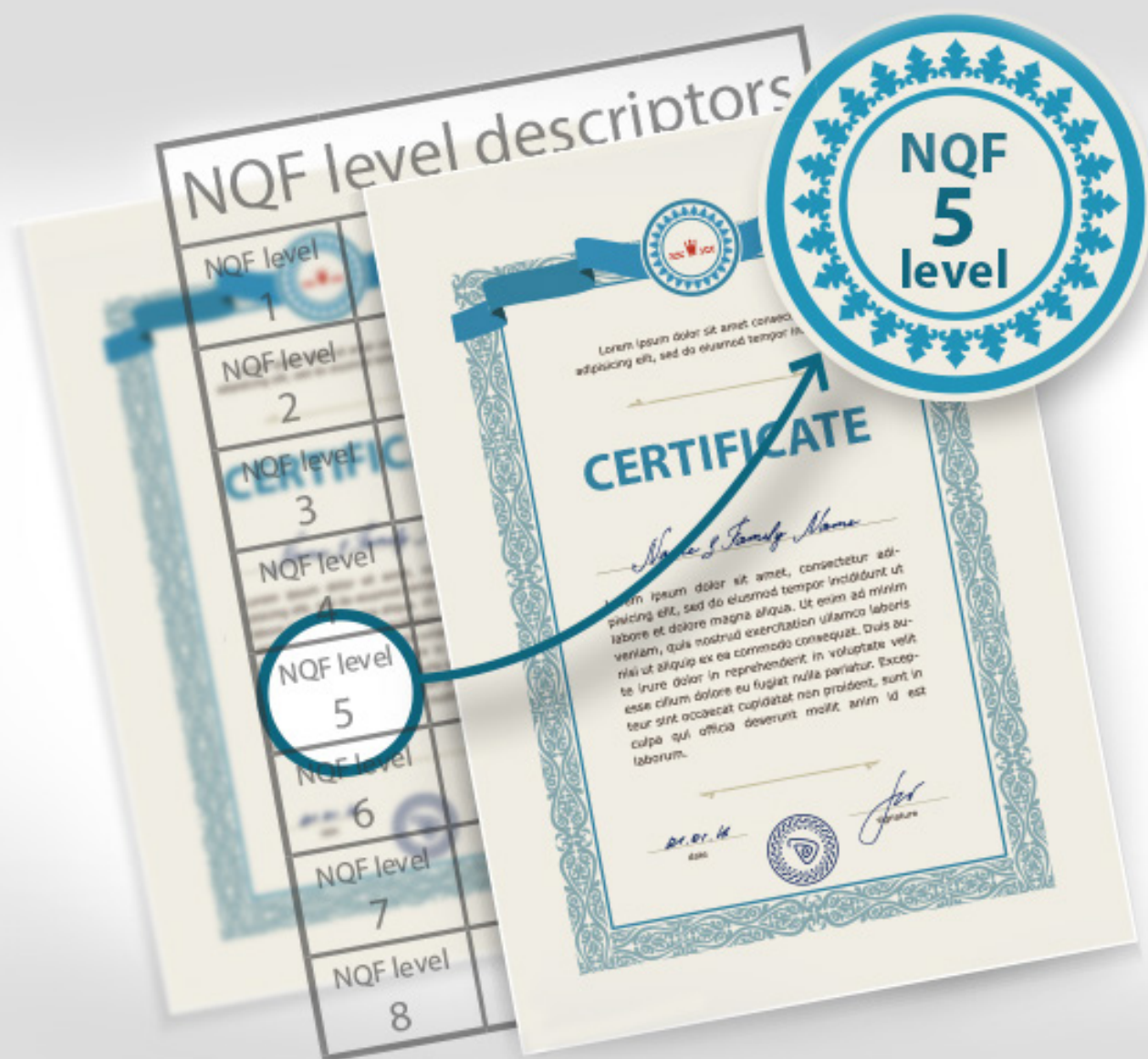


Proposed Models of Including Non-formal Sector Qualifications in National Qualifications Frameworks



