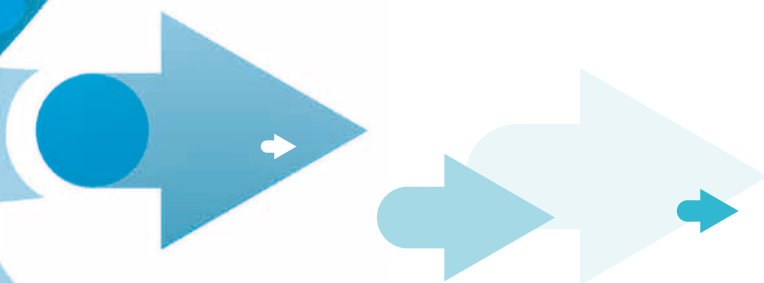


REFERENCING NATIONAL QUALIFICATIONS LEVELS TO THE **EQF**



European Qualifications Framework Series: **Note 3**

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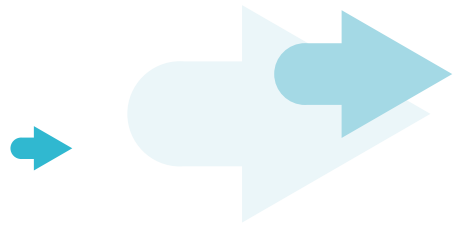
REFERENCING NATIONAL QUALIFICATIONS LEVELS TO THE **EQF**



European Qualifications Framework Series: **Note 3**

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Foreword

This Note is the third in the European Qualification Framework Series that is written for policy makers and experts who are involved at national and European level in the implementation of the EQF.

The Recommendation of the Council and the European Parliament on the establishment of the EQF invites Member States *‘to relate their national qualifications systems to the EQF by referencing their national qualifications levels to the relevant levels of the EQF, and where appropriate, developing national qualifications frameworks in accordance with national legislation and practise.’*

The success of the EQF will depend on the transparency of these national referencing processes and their results, and the trust these generate among stakeholders inside and outside the country. Therefore, it is critically important to share common principles in the referencing processes, and at the same time, to understand the rationale of various methodologies and possible interpretations of the common criteria.

The particular purpose of this Note is to support discussions and decisions on the process and methodologies of referencing national qualifications levels to the levels of the EQF and on the presentation of the results of this referencing process. The considerations included in this Note are based on the debates in the EQF Advisory Group and National Coordination Points on the 10 Referencing criteria and experiences of countries that have presented their referencing reports until today. It is probable that the Note will need to be further elaborated as information on forthcoming referencing processes becomes available.

1 Introduction

The success of the EQF as a tool for transparency and mobility depends on the ways countries reference their national qualifications systems to the EQF level descriptors. High levels of trust in the EQF and realistic understandings of qualifications systems will come from open and rigorous referencing processes that truly reflect the position of national stakeholders as well as the position of national qualifications systems. Trust and good understanding will also depend on good communication of the outcome of the referencing process inside and outside the country. Referencing processes that are hard to understand or disguise problematic areas or are based on weak engagement of stakeholders will destroy trust in the EQF as a translation device. The referencing process is therefore critically important and this Note is intended to facilitate national and international exchanges that will lead to improvements to the process.

What is referencing to the EQF?

Referencing is a process that results in the establishment of a relationship between the levels of the European meta-framework (EQF) and the national qualifications framework (NQF) or system. Through this process, national authorities responsible for

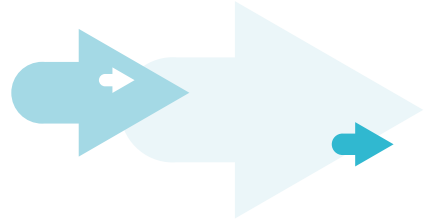
qualifications systems, in cooperation with stakeholders responsible for developing and using qualifications, define the correspondence between the national qualifications system and the eight levels of EQF.

Mutual trust in referencing outcomes

Mutual trust is an expression that is often underlined as the objective of the referencing process. It is sometimes assumed to originate from the technical reliability of standards and procedures. However, it can also be assumed to arise from a consensus amongst stakeholders and the way in which that consensus is rooted in custom and practice.

The objective information currently available about the match between EQF descriptors and national system is only partial. Many European qualifications systems are progressively moving towards the learning outcomes based approach which is the basis of the EQF descriptors. Consequently the consensus of stakeholders in charge of qualifications, certification processes but also those using qualifications (employers, learners) is crucial for the credibility of the referencing process.

In summary, there are various determining factors that have an impact on



the referencing processes of national systems to the EQF. The referencing process hence needs to embrace both objectivity and consensus as elements of trust.

The basis of this Note

This Note has been written on the basis of the experience of the first countries to complete the referencing process⁽¹⁾ (France, Ireland, Malta and United Kingdom⁽²⁾). It is also based on discussions in the EQF Advisory Group, peer learning activities of the Learning Outcomes Group⁽³⁾ (and the former Peer Learning Cluster on recognition of learning outcomes) and exchanges in seminars involving EQF National Coordination Points and their international observers.

The Note aims to support national decisions and international exchanges on the referencing process. It provides advice based on experiences of other countries, it gives sources of information, clarifies some concepts related to the EQF referencing and outlines answers to common questions. It also proposes certain issues to be considered when carrying out the referencing. This Note does not aim at prescribing any processes or methods for the referencing process beyond the ten referencing criteria adopted by the EQF Advisory Group (see chapter 4). It acknowledges that the countries that are currently carrying out their own referencing processes will develop their own fit-for-purpose procedures that will inform future editions of this Note.

The role of this Note is also to underline the benefits the referencing process can have for the national qualifications systems being referenced. So far the referencing has proven to be helpful to those countries that have experienced the process. It has made it easier for the stakeholders involved to examine the national qualifications systems from the point of view of an outsider. This perspective has, in some cases, revealed some issues. As a consequence of this some countries have undertaken new action to improve their national system. For example the French report points out:

‘Although it was often very difficult to draw a line between the work linked to referencing and that to be carried out to create a new list (NQF), the analyses made concerning the national descriptors and their comparison with the EQF descriptors led to reflections and critical analyses at a national level (that are not mentioned in the referencing report), but will be taken into account to ensure that the descriptors of the future French NQF are as coherent and transparent as possible as compared with the descriptors in the European framework.’

The audience for this Note is members of national EQF steering groups, National Coordination Points and national policy advisers in the field of education, training and qualifications and stakeholders involved in the national referencing process.

(1) The referencing reports of these countries are available on the web-site of the European Commission, DG EAC: http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm

(2) The referencing of the United Kingdom encompasses the referencing of three qualifications frameworks: England and Northern Ireland, Scotland and Wales.

(3) This group is technically a sub-group to the EQF Advisory Group.

2 The EQF project

The EQF is designed to make it possible to compare qualifications' levels in national qualifications systems in Europe. These national systems are always complex and are generally difficult to understand by people who wish to work or study in countries other than their own. The same is true for business sectors and international companies that wish to treat the EU countries as a single labour market and a homogeneous territory for investment.

The EQF is also a policy about lifelong learning, and lifelong recognition. Thanks to the capacity of the EQF to capture all kinds and levels of qualifications regardless of where learning has taken place, the EQF is able to support active lifelong learning policies. It can encourage lifelong learning by increasing the transparency of qualifications systems and, through national qualifications frameworks, showing the potential (vertical and horizontal) links between qualifications. This is increasingly necessary in situations where peoples' trajectories (employment, learning or personal) are often subject to change and where access to professions, programmes or status requires proof of prior achievement.

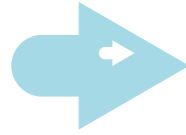
The EQF is furthermore an inclusive framework of qualification levels that has functions that reflect and influence national priorities. These functions are, for example:

- the use of learning outcomes;
- the need for open processes of quality assurance;
- the facilitation of validation of non formal and informal learning;
- the development of NQFs and of credit transfer systems.

European frameworks and national frameworks

The key attribute of the EQF is its meta-framework status. It exists as a high level and generalised communication tool that can allow comparison of one national qualification system to another without, in principle, making demands on the national systems. It does not and cannot concern, ways in which countries structure and prioritise their education and training policies, structures and institutions.

National qualifications systems are rather stable structures that have grown from stakeholder interests built up over many years. The EQF is proving to be a catalyst for change in these systems and some countries have begun to use the referencing process as a vehicle to



organise reform. A good example is the development of explicit national qualifications frameworks that will soon become a feature of the qualifications landscape in all Member States. But the principle remains – the EQF is based on different principles and functions than

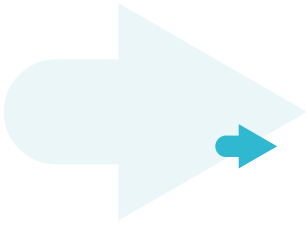
National Qualifications systems and frameworks. These differences in principles create a particular challenge to those who manage the referencing process. The differences between the two types of frameworks – the NQF and the EQF are clarified in the table 1 below.

Table 1: Comparing national qualifications levels and levels in the EQF

Differences between the types of framework	National qualifications levels	EQF levels
Main function:	To act as a benchmark for the level, possibly volume and type of learning.	To act as a benchmark for the level of any learning recognised in a qualification or defined in an NQF.
Developed by:	Regional bodies, national agencies and sectoral bodies.	EU Member States acting jointly.
Sensitive to:	Local, regional and national priorities (e.g. levels of literacy, labour market needs).	Collective priorities across countries (e.g. globalisation of trade).
Recognises learning of individuals by:	Assessment/evaluation, validation and certification.	[Does not directly recognise learning of individuals].
Currency/value depends on:	Factors within national context.	The level of trust between international users.
Quality is guaranteed by:	The practices of national bodies and learning institutions.	National practices and the robustness of the process linking national and EQF levels.
Levels are defined by reference to:	National benchmarks which are embedded in different specific learning contexts, e.g. school education, work or higher education.	General progression in learning across all contexts across all countries.

Source: Bjornavold, Jens and Coles, Mike (2008).⁽⁴⁾

(4) Bjornavold, Jens and Coles, Mike (2008) 'Governing education and training; the case of qualifications frameworks', *European Journal of vocational training*, n°42-43, CEDEFOP.



Qualifications are not referenced to the EQF

There are no qualifications directly referenced to the EQF and there is no process envisaged to make this a possibility. Only national qualifications levels⁽⁵⁾ are formally linked to the EQF through the referencing process. For any specific qualification, the national qualification system is the only concrete point of reference. In other words a concrete qualification will be described by an EQF level only because the qualification has an agreed level in the national system and it is the system that has been referenced to the EQF. If the formal link between the qualification and a national system (such as being in a national register) is missing, there is currently no procedure for linking the qualification to the EQF. However, the objective of the EQF is to link as many qualifications as possible, be these awarded by private or public, national or sectoral bodies. The only agreed way of doing this is through the national systems and frameworks, for reasons of trust and credibility.

