

**Opinion on the Final Draft Report on the Referencing of the MQF to the EQF and Self-Certification to the QF-EHEA.**

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The quality of referencing and self-certification processes are central to the achievement of national and international objectives linked to qualifications frameworks. Quality in this context relies absolutely on both the rigour of the process applied and the accessibility or transparency of the process itself and the resulting findings and their implications.

In 2009 the European Commission published Criteria and Procedures for Referencing National Qualifications Levels to the EQF<sup>1</sup>

‘These criteria aim to ensure that the information and documentation that is put into the public domain is validated by the competent authorities, is relevant, is transparent, can be compared and generates trust. This emphasis reflects that the success of the EQF depends on the ability of the countries to refer their qualifications systems and levels to the EQF in a demonstrable, explicit and defensible way; that means in a way that the information can be judged as valid or not by those not familiar with a country's qualifications’(p.1)

Similarly, published guidelines on Self-Certification to the QF-EHEA<sup>2</sup> emphasise the importance attached to the public scrutiny of process and outcomes.

‘The verification report must be made public so that partners in the Bologna Process are able to see the reasons that lead the competent national authorities to conclude that their framework is compatible with the Bologna framework’ (p.2)

Experience and understanding of referencing and self-certification processes has advanced<sup>3</sup> over the past decade. The role of international experts in these processes has evolved to one of ‘critical friend’ providing an independent peer reflection on the process and outcomes of referencing exercises.

I have not been involved in the development of the MQF or in the referencing process. I have been asked to comment on the draft *Report on the Referencing of the MQF to the EQF and Self-Certification to the QF-EHEA*. My comments relate to the transparency of the process and published outcomes. While my intention is to act as ‘critical friend’ it should be pointed out that my knowledge

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<sup>1</sup> Education and Culture DG (2009) Criteria and Procedures for referencing National Qualifications Levels to the EQF.

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

<sup>2</sup> The Bologna Framework and National Qualifications Frameworks (2008)

[http://www.ehea.info/Uploads/QF/Bologna\\_Framework\\_and\\_Certification\\_revised\\_29\\_02\\_08.pdf](http://www.ehea.info/Uploads/QF/Bologna_Framework_and_Certification_revised_29_02_08.pdf)

<sup>3</sup> European Commission (2013) Referencing National Qualifications Levels to the EQF. European Qualifications Framework Series. Note 5. [https://ec.europa.eu/ploteus/sites/eac-egf/files/EQF%20131119-web\\_0.pdf](https://ec.europa.eu/ploteus/sites/eac-egf/files/EQF%20131119-web_0.pdf)

of the Macedonian qualifications system is confined to the material presented in the draft report itself, consequently my role as international expert is conditioned by my status as 'cultural stranger'.

### **General Remarks**

The Macedonian Qualifications Framework (MQF) has been under development for well over a decade. The history of this development is instructive for an international audience. The early stop-start nature of the initiative and the more recent acceleration in progress demonstrate the dynamic nature of policy development linked to qualifications frameworks and provides an insight into political priorities at different times. It is fair to say that the MQF has been an iterative and incremental innovation within the Macedonian qualifications system.

The objectives of the MQF are extensive and ambitious. They comprehend both enhanced communication and transparency of the national qualifications system and also a range of immediate and longer term reforms. These objectives are set out on p6, p.51, and p.56 and perhaps should be reviewed and consolidated into a single integrated set that would assist the reader.

The level and sub-level structure of the MQF is presented. The rationale and temporary nature of the sub-level structure at MQF levels 5-7 is presented. The concerns and contestations that inspired the sub-level accommodation is hinted at in the report as is the acceptance of the solution.

The education and training landscape in Macedonia is outlined in sufficient detail so as to provide an informed audience with an overview of the relevant sub-systems, policy priorities, regulatory, structural and institutional arrangements that are in place or are planned.

In general, the report is comprehensive and accessible for an international audience. For the most part, sufficient technical detail and information is presented to support broader understanding of the Macedonian qualifications system. At the same time, the complexity and dynamic nature of that system is not avoided or trivialised in the report.

