

Ushirika wa Maendeleo ya Elimu Barani Afrika الرابطة لأجل تطوير التربية في إفريقيا Association for the Development of Education in Africa Association pour le développement de l'éducation en Afrique Associação para o Desenvolvimento da Educação em África

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> Promoting critical knowledge, skills and qualifications for sustainable development in Africa: How to design and implement an effective response through education and training systems

Sub-theme 2

Lifelong technical and vocational skills development for sustainable socioeconomic growth in Africa

National qualifications frameworks developed in Anglo-Saxon and French traditions

Considerations for sustainable development in Africa

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Working Document

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Acronyms and abbreviations

ADB	African Development Bank
ADEA	Association for the Development of Education in Africa
AFD	French Development Agency
APC	Approche Par Competences
BREDA	Dakar Regional Bureau for Education (UNESCO)
CAMES	Madagascan and African Council for Higher Education
CEDEFOP	European Centre for the Development of Vocational Training
CNCP	Conservatoire National des Arts et Métiers
COMESA	Common Market for Eastern and Southern Africa
COSATU	Congress of South African Trade Unions
DESD	Decade of Education for Sustainable Development
DEXCO	Division of the Examinations and Concourses (Senegal)
EAC	East African Community
GQF	German Qualifications Framework
ECOWAS	Economic Community of West African States
EQF	European Qualifications Framework
ETF	European Training Foundation
IATT	Inter-Agency Task Team (of UNESCO-BREDA)
ITAC	Industry Training Advisory Committee (Mauritius)
ILO	International Labour Organisation
INQAAHE	International Network of Quality Assurance Agencies for Higher Education
mnqf	Mauritian National Qualifications Framework
MQA	Mauritius Qualifications Authority
NGO	Non-Governmental Organisation
nqf	National Qualifications Framework
OECD	Organisation for Economic Cooperation and Development
PDEF	Programme Décennal de l'Education et la Formation
RNCP	Répertoire National des Certifications Professionnelles
RPL	Recognition of Prior Learning
RQF	Regional Qualifications Framework
SADC	Southern African Development Community
SAQA	South African Qualifications Authority
snqf	Senegalese National Qualifications Framework
sanqf	South African National Qualifications Framework
TVET	Technical and Vocational Education and Training
TVSD	Technical and Vocational Skills Development
UNDP	United Nations Development Programme

- UNESCO United Nations Educational, Scientific and Cultural Organisation
- **UNEVOC** International Centre for Technical and Vocational Education and Training (of UNESCO)
- UNIDO United Nations Industrial Development Organisation
- VAE Validation des Acquis d'Experience
- VUSSC Virtual University for Small States of the Commonwealth

1 ABSTRACT

i. This paper attempts to open the relatively unexplored territory of Anglo-Saxon and French influences on the development of national qualifications frameworks (nqfs) in African countries to policy makers at a time when many African countries are contemplating the development of nqfs. The paper draws on the findings of three case studies of nqfs in South Africa, Mauritius and Senegal as it enquires what the main differences between nqfs developed according to the French tradition and those developed according to the Anglo-Saxon tradition are. Importantly, the paper attempts to identify the advantages and disadvantages of each of the approaches for African countries, more so the extent to which the insights into country-specific contexts and the origins of specific nqfs improve the social legitimacy of nqfs for both the world of training and the world of work. In reflecting on the findings, it is proposed that a pragmatic and sustainable approach to nqf development in Africa, which also opens education opportunities for Africans in the global context, will require an emphasis on policy learning and a careful consideration of environmental, societal and economic factors.

2 EXECUTIVE SUMMARY

1. This report has been prepared for the ADEA Triennale to be held in Burkina Faso in 2011. It is based on a comparative study that considers the contribution of national qualifications frameworks (nqfs) to sustainable development in Africa, specifically when the original French and Anglo-Saxon influences on such countries are taken into account. The purpose of the study is to carefully examine those parts of the different colonial legacies that influence qualifications framework development that are worth retaining, and those that are not. As more African countries consider the development and implementation of nqfs, there exists a clear and urgent need for qualifications frameworks in Africa to be related to Africa's external communities, with a direct or indirect expression of Africa's preoccupations.

2. The study draws on the increasing international body of research on qualifications frameworks. It does not attempt to replicate existing work but rather builds on such findings, including an earlier study commissioned by ADEA on the implementation of nqfs in non-formal contexts by Veronica McKay and Norma Romm in 2006, and work by Maley O. Bassey in 1999 that was supported by ADEA and focused on the relationship between Western education and political domination in Africa.

3. The comparative study was completed over a six-month period between January and June 2011. The research design is primarily qualitative. It comprised a desktop review of the relevant literature and the preparation of three case studies on national qualifications framework development in South Africa, Mauritius and Senegal. Consideration was also given to developments in Ghana, Mozambique and Germany.

4. At a broad level a qualifications framework can be seen as an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved. The original thinking on qualifications frameworks took place in the context of emerging neo-liberal policies that emphasised the primary role of the private sector in economic development. This original thinking was also closely associated with Anglophone countries such as England, Scotland, Wales, the Republic of Ireland, New Zealand, Australia and South Africa, and to a lesser extent, also with France. The majority of the 'first-generation' qualifications frameworks were strongly influenced by the Anglo-Saxon education and training tradition, while the French national qualifications framework remained a unique member of this initial group, founded within the highly regulated French tradition.

5. Some features and dimensions of qualifications frameworks have proved in practice to be unpopular, costly, time-consuming, difficult to manage and even unworkable. The learning to be gained from such issues needs to be understood within the context of a highly complex web of situational factors unique to each framework development.

6. Education for sustainable development deals with the well-being of all three realms of sustainability, namely environment, society and economy, as well as the promotion of lifelong learning. Education for sustainable development should also be locally relevant, culturally appropriate and based on local needs, perceptions and conditions. It also needs to acknowledge that fulfilling local needs has international effects and consequences. Invariably lifelong learning needs to engage formal, non-formal and informal learning systems, while accommodating the evolving nature of the concept of sustainability.

7. Qualifications frameworks have not come to the fore through decontextualised and epistemologically neutral paths. It is contended that, just as there exists today a dominant but incorrect perception that formal education with its institutions and systems originated in the West, it would be easy, but just as inappropriate, to perceive qualifications frameworks as being antithetical to learning in an African context. In this regard it is useful to consider the development of the qualifications frameworks in general, but specifically in Africa, as a policy learning activity that affects both individual and organisational learning dimensions.

8. In order to effectively engage with the contribution of nqfs to sustainability in Africa it is important to take into account that nqfs have been influenced by Anglo-Saxon and French traditions, while the very contexts wherein they are being implemented have been affected by Anglo-Saxon and French colonisation. Under ideal conditions it should be possible to develop an nqf for an African country with an education system suited to that country. In order for nqfs to be sustainable in Africa the challenge has to be approached much more pragmatically.

9. South Africa has a well-established 'first generation' nqf developed during the early 1990s, and an education system influenced by the Dutch since 1652 and the English since 1897. The South African nqf was introduced with a strong transformative purpose to address the legacy of apartheid and has been developed over a period of 15 years. Recent developments have included the expansion to ten levels and the inclusion of professional bodies and professional designations within the nqf system.

10. Mauritius has a developed nqf and an education system influenced by both the French in the 1770s and the British in the 1800s, and as a result, remains saddled by a system of dual control. The development of the Mauritian nqf is considered one of the main initiatives to improve skills development and recognition of qualifications and has improved understanding of the previously prevalent 'jungle of qualifications' originating from the early French system, and more recent influx of British institutions.

11. Senegal has only started to move in the direction of an nqf as recently as 2008 and has an education system that has been subjected to French domination since 1659. Several reforms have been attempted but have been plagued by a lack of resources. Cooperation agreements with France have enabled recognition of Senegalese qualifications. Following the French educational model, the Senegalese education system is highly centralised through regional and local administrations, is related to levels of employment, and also allows for centralised assessments independent of the specific learning route followed. Once developed, the Senegalese nqf will be the first nqf in a French speaking African country.

12. Cross-cutting observations from the three case studies in South Africa, Mauritius and Senegal suggest that while common terminology is used, the meanings are often different across the Anglo-Saxon and French traditions. It is also observed that colonial legacies need to be transcended to make education more sustainable in Africa. Different approaches to governance, the importance of the social uses of qualifications, the potential benefits of starting with a sectoral qualifications framework, the need for advocacy and communication as well as the need for evidence to judge the effectiveness of nqfs is also observed.

13. Nqfs developed in the Anglo-Saxon tradition are increasingly being understood as frameworks that facilitate collaboration and coordination, and are overseen by central independent agencies. These nqfs also place strong emphasis on stakeholder involvement and are underpinned by enabling legislation. Nqfs developed in the French tradition tend to be more centralised, State-driven and bureaucratic and are overseen by different ministries, although mostly coordinated by one ministry. The legislative basis is comprehensive and includes also legal instruments to recognise learning across formal, informal and non-formal settings. In general nqfs developed in the Anglo-Saxon tradition are developed at the level of the learning system, while nqfs developed in the French tradition are located at the level of certification. These factors have important implications for sustainability on at least three levels: sustainability of the nqf itself, sustainability of the broader learning systems, as well as the sustainability of qualifications as a signal to society.

14. Across the Anglo-Saxon and French traditions nqfs are moving towards establishing closer linkages between qualifications and occupational classification systems, including a strong focus on the development of effective information management systems. There is a closer relation to Technical and Vocational Education and Training (TVET) reforms, emphasis on advocacy and communication, and direct involvement in regional qualifications frameworks.

15. The following recommendations are put forward to the ADEA Triennale in order to promote the sustainable development of qualifications frameworks in Africa:

16. A qualifications framework is a reflection of the society and values within a country and remains in permanent evolution. The sustainability of a qualifications framework is based on the coherence of this representation of society, specifically the representation of its qualified citizens.

17. Qualifications framework development is a global phenomenon that is impacting on African countries as the frameworks are used as a highlighting tool to improve the quality of education systems, as a driver to reform educational policies, to enhance accessibility and promote the recognition of qualifications within and beyond the borders of countries. Qualifications frameworks are, however, not uncontested, nor are they neutral policy instruments. Evidence of the impact of qualifications frameworks, as planned by policy makers, remains limited and the expectations associated with implementation is often unrealistic. African countries considering qualifications frameworks should be cautious and pragmatic in their approach.

18. Education systems in Africa have been influenced through extended periods of colonisation and more recently through different foreign approaches. Qualifications frameworks currently being implemented and/or considered in many African countries have been influenced by both the Anglo-Saxon and French contexts wherein they originated. The borrowing of these foreign nqf models to be implemented in education systems in Africa already skewed by colonisation and/or other more recent influences, should be replaced by an emphasis on learning from the mistakes and successes made in the English and French contexts. The implementation of nqfs based on African values and functions within societies will permit more appropriate learning processes for Africa.

19. A pragmatic and sustainable approach to nqf development in Africa, which also opens education opportunities for Africans in the global context, requires an emphasis on policy learning and a careful consideration of environmental, societal and economic factors. In this regard there is much to learn from nqfs developed in both Anglo-Saxon and French traditions.

3 INTRODUCTION

3.1 Location of study

20. Qualifications framework development is a fairly recent but highly influential feature on the global education and training agenda. Across the world many countries and regions are now not only talking about qualifications frameworks, but are either already implementing national, regional and even transnational qualifications frameworks, or at the very least, are engaged in initial exploratory discussions, feasibility studies and drafting of concept documents (Keevy and Samuels 2008). The first generation of qualifications frameworks were developed from the early 1990s in a handful of countries: Australia, New Zealand, South Africa, Republic of Ireland, England, Wales and France. With the exception of France, all these early national qualifications frameworks (nqfs) were directly influenced by Anglo-Saxon traditions, in some cases as a result of many centuries of educational tradition, in other cases as a result of more recent colonial legacies.

21. Today many more countries and regions are developing various forms of qualifications frameworks. The African continent is no exception. South Africa, Namibia and Mauritius are at advanced stages of implementation, the SADC region is considering a regional qualifications framework. Ethiopia, Kenya, Tanzania, Tunisia, Nigeria and Senegal are at an early stage of implementation, to mention but a few. Underlying this trend towards qualifications frameworks by governments across the world, including developing countries in Africa, and with support from a range of international organisations such as the International Labour Organisation (ILO), United Nations Development Programme, European Union, World Bank and United Nations Educational, Scientific and Cultural Organisation (UNESCO), an important critique of qualifications frameworks is also emerging.

22. This comparative study considers the contribution of nqfs to sustainable development in Africa, specifically when the French and Anglo-Saxon colonial influences on countries are taken into account. The study attempts to address this relatively unexplored area as it draws on the increasing international body of research focusing on qualifications frameworks. The study does not attempt to replicate the existing work but rather builds on such findings, including an earlier study commissioned by the Association for the Development of Education in Africa (ADEA) on the implementation of nqfs in non-formal contexts by Veronica McKay and Norma Romm in 2006, and work by Maley O. Bassey in 1999 that was supported by ADEA and that focused on Western education and political domination in Africa. The three detailed case studies selected for the research, namely South Africa, Mauritius and Senegal, also draw on earlier in-country and international studies, such as was conducted by the ILO in 2010, as they focus more specifically on shared learnings across the English and French traditions which has influenced their education and training systems, and as a direct result, also their nqfs.

23. While this report had been prepared specifically for the ADEA Triennial to be held in Burkina Faso in 2011, it is important to note that the intention to undertake a study in this area originates from an earlier regional seminar on post-primary vocational education and training organised in Reunion in May 2010 by the *Centre International D'études* which focused on the right to education and decent work in post-primary vocational education and training. The recommendation for a study on the Anglo-Saxon and French traditions influencing nqfs, which was supported by amongst others, participating members from the French Development Agency, ADEA, the European Commission and the African Union, proposed the sharing of learning related to nqfs, specifically in the area of the recognition of non-formal and informal learning, across the English and French traditions. The concept of the study was thereafter presented at the preparatory workshop for the ADEA Triennial held in Tunis in September 2010, as well as at the regional workshop for sustainable and effective Technical and Vocational Skills Development (TVSD) in Tunis in October 2010. It is anticipated that

the study will be further developed following the Triennale to allow for the inclusion of additional countries and the deeper interrogation of the findings of the initial study.

3.2 Context and rationale

24. The body of conceptual and comparative research into the role and nature of qualifications frameworks is gradually increasing and is starting to provide an important basis for new developments, more so for the recently emerging nqfs, many of which can be found on the African continent. Due to the diversity of the countries involved and the obvious differences in language and education and training system traditions, the nqf discourse has gradually become polarised between the two main influences, namely that of the Anglo-Saxon and French traditions. While there have been some exceptions (see Charraud & Paddeu 1999, Bouder 2001, Werquin 2010 and Chakroun 2010) the English and French literature on nqfs remain by-and-large separate and inaccessible to researchers and policy makers outside of the specific traditions. This point is emphasised by the ILO in its recent study on the impact of nqfs:

A gap in this collection of case studies [conducted by the ILO] is that of France, which could provide a very different way of designing and implementing a qualifications framework. France, although a latecomer to the NQF policy world, arguably has had an NQF in development for many years, and the French model may be influential in Europe and elsewhere in the world. (ILO 2011)

25. Considering this relatively unexplored area, this comparative study was recommended by the regional seminar on post-primary vocational education and training organised in Reunion in May 2010. The seminar highlighted the importance of understanding and improving the existence of an nqf in a country, more so in developing countries, such as in Africa. The seminar also showed that it is relatively easy to find similarities when it comes to general education and certification related to the assessment of learning, but that it is more difficult in the field of post-primary education and training and even more complex when it comes to training and certification for professional fields which represent complex societal dimensions that show very different perceptions of what is meant by 'qualification', 'articulation' or 'competence'.

- 26. Two main areas that were identified at the seminar are addressed in this study:
- Certification or recognition of the achievements of individuals, which is the dominant model in the Frenchinfluenced systems, as opposed to 'training courses in learning systems', which is dominant in the Anglo-Saxon models.
- The importance of context and insight into the origins of specific nqfs, more so the official policy decisions to provide criteria of quality and value in a societal context on the basis of a social legitimacy for both the world of training and the world of work.

27. It appears that in all countries, training needs to have given rise to systems and sub-systems of education appropriate to different audiences. Their coexistence and juxtaposition has led to an interference effect accentuated by the absence of bridges and the non-recognition of their value in national, regional and sectoral levels. This situation can be explained in part by the rigidity of the African systems locked on the old French scheme that existed at the beginning of the 1960s, while in France itself an important evolution continued which was open to a large range of authorities in charge of qualifications and non-formal and informal learning outcomes recognition. Further discussions have identified two types of countries: countries with an existing framework, and countries that have expressed the intention to develop nqfs, but are still at an early stage. As part of the seminar, the descriptions of existing frameworks showed highly differentiated forms of organisation and design, pointing to at least two models that strongly mark the landscape on the African continent and, to some extent, also in Europe:

• Nqfs characterised by the development of 'agency' approaches inspired the Anglo-Saxon tradition.

• The significance of a dominant educational system from an old French tradition of education.

28. In the movement of economic globalisation and acceleration of international trade companies and individuals, the need for communication and clarity of individual achievement represents a major challenge extending far beyond the mere description of national educational systems and content of training programmes. It is also not surprising to note the intense international interest in the establishment of national or regional qualifications frameworks with a view to positioning of people and specifying the use of their experience. It is also not surprising to note the involvement of the world of work in a process that to date has been the exclusive domain of education and training roleplayers.

3.3 The research design

29. This study was completed over a six month period between January and June 2011. The research design is primarily qualitative and comprises a desktop review of the relevant literature and the preparation of three case studies by researchers who have been intricately involved in nqf processes in each of the countries and the regions wherein they are located for several years. The research design is based on the two overarching research questions that follow from the key focus areas and contextual overview:

- What are the main differences between the nqfs developed according to the French tradition and those developed according to the Anglo-Saxon tradition? What are the advantages and disadvantages of each of the approaches for African countries and how do these contribute to sustainability?
- How can the insights into country-specific contexts and the origins of specific nqfs improve the sustainability and social legitimacy of nqfs for both the world of training and the world of work?

30. While the selection of the three countries was based in part on the willingness of the three countries to provide research capacity in support of the ADEA Triennale, the significant colonial influence on the nqfs in each country was the main reason for the selection: the South African nqf reflects the English or Anglo-Saxon heritage, in Senegal the emerging nqf can be traced back to a strong French heritage, and the Mauritian nqf reflects an education and training system that has been influenced during both French and Anglo-Saxon periods. This comparative study draws mainly on these three case studies as it attempts to identify shared learnings across the English and French traditions with a specific focus on the extent to which nqfs are able to promote sustainable development in the African context.

31. The three case studies were completed in the form of country reports, using an agreed format, by researchers who have been involved in nqf development and implementation in each of the countries: James Keevy (English speaking) from the South African Qualifications Authority, Anne-Marie Charraud (French-speaking but with a good command of English) associated with the French *Conservatoire National des Arts et Métiers*, the *Commission Nationale de la Certification Professionelle* and who also supported the development of the nqf in Senegal as technical advisor to the Senegalese government, and Kaylash Allgoo (English and French speaking) from the Mauritius Qualifications Authority. Cross-cutting observations were made based on the case studies and further interrogated through participation from other countries and organisations. The South African and Mauritian case studies were written in English, while the Senegalese was written in English, despite the Senegalese work being done in French. The final version of the report will be presented to the ADEA Triennial in December 2011 for consideration by senior officials and policy makers within Africa.

32. In an attempt to broaden participation in the study, the initial reports on the country experiences were opened to voluntary participation amongst countries and agencies within the ADEA context. Ghana and Mozambique responded within the time constraints of the project. Consideration was also given to the progress with the German Qualifications Framework for Lifelong Learning

(*Deutscher Qualifikationsrahmen für Lebenslanges Lernen*) due to the fact that the German dual model continues to influence education reform, including nqfs, in Africa.