Report prepared within the NQF-in Project based on an analysis and discussions of the experiences of seven European countries

Warsaw, August 2018

Title:

Proposed Models of Including Non-formal Sector Qualifications in National Qualifications Frameworks

Authors:

Horacy Dębowski

Dr. Stanisław Sławiński

Sylwia Walicka

Agata Poczmańska

Barbara Przybylska

Design and Layout:

Wojciech Maciejczyk

Graphics:

Beata Czapska

Publisher:

Instytut Badań Edukacyjnych / Educational Research Institute

ul. Górczewska 8, 01-180 Warsaw, Poland

+48 (22) 241 71 00; www.ibe.edu.pl

Please cite this publication as:

Dębowski, H., Sławiński, S., Walicka, S., Poczmańska, A. & Przybylska, B. (2018), *Proposed Models of Including Non-formal Sector Qualifications in National Qualifications Frameworks*, Warsaw: Instytut Badań Edukacyjnych.

© Instytut Badań Edukacyjnych, 2018

ISBN: 978-83-95-23-95-3-3

This publication is financed by the European Union through the Erasmus+ Programme as part of the project entitled *Developing organisational and financial models for including non-formal sector qualifications in National Qualifications Frameworks – NQF-in*. It may be downloaded from the NQF-in Project website at www.nqf-in.eu.

Free copy

Table of Contents

Introduction	4
1. Defining the concepts and terms relating to models of including non-formal sector qualifications in NQFs	6
2. Different types of qualifications frameworks reported in the literature	13
3. Proposed typology of qualifications that may be included in NQF-based qualifications systems – prepared within the NQF-in Project	21
4. Characteristics of a qualifications system important in the context of including qualifications	27
5. Proposed models of including non-formal sector qualifications in NQFs	47
References	76
ANNEXES	80
Annex 1. Types of qualifications in the literature and EU documents/materials	80
Annex 2. Examples of qualifications awarded in different EU countries categorised according to the proposed typology	85

Introduction

The main aim of the NQF-in Project is to provide support to national governments, EU agencies and key stakeholders in developing policies for including qualifications in national qualifications frameworks, with a particular focus on qualifications awarded outside the formal education system (non-formal sector qualifications).

National Qualifications Frameworks (NQF) referenced to the European Qualifications Framework (EQF) are important policy instruments to promote mobility and lifelong learning at the national as well as the European level. The NQF can play a decisive role not only to improve the transparency of a national qualifications system, but also as a policy reform driver to increase the quality and accessibility of qualifications and, as a result, participation in lifelong learning (LLL).

The EQF Recommendation and other EU strategic documents on VET and LLL policies recommend that Member States implement overarching NQFs, because as it is argued, in order to be a policy reform driver, the NQF has to be open to the various types of qualifications awarded in different educational sectors, including those outside of the traditional, formal school-based system. All of the Member States declared their willingness to implement NQFs, and most have already presented referencing reports to the EQF Advisory Group. According to Cedefop (2015), the first stage of EQF implementation is reaching its final stage. However, in most EU countries that have implemented an NQF, only formal qualifications can be referenced to it, while very few countries have introduced systemic solutions for the inclusion of non-formal sector qualifications (e.g. France, Ireland, Scotland, Poland). Europe is just now beginning to face the stage of implementing solutions to include non-formal sector qualifications in NQFs. It is envisaged that in the coming years, the inclusion of non-formal sector qualifications will constitute one of the most important topics in discussions on NQF implementation at the EU and national levels. Central issues in these discussions will consist of model solutions, the quality assurance of this process and its financial aspects.

