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REPORT BASED ON THE ANALYSIS OF INDIVIDUAL COUNTRY 2007 STOCKTAKING SUBMISSIONS ON THE IMPLEMENTATION OF NATIONAL QUALIFICATIONS FRAMEWORKS

Supplemented by additional information from the European Universities Association [EUA] 'Trends V Report - Universities Shaping the European Higher Education Area', The National Union of Students in Europe [ESIB now ESU] report 'Bologna with Student Eyes', Eurydice DG EAC report 'Focus on the Structure of High Education in Europe 2006/2007 - National Trends in the Bologna Process', and the BFUG working group report 'National Qualifications Frameworks –'Development and Certification'.

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1. Introduction

The national Stocktaking submissions on the implementation of national qualifications frameworks reveal a number of important issues that make their further analysis useful and timely for the Council of Europe Forum on Qualifications Frameworks 11-12 October 2007.

The decision to embrace qualifications frameworks and the notion of a national and an overarching Framework for Qualifications of the European Higher Education Area (EHEA) was adopted in the 2005 Bergen Communiqué 2005.

> *'We adopt the overarching framework for qualifications in the EHEA, comprising three cycles (including, within national contexts, the possibility of intermediate qualifications), generic descriptors for each cycle based on learning outcomes and competences, and credit ranges in the first and second cycles. We commit ourselves to elaborating national frameworks for qualifications compatible with the overarching framework for qualifications in the EHEA by 2010, and to having started work on this by 2007.'*[1]

The task of creating national qualifications frameworks (NQF) compatible with the overarching framework was never going to be easy for a number of reasons. There are relatively few countries that have experience of developing such frameworks based on learning outcomes, level/cycle descriptors, credits, profile, and those that do have them took many years to create them.[2]

The difficulty of this aspect of the Bologna developments was acknowledged by the Ministers in London 2007:

> *'We note that some initial progress has been made towards the implementation of national qualifications frameworks, but that much more effort is required. We commit ourselves to fully implementing such national qualifications frameworks, certified against the overarching Framework for Qualifications of the EHEA, by 2010. Recognising that this is a challenging task, we ask the Council of Europe to support the sharing of experience in the elaboration of national qualifications frameworks. We emphasise that qualification frameworks*

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[1] Bergen Communiqué, page 2.

[2] According to the 2007 Stocktaking scorecard just seven of the 48 Bologna countries have a national qualifications framework in line with the framework for the EHEA in place and only two of those have undergone the self-certification process.

> *should be designed so as to encourage greater mobility of students and teachers and improve employability.'* [3]

National qualifications frameworks are relatively straightforward in that they are:

> *'the single description, at national level or level of an education system, which is internationally understood and through which all qualifications and other learning achievements in higher education may be described and related to each other in a coherent way and which defines the relationship between higher education qualifications.'* [4]

The overarching Framework for Qualifications of the European Higher Education Area also enjoys an uncomplicated definition:

> *'an overarching framework that makes transparent the relationship between European national higher education frameworks of qualifications and the qualifications they contain. It is an articulation mechanism between national frameworks.'* [5]

However, such simplicity masks real complexities involved in the creation of national qualifications frameworks and the overarching meta-framework and the relationship between the two.

It is important to recognise that the creation of national qualifications frameworks is in many ways just the start of any educational reform process. It must be emphasised that in the Bologna context qualifications frameworks are just a tool primarily designed to facilitate educational reform through the creation of new qualifications and the re-consideration and renewal of existing qualifications. Qualifications frameworks should not be regarded in isolation. They sit alongside and are intimately linked to, national and international, approaches to quality assurance, curriculum reform, recognition, mobility, transparency, etc. The various Bologna reforms (Action lines) should not be seen as isolated free-standing developments but as aspects that integrate into an emerging Bologna educational infrastructure. The Bologna reforms represent a fundamental transformation in academic cultures from an input- to output-focus that will take considerable time fully to permeate our higher education systems. This was recognised in the London Communiqué:

> *'There is an increasing awareness that a significant outcome of the (EHEA) process will be a move towards student-centred higher education and away from teacher driven provision. We continue to support this important development'* [6]

The Bologna commitment to elaborating national qualifications frameworks compatible with the overarching framework by 2010 is highly ambitious and certainly just adopting a new qualifications framework is relatively easy compared with their practical implementation. Although at first sight, qualifications frameworks are not a subject to excite interest they play a vital role in any educational reform process.

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[3] London Communiqué, section 2.8.