3.4 Structure of the report

33. The remainder of the report is structured according to three areas. Part 4 provides an overview of the conceptual framework of the study, including understandings of qualifications frameworks, the extent to which qualifications frameworks can contribute to sustainable development, as well as thoughts on non-formal and informal learning and regional developments. Part 5 is an account of the three detailed case studies on nqf development in South African, Mauritius and Senegal. Brief observations from other countries within the ADEA community (Ghana, Mozambique and Germany) are also included. Part 6 locates the findings emanating from the case studies within the conceptual framework by making cross-cutting observations culminating in a set of three recommendations to the ADEA Triennial.

4 QUALIFICATIONS FRAMEWORKS IN AFRICA

34. This section provides an overview of the main components that make up the conceptual framework for the study. Starting with a discussion on the emerging common understandings of qualifications frameworks, it continues with a reflection on the meaning of sustainable development and the global advent of nqfs. The section also includes a critical reflection on the extent to which qualifications frameworks in Africa have been 'borrowed' from the first generation nqfs. The section ends with a discussion on the two emerging regional qualifications frameworks in South and West Africa as well as some thoughts on the recognition of non-formal and informal learning.

4.1 Towards a common understanding of qualifications frameworks

35. Since the first qualifications frameworks were introduced in the United Kingdom in the mid-1980s, more and more countries have developed their own frameworks. While such developments were initially confined to the Anglophone countries of the Commonwealth, with the exception of France, the interest has more recently extended to a much wider range of countries including South America, the Middle East, Eastern Europe and the Asia-Pacific region (see Burke *et al* 2009, CEDEFOP 2009 and Chakroun and Castejon 2010).

36. At a broad level, a qualifications framework can be seen as an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved (Coles 2006). The Organisation for Economic Cooperation and Development (OECD) definition of a qualifications framework is more comprehensive and adds dimensions of scope and purpose:

A qualifications framework is an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved. This set of criteria may be implicit in the qualifications descriptors themselves, or made explicit in the form of a set of level descriptors. The scope of frameworks may take in all learning achievement and pathways or may be confined to a particular sector, for example initial education, adult education and training or an occupational area. Some frameworks have a tighter structure than others; some may have a legal basis whereas others represent a consensus of social partners. All qualifications frameworks, however, establish a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country or internationally. (OECD 2007: 179)

37. There is increasing activity from international agencies in the area of qualifications frameworks, including the OECD, ILO, the World Bank and the European Union. In addition, countries with explicit frameworks (also referred to as first generation nqfs) such as England, Ireland, Australia, New Zealand and South Africa are regularly engaged with other countries and as a result, are supporting the global trend towards the development of national, regional and transnational qualifications frameworks. The key underlying drivers for this increased interest and activity has been the increased awareness and value of lifelong learning, the need to improve people's employability in the emerging knowledge economy, together with increased internationalisation and globalisation of learning and the development of wider regional and transnational labour markets.

38. In theory the benefits accruing from the careful design and implementation of qualifications frameworks to address specific educational, social and economic issues are considerable, but in practice implementation has often been controversial and attracted strong criticism and resistance. Despite being apparently valid responses to the issues that are being addressed, some features and dimensions of qualifications frameworks such as over-prescriptiveness and unitisation have proved in practice to be unpopular, costly, time-consuming, difficult to manage and even unworkable while other features, such as increased communication, coordination, collaboration and articulation have proved to be beneficial. The learning to be gained from these experiences needs to be understood within the context of a highly complex web of situational factors unique to each framework development. Thus while much can be learnt from past experiences, there are no simple solutions and many issues remain unresolved. This study attempts to shed more light onto one such aspect, namely the extent to which Anglo-Saxon and French traditions present in three African countries have contributed to not only the form and function of the nqfs in each country, but also to the extent to which these nqfs are able to contribute to sustainability. The purpose of the study is not to present a critique of colonialism in Africa, but rather to carefully examine the parts of the different colonial legacies that are worth retaining, and those that are not.

4.2 Education for sustainable development

39. As countries across Africa are impacted upon by global factors such as economic crises, energy shortages, climate change and the increased movement of the highly skilled to more developed countries, there is increased recognition that:

...capacity for developing and implementing sustainable development practices in all sectors of society is no longer an item on [African nations'] wish list, or a rhetorical concern, or a matter for the privileged (Lotz-Sisitka 2010: 351).

In 2005 the United Nations declared the years 2005-2014 to be the Decade of Education for 40. Sustainable Development (DESD), challenging African countries to think about their environmental, economic and social systems by encouraging growth that is good for the planet and for people. The basic vision of the initiative rests on using all forms of education as a catalyst to "bring about change in values, attitudes and lifestyles to ensure a sustainable future and the evolution of just societies" (UNESCO 2007: 5). The essential characteristics of education for sustainable development, identified through the DESD, include education that is based on the principles and values that underlie sustainable development, deals with the well-being of all three realms of sustainability, namely environment, society and economy, and promotes lifelong learning. Education for sustainable development should also be locally relevant, culturally appropriate and based on local needs, perceptions and conditions, but acknowledge that fulfilling local needs often has international effects and consequences. Education for sustainable development should engage formal, non-formal and informal education, while accommodating the evolving nature of the concept of sustainability. When considering the contribution of qualifications frameworks to sustainability it is useful to distinguish between at least three different though related dimensions: (1) the sustainability of the ngf itself; (2) the sustainability of broader learning systems in order to develop citizens' competencies; and (3) the sustainability of qualifications as a signal for society.

41. Considering initial results of the DESD in Africa (UNESCO 2007), as well as from the work of the UNESCO Institute for Lifelong Learning (see UIL & SAQA 2011), sustainable development in Africa should also take the following realities into account:

- The full significance of the recognition of alternative learning pathways for personal development and successful learning is not fully captured by education and training institutions.
- There is lack of awareness among all stakeholders to see recognition as a shared responsibility.
- There is lack of awareness of seeing the potential of recognition for the integration and empowerment of marginalised populations and individuals (uneducated and unemployed), as well as motivation to continue to learn.
- Recognition of non-formal and informal learning is not made an explicit part of lifelong learning strategy and education and training policies.
- Learning outcomes-based references are not yet introduced systematically.
- African countries have not yet developed transparent quality assurance for certification processes that enable non-formal and informal learning to be accorded the same quality requirements as formal learning.
- Summative and formative assessments are not linked to other tools such as guidance, counselling and credit accumulation.
- Progression pathways and alternative learning pathways are not identified and institutionalised.
- Basic tools and instruments for the identification, documentation and validation of learning outcomes from non-formal learning are not in place for formative and summative assessments.

42. The recognition of non-formal and informal learning outcomes deals mainly with the third dimension of the potential contribution of nqfs to sustainability, namely the value of qualifications to society. In the French approach the qualification is not related to an exclusive curriculum or route, which may be one reason why it has been successful. As an example, Senegal shows this tendency by admitting applicants coming from non-formal learning routes to their formal assessment procedure. Importantly, the extent to which qualifications frameworks will be able to contribute to sustainable development practices, and as a direct result, will be able to address the realities listed above, is closely related to an understanding of knowledge and learning, that in turn, requires an understanding of the political economy that exists at a given time (see Walters 2010).

4.3 The global advent of qualifications frameworks

43. The 19th century brought with it a wave of liberalism and consciousness of equal rights and opportunities, accompanied by increased urbanisation and bureaucratisation. The increased need for skilled manpower eventually resulted in an emphasis on credentials that persists to the present day. During the 20th century the emphasis shifted to human capital theory and technological development, eventually leading to concerns about whether the education system was able to meet the demands of the labour market. Partly in response to these and other related concerns, a more futuristic approach to education and training was envisaged at the end of the 20th century (Mukora 2007), one wherein "educational and social inequalities were being sustained by academic and vocational divisions and between school and non-school knowledge" (2007: 2). At the time it was argued that the strong divisions were creating barriers to learning and that there was a need to do away with the strong distinction between academic and vocational systems. At the same time, during the late 1980s, and strongly influenced by this thinking on integration but also by a focus on vocational training through a competency approach, the notion of an nqf emerged in the United Kingdom (UK):

The idea of a national qualifications framework has its intellectual roots in the competence approach to vocational education which was broadened by Jessup (1990) and others in England who developed the idea that all qualifications could (and should) be expressed in terms of outcomes without prescribing a learning pathway or programme (Young 2005: 5).

44. Early nqf developments first surfaced as National Vocational Qualifications with an overt political function to transfer "the control of vocational education from providers to employers" (Young 2005: 6). Concurrent with the development of the English competence-based model, the development of the Scottish outcomes-based approach, with a strong focus on lifelong learning,

provided a useful alternative platform for nqf development in the UK. Later, in the mid-1990s, with renewed interest in lifelong learning, the idea of an nqf resurfaced offering "the possibility of promoting lifelong learning by accrediting all types of learning wherever it took place and whatever the age of the learner" (Young 2005: 7).

45. Today more than 130 countries and at least four regions across the world are exploring and developing qualifications frameworks (ILO 2011). Some member States of the European Union, the Accession countries, some former Soviet Republics, and SADC countries such as Mauritius, Namibia, Botswana, Tanzania, Zambia and the Seychelles, are at various stages of nqf development and implementation. Providing a useful period-based grouping of qualifications frameworks, Tuck *et al.* (2004) identified a range of qualifications frameworks being implemented across the world. In another review, Coles (2006) supplements this list with numerous other countries that are currently considering or planning full or partial qualifications frameworks: Albania, Austria, Belgium (Flanders), Belgium (Wallonia), Bulgaria, Canada, Croatia, Czech Republic, Denmark, Germany, Greece, Hong Kong, Hungary, Iceland, Italy, Lithuania, Luxembourg, Malta, Mongolia, Norway, Pakistan, Poland, Portugal, Romania, Russian Federation, Slovak Republic, South Korea, Spain, Sri Lanka, Swiss Confederation, Thailand, Ukraine and Vietnam (also see Deij 2009).

46. Although France never used the term 'nqf' until the European Qualifications Framework (EQF) recommendation was made in 2008, a number of similarities with the Anglo-Saxon developments can be observed, some from as early as the 1960s. In order to provide some planning for vocational training development, a mapping of the existing offer was produced and classified under two descriptors: a grid of levels set up in 1969, and training domains initially presented through 47 groups revised in 1994 with 4 main blocks and 96 specialties. The framework structures, including statistics, political plans, surveys and regional or sectoral observatories were set up by the *Répertoire national des certifications professionnelles* (RNCP) from 2002. The grid of levels was developed to establish a link between the qualifications and the work organisations, and as the grids covered both TVET and higher education, it was easy to switch the RNCP format to the EQF principles when this became necessary in 2008.

47. The original thinking on qualifications frameworks took place in the context of emerging neoliberal policies that emphasised the primary role of the private sector in economic development. This original thinking was also closely associated with Anglophone countries such as England, Scotland, Wales, the Republic of Ireland, New Zealand, Australia and South Africa, and to a lesser extent, also with France. It is apparent that the majority of the first-generation nqfs were strongly influenced by the Anglo-Saxon education and training tradition, while the French nqf remained a unique member of this initial group, founded within the highly regulated French tradition.

48. Despite the continued global spread of qualifications frameworks, several areas have been contested, resulting in an evolution of the original idea that emerged in the 1980s. Two key areas of contestation stand out:

- Firstly, the concerns about the diffusion of qualifications frameworks and, to a lesser extent, also outcomesbased education, into Africa (Chisholm 2007). Under the broader discourse of policy borrowing, qualifications frameworks are seen as exemplars of foreign, mainly Anglo-Saxon policies that are imported into developing countries (mainly in Africa) without the necessary 'indigenisation' taking place.
- The second area of contestation relates to the new forms and divisions brought about by globalisation that emphasises the distinction between academic and vocational systems (i.e. education and training) in direct contradiction to the unifying approach inherent in many qualifications frameworks (Mukora 2007).

4.4 Policy learning and an African philosophy

49. Just as with each phase of the development of education systems over the many centuries, qualifications frameworks have not come to the fore through a decontextualised and epistemologically neutral path. This path can, however, not be described as purely Anglo-Saxon or French; on the

contrary, it is contended by some authors that the gradual formalisation of learning has been strongly shaped by indigenous, communal and religious influences from elsewhere, including also Africa (Higgs and Keevy 2009). It is contended that, just as there exists today a dominant but incorrect perception that formal education with its institutions and systems originated in the West, it would be easy, but just as inappropriate, to perceive qualifications frameworks as antithetical to learning in an African context.

50. In this regard it is useful to consider the development of the qualifications frameworks in general, but specifically in Africa, as a policy learning activity, and draw on a study by Chakroun (2010) on policy learning in the context of national qualifications frameworks. In the study he suggests that two dimensions of policy learning need to be considered: individual learning that emphasises participation in peer learning and contribution to policy-making processes, based on the assumption that involvement in policy learning increases the expertise of the individual policy makers; organisational learning through which individual learning can be channeled to generate and sustain changes at the wider institutional level. An important emphasis is placed on learning from own experiences and through peer learning as opposed to direct importation of best practice from elsewhere:

[Peer learning] focuses on the capacity of policy makers in specific countries to learn from their own experience and from that of other countries in ways that strive for a deeper understanding of policy problems and processes than what is provided by simply seeking and implementing best practice (Chakroun 2010: 205).

51. A number of useful considerations come to the fore if we follow the application of the policy learning model to the development and implementation of nqfs as outlined by Chakroun (*ibid*.). The following observations stand out:

- The involvement of social partners and other stakeholders is important and greatly improves contextual specificity. The reluctance of social partners to become involved in some parts of the world, such as the Mediterranean region, as opposed to the widespread involvement in other parts, such as in Europe, needs to be considered.
- Reference to source of best practice (such as nqfs developed elsewhere in the world), while pragmatic and understandable, has several drawbacks. This approach limits the extent to which countries are able to preserve the coherence and integrity of national systems as well as the extent to which stakeholders are able to discuss and understand specific national contexts and problems, which in turn, reduces the understanding, leadership and ownership of the policy itself.
- Technical assistance often leads to the development of literature that is not embedded in national contexts. It is apparent that the donor community has become accustomed to this approach and it may be difficult to change existing practices.

52. Considering the importance of policy learning, also in the development of the nqfs in Africa, it is necessary to carefully consider what meaning we attach to the adjective 'African'. As pointed out by Higgs and Keevy (2009), African philosophy can be based on both geographical and cultural criteria: some authors, such as Mudimbe (1998) and Hountondji (1985) regard an intellectual product as African simply because it is produced or promoted by Africans; in the case of the cultural criterion, authors such as Gyeke (1987) regard an intellectual product as African if it directs attention to issues concerning the theoretical and conceptual underpinning of African culture. Higgs and Keevy (2009: 692) suggest a 'both/and' approach that avoids the preoccupation with definitions:

In citing these two polarised views as to what constitutes being 'African', we would like to suggest that a distinctively African identity is not constituted by either/or, but rather by both/and. That is, both geographical and cultural factors constitute an African identity in that these factors are necessary constituents of the experience of being 'African', and therefore also of understanding what could be an 'African philosophy'.

53. Central to the issue of philosophy in Africa is the question of relevance and usefulness, and the ability to contribute to political, economic, ethical and general upliftment. Pragmatism and ability to render a 'service' is also important, as well as effective contribution to the amelioration of the lived

and existing human condition. The deconstruction of the colonial discourse and the demise of European hegemony that requires us to rethink the African situation beyond the confines of Eurocentric concepts and categories (Serequeberhan 1994) is another important factor although this does not preclude us from relating Africa to its external community, including the West and Europe. Hountondji (2002: 139) describes the space wherein critical discussion and reflection on African issues can take place as follows:

...an autonomous space where the themes explored would no longer be a distant echo of those developed by Western knowledge, but the direct or indirect expression of Africa's own preoccupations.

54. As more African countries consider the development and implementation of nqfs, there exists a clear and urgent need for qualifications frameworks in Africa to be related to Africa's external communities, but with the direct or indirect expression of Africa's own preoccupations.

4.5 Regional qualifications frameworks in Africa

55. Qualifications frameworks that are developed across borders are commonly referred to as transnational qualifications frameworks (Keevy *et al* 2011). This includes regional qualifications frameworks where countries in the same geographic proximity collaborate to improve cross-border recognition of qualifications. In the context of this study on nqfs in Africa, it is important to take note of the regional developments as these often have a direct impact on in-country developments. The examples of the Southern African Development Community (SADC) and Economic Community of West African States (ECOWAS) are discussed below.

In 1997, following the signing of the SADC Protocol on Education and Training, the SADC 56. Technical Committee on Certification and Accreditation was established to oversee harmonisation and standardisation of education and training systems within the SADC region. The need for harmonisation was driven by the huge diversity of education and training systems within member States directly as a result of the colonial legacy within the region; this ranges from Anglophone countries (such as Botswana and South Africa), Lucophone (such as Angola and Mozambique) and Francophone (such as the DRC and Mauritius). A core objective of the Technical Committee was the development of a regional qualifications framework for the SADC region, the SADC ROF, envisaged as the most sustainable strategy through which the objective of the SADC Protocol on Education and Training could be achieved. At the time the development of the SADC RQF remained largely isolated from similar developments in Europe and the Caribbean, but was strongly influenced by the ongoing implementation of ngfs in South Africa, Namibia and Mauritius. The extent of this influence remains contested, more so as other transnational developments, some which started much later overtook the SADC ROF. A key factor in this regard was the decision to prioritise the development of ngfs in member States of SADC.

57. The SADC RQF is presented as a home-grown strategy that has attempted to take the unique context of the region into account. In addition to the challenges of different levels of development and extreme economic disparities (for example between South Africa and Zimbabwe), the different education systems (English, French and Portuguese) within the region as a result of colonisation remains a key challenge. The influence of other international developments, such as the EQF and Bologna in Europe, is however recognised but tempered by the fact that the SADC RQF started much earlier and was therefore less influenced from outside. It is acknowledged that lessons from outside of SADC, such as in the Caribbean, have not been sufficiently explored over the years. More recently the direct influence of the EQF in developing the draft SADC RQF level descriptors is recognised (Schmidt 2009), as well as the increased demand that the SADC RQF mechanism translates not only in the region, but also with other regions (Keevy *et al* 2011). The lack of trust between member States, mainly as a result of the diversity of the education and training systems and the varying levels of development between countries, is recognised as a key challenge in the region. The dominance of the

Anglophone countries in the region, directly as a result of the fact that the emerging NQF approach originated mainly in the Anglo-Saxon world (UK, Scotland, Australia and New Zealand) suited these formerly colonised countries much better, continues to be contested.

58. The sustainability of the SADC RQF has become directly dependent on nqf development in the region as a result of the prioritisation of nqfs. All SADC member States are currently involved in nqf development, and while the decision in countries to develop nqfs is not as obvious as with the EQF, the SADC RQF has nonetheless acted as an important catalyst. When compared to the antecedents of the EQF in Europe, namely the Bologna process, the Lisbon strategy and the Copenhagen process, it is evident that the SADC region has moved at a slower pace. Without trying to suggest that the EQF process represents an ideal that must be followed to the letter in other parts of the world, it is important to note that similar interventions were developed in SADC, with significant activity during the same period (mainly between 1997 and 2005), but at a much slower pace. The SADC Protocol on Education and Training remains an overarching policy for the recognition of qualifications in the region, but has had limited impact. The Arusha Convention, which was adopted as early as 1982, and revised several times after that (2002, 2003 and again in a process that started in 2008), remains a key supporting structure for the SADC RQF that is yet to provide the broader stabilising effect that is needed.

59. The implementation of nqfs and a regional qualifications framework is also a priority of the Education Ministers of ECOWAS (Charraud and Werquin 2010). After a first conference that took place in Dakar in 2002, two reference documents were published in 2003: the *Protocol on Education and Training* and its annex on the *Equivalence of Certificates*. From the Protocol, it became clear that the main interest of Ministers was to have a holistic approach concerning the whole range of provision from basic to higher education and to adult learning. In the *Equivalence of Certificates*, a focus was placed on the assessment of knowledge, skills and competences and their recognition for (re)entering the formal education and training system and/or the labour market. This approach aimed also at facilitating geographical, occupational and social mobility. The Protocol also translated the African Union priorities of the First Decade for Education (1997-2006) into five objectives including Technical Vocational Education and Training (TVET).

