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National Qualifications Frameworks: What can be learnt from the international experience?

Abstract
This article asks how countries considering the introduction of a National Qualifications Framework (NQF) can use cross-national research on NQFs to inform their deliberations. It proposes a model of policy learning, which uses international experience in a broad range of ways to inform country-specific policy debates, rather than a policy borrowing approach which scans this experience for unique and transferable models of best practice. As more and more countries introduce NQFs the knowledge base on their design, implementation and impacts is slowly improving, although it is still inadequate and the causal processes involved are complex and often difficult to unravel. The paper presents six “stylised facts” or broad generalisations from the international experience, and discusses some of their implications and the issues that they raise. These are: that qualifications, and therefore NQFs, are social and political constructs; that NQFs are multi-purpose tools; that NQFs differ; that most comprehensive NQFs are multi-level entities; that an NQF may involve diverse change processes; and that an NQF is not the only policy instrument.

Keywords
National Qualifications Framework, comparative research, policy learning, education policy, educational change, institutional logic.

Introduction: policy borrowing and policy learning
One of the central debates running through cross-national social research is between methods and approaches which emphasise countries’ similarities and those which emphasise their differences (Kohn 1987; Øyen 1990; Ragin 1987). On one side of this debate is research which seeks to “replace countries by variables” and establish universal laws and patterns independent of specific national contexts; on the other side is research which aims to elucidate national uniqueness and uses comparisons to clarify the cultures, processes and institutional logics characteristic of each country. The first side emphasises isomorphism and convergence, the other side emphasises national specificity and path-dependence. Many comparative educational researchers, especially those with a sociological background, reject the universalism of the former approach and accept that each country has its distinctive logics. However, they typically follow an intermediate approach and avoid the false dichotomy between “nomothetic” and “idiographic” approaches (Schriewer 1999, p. 61). They look for cross-national generalisations and for national distinctiveness, and do not see these as mutually incompatible.
A parallel debate is found among those who use cross-national comparisons to inform national policy-making. On the one hand, many policy-makers see international experience as a source of policy borrowing; comparative research is a search for unique models of best practice which can be abstracted from their contexts and transferred, or at least adapted, to the domestic context (Philips and Ochs 2003). On the other hand are policy researchers who use cross-national comparison for policy learning. This encompasses a much broader range of purposes than policy borrowing, such as understanding one’s own national system better, identifying common trends and pressures, clarifying alternative policy strategies and exploring practical issues likely to be raised by each strategy. Rather than using foreign experience to cut short domestic policy debates, because the solutions can be imported from abroad, the policy learning approach uses that experience to inform those debates and enrich them, by offering new insights, perspectives, and concepts as well as empirical experience (Alexander et al. 1999; Chakroun 2010; Crossley and Watson 2003; Raffe and Spours 2007). However, in the same way that most comparative researchers follow an intermediate path between nomothetic and idiographic approaches, the policy learning approach does not deny that cross-national generalisations are ever possible or that policies can ever be transferable. Instead, it contends that whether policies can be transferred between countries (and to what extent and in what ways) should be an outcome of comparative enquiry rather than its initial premise.

This paper considers how international experience can inform policy debates in Slovenia or, indeed, other countries planning to introduce an NQF. It does so by presenting six “stylised facts” or broad generalisations from the growing international evidence base from social-science research on NQFs. It adopts a policy-learning perspective: that is, it assumes that foreign experience can enrich the Slovenian debate on whether to adopt an NQF, or the type of framework to adopt, but in the last analysis the debate must be conducted within Slovenia, in the interests not only of democracy but also of good decision-making. It is concerned with the science of policy learning. The science of policy learning is the endeavour to identify the policy lessons that may validly be drawn from international experience (e.g. Alexander et al. 1999); it belongs to the branch of policy research which aims to inform and influence policy-making. The sociology of policy learning is the study of the learning that actually takes place when policy-makers and those who influence them draw on international experience, regardless of the scientific validity of the processes or conclusions of this learning (e.g. Steiner-Khamsi 2004); the sociology of policy learning therefore belongs to the branch of policy research which treats policy and policy-making as the object of study. Only in a world of perfectly rational policy-making, where policy decisions are based solely on the “science”, do the science and the sociology of policy learning coincide. We therefore need to distinguish between them in order to avoid the tacit assumption that policy-making is always rational. However, there is a growing interest among some international policy organisations in
what might be called the *action-research* of policy learning in relation to NQFs. The action-research intervenes in the sociology of policy learning in order to create space for the science of policy learning. It is reflected in attempts by organisations such as the European Training Foundation (ETF) to develop the capacity, the knowledge base and the policy processes within partner countries that enable them to develop nationally-appropriate policies rather than accept those imposed on them by experts or donor organisations (ETF 2008; Chakroun 2010).