[4] BFUG Working Group report (2005) *A Framework of Qualifications of the European Higher Education Area*, page 30: http://www.bologna-bergen2005.no/Docs/00 Main_doc/050218_QF_EHEA.pdf

[5] Ibid, page29.

[6] London Communiqué, section 2.1.

National qualifications frameworks are devices tailored to national requirements. They are crucial to the realisation of the following Bologna ministerial pledge:

> *'We reaffirm our commitment to increasing the compatibility and comparability of our higher education systems, whilst at the same time respecting their diversity.'*[7]

In the 2007 Stocktaking report under 'future challenges mentioned in national reports' national qualifications frameworks and outcomes-based qualifications are mentioned in 35% of reports - coming joint 5th in the list of perceived important challenges.[8] The Stocktaking report notes:

> *'From the results on indicator 3 (Implementation of national qualifications frameworks), it is clear that while work has indeed started, it is not very advanced in most countries. As this is a relatively new element of the Bologna Process, there may be confusion and even resistance to the notion of a national qualifications framework. The benefits of a framework for learners, higher education institutions and the economy may not yet be fully recognised in some countries.*[9]

The analysis in this report and the Council of Europe's Forum is an immediate response to the 2007 London Communiqué. It also designed to help achieve the specific recommendations identified in the 2007 Stocktaking report urging countries to:

> *'Work towards fully implementing a national qualifications framework based on learning outcomes by 2010.*
> *Link the development of the qualifications framework to other Bologna action lines, including quality assurance, credit transfer and accumulation systems, lifelong learning, flexible learning paths and the social dimension.'*[10]

2. Progress - nature and trends

It is clear from the Stocktaking report that there has been considerable progress in relation to qualifications frameworks over a relatively short time period. Countries are obviously at varying stages of evolution. The following table is adapted from the 2007 Stocktaking Report (indicator 3) and follows the scorecard colours:[11]

[7] London Communiqué section 1.4.
[8] 2007 Stocktaking Report, table 5, page 46.
[9] 2007 Stocktaking Report, page 50.
[10] 2007 Stocktaking Report, page 54.
[11] 2007 Stocktaking Report, page 16, indicator 3. Dark green indicates most developed and red the least developed.

TABLE 1: IMPLEMENTATION OF NATIONAL QUALIFICATIONS FRAMEWORKS

Dark Green (7)	**Seven countries have a national QF in line with the overarching QF for EHEA in place**
Light Green (6)	**Six countries have a proposal for a NQF in line with the overarching QF for the EHEA which has been discussed with all relevant stakeholders at the national level and a timetable for implementation has been agreed**
Yellow (11)	**Eleven countries have a proposal for a national QF prepared in line with the overarching QF for the EHEA**
Orange (23)	**Twenty three countries have begun a development process, including all the relevant national stakeholders, leading to definition of national QF in line with the overarching QF for EHEA**
Red (1)	**In one country work has not started at establishing national QF in line with the overarching QF for EHEA**

The overall picture appears positive but there are a number of immediate points to be made. Most of the countries in the dark green category started developing their national frameworks before 2005 and many of these have take over ten years to get to the present stage. It is noteworthy that of the seven (dark green) countries that have national qualifications frameworks in line with the overarching Framework for the EHEA, all but one (Portugal) are from North-Western Europe. There is also some correlation as to how these countries scored in the other eleven categories – all scoring highly. This underlines the perhaps obvious but important point that progress with degree systems, quality assurance, recognition, lifelong learning and joint degrees-goes in tandem.

It is clear that a national framework can be created relatively quickly (and where appropriate, legislation put in place) but this may not be as positive as it appears if a hurried creation leads to a qualifications framework that cannot achieve what it was designed to in the long-term and also not successfully undertake the self-certification process in the medium-term.

The comprehensive answers submitted on the implementation of national qualifications frameworks (Stocktaking, section 10) of the 48 individual Stocktaking reports12 have been transposed to a summary TABLE 2 below.
This table must be interpreted with some caution. There is a huge range in the detail provided by different answers to the section 10 questions, varying from a total of 20

[12] The full set of national reports can be found at: http://www.aic.lv/ace/ace_disk/2005_07/Nat_reps/index.htm

words to over 800, consequently it is not easy to compare data. Some of the answers betray a fundamental misunderstanding of the questions and in a few cases are misleading. Furthermore, the definition and understanding of some key terms is problematic. The actual distinction between the European Qualifications Framework for Lifelong Learning (EQF)F and the overarching Bologna EHEA framework is sometimes confused. The understanding of outcomes-based qualifications descriptors is not uniform and the meaning and range of application of learning outcomes is not shared in common. There is insufficient clarity about the stages in the process of creating and implementing national qualifications frameworks. However, despite these caveats and difficulties it is possible to make the following points:

- 29% countries indicated they had NQF legislation and enabling legislation in place or partly in place;
- 19% countries reported they had finalised stakeholder agreement;
- 94% countries definitively indicated they had established NQF working groups;
- 31% of countries indicated they had 'outcomes based qualifications descriptors' and a further 23% had them in preparation or partly in place. However, the understanding of national qualifications descriptors is not clear - many appear to view these simply as the adoption of the Dublin descriptors, whilst other referred to more detailed country-specific descriptors (generic and/or subject-specific);
- 64% countries indicated they had an implementation timetable agreed but it is not often clear what they understood by implementation - the creation of an NQF, its piloting, self-certification and/or its full implementation impacting on all qualifications;
- 25% countries indicated that stakeholders were 'being consulted' and in 27% countries indicated they 'had been consulted'. The level and nature of consultation appears to vary but too little concrete and consistent information is provided to draw strong conclusions. Only a few countries indicated that they viewed ongoing consultation as important.

Little more can be drawn from the analysis of these inconsistent and uneven national reports. It must be remembered that the stage of development has progressed for many countries since report were submitted 2006-2007. There are some lessons to be learnt about the precision of information and the nature of questions to be asked in the next Stocktaking exercise 2007-2009.

TABLE 2: IMPLEMENTATION OF NATIONAL QUALIFICATIONS FRAMEWORKS

Table based on information provided in the national stocktaking reports 2007of multi-part answers to question 10.
NOTE: a blank space indicates no information or no suitable information provided.

COUNTRY	THE EXTENT TO WHICH YOUR NATIONAL QUALIFICATIONS FRAMEWORK IS IN LINE WITH THE FRAMEWORK FOR QUALIFICATIONS OF THE EHEA	THE STAGE OF DEVELOPMENT OF YOUR NATIONAL QUALIFICATIONS FRAMEWORK					THE ROLE OF STAKEHOLDERS IN THE DEVELOPMENT OF YOUR NATIONAL QUALIFICATIONS FRAMEWORK
		Legislation in place	Stakeholder agreement finalised	Working group established	Outcomes based qualifications descriptors	Implementation on timetable agreed	
Albania	**Orange**			✓		✓	Being consulted
Andorra	**Orange**						Being consulted
Armenia	**Orange**			✓		✓	Being consulted
Austria	**Orange**			✓		✓	Being consulted
Azerbaijan	**Red**						
Belgium FL	**Light Green**			✓	✓	✓	Being consulted
Belgium FR	**Orange**			✓	✓(in part)	Not agreed	
BiH	**Yellow**		✓ (in process)	✓	✓		Being consulted
Bulgaria	**Light Green**	✓ (in part)			✓	✓	Consulted + ongoing
Croatia	**Yellow**		✓	✓	✓(in preparation)	✓	Consulted
Cyprus	**Orange**			✓			Being consulted
Czech Rep	**Yellow**	✓ (in part)		✓		✓	Being consulted

Denmark	**Dark Green**	✓	✓	✓	✓	✓	Consulted
Estonia	**Orange**			✓		✓	Beig consulted
Finland	**Yellow**		✓	✓	✓	Not decided	Consulted
France	**Orange**	✓ (in part)					
Georgia	**Orange**						Being consulted
Germany	**Dark Green**	✓ **(**Länder)	✓	✓	✓	✓	Consulted
Greece	**Orange**			✓			Being consulted
Holy See	**Orange**			✓		✓	Being consulted
Hungary	**Light Green**			✓	✓	✓	Consulted
Iceland	**Dark Green**	✓	✓	✓	✓	✓	Consulted
Ireland	**Dark Green**	✓(self-certif..)	✓	✓	✓	✓	Consulted
TABLE 2 (contiued) **COUNTRY**	**THE EXTENT TO WHICH YOUR NATIONAL QUALIFICATIONS FRAMEWORK IS IN LINE WITH THE FRAMEWORK FOR QUALIFICATIONS OF THE EHEA**	**THE STAGE OF DEVELOPMENT OF YOUR NATIONAL QUALIFICATIONS FRAMEWORK**					**THE ROLE OF STAKEHOLDERS IN THE DEVELOPMENT OF YOUR NATIONAL QUALIFICATIONS FRAMEWORK**
		Legislation in place	Stakeholder agreement finalised	Working group established	Outcomes based qualifications descriptors	Implementation timetable agreed	
Italy	**Yellow**	✓ (in part)		✓	✓	unclear	Consulted
Latvia	**Yellow**	✓ (drafted)		✓	✓**(**in part)	✓	Consulted + ongoing
Liechtenstein	**Orange**			✓	✓(in preparation)	✓	