The development of national qualifications frameworks is typically a messy and non-linear experience. It is welcome that referencing reports acknowledge that qualifications frameworks are socially constructed and socially defined. The report suggests that legislation and regulations are significant instruments for qualifications reform in Macedonia. It would be interesting to know more about the social dimension of qualifications in Macedonia and the role of practice and tacit understanding in shaping the reality of qualifications and their relative value.

The EQF- referencing criteria and the QF-EHEA self-certification criteria are addressed in the report. My opinion on the process as reported and the outcomes in response to these criteria are as follows.

#### **Opinion and comment on the EQF Referencing Criteria (Simultaneously Applicable to criteria for Self-Certification to QF-EHEA)**

<b>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.</b>
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The report addresses this criteria satisfactorily.

Institutional arrangements including the National Board for the Macedonian Qualifications Framework (NBMQF) and the Sectoral Qualifications Councils together with relevant legislation

underpinning the MQF, are very recent developments and are as yet untested. Similarly the allocation of MQF related functions to both Ministries, Education and Labour, will play out in the future.

The report could be improved by including further information about the NQF HE and in particular how its governance within the Ministry of Education and Science will interact with the operation of the National Board for the Macedonian Qualifications Framework which is to be the governing agency for the MQF.

**Criterion 2 (EQF)**

**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.**

The report addresses this criteria satisfactorily.

The conceptual basis of the MQF is comparable with that of the EQF. The technical mapping exercise presented in Table 38 on p.76 is convincing and identifies sufficient commonality and correspondence between MQF and EQF levels.

Further information concerning the ‘restructuring’ of five domains that had existed in higher education qualifications architecture into three domains of knowledge, skill and competence of the MQF, would be of interest. The report suggests that this was a relatively painless and even a routine exercise.

**Criterion 3 (EQF)**

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

The report somewhat addresses this criteria.

The MQF is demonstrably based on the principle of learning outcomes. The report does acknowledge that criterion 3 is ‘not fulfilled for the entire qualifications system’ (p.80). It is evident that the learning outcomes approach has been implemented with variable levels of penetration across the subsystems of education and training. Also, statements such as ‘In general secondary education curricula are designed according to educational goals and expected learning outcomes’ (p79) and ‘In higher education, the learning outcomes approach is generalised at level of programme design and accreditation. All accredited study programmes are learning outcomes based in accordance with the decree for the National framework for Higher Education Qualifications’ (p80), cannot be assessed based on the evidence included in the report. Further information on the extent of implementation of the learning outcomes approach across different sub-systems and qualification types would be welcome.

The report, helpfully describes various proposals for ongoing learning outcomes based reforms.

The report includes information on the National system for the validation of non-formal and informal learning. The report includes references to recent legislative provisions aimed at supporting practice. The report does not include information on the quality assurance arrangements surrounding such practice and it would seem from the report that validation is limited to VET qualifications and level 5 on the MQF.

**Criterion 4 (EQF)**

**The procedure for Inclusion of Qualifications in the National Qualifications Framework or for describing the place of the qualifications in the national qualifications system are transparent.**

The report somewhat addresses this criteria.

Certain MQF levelling decisions are determined by legislation. These include qualifications resulting from primary, secondary arts and general education and higher education. Accordingly these decisions are likely to have the advantage of being legitimate but suffer from being less amenable to public scrutiny in a report such as this.

The inclusion process for ‘vocational type’ qualifications appears from the report at least to be under construction. The experimental approach to inclusion developed in collaboration with ETF (outlined on p. 81) appears promising and interested readers would welcome additional detail on the methodology employed to include qualifications in the MQF that are not included on foot of a Decree.

Inclusion of qualifications in the MQF results from legislation in certain cases or otherwise is determined by the National Board for the Macedonian Qualifications Framework (NBMQF). The establishment of Sectoral Qualifications Councils under the auspices of the NBMQF is central to the MQF infrastructure. This quasi-separation of powers will be of interest to the international qualification framework community and its effectiveness will be important most of all to those with an interest in qualifications in Macedonia.

**Criterion 5 (EQF)**

**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 report addresses this criteria satisfactorily.

My only comment here would be to request further information on how the stated independence of the Higher Education Accreditation and Evaluation Board operates independently.