There are many qualifications that exist outside national systems, for example those awarded by professional bodies for business sectors or those awarded by international companies or certificates awarded by the volunteering organisations. As said above, there is currently no mechanism for describing the EQF level of these qualifications other than through national qualifications systems. At European level, work is being carried out to develop criteria that will guide the owners of qualifications that exist outside national systems towards gaining recognition in the EQF through national systems.

These considerations on what is EQF and how it operates show that the EQF referencing is a serious challenge, as it attempts to establish a link between qualifications levels related to real qualifications in countries and the rather abstract generalisation that is the EQF.

(5) That contain officially recognised qualifications that may be awarded when the learner has acquired the learning outcomes regardless whether the learning has taken place in formal, non-formal or informal settings.

3 The EQF recommendation and expectations of Member States

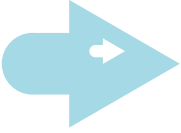
The implementation of the EQF and what it entails for tasks for countries that cooperate in European education policy is formalised in the Recommendation of the European Parliament and the Council⁽⁶⁾ (EQF Recommendation).

This Recommendation defines the basis of the EQF and recommends a certain number of actions to each country which voluntarily decides to implement EQF (see Box 1).

Box 1: Actions to be carried out by countries implementing EQF

- 1. Use the European Qualifications Framework as a reference tool to compare the qualification levels of the different qualifications systems and to promote both lifelong learning and equal opportunities in the knowledge-based society, as well as the further integration of the European labour market, while respecting the rich diversity of national education systems;*
- 2. Relate their national qualifications systems to the European Qualifications Framework by 2010, in particular by referencing, in a transparent manner, their qualification levels to the EQF levels, and, where appropriate, by developing national qualifications frameworks in accordance with national legislation and practice;*
- 3. Adopt measures, as appropriate, so that, by 2012, all new qualification certificates, diplomas and ‘Europass’ documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate European Qualifications Framework level;*
- 4. Use an approach based on learning outcomes when defining and describing qualifications, and promote the validation of non-formal and informal learning in accordance with the common European principles agreed in the Council conclusions of 28 May 2004, paying particular attention to those citizens most likely to be subject to unemployment or insecure forms of employment, for whom such an approach could help increase participation in lifelong learning and access to the labour market;*

(6) European Parliament and the Council (2008) Recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning in *Official Journal of the European Union* 2008/C 111/01.



5. *Promote and apply the European principles of quality assurance in education and training when relating higher education and vocational education and training qualifications within national qualifications systems to the European Qualifications Framework;*

6. *Designate national coordination points linked to the particular structures and requirements of the Member States, in order to support and, in conjunction with other relevant national authorities, guide the relationship between national qualifications systems and the European Qualifications Framework with a view to promoting the quality and transparency of that relationship. The tasks of those national coordination points should include:*
 - *referencing levels of qualifications within national qualifications systems to the European Qualifications Framework levels;*

 - *ensuring that a transparent methodology is used to reference national qualifications levels to the European Qualifications Framework in order to facilitate comparisons between them on the one hand, and ensuring that the resulting decisions are published on the other;*

 - *providing access to information and guidance to stakeholders on how national qualifications relate to the European Qualifications Framework through national qualifications systems;*

 - *promoting the participation of all relevant stakeholders including, in accordance with national legislation and practice, higher education and vocational education and training institutions, social partners, sectors and experts on the comparison and use of qualifications at the European level.*

Source: EQF Recommendation.

All countries are engaged in practical matters to achieve outcomes for these points. The objective of the

Note is to share experience and plans for referencing national qualifications systems to the EQF.

4 Accommodating diversity of qualifications systems

A country's qualification system when viewed from the outside invariably appears to be a complex mix of different stakeholders' responsibilities, varied governance arrangements, multiple institutions (each with its own role and responsibility), and sub systems which can be linked to others or almost separate from others. Indeed some people challenge the use of the word system as qualifications systems can appear to be barely systematic. Even within countries it is not unusual for citizens to express a lack of understanding of parts of the national qualifications system.

The diversity in the forms of national qualifications systems reflects the fact that qualifications are deeply embedded in national and regional economies, society and cultures. Sometimes qualifications represent much more than just achievement in learning but also remuneration level, personal status and social position.

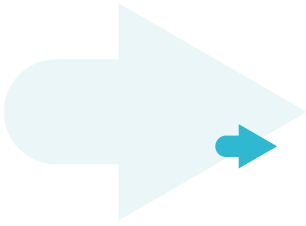
The EQF Recommendation advises that referencing to the EQF of a national system is best achieved through a national qualifications framework (NQF). The referencing process is made easier with an NQF as the NQF levels embrace many qualifications and several sub-systems. With an NQF in place,

national referencing can be achieved by referencing each NQF level to an EQF level.

When an NQF is developed care is taken to ensure that it reflects the ways qualifications are used and valued in the country⁽⁷⁾. Obviously technical specification of the learning (included in the qualification) is taken into account as are a range of social factors to do with equivalencies between qualifications and how they interface with other national arrangements such as collective bargaining arrangements. In an ideal situation the NQF is a representation of all of these factors and stakeholders feel they can support the NQF classification and its associated functions. The NQF is in fact a simplification of the complex arrangements that underpin it.

Linking the NQF to the EQF levels needs to take account of the unique set of national arrangements embodied in the NQF. Any over-simplification at this stage in the referencing process may undermine stakeholder confidence that the NQF is truly reflected in the proposal for the referencing of the NQF to the EQF. People viewing from the outside of the country, from the perspective of the EQF, need to be confident that the NQF

(7) Bjornavold, Jens and Coles, Mike (2010) *EQF Series 2: Added value of National Qualifications Frameworks in implementing the EQF*. European Commission.



captures as much of the national qualifications system as is possible in a relatively simple tool such as an NQF classification.

The two European meta-frameworks

The EQF exists alongside the meta-framework for higher education (Qualifications Framework for the European Higher Education Area⁽⁸⁾ – QF EHEA). The latter has its own self-certification process for referencing national systems of higher education qualifications. The two meta-frameworks have been developed through two different, but coordinated processes and with

some differences in their objectives⁽⁹⁾, nevertheless each is compatible with the other. Malta has combined the two referencing exercises into a single process. Others, due to timing of developments, have handled the two processes separately. The Irish conference of April 2010⁽¹⁰⁾ on NQFs and overarching European frameworks brought together Bologna experts and those working with the EQF. The conclusion of the conference included a number of statements (see Box 2) that underline the need for coordinated activities in relation to the two European frameworks and the centrality of NQFs in achieving this.

Box 2: Abstract from conclusions of the Dublin (April 2010) conference on NQFs and overarching European frameworks

For qualifications frameworks to realise their full potential, there is a need for greater cohesion. To achieve this, opportunities should be harnessed to bring together the communities involved in national qualifications frameworks (for vocational education and training (VET), higher education (HE) or lifelong learning), sectoral qualifications and recognition. Ultimately, we are all trying to achieve the same objectives, but in different ways: we want individuals to have their learning recognised and be able to move with that learning between education and training sectors and between countries. The multiplicity of ways we are going about this, both at a European and a national level, whilst in itself desirable, requires effective communication and measures to address any difficulties and confusions that arise.

Coherence between the two meta-frameworks should be ensured at national level, including through coordinated self-certifications. Individual states and the relevant authorities have a prerogative to decide the manner of implementing the Qualifications Framework for the European Higher Education Area ('Bologna Framework') and associated reforms and European Qualifications Framework for Lifelong Learning (EQF-LLL). It is imperative, however, if frameworks are to have any effect, that national frameworks meet national challenges for the development of education and training systems.

Source: Higher Education Authority and National Qualifications Authority of Ireland (2010).

(8) The official website of the Bologna Process: <http://www.ehea.info/article-details.aspx?ArticleId=65>

(9) For discussion on the two meta-frameworks see Cedefop (2010) Linking credit systems and qualifications frameworks; sections two and eight http://www.cedefop.europa.eu/EN/Files/5505_en.pdf

(10) See http://www.nqai.ie/publications_by_topic.html#fi for a report of the conference.

5 The 10 criteria for the referencing process

The EQF Advisory Group (the European level governance body for the EQF set up based on the EQF Recommendation) has discussed the referencing process on many occasions and, through the designation of an expert sub-group, has agreed to a set of ten criteria. These criteria guide the referencing process of participating countries and bring some conformity to it in the interests of mutual trust. The *'Criteria and procedures for the referencing of national qualifications levels to the EQF'*⁽¹¹⁾ were finally adopted by the EQF Advisory Group in March 2009. The criteria were developed on the basis of the criteria and processes used in the self-certification process⁽¹²⁾ for QF EHEA.

The agreed EQF referencing criteria represent a collective international agreement and should not be considered as a scientifically perfect instrument. The debates in the Advisory Group and related sub-groups have clarified understandings of the ten criteria but there was still need for further exchange of views in order to discuss different interpretations and develop a common understanding. With the need for further clarification in mind a sub-group of the EQF Advisory Group took the ten criteria and

amplified them in an attempt to broaden understanding of what each of the criteria requires in a referencing process. This amplified list is reproduced below with further commentary on the application of each criterion.

Experience of the early referencing reports suggests that the ten criteria are very helpful for the referencing process and are the fundamental means of communicating the referencing outcomes. The criteria form the structure of headings for the referencing reports and have been made a core of these reports. The National Coordination Points (NCP)⁽¹³⁾ that have completed the referencing also found the experience of the Bologna self-certification process helpful.

It should be noted that the implementation of the EQF, including the referencing process, is ongoing and European and national decisions need to be reconsidered regularly based on past experiences. Therefore, the elaboration of the referencing criteria and the review of referencing reports should be considered a natural and necessary part of EQF implementation.

(11) http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/criteria_en.pdf

(12) These criteria and processes are described in the report of the Bologna Working Group on Qualifications Frameworks (2005).

(13) The role of NCPs is defined in the EQF Recommendation – see Box 1 point 6.

The 10 referencing criteria

Criterion 1. The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process, including the National Coordination Point, are clearly determined and published by the competent public authorities.

