InFocus Programme on	Skills, k	Knowledge an	d Employa	ability
			. —	

National qualifications frameworks: Their feasibility for effective implementation in developing countries

Michael Young, Professor of Education, Institute of Education, University of London

Copyright © International Labour Organization 2005

Publications of the International Labour Office enjoy copyright under Protocol 2 of the Universal Copyright Convention. Nevertheless, short excerpts from them may be reproduced without authorization, on condition that the source is indicated. For rights of reproduction or translation, application should be made to the Publications Bureau (Rights and Permissions), International Labour Office, CH-1211 Geneva 22, Switzerland. The International Labour Office welcomes such applications.

Libraries, institutions and other users registered in the United Kingdom with the Copyright Licensing Agency, 90 Tottenham Court Road, London W1T 4LP [Fax: (+44) (0)20 7631 5500; email: cla@cla.co.uk], in the United States with the Copyright Clearance Center, 222 Rosewood Drive, Danvers, MA 01923 [Fax: (+1) (978) 750 4470; email: info@copyright.com] or in other countries with associated Reproduction Rights Organizations, may make photocopies in accordance with the licences issued to them for this purpose.

ISBN: 92-2-117275-9

First published 2005

The designations employed in ILO publications, which are in conformity with United Nations practice, and the presentation of material therein do not imply the expression of any opinion whatsoever on the part of the International Labour Office concerning the legal status of any country, area or territory or of its authorities, or concerning the delimitation of its frontiers.

The responsibility for opinions expressed in signed articles, studies and other contributions rests solely with their authors, and publication does not constitute an endorsement by the International Labour Office of the opinions expressed in them.

Reference to names of firms and commercial products and processes does not imply their endorsement by the International Labour Office, and any failure to mention a particular firm, commercial product or process is not a sign of disapproval.

ILO publications can be obtained through major booksellers or ILO local offices in many countries, or direct from ILO Publications, International Labour Office, CH-1211 Geneva 22, Switzerland. Catalogues or lists of new publications are available free of charge from the above address, or by email: pubvente@ilo.org Visit our web site: www.ilo.org/publns

Foreword

The development of national qualifications frameworks (NQFs) is a major theme in international debates on education and training policies and strategies. The ILO's new Recommendation No. 195 on human resources development: education, training and lifelong learning, adopted in June 2004, recommended the adoption of an NQF as a means of promoting the development, implementation and financing of a transparent mechanism for the assessment, certification and recognition of skills.

We have witnessed growing international interest in NQFs, in particular since the mid-1990s. While the degree and specific form of such frameworks vary, the NQFs adopted by Australia, New Zealand, South Africa and the United Kingdom have been influential in informing other interested countries in developing their own frameworks. However, despite the heightened interest, the full implication of developing such a framework for a country, including technical, institutional and financial preconditions, capacity and commitment, are not always well understood. The development and implementation of an NQF is a demanding task and requires long-term commitment and investment, in particular for countries with limited technical and financial capacity. In many cases, adopting an NQF would mean that these countries would need to make a major strategic decision on the use of their scarce training resources.

While the potential benefits of an NQF are asserted in other studies, few studies focus and examine the potential problems. The present report takes on this task and provides a critical analysis of the process of developing an NQF. It stresses the importance of being aware of the potential problems, as well as potential benefits. It is hoped that the findings of this report will assist interested policy-makers, and those countries which are in the midst of developing frameworks, to make balanced and informed decisions on how to approach NQF development.

Finally, I would like to express my sincere thanks to Professor Michael Young, Institute of Education, University of London, for undertaking this challenging task and providing a stimulating report.

Jane Stewart,
Director,
Skills and Employability Department.

Contents

Foreword	iii
Acknowledgements	vii
Introduction and overview.	1
Section 1 – The political and economic context.	5
Section 2 – What is a national qualifications framework?	8
Section 3 – Types of national qualifications frameworks	12
Section 4 – Assumptions underpinning national qualifications frameworks	15
Section 5 – Problems with implementing NQFs	17
Section 6 – Approaches to implementation: Lessons from "success stories"	19
Section 7 – Further issues	24
Section 8 – Alternatives	30
Section 9 – NQFs and developing countries	32
Section 10 – Conclusions and future possibilities	33
Bibliography and further reading	37

Acknowledgements

I am grateful for the perceptive comments, queries and criticisms of the first draft of this report that I received from Akiko Sakamoto and her colleagues in the International Labour Office. I am also grateful to Dr. Judith Harris for her comments on an earlier draft.

Introduction and overview

A growing number of countries, at very different stages of economic development and with very different cultural and political histories, either have introduced, or are in the process of introducing, some form of national qualifications framework (NQF). The policy documents that describe these developments point to considerable agreement on both the form that these national frameworks are taking and the policy goals that it is hoped they will achieve. There is also evidence of considerable "borrowing" of structures and design principles that were originally formulated in industrial countries such as England, Scotland and New Zealand, where the early NQF developments were introduced in the 1980s.

The growing international support for establishing NQFs reflects both the mediating role and support of international agencies such as the OECD, the World Bank and the ILO, and the funding priorities of donors and the growing interest on the part of regional organizations such as the EU in promoting links, interchangeability and portability between national systems of qualifications.

On the other hand the broadening support for NQFs across the world is based on relatively little evidence from the experience of countries that have already introduced NQFs that they can achieve the goals claimed from them. Furthermore, the new proposals appear to take little account of the considerable difficulties faced by countries that have already attempted to implement NQFs. This suggests that NQFs may be being introduced less for their proven educational benefits and more for broader political reasons. Examples of such reasons are: (a) the scope they are seen to offer governments for making their national systems more accountable – England is a good example (Young, 2002; Raggatt and Williams, 1999); (b) the importance for the governments of countries in transition of demonstrating that they have made a "break with the past; ¹ and (c) the hope that what appears to be a reform that is relatively straightforward (in the sense that establishing an NQF does not in itself require major institutional changes), and does not challenge local interests, might have economic and political benefits. The reality of implementation, in relation to each of these reasons, as this report will show, is rather different. ²

In commenting on the feasibility of introducing NQFs in developing countries, this report discusses the extent to which the form that NQFs take has varied between countries. It also considers the implications of the fact that there are significant and economically successful countries in Europe, Asia and North America where there are no moves to introduce an NQF. Both these types of international variation provide the basis for exploring alternatives – the former in terms of different types of NQF, and the latter in suggesting different ways of organising qualifications as part of a national education and training system.

The primary concerns of this report are the feasibility of introducing an NQF and the problems that may arise in the process of implementation. It may appear that the report places greater emphasis on the problems rather than on the benefits of NQFs. In relation to this point a number of observations are worth making. First, the report endorses the widely accepted public goals of NQFs that are associated with promoting social justice, improving

¹ Post-apartheid South Africa is an obvious example but the point may also apply to countries in Eastern Europe.

² In the UK, for example, a national framework for vocational qualifications was established in the late 1980s and nearly a thousand qualifications were registered. However, this did not mean that the majority of these qualifications were ever used.

access to education and training and raising standards. Secondly, the introduction of NQFs has faced real difficulties, in all countries, that cannot be wished away or put down simply to prejudice, vested interests or unthinking opposition to change. It is no help to countries that are considering whether to introduce what will undoubtedly be a far-reaching reform, if they are not made aware of the difficulties other countries have experienced. Thirdly, the potential benefits of NQFs are already widely publicized in many government and other proposals. In an earlier paper (Young, 2002), I have adopted the distinction between *intrinsic* and *institutional* logics ³ to discuss the tension between the benefits of an NQF and the implementation problems that such an innovation has to face. It is my contention that up to now, governments considering the introduction of an NQF have neglected the institutional context within which the implementation of NQFs is designed to take place.

In order to tackle the question of feasibility, a broad perspective is needed on the kind of intervention that a NQF is likely to involve. Such a perspective needs to include the role of the State and the type of State in a particular country, ⁴ the form and strength of sectoral employer organizations and the extent to which it is qualifications (or outcomes) rather than institutions that are given priority in driving educational reform. Furthermore, the spread of NQFs cannot be seen separately from the increasingly central role that many national governments are giving to qualifications themselves as measures of educational productivity.

This report is divided into ten sections. *Section 1* considers NQFs as an example of a political intervention. It therefore locates their origins in the increasingly global political and economic context as it has developed since the 1980s. ⁵ This perspective is important for a number of reasons. Firstly, the political and economic circumstances facing all countries (and especially developing countries) are now very different from the 1980s when the first NQFs were established. Secondly, the developing countries which are now introducing NQFs face a very different set of circumstances to those faced by England, Scotland and New Zealand when the first proposals for NQFs were launched. Thirdly, a major factor that accounts for differences in national approaches is what is sometimes referred to as path dependence (Unwin et al., 2004). Briefly, the idea of path dependence stresses the extent to which the policies of any country are inevitably shaped by their history. ⁶

Section 2 poses the question "What is a National Qualifications Framework?" ⁷ It considers how NQFs differ from how qualifications have traditionally been organized and

³ This distinction was originally suggested by David Raffe (Raffe, 1992) of the University of Edinburgh in an analysis of the introduction of modular vocational programmes in Scotland.

⁴ A useful distinction can be made between countries which place an emphasis on the regulatory role of the State (for example, the UK) and those countries such as Japan, the Republic of Korea and Singapore which see the State having a more developmental and interventionist role.

⁵ The evidence and experience that I draw on comes largely, but not entirely, from the UK which is a far from typical case. Even in Europe – some have called it "a laboratory for neo-liberalism". The chapter that I wrote on international UK perspective provides a useful contrast.

⁶ For example, UK educational policies have been shaped by a voluntarism in relation to state intervention that can be traced back to the nineteenth century and is very different from the tradition established in continental European countries.

⁷ This report is primarily concerned with NQFs for vocational qualifications, although the term is increasingly used for frameworks that are designed to include general (or academic) qualifications as well (see Section 3).

develops a model of the key elements of a National Framework which provides a benchmark for making international comparisons.

Section 3 draws on the comparative literature on NQFs to emphasize how NQFs have taken on different characteristics in the different countries which have introduced them; it stresses how important it is to recognize that, despite strong cross national similarities, there is no one model for an NQF which any country wanting to introduce a national framework must adopt. This section explores the main axes of differentiation on which NQFs vary.

Section 4 builds on Section 2 and examines the main assumptions on which NQFs are based. The discussion is organized around the idea that NQFs are based on a tension between two sets of principles. These tensions are between:

the principles of similarity and difference;

and

the principles of giving priority to outcomes and inputs.

The section examines some of the possible implications of the different ways that these two tensions impact on the implementation of an NQF and how they might be resolved.

Section 5 considers some of the problems that have been faced by countries introducing an NQF and how they might be overcome. It discusses the extent to which these problems reflect, on the one hand, the particular stage of implementation that a country has reached or a lack of resources or inadequate support from central government, and on the other hand problems that are inherent in the concept of an NQF and what it seeks to achieve.

Section 6 is concerned with the issue of implementation and draws on lessons from what the report identifies as "NQF success stories". It extracts from three of these success stories the factors that appear to be involved in successful implementation and considers their wider implications, especially for developing countries. Finally, it considers the broader lessons that can be learned about the requirements for effective implementation.