The analysis of the solutions for including qualifications also provides us with information about the characteristics of the qualifications framework and its place and actual role in the national qualifications system. The analysis of the inclusion of qualifications focuses on the types of qualifications that can be included in NQF-based qualifications systems, and which of them are explicitly excluded, as well as the solutions and procedures that have been introduced. Finally, by analysing the solutions and procedures of including qualifications, we can examine the actual significance of a given qualifications framework for the functioning of the system, and to what extent it is a non-functioning entity in practice, as noted by Allais (2017).

The NQF-in Project corresponds with policy learning and policy transfer initiatives advocated in the EU, which focus on the exchange of ideas, policies and policy instruments among different national qualifications systems. The main rationale for this project is the assumption that knowledge about policies in one national system may be used for the benefit of developing policies in another system (Dolowitz, Marsch 2000; Chakroun 2010).

Within the NQF-in Project, we collected the experiences of seven European countries that are at different stages of NQF implementation: Croatia, Czech Republic, France, Hungary, Ireland, Poland and Scotland. Each NQF-in Project partner prepared a country report that describes the systemic solutions used to include non-formal sector qualifications in the NQF. The reports and their annexes are available in a two-volume set from the project website at www.nqf-in.eu.

Based on the information in the country reports, joint discussions within the NQF-in partnership, analyses of solutions in other countries, literature review and deductive reasoning, we developed the organisational and financial models of including qualifications presented in this publication.

The authors of this report would like to express their gratitude to members of the NQF-in Project, in particular to: Anne Murphy, Matteo Sgarzi, Sheila Dunn, Jan Brůha, Ivana Carev, Mile Dželalija, Ellen Hazelkorn, Viola Horská, Miroslav Kadlec, Snježana Knezić, Zoltán Loboda, Alexandre Meliva, Anthony O'Reilly, Josiane Paddeu, Erzsébet Szlamka, Éva Tót, and Patrick Veneau as well as to Professor Christopher Winch and Maciej Lasota who provided external reviews.

1. Defining the concepts and terms relating to models of including non-formal sector qualifications in NQFs

1.1. Why we decided to use the model approach in the NQF-in Project

Within the NQF-in Project, we took the approach that developing models of including non-formal sector qualification will be a relevant and useful way to support stakeholders involved in designing policies on the inclusion of non-formal sector qualifications. This approach is in line with public policy theorists and practitioners working not only in the education field.

As indicated among others by Heemskerk, Wilson, Pavao-Zuckerman (2003), Exworthy (2008), Raffe (2009), conceptual models can be useful in policy design. Using models not only fosters understanding of the system being studied (Mayer 1989, Greca, Moreira, 2000), but also supports policy learning between countries. As indicated by Exworthy (2008):

Exporting policies within or between countries is often discounted on the basis that the 'context' is different and hence lessons from host countries cannot be learnt. However, a focus on conceptual models can obviate some of these problems by focusing on the key elements of the system that is being studied. By applying concepts related to the functioning of the system, it is thus possible to discern similarities and differences in patterns and practices across contexts.

Raffe (2009) indicates the importance of developing models in designing public policy, directly referring to national qualifications frameworks:

A model (...) may serve at least three purposes. First, it can encourage greater national self-awareness among policy analysts and policy-makers by helping them to see their own system in comparative context; it can 'make the familiar strange' (Broadfoot 2000, p. 357) by drawing attention to features of one's own system that would otherwise be taken for granted. Second, it can encourage reflection on how the purposes of NQFs, their design and the strategies for implementing them are connected. Third, the model can be used to compare the implementation and impact of NQFs and it can provide the starting point for an exploration of why some frameworks appear to be more successful than others.

Allais, Young, Raffe (2009) also supported the idea of developing general models and typologies of NQFs:

The idea of a typology of NQFs is important conceptually as it enables researchers to explore the links between a general model of NQF structure and development and the case of their particular country. The typology is also important because it enables policy-makers to move beyond what the American sociologist C. Wright Mills, described as 'personal troubles' ('why is my country having so many difficulties in implementing

its NQF?') and see such problems as 'public issues' that are common to all NQFs, and therefore explicable even if not immediately soluble.

