

The recognition of qualifications across borders: the contribution of regional qualifications frameworks¹

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Abstract

This brief reflective paper has been prepared as input for the UNESCO World Report on Technical and Vocational Education and Training (TVET) 2012. The paper is based on research that was conducted between 2009 and 2010 by the European Training Foundation that focused on the development of regional qualifications frameworks in Southern Africa, Europe, Asia, the Caribbean and the Commonwealth (Keevy, Chakroun and Deij 2010). Drawing on these findings and updated information from more recent developments, the paper suggests that regional qualifications frameworks are making an important contribution to the recognition of cross-border qualifications mainly through the introduction of outcome-based learning methodologies within the broader context of multilateral recognition agreements. Importantly, the paper argues that regional qualifications frameworks should not be seen in isolation, but rather in relation to an array of existing recognition methodologies, including regional conventions, as well as other multilateral recognition agreements. It is proposed that the referencing of national qualifications frameworks to a regional qualifications framework constitutes an important mechanism through which cross-border transparency, currency and portability of qualifications can be facilitated, that is, if the process is not limited to a technical exercise. The understanding of regional qualifications frameworks as “meta-frameworks” is also supported as a pragmatic mechanism to

¹ I am indebted to experts and researchers working within the different regions covered in this paper for their inputs on most recent developments, many of which have not yet been captured in the literature. Any errors or omissions are however my own. The paper does not necessary reflect the position of SAQA.

achieve regional objectives. The paper concludes by challenging those involved in improving the transparency and recognition of qualifications, including the TVET sector, to make evidence-based decisions on the further development and implementation of both national and regional qualifications frameworks.

Introduction

At the end of the 20th century a new technology for the recognition and organisation of qualifications emerged in the form of explicitly defined national qualifications frameworks (NQFs). The concept found significant traction as a result of its promising interrelationship with the renewed emphasis on *lifelong learning* in various parts of the world including the United Kingdom, Australasia and others. At the time it was argued that the strong divisions between academic and vocational systems created barriers to learning, and that there was a need to consider alternative and more integrated models. It was therefore no coincidence that early NQF developments first surfaced within the Technical and Vocational Education and Training (TVET) arena as vocational qualifications with an overt political function to transfer the control of vocational education from providers to employers (see Tuck 2007). Within the first decade of the 21st century the development and implementation of NQFs had spread to at least 130 countries across the globe. The expectations and promises associated with these NQFs were significant, despite the fact that the evidence supporting the impact of the early NQFs remained limited (Allais 2010).

The global introduction of NQFs took place at a time when the effect of increasingly globalised labour markets and the mobility of people started to impact significantly on national systems. As a result, the application of this new technology, in the form of regional qualifications frameworks, on a cross-border level soon became a logical next step, more so due to the catalytic effect of the common currency already introduced by the increasing number of countries with NQFs. At least five major world regions have subsequently embarked on the development of regional qualifications frameworks, which on this level, embody the promises of increased regional mobility and integration into international labour market schemes. The regions are: the Southern African Development

Community (SADC), the European Union (EU), the Caribbean Community (CARICOM), the Association of South East Asian Nations (ASEAN) and the small states of the Commonwealth².

While much has been written and debated about the development of NQFs, regional qualifications frameworks, more specifically the contribution of regional qualifications frameworks to promoting mobility, social inclusion and lifelong learning, remain under-researched. This paper has been prepared as a contribution to this relatively unexplored area of regional qualifications frameworks in the current global context.

The concept of a regional qualifications framework

According to the European Training Foundation (Keevy *et al* 2010: 6), and building on definitions of NQFs by the Organisation for Economic Cooperation and Development (OECD 2007) and others (see Coles 2007), a regional qualifications framework can be described as

an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved between countries within the same geographical region.