Section 7 explores a number of further issues that have arisen and been debated in the process of implementing NQFs and which, if not taken account of, are likely to present barriers to any future implementation. The section considers the issues of: (a) qualification levels; (b) lifelong learning and employability; (c) the role of stakeholders; (d) the use of standards in the design of learning programmes; (e) assessment issues; (f) the question of integration (or unification as it is sometimes referred to) of vocational and academic learning; (g) the accreditation of prior experiential (or informal) learning; (h) the role of professional associations; (i) the professional development of teachers and trainers; and (j) costs.

Section 8 is concerned with alternatives to an NQF as a way of organizing qualifications and promoting the reform of vocational education. First it draws on Section 3 to consider the possibility of introducing more limited or "partial" types of framework that would make fewer demands on resources and confront fewer barriers, and be able to be implemented over a shorter period of time. Secondly, it refers briefly to those countries that have successful systems of education and training that are not based on NQFs. It draws on a distinction developed in work undertaken for the OECD (see Young, 2002) between outcome-based and institution-based approaches to qualifications and

explores their strengths and weaknesses as approaches to the reform of qualifications, and more generally of systems of education and training.

Section 9 draws on the previous sections to consider some of the specific problems that may be faced by developing countries, and suggests some principles on which implementation strategies might be based.

Section 10 reviews the potential benefits and problems that are likely to arise from introducing an NQF and speculates on future possibilities. It concludes with a discussion of possible options that take account of the issues raised in the report.

Section 1 – The political and economic context

The idea of an NQF has its intellectual roots in the competence approach to vocational education which was broadened by Jessup (1991), and others in England, who developed the idea that all qualifications could (and should) be expressed in terms of outcomes without prescribing any specific learning pathway or programme. However, neither the idea of competence nor that of an NQF were developed primarily to solve the problems of the qualification system. Both are best understood, at least in the cases of the UK and New Zealand, in the context of the emerging neo-liberal economic policies of the 1980s and early 1990s which emphasized the primary role of the private sector in economic development. 1 It was assumed that employers themselves would be in the best position to identify training needs, and therefore to say what kind of vocational qualifications were needed. This emphasis on employer needs was seen as best expressed by allowing them to define qualifications in terms of workplace performance outcomes.² At the same time trade unions were largely excluded, being associated by the government of the time with a time-serving approach to work-based learning - the old craft apprenticeships – and other forms of restrictive practice. Likewise, giving priority to employer definitions of outcomes limited the role of education and training providers (especially colleges) which were seen as offering what their staff could teach rather than what employers in the different industrial sectors needed.

Another important aspect of the political context in which the first framework for vocational qualifications (national vocational qualifications or NVQs) was developed was the need to certify those on youth training schemes for unqualified school leavers, who in a previous period would have gained unskilled manual jobs. It is not surprising that NVQs became associated with low-level qualifications with limited currency on the labour market.

NVQs were based on standards set by employer-led industry lead bodies. However, as Raggatt and Williams (1999) point out, few UK employers were interested in either enabling their employees to gain vocational qualifications, or using these qualifications for recruitment. As a result the lead bodies were far from representative and the NVQ framework became employment-led rather than employer-led, and over-dependent on consultants employed by the lead bodies to develop the occupational standards. The trade unions, though broadly more supportive of NVQs than employers, played only a marginal role in the UK context for reasons already mentioned; the anti-union political climate of the time and the high levels of unemployment gave them very little leverage on policy.

The major political function of the NVQ framework in the UK was, therefore, that it provided a mechanism for transferring the control of vocational education from providers to employers. This was something to which an outcomes-based approach appeared

¹ In the case of the UK, it is important to distinguish between the nationwide NVQ framework and the outcomes-based national Certificate Framework developed slightly earlier in Scotland (Raffe, 2003). The Scottish innovation in the early 1980s is important not only because it was a precursor to the Scottish Credit and Qualifications Framework developed in the late 1990s, but because it demonstrates that an outcomes-based framework does not preclude the close involvement of providers. The Scottish National Certificate was introduced to rationalize college-based qualifications, not work-based qualifications. It was designed with college providers in mind and became the basis for the more integrated approach to academic as well as vocational qualifications that was developed later. The publication "Guide to Writing Units" (SCOTVEC, 1994) provides an interesting example of how outcomes can be written with providers and not just assessors in mind.

² Or National Occupational Standards, as they became known.

peculiarly suited. However, with unenthusiastic employers and governments that were reluctant to legislate, the idea of an overarching NVQ framework made little progress; most of the NVQs achieved were qualifications at levels 1 and 2 that were specifically funded by the government's Youth Training Scheme.

In the mid-1990s the idea of a national framework resurfaced and was linked to the government's new interest in lifelong learning. An NQF appeared to offer the possibility of promoting lifelong learning by accrediting all types of learning wherever it took place and whatever the age of the learner. At the same time it appeared to fit in well with the idea that improving qualifications should be the responsibility of individuals not of the government. This link between the idea of an NQF and the promotion of lifelong learning was by no means a specifically UK development; national initiatives were paralleled by a series of influential European Union White Papers.

What might be seen as a third phase of government interest in NQFs dates from about the year 2000 and has taken a number of forms. In the UK an NQF has been seen as a way of encouraging learning among low achievers when they reach 16 and end their schooling. In principle an NQF can link adolescent learning to adult education, both of which have been given a more vocational role with the aim of improving people's employability. This third phase has been associated with the development of credit-based frameworks which, again at least in theory, allow learners to accumulate credits obtained at different times and in different contexts as a way of achieving a full qualification. While there is some evidence that a credit-based approach stimulates motivation to gain qualifications among adult learners, it is far less clear that credit-based qualifications provide a basis for progression, except in the special case when the credit framework is geared specifically to progress into higher education. This point will be returned to in Section 7.

In some developing countries, ³ NQFs have taken on a rather different and more overtly political purpose as part of a strategy for achieving redress and overcoming the inequalities of the past.

Access to formal education in South Africa has been, and still is, characterized by sharp racial inequalities. This is a legacy of South Africa's apartheid past when many adult Africans were denied access to higher levels of schooling or to other opportunities for gaining qualifications. An NQF, by providing an accreditation basis for treating informal learning as equivalent to institutional learning or formal education, is seen by some as a way of overcoming these inequalities. There are however, several problems with attempts to extend equality of opportunity through the use of outcomes-based frameworks. The first is that frameworks are essentially supply-side approaches to the problem of lack of skills and knowledge. Despite the rhetoric that NQF-based vocational qualifications are employer-led, changes in qualifications on their own can do very little to increase the demand for skills and knowledge, let alone employment. It is sometimes argued that although an NQF can do little to increase the demand for qualifications, it can at least reduce confusion and be the basis for a clearer system. The problem with this argument is not that clarity is unimportant but that it only takes on a real significance in the context of new demands for knowledge and skills. Clarity is never a goal in itself.

Most countries have relatively clear progression routes from upper secondary school to university, at least for a small section of each cohort – that is why progression from

³ South Africa is an interesting example and shows signs of becoming a model for other countries in the SADC region. With its combination of leading edge industries such as motor vehicle manufacture, rural under-development and acute inequalities, South Africa has significant parallels with Brazil rather than other developing countries.

upper secondary education to university is often known as "la route royale". For the large numbers who do not have access to such routes, the issue is how to improve their capabilities of "getting on the ladder", rather than having clearer routes that they might follow. Another problem is that using an outcomes-based framework to claim that there can be formal equivalence between informal or experiential learning and institutional learning can appear to undervalue the latter, and deny the importance of the kind of knowledge that can only be acquired through institutional learning.

Section 2 – What is a national qualifications framework?

The organization of qualifications is one of the most basic features of any system of education and training. However, until recently it has been little debated or researched. It may be that it is for this reason that those proposing the introduction of NQFs rarely recognize the radical implications of the changes that are involved. Introducing an NQF based on levels, standards and outcomes is not a superficial reform that leaves most existing education and training provision able to go on as before. If taken seriously it involves a complete change, not only in the way qualifications have traditionally been organized (and in many countries still are), but also in the deeply embedded practices that underpin them. It implies a shift from placing specialist educational institutions at the centre of the system of education and training to a system in which the learner and his/her opportunities to gain a qualification is at the centre. Whether the concept of the individual learner can bear such a responsibility when real learners differ so much in their capabilities is something that needs serious debate.

Using a political analogy, it is a revolutionary not an evolutionary change. 1 It is useful to refer to this change as a shift from qualification systems, which in most countries have developed in a relatively ad hoc way in response to specific needs such as selection for university, license to practice or entry into occupations, 2 to qualification frameworks. Unlike the systems they are designed to replace, NQFs do not derive from specific needs (for example those related to particular occupations), but from a national decision to establish a common framework that is as comprehensive as possible and covers as wide a range of sectors and as large a proportion of the population as possible. NQFs are top down initiatives led by governments or government agencies, and based on a set of general principles about how qualifications should be designed and what they should achieve. Less recognized, but no less important, is that NQFs are also based on assumptions about the changing structure of occupations and their various modes of recruitment and promotion. It follows, not surprisingly, that implementing an NQF is likely to face considerable resistance from vested interests. These interests may be an expression of power relations (such as the different roles of employers, trade unions and different sectors of the teaching profession), or it maybe that an NOF challenges the day-to-day practices of assessors, teachers or managers. Likewise, such interests may be defending out-of-date and unfair practices, or they may be defending educational values that are important in any system. What then are the differences that NQFs embody and why can they appear to pose such threats?

The principles of a qualifications framework such as portability and transparency of qualifications lead to criteria with which all providers of qualifications are expected to comply. An NQF establishes commonality across different qualifications and specifies qualifications in terms of standards, levels and outcomes. As an approach to qualification design, these features of an NQF stand in stark contrast to traditional qualification systems, where most qualifications are tied to very specific forms of provision (or input), such as a period of school or college attendance, or the time served as an apprentice. Likewise

¹ Readers might like to compare my argument, that introducing an NQF is a revolutionary step, with Vargas' account (Vargas 2005) of NQFs in Latin America which he sees as an evolutionary development from earlier competence models.

² This trajectory is likely to take a somewhat modified form in developing countries which may not have had more than the rudiments of a qualification system of the traditional type found in industrial countries.

qualifications in traditional systems vary widely in the forms of assessment they require. Some demand an examination or test, whereas others may depend on time served, or on the judgement of a master or employer. No attempt is made or expected that would claim these were equivalent. An NQF on the other hand embodies a principle of similarity which either involves a common approach to assessment across all qualifications or a set of criteria with which any specific assessment scheme has to comply. A third difference is that in previous systems vocational qualifications did not exist in some occupational sectors or fields of study, or did not exist at all levels; qualifications were only developed where a specific need arose and such needs usually related to selection for employment or a guarantee of quality of work. As a result in most countries, qualifications are unevenly represented across sectors and between levels. A good example is the frequent absence of qualifications in the service sectors. In contrast, an NQF is a form of grid covering all levels in all sectors or fields. Developing an NQF implies that there can be qualifications at any level and in all sectors, regardless of whether there is a specific need for them. This grid approach creates problems which will be returned to later in this report.