**The evidence base for policy learning in NQFs**

There is a growing literature on the sociology of policy learning in relation to NQFs. There was extensive mutual learning among the early anglophone frameworks of Australia, England, Ireland, New Zealand, Scotland and South Africa, and these in turn have influenced subsequent NQF developments across the globe (Allais 2010; Chisholm 2007; Philips 1998). Most of this learning was policy borrowing rather than policy learning in the sense described above; as Mukora (2006) notes, South Africa was quick to copy the models developed in Australia and New Zealand but it was much slower to learn from the experience of those models in practice. However, Karseth and Solbøkke (2010) note how the global model of the Bologna qualifications framework has been modified and translated within different national contexts. National diversity is a recurring theme of the literature on NQFs.

By contrast, the evidence base to support the science of policy learning in NQFs is relatively weak. There is a large literature on national developments but most of this is descriptive and reports policy intentions rather than actual impacts. Even the OECD’s report on *Qualifications Systems: Bridges to Lifelong Learning* (OECD 2007), one of the first systematic attempts to review international qualifications developments, draws its conclusions about the policy role of NQFs on the basis of their objectives rather than evidence on whether these objectives are achieved. The impacts of an NQF take a long time to appear; few NQFs existed before the early 2000s, and even today few are fully implemented, so the scope for an evidence base is weak. However, the position is slowly improving, fed by at least four developments. First, more-or-less independent evaluations or reviews of several earlier frameworks have been conducted and their results are in the public domain (e.g. Collins et al. 2009; Gallacher et al. 2005; RSA 2002). Second, these reviews are complemented by theoretically informed analyses by social scientists, drawing on perspectives and insights from the sociology of knowledge, political economy, the sociology of education and labour markets, the new institutionalism and organisational theories. While most of these analyses have focused on particular frameworks their insights have had wider currency. Examples are found in the journal special issues edited by Young (2003; e.g. Ensor 2003; Granville 2003; Keating 2003) and Young and Gordon (2007; e.g. Allais 2007a; Boudier and Kirsch 2007; Raffe 2007). Third, there have been vigorous debates among European researchers on the likely impacts of the European Qualifications Framework (EQF) and of NQFs designed to link to it. This
debate has encouraged a revival of interest in the differences among European education and training systems, and especially of vocational education and training (VET) systems. Examples are found in journal special issues (Sellin 2007-08; JEIT 2008; e.g. Bohlinger 2007-08; Hanf and Rein 2007-08; Hozjan 2007-08; Bouder 2008; Rauner 2008) and in comparative studies such as that of Brockmann et al. (2011). The fourth development is the growing number of systematic comparisons of NQFs, often synthesising existing country studies but sometimes based on purpose-designed comparative studies. Organisations such as CEDEFOP, ETF and the International Labour Office (ILO) have commissioned cross-national reviews (Young 2005; Coles 2006) and collected data on NQFs as part of a continuing monitoring process (CEDEFOP 2010; ETF 2010); a recent study by the ILO, supported by the ETF, collected a wider range of data on the implementation and impact of 16 NQFs from all continents of the globe (Allais 2010).