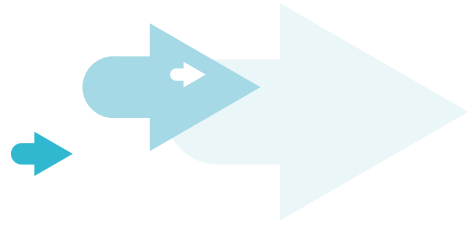
When it comes to national qualifications systems, different countries have different institutional structures. In the referencing process, it is necessary to take into account all of the bodies that have a legitimate role in the referencing process and to clarify (for international readers) their roles. Bodies with these types of functions are generally considered as having such legitimate role:

- those responsible for governing the processes through which nationally recognised qualifications are designed and awarded;
- those in charge of quality assurance in relation to design and award of nationally recognised qualifications;
- those managing and maintaining a qualifications framework (if in existence);
- representatives of institutions awarding qualifications; and
- representatives of those using qualifications (employers, learners).

Some bodies such as ministries of education offer political leadership, other designated agencies may be responsible for managing the process. Other bodies may have an advisory and consultative role and will bring in a range of stakeholder perspectives to the discussions.

As presented in Box 1 countries implementing the EQF are invited to designate NCPs that will coordinate the referencing process. The NCPs can take many forms – the evidence available to date suggests that NCPs are mainly based in ministries of education or government supported qualifications agencies. However, these two types of organisation are not the single relevant bodies for the referencing process. If this position were adopted it would miss the opportunity of widening the involvement of other stakeholder groups in referencing such as social partners, bodies representing business sectors with high levels of mobility of employees, learning providers and learners themselves. For this reason the word relevant in the criterion should be seen as an opportunity to broaden the ownership of the referencing process even if the responsibility for national qualifications remains firmly with a single ministry. The information on stakeholders in chapter 6 may be helpful here.

The list of NCPs as of 2011 is presented in Annex 1.



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

Some would consider this to be the key criterion for the referencing process. For a *clear and demonstrable link* to be established there needs to be an understanding of EQF levels and NQF levels and how they relate. When this understanding is established the procedure for matching levels needs to be described: this procedure should be robust and transparent, probably including a careful application of a ‘best-fit’ process. The matching procedure and ‘best-fit’ concept are discussed in more detail later in this Note (see chapter 7) – here it is important to appreciate what defines a qualification framework level.

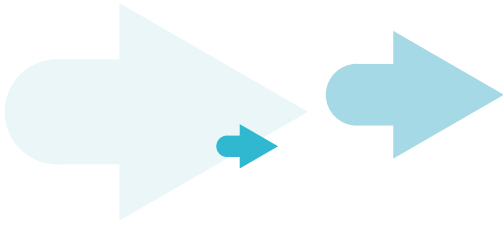
The EQF levels need to be appreciated as a generalised model of learning that may in some circumstances appear to be limited – for example the EQF level descriptors do not make reference to personal qualities or key competences. To gain a good understanding of each level it is necessary to appreciate that a level is probably more than the sum of the three parts that make it up (knowledge, skills and competence). An appreciation of level comes from reading across the

descriptors. This creates a narrative with meaning – for example – *this is the knowledge (facts, principles and concepts) that can be used with these skills (cognitive and practical) in this kind of context (indicating levels of autonomy and responsibility).*

EQF levels are also in a hierarchy where the content of one level is assumed to include the content of lower levels. Each level descriptor therefore describes the new demands for that particular level of learning.

In some circumstances, for example when NQF levels include qualifications from different educational sectors, it may be helpful to refer to the criteria defining these different qualifications in the process of linking levels to the EQF. This will make the understanding of the EQF-NQF links more meaningful to a wider range of stakeholders who might appreciate qualifications’ descriptors more readily than new and possibly general NQF level descriptors.

Having established a clear and demonstrable link from each national level to an EQF level, it is important that this link is explained to a wide audience of interested parties – all assumptions and approximations should be made clear. In demonstrating the link between the levels referencing reports might usefully contain examples of qualifications that make the link clearer to national and international readers of the report.



Some more specific guidance on developing this ‘demonstrable link’ follows in chapter 7 of this Note.

Criterion 3. The national framework or qualifications system and its qualifications are based on the principle and objective of learning outcomes and linked to arrangements for validation of non-formal and informal learning and, where these exist, to credit systems.

Developing qualifications based on learning outcomes (rather than inputs only) is a goal of many ongoing reforms in European countries. All the European level tools for supporting mobility and transparency of qualifications and learning achievements encourage and depend on the use of learning outcomes. However, the road to widespread use of learning outcomes is long and varies considerably between different parts of education and training. This means the countries, sectors and institutions that are in transition from learning inputs to using learning outcomes will be referencing to the EQF using national benchmarks or standards that are not yet explicit in terms of learning outcomes. In some cases they will be using benchmarks (level descriptors) based on learning outcomes but without these being fully implemented at the level of qualifications. These countries will therefore need to develop trust by explaining these implicit standards carefully to users outside the country. The condi-

tions that need to be met in terms of standards and quality assurance will need to be included in referencing reports so that they reassure others that the country is moving towards a generalised use of learning outcomes.

Whilst we are lacking a generalised method for identifying and defining learning outcomes, several interesting approaches have been developed and tested, showing how stepwise identification and definition of learning outcomes is possible. This is explained more fully in the forthcoming EQF Note on learning outcomes⁽¹⁴⁾.

Some countries have national systems for the validation of non-formal and informal learning and some have national credit systems. The functions of systems for the validation of non formal and informal learning and the ways credit systems work need to be made explicit in the referencing report as they are important for opening up qualifications systems to international users. Of particular importance is to explain the ways validation processes and credit systems are dependent on the NQF for making them operational.

⁽¹⁴⁾ European Commission (forthcoming) *EQF Note on the Use of Learning Outcomes* (provisional title) expected to be published in 2011.

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

Qualifications are the most meaningful part of qualifications systems for citizens. The ascribing of specific qualifications to an NQF level brings meaning to the NQF level and, through the referencing process, to the EQF level. It is therefore important that the way a qualification is located at a level is described in full and examples are provided of the rules governing the process. There is also an opportunity to include in the referencing report two or three examples of qualifications and the evidence used for giving them a national level.

Quality assurance systems have to cover an NQF (see the next referencing criterion). For example the NQF can be used as a ‘gateway’ for approved (quality assured) qualifications. Phrases such as ‘this qualification is *in* the framework’ arise from this quality assurance function. Entry to such frameworks is governed by criteria and transparency of the referencing process is enhanced if such criteria are included in referencing reports. For example the types of expectations of qualifications could be summarised.

In many countries national registers or catalogues are in use. International enquiries about qualifications are likely to use these databases, especially if they are available through a web site. The databases usually include definitions of all officially recognised qualifications and it is common for each one to be ascribed an NQF level⁽¹⁵⁾. The criteria used to determine this level should be made explicit in EQF referencing reports so that users of the database feel they are gaining information on a transparent and coordinated system of qualifications.

Criterion 5. The national quality assurance system(s) for education and training refer(s) to the national qualifications framework or system and are consistent with the relevant European principles and guidelines (as indicated in annex 3 of the Recommendation).

The success of the referencing process, and the mutual trust it generates, is closely linked to criterion 5 that addresses quality assurance (and to criterion 6 which is discussed below). Referencing reports need to demonstrate the links between national quality assurance systems⁽¹⁶⁾, NQFs and the overarching European agreements in this field, including a statement from the relevant quality assurance bodies that they agree with the documentation provided in the referencing process. If quality

(15) Although these registers can exist without an NQF and vice versa.

(16) Particularly important here is the ways quality assurance procedures influence the design and award of qualifications. These procedures are powerful influences on trust and confidence in qualifications in the country and will have the same strong effect outside the country if they are explained clearly. For example, procedures that define the content of qualifications, the nature of curricula, assessment practices, awarding procedures, certification requirements.

assurance agencies have been involved in preparing the NQF and the proposal for referencing, or if they have given official (and positive) statements during the process, the statement could convey this information and guarantee that this criterion has been fulfilled. If such an agreement were to be missing from a referencing report it would seriously undermine the credibility of the referencing.

Annex III of the Recommendation provides some guidance as regards how to present a country's quality assurance arrangements – with a particular attention to certification processes. However, it is clear from the existing referencing reports that presenting quality assurance processes for international readers is a challenging task. There are several reasons for this such as the fact that much quality assurance is based on implicit agreements and processes and are therefore difficult to describe formally. A second reason is that there is sometimes no single body with responsibility for all quality assurance – several bodies that manage the process over a specific sector or a subsystem often carry out this function. A third reason is that documentation is usually a diverse corpus of texts with little obvious linkage between them. In some cases, the quality assurance practices are closely linked to regular procedures and pointing them out separately requires a lot of information explaining the whole system. Each of the

current referencing reports has included a summary of quality assurance procedures on each sub sector of education and training (schools, universities, training institutions). The countries that have already referenced their qualifications systems confirm that the referencing process is an opportunity to bring coherence to quality assurance arrangements – this is possible because all of the main quality assurance bodies have been involved in referencing.

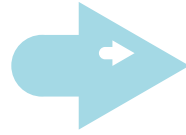
As qualifications systems are evolving towards more focus on learning outcomes, quality assurance systems are also moving towards making sure that expected learning outcomes are met when a qualification is awarded. Many quality assurance systems were traditionally based on ensuring the quality of inputs (teachers' qualification, teaching methods, etc.) but processes directed at outcomes are progressively being introduced (though some countries have a strong tradition of ensuring the quality of certification)⁽¹⁷⁾.

Annex III covers quality assurance arrangements for higher education and VET in the context of the EQF. The criteria on Annex III are consistent with the European Quality Assurance Reference Framework⁽¹⁸⁾ (EQARF) for VET and the European Standards and Guidance⁽¹⁹⁾ (ESG) for higher education. These criteria assert inter alia that quality assurance should be an integral part of the internal management of education and training institutions and that

(17) For a discussion of different approaches to ensure the quality of certification processes in a sample of nine European countries see Cedefop (2009) *The relationship between quality assurance and VET certification in EU Member States*. http://www.cedefop.europa.eu/EN/Files/5196_en.pdf

(18) European Quality Assurance Reference Framework for VET. Summary: http://europa.eu/legislation_summaries/education_training_youth/lifelong_learning/c11108_en.htm

(19) ENQA (2005).



they be regularly evaluated, as should the agencies that carry out quality assurance. These quality assurance procedures should include reference to context, input, process and output dimensions, while giving particular emphasis to outputs and learning outcomes.