The main features that distinguish an NQF from previous qualifications systems can be summarized as follows:

- Qualifications are described in terms of a *single* set of criteria or a single definition of what is to count as a qualification.
- Qualifications are ranked on a single hierarchy expressed as a single set of levels each with its distinct level descriptors.
- Qualifications are classified (in the case of vocational qualifications) in terms of a comprehensive set of occupational fields.
- Qualifications are described in terms of *learning outcomes* that are independent of the site, the form of provision and the type of pedagogy and curriculum through which they may be achieved.
- A national framework of qualifications provides a set of benchmarks against which any learning can be assessed in terms of its potential contribution to a qualification.
- All qualifications are defined in terms of elements (sometimes referred to as units or unit standards), and ascribed a volume in terms of notional learning hours expressed as quantifiable credit. A learner has to achieve a given number of credits to gain a qualification.

It is these features that, in principle, allow qualifications to be the basis of the goals claimed for them. For example, in principle, qualifications as part of an NQF are designed:

- to be achieved by accumulation over time (credit accumulation and transfer);
- to be transportable units of one qualification can be used for other qualifications;
- to be transparent learners know precisely what learning outcomes they are required to demonstrate to achieve a qualification; and
- not to require any specific prior learning programme.

None of these possibilities were available within traditional qualification systems. Whether these possibilities are realistic and to what extent they are more important than what is achievable through the bounded scope of traditional qualifications are questions that this report discusses in later sections.

It is not being suggested that all NQFs express all these features; the list however, represents a model which can be used to compare different national frameworks. The contrast with traditional qualification systems is highlighted when the list is compared with features of traditional systems which rely largely on a combination of syllabuses, past examination papers, attendance at college and in some cases a requirement for time served on work experience.

The introduction of an NQF involves two processes; the balance between them will depend on the level of provision in a country and the existing system that is being replaced. The first process is the redesign of existing qualifications to fit the criteria of the framework, and the second is the development of new qualifications based on the framework criteria in occupational sectors and at levels where they may not have previously existed. A successful example from the UK of the latter is the social care sector where most employees have traditionally been low paid and without qualifications. It is widely recognized that enabling unqualified employees in the social care sector to gain qualifications based on their existing skills and experience has enhanced their self-esteem and in some cases motivated them to engage in further study leading to new opportunities for promotion. Another type of example is new occupations such as customer service in the UK and, in a country like South Africa, the fast expanding Tourism and Heritage sectors which have no previous tradition of qualifications. However, in these cases there are likely to be problems in establishing knowledge and skill requirements.

The extent to which an outcomes-based framework leads to a complete replacement of the old system depends on how prescriptive the criteria of the new framework are, and whether the framework criteria are made a legal requirement by government. ⁴ The case of the NVQ framework in the UK is arguably an example of "the worst of both worlds" – a highly prescriptive framework in terms of how qualifications and assessment requirements are defined and a government unwilling to legislate. The original assumption of the national vocational qualifications review (RVQ) that led to the new framework was that it would be an instrument for accrediting existing qualifications. However, in practice this proved to be impossible ⁵ and either existing qualifications continued to be provided independently of the framework, or completely new qualifications were developed that complied with the framework criteria.

The key distinctions between an NQF and previous qualification systems are that an NQF is designed independently of any education and training provision, and it is based on a single set of levels standards and outcomes. It is these features of an NQF that have posed particular problems for those involved in implementation. An outcomes-based framework is fundamentally an assessment framework, not a framework for provision. However, only relatively few learners have the prior skills and knowledge to make use of such an assessment framework, and many (especially in developing countries) will lack skills and knowledge of any kind beyond that needed for survival. Most adults, as well as young people, need provision as well as assessment. This leads to the question of how an outcomes-based framework can be related to institutional provision – in other words to the

³ However, in seeking to generalize from this example it is important to note that social care in the UK is a public, or publicly funded, sector over which the government has considerable leverage in requiring employers to offer their employees opportunities to gain qualifications.

⁴ For example sectors that rely largely on small, and what are sometimes known as micro, businesses like beauty care and hairdressing, find it extremely difficult to comply with a common framework that lists requirements for opportunities for trainees to develop numeracy and literacy skills.

⁵ The new criteria were too prescriptive and too different from the old qualifications.

curriculum, teaching and learning. The NQF developments which have had fewest implementation problems (as in the case of the Scottish National Certificate (SCOTVEC, 1994) and some national sectors), have modified the criteria listed above and have taken into account the requirements of teaching programmes in the specification of their outcomes, criteria and assessment requirements.

Constructing a framework based on levels, outcomes and standards that (in the case of vocational qualifications) describe learning at all levels from basic manual operations to professional judgement and across sectors as different as plumbing and business administration, requires a completely new "generic" language with which to describe learning. A wide range of very specific and specialist types of learning have to be describable in the same terms. It is this requirement of an NQF that leads to the widely experienced problems of jargon and obscure terminology, and the lack of connection between definitions of learning outcomes laid down in NQF documents and the specific skills and knowledge needed in particular workplaces. ⁶

⁶ An interesting example of an attempt to develop a more context-specific approach to standards was the Education, Training and Development Practitioners (ETDP) Project in South Africa (NTB, 1997). The Project put the case for both generic and context-specific standards; however it was only the former that found favour within the Qualification Authority (SAQA).

Section 3 – Types of national qualifications frameworks

Although all emerging frameworks have common features that reflect their common origins in competence-based models of vocational education and training, and the fact that they have all borrowed from each other and from frameworks established earlier, specific national frameworks vary considerably. However, these variations are as important as the similarities because they offer different models that developing countries can draw on. These variations are usefully expressed in terms of a number of distinctions.

(i) Frameworks of communication (sometimes described as "enabling frameworks") and regulatory frameworks

This distinction refers to the different goals or purposes that an NQF is designed to achieve rather than its strength (or its capacity to achieve these goals). All NQFs have a "communication" role, in the sense that they provide a map of qualifications; they give some indication of progression routes between levels and, at least in principle, across sectors. The "communication" potential of an NQF means that at a minimum it can assist both learners and those involved in career and training guidance in making choices. For this reason frameworks with this more limited role can be described as "enabling frameworks" to distinguish them from frameworks with a more overt regulatory role. Because enabling frameworks rely on agreement and their level of prescription is low, they are far less problematic to introduce. On the other hand with very limited prescription, the potential use of a framework is also limited; its success in achieving its goals depends entirely on voluntary cooperation. No sanctions are imposed on the providers of qualifications who do not comply with common design criteria. As a result, with a limit to its communication role, many of the old barriers to progression are likely to continue. Likewise, qualifications outside the framework can still continue to be used. The Australian framework (the AQF), the Scottish framework (the SCQF) and the French framework represent different versions of an enabling framework. The AOF allows all qualifications to be placed on the framework at an appropriate level, but does not provide any prescriptive definition of a qualification, or require qualifications to take a particular form (Keating, 2003). The SCQF defines qualifications in terms of levels, units and credits, but individual providers are allowed to continue to operate with institution-specific ways of organising qualifications. The levels and credit are available rather than prescribed. In France, the framework acts as a map; however, provision of qualifications is regulated in other ways (Bouder, 2003). The question of balance between prescription and consensus is not which is better, but of purpose and political capacity and therefore what is possible. Over-prescription that has no basis in how qualifications are actually used is unlikely to be effective. On the other hand, framework criteria can give a lead to negotiations between designers and users of qualifications which can assist them in achieving greater portability.

¹ Two senses of the term "prescription" need to be distinguished. One refers to the degree of specification required for a qualification to be registered on the framework. Typical examples are: (i) whether a qualification is required to be available via the accreditation of prior learning; and (ii) whether a qualification has to be expressed in a specific number of units to which credit is assigned. The second meaning of prescription refers to the role of the State and whether the registration of qualifications is a legal requirement.

(ii) Weak and strong frameworks

This distinction refers to the "strength" or the capacity of a framework to achieve the goals set out by government. It is best understood in terms of the features of a framework referred to in Section 2. It refers both to the number of criteria that are listed in defining a framework and the degree of prescription that is used. It allows us to distinguish between *strong frameworks* like the NVQ framework in the UK, ² the NZQF New Zealand, as well as the NQF being developed in South Africa. In *strong frameworks* strict requirements are laid down for including a qualification on the framework, whereas in *weak frameworks* the requirements are less demanding. ³ Again the Australian framework (the AQF) is an example of a weak (or loose) framework.

Governments tend to want to move towards strong frameworks as they provide greater potential leverage both in relation to coordination and accountability. However, the stronger the framework, the less likely it will be to achieve agreement, and for the framework to be able to include a wide diversity of learning needs.

(iii) Partial and comprehensive frameworks

This distinction refers to the scope of an NQF and is a recognition that only in some countries does the NQF include *all* qualifications that are available. Scope may refer to:

- qualification type e.g. academic or vocational or those that are publicly or privately owned. Examples of the latter are CISCO and Microsoft qualifications which play an important role for people seeking employment in these companies or in companies using their software, but are rarely included in NQFs;
- qualification level many NQFs exclude university qualifications, and there are countries like England which have specific frameworks limited to higher education qualifications;
- qualification sector a framework could be specific to one occupational sector (for example, engineering), as in many cases in Latin American countries (Vargas, 2005). It could also be developed by a subnational region, especially in a country with a federal government, an example is the proposed VQF (Victorian Qualification Framework) in Australia. ⁴ There are also cross-national and regional frameworks

² However, as was mentioned earlier, while the NVQ framework was strong in terms of its requirements, government did not make it a *legal* requirement for all those using or providing qualifications.

³ The term weak is not used in an evaluative sense and for this reason some people have found the distinction between tight and loose frameworks more useful. It is important to stress that my typology of frameworks is itself open to debate and discussion. The only question is whether it is useful in clarifying issues.

⁴ Although it has a small population, Australia is an interesting example for geographically large federal developing countries. The individual states in Australia are largely self-governing in the fields of education and training below higher education. The Commonwealth government (as the national government is known) has developed an AQF (Australian Qualifications Framework) that, up to now, has remained relatively weak (and, some would argue, ineffective, Keating, 2003). At the same time at least one state (Victoria) is developing its own "partial" framework and is exploring ways of linking it to the AQF (VQA, 2003:2004). The interesting possibility is that as

emerging in the Caribbean, Southern African (SADEC) countries, Oceania and the EU's five-level framework.

(iv) Unit-based and qualification-based frameworks

NQFs vary in terms of how qualifications are registered on the framework. The starting assumption, shared by most initial proposals for NQFs, is that qualifications should be unit-based; in other words the learning outcomes assumed to be necessary for a particular qualification are divided up into their basic elements or units. This process of unitization draws on a familiar analytical type of methodology and derives from the functional analysis that was common to much occupational psychology in the United States (Callaghan, 1961). Step 1 involves breaking down the skill and knowledge demands associated with a qualification into its smallest parts (units). Each unit is then assigned to a level and given a credit rating in terms of the notional hours needed to acquire the necessary skills and knowledge. Step 2 involves specifying the minimum constraints ⁵ on the ways in which the units can be combined together, as well as the number of units needed to gain a qualification. Step 3 then assumes that the user (employer and/or employee/trainee) chooses his or her set of units and accumulates enough credit to gain a qualification.

The idea is that this approach to qualification design maximizes flexibility and choice for learners and employers to put together units in ways that suit their interests. In practice the unitization model has created as many problems as it solves. Employers and employees (or students) invariably have different interests and the latter frequently lack the knowledge to make reliable choices. As a result the NQFs in both New Zealand and South Africa have moved away from registering units and the NQF is increasingly based on whole qualifications with only limited opportunities for learners to choose individual units. However, despite the trend to whole qualifications-based frameworks, the idea of unitization remains extremely attractive to policy-makers as the recent proposals by the QCA (2004) in England indicate. I will return to the issues raised by unitization in Section 7 of this report.