While this interpretation of regional qualifications frameworks reflects the ascendancy of regional qualifications frameworks from the NQF concept, it fails to signal the significantly different purposes of a device located at the regional level: regional qualifications frameworks usually have less regulatory and more communicative purposes than NQFs; regional qualifications frameworks also have a range of regional policies, accords, conventions and protocols supporting them, and are not underpinned by enforceable legislation; regional qualifications frameworks have limited, mostly voluntary, institutional arrangements for governance and management (Keevy *et al* 2010). While it is true to say that regional qualifications frameworks have evolved from the concept of NQFs, and

² The Pacific Register of Qualifications and Standards (PRQS), which has been under development since 2001 (Pacific Board for Educational Assessment 2008 and 2011), was not included in the original study. The PRQS does however represent another important regional qualifications framework initiative that should be taken into account in future studies.

undoubtedly also draw on the existence of NQFs, a regional qualifications framework is a very different instrument with a very different purpose.

The extent to which regional qualifications frameworks are able to meet their broader objectives to promote the recognition and transparency of qualifications across borders, mobility, social inclusion, social and economic progress, and lifelong learning, remains an important area to be measured and researched. The following five case studies of regional qualifications frameworks in different regions of the world present a basis from which such research can be conducted.

Southern African Development Community

In 1997, following the signing of the Southern African Development Community (SADC) Protocol on Education and Training, a technical committee was established to oversee harmonisation and standardisation of education and training systems within the SADC region, and included the development of a regional qualifications framework (SADC 2005). The need for harmonisation was driven by the huge diversity of education and training systems within member states, directly as a result of the different colonial legacies within the region. At the time the development of the SADC Regional Qualifications Framework (RQF) remained largely isolated from similar developments in Europe and the Caribbean, but was strongly influenced by the implementation of NQFs in South Africa, Namibia and Mauritius.

A SADC RQF Concept Document (SADC 2005: 23) completed in March 2005 brought together the various activities, and proposed that the SADC RQF would ensure good communication amongst member states as

a regional framework that consists of a set of agreed principles, practices, procedures and standardised terminology intended to ensure effective comparability of qualifications and credits across borders in the SADC region, to facilitate mutual recognition of qualifications among member states, to harmonise qualifications wherever possible, and create acceptable regional standards where appropriate.

The SADC Integrated Council of Ministers approved the development of the SADC RQF in June 2005 as a necessary tool to achieve the objectives of the SADC Protocol on Education and Training. The understanding of the SADC RQF was very broad, interpreted mainly as a 'set of agreed principles, practices, procedures and standardised terminology' (SADC 2005: 22). The period 2005 to 2011 saw very limited progress with the SADC RQF despite several attempts to maintain the momentum. These included a regional study on the benchmarking of quality assurance in 2007 (SADC 2007), the development of guidelines for quality assurance in SADC (Sabaya 2009), research into the recognition and comparability of qualifications in the region (Schmidt 2009), and the development of a qualifications portal. Most recently, and also at the time that this paper was being prepared, the SADC RQF Concept Document (SADC 2005) was reviewed and a recommendation for the establishment of the SADC RQF (SADC 2011) as a reference framework was endorsed by SADC Ministers of Education that met in Namibia on 23 September 2011. Ministers also approved the strengthening of the Education and Skills Development Unit at the SADC Secretariat, as well as vigorous advocacy and consultations on the SADC RQF with key stakeholders. SADC member states have been encouraged to upload their qualifications to the SADC qualifications portal (SADC Secretariat 2011).

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 in 2002, 2003 and 2011, remains a key supporting structure for the SADC RQF. In the case of TVET, national TVET agencies from across SADC have started to meet on a more regular basis, while in the case of higher education, a Southern African Regional University Association (SARUA) has been established.

Europe

In March 2005, following work undertaken by the European Commission, the European Union Heads of Government requested the development of a European Qualifications Framework (EQF). The EQF was envisaged as a framework that would bring together three significant areas of policy development: the Lisbon

strategy, the Copenhagen process and the Bologna process, initiated in 2000, 2002 and 1999 respectively. A consultation paper on the proposed EQF was published in July 2005 (European Commission 2005) and went through an extensive EU-wide consultation process. The proposal claimed that, like the other processes, the EQF would strengthen mutual trust and co-operation between the different stakeholders involved in lifelong learning; reduce barriers to the recognition of learning and enable learners to make better use of available knowledge, skills and competences; and enable and promote mobility of learners and labour across borders (also see Bjornavold and Coles 2009; Bjornavold and Pevec 2009).

