

Opinion on the EQF Referencing Report presented by the former Yugoslav Republic of Macedonia (version of 08/01/2016)

Introduction

Education and training, relevant qualifications, and innovation are recognised in the various national strategies as drivers for growth, better employment outcomes and social inclusion. High unemployment (notably youth unemployment) and mismatches (between available qualifications and demand in the labour market) are among the important challenges that the country needs to continue addressing. Synergy between relevant institutions and policies will remain a fundamental factor of success. The National Qualifications Framework (NQF) is one such catalyst for better-articulated dialogue across the qualifications system.

The interactions between NQF implementation and EQF referencing

Different user groups view the NQF as a platform and motivator supporting a renewed approach to reforms of the qualifications system. The NQF brings: i) governance based on systematic cooperation between education and employment stakeholders; ii) harmonised approach across sub-sectors of education and training to develop, describe and manage qualifications; iii) recognised space for diverse forms of learning – including non-formal and informal - in the system and in peoples' lives; iv) recognised centrality of the learning outcomes approach.

The NQF for LLL is young but is, gradually but with certainty, pacing forward. The NQF development process was long and intermediate achievements were at times in a state of lethargy - until end 2012. The reactivation of stakeholders' consultation and dialogue in 2013 and the subsequent adoption of the legal basis for the NQF for LLL (in autumn 2013) were the turn of a new page. But many of most noticeable steps in making the NQF a reality can be associated with the start and acceleration of the EQF referencing process - in the period 2014-2015.

EQF referencing means:

- Consensual recognition of the process as a new and important trigger for action as regards the provision of the NQF legal basis;
- Renewed stakeholders consultation mechanism dealing with new themes, inspired by the key criteria of EQF referencing (2, 3, 4 and 5);
- Systematization in 2014 of existing qualifications and programmes through the Inventory of all qualifications (all sub-sectors / formal and non-formal);
- Start of revision of existing VET (level 4) qualifications by introducing learning outcomes defined through a transparent and participatory approach involving VET and labour market players (completed the pilot phase);
- Start of application of concepts and agreed method for leveling of qualifications (VET), focusing on learning outcomes
- Some synergy with other ongoing NQF support projects, notably those dealing with design of methodological basis for description of qualifications and inclusion in the NQF;
- Launch of the NQF website, used initially as the database of documentation and information relevant for the EQF referencing report;
- Update of parts of the Inventory of qualifications in 2015 and its publication on the NQF website as the first model of a unified qualifications database / information system open for the public.

The discussions and consultations, in wider and smaller groups, organized for the EQF referencing process contributed much to better understanding of the content and requirements of the NQF legal basis, the role and meaning of the level descriptors, the new interpretation given to "qualification", the complementarities for LLL between qualifications of formal and of non-formal contexts.

Comments on critical aspects of the current definition of level descriptors were expressed, and the leading Ministry is aware of these issues. One of such issues concerns the definition of sub-levels: the official position is that sub-levels are indispensable for the time being, as means to ascertain stakeholders' acceptance of the NQF structure. Sub-levels could be

interpreted as a solution for a period of transition. This also means that reflection on the post-transition NQF structure and revised level descriptors needs to be foreseen in the roadmap for further implementation of the NQF.

The numerous discussions on the results of the Inventory of qualifications and on the analysis of a sample of qualifications shed light into the “mysteries” of level descriptors, by making comparisons with learning outcomes of real qualifications and discussing the novelties of the concept of *leveling*.

This systematization and analysis of qualifications (Inventory) shows the picture - with details, gaps and problems – and this practical information was used in addressing criteria 3 and 4 of EQF Referencing. Later on, in 2016-2017, the Inventory is likely to inspire policy makers and practitioners, to exploit deeper some of the materials and conclusions on critical features of qualifications – when the three large projects directed to education and training reforms (2 EU and 1 World Bank) will effectively start their operations.

While the first complete version of the EQF referencing report is the output of an intensive 20-months process, involving efforts and commitment from several institutions, it is also a beginning and from many points of view, a valuable practice.

Key features of the organisation of the referencing process

The European Training Foundation (ETF) provided advice, analysis, capacity building and support to networking and workshops throughout the process. The ETF team reviewed the various drafts of the report, by providing comments and suggestions.

The EQF referencing roadmap was defined and agreed with the stakeholders in a starting workshop (May 2014). In the meantime the multi-stakeholder working group was announced by the Ministry of Education and Science, so that a good degree of synchronization was rapidly in place between national leadership and participation from one side, and the expertise contribution from ETF – from the other.

The Ministry of Education and Science led the entire process and established a core group of four experienced staff members to draft the report. The core group eagerly interacted with the ETF team throughout the almost 2 years process, and actively participated in the many technical and capacity building meetings directly related to the report, as well as in other debates and workshops related with the Inventory of qualifications and the application of learning outcomes – also related with referencing.