60. After defining the priorities during the first conference in Dakar, the second conference in Accra in January 2004 decided on the action plan for implementation. In January 2005, in Khartoum, the Africa Union published a new action plan for the Second Decade for Education in Africa (2006-15). A third conference of the Ministers of Education took place in Abuja from 17-20 March 2009. There was commitment to adapting this new action plan for implementation in ECOWAS. On this occasion, Ministers insisted on the setting up of partnerships among international stakeholders. An additional extraordinary conference was held in Maputo for organising this international cooperation. Bodies such as ADEA, the International Centre for Girls and Women's Education in Africa, UNAIDS, UNESCO, UNICEF and the World Bank were involved.

61. In Abuja in 2009, two main themes were identified as main priorities for action: creating a labour market information system, and establishing nqfs. The former, through the availability of better data, was presented as one of the key factors contributing to an efficient TVET provision. These objectives have been identified for ECOWAS but also have a lot of value for every single country in the region, whatever the level of implementation of TVET. During their conference in March 2009 in Nigeria, ECOWAS Education Ministers committed to engage in actions permitting the achievement of these objectives. After the conference, a seminar was set up in Abuja again, in August 2009, aimed at implementing the ECOWAS priorities defined in March 2009. In this context, United Nations Development Programme (UNDP) and UNESCO-BREDA set up a task force named the Inter-Agency Task Team (IATT) with the purpose of coordinating the partnerships among the different stakeholders, whether technical or financial, involved in the implementation of TVET policies. The different partners involved in the IATT are the ILO, UNDP, United Nations Industrial Development Organisation (UNIDO), UNESCO-BREDA and the International Centre for Technical and Vocational Education and Training of UNESCO (UNEVOC). Additional organisations were then invited to join, including African

Development Bank (ADB) and ADEA, and two IATT workshops took place in Dakar in April and December 2010. A third workshop took place in Abuja at the beginning of April 2011.

4.6 Recognising non-formal and informal learning

62. Oualifications frameworks have promised much since first introduced in the 1990s. While it is apparent that not all these promises can be fulfilled (McBride & Keevy 2010), the promise of the recognition of learning that takes place outside of the formal system remains a high priority. In the African context this becomes even more important as traditional and indigenous knowledges are automatically classified as non-formal and informal learning due to the lack of recognition in the formal nqf system. This dilemma is located at the core of the overall focus of this study and raises the question whether the current form of nqfs that are being introduced in African countries are in fact incompatible with the African context? As will be shown in later parts of this report, and specifically drawing on the three case studies, it is our view that this is not the case. In this regard Faure's (1972 in Naudé 2011) notion of a learning (Western) society organised around the concepts of vertical integration, horizontal integration and democratisation of education systems provides a useful and simple framework through which to view learning across formal and non-formal spaces. Faure's model clearly illustrates the different dimensions of learning, including the notion that lifelong learning takes place throughout life. The difficulty with this concept, while obviously compatible with the Western view of education and also the existing nqf model, is that learning is necessarily regarded as formal (that is, part of the ngf) or non-formal (outside of the ngf). This exclusionary approach creates many difficulties in the African context and contributes to the hegemony of a model that byand-large disregards knowledges that cannot be classified according to this schema. The extent to which relevance, usefulness and upliftment can be accommodated cannot be factored in, and as a result the model limits the expression of Africa's own preoccupations.



Figure 1: Faure's notion of a learning society

63. A less critical voice also comes to the fore when the recognition of non-formal and informal learning is considered in the African context. The voice is exemplified by an earlier ADEA study conducted by McKay and Romm (2006), who argue that lifelong learning and its implementation as an organising principle is contingent upon the establishment of nqfs. They emphasise that learning acquired non-formally should be located within nqfs to ensure the validation, accreditation and certification of non-formal learning to access opportunities for further learning:

...changes in the global social fabric have made it necessary for adult learners to move beyond the mere communal validation of knowledge to a more public and national system of validation in order for people *inter alia* to access opportunities for learning and further development (2006: 7).

64. Key recommendations from the McKay and Romm study include the following:

- The practical application of the nqf. It is not easy to apply recognition of prior learning (RPL) at any degree of scale. If the system is to be fully implemented, ways of accrediting and validating learning will need to be established. For systems of lifelong learning to be effective, the systems for recognising and accrediting learning will need to be in place.
- Public awareness and advocacy campaigns should be aimed at all levels of learners (including basic learners) and should stress the benefits of the nqf.
- Capacity building should continue to enhance national and regional capacity for the development of new qualifications frameworks and systems for skills recognition in prior learning.
- Regional cooperation is essential. Countries in the region will need to look to each other for help and cooperation in this regard. For example, the establishment of a national learners' database of learning records is not possible for all countries, and shortcuts, using and adapting systems from elsewhere, should be considered. There is a need for greater sharing of information and best practices developments at a regional and a continental level for the harmonisation and articulation of regional qualification frameworks once countries have developed their nqfs.
- This process of implementing an nqf needs to happen irrespective of whether countries have adopted strategies that involve the review of the existing qualifications base or whether countries, for example South Africa and Namibia, have used the nqf not as a rearrangement and/or re-collation of existing qualifications, but as a tool for social justice which necessitated a transformation of the entire education and training system.

65. This voice of reason exemplified by McKay and Romm is a common trend in literature on colonial influences in Africa. Even Bassey (1999) in another ADEA supported study that includes a strong critique of the negative impact of colonisation, suggests that conditions that will restrict educational opportunities for African students should be avoided (see Part 6 of this report). Hence the dilemma for African countries: their educational systems have been corrupted by the colonial influences and as a result devalue learning that is uniquely African. Yet, Africa has no choice: in order to participate on the global stage it is necessary for the African system to be compatible with those of the West. This does not mean, however, that Africa should uncritically accept nqfs as a continuation (or even new form) of colonisation. As Africa rethinks learning beyond the confines of Eurocentric concepts and categories it may be possible to develop new forms of nqfs that are better suited to the African context, and that are still compatible with the current dominant Anglo-Saxon and French traditions:

...African countries stand to benefit from the development of qualifications frameworks, but only when qualifications frameworks are developed as distinctive African knowledge systems that consider the construction of knowledge in the light of the unfolding African experience, the confirmation of distinctions between academic and vocational systems, and the overt attempts at shifting the control of vocational education away from providers to employers. African countries that embrace humaneness in the development of people and find an own African identity, will be able to contribute to the active deconstruction of the colonial discourse wherein also qualifications frameworks have become embedded, even if this requires the integration of indigenous and Western worldviews (Higgs and Keevy 2009: 700).

5 AFRICAN CASE STUDIES

5.1 Introduction

66. In order to engage effectively with the contribution of nqfs to sustainability in Africa, it is important to take into account that nqfs have been influenced by Anglo-Saxon and French traditions, while the very contexts wherein they are being implemented have been affected by Anglo-Saxon and French colonisation. Under ideal conditions it should be possible to develop an nqf for any African country with an education system suited to that country. Of course this is not the case, and in order for nqfs to be sustainable in Africa the challenge has to be approached much more pragmatically.

67. Three countries were chosen for this study:

- South Africa, with its well established first generation nqf and having been influenced by the Dutch since 1652 and the English since 1897.
- Mauritius, also with an existing nqf, but one which is less advanced and as a country that has been influenced by both the French in the 1770s and the British since the 1800s.
- Senegal, as a country that has started to move in the direction of an nqf as recently as 2008 and that was subjected to French domination since 1659

68. The three case studies provide valuable insights into nqf development albeit in very different circumstances on the African continent and are complemented by brief observations from Ghana, Mozambique and also Germany, which was included due to the strong influence of the dual system approach in Africa. The intention of the study was to provide an opportunity for all African nations to participate, although only a few were able to do so due to the constraints resulting from the timelines required to meet the ADEA Triennale deadlines.

69. The three case studies are presented hereunder. Each case study includes a brief overview of the country's historical context, the events leading up to the development and implementation of its nqf, as well as some reflections and lessons learnt during the process.

5.2 South Africa

Population	49.3 million (2009)
Adult literacy rate ¹	89% (2007)
Net primary enrolment ²	85% (2009)
Net secondary enrolment ³	72% (2007)
Out of school youth ⁴	41.6% (2007)
Net official development assistance and official aid received ⁵	USD 1,075 million (2009)

¹ Adult literacy rate is the percentage of people ages 15 and above who can, with understanding, read and write a short, simple statement on their everyday life.

² Net primary enrolment refers to the ratio of children of official school age who are enrolled in school to the population of the corresponding official school age.

³ Net secondary enrolment refers to the ratio of children of official school age who are enrolled in school to the population of the corresponding official school age.

⁴ Out of school youth refers to 15-24 year olds as % of the total youth population (in the case of South Africa the data is for 18-24 year olds)

⁵ Net official development assistance (ODA) consists of disbursements of loans made on concessional terms (net of repayments of principal) and grants by official agencies of the members of the Development Assistance Committee (DAC), by multilateral institutions, and by non-DAC countries to promote economic development and welfare in countries and territories in the DAC list of ODA recipients. It includes loans with a grant element of at least 25 percent (calculated at a rate of discount of 10 percent). Net

Unemployment ⁶	23.8% (2009)	
Prevalence of HIV ⁷	18% (2009)	
Fixed broadband Internet subscribers ⁸	0.98 per 100 people (2009)	

Table 1: Country overview South Africa (USAID 2010, World Development Indicators, UNESCO Institute for Statistics, data accessed April 2011)

70. The following is a summary of a case study on the South African nqf. The complete case study is attached as Annexure 1.

71. The South African education and training system is founded on an Anglo-Saxon model originating from the influential colonial era that existed in South Africa between 1652 and the end of the nineteenth century. The first Western school was opened in the Cape in 1658 to teach the Dutch language. By 1685 schools became segregated based on class and sex, marking the early roots of the race-based segregation followed in later years by the theory of separate development under British rule, notably advocated by Lord Milner the High Commissioner for South Africa between 1897 and 1905. A purposive inferior funding regime for African education followed under the self-governing Union of South Africa in 1910, and complete segregation was enforced under the Christian National Education policy of the Nationalist Government in 1948. From 1953 the State assumed control of the black educational system, formerly in the hands of the missionaries, through its policy on Bantu Education in 1954, and mainly to provide mass African labour with the minimum skills necessary for participation in semi-skilled positions in the forced labour economy. Trade unions attempted to circumvent the State hegemony by establishing their own schools and demanding improved working conditions, while cultural clubs and home education programmes were encouraged by the African National Congress, churches and the Congress of Democrats (Hlatshwayo 2000).

72. Up until recently, and as late as 1994, the South African education and training system benefitted mainly the white population through unequal development of schools and universities reserved for this minority. While significant progress has been made since 1994 to address past imbalances, notably through the development and implementation of the South African National Qualifications Framework (sanqf), much still remains to be done. While the new system has attempted to bring greater parity between different institutional types, it has failed to increase access to post-school education and training (Keevy 2010). With the significant focus on transformation, the reliance on artisan-type training which existed before 1994 was gradually eroded to the point that radical intervention is now required to reinforce occupational provisioning in the country. Several initiatives are currently underway to revitalise the sector and develop occupationally directed qualifications with explicit workplace experience components.

73. The sanqf was formally established in October 1995 through the promulgation of the South African Qualifications Authority (SAQA) Act by the first democratically elected post-apartheid government. The sanqf was designed as an integrated system with a strong transformational agenda to encourage lifelong learning (SAQA 2001). Preceding the SAQA Act a broad and extensive consultation process took place that had its roots in the labour movement's desire to recognise the tradable skills of black workers in the bargaining forums for better conditions of service in the late 1980s. Strongly influenced by the effects of increasing globalisation and the assumption that work places would be post-Fordist, a series of investigations were initiated under the broader ambit of the

official aid refers to aid flows (net of repayments) from official donors to countries and territories in part II of the DAC list of recipients: more advanced countries of Central and Eastern Europe, the countries of the former Soviet Union, and certain advanced developing countries and territories. Official aid is provided under terms and conditions similar to those for ODA. Part II of the DAC List was abolished in 2005. The collection of data on official aid and other resource flows to Part II countries ended with 2004 data.

⁶ Unemployment refers to the share of the labour force that is without work but available for and seeking employment. Definitions of labour force and unemployment differ by country.

⁷ Prevalence of HIV refers to the percentage of people ages 15-49 who are infected with HIV.

⁸ Fixed broadband Internet subscribers are the number of broadband subscribers with a digital subscriber line, cable modem, or other high-speed technology.

incumbent African National Congress's policy development initiatives. As part of the investigations, education and training systems in a number of Commonwealth countries were scrutinised. A common trend towards national standards and flexible pathways was evident at the time. The Australian model, also with strong trade union influences, was particularly attractive to the labour constituency, while the New Zealand model was preferred by organised business. The emerging English model of National Vocational Qualifications was less attractive and perceived as compromised with strong Thatcherite pressures towards privatising education and training provisioning. The Congress of South African Trade Unions (COSATU) continued to champion the move towards a sanqf during the early 1990s and continued to harness support through an inclusive and participatory approach (French 2008).

74. South Africa, as a member State of the Southern African Development Community (SADC), has played an active role in the development of a regional qualifications framework for SADC since 2001 (SADC 2005). Progress has, however, been slow and impeded as a result of the lack of trust between member States, mainly as a result of the diversity of the education and training systems and the varying levels of development between countries. The dominance of the Anglophone countries in the region, directly as a result of the fact that the emerging nqf approach originated mainly in the Anglo-Saxon world (UK, Scotland, Australia and New Zealand) were better suited to Anglophone member States, and less so to the Franco- and Lucophone member States (Keevy *et al* 2011). As a result of South Africa's involvement in the region, and also the move towards nqfs in other SADC member States, concerns have also been raised about the extent to which the sanqf is being exported into SADC and the rest of Africa (Chisholm 2007).

75. It is apparent that the South African education and training system has been impacted upon by external influences over the last 350 years. Ranging from the early colonial attempts to 'educate' the native population to the ever-deepening segregation that became increasingly embedded within the system; the need for mass manual labour, and eventually to the emancipation of the disadvantaged with the end of apartheid in 1994; and the subsequent introduction of the sanqf in the aftermath of apartheid, the end-result is a system under duress. As noted by Malherbe more than 80 years ago:

There is perhaps no country in the world where the educational system has had so many buffetings and tampering from without as the education system of South Africa. At no period was education to any extent the spontaneous expression of the ethos, or genius of the people. To a very large extent...[South Africa's] educational system has been the result of successive superimpositions of systems or bits of systems from without (Malherbe 1925 in Hlatswayo 2000: 47).

5.3 Mauritius

Population	1.3 million (2009)
Adult literacy rate	88% (2009)
Net primary enrolment	94% (2009)
Net secondary enrolment	69% (2010)
Out of school youth	Not available
Net official development assistance and official aid received	USD 155 million (2009)
Unemployment	7.3% (2009)
Prevalence of HIV	1% (2009)
Fixed broadband Internet subscribers	7.25 per 100 people (2009)

Table 2: Country overview Mauritius (USAID 2010, World Development Indicators, UNESCO Institute for Statistics, Mauritius Ministry of Finance and Economic Development, data accessed April 2011)

76. The following is a summary of a case study on the Mauritian nqf. The complete case study is attached as Annexure 2.

77. Mauritius has a rich and diversified history having undergone various regimes starting from the brief settlement of the Dutch in the 17th century followed by the French and British rule and lastly, the influx of indentured labourers from India, China and Africa. All these contributed to the moulding of the Island's foundation, accounting for its present blend of cultures. It is within this opus that the Mauritian education finds its root, a system which is marked by colonialism and the influences of French and British education systems.

78. With the centuries that passed, the Mauritian education system underwent many radical changes, yet both the French and British influences are still very much present within its current system. So much so, that it has been described as being governed by a system of dual control. To this effect, despite having evolved within an Anglican system where School Certificates and Higher School Certificates awarded by University of Cambridge International Examination are part of the official pathway of Mauritian education, French qualifications such as Baccalauréat Général or Brevet de Technicien Supérieure are still privileged and nationally recognised, albeit the fact that most of the French institutions are mainly private and fee-paying. This duality is again felt within the legal framework where the Code Napoleon forms an important part of the Mauritian legal system but with a strong overlap of English Law modified by local enactments. The LLB curriculum at the University of Mauritius clearly exemplifies the above. The dualism which pervades the Mauritian system can be traced back to the Capitulation Treaty of 1810 when the British took over the island from the French. In the Act of Capitulation, the British guaranteed that they would respect the language, the customs, the laws and the traditions of the French settlers. Over the years Mauritius has developed its own identity. Today, Oriental Languages are part of both Primary and Secondary education. Such factors have helped to create a hybrid education system which is unique to Mauritius.

79. However, the 20th Century also brought along a disarray of qualifications, whereby several private and public institutions were seen to offer British qualifications emanating from different sources which caused prejudice to the Mauritian education system. The need for reform led to the creation of the Mauritius Qualifications Authority (MQA) and the subsequent implementation of the Mauritian nqf (mnqf) which aimed at creating an integrated national framework for learning achievements and to facilitate access to, and mobility and progression within education, training and career paths. It also meant enhancement of the quality of education and training and as such acceleration of training and employment opportunities.

80. The framework has not only established order within the Mauritian education system but consolidated the merger between Mauritian, French and British qualifications by bringing them together under one umbrella. Today, French, English and Mauritian qualifications co-exist on the mnqf which simultaneously serves to establish Recognition and Equivalence of qualifications. For instance, the *Baccalauréat Général* is pitched at level 5 of the nqf which is of comparable level to the Cambridge awarded HSC, GCE 'A' Level or the Level 5 National Certificates awarded by local awarding bodies.

81. Under the mandate of MQA, the mnqf enabled the development of National Certificates and National Diplomas nonetheless these still manifest the resonance of both the French and British systems. Thus whilst the qualifications developed are 'fit for purpose' and compliant to the expectations of the industry, they have to meet international standards. This is achieved through the credit system, a system which in essence fosters the island's Anglo-Saxon and French heritage.

5.4 Senegal

Population	12,5 million (2009)
Adult literacy rate	50% (2009)
Net primary enrolment	73% (2009)
Net secondary enrolment	21% (2006)
Out of school youth	74.3% (2005)
Net official development assistance and official aid	USD 1,017 million (2009)
received	
Unemployment	10% (2006)
Prevalence of HIV	1% (2009)
Fixed broadband Internet subscribers	0.47 per 100 people (2009)

Table 3: Country overview of Senegal (USAID 2010, World Development Indicators, UNESCO Institute for Statistics, data accessed April 2011)

82. The following is a summary of a case study on the Senegalese nqf. The complete case study is attached as Annexure 3.

83. The development of the proposed Senegalese nqf (snqf) started in 2009. An early draft was first considered in 2008 with the introduction of a Homologation Commission in order to regulate non-official training and private schools. The international movement supported by main international and African institutions has driven this initiative towards an nqf with the idea to forecast an eventual RQF giving recognition of qualifications in case of mobility.

84. A working group was set up in Senegal in November 2009 responsible to the Ministry in charge of TVET and managed by the (Director of Planning and Reform) (DPRE). A first mapping was made with the help of an international expert and the support of UNESCO-BREDA. A workshop realised in January 2010 developed the main components related to qualifications development based on the following considerations:

- Senegal has structured its qualifications systems on the basis of the French approach with real sustainability since 1960.
- An important reform was made in 2005 in order to provide more appropriate standards and curricula for TVET, using the APC method (*Approche par competences*).
- An important investment was done to address the problem of illiteracy using the same method.
- Senegal has developed a very interesting approach through allowing applicants coming from non-formal and informal learning to pass official examinations and obtain official qualifications.