Although it should be mentioned that recently Allais (2017b) expressed a critical opinion on using models. Allais warns that:

...when there are so few real examples in the world to consider, it seems as if developing a complex typology, complemented by a model of development and change, seems to be running the risk of being theory-heavy (...).

1.2. How do we understand the term “inclusion in the NQF”?

The term “inclusion of a qualification in the NQF” defines a certain relationship between the individual qualification and the national qualifications framework of a given country.

However, in various European countries, the relationship between the qualifications functioning in a qualifications system and the national qualifications framework is not shaped in quite the same way. Following this, for different countries, the phrase “inclusion of a qualification in the NQF” may mean, more or less, different formal procedures. In Scotland and Ireland, the terms “inclusion in the NQF” (Ireland) or “inclusion on the framework” (Scotland) are used. In Poland, the Act on the Integrated Qualifications System (IQS) of December 2015 established a system in which some groups of qualification were incorporated by statutory provision (by law), while other qualifications can be included in the system based on the decision of the minister with jurisdiction over a given qualification. The Act precisely defines the procedure of inclusion in the IQS, which has to be performed for any qualification awarded outside the formal education system (see the Polish country report). Pursuant to the IQS Act, including a qualification in the NQF in Poland means that it is included in the Integrated Qualifications System. France has a similar solution, wherein qualifications can be included in their system in two ways: inclusion by entitlement (by law) and inclusion by request. However, in France, this is not called “inclusion in the system”, but “inclusion in the qualifications register”. The same applies in the Czech Republic, where the term used is “including qualifications in the register”. In Hungary, the phrase “linking qualifications to the qualifications framework” is used.

In this project, we understand inclusion to be the solutions and procedures leading to the assignment of an NQF level to a qualification and its entry in a register. The term “inclusion of qualifications in the NQF” is important to us in relation to the national qualifications systems, in which qualifications are described by an assigned level and there is a publicly available register of qualifications. Qualifications systems in these countries can be called “NQF-based qualifications systems”. Thus, including qualifications in the NQF means the introduction of qualifications into a system based on the qualifications framework.

1.3. How do we understand the term “non-formal sector qualifications”?

There are different approaches and terms used across Europe to define qualifications awarded outside the traditional school system (general, VET, HE). In the application for the NQF-in Project, we decided to use the term “non-formal sector qualifications” (after Cedefop 2014) to indicate that we want to focus our analysis on the inclusion in the NQF of qualifications awarded outside traditional formal education systems, i.e. those awarded in the non-formal sector of the education system (for further information, see section 3.1. of this report).

It should also be indicated that there is a substantial difference between the concepts “non-formal sector qualifications” and “validation of non-formal and informal learning” (VNFIL) and they should not be confused. VNFIL refers to the process where an authorised body confirms that an individual has achieved learning outcomes in order to attain a qualification¹, whereas the term “non-formal sector qualifications” refers to the types of qualifications functioning outside the school education system. Non-formal sector qualifications can also be awarded through a VNFIL procedure.

1.4. How do we think about models in the NQF-in Project?

The term “model” has many different uses and meanings. As Turner et al. (2001) state:

Models can be formulated in many different ways. Physical models are material replicas of the object or system under study, but at a reduced size (...). In contrast, abstract models use symbols rather than physical devices to represent the system being studied. For example, verbal models are constructed out of words, graphical models are pictorial representations, and mathematical models use symbolic notation to define relationships describing the system of interest.

Similarly Hamarat, Kwakkel, Pruyt (2013) define a model as “a representation of the most crucial aspects of a system of interest for extracting usable information.” Conceptual or qualitative models are typically drawn as diagrams with boxes and arrows that show the main elements and flows of material, information, and causation that define a system (Heemskerk, Wilson, Pavao-Zuckerman 2003).

From the perspective of designing public policy, Collins Dictionary provides an especially useful definition of model: “a model of a system or process is a theoretical description that can help you understand how the system or process works, or how it might work” (Collins Dictionary, nd).