The EQF is a “meta-framework” defined as ‘a means of enabling one framework of qualifications to relate to others and subsequently for one qualification to relate to others that are normally located in another framework’ (European Commission 2005: 13). The design of the EQF is intended to allow comparisons to be made not only between national qualifications systems or frameworks, but also between frameworks restricted to one educational or occupational sector. Such comparisons, it is argued, would form the basis for improved recognition and transfer of the learning outcomes (in the form of qualifications) acquired by individual citizens in order to ease mobility of learners and workers. The EQF has two interrelated objectives: The promotion and facilitation of regional (intra-European) mobility by increasing the transparency of qualifications throughout Europe, as well as increased portability and recognition of qualifications. Mobility is encouraged not only on a geographical level, but also between different sectors within the labour market. The EQF also aims to encourage implementation of lifelong learning within Member States through flexible learning pathways, considering the recognition of non-formal and informal learning, and breaking down barriers within education and training systems. The EQF represents an important shift towards outcomes-based qualifications through a focus on transparency within a diverse context. According to recent reports the use of learning outcomes in qualifications design is starting to impact on the traditional divides between higher education and TVET (Cedefop 2011). Cooperation takes place on the basis of differences and not in an attempt to harmonise national systems.

Thirty-four countries in Europe are making rapid progress in developing, adopting and implementing national qualifications frameworks. According to Cedefop (2011b) a number of these countries have introduced a clear distinction between levels 1-5 and levels 6-8 in line with the Bologna cycles (examples include the Danish, Bulgarian, Greek, Icelandic and Latvian frameworks). Another group of countries, including Belgium (Flanders), Austria, Cyprus, the Czech Republic and Estonia, have reached a compromise, where levels 6-8 have been divided into parallel strands. One strand covers academic qualifications, the other vocationally/professionally oriented higher levels qualifications awarded outside the 'Bologna cycles'. Importantly, Cedefop also notes that sub-frameworks are playing and will play an important role in the future development of NQFs (Cedefop 2011). Referencing of the 27 member state NQFs against the EQF has been prioritised and should be completed by the end of 2011. By 2012, it is expected that all new qualification certificates issued by the competent authorities will contain a clear reference, by way of national qualifications systems, to the appropriate EQF level.

Unintended and potential negative impacts of the EQF include the potential devaluing of traditional offerings of vocational education, additional bureaucracy, dangers in adapting to an extreme form of outcomes that overlook teaching inputs and learning conditions. The potential unintended convergence of education and training systems may also undermine the positive diversity of educational systems; in this regard a hidden kind of harmonisation is feared. The risk of referencing becoming a purely technical exercise is noted as a concern, as countries even outside of the European Union attempt to link their levels, credits and qualifications types to the EQF. The ability to compare and understand qualifications, and therefore the increased transparency of qualifications, through a technical dimension only, is viewed with extreme criticism. A key issue that national stakeholders want to be addressed at the European level is related to levels of qualifications designed to recognise learning achievements that are below the level normally represented by vocational, pre-vocational or general educational qualifications. The fact that EQF levels do not accommodate these levels has been widely raised as a concern and there are strong recommendations that this issue should be brought to the attention of the EQF Advisory Group so

that this gap in the EQF structure can be addressed when the EQF is reviewed in 2013.

Caribbean Community

The Caribbean Community (CARICOM) was established in 1973 to, amongst other objectives, improve standards of living and work, expand trade and economic relations with third States, enhance levels of international competitiveness, and achieve greater measure of economic leverage (ILO 2007). Regional heads of government that met in 1989 in Grenada decided to deepen integration of the CARICOM region through the establishment of the CARICOM Single Market and Economy (CSME). The main focus of the CSME is to provide greater opportunities for employment, investment, production and trade, competitive products, improved services, opportunities for study and work between CARICOM countries, as well as increased employment. The main elements to introduce free movement of labour include elimination of work permits in a phased approach to designated categories of wage earners (for example, non-graduate teachers, nurses and artisans), mechanisms for equivalency and accreditation (mainly through the development of occupational standards and regional occupational certification and closer association between national training agencies), as well as the development of a skills register. The CSME was created in 2008 (CARICOM 2008) and has since had a direct effect on the labour market and recognition of qualifications.