Lithuania	**Orange**			✓	(under debate)	✓	Being consulted
Luxembourg	**Orange**			✓		✓ (temp halted)	
Malta	**Light Green**	✓ (in part)		✓	✓(vocational)	✓	Consulted + ongoing
Moldova	**Orange**			✓	✓**(**in preparation)	✓	To be consulted
Montenegro	**Orange**			✓			To be condulted
Netherlands	**Yellow**	NQF drafted		✓	✓		Being consulted
Norway	**Yellow**	✓ (enabling)		✓	✓(ongoing)	✓	Consulted + ongoing
Poland	**Orange**			✓		✓	To be consulted
Portugal	**Dark Green**	✓	No details	✓	✓	✓	
Romania	**Light Green**	✓**(**enabling)		✓		✓ (under dev)	To be consulted
Russia	**Yellow**			✓	✓(prof ed. only)	✓	Only employer Asso..
Serbia	**Yellow**			✓		✓	
Slovakia	**Orange**			✓			
Slovenia	**Orange**			✓			
Spain	**Orange**			✓			All to be consulted
Sweden	**Light Green**	✓	✓	✓	✓	✓	All consulted
Switzerland	**Orange**			✓		✓	To be consulted
'The Former Yugoslav Rep. of Macedonia'	**Orange**			✓	(under debate)	✓	
Turkey	**Yellow**			✓	(to be applied)	✓	To be consulted
Ukraine	**Orange**			✓		✓	Unclear all

							consulted
UK-England, Wales and N. Ireland (EWNI)	**Dark Green**	Not applicable	✓	✓	✓	✓	All consulted
UK-Scotland	**Dark Green**	Not applicable	✓	✓	✓	✓(self-cert done)	All consulted

3. The development of national qualifications frameworks - main concerns and problems:

A number of concerns and problems associated with the development of qualification frameworks are raised directly and indirectly in the Stocktaking report. It is worth quoting extensively from the 2007 report which makes the following important points:

> *'...countries are at varying stages of progress towards implementing a national qualifications framework in line with the framework for the EHEA that was adopted by the Ministers in Bergen. Most of the countries that are in the green category had started developing their national framework before 2005: some have taken ten to fifteen years to complete the development process and implement their framework fully. In view of this, there is a concern among some of the other countries that the goal of having national frameworks in place by 2010 might rush the national process. They recognise that while the principles of the framework can be introduced in legislation relatively quickly, it is likely to take some years before the framework is fully implemented.*
>
> *While national qualification frameworks that are compatible with the overarching EHEA framework will also be compatible with the European Qualifications Framework for Lifelong Learning (EQF) proposed by the European Commission, it was noted by some countries that there is confusion at national and institutional level between the framework for the EHEA adopted in Bergen and the EQF.'*
>
> *It is clear that this is an indicator where a great effort needs to be made before 2010. There is still a lot of work to be done in many countries, and there is a need to consider what kinds of collegial support can be provided through the Bologna Process to help these countries to develop their national frameworks. This might include continuation of the regional workshops started in the 2005-2007 period, having an appropriate international organisation or network to facilitate meetings and the creation of an expert pool, as suggested by the Qualifications Frameworks Working Group.*
>
> *Developing national frameworks of qualifications will bring together a number of strands of the Bologna Process, all of which are based on a learning outcomes approach: quality assurance; credit transfer and accumulation systems; recognition of prior learning; lifelong learning; flexible learning paths and the social dimension.'*[13]

These general conclusions and points identified in other reports14 raise a number of important points summarised below:

3.1 Multi-speed progress

Speed of progress towards creating compatible and comparable qualifications frameworks varies with the majority of the most advanced (dark green on the

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[13] Source: pages 16-17, 2007 Stocktaking Report.

[14] The EUA 2007 'Trends V Report', the BFUG working group report 'National Qualifications Frameworks - Development and Certification', May 2007, etc.

Stocktaking system) having taken considerable number of years to get to the stage they are.

3.2 Relationship between the meta-frameworks and national qualifications frameworks

Several of the countries with the most developed national qualifications frameworks have found it useful to develop levels within the Bologna cycles. These are designed to accommodate intermediate qualifications, promote clear progression and give precise guidance to academics, employers and citizens. There is a danger that some countries regard the adoption of the generic Dublin cycle descriptors as sufficient national descriptors for the purposes of programme development and quality enhancement. It must be remembered that the Dublin descriptors are quite general in nature and one of their primary functions is to aid the creation of more detailed national qualifications frameworks. There are possible misunderstandings as to the respective roles of meta-frameworks and national frameworks. [15] The EHEA meta-framework acts as a translation device between national frameworks and is not designed to act as a substitute for a national framework.

