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Directorate-General for Education and Culture

STAKEHOLDER INVOLVEMENT IN NATIONAL QUALIFICATIONS FRAMEWORKS

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1 INTRODUCTION

The fifth Peer Learning Activity (PLA) on the theme of national qualifications frameworks (NQF) organised by the Cluster on Recognition of Learning Outcomes took place on the 22-23 October 2009 in Valletta. The PLA was hosted by the Malta Qualifications Council together with the Malta Chamber of Commerce, Enterprise and Industry. It brought together 45 representatives from 22 countries. Many experts from national administrations came accompanied by employers' or employees' representatives. In addition to national delegates, representatives of the European Commission, Cedefop, the European Training Foundation and external experts to the Commission attended.

This PLA was building on the previous work of the cluster. The PLAs held in the 2007-2009 period¹ all highlighted the necessity for an NQF to be “owned” by a broad range of parties. The Budapest PLA (2007) concluded that²:

The buy-in of different stakeholders and the development of mutual trust (among actors but also countries) in NQF development is one of the challenges to be considered by those designing NQFs.

The PLA held in Niepolmice (2008) already noted the following issues around stakeholders' cooperation in NQF development³:

- The need to engage with a broad range of parties within the education and training system but also outside;
- The fact that time is needed for consultation but also for stakeholders to formulate their positions;
- The motivations of stakeholders to engage in NQF related activities (e.g. referencing their own qualifications to the framework for purposes of financing but also visibility);
- The relationship between qualifications levels and wage structures in certain countries.

The London PLA (2008) developed on the above mentioned aspects and concluded, amongst other things, that⁴:

¹ Reports from previous PLAs can be found on www.kslll.net

² See the report from the Budapest PLA, p.17
(http://www.kslll.net/Documents/PLA_Development%20of%20NQFs_final%20report_Oct.%202007.pdf)

³ See the report from the Niepolmice PLA, p.8-9
(http://www.kslll.net/Documents/PLA_Development%20of%20NQFs_final%20report_June%202008.pdf)

- *The process [of NQF design and implementation] should be open and stakeholders should be able to join at any stage. Not all parties will be interested from the start though it is important that the crucial stakeholders are involved. It is important to maintain the possibility of bringing in stakeholders at a later stage;*
- *The coordinators should remain sensitive to the different interests of parties involved. NQFs raise different expectations from different parties. While a compromise has to be sought it is also important that the interests of all parties are taken on board in one way or another. It is only if the NQF fits the different needs of parties concerned that ownership will be developed;*
- *Neutrality of the organisation (or persons) coordinating the process can be very helpful;*

Finally, the Berlin PLA (2009) examined more closely the involvement and interaction of stakeholders representing the VET sector and those representing the higher education sector in NQF design with regard to their expectations as well as understanding of qualifications.

Against this background, the Maltese PLA was discussing the roles stakeholders play not only in designing NQFs but also in their implementation and the implementation of learning outcomes based approaches in education and training. While the Berlin PLA had a strong focus on developing cooperation between VET and HE through the NQF, the Maltese PLA focused mainly on engagement of labour market representatives (trade unions and employers), education and training providers and also learners.

1.1 PLA Objectives

The PLA explored the benefits of NQFs for different stakeholders (including learners) and the means through which they can be engaged in the NQF process. It also discussed existing national approaches to engaging representatives of the labour market in designing learning outcomes based qualifications, which are a precondition for most existing or developing NQFs.

The discussions during the PLA were stimulated by presentations from participating countries, namely Austria, Bulgaria, Denmark, Finland, France, Germany, Italy, Latvia, Luxembourg, Norway, Portugal, Romania and Turkey. The Maltese hosts presented the Maltese qualifications framework and its specific features as well as the points of view of different actors at several occasions during the event. Furthermore, Cedefop provided inputs based on findings of a survey of NQF developments in the Member States and illustrated how stakeholders were involved in this process.

1.2 Purpose of this report

This report summarises the discussions that took place during the PLA. It is written so as to enable wider audience of those who did not participate in the PLA to benefit from the information exchanged and to create inputs into national and European developments in the area of qualifications frameworks.