85. TVET and regulation of non-formal and informal learning were the main challenges to the implementation of an nqf in Senegal. Qualifications systems are designed to provide learning outcomes descriptions and also to permit non-formal and informal learning recognition. The main strength of the systems is its structure with five levels for TVET and the articulation with the Bologna process for Higher Education in Europe. The levels structure, directly issued from the French levels grid, classifies the content of qualifications related to a whole occupation (and not to courses) giving a legibility for the labour market. The weakness of the systems is related to the qualifications contents which are not appropriated to the Senegalese context but thanks to the reform and the new design method could be more convenient in the future.

86. The French influence, as the tradition of West Africa, means that governance and development of the nqf must be under the empowerment of the State, i.e. overseen by a ministry and not under the responsibility of an external agency. The designation of a coordinator seems to be decided but it is not so sure that DPRE could be recognised by the other initiatives related to the education and training systems. Quality assurance exists but it is different according to each qualification system and the rules are not always explicit.

87. Broadly speaking it can be said that Senegal has an implicit nqf based on a French approach. This could form the basis for further developments required, although this will require reconsideration of the content and values which have to be supported to provide qualified citizens in the country and to be recognised internationally.

5.5 Other contributions from within the ADEA community

5.5.1 Ghana

88. According to a recent NUFFIC report (Gondwe & Walenkamp 2011) the overall perception in Ghana is that the education and training being offered in the country is not adequate for the needs of the labour market. They note that Ghanaian academics agree that the correct emphasis has not been placed on the development of human resources, particularly in the sciences. There is also agreement that this situation is a direct result of the historical legacy of the education sector:

The lack of practical and relevant skills that employers are noticing in their employees can also partly be explained by the educational attainment level of the majority of the employed labour force (>90%) who have less than a secondary education. Our hypothesis is that even if the 9.4% of graduates who enter the labour force from secondary and higher education institutions were perfectly aligned and suited to the requirements of the labour market, the labour market would still have a problem since at least 90% of the workforce would still not have passed through the education system at an advanced enough level, or at all, to benefit from the improvements. (Gondwe & Walenkamp 2011: 41)

89. In a development that is viewed with great expectations, the Council for Technical and Vocational Education and Training (COTVET) and the Japanese International Cooperation Agency (JICA) are currently working together on the introduction of the demand-oriented competence-based training approach into TVET, which should further align the education on offer with the needs of the labour market. Analysis of the curricula on offer at higher education institutions shows that in most instances alignment exists between the education programmes on offer and the type of skilled personnel that the government needs in order to achieve its strategic goal of Ghana being driven by a strong agro-based industrial economy. The disciplines of the training programmes on offer at professional education institutions correspond to the disciplines in which the labour market requires skilled personnel. However, apparently the links with the labour market are too weak to make the programmes relevant to specific applications and practices in the labour market. Structural incorporation of creative and innovative skills acquisition elements into these programmes would increase student capabilities in translating the theoretical knowledge gained in a specific programme to a wide variety of problems, situations and contexts. Furthermore, career guidance, in conjunction with the labour market, could receive more emphasis in the training so that students can have a better vision of the various contexts in which they can apply their academic knowledge upon graduation (*Ibid.*). It is within this context that exploratory work is currently underway to establish a qualifications framework for TVET in Ghana.

5.5.2 Mozambique

90. The development of formal education in Mozambique under the Portuguese colonial domination was very slow and characterised by its discriminatory nature. This became evident when the Portuguese Colonial Government published the Missionary Statute in which it confirmed a separation of Africans and Europeans in Education access by creating two different systems: one reserved for white children and a minority of black children whose parents have gained the so called 'assimilated' status. This system of education was provided by the State and private institutions. The second system was designed for the majority of the population and was offered by religious organisations mainly by Catholic Missions covering only the very basic levels of General and

Vocational Training. It is worth noting that at the time of independence (1975), over 90% of the Mozambican population was illiterate. In 1993, the government of Mozambique introduced a new National System of Education bringing about a total break with the colonial system whose aims are three-fold: (i) to eradicate illiteracy (ii) to provide free compulsory basic education of seven years of schooling (iii) to train qualified manpower to meet the needs of economic and social development of the country.

91. Mozambique does not yet have a complete nqf that covers all the subsystems. However, as part of the Integrated Programme for the Reform of Technical and Vocational Education and Training (PIREP) which has being undertaken in the country since 2007, an important step was taken in that direction, which has resulted in the design and approval of the National Vocational Qualifications Framework (NVQF) for the Technical and Vocational Education Subsystem. The NVQF has been developed with the focus on the recognition and registration of, and the relationships between, the various technical and vocational Education, under the Ministry of Education) and INEFP (National Institute of Employment and Vocational Training, under the Ministry of Labour) courses.

92. The main objective of the present NVQF is to maximise the use of qualifications for a variety of purposes, ranging from preparing people for immediate employment to accessing longer term training opportunities. Therefore it is argued that education and training provision must be made more flexible, so that people can enter and leave the formal education and training system at different times in their lives. It must help workers to plan their next step on the career ladder, to identify and access entry and exit points, and to provide a facilitating transfer and progression system to give learners various options and pathways of learning leading to subsequent qualifications. Concepts such as credit systems and recognition of prior learning (RPL) assume greater importance given this context.

5.5.3 Germany

93. The German Qualifications Framework (GQF) is still work in process and has yet to move beyond the proposal stage. Key actors in the decision-making on the GQF are the Ministry of Education and Research (responsible for TVET in companies based on the Vocational Training Act and overarching questions) and the *Kultusministerkonferenz* (Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in the Federal Republic of Germany [*KMK*]). Representatives from these authorities form the so-called *Bund-Länder-Koordinierungsgruppe* (Federal Coordination Group) and are setting the agenda for the *Nationale Arbeitskreis Deutscher Qualifikationsrahmen* (National Working Group German Qualifications Framework). This group has been designing the draft framework and will also be the decision making body for the EQF referencing report.

94. high-level representatives from А conference with the States governments (Amtschefkonferenz) is planned for 2011 where major questions concerning the further development of the GQF will be addressed (for example referencing of all qualifications of the German education system). Hence, the referencing work to the GQF has been postponed until spring 2011. The final GQF proposal and decision is expected for 2011. At the current stage of the development some of the German stakeholders are stressing the transnational mobility purpose of the GQF/EQF and playing down the lifelong learning purpose. The GQF/EQF should first and foremost be used as a transparency instrument. The GQF-Matrix has been adjusted (see the proposal for a German Qualifications Framework, November 2010, www.deutscherqualifikationsrahmen.de). A major change concerns the term self-competence used in the GQF. The GQF proposal differentiates now between two categories of competence. These are professional competence, subdivided into knowledge and skills and personal competence, subdivided into social competence and autonomy (Selbständigkeit). The issue of implementation remains to be clarified. It could be a treaty or an accord between federal government and 16 State governments in case of any rights and duties (including financial) or a joint agreement by all stakeholders with no individual rights.

6 CONSIDERATION FOR SUSTAINABLE DEVELOPMENT OF QUALIFICATIONS FRAMEWORKS IN AFRICA

6.1 Introduction

95. This final part of the research report locates the findings emanating from the case studies within the conceptual framework developed in this report. It focuses on the extent to which nqfs developed in the Anglo-Saxon and French traditions are suitable for Africa, more specifically, the influences of each tradition that may be appropriate or not. The overarching theme is that of sustainability understood as dealing with the wellbeing of the environment, society and economy, and the promotion of lifelong learning. The extent to which nqfs in Africa can be locally relevant, culturally appropriate, and based on African needs, perceptions and conditions is foregrounded. Importantly, the contribution of nqfs to sustainability is viewed as closely interrelated with the need for Africa to learn and define its own qualifications values, rather than to borrow policies from countries and regions that have already developed qualifications frameworks. In this regard the position is taken that in order for ngfs to contribute to sustainable development an unfettered diffusion from more advanced countries and regions will not suffice. It is posited that nqfs must become the expression of Africa's own preoccupations in order to contribute to sustainable development, but that this position cannot be unconditional as it is influenced by several pragmatic considerations, not least the global context that requires a common language to facilitate cross-border recognition and comparability of qualifications, also within, from and to Africa.

6.2 Cross-cutting observations

Country	South Africa	Mauritius	Senegal
Population	49.3 million	1.3 million (2009)	12,5 million
	(2009)		(2009)
Adult literacy rate	89% (2007)	88% (2009)	50% (2009)
Net primary enrolment	85% (2009)	94% (2009)	73% (2009)
Net secondary enrolment	72% (2007)	69% (2010)	21% (2006)
Out of school youth	41.6% (2007)	Not available	74.3% (2005)
Net official development assistance and	USD 1,075million	USD 155 million	USD 1,017
official aid received	(2009)	(2009)	million
			(2009)
Unemployment	23.8% (2009)	7.3% (2009)	10% (2006)
Prevalence of HIV	18% (2009)	1% (2009)	1% (2009)
Fixed broadband Internet subscribers	0.98 per 100	7.25 per 100	0.47 per 100
	people (2009)	people (2009)	people (2009)

Table 4: Overview of country data across the three case studies (sources and other details indicated in case studies)

96. It is apparent from the overview of country data across the three case studies of South Africa, Mauritius and Senegal, that the three countries are vastly different, not only in size and colonial

influences, but also in terms of unemployment, HIV prevalence and school enrolments. The high levels of out-of-school youth in South Africa (41.6%) and Senegal (74.3%) (no data was available for Mauritius) is particularly concerning and constitute an important focus area for these governments if they are serious about sustainable development.

97. Despite the various differences, all three countries are actively involved in nqf development. The education systems in all the countries have been strongly influenced by Anglo-Saxon (South Africa and Mauritius) and French (Senegal and Mauritius) traditions as a result of colonisation, while the type of nqfs being introduced have likewise been influenced by the countries from which the nqfs originate, namely the United Kingdom, Australia, New Zealand and France. This potential 'double-impact', historically on education systems as a result of colonisation, and more recently as a result of developing an nqf, on African countries has the potential to create several problems within the country that the nqf is being developed for. At the most extreme the development of nqfs can be viewed as a continuation, or even new form, of colonisation that will make sure Africa remains unable to effectively participate on the global stage as Africa continues to be forced to adhere to rules that are foreign to the continent. A less extreme and more pragmatic view suggests that in order to compete internationally, African countries have no choice but to follow the global trend, but should do so with caution in order to make their nqfs sustainable and located within the realities of the African context.

98. Following Raffe (2009), it is useful to conceptualise nqfs in more dynamic terms by focusing on differences and common features across different contexts. The summary below attempts to outline the differences and commonalities between the approaches to nqf development across the three case studies by focusing on the following key areas:

- use of common terminology.
- different approaches to governance.
- sectoral approaches to nqf development.
- interrelationship between different types of qualifications frameworks.
- the importance of advocacy and communication.
- the quest for evidence.
- social uses of qualifications.
- transcending the colonial legacies to make education more sustainable.

6.2.1 Common terminology with different meanings

99. The use of the term 'qualification' differs across the Anglo-Saxon and French traditions. In the English context the terms qualification and certification are closely interrelated, while in the French, the different terms signal different applications. The English use of qualification (noun) can be summarised as referring to a condition or standard that must be complied with, and which is captured as an official record or document (such as a degree, certificate, or diploma) and that includes a description of the course of study in order for it to be disseminated through a repository. When a qualification (noun) is awarded to an individual, qualification is used for the official document attesting or recording the particular fact or event, level of achievement, and the indication of completion of the course of study or training by the individual, while the process of awarding the qualification is referred to as certification. These different English applications can best be illustrated through the following examples:

- The Bachelor in Education *qualification* is registered on the South African nqf.
- The student was awarded the Bachelor in Education *qualification* by the University of South Africa after successfully completing the four-year study programme.

100. In the French context the English use of 'qualification' is replaced by terms that reflect the specific application. The French word "qualification" is used to classify workers, while the English concept of "qualification" is translated into French with the word "certification" which is used as proxy for different types of qualifications (*Diplôme, Certificat, Licence, Baccalauréat*, etc.) that can

be registered on an nqf, just as the case with the English application. The term 'certification' (noun) is, however, preferred for the recognition of the achievements of individuals avoiding the English use of the same term for the two different applications.

101. Closely related to the different applications of the terms 'qualification' and 'certification' are the terms 'competence' and 'outcomes' as is evident not only across the Anglo-Saxon and French traditions, but also in the case of the German nqf. Here it is important to note that in particular, the limitations of the use of the concept of 'competence' lies at the heart of outcomes approaches and nqfs (Oates 2004). The overarching point, however, is that terminology related to qualifications frameworks may appear to be common across different traditions, but in fact, understandings remain very contextual and as a result, the same terms may have very different meanings.

102. The interpretation of the concept of qualifications frameworks is more similar than may be expected across the Anglo-Saxon and French traditions. This commonality is mainly due to the fact that the original qualifications framework developments took place in Anglo-Saxon countries and were only followed by the French some years later. Although France had a framework to classify qualifications as early as 1969, the French nqf itself has been significantly influenced by the experiences in the Anglo-Saxon world as noted by Bouder (2003: 347):

For the last ten years European and international debates on qualifications have been strongly focused on discussing the importance and the design of frameworks. The main drive in this kind of discussion has come from Britain, which has been in the process of remodelling its own system into a national one; in this process British qualification designers have discovered the value of a qualification framework as a supporting tool for those who provide and use qualifications.

103. In general nqfs developed in the Anglo-Saxon tradition are developed at the level of the learning system, while nqfs developed in the French tradition are located at the level of the application of learning outcomes for labour organisations. At a broad level a qualifications framework is viewed as an instrument for the development and classification of qualifications. Across the two traditions, qualifications frameworks establish a basis for improving quality, accessibility, linkages and public or labour market recognition of qualifications within a country or internationally. More recent developments in Anglo-Saxon countries, specifically South Africa, emphasise the dynamic and evolving nature of nqfs, as the frameworks are increasingly being understood as frameworks of communication and collaboration.

In France the Training Domains Classification (Nomenclature des spe cialite's de formation) 104. set up in 1994 is used as a descriptor of a qualification related to "any education or training outcome regardless of its level, its preparation route, its field of application or its social use" (Bouder 2003: 351). Two important and ongoing features of the TVET French system since 1969 were establishing a close relationship between the content of work and the content of education and training curricula, and since the beginning of the 1990's a differentiation between the assessment process and the learning one in the design of qualifications. The classification of qualifications by levels in France, including the correspondence between qualifications and occupations, was an important part of the Higher education reforms which also attempted to provide social legitimacy through a State guarantee in instances where courses would otherwise carry less value than the assessment process to get national diplomas (*Ibid*.). This explains the reason why the non-formal and informal learning outcomes validation and recognition could be developed and permitted to get the same qualification awards as formal learning. The French move towards closer alignment between qualifications and occupations is also evident in some Anglo-Saxon influenced developments, particularly South Africa that has recently moved towards the establishment of the sub-framework of the sange for trades and occupations. The attempts to increase social legitimacy achieved through reforms, such as through nqfs, is another important point that must be considered when nqfs are developed across both Anglo-Saxon and French traditions.

105. A trend across both Anglo-Saxon and French influenced systems has been the new forms and divisions brought about by globalisation. This distinction between academic and vocational systems has emerged contrary to earlier expectations of a blurring of the boundaries which early nqfs were

modelled on. The 'unifying' nqfs, such as the early developments in the South African nqf, had to adapt to the accentuated divisions.

6.2.2 Different approaches to governance

106. The governance of education and training differs across the two traditions. In the Anglo-Saxon case, there has been a strong preference for an *agency* approach where an arms-length body is established to oversee nqf development. These agencies are fully or partly funded by governments, but are given considerable independence in the way that they go about their business. In the case of the French (and Senegalese) approach, active State participation in education is maintained through a highly centralised, legislated and bureaucratic approach. Private sector is allowed for training but qualifications delivered at the end of the curriculum are the national official one, or the qualification will never be recognised and used as an official social signal. The national and official character is as a result of the organisation of assessment by the State authorities, as well as the accreditation role of the *Conservatoire National des Arts et Métiers* (CNCP). Unlike the Anglo-Saxon model, the creation of an independent body to coordinate activities across different ministries is unlikely. In this regard it is also important to note that some former French colonies in Africa have become locked on to a technocratic system like the early French one, while France itself has evolved to allow a range of authorities in charge of qualifications and recognition of non-formal and informal learning outcomes.

107. The involvement of social partners, including also professional associations, is a key feature of nqfs developed in the Anglo-Saxon tradition. This approach is the same in the French tradition but more difficult to apply mainly due to the low level of organisation of the representatives of the labour market in most of the environments wherein nqfs are developed. As noted by Isaacs (2010) nqfs cannot be regarded as purely technical instruments that can be implemented in an overly bureaucratic and technicist manner, but should rely on shared meaning and understanding, that can only be achieved through active stakeholder and role-player participation, and conscious joint building of common understandings.

108. The need for the development of information management systems as integral to the nqf is common across all three case studies. In this regard only South Africa has a fully functional system, while both Mauritius and Senegal have signalled the importance of such an instrument. The challenges associated with the development and maintenance of a national database should however be recognised.

109. Despite the different approaches to governance as illustrated above, both Anglo-Saxon and French influenced countries are developing nqfs through legislative processes.

It appears that many of these developments do bring the French system closer to the Anglo-Saxon notion of a national qualifications framework. The very first draft of the Law certainly intended to set up such a framework, in the sense of creating a superstructure into which all qualifications would have to be squeezed. There are also parallels with the [A]nglophone model in that the Law gives the State a powerful tool to organise the qualification 'market' (Bouder, 2003: 356).

110. In the Anglo-Saxon influenced cases (such as Mauritius and South Africa), the legislation may be regarded as more open-ended in that it provides the basic principles for institutional development, while in the French-influenced case (as is being considered in Senegal) the legislation is much more direct, specifying precisely what institutions are bound to do.

6.2.3 Sectoral approaches to nqf development

111. Qualifications framework development within a country can take place in at least three different ways. The first is to start with a sectoral level framework, such as TVET, higher education, or even within a specific economic sector, which is then followed by a broader national process. The second option is to prioritise the development of the national qualifications framework, which is then

followed by sector-specific interventions. A third option, usually exercised in smaller countries, is to develop only a national qualifications framework. Senegal and Ghana are examples of countries that have started with a focus on TVET and are now gradually moving towards nqfs. South Africa is an example of a country that started with an nqf, and subsequently developed three sub-frameworks. Mauritius is an example of a smaller country that has developed only an nqf.

112. The relationship between TVET reforms and nqf developments is noted across the case studies. Senegal is a case in point, where the initiative to establish an nqf is embedded in the national policy to reform TVET. This is an important point that needs careful consideration as the foregrounding of TVET can have many unintended consequences, notably an over-emphasis on competency-based approaches and unitisation that are in the majority of cases, not compatible with higher education, but on the more positive side a discussion on nqfs can steer and guide national reforms even if the immediate intention is not to introduce an nqf:

Reforming education and training systems in countries facing systemic reform needs, implies combining old and new knowledge in rapidly changing contexts for both local stakeholders and international advisers (Grootings 2007: 19).

113. Countries may also benefit greatly from first developing TVET qualifications frameworks which are later further developed into nqfs. In this regard it is important to note that a similar benefit has been identified by Keevy *et al* (2011), in this case for regional qualifications frameworks:

The significant impact of a preceding sectoral framework, such as through Bologna for higher education in the EU, in facilitating the implementation of a transnational qualifications framework is emphasised both within the EU context, and externally by key role-players involved in similar developments internationally (Keevy *et al* 2011: 12).

114. While all three approaches to qualifications framework development have advantages and disadvantages, it is becoming increasingly evident that many countries across Africa are benefitting from developing an initial TVET qualifications framework before proceeding with full nqf implementation. An important risk that must be mitigated in this approach is the potential accentuation of divisions between academic and vocational systems.