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

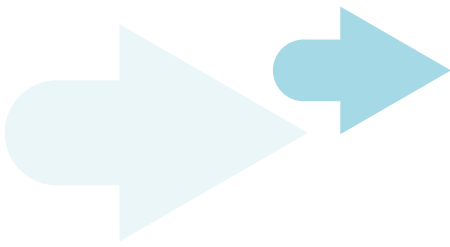
As stated earlier, experience from the first group of countries to produce a referencing report indicates that the referencing process has been particularly effective in bringing together all of the bodies that have a role in quality assurance of qualifications. These bodies often operate independently and confine their influence to one particular educational sector.

The main focus of quality assurance is different in countries and sectors – some qualifications systems pay most attention to the quality of teaching and training and others pay most attention to independent assessment of learning. It should be noted that historically, in most countries, quality assurance procedures have mainly covered provision of learning and since learning outcomes is a relatively new approach to defining learning, they may be less prominent in current quality assurance arrangements. However there is a clear tendency to increase the

use of learning outcomes. In the first set of referencing reports it is possible to identify the following range of quality assurance bodies as being important to the referencing process:

- Government ministries, particularly the education and labour ministries;
- Qualifications bodies, particularly those with national oversight of the system or of the major sectors (schools, higher education and VET) but also those bodies that assess learning, issue awards and certificates;
- Independent quality assurance bodies such as those that set standards for learning in schools, higher education and VET and those that evaluate institutions;
- Bodies that set occupational and educational standards in a country or employment/education sector;
- Bodies that manage the development and implementation of NQFs, especially the NQFs that regulate standards in sectors and nationally; and
- Bodies that disburse public funds to learning institutions and require compliance with quality criteria.

The referencing process is intended to engage stakeholders and quality assurance bodies are a key stakeholder in the qualification process. In addition to playing a part in the referencing process these bodies are required to agree on the report that is produced. In particular they are required to agree the level to level referencing and the way the quality assurance system in the country is



described. This includes the laws, regulations, procedures and any points of discussion for improvements. This is what is meant by the phrase *stated agreement* used in the criterion 6.

In some countries the responsibility for quality assurance process is mainly located at provider level and this means that many institutions can be considered responsible for quality assurance. The coordination here lies with the ministry of education or a body established by government for this purpose.

Criterion 7. The referencing process shall involve international experts.

The EQF is intended to improve international understanding of qualifications. Consequently the referencing process should clarify the relationship between the EQF and the national qualifications systems for a person without particular understanding of the qualifications system concerned. International experts have a role in making sure that this expectation is met. They also have a role with regard to ensuring the quality of the EQF referencing process by witnessing that the process of gathering evidence and consultation have taken place and that all the criteria are addressed in the report.

In order to ensure the sufficient breadth of insight as well as ensuring good communication with people who do not have the native language,

experts with different qualifications expertise (i.e. higher education, vocational education and training, initial education) should be appointed as international experts. National authorities may look to the EQF Advisory Group or the European EQF projects to identify relevant experts.

International experts do not need to be involved in the detail of the referencing process – the national authorities need to decide at which phase of referencing they wish to involve international experts. The international experts are only intended to provide an external point of view helping the preparation of the referencing report so that those who are not familiar with the countries qualifications system may understand the referencing and have trust in its outcomes. This is discussed in more detail in chapter 7 of this Note.

The role played by the experts in the referencing process should be clearly explained in the report and their viewpoints must be clearly visible.

Criterion 8. The competent national body or bodies shall certify the referencing of the national framework or system with the EQF. One comprehensive report, setting out the referencing and the evidence supporting it shall be published by the competent national bodies, including the National Coordination Point, and shall address separately each of the criteria.

The aim of this criterion is to ensure that countries cover the entire range of qualifications levels (and types) in their framework or system, thus reflecting the overarching, lifelong learning character of the EQF. However the EQF does not insist that countries link all qualifications (through the NQF or the national system) to the EQF at the same time. The criterion 8 expectation of a single report means that whatever the scope of the referencing process⁽²⁰⁾ this should be done in a single report (meaning it was coordinated and agreed by all relevant stakeholders at national level.) This means there is no possibility to submit, say two referencing reports – one referencing report vocational education and training and another one for higher education. However a country might, for the time being, decide to reference only their vocational qualifications framework to the EQF and only include these in the referencing report. Later it may be decided to link other qualifications to the EQF and in this case a new comprehensive report will need to be prepared.

In the case of the UK the single report includes a coordinated response from three regional independent NCPs. The certifying competent body in this case was the UK's national government in collaboration with the governments in the separate UK countries.

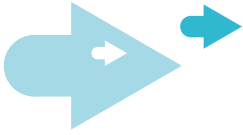
NQFs are still under development in most European countries and in some cases the first version of an NQF is being referenced to the EQF in the full knowledge that a second referencing report will be needed when a new version of the NQF is accepted and implemented in the future.

The centrality of the set of ten criteria in the referencing report is underlined in this criterion. A response to each criterion needs to be included.

Criterion 9. The official EQF platform shall maintain a public listing of member states that have confirmed that they have completed the referencing process, including links to completed referencing reports.

Countries should indicate the links to their main qualifications web portals that will carry the link to the referencing report. Links to national qualifications frameworks (and any associated guidance) should also be included as this will help people from outside the country to access information.

(20)
By scope of the referencing process is understood the range of qualifications covered by the national system or NQF that is referenced to the EQF.



An EQF portal is being developed by the European Commission based on advice from the EQF Advisory Group. The main aim of the EQF portal is to present the results of the referencing process. Based on information provided in the referencing reports, the portal will enable citizens to understand how NQF levels relate to EQF levels, and to compare how the NQF levels of different countries relate to a certain EQF level. The EQF portal will also provide references to relevant national portals and the full referencing report.

qualifications. For this added value to be clear to all users, all qualifications in NQFs need to be associated with an EQF level. How to actually provide the reference to the EQF level in individual qualifications, taking into account national attitudes and needs, is being discussed within the EQF Advisory Group⁽²¹⁾.

Criterion 10. Following the referencing process, and in line with the timelines set in the Recommendation, all new qualification certificates, diplomas and Europass documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate European Qualifications Framework level.

Indicating an EQF level on a certificate would help stakeholders to judge the level of a national qualifications and facilitate comparison of qualifications from different systems (for example in case of mobile workers).

Criterion 10 might be considered a second stage in the referencing process. Once the level-to-level agreements are in place and qualifications are linked, through NQFs, to the EQF levels then the EQF can be seen as adding international currency to national

(21) Providing the reference in Europass documents is being discussed also by National Europass Centres, the Diploma Supplement Bureau and the national authorities responsible for the Certificate and the Diploma Supplement.

6 The referencing methodology: some essentials

Experience from the first countries to complete the EQF referencing process is useful for the countries currently engaged in referencing. In this section the experience of those who have completed the process is used to identify some factors to consider. It is expected that this section will be further expanded as more referencing reports are becoming available.

Referencing involves linking national qualifications levels to the EQF levels

The functions (mobility of persons, transparency of qualifications) of the EQF depend on an international agreement on eight levels of learning outcomes (knowledge, skills, competences). This agreement is built on consensus amongst European experts and need not be anchored in specific national experience of levels of learning. On the other hand national qualifications levels in NQFs are likely to be built on concrete experience of assessing levels of learning. These national levels may be defined in different ways when compared to the EQF levels. They may also differ in number. For this reason, the national levels (which are much more concrete than the EQF levels) are therefore best understood as the starting point

in the referencing process. If the EQF descriptors are taken as the starting point the level-to-level relationship may be more difficult to establish because the EQF descriptors are necessarily general and therefore open to different interpretations. NQF descriptors are likely to be more specific and less prone to divergent interpretation.

Using the 10 referencing criteria

The basis of the referencing process is the challenge of meeting the requirements of the ten criteria outlined in chapter 5 above. The criteria have provided a structure for the process of referencing and for the report of the process. The fact that the criteria were developed as an agreement during meetings of the EQF Advisory Group provides them with the authority to function in this way. In chapter 5 of this Note the criteria have been explained based on current interpretation of their scope and meaning, it is likely that this mutual understanding will further develop as more countries engage with the referencing process.

The existing experience points to the importance of explaining in full (in each referencing report) how each criterion

is addressed in the referencing process. The most questions from international audience (and therefore uncertainty) have arisen when the detailed response to a criterion is not available in the referencing report.

Use of international experts

Involving international experts in the referencing process is designed to help generate confidence and mutual trust in a country's referencing outcome by the international community. Criterion 7 suggests that international experts add value to the referencing process. This could be done by, for example, offering advice on the transparency of the process, external benchmarks for levels and communicating the outcomes of referencing to an international audience. The decision about how to best use international experts is for the host country to decide.

Experience so far suggests that two or three international experts can be used effectively. This provides an opportunity to link with neighbouring countries and countries with very different qualifications systems and to gain insights into the EQF implementation process in these countries.

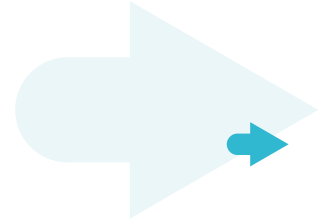
An immediate choice facing NCPs is whether to select an expert who understands the national system or one that does not. Obviously there are management issues if an expert is selected who does not know the national system (as documents will

need to be prepared to explain the national system) or if the expert in question is not aware of difficult local issues and therefore not in a position to compare the referencing with the situation in her/his country. An expert from a close or neighbouring system is an obvious solution but then there is the risk of missing important issues that unfamiliar people reading the report might raise. There are clear advantages from use of at least one expert with deep knowledge of a qualifications system that is not at all similar to that in the system being referenced. Such external points of view obliges those in charge of the referencing process to be explicit about issues they would possibly not have considered as potentially important for the international audience.

A related issue concerns the language capabilities of experts – the use of experts who are not familiar with the language of the country will necessitate additional support in translation and possibly an induction process. These language issues should not be seen as a barrier to involving the experts likely to make the final report understandable across a range of countries.

It would be useful if countries undertaking the referencing process could indicate their reasons and motivation for inviting experts from certain countries.

A question also arises about the depth and timing of the involvement of experts. In some countries the plan is



to bring in the experts towards the end of the process to act as a check on the procedures and outcomes. In other countries they have been involved from the start of the process so that they can become familiar with the national system.

In some countries the experts are simply treated as part of the steering process just as other national experts are. However some countries have reserved a position in the referencing reports for the international experts to act as evaluators and to make a statement of support or otherwise for what has been agreed as the referencing outcome.

Feedback from the international experts that have already supported the referencing process suggests it is a demanding role. They underlined the usefulness of a specific briefing document that helps them understand the qualification system and the intentions for the referencing process. Meeting the main national stakeholders in a referencing meeting was also considered important. The experts also found that the fact that the countries concerned in referencing were already using learning outcomes made it easier for them to contribute to the referencing process.