⁴ See the report from the London PLA, p.10-12
(http://www.ksill.net/Documents/PLA_Added%20value%20of%20NQFs%20as%20tools%20to%20support%20LLL_final%20report_Oct%2008.pdf)

It is intended that this report be used to support the work of the Commission in disseminating the results of the activities of the RLO Cluster and PLA to Member States and other stakeholders.

2 PLA STRUCTURE AND PROCESS

The PLA took place over two days. Before presenting key points from the PLA discussion according to the main themes, this section briefly presents the proceedings.

Day 1

Day one was opened by a welcome from the Malta Qualifications Council and the Malta Chamber of Commerce, Enterprise and Industry, both highlighting the roles stakeholders have played and are having in the development and implementation of the Maltese Qualifications Framework. The European Commission also welcomed the participants to the PLA underlying that the PLA topic was crucial also for credibility of and trust in NQFs beyond the national borders. The welcome speeches were followed by presentations on how stakeholders are involved in NQFs and underlying reforms in a sample of countries (France, Germany, Italy, Malta). This series of presentations and the consequent discussion were followed by a presentation of Cedefop mapping of NQF developments⁵. The afternoon of the first day was divided into two sessions. The first session was organised in the form of round table discussing the points of view of learners on the benefits of learner-centred approaches to education and training as promoted by the principles of the Malta Qualifications Framework (learning outcomes, recognition of non-formal and informal learning and credit). The last part of the day was dedicated to two parallel workshops both discussing how stakeholders are best involved and at what stages are their inputs to NQF development most relevant. The workshops were stimulated by presentations from Norway, Austria, Denmark, France and Latvia.

Day 2

Most of the second day was dedicated to discussions on forms of involvement of labour market representatives in design of outcomes based qualifications standards. Other forms of their involvement in NQF related processes were also highlighted (e.g. quality assurance or validation of non-formal and informal learning). Experience from Malta and Portugal were presented first, followed by two parallel workshops where additional examples (Bulgaria, Finland, Luxembourg, Romania, Turkey and the ETF experience from Romania and Turkey) were presented and discussed. The second day concluded by rapporteurs' synthesis, some suggestions for future themes and closing remarks by the hosts as well as the European Commission.

Key points from presentations made during the PLA are described later in this report to illustrate arguments being made by concrete examples.

⁵ The full report is available online from the Cedefop web-site:
http://www.cedefop.europa.eu/etv/Information_resources/Bookshop/publication_details.asp?pub_id=562

3 GENERAL CONSIDERATIONS ON STAKEHOLDER INVOLVEMENT

The PLA as well as the Cedefop mapping of the development of NQFs showed that the range of stakeholders concerned by NQF development and implementation is broad and includes:

- Governments (or political authorities) that set out the social and economic policy, vision and strategic purposes of NQFs;
- Different public administrations which regulate, monitor or finance qualifications and related education and training programmes, including ministries, public agencies (qualifications authorities, accreditation bodies etc.), regional and/or local authorities (who often have financing competence but in some countries also the regulatory powers – e.g. Italy, Germany);
- Education and training (public but potentially also private) providers' representatives, universities as well as teachers' representatives – these stakeholders prepare for the achievement of qualifications and in some cases are the awarding organisations;
- Employers' representatives who are interested in improving the quality and relevance of knowledge, skills and competence of their labour force;
- Employees' representatives whose interest is to secure the employment pathways of the labour force by enabling recognition of their knowledge, skills and competence at the appropriate level;
- Learners (and possibly parents) who are the main actors in designing their learning pathways;
- Guidance staff who uses qualifications frameworks and related registers to advice learners;

The above brief overview shows that the interests of these stakeholders in NQF developments are also various including the willingness to:

- Improve the quality and relevance of knowledge, skills and competence credited through the acquisition of qualifications for the labour market but also for the society;
- Enhance the legibility of qualifications systems for purposes of guidance, recruitment, but also funding;
- Ensure the quality of all qualifications receiving public funding;
- Facilitate learners' progression and recognition of their learning outcomes;

These different interests were exemplified in the German presentation during the PLA (see Box 1) and also in the case of Denmark highlighted in the Cedefop presentation during the PLA (see Box 2).