Table 40 – Summary of responses to EQF criteria 3, 4 and 5 is a welcome intervention that recognises the particular inter-connectedness of these criteria.

**Criterion 6 (EQF)**

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

The report addresses this criteria satisfactorily.

**Criterion 7 (EQF)**

**The referencing process shall involve international experts.**

The report addresses this criteria satisfactorily.

It should be highlighted that in advance of the technical referencing process itself, the authorities in Macedonia have had extensive interaction with international bodies and organisations and experts regionally and further afield and have participated in a number of international collaborative projects that all appear to have contributed to the development of the MQF. The MQF, appears to me to be distinctly outward oriented in the interests of graduates from its qualifications system. This is not to say that domestic interests and stakeholders have been neglected, on the contrary, the MQF is characterised by extensive engagement over a long period and with appropriate recognition of domestic and international interests and influences.

The long standing relationship with ETF would seem to have been particularly significant and is likely to have assisted in mediating the effects of regional and international developments on the MQF. The promise of future interaction with the international community and participation in international projects bodes well for the sustainability of the MQF.

**Criterion 8 (EQF)**

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

The report addresses this criteria satisfactorily.

**Criterion 9 (EQF)**

**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.**

The report addresses this criteria satisfactorily.

**Criterion 10 (EQF)**

**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.**

The report addresses this criteria satisfactorily.

While the report addresses practice in relation to the Diploma Supplement, the practice or intention to include the outcomes of the referencing exercise in the Europass Certificate Supplement is not apparent.

The development of the 'register' of HE qualifications and the inclusion of qualifications in the independent 'Inventory' while not required under this criterion are initiatives of some interest to the international community. Because 'registers' or lists of approved qualifications that are part of a national qualifications system are useful to outside 'consumers' of such information for the purpose of recognition of such qualifications, further information about the current state of practice and status of such developments in Macedonia would serve as useful guidance for those with an interest in qualifications originating from Macedonia.

**Concluding Remarks and some ad-hoc comments.**

In my opinion the report demonstrates real progress towards the implementation of a national qualifications framework (NFQ) in Macedonia. Critically the report, while setting out ambitious and longer term policy impacts linked to the MQF including lifelong-learning, employability and quality, the referencing report is presented as a baseline project. This is important as it accepts that the MQF while under consideration for well over a decade has only recently become realised as a result of the technical and conceptual work completed on the MQF itself and the range of legislative, institutional and governance arrangements that have been put in place to support MQF implementation.

The sustainability of the MQF will rely heavily on the capacity of NBMQF and Qualifications Sectoral Councils in particular. Establishing clear lines of responsibility, leadership and co-ordination between these institutions and other bodies and Ministries involved in MQF implementation will be important.

The multiplicity of broader and strategic policy goals to which the MQF has been linked will be challenging, not least in developing appropriate methods for evaluating the policy impact of the MQF over time. The available evidence from other countries seeking to demonstrate causal connections between NQFs and broad policy ambitions is weak. NQF evaluation or impact assessment is a challenge for all of us and the experience in Macedonia will contribute to our understanding of this issue in the future.

In general, the report is accessible to the informed reader including those who may be engaging with the Macedonian qualifications system for the first time. The report appears to have been the product of extensive efforts to engage with relevant stakeholders nationally and internationally.

Where engagement has been less successful, particularly with labour market actors, the authors of the report indicate that ongoing efforts to stimulate interest and participation in the MQF will continue. Given that the skills orientation features strongly in the logic of the MQF these efforts should be supported.

No doubt owing to my own ignorance of the Macedonian system, I was perhaps surprised that an apparent disadvantaged position in terms of progression opportunities that affects certain vocational qualifications did not receive much attention in the report. 'Vocational qualifications...by their nature, in principle do not provide access to vertical progression in the formal education system' (p.66) and also in the case of second cycle professional studies where 'no direct vertical progression route' (p.43) applies. Perhaps it is the case that such practice is unproblematic, it would be useful to know in the context of establishing a NQF.

Overall, on the basis of this report I consider that necessary and sufficient progress has been made to allow for consideration of the referencing and self-certification to EQF and QF-EHEA respectively.

END