(v) Institution-led and outcomes-led sequencing of qualifications frameworks

This distinction refers to the process of implementation rather than to different framework structures. It is exemplified by the contrast between the sub-Saharan countries which are establishing NQFs on the lines adopted by South Africa, and the approach recently adopted by Singapore. Singapore has a high level of institutional provision for both general and vocational education, the NQF is being introduced to further coordinate this provision and to link it to the accreditation of work-based learning. The sub-Saharan countries, on the other hand, are attempting to introduce an NQF with relatively low levels of institutional provision. They presumably hope that an NQF will either act as a substitute for the lack of institutional provision by encouraging the accreditation of informal learning, or that it will act as a catalyst to motivate new provision, especially from the private sector. The danger is that qualifications will proliferate where there is no provision leading to them. An expensive activity without obvious wider benefits.

ways are looked for of bringing federal and state frameworks together, they could modify each other and point to a new type of developmental approach to implementation.

⁵ An example of a constraint is the number of level 3 units that have to be achieved if a learner is to gain a level 3 qualification (around 75 to 80 per cent).

Section 4 – Assumptions underpinning national qualifications frameworks

This section builds on Section 2 and examines the main assumptions on which NQFs are based. It is organized around the idea that NQFs are based on a tension or conflict between two sets of assumptions involved in the design of qualifications. The section discusses these tensions and some of the possible implications of giving priority, as is the case in the design of NQFs, to the equivalence between different types of qualifications and to stressing outcomes rather than inputs. The section distinguishes between different principles and the tensions between them. It is important to stress, however, that these are analytical distinctions that refer to emphases and trends and not descriptive distinctions. I introduce them to make explicit certain implications of introducing an NQF.

The first tension in qualification design is the extent to which either the principle of difference or the principle of similarity is emphasized. Traditional qualification systems at least implicitly assume that qualifications should emphasize differences. In other words, qualifications reflect particular purposes and assumptions about learning and knowledge; they do not assume that different qualifications (like academic and vocational qualifications) should necessarily have anything in common or be treated as equivalent. It followed that there was no attempt in traditional systems, until the first NOFs, to bring together academic and vocational qualifications, school and university qualifications or the different types of professional and vocational qualifications within a single framework. Inevitably this created problems of progression, transferability and portability, and was at odds with the much repeated claim that in the emerging global economy, occupational sectors are becoming more fluid, less insulated from each other and increasingly share common knowledge and skill requirements. Implicitly governments accepted what I refer here to as the principle of difference. From the late 1980s, policy-makers began to think that these problems could be solved by adopting an NQF that was based on the counter principle – the principle of similarity. In other words, they took the view that similarities were more important than differences between qualifications. The more comprehensive the proposed framework was, the stronger were the assumptions about equivalence. It followed that all qualifications were expected to comply with a single, generic definition of what counted as a qualification. The reality, however, is that differences in types of learning, and the skills and knowledge required by different occupational sectors and between qualifications related to general and vocational education, remain. Ensor (2003) gives a perceptive account of the problems that South Africa has had in trying to locate university and vocational qualifications in terms of the same framework criteria.

Another way in which the *principle of similarity* is expressed is in the idea that all qualifications share certain knowledge and skill requirements known as key or core skills or competences that can be expressed in terms of a single set of outcomes. ¹ The problems involved in designing and accrediting (let alone teaching) key skills is a complex issue which can only be touched on here. No one doubts that there are important generic capabilities such as team working, problem solving and communication that are not specific to particular occupational sectors. However, whether they can be taught or assessed independently of their links to specific contents and contexts is open to serious questions. At the most fundamental level, learning takes place in specific contexts and involves specific contents; it does not take place generically. The key types of common "skills" pose different pedagogic and assessment issues. For example, people learn how to solve specific problems which may be in physics or in dealing with difficult customers, but

¹ In South Africa key skills are known as critical cross field outcomes; however the latter cover a far more extensive and ambitious list.

there is no curriculum and no scheme of assessment that could teach or assess a form of generic problem solving that would apply to both. Another example is team working which may be better understood as an aspect of personality than a skill or body of knowledge. Lists of key or common skills can act as guides to encourage specialist teachers or assessors to broaden their approach to their subject, whether vocational or academic. All the research evidence suggests that such "skills" cannot be satisfactorily taught or assessed on their own. It can be argued that it is at the curriculum and institutional level that those capabilities which are common to a range of domains and occupations are best dealt with. The focus of assessment then becomes the institution not the individual student or trainee. It involves a form of inspection rather than an element of a qualification.

The second tension in designing a qualification framework is that between inputs and outcomes. Traditional (and many current) qualification systems not only relied strongly on inputs (usually in the form of syllabuses) in their definition of a qualification, but assumed that qualifications could not be expressed independently of either the content of learning, or the process and institutional setting in which it took place. This principle was expressed in its most traditional and extreme form in the case of university degrees which required specific periods of residence within the university and vocational and professional qualifications that were based on apprenticeships and "articles". In their concern with access, equality and the importance of providing evidence of what a learner "could do" as well as "what they know", those introducing NQFs have tended to assume that outcomes and inputs can (and must) be separated in the design of qualifications. However, there are examples of outcomes-based frameworks that incorporate inputs. Perhaps the best known is the National (Vocational) Certificate framework developed in Scotland. National Certificates (and the later qualifications that became part of the Higher Still Framework, Raffe, 2003) were designed in the form of outcomes, but with teachers who would have to convert outcomes into curricula. Separating outcomes from inputs creates a degree of flexibility; however, it is not clear how, independently of syllabus, an outcomes-based framework can ensure quality.

Traditional qualifications in fields such as engineering or crafts have, in many countries, relied on close links between qualifications and the trust placed by employers and others in well-respected college programmes and companies with long established apprenticeship schemes. In other words, it was the trust established over time between providers and users that gave credibility to the qualifications, and underpinned the confidence that was placed in the exams, the tests or the judgements by master craftsmen. The idea of an outcomes-based framework arose because, by the 1980s, in the UK, this trust was breaking down and government and some employers felt that vocational qualifications were becoming too institution-led or provider-led. Freed from any link with institutional provision and expressed in terms of standards agreed by employer bodies, it was hoped that qualifications based on an NQF would provide a guarantee of both quality and relevance. In practice, outcomes-based approaches have underplayed the extent to which institutions continue to have a role in guaranteeing the quality of a qualification. Outcomes rarely, if ever, stand on their own; new forms of trust in the outcomes and the standards have to be developed as a result of usage over a period of time; this leads us back to the importance of institutions, especially in a developing country where there may be few traditions of trust to build on, other than those associated with local communities.

One way in which outcomes-based frameworks seek to establish trust is through the registration of assessors. However, this is a new and largely untested procedure which itself relies on trust in the standards for assessors and in the provision of programmes for the training of assessors. It is unlikely that employers or others will value a set of standards when they are divorced, as in outcomes-based frameworks they necessarily are, from any institutional provision or practice. The question that I will return to is that if the argument is accepted that any qualification system relies on trust not criteria or definitions alone, how, in an outcomes-based system, is this trust established?

Section 5 – Problems with implementing NQFs

All countries implementing an NQF have faced problems. Most of them relate, in one way or another, to a point made earlier that governments invariably fail to recognize the radical implications of the changes that they seek to introduce. This failure may be expressed in a lack of political support or adequate resources for the agency or authority with specific responsibility for the NQF. It may also be that initial expectations are too high in terms of both what can be achieved, and how quickly the benefits of introducing an NQF are likely to become apparent. For understandable reasons, lack of government support is often given as an explanation of implementation difficulties by the new qualifications authorities themselves. However, lack of support or adequate resources are an endemic problem in most systems of education and training. They do not adequately explain the difficulties associated with implementing NQFs that may be specific to them. I will distinguish between political, administrative and what I shall refer to as "technical" or professional difficulties (although the issues are not technical in the narrow sense of the term).

Political difficulties can arise from the fact that the responsibility for an NOF is never easily located within one government department. In most national governments, the departments of education, labour and industry and trade are all likely to be involved and are likely to have different agendas concerning how an NQF should develop. Interdepartmental tensions have caused considerable, and as yet unresolved, difficulties in South Africa and various types of compromise have been proposed. In another case, New Zealand, the Qualifications Authority (NZQA) was itself seen as having too much power relative to the Department of Education, especially in the politically sensitive area of the school curriculum. This almost led to the complete collapse of the NQF itself; however this was avoided as power over the school curriculum was returned from the NZQA to the department. The decision to develop distinct academic "achievement standards" for the school curriculum in New Zealand were based on their own criteria (Phillips, 2003); in other words there was a recognition that the principle of similarity could not be extended to all types of learning and some differentiation was necessary. A broader political lesson from the New Zealand case is that the more an NQF seeks to be comprehensive the more it can pose a threat to the very government departments which launched it.

Administrative difficulties are most frequently expressed in the proliferation of new agencies and committees concerned with quality assurance, standard setting and assessment that NQFs invariably generate. Not only is there understandable uncertainty about the remit and responsibilities of these new agencies, but they frequently have difficulty in recruiting members and staff with appropriate expertise. Staff who lack the appropriate skills and knowledge can protect themselves behind bureaucratic procedures and delays in the registration of qualifications, rather than focusing on the quality of learning and the specific skills and knowledge to be acquired. This leads to a lack of confidence in the new qualifications and to complaints that the whole process is too slow. In the worst cases, it can lead to little more than ritual compliance by providers seeking to register qualifications.

Technical or professional problems (in the sense used here) refer to assessment, previously limited to the relatively straightforward activity of setting and marking examinations, and for the need for new language of standards, units and levels to define criteria that have to apply to very different qualifications. These descriptions are inevitably experienced as jargon by sectoral and other specialists and lay people who find it difficult to relate the new terms to the skills and knowledge with which they are familiar. Such problems are of course never just technical; they always involve judgements of value about learning and knowledge. The problems that such issues give rise to will be reduced if it is recognized that differences in the language used and in approaches to assessment are

inevitable, because there are real differences in types of learning and how different types of knowledge are acquired. Common approaches can only be developed over periods of time as a result of shared experience and use, not of tightly specified definitions.

A general point about the difficulties faced in introducing NQFs is that in an outcomes-based framework the processes involved, such as standard setting, inevitably lose contact with the practices of those involved in teaching, training, selecting and assessing. This poses real problems given that qualifications and the processes involved such as standard setting and assessment rely on trust, but have been separated from the very practices on which the trust would need to be based. Institutions have in the past been the primary resources of trust; the problem this raises for those introducing NQFs is to develop a new basis of trust that relates to outcomes and standards. It is difficult to see what the alternative is to locating the framework in new forms of partnerships between institutions.