Following agreement on a CARICOM Regional Strategy for TVET as early as 1990, and the adoption of a competence model for TVET in 2002 by the CARICOM Council for Human and Social Development (COHSOD), the basis was laid for a CARICOM-wide TVET strategy based on the first NQFs in the region developed in Jamaica, Trinidad and Tobago, Barbados and Belize. At this stage the decision was made to structure vocational qualifications around five occupational levels. As noted by Dunn-Smith (2009), the threat of open borders, the need to improve the quality of the workforce required for modernisation, and the fact that enterprises required workers with much higher levels of education and training all contributed to the demand for a regional TVET qualifications framework that would, in theory, be able to improve progression routes, modernise qualifications, ensure parity of esteem between vocational and academic routes, and promote transparency, comparability, transferability and recognition of skills and qualifications.

The Caribbean Association of National Training Agencies (CANTA) was established in 2003 and endorsed by CARICOM as the implementation arm of the regional coordinating mechanism for TVET. The key purpose of CANTA was to establish and govern a regional training and certification system, called the Caribbean Vocational Qualifications (CVQs), to ensure standard and uniform delivery of competency-based training TVET within the CSME (CARICOM 2007). As part of this mandate CANTA was tasked to ensure acceptance and recognition of qualifications throughout the Caribbean and internationally.

The CVQ Framework (CARICOM 2009) stands out as a regional initiative that has been developed well beyond the conceptual stage. Unfortunately the uptake of the qualifications remain low with only three of the 15 member states currently able to issue CVQs, although procedures are currently being put in place for additional member states to participate (CARICOM 2010). To date, it is not evident that the framework has been able to achieve its ambitious goals of increased parity of esteem between vocational and academic routes, transparency, comparability, transferability and recognition of skills and qualifications.

Association of South-East Asian Nations

The Association of South-East Asian Nations (ASEAN) Framework Arrangement on Services was signed in 1995. The Arrangement is aimed at substantially eliminating restrictions to trades in services among ASEAN countries in order to improve efficiency and competitiveness, consistent with the General Agreement on Trades and Services (GATS). The intention is to establish an ASEAN Economic Community (AEC) in order to 'make ASEAN a single market and production base with free flow of goods, services, investment, skilled labour and freer flow of capital by 2020' (APEC 2003: 1). Mutual Recognition Arrangements (MRAs) for qualifications in major professional services were also initiated to enable the qualifications of professional service suppliers to be mutually recognised by signatory Member States.

In 2007 the ASEAN Economic Blueprint (ASEAN 2007) was signed which set out concrete steps to be taken to achieve a free flow of services by 2015, five years earlier than originally intended. The blueprint emphasises the realisation of

the AEC, first called for in 2003, through multiple areas of cooperation, including the recognition of professional qualifications (ASEAN 2007). An important component of the blueprint was the creation of the free flow of skilled labour through 'harmonisation and standardisation' (ASEAN 2007: 18). In this case, enhanced cooperation between members of the ASEAN University Network (AUN) to increase the mobility of staff and students was encouraged, as well as the development of core competencies and qualifications required in priority service sectors.

The ASEAN Framework Arrangement for the Mutual Recognition of Qualifications (ASEAN 2007b) was signed in 2007 by ten ASEAN Member Countries as a broad framework wherein MRAs for surveying professionals could be developed between competent authorities (designated government regulatory bodies or their authorised agencies) in charge of regulating the practice of surveying services and registered/licensed surveyors (*Ibid*). It is probably inappropriate to categorise the ASEAN Framework Arrangement as a regional qualifications framework. At best the arrangement can be described as a pre-qualifications framework approach that relies on bi- and multilateral agreements, and to some extent on trade agreements (see Paryono 2011).

The Malaysian NQF is one of the most advanced NQFs in the ASEAN region (APEC 2009). The Malaysian NQF is viewed as a catalyst for NQFs within the region and the Malaysian Qualifications Agency is receiving numerous requests for internships and study visits by other member states. Amongst the other ASEAN countries some have not yet established quality assurance bodies, and have not started to develop NQFs. In particular, Indonesia and Singapore have made significant progress towards establishing NQFs.