From the start of the process, the Inventory of qualifications was part of the approach proposed by ETF. The output of the Inventory is gathered in a simple database, containing synthetic information from a large documentary base, on all currently existing programmes / qualifications in the formal education system, as well as verified adult education programmes. Although initially received with some skepticism by public bodies, it proved to be very valued by all stakeholders later on. Early discomfort was eventually overcome, via discussions in technical workshops, joint review of the findings and in particular, by finding a viable solution to the identified issues – the small pilot initiative to describe VET-4 qualifications in learning outcomes.

The report combines EQF referencing and self-certification (chapter 5 and 6). This unified approach had, from the start, full support by all stakeholders.

Meetings supporting interactions between stakeholders from higher education with those from secondary education (general and VET) turned out very useful, in particular in sharing knowledge and experience on the application of learning outcomes. Unlike other countries, the higher education domain has larger experience as regards the design of programmes / qualifications using learning outcomes, and legislation is enforced in this respect. Secondary VET has enacted in 2013 some new programmes and qualifications based on learning outcomes, but for now these represent only a minority of the awarded qualifications in VET.

One of the concerns discussed from the start regarded the need to improve the frequency of the country's participation in meetings of the AG EQF. This aim was reached at the end of 2014. The international workshop in Skopje (October 2014), with participation of AG EQF members from Austria, Hungary, Montenegro), has contributed to this positive change.

The EQF referencing process faced problems, in particular: i) organizational and capacity; ii) effective involvement of some important stakeholders. The members of the core group did not enjoy specific time allocation to deal with the new tasks and themes: the group coordinated the partial drafts for chapters from the relevant agencies and national experts, organized meetings for reviews and in the last few weeks 2015 focused entirely on the finalization and fine-tuning of the report. In parallel, the effective involvement of some of the members of the officially nominated working group was very weak – in particular the Ministry of Labour and Social Policy, which hardly participated in the many workshops and technical meetings.

Qualifications in the NQF

The text of the NQF is inclusive – provides for insertion of qualifications from primary to higher education, academic and professional, and from non-formal and informal pathways.

The text of the NQF establishes two types of qualifications: i) education level type; ii) vocational type (could also be translated as “occupational” type, to avoid misunderstanding with secondary vocational qualifications). The discussions held during the referencing process with the core group with the aim to better understand the place of each type, and to identify real examples of “vocational type” qualifications showed that more discussion is necessary with stakeholders from the various sub-systems of education and training, notably with the adult education and non-formal learning sector.

At the time of writing the inclusion of qualifications in the NQF followed somewhat different paths / logic of allocation to levels. Summarising:

1. By provision of the NQF Law: all qualifications from formal primary education; secondary arts and general education are automatically allocated to defined levels. (levels 1, 2, 4).
2. By provision of the law on higher education and QF HE: (re)-accredited programmes / qualifications of the three cycles– allocated in the sub-levels / levels as defined in the legal basis. Note: accreditation requires description of programmes / qualifications in learning outcomes.
3. Individual allocation: for qualifications from secondary vocational education (3 levels). Allocation is conditional for qualifications of VET-4 years of education, pending revision and definition in learning outcomes (at level 4). New qualifications (VET-3 years) are described in learning outcomes and can be included.

The inclusion of the new sub-sector (verified non-formal programmes for vocational qualifications – in levels 2 to 4) may require more time for decision. The verification procedure requires that programmes are based on occupational standards, follow a common structure, and are described in learning outcomes. By their features these programmes can fit the type “vocational” (or “occupational”), above-mentioned. This sub-sector knows a visible development since 2012: many new programmes have been developed by chambers and private providers – in response to market demand. The Employment Service Agency is one of the main users (customers) of these programmes – for training and retraining of unemployed / job seekers, funded by the Operational Programme for active labour market policies.

Table 39 is an attempt to summarise and link-up the response to three criteria – 3, 4 and 5. The structure of the table - by level and sub-level – attempts to show how this joined-up response influences decisions on the inclusion of qualifications in the NQF. This approach shows a number of open questions for further analysis and action (in the last column “Inclusion in the MQF”, notably at Level 4).

Key issues:

- Levelling:
 - o Methodological framework for leveling: the already existing handbooks need to be used in practice. This may require parallel work on revision of existing qualifications to make them transparent and comparable for leveling. Existing experience and the handbook for development of qualifications will be instrumental, but wider capacity and expertise will be indispensable.
 - o Risks of bias in leveling decisions need to be addressed early, to avoid overly subjective decisions from sectoral qualifications committees and the tendency to request allocation to higher levels.