Following the Collins Dictionary definition, in the work of the NQF-in Project, we understand the **model of including qualifications in a qualifications system as a configuration of complementary legal, financial and organisational solutions.**

¹ The Council of the European Union, Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning (OJ C 398, 22.12.2012, pp. 1–5).

It should be noted that various models will have different consequences, significant from the point of view of national policy. The configuration of legal, financial and organisational solutions creates a multi-dimensional picture that takes into account several **characteristics of the qualifications system**.

The term characteristics of a qualifications system is used by us in the same sense as it is by Raffe (2003), Coles (2006) and Allais (2017b). In our work, the characteristics refer to several particular features/qualities of the qualifications system that influence the solutions used to include non-formal sector qualifications in NQF-based qualifications systems. The subject of the analyses in our work were the following characteristics of qualifications systems:

- types of qualifications that may be included in an NQF-based qualifications system, according to the typology of qualifications proposed by the NQF-in Project,
- ownership of a qualification included in an NQF-based qualifications system,
- allowable level of similarity of the qualifications included in an NQF-based qualifications system,
- character of the legal regulations on including qualifications in an NQF-based qualifications system,
- scope of the regulations on including qualifications in an NQF-based qualifications system,
- degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system,
- role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system,
- fees for including qualifications in an NQF-based qualifications system,
- the formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system.

For each of the characteristics listed above, two or more basic variants can be distinguished that could occur in particular NQF-based qualifications system. The selected characteristics along with their identified variants are presented in Table 1.

Table 1. Selected characteristics of a qualifications system and their basic variants

Characteristics of a qualifications system	Basic variants
Types of qualifications that may be included in an NQF-based qualifications system, according to the typology of qualifications proposed by the NQF-in Project	<ul style="list-style-type: none"> ■ All types of qualification may be included in the qualifications system ■ Only some types of qualifications may be included in the qualifications system
Ownership of a qualification in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ Qualifications included in the system remain the property of the submitting entity ■ Qualifications included in the system become a public good
Allowable level of similarity of the qualifications included in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system ■ Similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualification
Character of the legal regulations on including qualifications in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ Specific regulations on inclusion have the character of required legal norms ■ Specific regulations on inclusion do not have the character of required legal norms
Scope of the regulations on including qualifications in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ Specific regulations govern all significant elements in the process of including qualifications ■ Only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders
Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ One institution decides on including qualifications (as well as determines their level) ■ Many institutions can decide on including qualifications (as well as determine their level)
Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ The roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role ■ Social partners have a weak role in the process of including non-formal sector qualifications in NQF-based qualifications systems ■ Social partners play no role in the process of including qualifications

Fees for including qualifications in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ Fees are incurred when including a qualification in the system ■ No fees are incurred when including a qualification in the system
The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system	<ul style="list-style-type: none"> ■ Including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds) ■ Including qualifications in the system provides no practical formal or financial benefits for various stakeholder groups

For the needs of other analyses, it is also possible to distinguish additional characteristics of qualifications systems, such as the scope of the functioning of qualifications registers, the significance of occupational standards, or the role of credit systems (for more, see Coles 2006, Allais 2017). The way of distinguishing the characteristics should always be in line with the aims of a particular analysis.

1.5. How we created the models in the NQF-in Project

The models of including qualifications in NQF-based qualifications systems referred to in our report were created by appropriately combining selected variants identified for each of the presented characteristics.

It should be noted that it is theoretically possible to propose very many combinations of the variants included in Table 1. Some of the variant solutions for the individual characteristics may complement and “strengthen” each other. But, they can also be mutually exclusive or “conflict” to the extent that their combined use in the same system would in practice be very disadvantageous from the point of view of the system’s functioning.

An example of such conflicting options would be a system in which a qualification can only be awarded by its owner, while at the same time, similar qualifications would not be able to be included in the system. Such a system could quickly lead to a high level of monopolisation of qualifications. If the purpose of a national qualifications policy is to promote pluralism, then some of the solutions should not be used together in the country’s qualifications system.