Section 6 – Approaches to implementation: Lessons from "success stories"

Scotland, New Zealand and Ireland can be referred to as "success stories" in relation to implementing an NQF. I refer to success stories with some reservations: New Zealand has the oldest NQF but, as mentioned earlier, it almost collapsed after the first five years; Ireland is still in the early stages of implementation (Granville, 2003); Scotland has an NQF (the SCQF), but one which still operates largely as two separate frameworks for HE and the rest of education and training. Raffe (2003) indicates that for all the progress in developing the Scottish NQF, its future is by no means guaranteed; it has up to now relied on establishing, and not going beyond, a wide stakeholder consensus. As he points out, this consensus could be threatened if either the government decided to link the SCQF to funding, or a stronger regulatory element was introduced in a top down way. With these reservations in mind, Scotland, New Zealand and Ireland provide valuable insights into the implementation process which no country thinking about introducing an NQF can afford to ignore.

Although the Scottish Credit and Qualifications Framework (SCQF) postdates the NZQF, its forerunner the National Certificate Framework for vocational qualifications (Raffe, 2003) remains in many ways the "parent" framework which other countries look to – taking features which they like and sometimes neglecting the lessons that can be learned. Selective interpretations and borrowing have been an understandable, though highly problematic, feature of the spread of NQFs.

The most significant lesson from the Scottish experience is the importance of continuity and building on past experience. The SCQF was not a single radical innovation and a "break from the past", but a development which built upon a succession of "partial" framework innovations. These were the 16+ Action Plan for non academic learners, the reform of Higher National Diplomas for those seeking to progress to higher education via a vocational route, the Credit Accumulation and Transfer scheme (SCOTCAT) for linking higher education in different institutions and the Higher Still reform of upper secondary education. In other words, many of the building blocks for a comprehensive NQF were in place before the SCQF was launched. This did not just refer to the widening familiarity with modules, units, and framework criteria, but a growing body of shared practices. Three general features of the Scottish approach to implementation are worth mentioning. First, it was an *incrementalist* approach. An important aspect of Scottish incrementalism has been the long time sequence (at least 15 years) that led to the SCQF involving a series of linked reforms. This has meant that the introduction of the SCQF has not involved any complex standard-setting procedures, or the development of new qualifications. Second, the Scottish approach has recognized the importance of what Raffe (2003) refers to as policy breadth; this meant that the introduction of the SCQF depended on a number of other changes such as staff development programmes that had nothing directly to do with the NCQF itself, but which it depended on. Third, what stands out as distinctive about the Scottish case is that in its later stages, the SCQF developments were led by universities. As a result and unlike New Zealand and South Africa, the SCQF has generated no great cleavages and more important still, has not been associated only with slow learners and low achievers. Fourth, most of the "work" involved in establishing the SCQF has involved a range of different organizations that have been willing to collaborate with each other without losing their own autonomy. Unlike the cases of New Zealand, England and South Africa, 1 the SCQF has no bureaucracy; until very recently, it had only one (seconded) full

¹ The qualifications authorities responsible for the NQFs in England and New Zealand have a staff of several hundred and in South Africa about 70 (at the last count).

time member of staff! It was therefore almost impossible for the SCQF to take on a life of its own.

Despite appearing to be a relatively seamless process, the introduction of the SCQF has not been without its tensions. There are, not surprisingly, differing views of what implementation means, as well, as has been indicated earlier, as pressures to give more emphasis to certification and to use the framework for funding and therefore for greater governmental control. On the whole, however, it would appear that policy-makers in Scotland, at least up to now, have recognized that a qualifications framework cannot be allowed to develop too far ahead of existing practices of both providers and users and the trust on which such practices is based. The balance, so far is towards an "enabling framework" and it is significant that the SCQF has been most successful when the framework "tools" of level, credit and volume have been used to agree on equivalence in a specific case of equivalence – the question of access to higher education for those at work or in college who lack the conventional academic entry requirements. If there are general lessons from the Scottish "success story" they are that NQFs on their own have a relatively modest role in reforming qualifications and improving vocational education. Secondly, the role of the SCQF in supporting widening access to higher education suggests that trust in an NOF is more likely to be achieved through the support it can provide in specific cases rather than by any broader structural changes with which NQFs are often associated.

The second "success story", the NZQA, is a very different case with very different lessons for developing countries thinking of introducing an NQF. When it was first established it was undoubtedly the most comprehensive example of an NQF prior to the launch of the NQF in South Africa; in that sense it was the nearest to the "ideal type" structure described in Section 2. Like other NQFs, the roots of the NZQF can be found in behavioural learning theory and in the neo-liberal economics that was popular in the 1980s. Unlike the early development of an outcome-based framework in Scotland which began as an attempt to reform the vocational curriculum for lower achieving 16 year olds, it was economic factors that drove the introduction of the NZQF (Phillips, 2003). Not surprisingly, this led to a very different kind of framework and a very different strategy to that adopted in Scotland. Instead of starting with a specific problem, the New Zealand policy-makers started with a grand design; only later did they find that the grand design had to be "rolled back".

An important lesson from the New Zealand example is the political nature of any NQF, especially in cases where a new and powerful national organization such as a national qualifications authority is established (in this case the NZQA). Furthermore, early developments were characterized by head-on confrontations between the NZQA and its opponents in the schools and universities. This led to significant compromises and the recognition of the specific needs of different sectors. The New Zealand case brings out the key stakeholder role of upper secondary schools in any system of education and training as a result of their role in providing access to the universities. One evaluation of the NZQF (Phillips, 2003) suggested that the gains (in terms of opening opportunities for disadvantaged young people) are significant, but more modest, than the ambitious goals with which it began. This is a conclusion that is not so different from the one that might be reached on the basis of the Scottish experience, despite their very different beginnings.

The Irish NQF is one of the most recent and shares a number of common features with other national frameworks. Like others, it is based on outcomes and qualifications are defined independently of any specific sites of learning. On the other hand, it was not initially based on units and credit and its remit does not include schools or universities. Like other frameworks, its origins lie in the expanding (and in Ireland relatively new) and increasingly differentiated vocational, further and adult education sectors. Similarly, the essentially facilitative and non-directive approach of the Irish NQF is more like the SCQF in Scotland and less like those in South Africa and New Zealand or the NVQ framework in

the UK. In its policy process, the Irish framework also has similarities with the development of the SCQF in Scotland. It is incrementalist; it builds on previous developments and its introduction has been consultative, not directive. It is clear that there has been an attempt in Ireland to strike a balance between being too weak and hence not stimulating innovation, and being over-prescriptive and hence undermining local initiative. Like the South African NOF, with its critical cross field outcomes, the Irish NOF has the clear intention of promoting a broad view of lifelong learning and includes learning to learn and insight in its definition of learning outcomes. However, unlike the South African case the Irish are content to facilitate these goals rather than prescribe them. Its strategy for promoting "access, transfer and progression through the whole span of education and training" seems to rely on the same combination of local initiative and governmental support that has characterized the growth of the further education sector in Ireland in recent decades. Like the SCQF, the Irish NQF does not represent a dramatic break with the past. It seems to reflect a consensual approach that works in a society with a relatively small and well educated population without fundamental inequalities or large political cleavages.

There are some general implementation principles that emerge from these three cases which minimize the conflict and antagonism that has been a feature of NQF reform in England, New Zealand and South Africa. It stresses incrementalism, consensus and compromise, necessary building blocks and policy breadth. I will comment briefly on each of these points.

Incrementalism

The countries that have tried to make a radical break with their previous qualifications systems have had the most acute difficulties. A radical break gives neither practitioners nor those involved in design any benchmarks to test the new ideas against their experience. Incremental approaches minimize the likelihood that ideologies will intervene, and as a result are more likely to avoid polarized positions. The problem with an incrementalist approach is that it is unlikely to appeal to governments who feel the situation of their country is one of great urgency, as in the case of South Africa. The point to remember, however, is that even if a more radical "break" is attempted, the structural constraints on implementation may well extend the implementation period anyway.

Consensus and compromise

Consensus or agreement is the bedrock of trust and all qualifications depend on trust. Qualifications inevitably claim to represent more than they can demonstrate and therefore can only work on the basis of trust. Genuine consultation processes such as those that have been a feature of the Irish NQF are crucial and principled compromises such as that reached over the relations between the schools and universities and the NQF in New Zealand are important. The alternative which is typified by the rigid assertions followed by forced compromises over NVQs in England has meant that the whole idea of an NQF has tended to lose public and professional credibility. It is significant that despite being an early innovator in introducing the NVQ framework, 17 years later very little progress has been made towards developing a broader national framework in England.

Building blocks

Scotland demonstrates very well the importance of "partial" frameworks as building blocks for an NQF. Only when a range of partial frameworks – Higher Still, SCOTCAT, Higher National Diplomas and NVQs – was in place, was the comprehensive Scottish

Credit and Qualifications Framework introduced. It was the existence of the "building blocks" that established both the confidence in, and the practicality of, a broader more comprehensive qualifications framework (the SCQF). Here the term building block refers to specific levels (upper secondary or higher education) and sectors (vocational or academic or an industrial sector like engineering). It does not refer to the elements of a framework such as modules, units, standards, levels, and credits, although these may well form elements of partial frameworks.

The view taken in this report is that the idea of qualifications expressed as independent sets of outcomes expressed in terms of units, standards, levels, and credit is a radical and controversial change. However, this separation of qualifications as outcomes from the inputs that lead to them is also embodied in the competence-based approach to vocational education. It follows that unlike Vargas (2005) in his very useful and comprehensive review of Latin American and Caribbean developments, I see the competence-based approaches to VET not as steps or building blocks towards NQFs, but as part of the implementation of qualification frameworks. ²

It is not just a question of users and providers gaining familiarity with the idea of an outcomes-based framework, but how far it can become part of their practice without displacing other important educational priorities such as the specification of knowledge content and the identification of particular learning experiences. Level descriptors, standards and credit are at odds with many traditional pedagogic practices. It follows that at the very least they have to be piloted carefully before they are incorporated formally into qualifications.

Policy breadth

Although this concept was initially suggested by David Raffe in relation to Scotland (Raffe, 2003), it has a far more general value. It refers to the other conditions such as the availability of assessment systems, the adequate retraining of teachers, the existence of well developed sectoral organizations and the new partnerships without which an NQF can never be more than a "map". Raffe (2004) in a review of an evaluation of Dutch reforms by Nijhof and Esch (2004) points out that in contrast to developments in England, the Dutch case provides an excellent example of "policy breadth".

Comments

The implementation principles that I have developed from considering the three "success stories" cannot be straightforwardly generalized, especially to developing countries. The three countries referred to in this section are geographically and demographically small, relatively well resourced and relatively homogeneous culturally. Many, but not all, developing countries are small, as in the Caribbean, but almost without exception they lack resources and the necessary building blocks for an NQF, and are rarely homogeneous. It is therefore not surprising that, for example, sub-Saharan and Caribbean

² The danger of treating competence-based approaches as a step towards NQFs is that it can lead to a neglect of the extent to which the competence-based approaches themselves represent a break with institution- or input-based approaches.

countries have adopted more directive, even dirigiste, ³ approaches. The question must be raised as to whether such countries have the necessary human resources distributed across sectors and institutions to make such an approach viable. It is also understandable that in regions like the Caribbean and sub-Saharan Africa, smaller countries have followed uncritically the lead given by bigger countries (South Africa and Jamaica), even though the types of NQF that they copy may not be the most appropriate in their circumstances. It may be that more incrementalist approaches become the victim of political impatience; politicians always want quick results. However, the lessons from the three case studies, and from those countries that have followed a more directive route in moving towards an outcomes-based framework, are that it is mistaken for policy to move too far ahead of current practice. For example it is no good developing sophisticated level criteria and forms of credit rating if they cannot be related to practitioner experience. Both are like certain kinds of complex tools; people have to learn to use them and modify them on the basis of experience; such processes take time.

