>1.</td>
<td>Conceptual clarification (e.g. qualifications, frameworks, learning outcomes, competence, NQF level, levelling)</td>
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<td>2.</td>
<td>Documentation to support levelling, training</td>
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<td>3a.</td>
<td>Using learning outcomes - technical matching (semantics, analysis of learning outcomes of qualifications, assessment criteria, counter checking)</td>
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<tr>
<td>3b.</td>
<td>Using learning outcomes - social matching (traditions, perceptions of hierarchy, relative standing of qualifications types)</td>
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<td>4</td>
<td>Levels in practice (e.g. what HR consultants say, pay, job advertisements)</td>
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<td>5</td>
<td>Quality assurance processes – comparability information, social partner engagement</td>
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<td>6</td>
<td>Policy endorsement or policy decision</td>
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<td>7</td>
<td>A period of adjustment/better fit of qualifications to levels</td>
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<td>8</td>
<td>Making outcomes public</td>
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<td>9</td>
<td>A review of the levelling process used.</td>
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Suggestion developed by Mike Coles, based on discussions in Workshop 2.

Key aspects from this session:

‘The point of departure is right now.’

- The referencing process has significantly improved in past few years. Even though there are some counties left to present their referencing report, a point of departure has been reached, leading into a new stage of referencing.

Implicit structure of frameworks

- To which extent are NQFs based on the hierarchical frameworks of qualifications which reflect a country’s history? Is there a need to further examine the vertical dimension?

This choice of words was very deliberate. Some participants opposed the use of the terms ‘method’ or ‘methodology’ in this context, as they could appear too prescriptive. It was thus emphasised that this list has no status; it is meant to serve as useful information to countries for their work on the levelling of qualifications.
Reference to stakeholders in the ten criteria – separate criterion?

- The referencing criteria already refer to the involvement of stakeholders. Is there however a need to define a separate criterion which more specifically deals with the way in which stakeholders are engaged?
- In some countries, the involvement of stakeholders is a natural process, while in others they do not have real power and their involvement is purely symbolic.

Future of criteria 2 and 4:

- What would be the value added of combining criteria 2 and 4? Combining these two criteria might add to greater clarity. Or should they be kept separate, as they might move at different speeds?
- There is a veritable chance that countries get better at criterion 4. In most countries, referencing seems to have been based on the formal system, leading to a certain (political) bias. It is hoped that with an increasing number of non-formal qualification included in the NQFs, there will be less political bias, and an increased interest by stakeholders in transparency.
- Is there a need for new guidelines on criteria 2 and 4 (for the second wave of referencing)?
- Is there a need for a new Note on referencing?
- Should the referencing criteria be reviewed altogether?
- How to make the principle of best-fit work better? The qualifications in a country are subject to change over time; this might allow qualifications to better fit the NQF in the future.

Criterion 3 and its links to criteria 2 and 4

- Could criterion 3 be improved to make the use of learning outcomes more explicit? Could the use of learning outcomes be encouraged through a revised criterion 3?
- Any discussion of criteria 2 and 4 should also include criterion 3. Countries have come a long way with the use of learning outcomes, and they seem to have opened up the qualifications framework in many countries to a wider range of stakeholders. It has been made better possible for stakeholders to become involved.

Future of referencing: the impact of NQFs

- With the second wave of referencing, Europe reaches are stage where more and more NQFs are established. Countries use their NQFs for different purposes. This might lead to increased interest in a more in-depth review of the implementation of NQFs, i.e. their impact. The idea of a peer review of the implementation of NQFs was mentioned.
ANNEX A – AGENDA

Scan_NQFs on the go.pdf
Criteria and procedures for referencing national qualifications levels to the EQF

1. 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.

2. There is a clear and demonstrable link between the qualifications levels in the national qualifications framework or system and the level descriptors of the European Qualifications Framework.

3. The national qualifications framework or 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.

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

5. 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 (as indicated in annex 3 of the Recommendation).

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

7. The referencing process shall involve international experts.

8. The competent national body or bodies shall certify the referencing of the national qualifications 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.

9. 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.

10. 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 European Qualifications Framework level.

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5 http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetailDoc&id=10973&no=2