The evidence base for policy learning is therefore growing. It is still incomplete; we know much more about the implementation of NQFs than about their impact. And it draws heavily on the experience of a small number of longer-established comprehensive frameworks, including Australia, England, France, Ireland, Malaysia, Mauritius, New Zealand, Scotland and South Africa, which have been in existence for long enough for impacts to be observed. These frameworks were introduced before the regional meta-frameworks such as the EQF, in contrast to later frameworks which were introduced in response to them, and most were introduced in anglophone countries, or countries with a strong anglophone influence, often in order to address the characteristics weaknesses of education and training in those countries. This makes the established non-anglophone frameworks, such as France, particularly interesting (Bouder and Kirsch 2007). However, even the anglophone frameworks are diverse, as we see below, although it remains to be seen how widely policy lessons based on them can be applied to new contexts. The stylised facts or generalisations based on their experience, to which I now turn, draw on this evidence base. Like all research on NQFs, they are open to revision or refutation as evidence accumulates.

**Six generalisations about NQFs**

*Qualifications, and therefore NQFs, are social and political constructs*

Many policy discussions of NQFs are conducted in a technical language that views frameworks as mechanical devices to be plugged in and switched on. However, qualifications, and therefore NQFs, are social and political constructs, based on deeply rooted social relations and practices and political interests. Their effectiveness depends on a range of social factors such as:

- trust in the qualifications and confidence in their underpinning standards and processes (Young 2002);
- widespread understanding and fluent use of the ‘language’ of learning represented by an NQF, and the cultures of learning or employment that may be implicit in this language;
an alignment of the ‘intrinsic logic’ of the NQF with the ‘institutional logics’ of education and the labour market (Raffe 2009); in other words the rationale which underpins the design and implementation of the NQF should correspond to the ways in which educational institutions, employers and others actually use and value qualifications;

and finally, political acceptability. Qualifications, and consequently an NQF, must meet and reconcile the demands and expectations of powerful stakeholders - including those who are powerful because their decisions give the qualifications value.

This has at least two immediate implications for the implementation of an NQF. First, the design of a framework and the placement of qualifications within it may be the product of pragmatic compromises between social and political pressures on the one hand and more technical considerations on the other. This may result in anomalies, such as the placement of apprenticeships of varying levels of difficulty at the same level of the framework (Collins et al. 2009), or the placement of higher education (HE) and non-HE qualifications at different levels when this is not clearly merited by differences in their learning outcomes (QFUK 2010). These anomalies tend to occur around levels equivalent to EQF level 5, as this is the usual meeting point of general, vocational and higher education with their respective interests and stakeholders. Some of these anomalies may be smoothed out over time, in the course of reforms of qualifications or revisions to the NQF itself, but this too is a political process, with uncertain outcomes, and it takes time.

Second, there is a fundamental tension between the more or less radical aims of many NQFs, which seek to reform features of their education and training systems and often to achieve social and economic transformation in the process, and their need for a slow and incremental change process which sustains the relationships, mutual practices, shared understandings and trust on which effective qualifications are based. Many of the policy issues in this paper are concerned with ways to resolve or manage these tensions.

**NQFs are multi-purpose tools**

The second feature of NQFs is that they are tools with many possible purposes. These may include: to improve understanding of the education and training system; to increase the coherence and coordination of this system and make it more ‘unified’; to promote parity of esteem for vocational and general learning; to promote access, transfer and progression into, within and between programmes of learning; to provide an instrument of accountability and control; to update and extend standards, and make them more relevant to current needs; to enhance the quality of learning; to promote the recognition and consequently the utilisation of existing skills, including those acquired through non-formal and informal learning; to make education and training more demand-focused, increasing the influence of learners and other users such as...
employers relative to the providers of learning; to promote the international mobility of labour and of learners; and to provide a means for referencing national qualifications to trans-national frameworks such as the EQF.