³ I use this term to emphasize the way some governments have gone ahead with introducing an NQF as a consequence of a sense of urgency, but with relatively minimum consultation or experience.

Section 7 - Further issues

There are a number of further issues that inevitably arise as a result of attempting to introduce an outcomes-based qualifications framework. This section considers a number of these issues:

Lifelong learning and employability

The encouragement of lifelong learning and its contribution to employability is widely stated by governments as part of their rationale for introducing an NQF. Superficially, at least, the opportunity for adults to continue to learn throughout their working lives is supported by a framework which can be used to accredit this learning. However, this link needs to be carefully examined in each case. Two relevant issues are worth exploring; these are the link between work-based learning and its accreditation and the relationship between the supply of, and demand for, qualifications. Learning is often a crucial aspect of doing a job well (or better) and it is important that both governments and senior managers find ways of encouraging it. However, it is only in specific cases that it is likely to be important that such learning is accredited. Two examples are worth mentioning. One refers to those employed in high skill sectors where mobility between jobs is high, where it is likely that a higher qualification will enhance the chances of promotion. However, this is likely to involve periods of study at a university or business school, rather than involving the accreditation mechanisms associated with a National Framework. In another case, however, there is evidence of employees failing complete higher level NVQs in management and administration because they find no link between the learning that they are involved in at work and the task of completing the assessment portfolio with introducing an NQF (Gugulis, 2002). Another example is a sector like social care discussed in an earlier section in which few employees in the past, at least at lower levels, had any qualifications at all. The success of NVQs in social care is a good example of how an accreditation approach to qualifications that forms an aspect of most NQFs, can, when appropriately supported, enhance the self-esteem and capabilities of traditionally low status employees.

As has already been indicated, whether or not the outcome of introducing an NQF is positive for the promotion of lifelong learning is heavily dependent on changes in the demand for skills and knowledge, which the NQF itself can do little to stimulate. Recent developments in South Africa are an indication of how important complementary *demand generating* initiatives are, especially in a developing country. The South African government has become increasingly aware that the chronic problems of unemployment and poverty will not be solved by the free market or just by establishing an NQF that encourages people to become better qualified. As an alternative, they are beginning to develop a strategy of investment in public works and the development of local infrastructure (for example, water, sanitation, housing and electrification). These developments should not only increase employment (and therefore reduce poverty), but could increase the demand for skills and knowledge; in this context, the NQF can play a role in supporting and shaping this demand by encouraging new provision and promoting the accreditation of work-based learning.

The role of stakeholders

Depending on how the membership of the new NQF agencies, such as standard setting and quality assurance bodies, is defined, an NQF can considerably extend the range of stakeholders involved. The benefits of this extension are the scope it provides for democratising decision making about qualifications and extending the sense of ownership

of the framework. However, if this process is pushed too far, especially in shifting the balance from experts in different occupational fields to stakeholders such as users, community organizations and trade unions, the design and development of qualifications can become increasingly bureaucratic and reduce, rather than increase, quality. There are a number of reasons for this. First, extending stakeholder involvement to groups in civil society, such as community associations and trade unions, makes considerable demands on the employed staff of already under-resourced organizations. This can well lead to excessive bureaucratic delays. Secondly, an overemphasis on stakeholders who have a political interest, but lack knowledge, can undermine the role of specialists from occupational sectors, and lead to downplaying the importance of knowledge content and quality in qualifications and approaches to assessment. Stakeholders should have a role that is similar to the governors of schools and colleges. If they are in a minority they can have a valuable role as guardians of the public interest. If they become a majority, or the boundaries between stakeholders and specialist becomes too blurred, there is a danger that special interests will dominate, and conflicts such as those between trade unions and employers are introduced into a field in which real expertise should be the main basis for resolving differences.

Modularity, unitization and credit

This subsection refers back to Section 3(iv) of this report. Most NQFs have been associated with developments variously referred to as unitization or modularization. Both are concerned with breaking up qualifications into smaller components known as modules or units. The evaluation literature suggests that these processes do introduce greater flexibility both for learners and users such as employers, but offers little support for the claim that they are mechanisms for broadening the distribution of, and access to, qualifications. Unitized qualifications are often proposed for slower learners on the assumption that they will find it easier to learn in, what in the UK has become known as, "bite-sized chunks". The problem with such an assumption is that if slower learners are only offered "bite-sized chunks", they are likely to become even less able to engage with more structured learning that can provide opportunities for progression.

It is important to make a distinction which is sometimes blurred between modularization and unitization. Modularization is best seen as a teacher-led or institutionled process in which the curriculum or teaching programme is the starting point; modules are a formalization and standardization of the informal sequencing that any teacher undertakes. Modules divide up a programme into discrete but coherently linked components or modules, with specific opportunities for students to make choices. Modules may, or may not, be linked to specific assessments. Unitization is a more radical departure from traditional approaches to the curriculum; it refers to the break up of qualifications not the curriculum, and is concerned with assessment rather than teaching. Traditional qualifications assume that all students or trainees begin together and are assessed at the end of a programme. Unitized frameworks treat units as the building blocks of many different qualifications and each unit is assessed and given credit separately. Instead of the teacher deciding the sequencing of the programme in a specific field, the student or trainee registers for units and then combines the units achieved to make up a qualification. The standard setting body lays down the rules of combination of units that lead to different qualifications. In a unitized framework it is units not whole qualifications, that are registered on the framework for the purposes of quality assurance. Unitization maximizes flexibility and choice, but minimizes coherence and the importance of structure in the acquisition of knowledge and skills. Many kinds of knowledge in general education (such as physics), and many skills (such as cabinet making) that are important in vocational qualifications, depend on a particular sequencing of learning defined by subject specialists and are not amenable to unitization.

Levels and level descriptors

An NQF is hardly conceivable without level descriptors for distinguishing the levels of difficulty involved in progressing from routine to more advanced capabilities in different occupational fields. However, while there are many statements of level descriptors, there are no examples that I am aware of a system in fully successful operation. Levels depend on the principle of similarity discussed earlier; in other words that it is possible to assign capabilities in fields as different as plumbing and business administration to the same level. In practice, the concept of a level is extremely difficult to apply in other than a very loose way. Another problem is that most actual qualifications, especially vocational qualifications, are multidimensional. In other words, differences in capability reflect differences on more than one axis. For example a level 3 or 4 qualification on the NVQ framework in the UK includes a level of knowledge and understanding and a capability to take responsibility for others with lower level qualifications and in positions of less seniority. This means that it is very difficult to have reliable descriptors based on a single set of levels. On the other hand, levelling – in other words making distinctions between levels of difficulty when assessing someone's performance – is a normal feature of the judgments that people involved in work and education and training make. The problem is how to codify this informal levelling into level descriptors without losing touch with practice. It seems likely that the best approach is, as suggested in this report for NQFs more generally, an incremental one. A national qualifications authority publishes a set of levels with loosely defined descriptors. Providers of qualifications are invited to comment on how they relate to the occupationally specific levelling with which they are familiar. They are also invited to locate their qualifications on the levels without having to follow a prescriptive set of rules for level descriptors. More explicit prescription of levels is only proposed where it arises out of providers coming to practical agreements on equivalence. One of the more thoughtful attempts to develop an approach to levels is that undertaken by the Victorian Qualifications Authority in Australia (VQA 2003: VQA 2004).

Assessment issues

An outcomes-based NOF implies a radically new approach to assessment based on formal criteria and the judgments of qualified assessors rather than the traditional approaches of examinations or tests. Whereas these new approaches arose from dissatisfaction with examination type assessment as only measuring what people could memorize in written answers, they pose almost insuperable difficulties. They represent an attempt to formalize in criteria of the judgements of the "meister" in the apprenticeship tradition when in many cases the organization of workplaces is no longer based on such roles and the actual "meister" is no longer available. The new approaches rely on two assumptions, both of which need questioning. The first is that objective judgements that apply to specific cases can be adequately expressed in criteria. The research evidence (Wolf, 1995) suggests that it is not possible to reliably locate specific cases according to general criteria. The second assumption is that assessors can be trained, even when they are not necessarily specialists in the particular field; in other words, their specialism becomes assessment. However, there is little evidence of confidence being established in trained assessors. Assessment becomes seen more as an instrument of management and can become reduced to the activity of "ticking boxes"; in the process the professionalism of teachers (and trainers) is undermined and quality is threatened.

There are two further problems with criterion-based assessment. The first concerns sampling. Whereas the meister, or master, drew on several years of observing an apprentice in a workshop in making his judgement, assessor judgments are made in relation to specific instances (or a small sample of them). It is rarely possible for them to generalize beyond the sample and even less possible to state with confidence that the

person being assessed has the required broader knowledge and skill to cope with all circumstances. The second problem concerns whether the person being assessed has the appropriate knowledge, either for a particular job or for progressing to a higher level qualification. Assessment criteria based on standards cannot provide evidence of knowledge (Young, 2004). This can, as in the case of NVQs in the UK, lead to the serious neglect of knowledge with consequences for the quality and status of vocational qualifications.

The only way that such difficulties can be overcome is if the NQF criteria are flexible enough to incorporate specific content as well as outcomes in their definition of a qualification, and that these are linked to appropriate forms of assessment which are likely to include examinations. In cases where critical safety issues are involved (as in NVQs in electrical installation), or legal issues arise (as in the case of NVQs for accountancy technicians and financial services), the professional bodies involved in the UK have been able to insist on the specification of content. This points to the important role of professional associations in ensuring quality at lower levels of any NQF. However, it inevitably limits the scope of the framework in two ways. Firstly, not all sectors with lower level qualifications have direct links to professional associations. Secondly, in accrediting informal learning which is unlikely to include the specification of contents, it would inevitably favour those with access to institutionalized learning.

The integration of vocational and academic learning

There are both administrative and political reasons for integrating all qualifications within a single framework. Administratively, a single integrated framework should be more coherent, easier to manage and ought to make all kinds of progression simpler. Politically, integration is tied to the idea of promoting parity of esteem between academic and vocational learning. In practice, integration can be a deeply divisive issue. Some in the general education community see it negatively as "dumbing down" the rigour of academic learning and doing away with the idea of education "for its own sake". Others see it as a way of broadening training by requiring it to be more educational. The training community is almost equally divided. Some welcome it as providing the basis for ensuring "parity of esteem" between academic and vocational learning, whereas others see it as leading to academic drift and undermining the importance of vocational qualifications as indicators of competence. The underlying issue is about purposes, and the balance between the two principles of similarity and difference discussed in Section 3. General and vocational education pathways do have different purposes - intellectual development and occupational capability. However, they can be linked – in other words cross over between them can be possible because elements of general education can contribute to progression in vocational education and vice versa. On the other hand, at least at present, they cannot be integrated unless their different purposes are seen as unimportant. The possibility therefore is linked frameworks in which some of the components of each are "transportable" between them. This approach is however based on the assumption that vocational education is always partly educational and only partly about preparation for employment.

