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Including non-formal sector qualifications in National Qualification Frameworks: a challenging process

A comparative analysis of 7 European NQFs reveals different patterns of inclusion of non-formal sector qualifications awarded outside the traditional educational context. However, all countries have in common the quest to achieve a good compromise between providing incentives for inclusion and maintaining overall framework coherence.

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At the 2000 Lisbon Summit, the EU Council endorsed enhanced European cooperation in the field of education and vocational training. One of the principal outcomes of this seminal decision was the introduction of the European Qualification Framework (EQF), which enabled countries to position their national qualifications within overarching European descriptor levels. Starting in 2008, member states were encouraged to develop national frameworks (NQFs), comprehensive 'maps' of national qualifications and the relationships between them, directly referenced with the EQF. This increased transparency across systems and borders was intended to help to promote the mainstreaming and comparability of qualifications at the European level.

Nowadays, 35 European countries have formally adopted their NQFs (Cedefop 2017). It can be assumed that the first phase of EQF-NQF deployment across the continent has been achieved. The current challenge is to develop full use of the framework, making it a tool for labour market transparency and dialogue between stakeholders.

The recently revised EQF strategy* encourages the development of comprehensive frameworks including qualifications of all types and levels, even if awarded outside the formal qualification system. In this way, NQFs will connect all the existing segments of national education systems. Nevertheless, such openness could lead to a loss of consistency, the proliferation of similar qualifications, loose accreditation processes and less clarity for users. How can NQFs be further populated with qualifications without losing overall coherence? NQF-In project allowed to examine in an unprecedented level of detail the forms of inclusion of quafications in seven different European NQFs (Box1).

Non-formal sector qualifications: what are we talking about?

How can an understanding of what lies behind the terms "non-formal" and "formal qualifications" be shared? These terms are commonly used however it's hard to find unambiguous definitions of these terms. "Formal qualifications" are usually defined as those qualifications that are awarded within the formal school system, whereas "non-formal qualifications" are those awarded by private training providers. The term "formal qualification" might also signal that it refers to qualifications that are included in the NQF, as opposed to non-formal qualifications, which are excluded. But this is at odds with the EU recommendation to extend the coverage of NQFs.

NQF-In empirical work led to a more accurate definition based on the legal status of the qualification (state-regulated or not). In addition, state-regulated qualifications can be divided in two sub-groups: those awarded in the education system and those awarded outside the education system. Thus three generic types of qualifications can be identified across the country reports:

Type A qualifications are regulated qualifications awarded in the formal, state-supervised education system, whether by public or private providers. The key characteristic of this type of qualification is that its functioning is governed by education legislation.

Type B qualifications are state-regulated qualifications awarded outside the education system; they are regulated by legislation or directly by ministries or government agencies but are not qualifications awarded in the formal education (school) system.

Type C qualifications are non-state-regulated qualifications whose functioning is not regulated by legislation.

* *Council Recommendation 2017/C189/03, "European Qualifications Framework for lifelong learning and repealing the recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning".*

1 Presentation of the project

NQF-in

This article draws on the outcomes of the Erasmus+ Project entitled *Developing organisational and financial models for inclusion of non-formal sector qualifications in National Qualifications Frameworks (NQFs).*

The main aim of the NQF-In project is to provide support to national governments, EU agencies and key stakeholders in developing policies for including non-formal sector qualifications. Seven European countries were studied. Three of them - Ireland, Scotland and France - are first-generation framework countries; Poland, Hungary and Croatia, on the other hand, have only recently adopted their NQFs or are at an advanced stage of implementation. The Czech Republic claims not to have a proper NQF but VET qualifications are regulated by a national register.

Web site: **http://www.nqf-in.eu/**.

These qualifications are usually awarded by private providers such as chambers of commerce, joint councils at industry or occupation level, charities, etc.

NQF-In partners were asked to classify their own countries' qualifications according to the proposed typology. From a comparative perspective, it is interesting to note that qualifications covering similar topics may relate to different types of qualification depending on the country (see craft certificates and real estate sales certificates - Box2). In most cases, similar qualifications are all classified coherently in the same category.

The guideline on "inclusion of a qualification in the NQF" relates to different formal procedures leading to the assignment of an NQF level to a qualification and its entry in a register of qualifications.

According to the available inventories (cf. further reading) most NQFs are composed only of type A qualifications. In the 7 NQFs analysed, types B and C are present but the way they are included differs considerably. Some NQFs, e.g. in Ireland and Scotland, are populated mostly by type A and type C qualifications. Some other NQFs include Type A and Type C plus a significant number of type B qualifications, as is the case in France and Poland.