3.3 Timescales

The goal of having national qualifications frameworks in place by 2010 could lead to the process being rushed for some countries with the result of flawed qualifications frameworks being created. Furthermore, there is evidence that some countries have a simplistic view of national qualifications frameworks as something just to be enacted in legislation and not designed to help achieve a number of important and unique national goals16.

3.4 Framework confusions

There is potential confusion and concern about the relationship between the European Qualifications Framework for Lifelong Learning (EQF) and the Bologna Framework for Qualifications of the EHEA, although, the London Communiqué indicated that:

> 'We are satisfied that national qualifications frameworks compatible with the overarching Framework for Qualifications of the EHEA will also be compatible with the proposal from the European Commission on a European Qualifications Framework for Lifelong Learning.' 17

There remains an unease that the two frameworks may diverge in their understanding and use of credits as well as to which countries should articulate their national qualifications frameworks. The ministers in London clearly indicated the Framework for the EHEA is the one to which all higher education in Bologna countries must articulate. It is evident that several countries in their reports have indicated they will articulate with the EQF and do not mention self-certification with the Bologna framework for the EHEA. The European Commission draft recommendation of the EQF to Parliament dated 7th September 2007 does not detail the mechanism by which NQF will articulate with the EQF[18]. Furthermore,

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[15] This distinction also relates to credit systems - see section 4 of this report.

[16] See the 2005 BFUG working Group report '*A Framework for Qualifications of the European higher Education Area'* section 2.3 for further elaboration. http://www.bologna-bergen2005.no/Docs/00-Main_doc/050218_QF_EHEA.pdf

[17] London Communiqué, section 2.9.

[18] This issue is to be discussed by the EQF Advisory Group starting November 2007.

articulation/self-certification to one overarching framework (either Bologna or EQF) cannot necessarily lead to automatic reciprocal recognition in the other. The two frameworks are different in emphasis: one for higher education and one for lifelong learning. These issues will need to be resolved to avoid future confusion.

3.5 Creation v implementation

Qualifications frameworks are essential for the creation of the EHEA. The London Communiqué emphasises this:

> '*Qualifications frameworks are important instruments in achieving comparability and transparency within the EHEA and facilitating the movement of learners within, as well as between, higher education systems. They should also help HEIs to develop modules and study programmes based on learning outcomes and credits, and improve the recognition of qualifications as well as all forms of prior learning.*'[19]

These multiple ambitions may well take a decade for some the Bologna signatory countries to fully realise. This needs to be recognised. The creation of NQF and then their articulation with the EHEA is only the first step in a long process. It is clear that some countries do not realise this. To be more precise, it will take many years for the implementation (not just their creation on paper) of qualifications frameworks in terms of their longer-term practical application as a tool for curricular change; an external reference point contributing to quality assurance processes; and a context for review, articulation and development of new and existing qualifications.

Their development cannot and should not be rushed for 2010 or they will be doomed to a future second stage reform to get it right. This would exasperate academic staff and alienate stakeholders.

3.6 Quality assurance and qualifications frameworks

The quality assurance aspect of qualifications frameworks is not highlighted in any feedback from those reporting on their Bologna progress. This is perhaps revealing in itself. The relationship between quality assurance mechanisms and qualifications framework building and operation is important. Trust and fair recognition between 48 independent national qualifications frameworks is facilitated by transparency (i.e. open to external scrutiny) and the existence of explicit common approaches to quality assurance. The ENQA 'Standards and Guidelines' provide this. These shared common principles, along with qualifications frameworks and other external reference points (including learning outcomes), contribute to our understanding of the national and international standards of different qualifications. The connection between qualifications, qualifications frameworks and quality assurance is such that their development and implementation is best done simultaneously. They should not be regarded as discrete aspects to be worked on in isolation. The implications of the 'Standards and Guidelines' for the development and application of national qualifications frameworks need to be made explicit.

[19] London Communiqué, section 2.7.