The extreme differences in infrastructure, economic development and wide regional distribution in ASEAN are viewed as serious limiting factors influencing not only NQF development in member states. As some early moves are being made to benchmark emerging NQFs amongst ASEAN countries, the viability of an ASEAN Regional Qualifications Framework is also being considered. In 2011 a process was initiated to develop a concept design for the ASEAN Regional Qualifications Framework (RQF) as a common reference framework that will serve as a

translation device for participating ASEAN countries. The ASEAN RQF is being proposed as an enabling framework that will include all sectors of education. Work has recently commenced on a consultation across most ASEAN countries on the development of an ASEAN RQF. Countries are also developing implementation plans to reference their NQFs to the ASEAN RQF, while also focusing on capacity building for NQFs and national quality assurance systems (Vickers 2011).

Commonwealth

On request of Commonwealth Heads of State, the Commonwealth of Learning (COL) initiated the development of a Virtual University of Small States of the Commonwealth (VUSSC) in 2003. Premised on a virtual mode for distance education, expected to improve access to educational opportunities, enhance the quality of teaching and reduce costs, the VUSSC uses English as a common language when working across borders. In addition, all participating VUSSC countries are small states that share at least some common challenges in the face of globalisation and the increased mobility of highly skilled professionals. The 34 participating VUSSC countries are located across the globe within at least six regional groupings (SADC, Economic Community of West African States [ECOWAS], Common Market for Eastern and Southern Africa [COMESA], EU, ASEAN and CARICOM).

The challenges of transnational recognition of the VUSSC courses soon became important (see West 2007; West & Daniel 2005 and West & Daniel 2007). In 2008 a concept document for a Transnational Qualifications Framework (TQF) was developed (COL and South African Qualifications Authority [SAQA] 2008) which outlined the purpose, premised on the requirement that mechanisms need to be created to support the comparison of qualifications and transfer of credits between small states for VUSSC qualifications.

The TQF is described as a qualifications framework that relates to qualification frameworks on other levels, such as the TVET sectoral framework in Jamaica, national frameworks such as in Namibia, and to regional qualification frameworks such as the EQF. It is proposed that most TQF qualifications will form a subset of qualifications already registered elsewhere, although this does not exclude the development of “unique” qualifications as part of the VUSSC process.

Emphasis is placed on the need for all qualifications, including those developed independently for the VUSSC, to 'be registered on at least one national qualifications framework' (COL & SAQA 2008: 99). Emphasis is placed on the TQF as translation instrument with no regulatory capacity, and hence, the need for TQF to rely on existing qualification frameworks. The TQF is defined as

a translation instrument for the classification of VUSSC qualifications according to set criteria for specified levels of learning achieved, to improve credit transfer and promote common accreditation mechanisms between participating VUSSC countries (COL & SAQA 2008: 100).

The TQF is proposed as an enabling framework that will improve transparency through the development of a transnational registry of qualifications that will provide information on VUSSC qualifications following a set format, and in accordance with a broad agreed set of transnational qualifications criteria. The promotion of comparability of quality assurance mechanisms between participating VUSSC countries is proposed through the development of a set of broad transnational quality assurance criteria:

In support of the vision, functions and core activities of the VUSSC, the TQF will not be a qualifications framework in the conventional more bureaucratic sense; instead it will be a "virtual" translation instrument housed within a web portal requiring minimal human and financial resources (COL & SAQA 2008: 102).

A Management Committee for the TQF was appointed in October 2008 comprising two representatives from each of the three main regions wherein the 34 countries are located. The Management Committee organised three regional cluster meetings during 2009 in Africa, Asia-Pacific and the Caribbean, and has recently completed an implementation plan for the TQF (COL 2010, see also COL 2008 and 2009).

The increased mobility of students in Commonwealth countries, more so from small states to larger and more developed countries, has been an area of concern. As a result, a key purpose of the VUSSC has been to try and offer a counterbalance in that individuals in small states would be able to find the most

appropriate education and training opportunities within the grouping of small states, rather than being drawn outwards due to a lack of opportunities.

Because the TQF is not limited to countries in geographical proximity it does not benefit directly from the conventions and agreements that exist within regions, such as in SADC (Arusha Convention and the SADC Protocol on Education and Training), EU (Lisbon Strategy), the Caribbean (CARICOM Single Market and Economy) and in ASEAN (the Framework Agreement on Services). The TQF is, however, directly influenced by global processes such as the General Agreement on Trades and Services (GATS).