If we look more closely at the French case, it is clear that a gradual shift has taken place from a fully state-owned formal system to a more hybrid one. Nowadays, not all Type A qualification are registered (general education diplomas are excluded) and a high share of qualifications are Type B, such as the many vocational certificates accredited by the Ministry of Labour and developed upon the recommendation of consultative committees at the occupation level. Many private and sectoral qualifications are included too; in accordance with our typology, these can be classified under type C.

Conditions and determinants for inclusion of non-formal sector qualifications

Now the building blocks of NQFs have been clarified, it is time to review the factors determining the addition of non-formal sector qualifications to the frameworks. Evidence from the national reports shows that different policy levers can influence framework developments, leading to differentiated outcomes. On the one hand, the inclusion process may move rapidly, leading to a proliferation of qualifications; on the other hand, inclusion may be limited by more stringent regulations that seek to maintain the NQF's overall coherence.

Three levers are discussed successively below: the organization of the inclusion procedure, ownership of qualifications and the costs of inclusion.

2 Examples of different types of qualification in the countries represented in the Project

	Type A qualifications (state-regulated qualifications awarded within the formal education system)	Type B qualifications (state-regulated qualifications awarded outside formal education system)	Type C qualifications (non-state-regulated qualifications)
Croatia	Certificate of completion of two-year VET programmes Certificate of completion of the state Matura (upper secondary leaving certificate)	Driving instructor's certificate **Real estate agent's certificate** Certificate of competence in foreign languages	Make-up artist's certificate Hiking guide's certificate
Czech Republic	Graduation maturita certificate (*maturitní vysvědčení* - upper secondary leaving certificate) Bachelor's degree certificate	**Real Estate Agent (Obchodník s realitami)** Tax Adviser (Daňový poradce)	Autodesk - AutoCAD 2012 Certified Associate ECDL Advanced Certificate
France	Vocational *baccalauréat* DUT (*University technological diploma – 2-year degree*)	Deck watch deputy officer Drama school national higher diploma	Building and public works supervisor Manager of a social unit and service provider for the elderly
Hungary	Secondary school leaving certificate (*Maturity*) NVQR Vocational qualification	**Master craftsman title** Foreign Language certificate	Certificates after completion of competence development training programmes
Ireland	Leaving Certificate Applied (for completion of secondary school) **Certificate for Regulated Craft Qualifications**	Tax consultant Approved Driving Instructor	Air Traffic Controller Pesticide Advisor
Poland	*Matura* certificate Vocational diploma	Tax advisor Nuclear regulatory inspector	Carpentry Assembly in Construction **Real estate management** **Craftsman diploma**
Scotland	Higher and Advanced Higher Awards Higher National Diploma	Dangerous Goods Safety Adviser Oil and Gas Sector Survival Course	Introduction to Actor Training Walking Tour Guiding

Source: NQF-In Project, Proposed Models of Including Non-formal Sector Qualifications in National Qualifications Frameworks, 2018.

• The way the different countries incorporate qualifications into their frameworks is crucial. Two generic ways can be distinguished: **inclusion by entitlement** and **inclusion by request**. Inclusion by entitlement means that a qualification is included almost automatically in the registry (or framework) at the moment of its creation. This is usually the case with type A qualifications and some type B qualifications. By contrast, including non-formal sector qualifications in NQFs, especially type C qualifications, is usually possible only upon application by the qualification owner (inclusion by request). In all countries, general rules are laid down for the process of inclusion by request. However, looking at the NQF-In national cases, three different governance approaches can be identified.

Centralised approach. One central institution is responsible for accepting applications, for analysing them and for making the decision on inclusion. This is the case in Ireland, where Quality and Qualifications Ireland (QQI) is the state agency responsible for including qualifications in the NQF database. Similarly, the French registry was supervised by the National Committee for Vocational Certification (CNCP) until 2018 and, from January 2019, by its successor body, *France Competences*. The CNCP analysed requests for including qualifications in the French registry and made recommendations to the Ministry of Labour, which then made the final decision.

Intermediate approach: different intermediary bodies in different areas of expertise are responsible for analysing proposals; submitting organisations make applications to one of these bodies. Poland is an example of this process. All requests to include market qualifications are subsequently submitted to the central institution operating the NQF registry. The central institution assesses the formal aspects of the application and then electronically transmits a completed file to the relevant ministry. The ministry reviews the submitted application and makes a decision.

Coordinated approach: the submitting organisation might approach some institutions as part of a process called 'third party credit rating'. This is the case in Scotland, where providers may select a credit rating body based on their preferences. The credit rating body assesses the submitted application and if the decision is positive, the relevant information is passed to the Scottish Credit and Qualifications Framework Partnership (SCQFP), which manages the Scottish Register.

A centralised approach should guarantee stronger coherence than a coordinated approach, since the same registration regulations apply to a wide variety of qualifications of different levels and types. In a coordinated approach, third party rating bodies could apply different rules and regulations, leaving more room for a diversity of approaches towards qualifications.