6.2.4 The interrelationship between different qualifications frameworks

115. The development of regional qualifications frameworks are increasingly impacting on the manner in which nqfs are developed. In Africa two regional qualifications frameworks are being developed. The Southern African Development Community Regional Qualifications Framework (SADC RQF) has been under development since 1997 (see SADC 2005) and includes both South Africa and Mauritius. A regional framework for ECOWAS is currently being considered (see Charraud and Werquin 2010) and includes Senegal. COMESA has also indicated an interest in a similar development.

116. The interrelationship between nqfs and regional qualifications frameworks takes place on a number of levels as noted in the recent report on transnational qualifications frameworks compiled by the European Training Foundation:

What the study seems to show is that the two processes, NQF development and [regional] qualifications framework development, should preferably happen simultaneously as the interplay between the processes is valuable in both directions. The interplay between NQFs and transnational qualification frameworks exists on a number of levels, and influence both the NQFs and the transnational qualification frameworks (Keevy *et al* 2011: 11).

117. The report also finds that the mutual interdependence between regional qualification frameworks and nqfs differ from one region to the next, and is particularly dependent on the level of the nqfs in the particular region. For example, in the European context, where most member States already have functional nqfs at the conceptual stage, a more synchronised and parallel development of

the European Qualifications Framework and nqfs is taking place. In SADC the parallel development of the SADC RQF and nqfs has been particularly problematic. Despite such intentions being expressed, and despite the presence of the already established South African, Namibian and Mauritian nqfs, the SADC RQF process has been slow and fraught with difficulties. In particular, the decision to postpone the development of the SADC RQF in 2005, in favour of prioritising the development of quality assurance systems (as precursors to nqfs) has had a very negative impact on the region (Ibid.).

118. The report also notes that considering the available evidence it is not evident that the prioritisation of nqfs on a regional basis has had any improved impact on the level of nqfs than when the two processes take place in parallel. On the contrary, it is suggested that a parallel approach may benefit both the regional process and increased nqf development within the member States as their involvement in the regional process rather creates more opportunities for peer learning and capacity building that would not have been possible otherwise (Ibid.).

119. Lastly, it is noted that convergence and increased harmonisation is something that will have to be closely monitored in all regional and transnational developments:

The explicit intention of developing a [regional qualifications] framework as a meta or referenceframework encourages member States to align their nqfs to this reference point. While such alignment may initially be limited, more so where a member State has a well-established education and training tradition, there is no doubt that the level of alignment will increase over time to facilitate increased mutual recognition and mobility, even in EU Member States. In countries with less developed education and training systems, such as some countries in SADC, the Caribbean and [Asia], the convergence effect will be even stronger. The extent to which this overall convergence of education and training systems will devalue existing traditions and contribute to a lack of regard for diverse local contexts remains to be seen, but is clearly a risk that will need to be managed (Keevy *et al* 2011: 16).

6.2.5 The need for advocacy and communication

120. Globalisation and acceleration of international trade has accentuated the need for communication and clarity of individual achievement beyond the description of educational systems and content of training programmes. This is a common theme across both traditions and points towards the need for increased emphasis on advocacy and communication related to qualifications framework development. Importantly, this emphasis requires significant resourcing which is often overlooked in favour of more visible operational activities.

6.2.6 The quest for evidence

121. In discussing the SADC RQF, Gunning (2006) makes the point that it is necessary to ask 'real world' questions in order to judge the effectiveness of an nqf. He argues that we need *evidence* that students' learning pathways are made easier to plan using an nqf; *evidence* that students have achieved their next qualification faster and at less cost because they received credit for previous achievement; *evidence* that students completing TVET qualifications have found jobs; *evidence* that fairness and equity in society has been improved by the existence of an nqf; *evidence* that employers' recruitment efforts and skills audits and training plans are more effective through the use of an nqf; *evidence* that a country's economic competitiveness has improved as a result of the development of an nqf. Gunning's plea for evidence is even more important in African countries where evidence is notoriously scarce. Nqfs cannot be developed in a vacuum, and while there are some signs of a gradually developing evidence base in the international context (McBride & Keevy 2010), the jury is still out as has been emphasised in a recent study conducted by the ILO (Allais *et al* 2009):

Analysing impact of any policy is difficult, and in the case of [national qualifications frameworks] it seems to be extra difficult. Nonetheless, if a policy is to be advocated, instituted, and supported, it should be possible to provide some evidence about its usefulness, and the extent to which it is achieving or is likely to achieve its objectives (Allais *et al* 2009: 162).

122. It goes without saying but African countries need to be particularly diligent in sourcing the available data in the local contexts before implementing an nqf, and more so, during and after implementation. In this regard the differences between African French speaking and African English speaking countries cannot be disregarded.

6.2.7 Social uses of qualifications

123. Inherent in all education and training systems worldwide is a discourse, with qualifications at its heart, which can best be characterised as the social uses of qualifications. Classically, qualifications function as an effective discriminator of who is eligible for employment as an indicator of prescribed employment benefits. Qualifications become the arbiter of the 'social goods' (as described by Durkheim & Giddens 1972) for which an aspirant employee is eligible. Given the discursive practices in any one country, the collective bargaining practices and the historical trajectory of the State, a set of employment practices emerge. These practices reflect many different impacts of how qualifications are evaluated, perceived and finally socially valued (Isaacs & Keevy 2009). The social uses of qualifications impact directly on attempts at developing nqfs in Africa. Social valuing, however, remains largely intangible and is currently located beyond the boundaries of the qualifications framework discourse.

124. Qualifications frameworks, particularly regional qualifications, have become a global phenomenon that offers a common international currency through which the recognition of qualifications can be realised. Significantly though, qualifications frameworks are not without problems, and it is essential to be aware of the limitations and continually address these through research and reflection. New understandings of qualifications frameworks as frameworks of communication, coordination and collaboration with more modest ambitions is an important development in this regard. This has been suggested independently by both by Jorgensen, who suggests that qualifications frameworks should be seen as "a new medium of communication (interaction) between the educational system and the employment system" (2008: 5), and by Walters and Isaacs (2009: 25):

NQFs are best understood as works-in-progress and as contestable artefacts of modern society, which can contribute in a modest way to how a society manages the relations between education, training and work by finding 'common ground' between distinct forms of learning and their articulation with work place practices.

6.2.8 Transcending the colonial legacies to make education more sustainable

125. Across the Anglo-Saxon and French traditions sustainable development deals with the wellbeing of the environment, society and economy, and promotes lifelong learning. Emphasis is placed on local relevance, cultural appropriateness, local needs, perceptions and conditions. It is also agreed that in order to promote sustainability, nqfs should engage with non-formal and informal learning. Importantly, sustainability acknowledges that fulfilling local needs often has international consequences. The strong State-driven French approach to the recognition of non-formal and informal learning embedded within the formal system, with assessments available independent of the learning process, provides an important example of a more sustainable model than the more flexible, yet also less successful, approach being followed in Anglo-Saxon countries.

126. A common heritage in Africa as a result of both the Anglo-Saxon and French colonial legacies is the misuse of education to prepare a semi-skilled labour force with minimum skills that would be able to provide the colonial masters with affordable labour in subservient colonies. If not for this purpose education was used to prepare Africans for civil service. These and other factors have significant implications for sustainable development in Africa and the manner in which education systems will be able to transcend the entrenched former approaches.
127. Much has been written about the ambitious nature of nqfs. The three case studies demonstrate that more pragmatic approaches are more sustainable, and that nqfs on their own, are not able to deliver on the wide and far-reaching promises that governments often overburden nqfs with, in effect, setting the nqf up for failure. The phrase used in the South African context that the acronym nqf means 'not a quick \underline{fix} ' is really important in this regard.

128. The involvement in regional and international developments, specifically the alignment between the nqf and the debates on a regional qualifications framework are critical to the sustainability of both the national and regional processes. All three case studies clearly illustrate this point with South Africa and Mauritius involved in SADC, Senegal in ECOWAS and CAMES, and Mauritius also in the development of a transnational qualifications framework for small States of the Commonwealth.

129. The importance of context and insight into the origins of specific nqfs, more so the official policy decisions to provide criteria of quality (and value) in a societal context on the basis of a social legitimacy for both the world of training and the world of work is evident across the three case studies. The purpose of an nqf is also directly related to the context wherein it is implemented. In South Africa the purpose was transformational, while for both Mauritius and Senegal the purpose is more focused on rationalising the 'jungle of qualifications' and global competitiveness. In this regard it is also important to consider even those approaches that existed prior to colonisation, such as apprenticeships within families that existed in Senegal.

130. Bassey's account (1999) of the nature of the colonial legacies in Africa suggests that the English developed their colonies which were considered as separate and independent entities from England. The curriculum was dominated by missionaries and modelled on a curriculum developed for the poorest segments of European societies. Like the French, the English believed that the quality of education should vary according to the social characteristics of the population and as a result, the purpose of education for Africans was to train them as labourers. Bookish type education was replaced by a strong vocational orientation which would lead to a settled and thriving peasantry.

131. In the case of the French, colonies were rather considered as overseas provinces (*territoires dóutre-mer*) of France. French educators were charged with the responsibility of turning Africans into 'black Frenchman' and as a result, educational programmes for Africans were qualitatively limited and elitist. The French curriculum was designed to educate very few Africans for the very few vacancies that existed at the lower public service cadres and industries.

A large segment of the French population opposed education for Africans because they thought that the purpose of colonialism was to satisfy the need for new markets for French industrial production and to be the source for cheap labour and cheap raw materials (Bassey 1999: 30)

132. Due to the over-emphasis on agriculture the curriculum placed no premium on professions such as engineering, teaching, sales and allied subjects. School enrolments were determined by the pace of economic and social development in the colony and in all cases, this was required to remain less than that of the French metropolitan. This policy resulted in huge student enrolment gaps in French African colonies. Advantages accruing from education were not obvious, and the local populations were not given incentives to participate.

133. It is interesting to note that the developments of nqfs in French speaking African countries have been slower than the English speaking counties. One reason for this difference may be the existence of implicit frameworks based on the French approach, which are particularly suitable for the development of regional qualifications frameworks, rather than nqfs within countries.

134. Both the English and French colonial legacies in Africa point towards a range of misconceptions and limitations, many of which have become entrenched positions over the years. Implementing an nqf in such conditions must be done with the full realisation of this unique context. Of course nqfs are not neutral policy instruments either, and have also been influenced by the countries wherein they originated. This potential double-impact on countries in Africa is discussed further in the next section.

6.3 Considerations for sustainable development in Africa



Figure 2: Approaches for sustainable development of qualifications frameworks in Africa

135. The evidence suggests that in an ideal approach, nqfs may be developed for African countries as specific qualifications systems that reflect indigenous societal values and that are able to facilitate the recognition of learning in education and training systems that have been appropriated to the African context. Of course this is an idealistic model and will require the reorganisation of the entire formal education system in order to reflect the social realities of Africa that is able to present an integrated model that does not require the strong differentiation between school and life as is the dominant condition in the Anglo-Saxon approach. African countries have been impacted upon by many decades of colonial influences, and so even if this radical overhaul would be possible, the problem would arise that African nqfs would not be able to articulate with national and regional qualifications frameworks across the globe, and as a result, will limit the mobility of Africans. Unfortunately this idealistic approach will therefore not contribute to sustainability for some further years. This view is supported by Bassey (1999), who, despite his strong criticism of colonialism in Africa admits that any conditions that restrict education opportunities for Africans should be avoided:

It must be pointed out, though, that any condition that restricts educational opportunity for children of the lower classes cannot but do a great disservice to the entire African continent, for a policy in which the majority of the children are given an education adequate only for agricultural production and urban employment can only heighten political tensions and worsen the unemployment and economic problems except in a situation where there is sufficient foreign capital to utilise the excess manpower – and this is hardly the case in Africa (Bassey 1999: 50).

136. Another approach, which is also the current dominant model, is to introduce nqfs from the Anglo-Saxon and French contexts into African countries where the education systems have been influenced by the colonisation period. The problem with this dependent approach is that the Anglo-Saxon and French approaches to nqfs development are nearly entirely borrowed from more developed countries and soon experience challenges with regard to suitability due to the lack of contextualisation.

While on the surface the approach appears to be successful and cost-effective, difficulties soon arose due to the incompatability with the African context:

[The] blind adherence [in Africa] to the French or British system derives from the nostalgia of having a diploma that is comparable in tone and content to that of France or Britain. What the proponents of this doctrine have failed to understand is that the systems of education in France and Britain were designed for conditions in France and Britain. (Bassey 1999: 42)

To some extent, both South Africa and Mauritius have fallen into this trap, albeit in a limited manner. Also referred to as diffusion, the risk of this approach is even more extreme between African countries that have developed borrowed nqfs and other African countries that are considering nqfs.

137. The third option is a pragmatic approach that recognises the fact that education systems in African countries have been influenced by colonisation and that this is not going to be corrected in the near future. This approach suggests that nqfs developed in African countries are not simply borrowed from elsewhere, but are developed through policy learning processes, and as a result are contextualised to the conditions of the country. This approach has the potential to impact positively on sustainability and does not limit the opportunities of Africans in the global context. Admittedly it is not the ideal situation, but it is the most realistic. In order for nqfs to be developed following the pragmatic approach, policy learning processes need to be put in place.

138. Several criteria to improve sustainability and facilitate policy learning during the development of nqfs have already been identified in this report and are summarised across the three overarching categories of environment, society and economy in the figure below:

Environment	Society	Economy
 colonial legacies have to be transcended nqfs in Africa must be designed for Africa international developmental support, including technical literature, must be embedded in local contexts regional cooperation is essential make explicit engagement for quality assurance mechanisms 	 recognise learning as a shared responsibility advocacy and communication is essential, including clarity of individual achievements qualifications are inherently socially valued ensure both individual and organisational learning promote lifelong learning involve social partners and stakeholders empower marginalized populations and individuals 	 make clear and flexible links to the labour market be circumspect when referencing best practice common terminology may have different meanings there is a need for evidence approaches to governance differ develop alternative pathways fulfilling local needs has international consequences

Figure 3: Criteria to increase the sustainable development of qualifications frameworks in Africa

139. Nqfs developed in the Anglo-Saxon tradition are increasingly being understood as frameworks that facilitate collaboration and coordination overseen by central independent agencies. These nqfs also place strong emphasis on stakeholder involvement and are underpinned by enabling legislation. Nqfs developed using the French approach appear more centralised, State-driven and bureaucratic due to the fact that qualifications is a State responsibility and as a result, is overseen by one or more ministries. In effect many of the more traditional types of governance that existed in African countries through chiefdoms and kingdoms are reinforced by the French approach. The legislative basis is comprehensive and includes also legal instruments to recognise learning outcomes across formal, informal and non-formal settings.

140. Across the Anglo-Saxon and French approaches nqfs are moving towards establishing closer linkages between qualifications and occupational classification systems, including a strong focus on the development of effective information management influencing classification systems. The closer relation to TVET reforms, emphasis on advocacy and communication, and direct involvement in regional qualifications frameworks

141. A useful way of considering the sustainable development of nqfs is by viewing an nqf as an 'ecosystem' containing a complex set of relationships among the resources, contexts and various roleplayers. Everything within this ecosystem is dependent on the other elements in the community, and if one part is weak or dysfunctional, it has an impact on the system as a whole. This conceptualisation of an nqf has many advantages, but needs to be tempered with the realisation that nqfs are also inextricably linked to power struggles. As much as the interrelationships and interdependencies within the nqf 'ecosystem' are important, so too will be the struggles for power and authority within the different parts of the system.

142. The proposed pragmatic approach provides a more useful and sustainable alternative to African countries that are considering nqfs. In this regard it will be important to sensitise international development partners to the advantages and risks of the different approaches, and to encourage policy learning approaches and capacity development towards this end.

6.4 Recommendations to the ADEA Triennale

143. The following recommendations are put forward to the ADEA Triennale in order to promote the sustainable development of qualifications frameworks in Africa countries:

144. A qualifications framework is a reflection of the society and values within a country and remains in permanent evolution. The sustainability of a qualifications framework is based on the coherence of this representation of society, specifically the representation of its qualified citizens.

145. Qualifications framework development is a global phenomenon that is impacting on African countries as the frameworks are used as a highlighting tool to improve the quality of education systems, as a driver to reform educational policies, to enhance accessibility and promote the recognition of qualifications within and beyond the borders of countries. Qualifications frameworks are, however, not uncontested, nor are they neutral policy instruments. Evidence of the impact of qualifications frameworks, as planned by policy makers, remains limited and the expectations associated with implementation are often unrealistic. African countries considering qualifications frameworks should be cautious and pragmatic in their approach.

146. Education systems in Africa have been influenced through extended periods of colonisation and more recently through different foreign approaches. Qualifications frameworks currently being implemented and/or considered in many Africa countries have been influenced by both the Anglo-Saxon and French contexts wherein they originated. The borrowing of these foreign nqf models to be implemented in education systems in Africa already skewed by colonisation and/or other more recent influences should be replaced by an emphasis on learning from the mistakes and successes made in the English and French contexts. The implementation of nqfs based on African values and functions within societies will permit more appropriate learning processes for Africa.

147. A pragmatic and sustainable approach to nqf development in Africa, which also opens education opportunities for Africans in the global context, requires an emphasis on policy learning and a careful consideration of environmental, societal and economic factors. In this regard there is much to learn from nqfs developed in both Anglo-Saxon and French traditions.

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ANNEXURE 1 : COUNTRY REPORT SOUTH AFRICA

Of the total South African population, more than 41% live in rural areas where the levels of poverty and unemployment are high. South Africa is experiencing rapid urbanisation and most major urban areas are surrounded by a periphery of poor residents living in shack settlements with little or no access to basic services. 53.7% of the population are 24 years or younger and within this age group there is a slightly higher percentage of females than males. Approximately 31% of the population is of school-going age. There is a decline in numbers in the 0-4 age group which can be partly explained by falling fertility rates, but may also reflect higher mortality rates amongst young children caused by HIV/AIDS (Statistics South Africa 2002).

The South African education and training system is founded on an Anglo-Saxon model originating from the influential colonial era that existed in South Africa between 1652 and the end of the nineteenth century. The first Western school was opened in the Cape in 1658 to teach the Dutch language. By 1685 schools became segregated based on class and sex, marking the early roots of the race-based segregation followed in later years by the theory of separate development under British rule, notably advocated by Lord Milner the High Commissioner for South Africa between 1897 and 1905. A purposive inferior funding regime for African education followed under the self-governing Union of South Africa in 1910, and complete segregation was enforced under the Christian National Education policy of the Nationalist Government in 1948. From 1953 the State assumed control of the black educational system, formerly in the hands of the missionaries, through its policy on Bantu Education in 1954, and mainly to provide mass African labour with the minimum skills necessary for participation in semi-skilled positions in the forced labour economy. Trade unions attempted to circumvent the State hegemony by establishing their own schools and demanding improved working conditions, while cultural clubs and home education programmes were encouraged by the African National Congress, churches and the Congress of Democrats (Hlatshwayo 2000).

Up to recently, and as late as 1994, the South African education and training system benefited mainly the white population through unequal development of schools and universities reserved for this minority. While significant progress has been made since 1994 to address past imbalances, notably through the development and implementation of the South African National Qualifications Framework (sanqf), much still remains to be done. While the new system has attempted to bring greater parity between different institutional types, it has failed to increase access to post-school education and training (Keevy 2010). With the significant focus on transformation the reliance on artisan-type training which existed before 1994 was gradually eroded to the point that radical intervention is now required to reinforce occupational provisioning in the country. Several initiatives are currently underway to revitalise the sector and develop occupationally directed qualifications with explicit workplace experience components.

Higher education institutions have been modelled after European institutions to meet the needs of Europeans in colonies (Sehoole 2006). Higher education qualifications, particularly from the more established and historically advantaged universities, continue to be regarded as the most important route for school leavers, despite the fact that only the minority gain access. Qualification types include an initial Bachelor's degree, followed by Honours, Master's and Doctoral degrees with some variation in shorter duration postgraduate offerings. Private higher education provisioning has steadily increased and qualifications awarded by these institutions are comparable to those offered by public universities and universities of technology. The number of qualifications that were awarded by South African universities has grown at a steady pace from 1995 to 2004 as illustrated in Figure 2 below.