In addition to these motivations, some stakeholders are worried that the existing wage structures would be affected or access criteria for education and training programmes would be directly related to levels of NQFs. Because of this variety of sometimes contrasting positions, discussions around NQF design and implementation are likely to bring up issues that were previously dormant or not explicitly formulated. The process of NQF design is therefore an opportunity for policy makers to develop a dialogue on certain fundamental aspects of qualifications systems, including defining what is a qualification (in their national setting) as opposed to the learning process⁶.

It is inevitable that different stakeholder groups will hold differing views of the value and operation of an NQF. These differences are real and dialogue is critically important for maintaining commitment of all groups to the NQF vision. Therefore the NQF is expected to facilitate exchange and resolve differences in the expectation of stakeholder groups.

Box 1 – Stakeholders interest in the German Qualifications Framework

The **employers'** main interest is to improve the transparency of qualifications and thus to facilitate mobility of the labour force in the labour market. However they wish to maintain the status quo regarding how qualifications are valued in collective agreements or wage structures.

The **employees'** representatives have a stronger reform perspective and wish to achieve equivalence in how qualifications from different qualifications sub-systems are recognised by the labour market but also by the education and training system (e.g. access to higher levels).

The representatives of the **education and training** communities (general education, VET and higher education) have different views on what should be in the level descriptors, how could levels be used for access or exemption and also what qualifications are to be referenced at what levels (for example, initially, the higher education community opposed the inclusion of VET qualifications at levels six, seven and eight but this was a very strong request, even a condition, expressed by the social partners).

The **ministries** are concerned about coordinating the negotiations and reaching consensus but also about ensuring compatibility and relatively simple referencing to the EQF.

Source: Presentation during the PLA by the representative of the Confederation of German Trade Unions

⁶ See for example the Danish presentation during the PLA which showed the segments of the Danish education and training systems that are concerned by the qualifications framework (i.e. which comply with the definition of a qualification) and those that are considered as learning or training and will not be referenced to the framework.

In this context, the Maltese introductory presentation highlighted the following three aspects of stakeholder involvement in NQF design and implementation:

- The cooperation needs to be built on a **permanent relationship** among the parties involved. This should be sustainable and will hence require, at a certain point in time, formalisation of roles of different actors;
- The NQF has an encouragement and **enabling role** for stakeholders to whom it gives the possibilities to play an active role in qualification design and to ensure that the learning provision is adapted to their needs;
- The stakeholder involvement is instrumental in **motivating learners** and raising their aspirations for personal development because it is the stakeholders (employers but also teachers and education and training institutions) who are in everyday contact with the learners.

Box 2 – Needs of different stakeholder groups identified in Denmark (based on Cedefop research)

The Danish response to the Cedefop mapping of NQFs provided the following rationale for different stakeholder groups' interest in NQF developments:

Pupils, students and LL learners - need a comprehensive overview over the system;

Employers and employees - need a framework for judging and comparing qualifications;

Guidance and counselling services - need a comprehensive overview for supporting individuals;

Education and training institutions and authorities - need a framework for guidance and for facilitating recognition of learning outcomes);

Political authorities and institutions – need to describe, develop and evaluate the education, training and qualification system.

Source: Presentation during the PLA by Cedefop

4 FORMS OF STAKEHOLDER INVOLVEMENT

The examples from national experience discussed in the PLA showed different forms and levels of stakeholder involvement which are outlined below. This section only uses examples that were discussed during the PLA even though more aspects of stakeholder involvement can certainly be identified.

Shared governance of the NQF

The French example but also the Maltese example showed how stakeholders are engaged in the strategic management of the NQF. Both of these frameworks are governed by a public organisation, which, though under the auspices of a ministry (education in Malta, employment in France), should ensure that the interests of a variety of actors are represented and considered. That is why, in both countries, these organisations are governed by a board which has mixed membership and where all main interests are represented (see Box 3).