The usefulness of an NQF

The EQF Recommendation suggests that an NQF is useful for referencing a national qualifications system to the EQF. So far, the countries that have

produced referencing reports have been those with existing qualifications frameworks. They were able to start the referencing process on the basis of these NQFs⁽²²⁾. The regular Cedefop survey⁽²³⁾ of 31 countries suggests that the remaining countries are making progress towards a national qualifications framework and that the stages of development are very different. Clearly, in many such instances, the development of the NQF is seen by countries as a precursor to the referencing process and the referencing process is necessarily slow whilst NQF development proceeds.

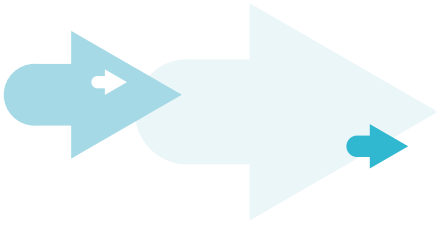
The concurrent development of NQFs with the referencing process is potentially problematic. There is a certain risk that the two very distinct processes – NQF design and implementation and EQF referencing – will be confused. Both processes require high levels of communication, documentation and consultation and this can lead to overloading key stakeholder groups with information and requests. The conclusion of NCP leaders and international experts (attending a seminar on referencing) was that NCPs and NQF designers needed to take care to maintain a distinction between NQF development (which can be a huge undertaking) and the EQF referencing process. The clarity of each process was considered crucially important⁽²⁴⁾.

Exchanges in the EQF Advisory Group and in expert seminars have suggested that in some countries the different levels of learning that people can

(22) Although in the case of France the framework being referenced was a long-standing one from 1969 that is currently being revised.

(23) Cedefop (2010) *The Development of National Qualifications Frameworks in Europe*. <http://www.cedefop.europa.eu/EN/publications/16666.aspx>

(24) The existence of a long standing framework, and a provisional referencing to the EQF pending the acceptance of a new NQF (e.g. France) is also potentially confusing for those outside the country – the coexistence of two NQFs can also be confusing (e.g. the NQF and QCF in England, Wales and Northern Ireland). All such situations need to be properly explained in the referencing report.



have at the end of compulsory schooling can be difficult to define and therefore difficult to reference to the EQF levels. In fact the development of NQFs can help to distinguish between the levels of learning outcomes that are associated with the end of compulsory schooling and this may make the referencing of these school-leaving levels of qualification easier to link to the EQF.

There are now several published resources to support countries implementing NQFs including the following:

- Development of the national qualifications frameworks in Europe⁽²⁵⁾;
- The EQF Series and namely the note on *Added value of National qualifications Frameworks in Implementing the EQF*⁽²⁶⁾;
- Publications of the International Labour Organisation namely the *Introductory Guide to National Qualifications Frameworks Conceptual and Practical Issues for Policy Makers*⁽²⁷⁾;
- ETF publications on NQFs⁽²⁸⁾;
- Publications and reports about development and implementation of the QF EHEA⁽²⁹⁾.

Shifting towards use of learning outcomes

The EQF Recommendation reminds us that learning outcomes are helpful for creating transparency and making comparisons between qualifications and qualifications systems. The countries that have already completed the

referencing process have been those with a tradition in using learning outcomes in NQFs and qualifications, and there is evidence⁽³⁰⁾ that all EU, EEA and candidate countries are making progress towards a more substantial use of learning outcomes than exists at present.

The referencing process depends on being able to compare the descriptors of the levels of the national qualifications framework or system with those of the EQF (written as learning outcomes). No national qualifications system could relate to the EQF without such explicit link between levels. However, it is often the case that the learning outcomes approach is implemented in the different educational sectors in different countries to various degrees at the level of individual qualifications, standards, assessment criteria, curricula, etc. This means that the process of describing the referencing may well differ from sector to sector.

For a full discussion of the use of learning outcomes with information on the different settings in which they are used see the forthcoming EQF Series note on *The use of learning outcomes*.

Stakeholder involvement/management

Several of the referencing criteria require explicit and substantial involvement of stakeholders in the national qualifications system.

(25) Cedefop (2010b).

(26) Bjornavold, Jens and Coles, Mike for the European Commission (2010).

(27) Tuck, Ron for ILO (2007).

(28) For example: Coles, Mike for ETF (2006). *ETF (2010) Developing Qualifications Frameworks in EU Partner Countries*.

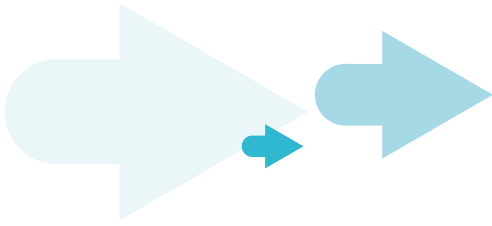
(29) EHEA web-site: <http://www.ehea.info/article-details.aspx?ArticleId=65>

(30) *The Shift to Learning Outcomes. Conceptual, political and practical developments in Europe*. Cedefop. 2008 http://www.cedefop.europa.eu/EN/Files/4079_en.pdf

The countries that have completed the referencing have made it clear that this is a prerequisite for a robust, trusted and longstanding referencing outcome. There have been different ways of involving stakeholders in the

process but the experience so far suggests that the following stakeholder groups have been involved in high-level groups (i.e. groups steering the referencing process or those directly in charge of carrying it out).

-
1. Government ministry(ies) (or designated agency) in the capacity of leading/managing.
 2. Education experts (in various education and training sectors and levels – general education, vocational education and training, higher education, further education and training, etc.) including:
 - Curriculum and Assessment
 - Learning providers/institutions
 - Teachers and trainers
 - Learners
 3. Social partners including:
 - Employers
 - Trade unions
 - Professional bodies
 4. Organisations awarding qualifications (if different from the above types).
 5. A wider range of government bodies responsible if these are for qualifications in their area (for example ministries of youth, agriculture and social security).
 6. Non-governmental organisations including volunteering organisations and charities (in some systems these may be in charge of specific qualifications).
 7. Education and training funding agencies.
 8. Qualifications agencies (if existing).
 9. Quality assurance agencies (or bodies with this role).
 10. Research community (especially international experts and technical consultants).
-



There has also been widespread and open consultation that has enabled other people with an interest in this field to participate. Some of the countries held seminars and conferences that were designed to engage stakeholders in the referencing process and allow an interaction between the various stakeholder groups.

Steps towards a better referencing position

Discussions between NCP leaders and in the EQF Advisory Group have underlined the idea that the referencing process can only capture how the national system relates to the EQF at a given point in time. In other words the referencing reports give a photograph or a snapshot of this relationship. Qualification systems change incrementally and NQFs evolve to reflect these changes and in order to respond to new challenges and expectations. Furthermore, as already outlined at several occasions, EQF implementation and referencing require the use of learning outcomes but in many countries this is progressively being introduced. Full use of learning outcomes at all levels (not only qualifications framework descriptors, but also definition of qualifications and the assessment process) will take time to realise. This may change the links between qualifications and NQFs. Furthermore, NQFs are new in many countries and only as they become more established will all stakeholders fully understand the mechanisms and issues at stake.

This may lead to an evolution in how the NQF is perceived and used in the country that can also impact on the referencing to the EQF.

It may therefore be useful to acknowledge this dynamic and to make it clear to stakeholders that the referencing is a significant first approximation towards relating a national system to the EQF but that further adjustments may be necessary after, say, five years to reflect changes to both the national system and its NQF, the EQF Recommendation (which is to be reviewed in 2013) and as a result of the referencing process in other countries. This appreciation of the referencing process as dynamic should help to focus on the key stable aspects of qualifications systems that need to be related to the EQF.

Some countries have made it clear that the NQF development that they plan will take place in stages. These stages will gradually lead to an NQF that is more and more comprehensive to become a more powerful tool for transparency and coherence in the qualifications system.

Possible methods/techniques for referencing

There is no research that provides a proven model for a referencing methodology. The road to a complete EQF referencing is a new one for all countries. However there are some useful indicators of methods that might be used. For example there is a growing

literature on frameworks and levels that is made up of policy documents and research analysis. This literature does not only help in the design of NQFs but it also provides insights into the general understanding of what qualifications levels can mean in different contexts. The EQF testing projects provide a multilingual bibliography of this literature.

In addition to this literature there is a growing base of empirical evidence built on actual practice of referencing (the referencing reports and this Note⁽³¹⁾) and the testing of NQFs that are designed to link to the EQF⁽³²⁾.

The recently developed referencing reports are the obvious source of information about *technical methods* for referencing. Sometimes these are explicit in the reports and sometimes the technical detail is included in background documents. The technical methods include linguistic analysis of descriptor text – looking at whole descriptors and component parts (see Annex 2 example 1). It also involves analysis of the hierarchies and progression paths implied by descriptors. The latter leads to consideration of links with other meta-frameworks (the Framework of Qualifications for the European Area for Higher Education or QF EHEA) and how this is reflected in level-to-level referencing. The descriptors for major national qualifications are also a source of evidence that can be used in a technical matching process.

In addition to the technical method a *social analysis* can be used so that current practice in relation to implicit levels is taken into account: for example, seeking out common understandings of what a specific level of learning represents in terms of a hierarchy of learning, jobs and future opportunities for the learner. In the social analysis approach it is especially important to consider evidence gathered from stakeholders and published literature on the value and status of key qualifications and present this evidence in support of the proposed referencing. Whilst the results of this social analysis might appear more ephemeral than those of a technical process the value added by the social analysis is critically important to trust amongst stakeholders, especially citizens.

All of the referencing reports published so far (as of mid 2010) strongly focus on technical comparison methods. It is to be assumed that future referencing reports will include some that are based on social analysis and that rely for validity on documented stakeholder consensus and an explanation of how qualifications arrangements are rooted in custom and practice. In time, a body of information on the social analysis approach will emerge, but for now there are no sources of empirical information available for this approach.

The essential concept of ‘best-fit’

The procedure for referencing a set of levels in a national qualifications

(31)
This Note will be updated regularly.