The TQF was officially launched in 2010 in Namibia. In 2011 work was initiated to register the first qualifications on the TQF. Standards for two VUSSC courses have subsequently been developed by the Seychelles Qualifications Authority for this purpose.

The contribution of regional qualifications frameworks to existing cross-border recognition methodologies

The five case studies suggest that regional qualifications frameworks have moved beyond the initial conceptual stages in a relatively short period since 2005. While the case studies do not yet provide adequate evidence to support the often ambitious goals set out by each of the regional qualifications frameworks to promote the recognition and transparency of qualifications across borders, mobility, social inclusion, social and economic progress, and lifelong learning there is one area that is gradually being impacted, namely cross-border recognition methodologies.

The national character of qualifications is increasingly being challenged by globalisation and the mobility of people, and as a result, is increasingly being located in national qualifications frameworks, and more recently, also within the context of regional qualifications frameworks. These modern-day qualifications do not only act as proxy for the skills, knowledges and competences of an individual, they also take the form of a currency that signals national and international value.

The key to making these skills, knowledges and competences more fungible lies in the extent to which the qualifications can be recognised across borders.

According to the ILO (2007) at least three types of recognition exist: unilateral (independent assessment by the receiving country), mutual (agreements between sending and receiving countries), and multilateral (mostly between a regional grouping of countries). The current most prevalent form of recognition is of the unilateral type and is mostly located within the domain of credential evaluation agencies which in the main have not yet moved towards the application of outcomes-based methodologies (see Netherlands Centre for International Recognition and Certification [NUFFIC] 2010 and Keevy 2010). There are several drawbacks to this form of recognition and governments have been encouraged by the ILO and others to move towards more equitable mutual recognition agreements to ensure that migrants are able to practice the skills they have acquired in their own countries (Global Commission on Migration 2005). The ASEAN Framework Agreement discussed earlier in this paper is an example of such a mutual recognition agreement. On the third level, recognition takes place on a multilateral basis. The regional qualifications frameworks in SADC, the EU, CARICOM, and to some extent in the Commonwealth, are examples of this type of recognition. Multilateral agreements are, however, not limited to regional qualifications frameworks. As has been the case in Europe, other options, such as the directive on the recognition of professional qualifications, are also possible. Other examples include international agreements, such as the Washington Accord for the recognition of engineering qualifications, and regional conventions, such as Arusha in Africa and Lisbon in Europe, for the recognition of higher education qualifications.

A number of important points should be made with regard to the contribution of regional qualifications frameworks to recognition methodologies. Firstly, regional qualifications frameworks should not be viewed in isolation from existing approaches. Just as NQFs are increasingly being understood as relational devices (Keevy and Bolton 2011), regional qualifications frameworks contribute to existing qualifications recognition mechanisms in a relational way. All the case

studies clearly illustrate the interdependence between existing regional initiatives and the emerging regional qualifications frameworks.

Secondly, regional qualifications frameworks are overtly introducing an outcomes-based learning approach at the international level (Cedefop 2011). Just as NQFs have introduced learning outcomes for the recognition of knowledge, skills and competences within countries, regional qualifications frameworks contribute to the recognition of qualifications based on learning outcomes across borders. Stated differently, regional qualifications frameworks have done for recognition of qualifications across borders what NQFs have done for recognition of learning within countries. This is not to say that the introduction of learning outcomes has been without controversy; on the contrary, there is growing consensus that outcome statements are limited in the extent to which learning in all its guises can be described (Keevy and Jansen 2010). In this regard it is important to acknowledge that new technologies, be it qualifications frameworks or learning outcomes, or as is currently the case, outcomes-based learning qualifications frameworks, will always be limited in the extent to which they can address current challenges. New technologies are not implemented because they solve all problems, but rather because they present the most feasible alternative at that specific point in history.

Thirdly, there is no doubt that regional qualifications frameworks are impacting directly on the form and function of NQFs in the respective regions. The EU is a case in point as noted by Castejon (2011: 1):

The advent of the EQF has made a difference in the way neighbouring countries of the European Union are looking at their qualification systems and in the way they want to reform these systems.