The German presentation also outlined that the governance of the NQF is an issue for discussion and stakeholders' engagement in this process needs to be ensured. So far, in Germany, no decision has been taken with regard to who will be in charge of the framework and its implementation. There is uncertain whether a new and separate organisation is desirable (would this add further layers of bureaucracy?) but also whether the existing structures would generate the necessary buy-in of different parties (including higher education and all the Landers given the decentralised character of education and training in Germany).

Box 3 – NQF governance in France and Malta

The **French** National Commission for Professional Certifications (CNCP) is governed by 43 board members who represent: ministries (16 members⁷), employers' representatives (5 members), employees' representatives (5 members), chambers (3 members), regions (3 members) and other qualified persons who have a consultative role and who represent, for example, organisations with important role in guidance (e.g. National Youth Council), European social partners (ETUC), etc.

The **Malta** Qualifications Council has eight board members who represent the employers' association, trade unions, higher education (the University of Malta), vocational education and training (the Institute of Mechanical Engineering), training (Employment and Training Corporation), policy makers (Ministry of finance, Ministry of education including person in charge of quality and standards).

Source: Presentations during the PLA

⁷ The ministries include those in charge of: general education; vocational education; vocational training; higher education; employment; agriculture; health and social affairs; defence; sport and youth; environment; industry; culture; tourism; infrastructure and transport; SMEs; civil service (source: Arrêté du 6 novembre 2007 portant nomination à la Commission nationale de la certification professionnelle
<http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000283417&dateTexte=>)

Development of qualifications standards

The Italian presentation during the PLA showed that the NQF development includes both top-down and bottom-up processes. The bottom-up process is where the involvement of regional and economic stakeholders became obvious. The top-down process was driven by the ministry of labour and the ministry of education.

Through the bottom-up process regional authorities and representatives of the labour market are engaged in the design of “broadband vocational profiles” which will become the national standards common to the different regional qualifications systems as well as employers’ training. This technical development is accompanied by a political process of negotiation which also involves the different parties concerned. However, in Italy, the passing from the technical bottom-up development to decisions on governance and strategic political aspects of the NQF seems complex given the existing autonomy of different parts of the system (regional authorities regarding VET - they are also setting up regional qualifications systems; autonomy of universities and schools and autonomy of employers in offering training to employees).

Note: The issue of standards will be discussed in further detail in section 6.

Making use of instruments/ infrastructure already developed by the stakeholders

As already noted above, stakeholders are the ones who have direct access to and influence on individual learners and their pathways. For example, in many countries there is already a guidance infrastructure or even several types of guidance infrastructures (e.g. for young people, for unemployed) in place. These are existing networks with “hands-on” experience of learners’ difficulties regarding orientation or progression. They have local or regional presence and often also an information system that can be exploited.

For example the French example showed that the qualifications register (RNCP) which lists all recognised qualifications in the framework is currently being linked to the existing database of training opportunities used for guidance. In this way individuals but also guidance staff will be able to search the qualification database and immediately relate it to the training offer in the region.

Another French example, that of UIMM⁸, who represent employers in the metal industry, also illustrates how stakeholders’ direct contact with interested parties (in this case individual employers) improves the quality of the NQF implementation. This presentation discussed the process through which UIMM designs its qualifications⁹ that can be referenced in the NQF. It highlighted crucial aspects for the quality of this process, such as:

- The identification of a need for a new qualification (or revision of an existing one) which relies on direct contact with employers and the mapping of competence gaps they have to respond to;

⁸ Union of Metal Industry and Crafts

⁹ In the French system the qualifications developed by social partners are called “Certificat de Qualification Professionnelle – CQP” (Professional Qualification Certificate) and these can be registered in the RNCP following a positive statement from the CNCP (based on evaluation against a set of criteria).

- The verification that no existing qualification already serves this need. This involves examination of qualifications designed by UIMM but also those offered by the competent ministries. In other words all new qualifications created have to demonstrate added value compared to the existing qualifications.