(32)
See the Cedefop survey of NQF developments that is updated regularly Cedefop (2010b) *The development of national qualifications frameworks in Europe (August 2010)*. <http://www.cedefop.europa.eu/EN/publications/16666.aspx>
Cedefop (2009b) *The development of national qualifications frameworks in Europe (September 2009)*. <http://www.cedefop.europa.eu/EN/publications/5030.aspx>

system to those in the EQF is likely to be imperfect and require the use of ‘best-fit’. The concept of ‘best-fit’ is not a new one – it is a long-standing mathematical and engineering idea for finding harmony between two sets of data or two or more devices. Its distinguishing feature is the acceptance that perfect fit is probably not possible and some judgement or approximation is necessary to make a link and solve a problem. In the case of matching NQF and EQF level descriptors the concept of ‘best-fit’ requires a common judgement from a range of stakeholders so that there can be confidence in the outcome of the approximation. It is therefore useful to consider ‘best-fit’ as a *decision that is based on collective professional judgements of stakeholders*. This is exemplified in the French referencing report which states⁽³³⁾:

As with all older systems, based on a strong tradition, some qualifications found themselves on the margin, between two levels, but the consensus reached by the stakeholders in the referencing exercise enables the cross-reference to be confirmed.

It may be useful to consider some other terms that use the concept of ‘best-fit’. In some national systems there is a specific alignment of levels in one framework with another – the alignment of the FQEHEA with those of the EQF is an example. It is important to note that when using ‘best-fit’ to link a level in one framework to

one in another framework that the qualifications in these levels are not necessarily rendered equal or equivalent or carry the same value. Qualifications at the same level can vary in the balance of knowledge, skills and competence, the volume of learning, the route to the learning and the opportunities for permeability and progression that are offered.

In the Bologna self-certification process where countries link the levels in higher education qualifications frameworks to the FQEHEA the term *substantial difference* is used in place of ‘best-fit’. The term arises in the Lisbon Recognition Convention⁽³⁴⁾. Whereas ‘best-fit’ requires ‘proof of fit’ the use of substantial difference requires a test to find if the link from level to level is beyond what can be justified or proved, otherwise the link is accepted.

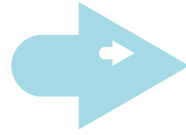
In the Malta peer learning activity on NQFs of October 2009 the thinking of professionals in the engineering industry about ‘best-fit’ was formulated as follows⁽³⁵⁾:

The ‘best-fit’ principle (i.e. the referencing to the level that best matches the qualification) is thought to be a feasible method for classification. Precisely because education and training tracks impart knowledge, skills and competence to varying degrees and therefore qualifications cannot always be characterised unambiguously with one set of descriptors, experts see the ‘best-fit’ principle as a welcome approach to referencing.

(33) The report will be made available on the web-site of the European Commission DG EAC in 2011: http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm

(34) Council of Europe (1997) *Convention on the Recognition of Qualifications concerning Higher Education in the European Region*, Council of Europe available at: <http://conventions.coe.int/Treaty/en/Treaties/Html/165.htm>

(35) Presentation by Sabine Tritscher-Archan of IBW. For more information about the PLA results see the summary report here: <http://www.kslll.net/Documents/Recognition%20of%20learning%20outcomes-Report%20Malta%20PLA.pdf>



These engineering professionals identified another important characteristic of using ‘best-fit’ – namely that of flexibility and tolerance in interpretation:

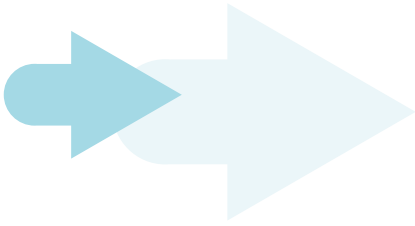
Most of the workshop participants advocated ‘respectable generosity’. Not every word should be seen as ‘written in stone’, descriptions would not necessarily have to match 100 %. The descriptions’ abstract nature is considered necessary – because this is the only way all qualifications can be identified. Greater detail would narrow the scope of interpretation and make it more difficult to apply the descriptors.

NQF descriptors are usually more detailed than those of the EQF and they are normally closely linked to the specific national context, therefore it is unlikely that there will ever be a perfect correlation to the EQF descriptors that are necessarily broader and more general. The Maltese referencing report describes the Malta Qualifications Framework (MQF) as closely aligned to the EQF levels. However, ‘best-fit’ was still required in the referencing of MQF levels to the EQF levels. This is exemplified through a direct comparison of the descriptor text within the national framework to the text in the EQF descriptors (see Annex 2 example 2).

All of the referencing reports to date have been written after a consultation process involving, *inter alia*, surveys and workshops. It can be argued that respondents to these

consultations apply ‘best-fit’ as a natural process of considering the implications of a proposed level-to-level matching – they consider the broad implications of the matching to the qualifications they know well. The evidence from consultations is particularly important. If confidence levels of international users of referencing agreements are to be high, then the evidence from consultations should be included in the published referencing report. The statistics from consultations about the numbers and types of respondents selecting each of these categories is important from an international point of view.

However, a fruitful consultation process requires that those consulted have a good understanding of issues at stake. This is evident in countries that have qualifications frameworks in place for some time, but in many countries NQFs are new instruments and it is not guaranteed that stakeholders fully perceive their implications and operational principles. While the expectations from the EQF are generally high (as shown for example by the national consultations that took place prior to EQF adoption) some pilot projects also show that stakeholders such as employers’ representatives and trade unions do not have sufficient and accessible information about EQF and how it is designed to operate. Explaining the EQF and the referencing process to these parties prior to the consultation exercise is one of the roles of the NCPs.



The process of ‘best-fit’ includes deciding on the weighting given to the technical and social dimensions in the final referencing decision. In the case of the English and Northern Ireland report the social dimension was given a strong weighting in matching level 4 of the national framework to the EQF (see Annex 3 example 3 further explanation).

The need to apply the ‘best-fit’ principle may be most obvious when there are differences in the number of levels in the national framework and the EQF. In such situations, it is impossible to achieve a single level to single level match. This is the case in Scotland (see Annex 2 example 4). The concept of ‘best-fit’ is evident in the existing referencing reports in the process of

comparing different qualifications descriptors to EQF levels. Annex 2 example 5 includes information about using qualification descriptors in the referencing process.

The detail of the methodology for the actual level-to-level referencing (and therefore ‘best-fit’) varies between existing referencing reports. Sometimes the process is described in detail; this enables international readers to appreciate the ‘best-fit’ decisions made. The texts need to make these decisions explicit – this includes description of where the ‘best-fit’ decision differs from what some stakeholders would believe to be perfect fit. Some questions may be useful to guide the description of ‘best-fit’ in referencing reports:

-
- *Is the expression of level descriptors in the NQF suitable for the use of ‘best-fit’? When it comes to, for example, the coverage of knowledge, skills and competence, the use of learning outcomes (written at a useful level of detail).*
 - *Following on from this, what are the main differences in the scope of the NQF level descriptors when compared to those in the EQF? For example are there additional elements such as the description of key competences or aspects of self-management?*
 - *Where does a broad consideration of text in the two sets of descriptors suggest a linkage between the national qualifications framework and the European meta-framework?*
 - *Is there a potential difference between the referencing suggested by technical methodologies (text analysis, weighting of learning outcomes) and the expected referencing based on the opinion of stakeholder groups (such as the social partners)?*
 - *What evidence sources were available to support the decision making about level-to-level referencing?*
 - *Have stakeholder groups endorsed the ‘best-fit’ outcomes? Is the evidence of consultation with stakeholders available?*
 - *Finally is it possible to trust that the final referencing decisions are based on collective professional judgements of stakeholders?*
-

7 Potential issues arising in the referencing process

In each country the referencing process takes a different form as it takes into account the different sectoral and institutional settings that apply. However there are some issues that are common to many countries. These are considered below in the form of a question and answer approach. The questions have been identified by NCPs.

Q. How can we reference to the EQF if learning outcomes are not yet a reality in some sectors of education and training?

A. Learning outcomes can transform standards expected in curricula or qualifications from implicit understandings into explicit understandings. It is sometimes the case that some qualifications are not yet expressed in learning outcomes. In these situations it is essential that stakeholders agree how these qualifications are set at a specific level in an NQF. In other words, how the implicit qualification standards are linked to the explicit NQF standards. The referencing process is only fully effective if NQF levels are expressed as learning outcomes and have been agreed by a wide range of stakeholders. It is, however, expected that over time all qualifications will be expressed as learning outcomes.

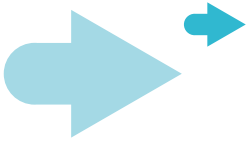
National referencing reports should indicate some planning on this.

Q. The referencing to the EQF is best done via an NQF, should the NQF development take priority and what can be done when an NQF does not cover all qualifications or sectors in a country?

A. The NQF development is the priority. Through the NQF development the EQF referencing process is more easily managed. Some countries have developed NQFs that represent a provisional position and the intention is to expand and deepen the scope and functions of the NQF after a number of years have elapsed. These provisional NQFs should be referenced to the EQF without delay as they will guide the more elaborate and difficult referencing process that is required in sectors with no NQF levels.

Q. How can efficient governance be ensured whilst involving the widest range of stakeholders and opinions in the referencing process?

A. It is probably the case that a combination of top-down (centrally determined structures and proposals) and bottom up (highly consultative, consensus building) is the most effective approach. Whereas a process



dominated by a top down approach may lack in stakeholder engagement a process dominated by a bottom up approach may take a long time and appear, at times, to be lacking in vision. A vision from the policy level is always essential, which may be influenced by stakeholders.

Q. The timescales for implementation of the EQF (2010 and 2012) are clearly not attainable for some countries – what is a realistic deadline for all countries to complete the referencing? This especially refers to countries in which the learning outcomes approach has not yet very developed.

A. The strength of the EQF (and therefore its benefits) depends on the number of countries that have referenced their qualification systems to the EQF levels. Therefore this process should be completed by countries as soon as possible. The main obstacle to referencing is likely to be the time needed to establish learning outcomes (this can take many years) and the need for the development of an NQF (which may take two or three years). Whilst an NQF is not formally required for the referencing process they are very desirable from the point of view of trust and transparency. Countries therefore have to judge the optimum time to spend on these two processes in advance of proposing a defensible referencing of the national system to the EQF.

Q. What is the position if the outcome of referencing is something unexpected and calls into question a long-standing relationship between qualifications and levels in the country?

A. This outcome should be seen in a positive light. Qualifications systems cannot be precisely engineered and the environment in which they operate changes. The referencing outcome could be viewed as a quality check on the coherence of the national system as a whole.

Q. How should a country respond to adverse commentary on a referencing report (process) from the Advisory Group and other Member States?

A. A decision needs to be made about whether adverse commentary is based on weak understanding of the national qualifications system, in which case some better communication materials are needed to convey a more understandable description, or whether the adverse commentary is challenging the national position. In the latter case the country in question should be strongly recommended, for reasons of trust and transparency, to be open to further discussions, possibly with the help of international experts. For example, in the case of the UK referencing reports the response of the EQF Advisory Group included some comments in the first category above and these have been addressed in a second (electronic) version of the referencing report from the UK.