Swedish and Scottish upper secondary qualifications are probably the most integrated or unified, whereas those found in France and England, where vocational qualifications can be the basis for progression to higher education, can be described as linked. Some NQF proposals (examples are those in New Zealand and South Africa) have had the integration of academic and vocational education as goals; however it has been dropped in the New Zealand case and is the subject of continuing debate in South Africa. However, the most recent proposals from developing countries have focused on developing an NQF from vocational qualifications. The Scottish experience suggests that integration is best seen as a long-term goal, and a focus on developing a vocational qualifications framework

is a more realistic starting point, provided it is not, as was the case of NVQs in the UK, based on exclusive performance criteria. A national framework for vocational qualifications can then be a building block for a more comprehensive framework.

The accreditation of prior (experiential or informal) learning (APEL)

One of the expectations that has been widely associated with the introduction of an NQF is its potential for accrediting informal (or, as it is frequently known, prior experiential) learning. This process is seen as shifting the balance of access to qualifications towards those who have unaccredited skills but have been excluded from formal schooling. However, while undoubtedly people do acquire considerable skills and knowledge in informal ways, the promises of an NQF in this respect have not been realized. There are a number of reasons for this.

First, there is only limited compatibility between informal skills and knowledge developed in specific circumstances of, for example, rural community life, and the kind of skills and knowledge that can be formally accredited. In the process of accreditation, some form of codification or formalization is unavoidable; however, in this process the distinctive contextually-specific character of informal learning is undermined without any compensating benefits. Second, when people do get formal qualifications through APEL, such qualifications are rarely recognized as equivalent to those obtained by formal study. The legacy of the link between provision and qualifications remains. Third, there is a discrepancy between the activities required to submit evidence of the learning engaged in at work and the actual learning involved; this inevitably inhibits the original motivation for gaining a qualification and is one explanation of why few people achieve qualifications in this way. Arguably this is not just a technical difficulty to be overcome, but a reflection of fundamental differences between two types of learning - the learning that involves acquiring knowledge and skills that may be useful later, and the learning that is embedded in the problems that need to be solved in any everyday working environment. Fourth, a substantial infrastructure, including assessment centres and trained assessors that are widely distributed and accessible, is required if APEL is to be extended on a significant scale. This is rarely feasible even in well-resourced countries, and in less-resourced countries, it can be argued that the money could be better spent establishing new programmes rather than assessment centres. Fifth, if a major goal of developing an APEL system is to improve people's employability, it is more likely that they will need access to further opportunities to study than merely to get their existing knowledge and skills accredited.

In light of these observations, it is useful to make a distinction between "APEL for qualifications" and "APEL for access" – in other words APEL as a way of enabling people, without conventional formal qualifications, to gain access to further or higher education. There are many successful examples of the latter in the UK and elsewhere and it seems likely, especially when resources are limited, that it is the better investment. Indirectly "APEL for access" has the advantage of providing staff development opportunities for teaching staff who may previously have had little experience of teaching students without formal qualifications.

The professional development of teachers and trainers

The level of skills and knowledge of teachers (and work-based instructors) is a key determinant of the quality of any country's system of education and training. Without a major policy focus on improving the teacher and trainer workforce, an NQF, which emphasizes the assessment more than the improvement of learning and which inevitably

makes new and difficult demands on teachers to rethink their own practice, can play a negative rather than a positive role. This is especially true if a significant proportion of resources for the professional development of teachers is devoted to assessor training. ¹

The importance of professional development is another way of stressing the issue of institutional capability. However, in relation to the demands of an NQF, it is not just a question of a shortage of teachers but of the professional development of existing teachers.

Costs

It is beyond the scope of this report to comment in any detail on the issue of costs, important though it is. Treated as a separate and distinct policy initiative as it has been in New Zealand, South Africa and the UK, an NQF is always seen as taking resources away from other activities. Treated as a way of reforming and extending examinations and testing, it takes on a more strategic role. There are, however, two principles that echo throughout this report – trust and professionalism – that might be applied to the issue of costs. High cost systems of assessment and examinations are a feature of low trust systems of education and training, like the UK where there is a considerable lack of confidence in teachers assessing their own students, at least below university level. As a result the UK, especially England, has proliferated organizations known as Awarding Bodies which specialize in testing and certificating students. As trust has been undermined in even traditionally high trust sectors such as universities, new forms of quality assurance have been introduced that have accentuated this high cost trend. This trend is partly a consequence of the massification of education and training at all levels. However, it also reflects features of the educational and wider culture.

High costs systems of testing and certificating for qualifications are not features to anything like the same extent of high trust systems like Germany, where much more assessment is left to teachers. The implications are that a developing country should opt for building institutional capacity and improved teacher training and professional development as the basis for developing trust in the educational community and within its different sectors. Costs will, at least, be minimized if the wider community develops its trust in its teachers. As institutional capacity develops, an NQF can develop a loose and relatively low cost guidance role. The role of international aid in developing countries is important. South Africa has relied, for 80 per cent of its funding for the NQF, on an EU grant. Would South Africa have introduced an NQF without EU funding for it? How long will EU funding continue? One consequence of donor funding is that there has been less need for an independent evaluation of the benefits of funding the NQF relative to other possibilities. ²

¹ In the UK, teachers wanting to assess students for the new outcomes-based national vocational qualifications were required to gain new assessor qualifications. They frequently experienced this requirement as deskilling and undermining their professionalism without offering them any new skills or knowledge (Lucas, 2004).

² There has been a Ministerial Review of the South African NQF (DOE/DOL 2002), but that was limited by its terms of reference to implementation issues.

Section 8 - Alternatives

In earlier sections of this report I have stressed the problems involved in introducing an NOF which most government seem, at least overtly, reluctant to recognize. One alternative approach is not starting with a grand design of an NQF, but to begin by looking for concrete evidence of common practice and where there is a will to explore common practices. This evidence could then be used to support the establishment of "partial" frameworks which might be "ends in themselves" from the point of view of the participants, but be seen as building blocks leading towards a more comprehensive framework from the point of view of government. New countries have an advantage that they can see how, in other countries, partial frameworks have led to a framework which progressively becomes more comprehensive, at the same time as retaining its basis in the work of practitioners. Another possibility is that small developing countries could, as in the Caribbean, identify the scope for a collaborative local framework and working with neighbouring countries which are in advance of them. Small countries need, however, to be cautious in adopting a comprehensive framework at the beginning rather than seeing it as the outcome of a series of steps over time. The present Scottish Framework (SCQF) had its beginnings 15-20 years before it was launched.

A second implication of existing experience is that the sectors where there has been greatest resistance to NQFs have always been the universities and the upper secondary schools. The former have high prestige and usually have a long tradition of autonomy in relation to awarding qualifications. Not surprisingly they are reluctant to lose this autonomy to a new national qualifications authority with little experience or expertise. In many developing countries, the university sector is relatively strong, albeit small and with a relatively good reputation for quality. The real weaknesses frequently lie in secondary and vocational and technical education. It would be unfortunate if the development of an NQF is held up by the Qualifications Authority becoming distracted by negotiations with a reluctant university sector where the need for an overarching body is likely to be so much less.

In virtually every country, the resistance of upper secondary schools to the introduction of an NQF has reflected their links with "high stakes" examinations that are the basis of selection for university. As a result, they can call on powerful political support in resisting anything but a weak version of a framework. However, as with universities, academic upper secondary education is unlikely to be the weakest link in the education and training system of a developing country. A partial framework bringing together adult, vocational and further education on the lines being developed in Ireland is likely to lead to greater benefits.

The implications of this analysis is that there is much to be said for leaving the universities and upper secondary schools out of any initial NQF and encouraging the universities (or higher education), in association with the upper secondary schools to develop a framework of their own, which might at a later date be incorporated into a full national framework. This need not be seen as a political compromise giving way to vested interests, but as a principled decision that could, in the long term, pave the way for a more comprehensive framework.

A very different way of looking at alternatives is to consider examples of those countries adopting an *institution-based* as opposed to an outcomes-based approach to qualifications (Young, 2002). Typical countries adopting an *institution-based* approach are

those in continental Europe such as the Nordic countries, ¹ France and Germany, most South-East Asian countries and the Francophone countries of western and central Africa. The United States is difficult to classify, but it certainly has not developed anything similar to an NQF. The USA approach to qualifications might be best described as based on regional institutional networks (Grubb and Lazerson, 2003).

The institution-based approach treats institutions, staff development, progression routes, certification and qualifications as all parts of an integrated system. Government policy focuses on the reform and expansion of institutions and the links between different types and levels of institution. Qualifications are not treated as separate instruments of policy, and qualification reform develops alongside institutional change. The dilemma for developing countries is that this is a high resource approach; change involves whole system change which is difficult.

There are two possible variations within an institution-led approach. One involves treating the development of an outcomes-based NQF as following the development of institutions in time. This seems to be what Singapore is doing in launching an outcomesbased framework on the basis of a strong existing institution-led system. The implications of this sequencing approach for an international organization like the ILO is that an investigation of what the South East Asian countries were doing 40 or 50 years ago, when most of them had similar characteristics as today's developing countries, might be useful (Ashton, 2005). The second variation within an institution-led approach is for governments to encourage a more powerful role on the part of private sector (or foreign) institutions and to see the primary role of an NQF as regulating and assuring quality in an expanding private sector. The advantage of this approach for developing countries is that it makes fewer demands on scarce public sector funds. However, it is fraught with difficulties, not least because effective regulation of private sector providers is far from straightforward and like any other regulatory activity, requires considerable capacity of its own. Furthermore, whether the new providers are from the profit making private sector or franchising from foreign institutions, they will have their agendas which are unlikely to be shared by the developing country.

¹ Sweden, Finland and Norway are developing Accreditation Frameworks for vocational qualifications. However these are in addition to what remain largely institution-led systems and are geared specifically towards adult learners; they do not imply a transformation of the existing national systems in these countries or that they are adopting an NQF in the sense discussed in this report.

Section 9 - NQFs and developing countries

Implications of the analysis

Given the history of NQFs in the last 20 years, it is inevitable that most of the experiences on which this report draws (with the exception of South Africa), come from industrialized countries such as England, Scotland and New Zealand – all countries with relatively high levels of resources. It is therefore with caution that one extrapolates beyond the level of analysis to make prescriptions. On the other hand, my own research and experience in South Africa, although a far from typical developing country, suggests that it is extremely important that developing countries considering the introduction of an NQF do learn lessons from the experience of countries which have already moved in that direction. In particular, it is important that they do not assume that an NQF is any kind of "magic wand" of educational reform. There are no prescriptions or "how to do it" manuals to read from other countries and the attempt to do so by the indiscriminate employment of foreign consultants is likely to lead to many of the problems discussed in this report. Anything other than a cautious approach, aware, on the one hand of the limited role of an NQF in achieving change, and on the other hand that NQFs can never be seen in isolation, is likely to face the kind of difficulties experienced in the implementation of the NQF in South Africa (Young, 2003b).

An important, but less contentious, issue is that developing countries are under considerable pressure to get their qualifications recognized internationally. The development of the "referencing" role of NQFs is consistent with the broader trend to internationalization, which is a feature of European countries as the EU drives the development of a European qualifications framework. In this regard the idea of a referencing rather than a regulatory role for NQFs developed by CEDEFOP may be worth exploring (CEDEFOP, 2004). The trend towards international accreditation needs to be treated not just as an opportunity for developing countries to get their qualifications recognized internationally, but as an opportunity to learn about what really happens in other countries.