Consultation

As identified in the Cedefop report on NQF developments, consultation is the most common means of stakeholder involvement in NQF design. However consultation can take different forms as also illustrated by the PLA presentations. Technical working groups as well written consultation are most common. In addition the following means of consulting stakeholders were highlighted:

- Testing – The draft descriptors of the German qualifications framework are going to be tested (in 2009-2010) on sets of sectoral qualifications with direct involvement of labour market representatives but also of the education and training community (VET as well as HE);
- Research – In Austria sectoral studies have been undertaken to identify whether and how the EQF level descriptors can be used to directly reference Austrian qualifications. These sectoral studies will be used together with experience from transnational work and projects to support the Austrian referencing to the EQF.

However, one challenge that all consultation exercises have to overcome is the need for policy makers to clearly formulate the strategic vision for the NQF and to communicate it to the stakeholders in a way which will raise their interest and engagement in a constructive manner. The topic of NQFs is still new to many parties concerned and it cannot be assumed that they will be already familiar with the related concepts and terminology (especially if these are strongly influenced by the European terminology). The Norwegian presentation during the PLA showed that the fact that the NQF development was lacking clear political vision hindered the stakeholders' participation. While labour market representatives have a clear role in Norway in designing education and training and especially in VET and are important users of qualifications, their interest in the NQF developments was diminished by the fact that this was presented as an instrument for international transparency and mobility only. This point of view can be illustrated by the following citation from the presentation during the PLA:

So far we thought someone wanted to “hang” a level number on the qualifications structure we already have and know. However, if the framework is to become a development tool in a lifelong learning perspective that is a completely other thing.

Only recently did the government formulate a clear statement of the NQF objectives which now enables the social partners to formulate their positions and on this basis seek consensus.

Stakeholders' involvement in referencing qualifications to levels

Though this aspect was not discussed in depth in the PLA as most frameworks that were presented are still in the process of design it was highlighted with regard to:

- The testing of level descriptors' fitness to describe existing qualification (e.g. German, Danish and Austrian presentations);
- Implementation of the NQF (French presentation as well as Irish interventions in the discussion).
- Stakeholders in Malta are contributing to the Referencing Process.

As shown in the Austrian analysis of qualifications in the electrical sector¹⁰ the allocation of qualifications to a level is not an unambiguous exercise. While for some qualifications their level is clear when comparison of the qualification with level descriptors is made, for others the allocation has to be decided based on dialogue as it satisfies some but not all indications expressed in the level descriptors (see for example the discussion about the level of apprenticeship or the level of HTL Ingenieur degree). When such decision is required, in order for it to be accepted and credible it needs to be agreed by those concerned (employers but potentially also higher education and learners).

¹⁰ See Tritscher-Archan, Sabine *The NQF in Practice – By the Example of the Electrical Sector*
http://www.ibw.at/media/ibw/rb_52_tritscher_e.pdf

5 ISSUES AROUND INVOLVING STAKEHOLDERS IN NQF DESIGN

Making sure that the NQF design and the related processes for referring qualifications in the framework are accepted by the stakeholders is crucial for the framework's successful implementation. The German example discussed during the PLA highlighted that the formulation of level descriptors in the draft framework is a result of the social partner involvement and negotiations. As a result the knowledge descriptor was formulated so as to enable description of non-academic knowledge at highest levels (e.g. referring to scientific as well as professional knowledge). This was a condition for trade unions' participation in the NQF development process.

Regarding the referencing process, the French example highlighted the existence of three procedures according to who designed the qualification:

- Qualifications of the ministries competent to design qualifications are registered by right (automatically) because these qualifications are already developed through a consultation process with social partners. This is set in legislation.
- The qualifications developed by social partners follow a simplified procedure. These qualifications do not have to demonstrate certain criteria, namely their relevance for the labour market, because they are designed by the labour market. On the other hand they still have to be evaluated against criteria regarding the quality of how they are designed (how standards are described, what is the assessment, etc.).
- Other qualifications have to be evaluated against criteria regarding both their relevance for the labour market as well as the quality of their design.

The presenter noted that the social partners would like to see their qualifications registered automatically in the framework. However, the fact that when designed they are lacking the involvement of the public sector makes this automatic registration not acceptable to the competent ministries¹¹. That is why a simplified procedure was put in place which represents the difference between qualifications designed by for example private providers and the qualifications from the social partners.