Purposes vary across frameworks, although most frameworks pursue several (but not all) of those listed above. Guides to policy-makers (e.g. Tuck 2007) usually include the advice to clarify needs and purposes before deciding whether and how to introduce an NQF. This is sound advice but less straightforward than may appear. An NQF has been compared to a Swiss Army Knife: it has a range of uses but it is not necessarily the best instrument for any of them. The challenge is therefore to identify the set of complementary purposes for an NQF which correspond to current national needs and priorities, and to determine whether these purposes are better achieved through an NQF or through alternative means. Many European countries report that their immediate reason for introducing an NQF is in order to reference national qualifications to the over-arching meta-frameworks, the EQF and the Bologna framework for HE (CEDEFOP 2010; NQAI 2010a). This is construed as an imperative of globalisation: qualifications and therefore qualifications frameworks are seen to be important constituents of regional education, labour and capital markets, and countries introduce NQFs in order to avoid the risk of exclusion from these markets. However, Bjørnåvold (2010) suggests that many European countries have introduced frameworks for reasons of national push as well as European pull: they wish to use their NQFs as instruments of national reform as well as to address European and international agendas. Having decided to acquire their multi-purpose tool, they want to exploit its multiple uses.

_NQFs differ_
NQFs are introduced into widely contrasting national contexts, for varying purposes, and consequently differ widely in their own right. They differ in scope: they may cover a single sector of education such as VET or HE, or they may cover all sectors; if the latter, they may impose a uniform structure or allow their “sub-frameworks” to differ. NQFs differ in design features such as tightness, number of levels, dimensions for which descriptors are defined, how fields or types of qualifications are specified, and so on. They differ in their voluntary or regulatory character, and in the guidelines or conditions associated with them. They differ in the ways they are managed and introduced, and in the roles of governments, central agencies, educational institutions and other stakeholders.

Seen in broader terms, we can distinguish different types of framework based on their strategy for change, specifically whether they start from the existing qualifications system or from a proposed future system, and whether the framework is intended to provide a tool for change or to drive change directly. Raffe (2009), drawing on Allais (2007b), has proposed three broad types:

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1 This comparison is made by Jörg Markowitsch of Danube University Krems.
A communication framework is primarily descriptive. It takes the existing system as its starting point and provides a language to make it more transparent and conceptual tools for rationalising it, improving its coherence and developing progression pathways. It is typically loose in design, voluntary and at least partly led by educational institutions. It provides tools for change but it does not try to drive change directly.

A transformational framework takes a proposed future education and training system as its starting point and defines the qualifications it would like to see in this transformed system, without referring explicitly to existing provision. It is typically tighter in design, with stronger central direction, and it tries to drive change directly.

A reforming framework is an intermediate category which combines features of the other two types. Like a communications framework it takes the existing system and its institutions as its starting point. But whereas a communications framework provides a tool to facilitate change driven from elsewhere, a reforming framework has more specific reform objectives of its own - for example, to fill gaps in provision or to make quality standards more consistent. It therefore tends to be statutory, to have tighter requirements and to try to drive change directly as well as to facilitate other change agents.

The Scottish Credit and Qualifications Framework is an example of a communications framework and the Irish National Framework of Qualifications is an example of a reforming framework. Examples of transformational frameworks include the English National Vocational Qualifications and the South African NQF, at least in their early versions. Most European frameworks, according to Pevec Grm and Bjørnåvold (2010, p.7) “are presented as communications frameworks aiming to make education, training and qualifications systems visible and more understandable to different stakeholders..., and to clarify the vertical and horizontal links between different types of qualifications”. However in many countries policy-makers may expect these communications frameworks to evolve by degrees into reforming frameworks.