3.7 Support

The 2007 BFUG working group on qualifications frameworks[20] and the 2007 Stocktaking report both underlined the need for countries to offer and receive mutual support in the elaboration of their national qualifications frameworks[21]. The BFUG group also oversaw the completion of two pilot projects in Ireland and Scotland on verification of the compatibility of national qualifications frameworks with the overarching EHEA-framework. The BFUG working group report contains a wealth of useful information and insights associated with developing and certificating qualifications frameworks. It confirmed that the overarching Framework of Qualifications for the European Higher Educations Area and the procedures and criteria for verification of compatibility of national qualifications framework with the overarching framework, as adopted by Ministers in Bergen, are adequate and serve their purpose. No amendments to the EHEA framework were required. However, the report demonstrates that those attending the regional workshops found the detailed consideration of the following crucial in helping them design their qualifications frameworks: cycles and levels, profiles, award types, learning outcome/output descriptors/Dublin descriptors, credits and workload.

4. Credits and qualifications frameworks

The role of credits and their relationship to qualifications frameworks is an area of concern and potential confusion. For the 2007 Stocktaking report countries were asked to:

> *'describe the credit and accumulation system operating in your country and include:*
> - *the stage of implementation of ECTS[22] in academic year 2006/2007*
> - *the percentage of first and second cycle programmes using ECTS in academic year 2006/2007*
> - *how any other credit or accumulation system in use relates to ECTS: is it compatible'*

The following adapted table from the 2007 Stocktaking report indicates the stage of implementation of ECTS[23]:

[20] BFUG Working Group on Qualifications Frameworks (2007) *National Qualifications Frameworks Development and Certification- final report*, DfES. http://www.dfes.gov.uk/londonbologna/uploads/documents/WGQF-report-final2.pdf
[21] A task entrusted to the Council of Europe in the London Communiqué.
[22] European Credit Transfer and Accumulation System (ECTS)
[23] 2007 Stocktaking Report, page 33, indicator 10.

TABLE 3: STAGE OF IMPLEMENTATION OF ECTS

Dark Green (27)	**<u>Twenty-seven</u> countries in 2007 - ECTS credits are allocated in all first and second cycle programmes, enabling credit transfer and accumulation.**
Light Green (9)	**<u>Nine countries</u> in 2007 - credits are allocated in at least 75 per cent of the first and second cycle Higher Education programmes, using ECTS OR a fully compatible credit system enabling credit transfer and accumulation**
Yellow (6)	**<u>Six countries</u> in 2007- credits are allocated in 50-74 per cent of Higher Education programmes, using ECTS or a fully compatible national credit system enabling credit transfer and accumulation**
Orange (6)	**<u>Six countries</u> in 2007 - ECTS credits are allocated in less than 50 per cent of Higher Education programmes ....OR A national credit system is used which is not fully compatible with ECTS ....OR ECTS is used in all programmes but only for credit transfer**
Red (0)	**<u>Zero countries</u> – had no credit system in place yet**

In 56% of countries ECTS is said to be used for credit transfer and accumulation for all first and second cycle programmes. A further 31% of countries indicated they employ credits in over 50% of higher education programmes, using ECTS or a compatible credit transfer and accumulation system. The Stocktaking report concludes that ECTS is continuing to develop as a system of credit transfer and accumulation but few countries link credits to learning outcomes. However, the ESIB report24 and the Trends V Report25 present a less positive picture with a big difference between its theoretical application and actual practice on the ground There are a number of problems identified including: excess student workload; few higher education institutions expressing credits in terms of learning outcomes; failure to follow the ECTS rules and 'key features'; non-recognition of periods of study abroad, etc. There are some technical issues and some wider problems that need to be resolved around:

- ECTS credits, workload and learning outcomes;

[24] 2007 Bologna with Student Eyes, section 5.2, pages 41-44.
[25] 2007 Trends V Report, section 2, pages 34-38.

- the relationship between ECVET and ECTS;
- differences between credit transfer and accumulation and their respective tools;
- misunderstandings of the role of a meta-credit and qualifications frameworks in relation to national and local credit systems.

The Bologna Framework adopted in Bergen 2005 incorporates the European Credit Accumulation and Transfer System (ECTS) as a key instrument, informing the credit systems that operate within the national frameworks of the EHEA. ECTS provides the credit ranges for the Bologna first and second cycles. The London Communiqué in 20007 indicated that:

> *'Efforts should concentrate in future on removing barriers to access and progression between cycles and on proper implementation of ECTS based on learning outcomes and student workload.'*[26].

Credits and credit systems (ECTS in particular) have a significant role in terms of facilitating international recognition, engendering flexible (and student-centred) learning, promoting curriculum reform, increasing mobility and aiding lifelong learning (especially the recognition of informal and non-formal learning).