It is most interesting to note that several participants to the PLA highlighted that while the education and training sectors (and especially higher education) tend to want separate frameworks, when social partners are invited to the discussion they are all strongly in favour of a single framework. This was noted by for example Austria, Germany or Belgium (Flemish Community).

¹¹ This is mainly based on issues regarding the quality of qualifications standards and assessment as their formulation and description requires certain technical expertise of qualification design.

Several presentations during the PLA (see for example the Latvian presentation) emphasised that employers representatives' interest in the NQF is closely related to their concerns about improving the quality and relevance of knowledge, skills and competence of the existing and future labour force. Therefore they should be able to see, based on the NQF vision and policy proposal, how the NQF will contribute to this objective and how they can input into the process.

Employees' representatives are also concerned by the quality of qualifications and the fact that this should enhance employability of people holding qualifications. They are also concerned by issues such as improving equity by facilitating access to qualifications through validation and recognition of non-formal and informal learning or by recognising equivalence between higher VET and higher education qualifications (see the German presentation). Again in order to generate their participation proposals for NQFs should make explicit whether and how these issues will be tackled.

Regarding the communication with stakeholders the Maltese example showed the need for explication and description as basis for dialogue. The Maltese qualifications framework aims to develop a common language that will be understood and used by both the education and training community(ies) and the labour market. This includes introduction of concepts that are very new in the Maltese context such as learning outcomes or credit (this was used in higher education but not elsewhere). Also the use of the word qualification in the context of the framework is rather new as the Maltese society was closely attached to the academic diplomas. The definition of concepts and their presentation in a way understandable to the different stakeholders was therefore a crucial step of the NQF development. This took the form of several policy documents on issues such as National Qualifications Frameworks, Quality Assurance, validation of non-formal and informal learning and vocational education and training.

The PLA also discussed whether there were stages of NQF design at which involvement of certain stakeholders was more effective/ needed than at others. However no clear answer can be provided to this issue. It can be observed that while for example in Malta learners' representatives were closely engaged from the beginning of the development in other countries their involvement is being postponed to later stages. Also the discussions at policy level tend to engage the major labour market representatives (confederations and trade unions), while representatives of specific sectors are engaged when specific qualifications are discussed or their referencing to the NQF is being tested. In all cases it was underlined that the engagement of stakeholders in the design of NQFs has to be underpinned by:

- Institutional capacity from the side of public authorities to manage and take part in this dialogue but also enabling sufficient time frame for opinions and positions to be formulated;
- Formalised channels through which stakeholders can engage in the discussion. This may not be in place at the beginning but progressively a partnership should develop and be sustained to replace ad-hoc discussions and consultation;
- The capacity and legitimacy of the stakeholders to defend their positions which should be consulted and adopted in cooperation with their base (members).

6 INVOLVING STAKEHOLDERS IN NQF IMPLEMENTATION AND PARALLEL PROCESSES

A crucial aspect for stakeholder involvement in NQF implementation is the fact that in all systems these stakeholders already have some roles and responsibilities regarding qualifications and/or education and training provision. Furthermore related parallel reforms, such as quality assurance (e.g. employers' engagement in assessment or their approval of programmes in higher education), validation of non-formal and informal learning, design of qualifications standards, etc. are giving them new responsibilities.

The below examples of how stakeholders' interventions are used in implementation of the NQF and related processes were discussed during the PLA.

Design of qualifications standards

Several countries (Bulgaria, Romania, Luxembourg, Turkey, Portugal) participating in the PLA presented their recently set-up approaches to using sectoral councils for the definition and design of occupational standards which are in turn used to define qualifications standards which underpin the NQF. Through this process employers' representatives input directly to the qualification design and are an element in qualifications quality assurance. In order for them to be able to intervene efficiently it is crucial that:

- They have a formal basis for their activities (a legal framework or equivalent) which is also related to funding (they can have the capacity to levy a fee on employers as in France; or receive lump sum funding from the government or receive project funding for specific activities);
- They have the capacity to engage in these activities as well as the knowledge of employers' needs (see also below). For example, the Luxembourg presentation noted that there was a lack of persons who would be ready to engage in these activities;
- They engage in cross-sectoral work regarding exchange of experience in methodologies for the design of standards or training of persons concerned (this is for example one of the roles of the NATB – a national level tripartite structure – in Romania).