8 Reporting the referencing

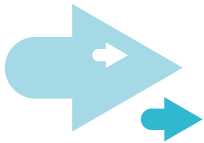
The referencing process involves national stakeholders and could include consultation on the possible outcomes of the process. However the national report reaches a far wider national and international audience and represents a statement of the country's relationship with the EQF and the qualifications systems in other countries. It is therefore a critically important element of the referencing process.

The 10 referencing criteria provide a basis of a structure for the report and have been used in the reports published so far as a spine for reporting. However it is useful to consider some additional elements included in the reports published to date. For example the Maltese report examines the relatively new Maltese Qualifications Framework (MQF) in some depth and uses the referencing report as a tool for dissemination of the MQF and how it relates to both the EQF and the Framework for Qualifications in the European Area of Higher Education. This mechanism for highlighting national policy and instruments is clearly important, the English and Northern Irish reports put emphasis on the new Qualifications and Credit Framework. In the UK reports, there is emphasis on the quality assurance processes that are a strong feature of the qualifications

systems in the countries of the UK. In Ireland emphasis is given to the position of 'benchmark' awards and the ways these fit to the Irish Framework and the EQF.

The international perspective on national referencing reports is as important as the national perspective. As stated earlier the report is a statement of the relationship between the national system and the EQF, and the referencing outcome will be of great interest to professionals who are involved in supporting mobility for learning and for work. The international experts have an important task in ensuring the referencing outcome is clearly communicated to the international audiences and therefore are likely to be engaged in preparing and editing the report.

The first international audience to read the reports and begin dissemination is the EQF Advisory Group. Each report is brought before this group for scrutiny and observations are made. This process is clearly important and it is beneficial to use it to refine the referencing report so that it becomes even more convincing when read from an international perspective and optimises trust in the national referencing outcome. For example, as stated earlier, the UK as well as Irish



NCPs have decided that their report will be amended from time to time to take into account problems encountered by users with the communication of the referencing outcome. For this reason it is being maintained as an electronic document.

However not all stakeholders (national and international) are interested in all the detail in the referencing reports and the outcome and its implications are of greater interest. It is likely that the EQF portal will be important here.

It is planned that the results of the referencing will be presented in the European EQF portal that will allow citizens to compare different national qualifications levels via the levels of the EQF and to see examples of qualifications at particular levels. The production of a referencing outcome may only involve a small group of 'leaders' of sectoral groups and it is important to consider wider dissemination. This important process is necessary if the added value of the EQF is to be realised.

9 After the referencing – the beginning of the end or the end of the beginning?

The referencing report is simply a snapshot of the national qualifications levels and the EQF at a specific time. There is evidence that NQFs and qualifications are evolving and are adapted to meet new needs. Therefore it will be necessary to review the referencing outcome from time to time, especially in the light of the publishing of the referencing in other countries.

As stated earlier, communications activity is likely to form the basis of most post referencing activity for NCPs. Most countries have made plans to engage with qualifications experts from other countries to ensure a two way exchange of information and understanding of the referencing process, its outcomes and its implications.

It is also the case that the criterion 10 request that national qualifications carry a reference to EQF levels. This is also an area of post referencing activity that might be substantial in some countries.

The development of European tools for quality assurance and credit accumulation and transfer link directly to the EQF levels and the referencing process. These are ongoing projects and their development may affect the results of

the referencing process. Though this impact is likely to be on the way the qualifications system is explained and not so much when it comes to the links between national and European levels, an update of the referencing report may be needed.

In some countries the referencing process has led to increased focus on learning outcomes and the development of NQFs. Their implementation is a long term processes. It is possible that as learning outcomes are being implemented at the level of qualifications and assessment processes it may occur that some qualifications are in fact in another level than originally assigned. While this will not affect the relationship between the NQF and EQF levels as such (it will affect the way a qualification is referenced in the NQF) it may also require an update of the referencing report. Finally, it may become necessary over a longer time period for some countries to create an additional type of qualification or even a new level.

For all of these reasons it is clear that the referencing outcome is not the end of the road but a beginning towards a range of means of bringing deeper understanding to Europe's diverse range of national qualifications systems.

10 Practical points for NCP leaders

In every country the referencing process takes a different shape. Here some general points are listed as an *aide memoire* for those NCP leaders just getting started with the process.

The steering committee

- How will members be identified?
- How will their individual contributions be optimised?
- Who will be the chairman, will they need to be seen as an independent voice or a representative voice?

Managing the process

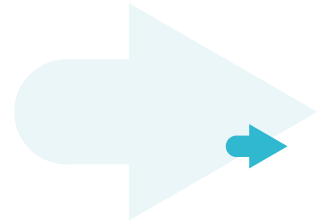
- What will be the managing agency?
- What will be the management structure (who has what responsibility)?
- What will be the timeline for the process?
- What finances will be needed (consultation, experts, gathering and analysing evidence)?
- How will the work on this project tie in with other projects in the qualification system (national and European)?
- Make EQF referencing concurrent with QF EHEA self-certification or not?

Stakeholders

- What are the main stakeholder bodies in the qualifications system?
- How will each body's contributions be optimised?
- What will be their role in managing their own constituencies?
- What is the understanding of the EQF/NQF by stakeholders and does it need to be improved in view of making consultation meaningful?

Making a proposal

- Who will generate the first proposal, an expert? a small group of experts?
- What methodologies will they use?
- How will the social and technical dimensions be married together?
- What role is there for 'best-fit'?
- Will there be reference to existing referencing reports?
- How widely will the first proposal be tested?



International experts

- How many international experts will be used?
- At what stage of the process will they be engaged?
- What are the priorities for their contribution?
- What will be the profile of the experts and reasons for their selection?

Communication

- If the awareness of EQF/NQF issues in the country is low, communication, before consultation, is needed.
- What needs to be communicated (what are the key stakes for the country/different types of actors)?
- How to communicate these issues in an accessible manner?
- What resources are available?

Consulting

- Will the first proposal be the focus of a national consultation or a more limited process?
- What forms will the consultation take (surveys, events, face-to-face meetings)?
- How will the results be analysed and reported?

Decisions on level-to-level referencing

- How will a firm proposal for referencing level to level be made?
- Are there key stakeholders who must be given priority for agreement?
- How will referencing issues be resolved?

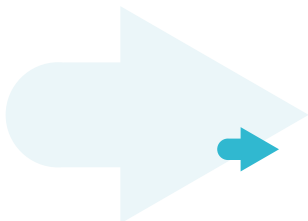
Reporting

- Who will structure the report?
- Who will write it?
- How will it be signed off as a national agreement?
- Who will present it to the EQF AG?
- How will comments be taken into account?

General communications and dissemination

- What events and publications will be needed?
- What web-based information will be made available?
- How will the referencing (and examples of qualifications) be included in the EQF web portal?
- Who will deal with questions?
- What international dissemination is needed?

The first referencing process is a significant first step towards relating a national system to the EQF. However further adjustments may be necessary to reflect changes to qualifications systems, the NQF, the EQF and as a result of the referencing process in other countries. It is important that the referencing process is seen as dynamic rather than a 'once and for all' defining process.



Useful resources for referencing

EQF Recommendation

[http://eur-lex.europa.eu/LexUriServ/
LexUriServ.do?uri=OJ:C:2008:111:0001:0007:EN:PDF](http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:111:0001:0007:EN:PDF)

EQF press release

[http://europa.eu/legislation_summaries/education_training_youth/
vocational_training/c11104_en.htm](http://europa.eu/legislation_summaries/education_training_youth/vocational_training/c11104_en.htm)

Referencing reports published as of December 2010. See References.

EQF Series

Note 1 – Explaining the European Qualifications Framework for Lifelong Learning:

[http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/
brochexp_en.pdf](http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/brochexp_en.pdf)

Note 2 – Added value of National Qualifications Frameworks in implementing the EQF:

http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/note2_en.pdf

Note 4 (forthcoming in 2011) – Use of learning outcomes (provisional title) will be published on the web-site of DG EAC:

http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm

Summary of EQF test projects

Karin Luomi- Messerer: Summary of EQF projects. 2010. (Manuscript) Available on:

http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm

It is in particular worthwhile noting the project: EQF Referencing Process – Exchange of Experience. Summary of national case studies, conclusions and Recommendations:

<http://www.eqf-ref.eu>

Key EQF Advisory Group papers

Accessible on the website of European Commission DG Education and Culture:
European Qualifications Framework [http://ec.europa.eu/education/
lifelong-learning-policy/doc44_en.htm](http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm)

EQF newsletters

Three issues per year.

All available on the DG EAC web-site:
http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm

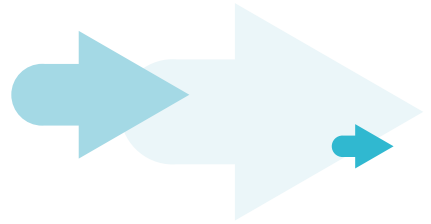
CEDEFOP reports related to the EQF

The selection of Cedefop publications relevant for EQF and NQF implementation
is available here:
<http://www.cedefop.europa.eu/EN/publications.aspx?project=2651>

Annex 1 Information about National Coordination Points

This table presents information about EQF National Coordination Points.