Figure 1: Qualifications awarded by South African public universities (SAQA 2007)

The growth in the number of qualifications awarded between 1995 to 2004 has been accompanied by a drastic increase in university enrolments, to the extent that the throughput rate at universities has been reported as low as 16%:

Between 2004 and 2007 the overall graduation rate for the public higher education system was around 16%. Out of the three institutional types, comprehensive universities are least successful with graduation rates around 11%. The slight decline in the graduation rate is probably attributable to the rising enrolments in comprehensive institutions over the period. Traditional universities, which are likely to attract the best students, have an average graduation rate of 22% between 2004 and 2007 with the fluctuations reflecting the decline in enrolments until 2006 and the increase in 2007. The graduation rate at universities of technology increased from 16% in 2004 to slightly more than 20% in 2007 (Council on Higher Education 2009: 34).

The vocational sector, comprised of more than fifty Further Education and Training (FET) colleges, has been beset with difficulties despite significant government investment, as FET qualifications are viewed as a second or even third choice option for those with less ability. The schooling system has been negatively influenced by ongoing curriculum changes implemented over the past 15 years impacting negatively on already low literacy and numeracy levels.

The sanqf was formally established in October 1995 through the promulgation of the South African Qualifications Authority (SAQA) Act by the first democratically elected post-apartheid government. The sangf was designed as an integrated system with a strong transformational agenda to encourage lifelong learning (SAQA 2001). Preceding the SAQA Act a broad and extensive consultation process took place that had its roots in the labour movement's desire to recognise the tradable skills of black workers in the bargaining forums for better conditions of service in the late 1980s. Strongly influenced by the effects of increasing globalisation and the assumption that workplaces would be post-Fordist, a series of investigations were initiated under the broader ambit of the incumbent African National Congress's policy development initiatives. As part of the investigations, education and training systems in a number of Commonwealth countries were scrutinised. A common trend towards national standards and flexible pathways was evident at the time. The Australian model, also with strong trade union influences, was particularly attractive to the labour constituency, while the New Zealand model was preferred by organised business. The emerging English model of National Vocational Qualifications was less attractive and perceived as compromised with strong Thatcherite pressures towards privatising education and training provision. The Congress of South African Trade Unions (COSATU) continued to champion the move towards a sangf during the early 1990s and continued to harness support through an inclusive and participatory approach (French 2008).

Reservations from the existing order, notably the predominantly white craft unions, gradually made place for a "blueprint for the sanqf" (French 2008: 33) jointly agreed to by Labour, Business, the State and providers of education and training in 1994. This plan was published by the National Training Board in 1994 (NTB 1994). To date this publication constitutes an important founding document that,

as many have subsequently argued, described the original vision of what the sanqf should have been; a vision that eventually became misconstrued as it was translated into practice (SAQA 2005). Even at this early stage of the sanqf development in South Africa a plethora of critical voices were emerging (Isaacs 2010). Some of the key concerns included the perceived over-ambitious attempt at a "bold, innovative and visionary approach" (Mehl 2004: 15) in a fledgling democracy, when more advanced countries were barely coping, and, as noted by Simon McGrath at the time, the unquestioned acceptance of a weak option when

...progressive forces could think of no coherent and feasible alternative response to the new challenges of power in the era of globalisation and the aftermath of apartheid (1997: 181).

Despite the challenges and mounting criticism, notably a belated response from the higher education sector as the Bill passed through Parliament, the SAQA Act was promulgated in 1995. Two years later, in March 1997, SAQA became operational with a small staff contingent and with a strong reliance on EU and Canadian funding: 80% of SAQA's budget came from donors, 17% from the Department of Education and 3% was self-generated (EU 2002: 42). Many of the contestations which could not be resolved through the earlier National Training Board initiatives (NTB 1994), became more acute at this time, including:

- the particular model of outcomes influenced by concurrent developments in the schooling sector and competency-based debates in South Africa (Parker and Walters 2008 and Moll 2009).
- inclusion of two different types of qualifications: based on unit standards and not based on unit standards (SAQA 2000).
- lack of distinction between 'educational qualifications' and 'training qualifications' exemplified in the notion of an integrated approach to education and training (Blom 2007, Heyns and Needham 2004).
- a distinction between 'qualifications' and 'learning programmes' with the former being registered on the sanqf and the latter the responsibility of individual providers (Keevy 2007).

Despite the challenges at the time, SAQA secured the support of powerful social partners in the Departments of Education and Labour, organised business, and importantly, the ongoing support of organised labour (Cosser 2001) and actively engaged in sanqf development and implementation from the latter half of 1997.

The architecture of the sanqf initially consisted of eight levels (open-ended at both L1 and L8), three bands (General: L1, Further: L2-L4 and Higher: L5-8), and nine qualifications types ranging from National Certificates awarded on any level of the sanqf, to Doctorates and Post-doctorates awarded on Level 8 (SAQA, 2000). Unitised or part-qualifications, called unit standards were also included, with specific rules of combination governing how such part-qualifications could be combined to form qualifications of at least 120 credits. The broad aim of the sanqf was regulatory and transformational to ensure that South Africa had a national system that encouraged lifelong learning, while the specific objectives (SAQA 2000: 5) were to:

- Create an integrated framework for learning achievements.
- Facilitate access to, and mobility and progression within education, training and career paths.
- Enhance the quality of education and training.
- Accelerate the redress of past unfair discrimination in education, training and employment opportunities.
- Contribute to the full personal development of each learner and the social and economic development of the national at large.

The sanqf was designed as credit-based (10 notional hours = 1 credit), but initially not as a credit accumulation and transfer system (see Keevy 2006b). The sanqf system was highly bureaucratised, with SAQA overseeing development and implementation, more than 30 education and training quality assurance bodies (ETQAs), 12 national standards bodies (NSBs) and more than 150 standards generating bodies (SGBs). SAQA also took on the responsibility for the National Learners' Records Database (NLRD) which at present houses more than 8 million learner achievements, 8,000 qualifications, and 9,000 unit standards (SAQA, 2008).

Despite strong initial criticism, the sanqf remained largely intact for the first five years, with the exception of the disbanding of the NSBs which were set up as temporary structures at the outset. In

2001-2002 an official review of the sangf was undertaken and overseen by a Study Team including local and international experts such as Michael Young (England), Ron Tuck (Scotland), Mokobung Nkomo (South Africa) and Ben Parker (South Africa) (Departments of Education and Labour, 2002). Although there was common agreement on many of the recommended changes to the sangf that resulted from the study, the political will to implement the changes did not exist, and for a few more years the sanqf remained in flux. The Study Team Report was followed by a Consultative Document in 2003 (Departments of Education and Labour, 2003) which attempted to take the process forward, but inevitably also became gridlocked in ongoing differences regarding the necessary changes to the sangf between the Departments of Education and Labour. In the meantime, SAQA, with European Union support, initiated a longitudinal comparative study to measure the impact of the sangf on the education and training system in South Africa (Higgs & Keevy 2007). Eventually by 2008 agreement was reached on the changes to the sangf resulting in the promulgation of a new NQF Act at the end of 2008. In 2010 SAQA initiated the third cycle of a longitudinal comparative study that has as its purpose the measuring of the impact of the sangf on the transformation of education and training in South Africa. While the sangf impact study has been noted as the most comprehensive of its kind (Murphy 2006), it has been acknowledged that the methodology has been limited and has to be revised to achieve its purpose (see Higgs and Keevy 2006, Allais et al 2009, Bolton 2010).

One of the main changes to the sanqf was an expansion of the levels from eight to ten. Where the eight-level sanqf required Master's degrees and Doctorates to be grouped together on Level 8, the 10-level sanqf now alleviates this tension. Within the new sanqf landscape, professional bodies (such as the South African Council for Educators, the Health Professions Council of South Africa, and many others) have also been given the opportunity to take on specific responsibilities related to qualifications development and quality assurance. Professional qualifications will also be regulated in a much more coordinated manner. A significant related development within the new sanqf landscape is that professional designations (such as 'chartered accountant', 'engineer', 'doctor' and many others) will be recorded on the sanqf through an agreed process with professional bodies (Keevy 2006).

Another important change that the new NQF Act has introduced is in the roles and responsibilities of national education and training bodies. SAQA retains overall responsibility for sanqf development and implementation, while three sector-specific bodies have taken over the responsibility of quality assurance and standards setting within their respective sectors. The sectoral bodies are referred to as 'quality councils', two of which already existed, while a third was established in 2010. The existing Council on Higher Education, including its permanent committee, the Higher Education Quality Committee, is now the Quality Council for Higher Education. To accommodate the changes the Council on Higher Education will expand its current role that includes amongst other things, institutional audits and programme approval, to include qualifications development on levels 5 to 10 of the sanqf. In the same manner, Umalusi (the current General and Further Education and Training Quality Assurance Council) has become the Quality Council for General and Further Education and Training Strongly on curriculum development and external summative assessments within the formal schooling sector and FET colleges.

The most radical change to the organisational structures that forms part of the new sanqf landscape is the establishment of a new quality council to perform quality assurance and standards setting functions for occupationally-directed training. The Quality Council for Trades and Occupations is now responsible for qualifications on Levels 1-10 of the sanqf that include a structured workplace component, a knowledge and theory component, as well as a practical skills component. Similar to Umalusi, the Quality Council for Trades and Occupations places an emphasis on curriculum development and external assessments. Qualifications which include work-integrated learning, but which fall within the ambit of the Council on Higher Education or Umalusi, are excluded. Qualifications which lead to professional designations and are subject to specific legislation will also be excluded. The Quality Council for Trades and Occupations, again as part of a broader consultation process in the sector, has proposed that two qualifications types are used for occupationally-directed training: National Skills Certificates (minimum 20 credits) and National Occupational Awards

(minimum of 120 credits). Both qualification types are based on a classification of occupations, including trades and professions, developed by the Department of Labour. In particular, it will be possible to register specific National Occupational Awards as trades that will be delivered through apprenticeships. Expert-driven groups of practitioners currently active in the occupations (the term 'communities of expert practice' has been proposed) will be responsible for the development of curriculum and assessment specifications.

Inclusion and advancement of the recognition of non-formal and informal learning, referred to as recognition of prior learning (RPL) in South Africa, has been integral to the sanqf since its inception in 1995. The initial strategy was to, through a broad consultative process, develop policy on RPL (SAQA 2002) and guidelines for the implementation of RPL (SAQA 2003). Through the policy and guidelines, providers were encouraged and guided to offer RPL both for access and for credit. Despite ongoing efforts to support providers, the RPL was offered more successfully in some contexts than others. There are islands of good practice (OECD 2009) but the bridging of these towards a fully-fledged system was restricted on the one level by systemic impediments, and on another level, by concerns and misconceptions that RPL is a quick fix that may contribute to the lowering of standards. As noted in a review of the implementation of the South African NQF:

...of all the expectations placed on the NQF, the aspiration for a system of RPL was perhaps the most significant (DoE & DoL 2002: 86).

Two broad forms of RPL exist in the South African context: the first is *RPL for access*, where individuals are permitted to register for qualifications based on an RPL assessment; in this case the learner receives no formal certification until the qualification is successfully completed. The second form is *RPL for credit*, in this case the individual is awarded credits based on the RPL assessment, even to the point that a complete qualification can be awarded. Each of these types of RPL has a variety of forms, and while both types exist in South Africa, there is a strong bias towards RPL for access. Increasingly it is acknowledged that while State organs, such as SAQA and the Department of Higher Education and Training, have a critical role to play in creating an enabling environment wherein RPL can take place, RPL should be understood as specialised assessment pedagogy located within the domain of provisioning.

Between 2005 and 2007, South Africa participated in an international comparative study on RPL overseen by the OECD (Blom *et al* 2007, Werquin 2010). The OECD study found that South Africa ranks amongst the top five of the fourteen countries studied and demonstrates consistent RPL practices, but more importantly, that South Africa has

...not yet gone beyond the initial stage represented by inspirational promoters of [RPL], even though it has a network of excellent specialists and exhibits scattered signs of very good practice (OECD 2009: 68).

The advancement of RPL in South Africa remains a national imperative and it is acknowledged that a concerted and coordinated effort is required from a broad range of stakeholders to move towards a national RPL system. This point was affirmed at an international conference on RPL held in February 2011 where delegates noted that:

...the time has come to fulfil the promise of RPL through a well-resourced, integrated approach to RPL that links the recognition of current knowledge and skills to the rights to work and learning and that address the needs and priorities of both the unemployed and the employed (SAQA 2011: 1).

South Africa, as a member State of the Southern African Development Community (SADC), has played an active role in the development of a regional qualifications framework for SADC since 2001 (SADC 2005). Progress has, however, been slow and impeded as a result of the lack of trust between member States, mainly as a result of the diversity of the education and training systems and the varying levels of development between countries. The dominance of the Anglophone countries in the region, directly as a result of the fact that the emerging NQF approach originated mainly in the Anglo-Saxon world (UK, Scotland, Australia and New Zealand) were better suited to Anglophone member States, and less so to the Franco- and Lucophone member States (Keevy *et al* 2011). As a result of South Africa's involvement in the region, and also the move towards NQFs in other SADC member

States, concerns have also been raised about the extent to which the sanqf is being exported into SADC and the rest of Africa (Chisholm 2007).

Today it is possible to look back and point to areas that have been fine-tuned during sanqf development in South Africa over the last 15 years. The obvious mistakes, such as overprescriptiveness, a one-size-fits-all approach, over-specification, too segmented unitisation and heavy bureaucratisation come to mind. Idealistic and high-expectation context that existed as apartheid came to an end in the early 1990s, demanded a radical intervention that had to achieve much in a short time (Keevy 2009). It is not certain that a different sanqf, even the sanqf now being proposed, would have achieved this. Today the original objectives of the sanqf remain in place, while the architecture has evolved into what many now call a 'third generation qualifications framework'. While the effects of globalisation remain, many of the original expectations, notably the blurring between the vocational and academic boundaries, have not fully materialised, and there is no doubt that the sanqf, as is the case for other qualifications frameworks now emerging across the world, will have to continue to evolve as the context wherein it is implemented continues to change.

As one of the pioneering nqf countries, South Africa has learnt much in the period between the initial promulgation of the SAQA Act in 1995, and the new sanqf Act that was promulgated in late 2008. As the understanding of the sanqf has changed, the framework itself has also evolved, and it is now possible to recognise that the post-apartheid euphoria that existed in the mid-1990s placed far-reaching expectations on the sanqf, some of which remain unattainable and misplaced. Yet, it is also recognised that despite the prolonged review of the sanqf in South Africa between 1999 and 2007, significant progress has also been made as South Africa is increasingly used as an example of best practice internationally, despite having been subject to intense criticism in the domestic context. The South African sanqf is now understood as a system of coordination, collaboration and communication across education, training, development and work (Parker and Walters 2008). It is a system wherein different sectors are able to follow sector-specific approaches but continue to be guided within a nationally coherent framework.

With regard to sustainability of the sangf it is useful to note some key lessons from the development and implementation of the sangf since 1995, as identified by Isaacs (2010). This includes understanding the limitations of nqfs and taking intellectual scrutiny seriously because the credibility and effectiveness of an nqf depends on it. According to Isaacs nqfs should not be seen as purely technical instruments to be implemented in overly bureaucratic and technicist manners. Active stakeholder and role-player participation is essential for building the relationships that facilitate collaborative networks that make shared understandings, shared meanings and shared strategies possible. Communication and advocacy are essential for informing the public of the value-add that the sangf offers them. This function requires significant resourcing which is often overlooked in favour of the more visible operational activities required. It is also important to recognise the power shifts and contestations. Finding viable and reasonable resolutions to power struggles can go a long way to advancing an environment that supports lifelong learning and is conducive to quality learning and credible qualifications. The direct involvement of professional bodies is a vital component of the sangf. New understandings of professional designations, and the entrance of professional bodies in a previously excluded sector, have been of great benefit to the system as a whole. The inclusion of nonformal and informal learning in an ngf is always going to be a challenge, but cannot be ignored. Ngfs are about systems change and change is not easy in most circumstances. When we come to education and training systems change, we have huge inertia to overcome in order to effect change. A particular thorny issue is curriculum development and change. This is extremely contested terrain. The sanqf, because it respected the academic freedom and autonomy of institutions, did not seek to involve itself in curriculum development as a whole but restricted itself in standards setting to the exit level outcomes and assessment criteria for qualifications (unquestionably a part of curriculum development). Within the new environment, sector-specific approaches are now being accommodated in the sangf, including the preference for a curriculum-based approach preferred in the schooling and higher education sectors. This accommodation has diffused the contestations around using learning outcomes within South Africa. International networks and relationships are most helpful in enabling the country to reflect deeply on its nqf policy and practice. Participating in international research initiatives on nqfs has also been a mutual enrichment of both the sanqf and the international nqf discourse.

It is apparent that the South African education and training system has been impacted upon by external influences over the last 350 years. Ranging from the early colonial attempts to 'educate' the native population to the ever-deepening segregation that became increasingly embedded within the system; the need for mass manual labour, and eventually to the emancipation of the disadvantaged with the end of apartheid in 1994; and the subsequent introduction of the sanqf in the aftermath of apartheid, the end-result is a system under duress. As noted by Malherbe more than 80 years ago:

There is perhaps no country in the world where the educational system has had so many buffetings and tampering from without as the education system of South Africa. At no period was education to any extent the spontaneous expression of the ethos, or genius of the people. To a very large extent...[South Africa's] educational system has been the result of successive superimpositions of systems or bits of systems from without (Malherbe 1925 in Hlatswayo 2000: 47).

There is no doubt that there is much to be done to improve the South African education and training system at present. South Africa will have to carry the legacy of many centuries of external influences, most notably with regard to entrenched segregation. The challenge now is to make sure that the sanqf does not become yet another superimposition from without, but rather provides the avenue through which to accelerate the transition to an equitable and fair system that is able to express the genius of all its citizens, possibly for the first time in its contested history.

ANNEXURE 2 : COUNTRY REPORT MAURITIUS

Being a colonised island, the education system of Mauritius has been shaped and influenced by various regimes which occupied the island until its independence in 1968. Thus, despite being heavily anchored in the British system, the French as well as the Indians have also deeply marked Mauritian education. The history of Mauritian education finds its roots in 1770s under the administration of the French East India Company and the Company to the Crown. With the advent of the French Revolution in 1789 the first real development was to take place within the Mauritian education with the idea of active State participation in education (Ramdoyal 1977). In 1790, the Colonial Assembly proclaimed that the State had to provide moral and political education to its citizens and with this, the implication that there would be a uniform type of education that would be made equally available to all citizens, no matter what class or socio-economic group they came from (*Ibid.*). This was a key moment in the history of Mauritian education and it pre-empted the long and challenging process in the years that followed.

In 1800, a fully endowed national institution in the form of the *Ecole Centrale* was established, which would in time become the present day Royal College. This was an adapted version of the *Plan LaKanal* which recommended the creation of *Ecole Centrales* to provide secondary education with an academic base for scholars who aspired to university education and professional training (Ramdoyal 1977). In contrast, for the masses, primary education was advised and as such provision was made for separate private schools. The French system was quickly inculcated and assimilated within the Mauritian education system. The curriculum, influenced by prevalent demands focused on reading, writing, French grammar and language, was conducted in French. *Ecole Centrale* was run like a French *Lycée* including the administration of the establishment with a French *proviseur* at its head. In fact, even today, French plays an important role, second only to the omnipresent French-based Creole within the education system.

When the British took possession of the island, following the Battle of Grand Port, other changes soon ensued. Although the residents of the colony were allowed to maintain their way of living under the influence of French culture and language, it was under the British rule that some of major development were to take place, that is, the setting up of free primary schools to instruct the destitute and the coloured children and the Royal College's gain in status which eventually strengthened the prominence of British influence on Mauritian education. Under the governance of Sir Robert Farquhar, the college was made bilingual and bicultural, and subjects such as Agriculture and sciences were introduced. One aspect which still prevails in the current system is the dominance of English Language at School Certificate and Higher School Certificate level. In addition, Jean Lebrun having introduced the First Form of English Primary School Education, undeniably opened up the schooling to the masses which in turn meant access to non-manual and non-agricultural types of employment.