It was also noted that while the representatives of the labour market had a clear role in strengthening the quality of qualifications through this process the public authorities may need to monitor that:

- Important overlap across standards developed by the different sectoral organisations is avoided (for example regarding transversal occupations such as sales);
- Certain coherence in approaches developed by the different bodies is maintained;

- That this does not lead to definition of qualifications that would be too narrow and consequently hinder portability.

It was also noted in the PLA discussion, though this point was not further developed, that sectors have different dynamics. While certain sectors may be more coherent (e.g. health related professions) and hence agreement may be more easily reached, others (e.g. services or food industry) present much more variety. Furthermore some sectors are dominated by SMEs and employers from this type of enterprises may have less time to dedicate to this type of activities.

Finally the presentations that covered the work of labour market representatives regarding qualifications standards predominantly apply to the VET sector. Cooperation with higher education remains limited and constrained to specific areas (concerning mainly regulated professions) such as engineering or health care.

Anticipation of skills needs

The understanding of current and future labour market needs was noted as one of the stakeholders' roles in qualification design by Portugal as well as Bulgaria. The Bulgarian presenter noted that the anticipation studies will be used to input to:

- Governing admission numbers to both VET and Higher Education;
- Organisation of training for adults; and
- Modernisation of curricula.

Assessment

Some presentations also underlined how stakeholders ensure the quality of qualifications awarded through their participation in assessment. This was specifically noted regarding:

- Qualifications achieved on the workplace (e.g. apprenticeships for young people but also adults) – see the presentation by the Maltese Employment and Training Corporation regarding Trade Testing to achieve the journeyman's certificate;
- Validation and recognition of non-formal and informal learning against standards developed by the sectoral councils (see for example the presentation of Romania).

Though these aspects of qualifications systems¹² are not directly components of NQFs they are crucial for NQF implementation as they underpin the quality and credibility of qualifications in the framework and also constitute elements of quality assurance for qualifications included in the NQF.

¹² Note: more could be identified but this sample only outlines those discussed during the PLA

7 LEARNERS' PERSPECTIVE

Considerations on learners' perspective on NQF developments were discussed during different sessions of the PLA but mainly on the occasion of a round table on the day one. The key issues from these discussions are synthesised here.

Learners' interest in recognition of learning outcomes from other contexts

The panel discussion during the PLA demonstrated that learners' interest in NQFs is closely related to the capacity of the NQF to support recognition of learning outcomes they have achieved in other settings:

- One of the panel speakers¹³ underlined that students should be able to receive credit for learning activities or products related to their qualification that take place outside the formal learning context. More specifically he noted that as a student in preparing for an audiovisual profession he should be able to get recognition for videos he produces outside the college.

Through the integration of credit in the Malta Qualifications Framework it is now possible for education and training institutions to include such learning in form of "additional credit" on learners' transcripts.

- Another speaker¹⁴ highlighted the benefits of having recognition for work-based learning (compulsory component of certain programmes) and for international internships.

Learners' involvement in quality assurance of qualifications

The representative of the University of Malta¹⁵ underlined the role students' feedback plays in design of higher education programmes. Students' feedback is requested at two stages first when a programme is proposed (is that a valid proposal?) and secondly once it has been designed. This is part of the quality assurance process.

However, the speaker also underlined that this approach requires empowerment of learners and their interest in improving higher education qualifications. So far, most learners do not have very clear expectations in terms of what should the education and training programme provide them with. Furthermore they are not used to raising their voice with regard to the topic of qualifications. However, as was underlined in this intervention, without their feedback the quality of the "product" cannot be improved.