An example of a pair of variants that complement each other and do not weaken coherence is a qualifications system, in which the inclusion of qualifications takes place according to uniform rules and procedures defined in a universally binding law, while at the same time, inclusion activities can be conducted by various entities.

The aim of our project is to show that the specific way of shaping the solutions used to include qualifications in an NQF-based qualifications system, particularly non-formal sector qualifications, has certain consequences that have to be taken

into account by policy makers. As a result of analysing the systems functioning in the seven countries participating in the project and discussions, four theoretical models for incorporating qualifications into NQF-based qualifications systems were proposed.

In proposing these theoretical models, the impact of a given variant or configuration of variants on the following properties of a qualifications system was adopted as the starting point:

- the coherence of the qualifications system (strengthens or weakens),
- incentives for stakeholders to include qualifications (encourages or discourages),
- proliferation in the qualifications system (monopolisation or de-concentration),
- absorption capacity of the national qualifications system (increases or decreases),
- dominance of resourceful institutions (strengthens or weakens)

Each of the proposed models described in section 5 of this report will be analysed in terms of the above-mentioned impacts.

2. Different types of qualifications frameworks reported in the literature

A review of the literature on the types of qualifications frameworks existing in the world offers a more in-depth understanding of the content of this report. The information contained in the literature provides important contexts enabling the solutions functioning in the countries participating in the project to be diagnosed and interpreted. Certain approaches and definitions were helpful in thinking about and developing the characteristics, solutions and models relating to the inclusion of qualifications in NQF-based qualifications systems.

A number of models or typologies of NQFs have been developed so far: Young (2003), Raffe (2005), Young (2005), Coles (2006), Tuck (2007), Allais (2007), Raffe (2009), Allais (2010), Allais (2016), see also Allais (2017b) for a useful synthesis.

Young (2003 and later 2005) proposed a number of types of qualifications frameworks:

(a) communication and regulatory frameworks

This distinction refers to the different goals or purposes that an NQF is designed to achieve rather than its strength (or its capacity to achieve these goals). All NQFs have a “communication” role, in the sense that they provide a map of qualifications; they give some indication of progression routes between levels and, at least in principle, across sectors. The “communication” potential of an NQF means that at a minimum it can assist both learners and those involved in career and training guidance in making choices. For this reason frameworks with this more limited role can be described as “enabling frameworks” to distinguish them from frameworks with a more overt regulatory role.

(b) weak and strong frameworks

This distinction refers to the “strength” or the capacity of a framework to achieve the goals set out by government (...). In strong frameworks strict requirements are laid down for including a qualification on the framework, whereas in weak frameworks the requirements are less demanding.

(c) partial and comprehensive frameworks

This distinction refers to the scope of an NQF and is a recognition that only in some countries does the NQF include all qualifications that are available. Scope may refer to:

- *qualification type – e.g. academic or vocational or those that are publicly or privately owned.*
- *qualification level – many NQFs exclude university qualifications, and there are countries like England which have specific frameworks limited to higher education qualifications;*

- *qualification sector – a framework could be specific to one occupational sector (for example, engineering), as in many cases in Latin American countries.”*

(d) unit-based and qualification-based frameworks

This distinction refers to whether in the qualifications frameworks units are registered as separate entities or whether qualifications frameworks allows only the whole qualifications to be included.

(e) institution-led as opposed to outcomes-led qualifications frameworks

This distinction refers to the process of implementation rather than to different framework structures. It is exemplified by the contrast between the sub-Saharan countries which are establishing NQFs on the lines adopted by South Africa, and the approach recently adopted by Singapore. Singapore has a high level of institutional provision for both general and vocational education, the NQF is being introduced to further coordinate this provision and to link it to the accreditation of work-based learning. The sub-Saharan countries, on the other hand, are attempting to introduce an NQF with relatively low levels of institutional provision. They presumably hope that an NQF will either act as a substitute for the lack of institutional provision by encouraging the accreditation of informal learning, or that it will act as a catalyst to motivate new provision, especially from the private sector.