• **Ownership** has been identified within the NQF-In project as one of the crucial elements in the design of an NQF. Ownership of a qualification refers to whether a qualification included in the NQF is "open" to other awarding bodies. In other words, can other institutions apply to be awarding bodies for a qualification that is already registered in the NQF or not? With regards to ownership, two generic solutions can be identified: *private ownership* and *public ownership*.

In a ***private ownership*** context, an awarding body that submits a qualification to the registry (or framework) is the owner of the qualification. No other institutions can award this qualification without the consent of the original awarding body.

In a ***public ownership*** context, registered qualifications enter the public domain, meaning that they can be delivered by all awarding bodies that request to do so and fulfil the requirements, without any limitation on property rights.

A **private** NQF might have a tendency towards proliferation. This is due to the fact that the only way for new awarding bodies to enter the framework is to register new (even similar) qualifications because qualifications already registered are protected by intellectual property rights. On the other hand, **public** NQFs might discourage private institutions to submit their qualifications as they should transfer their ownership rights and know-how to the State. In addition, the State shall prohibit entering similar qualifications in the framework for safeguarding framework coherence.

For the above reason the ownership feature is tightly related to the level of proliferation of qualification, i.e. whether the NQF allows to encompass similar qualifications or not. Public ownership might protect NQF from being too fragmented gaining in clarity and making easier for learners and employers to navigate inside. However, it shall also disincentive private providers to register qualifications (particularly the non-formal ones).

Qualifications frameworks in France, Ireland, Scotland can be classified as private ownership frameworks whereas Poland, Hungary, Czech Republic and Croatia might be classified as public ones (Box3).

• Once again, two approaches to the **payment of fees** for submitting qualifications to the NQF can be identified. In the ***public financing model***, the state finances the whole process of including non-formal education qualifications. This is the case of France. Qualification registry (RNCP) operations are part of the public service and, as such, are free of charge. Applications and inclusions do, however, incur costs relating to the processing of the submission file. It is primarily the Ministry of Labour that bears these costs.

In the ***private financing model***, submitting bodies pay for applying and for inclusion in the framework.

3 **Comparative summary table of NQF inclusion procedures NQF-IN project member countries**

	Ownership	
	public	private
Centralized	**Croatia**	**France**
	Hungary	**Ireland**
Intermediate	**Czech Republic***	
	Poland	
Coordinated		
		Scotland

NO FEES **FEES**

*A Czech National Qualifications Framework with a single set of descriptors describing all types of qualifications does not exist yet. We refer here only to National Registers of Qualifications (NSK) aimed at regulating the VET sector.

This is the case in Scotland, Ireland, Poland and Hungary. In the last three countries, fees are set by a centralised authority, whereas in Scotland the fee determination is set by the credit rating bodies, which gives qualification providers some degree of freedom to choose which CRB to work with. Although the main rationale for introducing fees is to cover the administrative costs, the amounts vary considerably between countries; they are much higher in Ireland and Scotland.

The payment of high fees (as in Ireland and Scotland) can obviously give rise to a reluctance to register qualifications in the NQF, particularly among the smallest providers. Nevertheless, cumbersome and bureaucratic registration procedures, even where no fees are charged, can generate disincentives too.

NQFs Between incentives and coherence

NQFs referenced to EQF are potentially important policy instruments for promoting labour mobility and lifelong learning at the national as well as the European level. However, in order to gain visibility in the stakeholders' community, NQFs have to be open to the various types of qualifications (A, B, C types) awarded in different educational and training sectors. Being open is not enough: the system should be designed in such a way as to provide incentives for submitting qualifications by awarding bodies and at the same time should protect its internal consistency against too much proliferation.

Tighter, publicly managed qualifications frameworks with inclusion fees (as in Poland) are at risk of being less populated with qualifications and strong measure should be taken to push awarding bodies to submit their qualifications to the system.

At the other end of the spectrum, private ownership models without inclusion fees are at risk of being overfull. France could serve as an illustration, although the state exerts careful control over the inclusion of private qualifications in the NQF (proliferation in France is actually caused more by public providers, which are allowed to deliver similar qualifications). In Ireland and Scotland, high inclusion fees might deter smaller institutions from submitting their qualifications. This problem seems to be more of an issue in Ireland, which recently transformed its system from a publicly to a privately financed one. Policymakers have to make choices on the basis of their national priorities and the local reality the NQF is intended to regulate. In countries where the qualification framework is well established and widely shared among stakeholders, it might be prudent to work to prevent excessive proliferation. However, where the framework is still in its implementation phase, it would be wise to introduce measures to incentivise the registration of qualifications.

Further reading

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