Countries	National Coordination Point
Austria	Österreichischer Austauschdienst (OeAD) – Austrian Agency for International Cooperation in Education and Research
Belgium Flanders	Agentschap voor Kwaliteitszorg in Onderwijs en Vorming (AKOV) Flemish Agency for Quality Assurance
Belgium Wallonia	Service Francophone des Métiers et des Qualifications
Bulgaria	Ministry of Education, Youth and Culture
Croatia	Ministry of Science, Education and Sport
Cyprus	Ministry of Education and Culture
Czech Republic	Národní ústav odborného vzdělávání (NUOV) – National Institute of Technical and Vocational Education
Denmark	Ministry of Science, Technology and Innovation
Estonia	Estonian Qualification Authority
Finland	National Board of Education
France	Commission Nationale de Certification Professionnelle
Germany	Bundesministerium für Bildung und Forschung
Greece	National Organisation for the Certification of Qualifications (NOCQ/EOPP)
Hungary	Ministry of National Resources
Iceland	Ministry of Education, Science and Culture
Ireland	National Qualifications Authority of Ireland (NQAI)
Italy	National Institute for Development of Vocational Training (ISFOL)
Latvia	Academic Information Centre



Countries	National Coordination Point
Lithuania	Methodological Centre for Vocational Education and Training
Luxembourg	Ministère de l'Éducation nationale et de la Formation professionnelle
Malta	Malta Qualifications Council
Netherlands	Ministry of Education, Culture and Science
Norway	Nasjonalt Organ for Kvalitet i Utdanningen (NOKUT) – Norwegian Agency for Quality Assurance in Education
Poland	Bureau for Academic Recognition and International Exchange
Portugal	National Agency for Qualifications
Romania	Executive Unit of National Council for Qualifications and Adults' Vocational Training
Slovakia	Ministry of Education of the Slovak Republic
Slovenia	National Institute for Vocational Education and Training
Sweden	Myndigheten för yrkeshögskolan (YH) – Swedish National Agency for Higher Vocational Education
Spain	Ministry of Education, Social Policy and Sport
Turkey	Vocational Qualifications Authority
United Kingdom	3 NCPs: <ul style="list-style-type: none"> • NCP England and Northern Ireland: Office of Qualifications and Examinations (Ofqual/CCEA) • NCP Scotland: Scottish Credit and Qualifications Frameworks Partnership (SCQF) • NCP Wales: Welsh Assembly Government

Annex 2 Examples of methods used in available referencing reports

Example 1: The Irish textual analysis

A process of direct comparison of the text in the NFQ level indicators and in the EQF level descriptors was undertaken in order to complement other means of establishing correspondences between levels.

The EQF descriptor for knowledge at level 6 refers to advanced knowledge of a field and a critical understanding of theories and principles. Both of these concepts are reflected in the NFQ indicators for level 8, which refer to detailed knowledge, some of it at the current boundaries of the field and to an understanding of the theory, concepts and methods pertaining to a field.

Under 'skill', both frameworks refer explicitly to 'advanced skills' and to the need to 'demonstrate mastery'. EQF refers to the need to demonstrate innovation, whereas NFQ requires the ability to modify advanced skills and tools. The ability to deploy skills in challenging situations is required at these levels in both frameworks: in NFQ, in relation to complex planning, design, technical and/or management functions and in EQF to solve complex and unpredictable problems.

The challenging operating environment is referred to again in the description of the competence outcomes in both frameworks: in NFQ, as variable and unfamiliar learning contexts and in EQF as unpredictable work or study contexts. The role envisaged for the holder of a level 8 award in NFQ is characterised by advanced technical or professional activity; this is closely paralleled by the EQF level 6 reference to managing complex technical or professional activities. The leadership and managerial aspect of this role is specified in NFQ as accepting accountability for all related decision making and in the requirement to lead multiple, complex and heterogeneous groups. Similarly, EQF refers to taking responsibility for decision-making and for managing the professional development of individuals and groups.

The correspondence between the NFQ indicator and the EQF descriptor at these levels in the two frameworks is very strong.



Example 2: The Malta example – Direct comparison of descriptor text

The MQC is based on the 8 levels of the EQF and there is an implicit message in the referencing report that the levels are equivalent and the links only need to be explained rather than justified.

However there are distinct differences in the coverage of each level descriptor in the Maltese framework when compared to that of the EQF. For example at level 2.

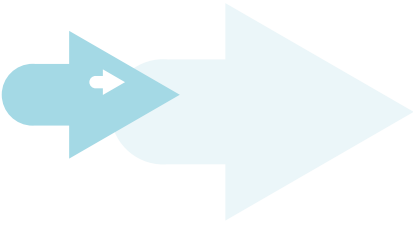
The EQF defines knowledge at Level 2 as basic factual knowledge of a field of work or study. The MQF goes beyond this and considers knowledge in a field of work or study as good knowledge not just basic, and adds the understanding of facts and procedures in the application of basic tasks and instructions. Judgmental skills are used in selecting, using and interpreting knowledge related to the specific assigned tasks. The EQF skills are focused on practical skills in a routine environment and using simple rules and tools, whereas the MQF indicate demonstration of a range of skills in carrying out complex tasks. The MQF also adds the communication of basic information and the judgement that an individual checks that the tasks are carried out effectively. The MQF and the EQF agree that the individual must complete tasks with limited supervision and autonomy at this level. However, the MQF gives judgmental value and adds pro-activity in one's actions. It also includes the learning skills to acquire and apply key competences at this level.

Example 3: Best-fit in England and Northern Ireland

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

In England and Northern Ireland the technical process revealed difficulties and pointed to 'best-fit'.

The findings indicated that QCF Entry 1 and Entry 2 did not map to any of the EQF levels. The descriptors of QCF Entry 3 demonstrated a good match to EQF level 1, and those of QCF levels 1-3 matched to EQF levels 2-4 respectively. The descriptors for QCF level 4 exceeded those of EQF level 4, but without matching to EQF level 5. From QCF level 5 upwards the QCF levels showed a good correspondence with their numerically equivalent EQF levels. The referencing of QCF level 4 was potentially



problematic as, on the basis of the descriptors alone, it exhibited a better match with EQF level 4 rather than EQF level 5. This would suggest referencing both QCF levels 3 and 4 to EQF level 4, when customarily QCF/NQF level 3 represents the upper end of secondary and further education with qualifications above that level being within or parallel to higher education. However it was decided to proceed to consultation on the basis of the relationship supported by the level descriptors rather than that suggested by the workings of the qualification system.

Best-fit sometimes means bringing into play a wider set of evidence

Following consideration of a wider range of factors than those that had been taken into account in the original mapping exercise, the Group decided to adjust the referencing of QCF level 4 to EQF level 5. The consultation responses had indicated that there would be significant negative implications from referencing QCF 4 to EQF 4, primarily concerning consistency between national systems within and beyond the UK; the appropriate valuing of learners' achievements in relation to employment and progression; and the confusion that would result from having a single EQF level spanning a major boundary in the UK qualification system. The main evidence considered in taking these responses into account was:

The level descriptors, which suggest that while QCF level 4 is pitched at a slightly higher level than EQF level 4, it is still closer to EQF level 4 than to EQF level 5.

The actual relationships between qualifications at QCF levels 3, 4 and 5. This suggests that there is a stronger differentiation, perceived and actual, between achievements at QCF levels 3 and 4 than there is between those at QCF levels 4 and 5.

Relationships with the other frameworks in the UK and with the Irish NFQ. Achieving consistency of referencing between the QCF, the SCQF, the CQFW and the NFQ points to QCF level 4 being referenced to EQF level 5. This referencing is also consistent with the relationship between the FHEQ and the framework of qualifications of the European Higher Education Area.

The level of typical qualifications positioned at level 4 in the QCF, which are closer to EQF level 5 than to EQF level 4.

Detailed consideration of both the technical argument based on a comparison of descriptors and the weight of evidence from current UK understandings of qualifications at these levels points clearly to QCF levels 4 and 5 being referenced to EQF level 5.

Example 4: The matching of multiple levels (Scotland)

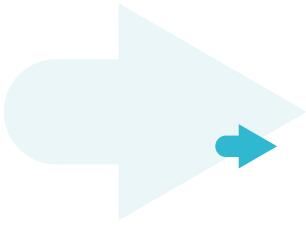
The SCQF has 12 levels; the EQF has 8 levels. In Scotland the difference between the number of levels was resolved using ‘best-fit’.

-
- (a) *There are no grounds for referencing SCQF level 1 to the EQF.*
 - (b) *SCQF level 2 can be referenced to EQF level 1 only in some domains. This partial matching was not typical of other levels. Considering the intention of the SCQF level and the extent to which referencing is not possible, it is agreed that SCQF level 2 should not be referenced to the EQF.*
 - (c) *SCQF levels 3-6 can be confidently referenced to EQF levels 1-4.*
 - (d) *For SCQF level 7, it is difficult to employ ‘best-fit’ on the basis of an analysis of the descriptors alone. However, it is agreed that SCQF level 7 should be referenced to EQF level 5.*
 - (e) *SCQF level 8 can be confidently referenced to EQF level 5.*
 - (f) *While SCQF level 9 is intended to be more demanding than EQF level 5, it may not reference fully to EQF level 6 in terms of the language of the descriptors. It is agreed, however, that SCQF level 9 should be referenced to EQF level 6.*
 - (g) *SCQF level 10 can be confidently referenced to EQF level 6.*

SCQF levels 11 and 12 can be confidently referenced to EQF levels 7 and 8.

Using the principle of ‘best-fit’, SCQF levels can be referenced to EQF levels in terms of aims, descriptors and contents as shown on the right.

SCQF	EQF
12	8
11	7
10	6
9	
8	5
7	
6	4
5	3
4	2
3	1



Example 5: Using qualifications descriptors

An important stage of the referencing work in Wales took the form of an analysis based on as many types of qualification in the CQFW as possible.

Available generic descriptions or descriptors of qualifications in the CQFW were compared with the levels of the EQF as represented both by the level descriptors and by the official links between the EQF and the Dublin Descriptors used in the Bologna Process.

The process of comparing qualification descriptors and EQF level descriptors is subject to some of the difficulties encountered in comparing level descriptors, notably:

- differences in approach;
- conclusions are based on interpretation and inference;
- there is some doubt as to whether what appear to be shared terms actually refer to the same outcomes.

In the process, direct level-to-level comparison is supplemented by three forms of indirect matching:

- comparing a qualification with the EQF descriptors from the levels above and below the target level (this approach is also used in comparing descriptors);
- showing that the level of a qualification comes above, below or between two levels which have previously been matched using direct evidence; and
- using the relationship of the EQF level descriptors to the higher education Dublin Descriptors.

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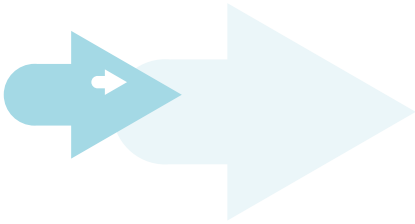
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European Commission

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The European Commission, in close cooperation with European Centre for the Development of Vocational Training and the European Training Foundation, publishes a series of EQF Notes in order to support discussions and activities related to the implementation of the European Qualifications Framework for lifelong learning (EQF) at national and European level.

The Recommendation of the Council and the European Parliament on the establishment of the EQF invites Member States to relate their national qualifications levels to the relevant levels of the EQF. The process, methodology and results of relating national qualification levels to the EQF must be understood and trusted by stakeholders in all countries involved.

EQF Note 3: Referencing National Qualifications Levels to the EQF suggests ideas and advice to policy makers and experts involved in national referencing processes on how this referencing process can be organised and how its results can be presented in a demonstrable, explicit and defensible way. The note is based on discussions in the EQF Advisory Group and experiences from referencing processes up until now and may be further elaborated as information on forthcoming referencing processes becomes available.