Tuck, Hart, Keevy (2004) and later Tuck (2007) proposed to name *loose* versus *tight* frameworks instead of *weak* and *strong* as proposed by Young (2005). Tuck (2007) wrote:

...the terms tight and loose are preferred because of the possibly derogatory connotations of 'weak'. It is also connected to Boudier's distinction between frameworks as instruments of regulation and communication. Tight frameworks emphasise the regulatory or controlling function, while loose frameworks have a more communicative and enabling purpose...

Tight approaches are more appropriate where the aim is to regulate more closely or to achieve a consistent pattern of change. Loose approaches may be preferred where the aim is mainly to information about qualifications. Again, the approach should fit the purpose to be served by the NQF.

Table 2. Conceptual distinction between tight and loose frameworks, according to Tuck (2007)

<i>Tight qualifications frameworks</i>	<i>Loose qualifications frameworks</i>
Prescriptive about qualification design and quality assurance	Based on general principles
Regulatory purpose	Communicating and enabling role
Aim to achieve wider social goals	Regulate to some extent
Tend to apply common rules and procedures across all qualifications	Accept differences in approach where thought to be necessary

Raffe (2005) combines the concepts of tightness and scope of the framework to distinguish four types/models of NQFs, see Table 3 below:

Table 3. A typology of National Qualifications Frameworks, as proposed by Raffe (2005)

	Tightness:	Loose	Tight
Scope:			
Partial		A	B
Comprehensive		C	D

In commenting the typology presented above, Raffe (2005) noted that all frameworks experience a tension between two dimensions, i.e. scope and tightness:

Many integrated frameworks are designed as frameworks of type D and later they tend to move in direction either of B (by becoming less comprehensive) or C (by becoming looser) or a combination of both.

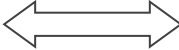
Raffe (2005) also introduced the concept of an integrated qualifications framework and explains the difference between comprehensive and integrated qualifications frameworks.

An integrated qualifications framework is more than just a comprehensive one. A comprehensive framework, as distinct from a partial framework, includes all types of learning: academic and vocational, formal and informal, education and training. Being comprehensive is a necessary condition of an integrated framework, but it is not a sufficient condition (p.21)

An integrated qualifications framework is one that recognises and celebrates a wide range of purposes, epistemologies, modes and contexts of learning, but which also recognises the need to build these into a coherent and coordinated system. In order to do this, it has to impose some aspects of uniformity. Some design rules have to be tight, in order to promote coherence; other design rules should be loose, in order to encourage diversity. The trick, of course, is deciding which should be tight and which should be loose. This is the tension, which Young (2005) has described, between the principle of difference and the principle of equivalence. To manage this tension effectively we need to be clear about the purposes of integration (p.22).

Coles (2006) proposed an extended list of dimensions that should be taken into consideration in the NQF architecture. In his paper Coles argues that it is possible to locate existing NQFs at a point on the continuum of each dimension, as shown in the table below.

Table 4. The design characteristics of NQFs as proposed by Coles (2006).

Main advantages	Design characteristic from.....to		Main advantages	
Coherence across qualifications Genuine national system	inclusive of all qualifications		partial coverage of qualifications	Implementation easier Piloting possible Staged development strategy
System wide reform possible Linkage with other national policies	designed and managed by central agency		organic development by stakeholders	Encourages harmonisation Stakeholder buy-in Allows regional development
Policy coordination Quality assurance	regulatory framework for assuring quality		classification of all qualifications	Communication with stakeholders
Powerful authority for framework Sanctions for non-compliance	legal basis		voluntary basis	Ownership secured Stakeholders work together
Builds on existing learning infrastructure	descriptors composed of learning inputs		descriptors composed of learning outputs	Independent of institutional structure Linkage with external frameworks
Relevance across all parts of education and training possible Linkage with external frameworks	level defined by descriptor		level defined by national reference qualifications	Builds on existing infrastructure Confidence in new framework higher
Close relationship to labour market Linkage better between education and work	qualifications based on competency standards		qualifications based on units of learning or achievement	Continues traditions of skills supply Builds on existing infrastructure