The Bologna Process facilitated the evolution of ECTS from its initial application as a 'credit transfer' system to that of a meta-level tool to support 'credit accumulation' as well as transfer. The European Commission and the Bologna countries have acknowledged that ECTS plays a vital role in aiding the development of higher education knowledge and skills and contributes to the economic and social success of the Europe. This development has led to a redefinition of credit. Credits now serve a number of purposes but fundamentally are a tool for quantifying and expressing the approximate volume of designated learning outcomes achieved by an individual learner at a specified level, linked to an appropriate descriptor (e.g. qualifications framework, cycle descriptor, qualification descriptor, learning context, etc.). Credits are fundamental building blocks that aid transparency, recognition and mobility. Unfortunately progress in their application has been relatively slow, difficult and uneven.

Part of the problem is that the two functions 'credit transfer' and 'credit accumulation' are linked but differ in purpose and application. This is not always understood.

Credit transfer refers to the process where the credits and grades obtained during an approved period of study away from the home institution are transferred and accepted as part of the home programme of studies - either between institutions in a national system, or between institutions in different countries (the traditional Erasmus mobility). The process whereby this transfer is organised employs the conventional tools associated with ECTS: course catalogue, learning agreement, ECTS transcripts, grade interpretation scheme, etc. Credit transfer generally refers to the recognition of lengthy periods of study (i.e. an academic year, semester, or term). Credit transfer systems (as meta-systems) tend to be less detailed in description, rules and application than accumulation systems, but they have

[26] London Communiqué, section 2.4.

particular complexities as they need to operate between different institutions, often with different profiles and curricula and diverse national settings.

Credit accumulation is more comprehensive than credit transfer in that it refers to the credit-based organisation of learning whereby credits are achieved and accumulated over time in relation to any planned programme of study, with or without a transfer element. It impacts on all students within an institution or country and not just those full-time students taking a part of their qualification in another country. The rules and processes for this accumulation function are established by the appropriate competent authority - internationally, nationally, regionally or locally - with most details being determined locally at the institutional level, e.g. regulations that govern pre-requisites, co-requisites and progression, etc. Credit systems are intimately linked to national qualifications frameworks, level descriptors, qualifications descriptors and other external reference point, indeed, Scotland has deliberately created a 'credit and qualifications framework'. The main role of credits is to increase choice and facilitate flexible modularised study pathways (multiple entry and exit points) and progression routes within and between qualifications. Credit accumulation systems, along with learning outcomes aid curriculum development and planning.

Several aspects of ECTS require more clarity: particularly the interface between ECTS as a meta-framework and national and local credit systems, and the relationship between ECTS credits workload and learning outcomes. The form and function of ECTS as a meta-credit system and its relationship with national/local credit systems is important, especially as the delineation between the two is highly significant for national and local academic autonomy. Higher education institutions and ministries would benefit from further guidance and good practice examples on these issues. The European Commission is currently reviewing and updating the ECTS Users' Guide to take account of Bologna developments.

5. Issues for consideration

The creation of 'new style' qualifications frameworks, articulated with the overarching EHEA framework, based on levels/cycles, learning outcomes, qualifications descriptors, profile, credits, workload, etc. is clearly not a simple exercise. Such a process raises numerous issues and will only be fully completed and implemented after the 2010 deadline. Experience to date has highlighted problems and confusions associated with compatibility of frameworks, potential difficulties connected with the time-scale of the whole process and a distinct European regional imbalance in the level of national progress.

On the positive side there has been remarkable progress in a relative short time. There is now more information, advice and experience available on building qualifications frameworks. Useful material on the various preliminary stages of development and approach can be found in chapter 5 of the 2007 BFUG Working Group on National Qualifications Frameworks.27 This contains a ten-stage 'stepladder' identifying stages from start of work to certification of a national framework. There is also much good practice to be gleaned from the Scottish and

[27] BFUG Working Group on Qualifications Frameworks (May, 2007) *National Qualifications Frameworks Development and Certification- final report*, DfES, chapter 5. http://www.dfes.gov.uk/londonbologna/uploads/documents/WGQF-report-final2.pdf

Irish self-certification experiences.28 In particular the following two recommendations are particularly significant:

> *'The working group recommends that in developing their National Frameworks, countries should be have a eye on the need to align the National Framework to the Bologna Framework while noting that the Framework development process and the subsequent alignment are separate processes.'*[29]

> *'The Working Group considers that countries should ensure that there is some element of testing or implementation of a national framework before the process of aligning it to the Bologna Framework is completed.'*[30]

In order to aid countries in the whole process of conceiving, creating, implementing and self-certificating their national qualifications frameworks the following conclusions are offered based on the information and analysis from the preceding sections of this report. They are in the form of a checklist of questions for consideration that countries need to ask themselves at different stages in the process:

5.1 Stakeholder consultation:

5.1.1 Have all the appropriate stakeholders been consulted (including reluctant elements) in the development of the national qualifications framework and was a consensus reached?