Though paved with hardship, Mauritian education underwent constant changes. The education system reflected the resonance of both French and British colonialism within its curriculum and the mode of delivery. Furthermore the intermarriage between the French and the British also resulted in the award of scholarships which were to be the foundation of the current scheme of scholarships in Mauritius. The next wave of change came with the abolition of the colour bar in 1832 and the surge of Indian immigrants in Mauritius (Prithipaul 1976). In addition to the socio-economic turmoil in the country, the barriers of language and the procurement of teachers were also areas of concern. Consequently, the education of Indian immigrants was largely left to English missionaries and teachers brought from India. A long but successful battle was to ensue which would secure recognition of Oriental languages and culture within the formal school curriculum. Today, Oriental languages are part of both Primary and Secondary education. In fact through the India General Cultural Scholarship Scheme and Scholarship Scheme for Mauritian Nationals many Mauritians students have the opportunity to continue their studies in India.

Ward's Report, the 1941 Education Act, and the introduction of the Education Ordinance of 1944 allowed many reforms to be finally materialised (Ramdoyal 1977). The Ordinance created a system of 'dual control' over the State-aided schools and the pattern of education of a three-fold nature comprising the parts played by Government, by the education authorities and by private enterprise, whilst the Ward's Report enabled unified Standard VI examinations to take place. Once the ministerial system was introduced in July 1957 in Mauritius, a Minister of Education was appointed and thereafter it was to be the role of the Ministry to foresee and organise the development of education in Mauritius. The amendments of Education Regulations of 1957 and the Education Act of 1982 further grounded and formalised the Mauritian Education. Mauritius now has a 6-5-2 educational structure where Primary and Secondary education is free and available to learners of both genders in government schools followed by five years of secondary education leading to the Cambridge School Certificate and a further two years leading to the Cambridge Higher School Certificate. In an endeavour to meet the targets of Education for All, the Government of Mauritius has even granted free transport to all full-time students.

The 20th century has brought along many radical changes to the education system in Mauritius. Yet, in many ways Mauritius is still anchored in its colonial traditions. Today, even though Mauritius has become an independent State, the influences of both the French and British are still very much present in the education system. Mauritian education it seems is undoubtedly saddled by a system of dual control (Ramdoyal 1977). In fact, until today although the medium of instruction is English, in practise it is the French and Creole language that have taken over. On the other hand, the Code Napoleon forms an important part of the legal system but with strong overlap of English Law modified by local enactments. The LLB curriculum at the University of Mauritius clearly exemplifies the above. Besides, despite having evolved within an Anglican system, it still privileges its French heritage through the delivery and recognition of courses such as *Certificate d'Aptitude Professionelle*, *Baccalauréat*, *Diplôme Universitaire de Technologie* and *Diplôme d'Etudes Universitaires de Sciences et Techniques*. The dualism which pervades the Mauritian system can be traced back to the Capitulation Treaty of 1810 when the British took over the island from the French. In the Act of Capitulation, the British guaranteed that they would respect the language, the customs, the laws and

the traditions of the French settlers. Over the years Mauritius has developed a hybrid education system. In fact, with the advent of the Mauritian National Qualifications Framework (mnqf) these diverse French and English qualifications have been pitched on the framework and have subsequently gained national recognition. To this end, the Government of the French Republic and the Government of Mauritius have also signed a Memorandum of Understanding and generated a protocol to enable mutual recognition of qualifications. And although English is the official language, French has maintained its position within the Mauritian society, albeit that the French institutions are mainly private and fee-paying.

The 20th century also saw a rapid influx in British qualifications within the Mauritian education system. In fact they gradually gained an edge over the French system and soon there were diverse courses being delivered to the Mauritians emanating from British institutions. This led to gradual disarray pertaining to certificate and diplomas within the Mauritian education system. In fact Mauritius was soon invaded by a 'jungle of qualifications'. It was with the aim to rationalise the qualification system that the Government decided to implement a mnqf. The mnqf has consolidated the merger between Mauritian, French and British qualifications.

The Mauritian economy, like other small island economies, is a vulnerable one within the context of globalisation. In spite of its recent economic success, Mauritius has to overcome a number of challenges ahead, with a 3.6 % growth in GDP in 2010, in order to maintain sustainable development if it wants to enable its people to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. Political, economic, technological or social changes systematically put pressure on our economy, and the Mauritian education and training system, as one of the main social actors, has to adapt to these stresses and strains to continue to meet the expectations and requirements of the society. The training system has therefore to re-orient its agenda for action so as to continually provide scientific and technical skills in relevant and responsive programmes, and consequentially develop a new generation of human resources which are more enterprising & innovative, flexible and multi-skilled.

In this endeavour, all efforts have been made to prevent loss of human capital, thus calling for proper management of our human resources, achieved mainly through the establishment of a certification system allowing for the integration of academic and vocational awards, and including all stages of education and training from pre-primary to tertiary education and technical and vocational education and training (TVET). The development of the mnqf represents one of the main initiatives in addressing the challenges of qualification reforms and skills recognition. An improved skills development and recognition system is crucial as a means to facilitate lifelong learning and help individuals maintain their ability to compete in the labour market. The conclusions of the *General Discussion on Human Resources Training and Development* at the International Labour Conference in 2000, reaffirmed that the development of nqfs is important for both enterprises and workers as it facilitates lifelong learning; helps enterprises match skills demand with supply; and guides individuals in their choice of training and careers.

In 1998, the certification system in Mauritius had been identified by Government as a hindrance to the effective realisation of national goals in the field of human resource development. There were a large number of providers of education and training, offering courses in varied fields and at different levels, of varying duration and quality. Many certificates offered by these providers recognised attendance only, with little or no information about the outcomes of learning achieved as a result of such attendance. There were limited qualification and career pathways available to qualification holders, with many of the pathways constrained by historic patterns and regulations. The system was seen by many as being elitist, and advantaging the few fortunate enough to gain entry into reputable institutions. In addition, the certification system did not recognise prior learning, that is, skills and knowledge acquired as a result of informal training, life and work experience.

Following a study conducted by the Scottish Qualifications Authority in 1998, the Government of Mauritius was advised to set up an nqf in order to put order to the existing 'jungle of qualifications'.

Debates around the nqf were then initiated at national level, and views of the industry together with other critical stakeholders were sought. The mnqf was eventually developed with the setting up of the Mauritius Qualifications Authority (MQA) in 2002 with the MQA Act 2001 to develop, implement and maintain the mnqf, ensure compliance with provisions for registration and accreditation, and ensure that standards and registered qualifications are internationally comparable. The rationale behind the mnqf can be summarised through the following objectives:

- harmonise the education and training system operative in Mauritius and to subsequently meet the demands of economic changes.
- meet the needs of government to make education and training more accountable by bringing all of the systems in line with national policy.
- provide for comparability across borders by ensuring that Mauritian qualifications conform to international standards and thereby gain global recognition.

However, there are a few countries which pioneered the way forward for qualification frameworks. Amongst these countries there are England, Scotland, New Zealand, Australia, South Africa and Ireland. Being the first generation of nqfs, these countries have guided many others in the development of their own frameworks. The mnqf emanates from the second generation of qualifications frameworks together with countries such as Singapore, Mexico, Namibia and Malaysia. Though it was borne within the Mauritian context, the mnqf was also significantly influenced by the Scottish Credit and Qualifications Framework, the New Zealand National Qualifications Framework and the South African National Qualifications Framework.

The mnqf is made of ten levels ranging from the Certificate of Primary Education at Level 1 to a Doctorate at Level ten. Each level is defined by level descriptors which describe the expected outcomes and learning demands with the aim to enable learners to carry out processes. In addition the mnqf comprises three strands, namely primary/secondary, Technical Vocational Education and Training (TVET) and tertiary, which clearly define progression routes and pathways from one level to the next.

The qualifications registered on the mnqf are based on unit standards which means that the learning outcomes assumed to be necessary for a particular qualification are divided up into their basic elements and units, that is, they are defined in terms of knowledge, skills and competences. Subsequently each unit is assigned to a level and given a credit rating in terms of the notional hours needed to acquire the necessary skills and knowledge. Non-formal or informal learning is relevant to the competency outcomes of unit standards as developed by the MQA and can subsequently be pitched on the mnqf given that awarding bodies use the unit standards to develop evaluation grids which are needed in building the portfolio and assessment for RPL. The main focus of RPL is therefore the learning outcomes, in the form of skills and knowledge of experiences, and not how, when and where the learning occurred.

In 2005, the MQA Act of 2001 was amended and one of its functions is now to recognise and evaluate qualifications, other than those obtained in the primary, secondary and post-secondary sectors, for the purpose of establishing their equivalence. Given that qualifications on the mnqf are nationally recognised, it acts as a translation instrument which provides a means by which different qualifications can be compared and related to. Using the level descriptors of the mnqf, the MQA establishes the recognition of foreign qualifications and equivalence between foreign qualifications against local ones. That is, the qualifications under study are assessed and pitched at the appropriate level on the mnqf, thereby giving an indication to the applicant of the level of their learning, and also of the educational path route for further progression, in so doing promoting the concept of lifelong learning.

Although the purpose and the architecture of qualifications frameworks differ around the globe they have certain common elements which are of utmost importance in the maintenance of the framework, that is, quality, norms and comparability. In order to ensure that quality standards are met, the MQA has put in place various mechanisms to ensure the promotion of quality and comparability of

qualifications included onto the framework. These criterions are essential in the sense that they offer consistency and bring transparency to the whole process. The principles and procedures are as follows:

- involvement of experts and stakeholders in qualification generation through Industrial Training Advisory Committee (ITAC);
- fit-for-purpose qualifications;
- identification and registration of relevant qualifications and unit standards for education and training;
- international comparability of qualifications and unit standards.

The MQA has set up 19 ITACs⁹ with a view to generate unit standards and qualifications in all sectors of the Mauritian economy. This has solicited the collaboration of various governmental, public and private bodies. For example the MQA has worked with the Mauritius Institute of Health to develop qualifications in the Health and Social Care Sector. Such collaborations have been consolidated over the years and a sustainable relationship has been built with the stakeholders involved. The role of the ITAC is a complex one given that they have to ensure that the qualifications being generated are of high-quality, nationally relevant and internationally comparable. In short they have to make sure that the qualifications are 'fit for purpose' and compliant to the expectations of the industry. In addition, MQA has also set up two committees to generate unit standards and qualifications in the fields of Adult Literacy and Early Childhood Education and Care. So far, 3528 unit standards and 130 qualifications have been generated in various sectors of the Mauritian economy.

More explicitly, the unit standards are statements of learning outcomes which define what a learner must know, understand and should be able to demonstrate, after the completion of a process of learning at a particular level. As such outcomes are also about attitudes. The generation of the learning outcomes has required careful thought. Not only can the amount of detail in a learning outcome vary across qualification and levels, but learning outcomes can also be further divided into different categories of outcomes which reflect different fields and subfields of economy. The process of designing qualifications for the mnqf has subsequently led to the development of an enhanced synergy between academics, the TVET sector, as well as the economic sectors.

Another element common within the frameworks are level descriptors designed with the aim to maintain coherence across the development of qualifications by ensuring a shared understanding of learning and competence be achieved at each level. As such, they provide a guideline against which the unit and its proposed learning outcomes can be compared in order to ensure that it meets the requirements of the intended level. Thus, in addition to their expertise and know-how, ITAC members use level descriptors to assign the appropriate level to units and qualifications alike.

Recognition of qualifications is also a key component in the registration of qualifications onto the mnqf. Only nationally recognised qualifications by duly accredited awarding bodies are included on the framework. In order to maintain standards, non-award courses are not registered on the framework. Currently there are four major national institutions which have been identified as recognised awarding bodies, they are: Mauritius Institute of Training and Development, Mauritius Institute of Health, University of Mauritius and University of Technology Mauritius. In relation to international awarding bodies, such as City and Guilds or Edexcel, the same principle is applied. That is, if the qualification is not recognised in the country of origin it automatically becomes ineligible for inclusion on the mnqf.

One of the functions of the MQA is to register and accredit training institutions in Mauritius. Currently 567 such training institutions are registered with the MQA. Training institutions have to meet strict requirements of safety, security, financial standing, and availability of equipment, resources and infrastructure, amongst others, prior to consideration being given to their application. MQA has formulated a set of quality assurance standards which unfolds in three stages starting with the registration of training institutions, the staff involved and the accreditation of programmes. These

⁹ Agro Industry, Automotive, Beauty Care and Hairdressing, Building Construction and Civil Engineering, Electrical and Electronics Engineering, Health and Social Care, Information & Communication Technology, Jewellery, Management, Mechanical Engineering, Printing, Seafood & Marine Industry, Textile and Apparel, Tourism and Hospitality Management, Automation and Robotics, Furniture Making, Handicraft, Language Training, Transport and Logistics

guidelines ensure that all requirements are fulfilled in accordance to the MQA Act 2001. It is also to be noted that registration of training institutions are granted for a period valid up to three years subject to continued compliance with conditions and regulations. In addition to the above, training institutions are also required to have their managers, programme officers and trainers duly registered by the MQA. Such measures ensure that the quality of education and training being delivered by the training institutions are continuously being monitored and are consistent with nationally set standards. On the other hand these mechanisms ensure that Training Institutions do improve their methods to provide high quality training by offering more accountability at all levels of training and of the processes and people involved. One of the tools adopted by the MQA to uphold control over the whole process is that of surprise visits. These visits are conducted by MQA officers with the aim to stimulate improvement and ensure that standards are being maintained by training institutions. More importantly, by doing so the MQA ensures that the interests of learners are safe-guarded and that they are provided with the right infrastructures and learning materials needed to assist their education and training. It is to be noted that those who fail to abide by the law are liable for fines and even imprisonment.

Under the MQA Act 2001, training providers have to seek accreditation for their programmes prior to delivery. Accreditation of programmes enables the MQA to set benchmarks for quality management arrangements in education and training for the TVET sector. The outcome of the programme is the award of a certificate, which is approved and recognised as formal learning, to successful candidates after a formal assessment exercise. Hence, only qualifications awarded by recognised awarding bodies are considered for inclusion in the framework. Once these are validated they are subsequently pitched on the appropriate mnqf level, which allows students to know their learning pathway, should they want to study further. A number of considerations arise with respect to the inclusion of qualifications on the mnqf. However, the key objective remains the promotion and maintenance of education and training standards with the aim to prepare learners with the right skills and competences to meet the demands of the economic sectors. This is a core dimension of the mnqf, that is, to encourage learners to participate in lifelong learning and to enable them to maximise on their abilities.

MQA will set up a Learners' Account, also known as the National Qualifications Framework Information System. The Learner's Account is a database comprising record of achievement for each Mauritian learner from the primary to tertiary level, as well as the technical and vocational sector, while also providing useful and relevant information on the labour force. As such, this information system will provide employers with notions about the quality and quantity of the skills of the workers once they have been pitched on the mnqf. The mnqf will also act as a reference for the individual once his/her achieved learning has been recorded in the learners database, s/he may opt for career change and/or future lifelong learning possibilities. In addition, the system will provide useful information while attracting investors in the country.

Mauritius is facing major challenges within its economy at the local and international level. Not being blessed with natural resources, the only resource that it can rely upon is its human capital. However, with the rapid influx of knowledge, society continuously makes demand for new competences. Therefore it has never been as important as it is now that individuals keep acquiring new skills throughout their lives. In such a context, the MQA acknowledges the need for more people to stay in education and training longer, but the gap is widening between those who are sufficiently qualified to keep afloat in the labour market and those who are falling irrevocably by the wayside. In the next phase towards the consolidation of the mnqf, the MQA is envisaging intensifying its efforts in creating increased public awareness of the mnqf and its benefits. This will entail continuous organisation of seminars as well as conferences across Mauritius and Rodrigues and the publication of press adverts, pamphlets and brochures.

The harmonisation of qualification frameworks is becoming very crucial around the globe. In this context, mutual recognition of qualifications is rapidly becoming a necessity. Therefore, with a view to promote recognition of Mauritian qualifications the MQA has signed a memorandum of technical cooperation with a number of countries, namely Botswana, Zambia, Namibia, Seychelles and Ghana.

In order to consolidate mutual recognition between countries, MQA is also working in close collaboration notably in the African region and for the Virtual University for Small States of the Commonwealth (VUSSC). To this end, a Transnational Qualifications Framework has been established and a Management Committee chaired by the Director of MQA is leading its implementation. The TQF will serve as a translation tool between different nqfs and also regional qualifications frameworks, while providing momentum to the transfer of courses, qualifications and learners between countries. It is to be noted that the TQF was launched in Namibia in May 2010 and courses will shortly be registered on the TQF.

The Southern African Development Community RQF (SADC RQF) is seen as a means for simplifying, structuring, classifying and valuing the many existing qualifications and awards from all areas of education and training within Member State and across the sub-region. With a view to achieve same, a Technical Committee was set up to look into the RQF and MQA was a member of that Committee. In addition, the expertise of MQA was also sought in a sub-committee with regard to a survey conducted on quality assurance. It is believed that the SADC RQF will also be useful in facilitating the mobility of learners and skilled workers in the region. However, much has to be done to have the RQF operational.

Questions are often raised on the one hand about the ways in which education can become more relevant to the world of work and, on the other hand how vocationally oriented training could become more valued. The mnqf promotes the integration of both education and training. If the skills crisis of the country, including unemployment and lack of progression, is to be solved vocational and occupationally-based qualifications cannot be considered for those people of 'lesser intelligence'. There is a need to find ways of raising the 'positional good' of the mnqf qualifications. It is time to identify and overcome the barriers to progress, to plan the evolution of the mnqf and of the wider education and training system. This will not be possible without deliberate, sustained effort from all involved and will have to take place at all levels of education and training.

ANNEXURE 3 : COUNTRY REPORT SENEGAL

The French commercial and military occupation) was effective in 1659 in Senegal, but the French empowerment was really settled in the year 1677 with the Gorée capture. After a long period of riots with the different chiefs of the black kingdoms supported by Islamic invaders, all kingdoms came under the power of France in 1900 except Casamance which was annexed in 1916. At this time an important programme began to evangelise Senegalese people by missionaries. After the Second World War, the French colonial empire moved towards autonomy for its colonies through first the French Union in 1946 which gave Senegal a new status as an Ultra-marine Territory. A national vote in 1958 furthered the movement towards independence, which was pronounced on the 2nd of August 1960. Senegal subsequently developed its own constitution which remains very similar to the French model. During the pre-colonial period, the education system was based on a caste approach allowing an individual transmission of the social and vocational knowledge, skills and capacities by families. At the same time there existed a collective system based on initiations for social and cultural transmission. The introduction of the Muslim religion permitted the development of Koranic schools which later co-existed with Christian schools developed by missionaries. But in the year 1920 the French colonisation imposed the Laic model based on the French pattern as the dominant model which remains in existence to the present day.

In 1968, the education system was the first goal of an important social crisis which stopped in 1981 with the implementation of a General Council for Education and Training which designed a new approach for Senegal, taking account of the social and cultural diversity. But the national budget could not permit this implementation because it was focused on the resolution of the economic crisis during

the 1980s and it was necessary to wait until 1998/1999 to get a specific programme for education and training for the next decade. An Action Plan for Education for the whole society was set up in April 2001. Such a programme was defined after two meetings in Kolda in 1993 and in St. Louis in 1995. It designed a new policy based on the principles of cooperation with civil society. It proposed a new way to manage schools sharing the investment between the State and different regional and local stakeholders. The beginning of this policy was not very successful, and a new programme was set up in order to develop the quality of training and non-formal education and literacy. A ministry in charge of basic education and national languages was created in 1995 covering two sectors: one related to formal education (including general primary and secondary (or middle) education, TVET and higher education) and non-formal education related to some initiatives developed since 1970 and maintained due to the high level of illiteracy. Financial assistance was provided from the State, the World Bank, and the German Cooperation within the Action Plan from 1993 to 2002.