Transformational frameworks have encountered the greatest difficulties, although the reasons for this are contested. For example, researchers have proposed a wide range of epistemological, institutional and political explanations for the “failure” of the early version of the South African NQF (Allais 2007a; Ensor 2003; French 2009; Mukora 2006; RSA 2002). By contrast, the Scottish framework was identified as one of the “success stories” of framework implementation in Young’s (2005) review, and as the “most successful” of the 16 NQFs recently studied by the International Labour Office (Allais 2010). This has led to a view that communications frameworks like the SCQF are the most successful. However, success needs to be measured in relation to ambition. If communications frameworks are the most successful in achieving their ambitions, this may be because they have the easiest ambitions to achieve (McBride
and Keevy 2010; Raffe 2011a). Moreover, the ILO study did not include the Irish framework, a reforming framework which has as much claim as the SCQF to be considered successful, and is more ambitious (Collins et al. 2009; Granville 2003). Unlike transformational frameworks, communications frameworks and reforming frameworks both start from the existing system; they therefore potentially build on existing relationships and mutual practices and sustain the trust required for an effective qualifications system.

The distinction between the three types of NQF is a valuable heuristic for understanding change strategies, but the actual diversity of NQFs and their impacts on social change is more complex, for at least three reasons described below.

*Most comprehensive NQFs are multi-level entities*

One of the emerging messages from research on NQFs is that their impacts are variable and the processes involved are complex. One reason for this is that NQFs and the contexts within which they are introduced vary widely within as well as between countries. Most comprehensive frameworks embrace sub-frameworks serving different sectors such as VET or HE, or sometimes multiple sub-frameworks for a given sector.

Many of the most successful frameworks have allowed their sub-frameworks to vary, respecting the varying institutional logics of their respective sectors. Conversely, those which have tried to fit a tight model of NQF across diverse sectors - such as New Zealand and South Africa which tried to impose a “unit standard” model on academic and higher education as well as VET - have encountered difficulties (Ensor 2003; Strathdee 2009). Similarly, an over-arching comprehensive framework may differ from the sub-frameworks within it. Typically, the broader the scope of a framework the weaker its transformational impact and the greater its potential as a communications framework. A successful NQF may therefore be a multi-level framework whose objectives and strategies for change vary across sub-frameworks and between sub-frameworks and the over-arching framework. This is a dynamic process; the development of many NQFs involves a shifting emphasis between development within sub-frameworks and integration across them. Scotland’s communications framework was successful, in part, because it incorporated reforming frameworks established over two decades of reforms, most of which developed into sub-frameworks of the over-arching NQF (Raffe 2011a). For many countries an appropriate strategy may start with particular sectors or sub-sectors and let these become established before building up to a comprehensive framework.

*An NQF may involve several possible change processes*

Many policy debates surrounding NQFs, and contributions to these debates from enthusiasts and critics alike, suggest that NQFs aim to achieve impact through a relatively narrow range of processes. In particular, they place learning outcomes at the
heart of the NQF strategy (Young and Allais 2009). Advocates of learning outcomes claim that they represent a new paradigm of learner-centred education with the capacity to transform pedagogy and the culture of learning, make qualifications transparent and empower learners and users of qualifications relative to the providers (Adam 2008; CEDEFOP 2009). When NQF reforms are seen to have failed, or to be taking a long time to show results, this is often attributed to the incomplete or slow adoption of a learning outcomes approach or the refusal of educationists to adopt it at all (Bouder and Kirsch 2007; NQAI 2010b; Sursock and Smidt 2010).

However, learning outcomes play a relatively small role in many NQFs. They may form a useful part of the architecture of the framework, and in particular they provide a reference or translation device for allowing frameworks to bridge curricular, sectoral and national boundaries, but they are not themselves the driving force of educational change. A majority of NQFs, at least within Europe, are “outcomes-referenced” frameworks in this sense. They have encountered fewer problems of implementation, and appear to have had more successful impacts, than “outcomes-led” frameworks in which learning outcomes play a more central role (Raffe 2011b).

There is a wide range of potential mechanisms or change processes by which an NQF may try to achieve its objectives. These may include:
- a common “language” of levels, award types, credits, and so on which provides conceptual tools for planning and coordinating learning and underpins the transparency and coherence of the education system;
- stakeholder engagement and coordination - which may be stimulated by the very process of establishing an NQF;
- regulation - which may specify conditions for qualifications to be included in the framework;
- quality assurance systems linked to the framework, whether or not tied to regulation;
- unitisation, that is, breaking programmes or qualifications into modules or units of learning which can be combined and accumulated flexibly and used for credit transfer and progression;
- making individual qualifications more transparent, thereby facilitating progression, making it easier to relate qualifications to labour-market needs and increasing the power of consumers in the training market; and
- cultural and pedagogical change, for example in favour of more learner-centred approaches.