5.1.2 Was/is the consultation rigorous - were stakeholders fully briefed on the purposes, nature and importance of the proposed NQF - did they understand their role - what is their role?

5.1.3 Is there a mechanism for ongoing stakeholder input - a periodic review process?

5.2 Initial creation of the National Qualifications Framework (NQF):

5.2.1 Is the development period for the initial writing and finalising (gaining national consensus) of the NQF sufficient?

5.2.2 Is the national framework a 'pale reflection' or clone of the Dublin Descriptors - have all national/regional priorities, needs and realities been taken into account – what are they?

5.2.3 Has there been a dialogue with countries at a similar stage of development and facing similar challenges?

5.2.4 What will be the contribution of foreign experts to the development, verification and self-certification processes?

5.2.5 Is there a clear separation between the framework development process and the later alignment process?

5.2.6 Are there any implications for the national qualifications framework of having an educational binary divide or not between academic and professional education, and does your framework adequately cover higher level vocational qualifications?

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[28] Ibid, chapter 6.

[29] Ibid, chapter 7, page 23.

[30] Ibid, chapter 7, page 24.

5.2.7 What are the implications of the adoption of the 2005 ENQA '*Standards and Guidelines for Quality Assurance in the European Higher Education Area*' for the process of developing, verifying and self-certificating of your national qualifications framework?

5.2.8 What are the implications of the proposed framework for the rest of the national academic infrastructure?

5.2.9 Is there a need to develop national levels within the three Bologna cycles to give more precision and guidance to those who will use the national framework - what form would any further level descriptors take?

5.2.10 What are the implications of having more than one level in a national framework relating to a Bologna cycle and of having intermediate qualifications - should all qualifications give access to the next cycle?

5.2.11 Is there a clear understanding of cycles and levels, profiles, award types, learning outcome and competences, the Dublin descriptors, credits and workload?

5.2.12 How does the national qualifications framework relate to the EQF and any existing/future plans in relation to lifelong learning?

5.2.13 What is the length of your existing first and second cycle qualifications and what are the implications for your qualifications framework of retaining or changing this?

5.2.14 How have ECTS credits been articulated within the national framework and in what way does it relate to regional and local accumulation systems - what is the role of a meta-credit framework in relation to any national/local systems?

5.2.15 How does institutional academic autonomy relate to the framework - is it undermined or strengthened?

5.2.16 Does the framework facilitate student-centred learning?

5.2.17 How does the national qualifications framework articulate with, and relate to, recognition tools and with the other Bologna Action lines and what are the implications for other national and local educational approaches and policies?

5.3 Implementation of the National Qualifications Framework:

5.3.1 Is there a detailed long-term plan for the full implementation of the national framework as a tool to aid curriculum development – including a process to rigorously and transparently review existing qualifications and develop new ones?

5.3.2 How will you relate existing qualifications to the new framework?

5.3.3 Are the Tuning subject-based materials or national subject benchmark statements used to aid the implementation of the national framework?

5.3.4 Is there a common understanding of learning outcomes and student centred-learning?

5.3.5 How does the national framework employ learning outcomes - at the point of the module/unit, qualification descriptor, level descriptor and subject profile/benchmarks?

5.3.6 How doe the national framework articulate with quality assurance arrangements at local, national and international levels (ENQA Standards and Guidelines)?

5.3.7 Is the self-certification process regarded as something to be complied with or something more - will self-certification follow some sort of pilot implementation phase to test the qualifications framework?

5.3.8 Is there an ongoing planned dissemination phase where the framework and its role is publicised and explained to citizens, academics, business and professional bodies, etc?

5.3.9 What ongoing practical support is to be given to higher education institutions - how can the national Bologna Experts be trained and utilised?

5.3.10 How will higher educational institutions be encouraged to plan and implement appropriate staff development and training?

5.3.11 How will you check that the framework is successful and achieving what it was supposed to do - what indicators do you need to examine?

This list is not exhaustive but is designed to help focus attention on the multiple challenges that qualifications framework pose. Huge progress has been achieved and with continued cooperation the long-term benefits of qualifications frameworks and the full realisation of the EHEA will be achieved.

"A pessimist sees the difficulty in every opportunity; an optimist sees the opportunity in every difficulty."

Winston Churchill (1874-1965)

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