¹³ Students' Representative Malta College of Arts, Science and technology

¹⁴ Students' Representative Institute of Tourism Studies

¹⁵ Academic Programmes Quality Resources Unit (APQRU) of the University of Malta

The framework as an instrument for education and training institutions to design pathways adapted to different learners' target groups

The Executive chairman of the Institute of Tourism Studies of Malta underlined in his presentation how the NQF enables his institute to design progressive learning pathways that learners can follow from lowest levels and which can lead them until highest levels of achievement. The institute is developing a modular provision of learning at different levels of the framework. It now wants to design programmes at the level of bachelor and master degrees that would specifically be aimed at people who already have experience and want to further upgrade their qualifications (e.g. having a cook qualification that would certify very high level of proficiency).

Learners' as users of the guidance that the framework enables

While learners may not be using the framework directly (e.g. they do not necessarily need to understand and know the level descriptors) but they will use the register(s) the framework is based on. The French presentation noted that there is evidence that the RNCP (the qualifications register) web-site is visited also by learners. This is a major motivation for improving its user-friendliness as well as for relating it to other existing databases and enable people to search not only for qualifications but also for information on training providers who prepare for these qualifications.

8 CONCLUSIONS

Through the discussion about stakeholders' objectives and responsibilities, the Maltese PLA highlighted a number of aspects around NQF design and implementation processes that should be paid particular attention in NQF policies. These conclusions are therefore written from the perspective that:

qualifications have multiple users (learners, employers and education and training institutions) and these groups have different interests in qualifications (access to a certain occupational category, recruitment for a specific job, progression to higher levels, etc.). Therefore the processes of design and implementation of qualifications frameworks have to address a variety of interests that can be contrasting in nature.

Based on the PLA presentations and discussions the following conclusions were made:

- In order to generate interest from the side of stakeholders it is crucial that the strategic vision for the NQF is clearly expressed and communicated. This will enable stakeholders to formulate their positions, establish dialogue and contribute to reaching this vision. Otherwise there is a risk of mistrust and lack of response from the side of stakeholders.
- In many countries NQFs bring in new concepts (or concepts that were never explicitly defined) and these need to be discussed and explained if they are to be translated into reality. The discussion of concepts and terminology is a critically important part of the engagement process as it supports dialogue and deeper understanding of different policy positions and expectations of NQFs.
- The NQF levels and level descriptors may be related to other structures in the country such as occupational hierarchies or admission criteria to levels of education and training. These are structures the stakeholders are already familiar with and feel ownership of. The qualifications framework should build on such existing structures describing them through the language of learning outcomes.
- In addition to the political vision the NQF also requires a management process. The NQF management should create the link between a top-down political process and the bottom-up process of creating qualifications and translating labour market and learners' needs into qualifications.
- The management process is facilitated by existence of leadership that is accepted by the different parties (e.g. shared governance of the organisation managing the framework). This process also requires clear operational (in terms of objectives, activities and timelines) and financial framework. It is crucial that the roles of different parties in this operational framework are clearly set so that everyone knows and agrees to how and where they contribute.

- Social partners but also sectoral organisations already have roles and responsibilities regarding VET qualifications however their engagement with the higher education sector is weak. This could become stronger with development of VET at higher levels.
- On the other hand the higher education sector has stronger tradition of engaging learners' representatives in quality assurance of programmes and qualifications, which is a dimension frequently missing in VET (even regarding parents' involvement in VET qualifications predominantly addressed at young learners).
- The existing stakeholders' responsibilities constitute the basis for NQF quality assurance.
- Stakeholders are the interface between policy-makers and learners. They have the direct access to learners and grassroots knowledge and understanding of their needs. These should be used in NQF development and implementation.
- Testing and piloting of level descriptors on specific qualifications is a good opportunity to give stakeholders a hands-on experience and understanding of what is a NQF and what does it imply in practice.
- From the side of policy-makers it is important to be able to manage stakeholders' expectations (especially in cases of conflicting interests) and also to have adequate capacity to address the needs a proper dialogue with a variety of players requires.

Finally, it was noted that in many countries NQF development is parallel with other lifelong learning reforms which are mutually reinforcing (quality assurance, recognition of non-formal and informal learning, etc.) and where stakeholders are given specific responsibilities. Giving them the broader picture of NQF development and where it sits with regard to this other reforms will clarify the strategic vision for the framework.