Among European frameworks the early emphasis appears to have been on a common language, stakeholder engagement, quality assurance and (sometimes) regulation.

The evidence does not enable us to distinguish clearly between effective and ineffective change processes, but the last two processes in this list - making individual qualifications more transparent and cultural change - have shown less signs of impact
so far. It may be significant that these two items are those which are most closely associated with a learning outcomes approach.

An NQF is not the only policy instrument
Most of the national objectives of NQFs could be achieved through alternative policy measures; whether they are more effectively achieved through an NQF or through these alternatives may depend largely on national circumstances. And for many countries, especially those with weak educational institutions, few resources and little expertise, an NQF (except of the most rudimentary kind) is likely to be a poor investment. It may have negative as well as positive effects, for example by adding to the cost and complexity of education and training, by disrupting existing relationships or good practice, or simply by diverting resources and policy attention away from more productive reforms.

Conversely NQFs, or at least the more successful ones, are not introduced in isolation. They are usually developed alongside other policy measures, often as part of a wide-ranging reform programme. This may include measures which focus on the education system: reforms of curricula and pedagogies, enhancements to teacher education and development, institutional restructuring, extended quality assurance, and so on. It may include changes in the way this system is governed and in its relationships with employers and other stakeholders. And it may include changes in the wider environment which affect the ways that qualifications are used and valued: for example, changes in public-sector recruitment policies, in occupational licensing or entitlements to the recognition of prior learning.

This need for “policy breadth” – for NQFs to be complemented by other measures to ensure their use and maximise their impact – is a theme of the policy literature, and it is supported by the evidence on the impacts of NQFs (e.g. Allais 2010; Collins et al. 2009; Gallacher et al. 2005). An effective NQF, as argued above, requires that its intrinsic logic is aligned with the institutional logics of the contexts in which it is embedded; other measures may be required to change these institutional logics. However, this further adds to the difficulty of reaching conclusions about the impacts of NQFs, especially on a cross-national basis. To the extent that the effectiveness of an NQF depends on complementary policies, and the nature of those policies varies according to national needs and circumstances, then it becomes very difficult to generalise about the effectiveness of NQFs simply by observing their impacts across different countries. Each NQF is likely to be a component of a distinctive policy programme with a particular mixture of measures. This reinforces the case, argued at the beginning of this paper, for a policy learning approach which respects the unique circumstances of each country.
**Concluding comment**

A study of the international experience of NQFs can offer several things to Slovenia or to other countries thinking of introducing one. It can supply a language and conceptual frameworks for identifying alternative possibilities in framework development and implementation, and it can suggest factors to consider in choosing among these alternatives. It can identify some of the processes that may be involved in implementing an NQF and in its subsequent operation, and the practical issues that these may raise. It can similarly identify features of the national environment - the education and training system and its demographic, economic, social and political context - which may shape or constrain these processes. And as the experience of NQFs accumulates it can increasingly indicate approaches which are more or less likely to be effective for particular purposes and in particular contexts, subjects to the difficulties of generalisation discussed above.

There are two things which the international experience cannot offer. It cannot - or should not - provide models of best practice for policy borrowing. It can provide evidence and ideas to support processes of deliberation and decision that are specific to each country, but it cannot cut short these processes by providing a ready-made solution. And although it can inform a country’s consideration of how to design and implement an NQF, it may have less to say about the decision to introduce one in the first place. The complexities of NQFs, and the slow processes of their diffusion and impact, mean that it will be a long time (if ever) before we can draw up the final balance sheet for NQFs and decide whether the global rush to acquire them has justified the resources, the policy attention and the opportunity costs that have been incurred. By the time we know the answer, it may be too late.

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