This interrelationship between NQFs and regional qualifications frameworks is an important phenomenon that is creating a domino effect within member states to develop NQFs, increasingly in a manner that mirrors the design of the regional qualifications framework, but potentially also at the expense of a recognition of the national context in the member states (see also Pilz and Rasch

2010 for an account of the development of the German NQF after the introduction of the EQF). While this trend is most observable in the European situation due to the EQF being more advanced, it is highly likely that at least SADC and ASEAN will follow the same trend.

Lastly, referencing of an NQF to a regional qualifications framework presents a useful practical application that should be able to facilitate the recognition of cross-border qualifications. The notion of referencing represents a critically important point of development as it entails practical application of models that up to that point may have remained abstract and amorphous (see *Qualifications Frameworks in the United Kingdom* 2009). It is here that the strengths and weaknesses of the frameworks become more obvious, it is also here that the development of trust between countries and regions is solidified. It is for this reason that referencing should be understood beyond a simple technical exercise of matching levels, credits and qualification types, to a process wherein different stakeholders are able to participate in a social process that allows for objective and external scrutiny of national systems that in the past may have been closely guarded and protected by each country.

Looking to the future

Recent studies are showing that qualifications are changing in form but not necessarily in function, and as a result, a huge change in recognition of qualifications nationally or internationally is not expected (see Cedefop 2009). Even so, there is no doubt that the outcomes-based learning approach inherent in national and regional qualifications frameworks are having an impact on the way in which recognition of qualifications is understood and are gradually contributing to the development of new technologies for recognition of qualifications across borders.

Just as with NQFs, regional qualification frameworks are also associated with key challenges and promises. As a result of the more recent occurrence of the regional qualifications frameworks, these challenges and promises are less documented, yet it cannot be disputed that they exist. The introduction of the concept of a “meta-framework”, specifically in the context of the EQF (European

Commission 2005, also see Tuck *et al*/2005), is important as it offers an example of how some of the challenges are being addressed. It is evident that the loose, unified, communicative, and consultative configuration of characteristics represented by the meta-framework idea offers a more pragmatic mechanism to achieve regional objectives. In particular, the meta-framework concept has in many ways attempted to avoid many of the key problems and issues associated with NQFs: the purpose is clearly defined and understood; the real benefits to all sectors are more clearly identifiable; differences between different types of education and training are accommodated; financial and human resources may be more accessible; communities of trust are developed; governance is made possible through regional representation; and the design of the framework is flexible and pragmatic.

The evidence to support the impact of qualifications frameworks, be they national or regional, remains limited (Evans-Klock 2011). The extent to which a regional qualifications framework can promote the recognition and transparency of qualifications across borders, mobility, social inclusion, social and economic progress, and lifelong learning remains by and large a promise. Paradoxically, the development and implementation of both national and regional qualifications frameworks continue unabated. This situation is not sustainable and calls for action from all involved, including also the main international agencies that play an important role in advocating and/or discrediting new technologies. The question that must be asked is whether qualifications frameworks are inherently flawed, that is, they will never be able to deliver on their objectives, or, if the technology is appropriate, and that the focus must rather be on the evidence that must be collected.

Two scenarios present themselves in this regard: firstly, there is an option to recognise that qualifications frameworks are a passing fad that will sooner or later discontinue; secondly, to recognise that qualifications frameworks are the best technology available. In the first case it will be best to seriously explore alternative options to outcomes-based qualifications frameworks, while also warning countries and regions of the limitations. The availability of donor funding in developing countries for the development of qualifications frameworks should be curtailed, while countries should be discouraged from investing their own

funds. In the second scenario, considerable work needs to be done to better understand qualifications frameworks and to develop methodologies that can measure their impact. Studies in Scotland (Scottish Executive 2005), Ireland (National Qualifications Authority of Ireland 2009), South Africa (see Keevy and Bolton 2011), and by the ILO (Allais 2010) provide a useful basis for this purpose.

The argument that it is too soon to evaluate the impact of qualifications frameworks has now become tired. Decisive action is needed to either support the development of this new technology in meaningful way, or alternatively, to cut our losses and “end the dance”. The continued development of more than 130 NQFs and five regional qualifications frameworks seems to suggest that the world has made up its mind on this matter.

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