Section 10 – Conclusions and future possibilities

The main thrust of this report has been cautionary. It has warned that NQFs, like the competence models of vocational education before them, have been over-hyped at government level and sometimes supported uncritically both by educational activists who see them as an instrument of radical transformation, and for less scrupulous reasons by international consultants.

The future of NQFs is likely to be far less dramatic than the hype. There is undoubtedly evidence of convergence and increased mobility both within and between national economies, and this lends support to at least some of the assumptions of the movement to introduce NQFs. Qualification systems are likely to become more, not less, international and make more demands on NQFs as systems of reference or quality assurance. NQFs, even if undeveloped and relatively "loose" in the sense described in this report, can contribute in modest to the greater integration of the developed and developing worlds from which both can benefit, provided lessons are learned from past experience, and they do not get bogged down in the complex and ultimately disastrous specifying of standards, units, levels and credit systems and quality assurance. It is also possible, if the implementation of NOFs is not forced through prematurely, that the existence of even a relatively "loose" framework could contribute to cross-sector dialogues and agreements, which might not have happened without it. In the process, it is possible that those involved in formal education, employers and employees and the wider community will develop a greater understanding of the kinds of learning that are possible in such different contexts, and as a result develop a greater trust in the potential of equivalences. My argument, however, has been that this will only occur on the basis of recognizing the fundamental differences between the types of learning and knowledge rather than assuming their equivalence a priori.

It is less clear that NQFs are a tool either for redistributing education and training opportunities, or for stimulating demand for more people to get qualified, as governments in many developing countries hope. Inequalities in education are a product of the institutional arrangements of a society; it is these institutional arrangements more than the qualification structure that sustain wider inequalities. Another reason for being cautionary about the distributional possibilities of NQFs is that the potential, at least on its own, of accrediting the informal, the experiential and the tacit dimensions and types of learning and knowledge has been vastly exaggerated. All learning involves a tacit dimension; it is never adequately described as the transmission of formal knowledge or skills. However, much tacit or experiential learning, while important for everyday living, is limited on its own, because it remains cut off from the powerful bodies of knowledge that human societies have developed over the centuries, and from which so many in developing countries are excluded.

The limitations of an NQF are inherent in the assumption that learning can be adequately expressed in terms of outcomes. Outcomes cannot grasp the nature of bodies of knowledge and the complex processes we describe as transmission, pedagogy and curriculum through which they are acquired and renewed. An effective NQF must expand the space for these processes and will be better able to do this if it is less, rather than more, prescriptive. Narrow prescription is always a product of insecurity and a search for certainty and accountability in a world which is neither certain nor accountable. These are understandable goals. However, not only are they unachievable, the price paid for trying, that involves routines replacing rigour, is too high.

A major theme of this report has been the importance of trust and the dependence of qualifications, and therefore NQFs, on trust. Trust, especially in developing countries is

scarce beyond that located in small communities; it has to be created. It is in creating trust that a developmental rather than a regulatory approach to an NQF needs to be supported; groups and sectors can be asked to pilot levels and standards and report back. Establishing trust is incompatible with a narrow prescription of outcomes, especially where both skills and bodies of knowledge are becoming more fluid and changing faster than ever before. In these new circumstances, establishing trust rather than merely setting and monitoring standards will be the major task of qualification agencies and authorities.

Developing countries, as in all things, have acute difficulties hardly recognized by those of us in Europe and North America. Sometimes as in the case of the invention of microcredit arrangements in Bangladesh, these difficulties can be sources of innovation. The analogy of qualifications as a currency can only be taken so far, even though banks also rely on trust. Education and training are institutions and processes which can dramatically extend and expand learning. Expanded local learning needs qualification frameworks to link the learning acquired in local institutions into more formalized systems and provide pathways to their highest reaches. It is in institution building, supported by a developmental approach to qualification frameworks, that developing countries must put their investment and their energies, not the other way round.

Options

Three factors have been identified in this report as inhibiting the implementation of NQFs. They are: (i) over-complex approaches; (ii) over-ambitious visions; and (iii) top down strategies. None of these approaches to implementation take account of the realities in which qualifications actually work. A logical conclusion would appear to be that any future strategy especially for a developing country with limited resources should be based on simplicity, an incremental vision and encouraging local initiative.

My own conclusion is that there is more merit in the latter two than the former. Anyone looking at the complexity of the documents generated by the QCA, SAQA or the NZQA could not but endorse the merits of simplicity; they are jargon ridden and often unreadable except to those who have written them or explicitly learned to read them. Furthermore, there are no unambiguous ways in which the criteria and standards developed can be linked to specific and concrete examples of learning. However, simplification is not an answer because qualification frameworks that seek to include all types of institutionand work-based learning, at all levels and in all sectors, cannot avoid being complex. Simplification on its own would only lead to confusion and greater ambiguity. The real problem is that only those working in national qualifications authorities have the need to grasp all the complexities that frameworks try to include (just as only airline pilots need to be able to follow a map that stretches across continents). Most people need to understand some qualifications and where they lead to and the possibilities of progression from the routes and qualifications that they know or are interested in. This suggests that a beginning should be made where people, employers, students, trainees and other users find themselves and work out towards national frameworks as the need arises. Hence there is a strong argument for encouraging locally generated (using local not just in the geographical sense) partial frameworks that link institutions and, where appropriate, their communities. The role of the national qualification authority becomes to seek ways of supporting the development of partial frameworks and, at appropriate points when they have gained confidence and trust, helping them to link nationally and internationally.

The second theme that I have referred to is incrementalism; however this poses two problems. The first is "what are the increments"? The second is that the countries like Scotland that have developed an incremental strategy did not have an NQF in mind when they launched their first incremental step towards an NQF – the 16+ Action Plan for a National Certificate. New countries cannot begin where Scotland was. However, they can

draw on the experience of Scotland and begin where the need is greatest and where there is real political support and at least some expertise. They can link local regional and sector initiatives to a long-term vision. They can draw on the potential of collaborating with neighbouring countries – not necessarily in regional frameworks, but in pooling resources for research and development and pilots. NQFs need units, credits and level descriptors, but they are not increments in the sense used in this report. They have to be embedded in their uses, not developed as abstract lists as is so often seen. A fully workable NQF is not something that can be designed in advance of implementation; it will be the outcome of many different initiatives and reforms developed over many years. There is no other way.

Bibliography and further reading

- Allais, S.M., 2003: "The National Qualifications Framework in South Africa: A democratic project trapped in a neo-liberal paradigm?", in *Journal of Education and Work*.
- Ashton, D., 2005: "High skills: The concept and its application in South Africa", in *Journal of Education and Work* (Special Issue on skill development in South Africa).
- Bouder, A., 2003: "Qualifications in France: Towards a national framework", in *Journal of Education and Work*.
- Callaghan, R., 1961: Education and the cult of efficiency.
- CEDEFOP, 2004: European reference levels for education and training: An important parameter for promoting credit transfer and mutual trust, Thessaloniki, Greece.
- Commonwealth Secretariat, 2003: National qualification frameworks in the Commonwealth, London.
- Departments of Education and Labour, 2002: Report of the Study Team on the Implementation of the National Qualifications Framework, Pretoria.
- Ensor, P., 2003: "The National Qualifications Framework and higher education in South Africa: Some epistemological issues", in *Journal of Education and Work*.
- Ertl, H., 2002: "The concept of modularization in vocational education and training: The debate in Germany and its implications", in *Oxford Review of Education*.
- Granville, G., 2003: "Stop making sense': Chaos and coherence in the formulation of the Irish Qualifications Framework", in *Journal of Education and Work*, Vol. 16, No. 3, pp. 259-270.
- Grubb, N.; Lazerson, M., 2003: "Ambiguities of vocational preparation: The separation of schooling from work", in *The vocational roles of American schooling* (Harvard University Press) (forthcoming).
- Gugulis, I., 2002: Skill and qualification: The contribution of NVQs to raising skill levels, SKOPE Research Paper No. 36, University of Warwick, UK.
- Jessup, G., 1991: Outcomes: NVQs and the emerging model of education and training (London, Falmer Press).
- Keating, J., 2003: "Qualifications frameworks in Australia", in *Journal of Education and Work*.
- Lave, J.; Wenger, E., 1991: Situated learning: Legitimate peripheral participation (Cambridge, Cambridge University Press).
- Lucas, N., 2004: *Teaching in further education: New perspectives for a changing context* (London, Institute of Education, University of London).

- Nijhof, W.J.; Van Esch, W. (eds.), 2004: Unravelling policy, power, process and performance: The formative evaluation of the Dutch Adult and Vocational Education Act (Hertogenbosch, CINOP).
- NTB, 1997: Phase 2 Report, Education, Training and Development Practices Project (Pretoria, National Training Board and GTZ).
- Phillips, D., 2003: "Lessons from the New Zealand Qualifications Framework", in *Journal of Education and Work*.
- QCA, 2004: New thinking on reform (London, QCA).
- Raffe, D., 2004: "Review of Nijhof and Esch (2004)", in *Journal of Education and Work* (forthcoming).
- -, 2003: "Simplicity itself': The creation of the Scottish Credit and Qualifications Framework", in *Journal of Education and Work*.
- Raggatt, P.; Williams, S., 1999: Government, markets and vocational qualifications: An anatomy of policy (London, Falmer Press).
- Scottish Vocational Education Council (SCOTVEC), 1994: Guide to unit writing (Glasgow).
- Strathdee, R., 2003: "The Qualifications Framework in New Zealand: Reproducing existing inequalities or disrupting the positional conflict for credentials", in *Journal of Education and Work*, Vol. 16, No. 2, June.
- Tuck, R.; Hart, J.; Keevy, R., 2004: "The relevance of the National Qualifications Framework Impact Study to qualification framework development in the Southern African Development Community", unpublished conference paper, SAQA, Pretoria, South Africa.
- Unwin, L.; Fuller, A.; Turbin, J.; Young, M., 2004: What determines the impact of vocational qualifications; A literature review, Department for Education and Skills, Research Report 522, London.
- Vargas, F.Z., 2005: Key competencies and lifelong learning: Three perspectives on these subjects in Latin America and the Caribbean, Skills and Employability Department/CINTERFOR, ILO and Swiss Agency for Development and Cooperation.
- Victorian Qualifications Authority, 2003; 2003; 2004: *The Credit Matrix; The Credit Matrix Next Steps; The Credit Matrix Towards Implementation* (Melbourne, Australia).
- Wolf, A., 2002: Does education matter? (London, Penguin).
- -, 1995: Competence-based assessment (Buckingham, Open University Press).
- Young, M., 2001: Chapter 2, in Young, M. and Kraak, A.: *Education in retrospect* (London and Pretoria (HSRC), Institute of Education).
- Young, M., 2002: "Contrasting approaches to qualifications", in Evans, K.; Hodkinson, P.; Unwin, L. (eds.): *Working to learn* (Kogan Page, London).

- -, 2003a: "National qualifications frameworks as a global phenomenon: A comparative perspective", in *Journal of Education and Work*, editorial introduction, Vol. 16, No. 3, pp. 223-237.
- -, 2003b: A conceptual critique of an interdependent qualification framework system, Council on Higher Education, Pretoria, South Africa.
- -, 2004: "Conceptualising vocational knowledge: Some theoretical considerations", in Rainbird, H.; Fuller, A.; Munro, A. (eds.): *Work place learning in context* (London, RoutledgeFalmer).