The first idea of an nqf in Senegal can be identified in the year 2008. At this point the Senegalese education and training system was reformed in depth according to a Ten Year Education and Training Programme for the decade 1998 to 2008 (*Programme décennal de l'éducation et la formation*, PDEF). All the education sectors were concerned for an effective achievement of the following strategies: battle against illiteracy; effective management of student flows to secondary and higher education; restructuring of technical and vocational training; bridging of the gaps on the educational map; provision of higher quality teaching and training; improving the management of preschool education; improving access to secondary education; adaptation of higher education to market needs; and extended use of information and communication technologies. A political letter in November 2004 signed by the Minister of Education and the Minister of Economy and Finances confirmed the orientation of the programme and added financial support in order to stimulate the actions announced in the PDEF. In this regard, the State has also implemented a programme for the building of school infrastructures, and has devoted 35% of its budget to education.

The year 2008 also sounded the end of an important step strengthening the education and training structure in Senegal supported by the French Association for Development (AFD) through a specific committee (*Unité de suivi et de coordination de projet*, USCD) placed under the responsibility of the new Ministry of Technical and Vocational Education (*Ministère de l'enseignement technique et professionnelle*). In September 2008 a seminar was arranged focusing on the implementation of a proposal by the Homologation Committee (*Commission Nationale d'Homologation des Titres et Diplômes*) to rationalise the qualifications existing in Senegal. The structural reform permitted a better supervision of TVET under the control of the State as for a long time education and especially TVET was developed by many different stakeholders without national rules or guarantee of value.

Senegal's education policy is based on Law 91-22, enacted 16 February 2001, following the principles mentioned in articles 21, 22 and 23 of the Constitution adopted in January 2001. Cooperation agreements with France have made it possible to have equivalent diplomas. Many common principles with the French exist, including equal access to education and training as a State mission and a right, which must be ensured throughout the nation, especially in the rural areas Education and training can be developed by any kind of institutions: public, religious and private in the literacy field in the different national languages existing in Senegal. As with the French educational system, the system in Senegal is highly centralised and organised through regional and local administrations. Private schools can be established and deliver national curriculum under the authority and the control of the State. Education is compulsory and free up to the age of 16.

Before the reform, TVET was under the responsibility of the Ministry of Education but its offer is unable to cope with the number of children that must enrol each year. As a result, many school-age children seek education and training through more informal means. Though apprenticeship was implemented with around 100,000 apprentices identified it appears that a large number of them receive no wages and finally were not trained. In response, the TVET sector opted to set up an accreditation committee in charge of the control of quality insurance related to the qualifications delivered by those stakeholders.

The seminar launched in September 2008 focused on the recognition of learning outcomes evaluated after all kinds of learning, formal and informal, dealing with qualifications delivered by all types of authority (public, private, trade branches, religious, NGO, etc.) in charge of education and training. A first mapping of the offer existing in this field concluded the need for regulation and rationalisation. Different recommendations were proposed, including:

- provision of a legal framework for qualifications in order to harmonise the different existing systems.
- design quality principles and rules for trade sectoral qualifications.
- linkages between the Homologation Committee and the existing direction in charge of examinations related to qualifications under the responsibility of the national public institutions.
- capacity building for the staff in charge of qualifications and the potential implementation of a new committee through missions in other countries (such as Burkina Faso) which have already developed new kinds of qualifications.

This seminar could be considered as a first step towards an nqf for Senegal, although at present such an initiative seems far-reaching. Nevertheless, consideration was given to separation of the training and assessment process as well as the currency of the qualification. Another point emerged at the same time dealing with the awareness of a great number of stakeholders involved in the process and the need to give credibility to their actions. Such report could be considered here as a first step towards a future Senegalese nqf (snqf).

The concept of a snqf appears for the first time in a letter from the Minister of Education (October 2008) giving his agreement to involve Senegal in the implementation of a regional qualification framework in West Africa. The task entrusted to the Director of Planning and Reform set up according to the PDEF who provided a technical note about this initiative on the 25 November 2009 launching and introducing the implementation of the snqf. The project for development of a regional framework for ECOWAS imagined by UNESCO-BREDA failed and effort was focused on national initiatives. This decision was taken after interviews made in July 2009 by representatives of UNESCO-BREDA and a consultant for the different education and training sectors (primary, secondary, higher education levels, TVET, human resources). Finally, a workshop was set up with all stakeholders and representatives from non-formal education, other ministries involved in the design of qualifications, as well as social partners. This workshop took place in January 2010 and was the responsibility of the Director of Planning and Reform with the support of UNESCO-BREDA. The objectives were twofold:

- have common capacity building for staff comprised of representatives of the different sectors in charge of education and training.
- provide a first draft of a snqf.

This workshop was finalised with a public conference involving stakeholders from the labour market and education and financial stakeholders in order to reflect on the outcomes and results. The leader of the working group resigned a few months after the workshops and although a new person was appointed to lead the initiative, the nqf implementation stopped here. Even if UNESCO-BREDA maintained its methodological support, it may also be necessary to foresee concrete support also from the Senegalese side. The project is on standby waiting for support to recommence and the working group involved in January 2010 is always ready to continue its task.

On the other hand, UNESCO-BREDA is supporting nqf approaches in the Sub-Saharan region. A seminar was held in Zanzibar (Tanzania) at the beginning of September 2010 for the UNESCO teams of ECOWAS countries where representatives of other African regions were also invited. The subject of nqf and RQF was one of the themes discussed, concluding in the need for capacity building of technicians involved in the development of nqf. Following the ECOWAS demand, a first methodological document was provided in January 2011.

The Senegalese model related to the formal qualifications is directly inspired by the French model. Except for General Higher Education, formal qualifications are designed at a national level and assessment is organised at a national level under the Division of the Examinations and Concourses (DEXCO) which is the responsibility of the Ministry of Education together with the Ministry of Technical and Vocational Education and Training for vocational qualifications. For Higher Education each university is accredited to develop its own qualification system.

Informal and non-formal programmes are delivered by different types of stakeholders. These include professional bodies, Chambers of Commerce, handicraft organisations, NGOs, religious schools, et cetera. In Senegal different religious NGOs are present including Christian and Muslims (called also Koranic schools or Daaras). Before the French colonisation, education traditionally took place through apprenticeship within the family and in Islamic schools. Such education systems disappeared but they were kept in mind. That is the case in some institutions as Daaras may provide an opportunity to reach some groups of children or adults. Agriculture centres, foreign initiatives (Germany, Luxembourg, European Commission et cetera and even some ministries (such as industry or tourism) developing specific actions towards specific groups. The list is not exhaustive as the information related to those actions are not centralised or even known except by the partners involved.

These activities involved only aspects of literacy and skills training. But sometimes there exists an evaluation at the end of the training process and a demand for recognition from the applicants in the formal context. As in the French approach, for formal qualifications, assessment is available whatever the learning process, formal, non-formal or informal. The organisation of the assessment process allows any learner to sit for the examinations. Systems need to be put in place in order to ensure that not too many people write the exams without any chance of passing. For this reason, the recognition of informal qualifications by the formal system could be of value. Non-formal qualifications for specific learning outcomes could be developed by professional bodies called *titres de branches* and could be also called Vocational Qualification Certificat (*Certificat de qualification professionnelle*). In the same way non-formal education could aim towards formal qualifications. That is the case for example with basic community schools which are attended by children aged between 9 and 14 years old, who have not yet been to school or who have dropped out of school at an early stage. They receive basic practical and pre-professional education in national languages and French. The education cycle in those schools is four years. It is also the case with for example street schools, managed by non-formal and non-standardised organisations, which are monitored by the education system.

According to what was explained before, it can be said that an nqf exists in Senegal directly issued and applied from the French nqf for formal qualifications. Definition and criteria used in order to give such a conclusion are related to the fact that such formal qualifications are designed under the responsibility of the State. Each type of qualification is defined through decrees describing the aim and the content of those qualifications as well as methodology and process of designing. It defines also the main objectives of the training process and gives instructions about the assessment procedure and jury. Each specialty of a qualification is also defined by another legal text or *arrête*. In the Senegalese system, as in the French one, the value of a qualification can only be defined by the highest level of the State in charge of education. The problem and the challenge in the development of an nqf in such a context is to introduce non-formal qualifications as a part or a complete process of recognition of their values, towards a formal recognition by the State.

In this context, qualification frameworks existed before the design of the national qualifications. The process of the qualification in Senegal is an adaptation of the existing French educational model which is designed in line with theold French context. The French pattern developed for qualifications was adapted to relate to levels of employment. General qualifications created the opportunity to enter into a civil servant job and TVET qualifications are made to be convenient to the French labour market. The reforms resulting from the PDEF keep the original framework but drive qualifications mechanisms towards an adaptation to the national context.

As for criteria, quality principles are based on implicit support which is necessary to make explicit by other descriptors such as duration of training and training programmes. As for the French approach, quality principles concerns include coherence of the learning outcomes assessed with the expectation of society and labour market. It is the reason why the competence based approach actually used in Senegal to build curriculum and learning outcomes assessed through qualifications, became a quality principle. Along the same line, consultation with labour market stakeholders became also a quality principle. That means the organisation of specific committees mixing representatives of education related to the State and social partners and/or professionals representatives (Commissions Professionnelles Consultative) is compulsory in the design process for TVET qualifications. The access to a qualification must be available after formal learning, as non-formal or informal learning. The design in terms of learning outcomes related to competences facilitates such issue. The difficulty in the process concerns the organisation of the assessment procedure which is only at an experimental stage. This presupposes the implementation of a regulatory body to provide enquiries, collection of statistics and regular evaluation of the qualification mechanism about its content and its process. Existing pathways from one system to another one are necessary in order to ensure promotion of the individuals through lifelong learning.

Higher qualifications are submitted according to the same rules and principles as those used in France. Ouality assurance is related to the Bologna process and focused on the organisation of the training in semesters and credits. Universities (public and private) are accredited by a quality assurance committee named the Madagascan and African Council for Higher Education (CAMES) which was set up in 1968 to develop cooperation between the French speaking African countries and harmonise the higher education systems across the African continent. This institution accredits the titles and degrees of universities and higher education colleges. It also evaluates researchers' work as part of their doctoral studies. Another of its roles is to establish equivalences between the vocational qualifications and university degrees. The Council is comprised of the Ministers in charge of higher education and scientific research of the Member States. Sixteen countries are members of CAMES: Benin, Burkina-Faso, Burundi, Cameroon, Central African Republic, Chad, Congo, Ivory Coast, Gabon, Guinea-Bissau, Madagascar, Mali, Niger, Rwanda, Senegal and Togo. The CAMES accreditation aims at a registration in the CAMES catalogue of each country. The owner of the degrees awarded in one of the CAMES countries is allowed to be introduced in further studies in any Members States in theory. However, as all the countries are not at the same level of organisation and involvement in this matter, the recognition of qualifications is not automatically granted.

When a public or private higher education institution or a university creates a new degree it has to request accreditation from CAMES. This request implies the preparation of a dossier and the existence of experts accredited by a General Consultative Committee. Experts examine information provided by the training in order to control the teaching conditions, the contents of the programmes and the compliance with the quality assurance criteria described in the agreement elaborated by the Council. This theme involves the Council that has organised workshops and reflection on outcomes to strengthen quality criteria and the trust from foreign countries. The Bologna process provides the basis for most of the content and process in terms of quality. Some African quality agencies are registered with the International Network of Quality Assurance Agencies for Higher Education (INQAAHE). Most investment is meant to be as close as possible to the French higher education rules and principles with attention to the quality of the teaching and, from recently, with increased attention to the impact of the degrees achieved to facilitate the transition of their recipients into the labour market.

The snqf provides an opportunity to interrogate this pre-existing scheme to research the specific principles and criteria related to the Senegalese context. The five-levels-scale structures the formal qualifications offer are themselves the target for referencing non-formal qualifications. The problem is that the criteria are not explicit enough to permit this referencing. Laws, decrees, and *arêtes* provide information related to the quality of the assessment and training process. It is also necessary to provide elements related to the quality of the qualification for each level. As in France, this quality is not related to the content of the training. It is related to the learning outcomes assessed in order to make

comparisons with non-formal qualifications and so introduce them into the framework. It is also the reason why the snqf building process in Senegal consists of two first steps:

- mapping of all existing qualifications (formal and non-formal) with a description of what the learning outcomes assessed are.
- making explicit criteria and principles which support the formal qualifications in order to define what should be in the snqf and what should not.

General qualifications are normally completed in order to permit access to further education and training. The core learning outcomes expected combine academic knowledge and methodologies giving a guarantee of capacities to understand and use more complex knowledge and methodology. In Senegal, for the elementary level specific research was undertaken to assist applicants by providing learning outcomes which relate to domestic, citizen or work situations. Such approach is supported by training and qualification designs made through a competence based approach (*approche par competences*, APC). Vocational qualifications are delivered in order to give a guarantee that an applicant has the capacities to ensure a whole occupation and not an activity alone. Learning outcomes, knowledge, skills and attitudes relate to a range of activities which can be observed in many enterprises. The main step in the design process is to define the perimeter of the qualification and the combination of activities which can be met whatever the enterprise of the organisation and is based on the French approach. French inspectors are very involved in the process. Canadian experts are also included in the training and qualification design especially to implement the APC.

Such content and objectives must be described in order to enable assessment of applicants no matter which way they complete the learning outcomes. A guideline is published with information about the assessment process and the national programme used in schools which offal under the ministries of education as TVET. They are guidelines to develop adapted programmes according to the applicants involved and the local context in which they live.

Non-formal qualifications are not completely characterised by such a scope. They generally deal with assessment of knowledge and skills related to just one or two activities. If they are expressed in terms of learning outcomes it would be easier to make comparison with formal qualifications. Eventually their contents could be considered as equivalent with a formal one, or just a part or too far to be related to an nqf. Higher education qualifications are directly linked to the French educational model and as a result are related to the European Bologna process set up in 1999. All information about their content is explained in the CAMES guidelines.

In Senegal, it could be said that reforms of TVET had an impact on the proposed snqf and not the contrary. As stated earlier, qualifications were developed with a pre-existing framework from France. They were designed on the same model with the same principles and nature of contents. At the end of the 1990s, the education reforms introduced a new policy, stressing objectives and purposes better suited to the Senegalese context. But the framework remained because the French framework was set up with the same objective which is to give legibility to qualifications against the labour market. The five levels provided, existed since the 1970s and go on to structure the formal qualification offered in terms of levels. What has to change is the content of learning outcomes for the Senegalese economic and cultural environment. The reforms made, strengthen linkages with local stakeholders and methods to analyse the needs of the economy and individuals with up to date standards. The reforms have had no real impact on the hierarchy and classification tool represented by the framework even if it is rather old.

As with the French system, the Senegalese system utilises the same qualifications references to assess all kinds of learning outcomes (formal, non-formal, informal). It is expected that the applicant demonstrate the same contents and the same nature of learning outcomes. What is different is related to the way it is demonstrated. Through initial and formal training it is possible to organise evaluation sessions in a specific manner throughout the course and through common collective examinations. Non-formal and informal learning outcomes need to develop particular supports and methods in order to enable individuals to provide evidence of the knowledge, skills and competences they gained during non-formal or informal learning. But ultimately it is the same qualification which is awarded to applicants, giving them the same rights. This approach, also directly issued from the French one is only at an experimental stage in Senegal.

The principle of developing a database in order to disseminate information is considered the best way to provide information to the wider public (individuals, education and training professionals and enterprises). But such initiative needs financial support and the design of an institutional leader to set it up. Such a responsibility cannot be undertaken out of State service and this is a problem because generally no ministry could lead another, except if this ministry falls directly under the authority of the Prime Ministry. The nature of the responsibility is not only technical. It is clearly related to a responsibility related to referencing to a social classification and this task presupposes deciding on a common format and rules to describe qualifications in the same way. But actually as the framework is pre-existing the problem is not with the classification but rather the description and the collection of information to populate the database. Higher education has its own support already existing and general education has so few qualifications that both have no real need to enter in a common repository. In fact the most important need concerns TVET with its new qualifications issued from the reform and a large range of private and non-formal qualifications offered. In 2008 the first step was to set up a Commisison d'homologation des titres et diplômes tasked with choosing the most appropriate design from the large number of proposals. This initiative did not work and the proposed snqf which had more or less the same purpose, failed too, by default of political decision and concrete commitment.

In theory, access to the certification process, presupposes that the applicant have a related qualification at a lower level. That is compulsory for higher education and general qualifications. That is less true for TVET. Pre-requirements can be modulated according to the qualification expected. Training is not compulsory in theory, however, VAE (*validation des acquis d'experience*) although planned, is not yet implemented. Most of the applicants can access to the same qualification after formal training realised in any of the training centres (applicants can come from centres which are not accredited) or after an apprenticeship contract (half in a training centre, half in an enterprise). In Senegal the credit system is not fully operational except for higher education.

Principles and methods of learning outcomes assessment are designed according to the nature or the content of the learning outcomes which have to be demonstrated. Demonstration could be: a written explicitation of the experience of the applicant with precise details on knowledge, know-how, attitudes, procedures, methodologies, tools et cetera. used for their activities; results from an observation of real or simulated working activities; interviews and presentation; provisions of productions extracted from work (press book, ICT production, et cetera); a case study or a research realisation. Academic learning outcomes are often demonstrated by written and oral examinations and vocational competencies by practical examinations. All qualifications combine a range of different examination supports in order to verify the applicants capacity to meet different learning outcomes.

The nature of the examination and the composition of the jury are defined at a national level and published by law. Examinations are organised by the DEXCO (*Direction des examens et concours*) which define the subjects of the examination, the calendar and the examinations and decide where examinations will be undertaken in the different regions of Senegal. The dates and the training centres concerned are also published in the Official Diary every year. The jury is comprised of teachers and for vocational qualifications with professionals. Both must have no linkage with applicants. In higher education, assessment is organised at the level of the University or the training centres. Methods and principles are examined by CAMES during the accreditation process.

The Senegal initiative related to establishing an nqf, is embedded in the national policy aiming at an important reform of TVET. The task of the TVET reform was given to a new Ministry of Vocational Training with the aim of developing a competence based curriculum. As in most countries, different sub-systems co-exist in Senegal with the same triplet: general (or basic) education, TVET and HE). Many different bodies develop TVET but learning outcomes are not recognised because the awarding

bodies do not belong or work with a ministry or because there is no relevant qualification. The first idea at the origin of a nqf was regulation of training provision. The creation of a *Commission d'homologation* (Training Accreditation Body) was even considered in 2008. Finally, the Minister of Vocational Training was requested to develop a nqf with the purpose of covering the full range of qualifications, including higher education.

The organisation of the formal qualifications is directly inspired from the French classification divided into a hierarchy of five levels. So it can be said that an nqf pre-exists in an implicit manner. By law, the field of qualification falls under the responsibility of the National Government. As is the case in the French tradition, only a component of the State could undertake the role of dealing with the currency of qualifications. Since it pertains to Government prerogatives, it must fall under a Minister jurisdiction. In 2009, it was therefore decided to give this authority to a component of the Ministry of Vocational Training: the Directorate for Planning and Reform. However, even if this authority could in theory extend to all the qualifications, it is very difficult to really obtain the commitment of the Ministry for Education or of the Ministry of Higher Education. Unlike the Anglo-Saxon model, the creation of an independent body cannot be used as a solution to coordinate ministerial relationships. On the other hand, it is difficult too to imagine that one ministry could manage principles or criteria for the qualifications delivered by another ministry, except if this ministry falls directly under the authority of the Prime Minister.

The challenge is now to develop awareness of this structural specificity actually related only to formal qualifications. Another challenge is to introduce criteria and principles precise and appropriate enough to give legibility to the framework, and methods to introduce non-formal qualification into it according to the Senegalese values and context. In this way the snqf may emerge as the first nqf related to a French speaking African country.