- Stakeholders' involvement:
 - o Systematic involvement of the relevant institutions of the employment and labour market domain is currently weak. In the future a sustainable solution is needed, given their role in governance foreseen in the text of the NQF Law.
 - o Trade Unions – in any format – are not represented in the working group, and were not invited to key meetings and debates. Presumably none of the trade unions is informed about the EQF referencing exercise.
- Transparency – as regards Higher Education Accreditation and Evaluation Board (HEAEB)
 - o At the time of writing, despite several requests, it was not possible to have access to a dedicated information platform / website or space of the HEAEB, which is a most important institution for higher education quality assurance, and for the coherent compliance with Criteria 4 and 5. The Referencing Report does mention the status of autonomy of the Board's work and the adopted roadmap to become a full member of ENQA (currently it is an affiliated member). It was not possible to visit / read information on accreditation decisions of the HEAEB.

EQF referencing report

For a pedagogical purpose, the initial outline of the report contained references to Cedefop's analysis of challenges and issues in referencing, presented by EQF referencing criterion. This attention drawn to Cedefop's analysis from the start was reinforced through examples and discussions in the many workshops organized throughout the process. In this respect particular emphasis was given to observed weaknesses in meeting criteria 2, 3, 4 and 5. The core group used the findings and examples of several *EQF Notes* in the referencing process.

The key strengths of this referencing report can be summarized as follows:

- Attention to clarity and transparency: through use of examples and references to legislative texts, use of education data, formats of diplomas and certificates, examples of learning outcomes, examples of self-assessment reports (schools and higher education institutions).
- Clear and coherent description of the education and training system (Chapter 2).
- Detailed description of the process of development of the NQF, with special attention to stakeholders' involvement in the various types of working groups.
- Meeting the referencing criteria (Chapter 5): the report builds on the existing real situation, but in some cases adds elements related to future actions (planned reforms, new institutional development and international projects).
- Attention to Validation of non-formal and informal learning – in a specially dedicated Chapter

The description of the education and training system (Chapter 2), structured by sub-sectors, is valuable for the specific purposes of EQF Referencing, as well as for other aims, including as a baseline picture for the planned work on a new Lifelong Learning strategy. The information is organized in a format consistently used throughout each of the sub-sectors, making the chapter an easy-to-use reference. Reading the chapter is essential to understand the EQF referencing and self-certification chapters (5 and 6).

To the essential question whether the referencing report conveys a real and tangible state-of-play or rather a roadmap for future actions and intentions – often discussed in EQF referencing sessions – our opinion can be summarized as follows:

- The report is based on existing and valid legislation, as well as on selected current practice as demonstrated by the examples – presented and listed in the various chapters, particularly in Chapter 2. The analysis in Chapters 5 and 6 (referencing and self-certification) refers to the relevant headings of Chapter 2.
- The argumentation in Chapter 5 – the EQF referencing criteria – is based on a combination of references to texts of legislation, to results and information from the (independent) Inventory and analysis of qualifications, to practice and to outputs from stakeholder consultation meetings organized during the referencing process.
 - o Under Criterion 3 the report honestly specifies weaknesses as regards the application of learning outcomes in part of the qualifications system.

- Certain incoherencies as regards Criterion 4 are the result of the ongoing debates on the approach to take regarding those qualifications that are not described in learning outcomes (debates concern mainly VET-4). The novelty of the concept of “leveling” within a new paradigm of learning outcomes is in line with the text of the NQF law, but takes time to master in practice within such a short period of time by key stakeholders and decision makers.
- Criterion 5 is addressed in much detail, referring consistently to input-process and output components of the quality assurance frameworks (primary and secondary education, higher education and adult education).
- The report refers to the “Register” of qualifications – uploaded in the NQF website. While this register is a detailed and genuine database of qualifications – based on the Inventory above-mentioned – and is therefore excellent as reliable source of information, it could be questioned whether it can be considered a “Register” with a normative role. As it is, this database was originally conceived for systematization, analysis and research. Further development of the information contained in this database will be necessary to transform it into a Register. Further on the country can benefit of relevant grants (Erasmus+) for design of qualifications database.
- The recent establishment of the NQF Board and election of its chairperson gives new viability to generalize coherent leveling procedures. This is the new door for the future life of the NQF.

The report contains only very sporadic references to links with labour market information and employment policies, which underestimates the importance of these domains as regards the qualifications system and framework. This weakness confirms the above-mentioned limited involvement in EQF referencing of the institutions in charge of employment and labour market policies.

Next steps of NQF implementation need to take account of labour market information, anticipatory studies on demand for skills and results from tracer studies of graduates. Such information is being organized through the new Skills Observatory, under the umbrella of Ministry of Education and Science, but not mentioned in the referencing report.

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