Coles points out that the national context influences the selection of the position on each dimension, with some choices being untenable and others being automatic:

For example, in federal states the buy-in from regions is essential and development of a legal basis through negotiation and consensus building can be a fundamental requirement. States where social partners have a strong role in qualification design, management and evaluation will be guided towards voluntary arrangements rather than centralist imposition.

Based on her studies of the South African NQF and insights from Young and Raffe (for more, see Allais 2017), Allais (2007) proposed to extend Young and Raffe's typology, as presented in the table below. In this typology, Allais proposed a set of primary characteristics of qualifications frameworks, which are likely to cluster together, and a set of secondary characteristics, which have no necessary relationship to any of the primary characteristics.

Table 5. Ideal types combining primary and implied characteristics, followed by secondary characteristics as proposed by Allais (2007).

Characteristics	Framework of communication	Outcomes-led framework
Purpose	Rationalization of qualifications	Reform, transformation or overhaul of the education system
Assumptions about knowledge	Knowledge as 'given'. (Some attempt to create transparency)	Implicit social constructionist; outcomes are primary
Role of institutions	Institutions lead the process of comparing qualifications, making judgements about programmes, and so on.	Outcomes are defined separately from institutions, which then design learning programmes against the outcomes.
Speed of development and approach of implementation	Incremental, bottom-up	Break with the past — fast, top-down
Definition of levels	Qualification defined	Level descriptors
Prescriptiveness	Loose	Tight

Raffe (2009) proposed a simplified version of the Allais (2007) typology and with some differences in the terms used and emphasis. Raffe distinguished three types of frameworks: (a) communications framework, (b) reforming framework; (c) transformational framework, described below:

- A communications framework takes the existing education and training system as its starting point and aims to make it more transparent and easier to understand, typically in order to rationalize it, to improve its coherence, to encourage access and to highlight opportunities for transfer and progression between programmes.
- A reforming framework takes the existing system as its starting point but aims to improve it in specific ways, for example, by enhancing quality, increasing consistency, filling gaps in provision or increasing accountability. It is typically statutory and has a regulatory role.
- A transformational framework takes a proposed future system as its starting point and defines the qualifications it would like to see in a transformed system, without explicit reference to existing provision. It typically uses learning outcomes for this purpose because they allow qualifications to be specified independently of existing standards, institutions and programmes.

Raffe states that the three types can be represented as a continuum, summarised in the table below.

Table 6. Typology of NQFs as proposed by Raffe (2011)

Type of NQF:	Communications	Reforming	Transformational
Starting point	Existing ET system	Existing ET system	Future ET system
Purpose:	To increase transparency; To provide tool for rationalising system, increasing coherence, facilitating access transfer and progression	To achieve specific reforms eg fill gaps, enhance quality, extend access transfer and progression; To provide tool for rationalising system, increasing coherence	To transform ET and lead development of new system
Design	Loose, varies across sub-frameworks; outcomes used as common reference point	Tighter, but varies across sub-frameworks; outcomes used as common reference point	Tight, central specification imposed more uniformly; outcomes used to drive change
Leadership and control	Voluntary 'Bottom up' ET institutions share leadership Substantial decision-making at level of sub-framework	Compulsory 'Top-down': led by central agency/govt ET institutions as key partners Control may vary across sub-frameworks	Compulsory 'Top down': led by central agency/govt ET institutions among partners Centralised control
Expected role in change	Tool for change: requires complementary drivers to ensure tool is used	Drives specific changes; requires complementary drivers for other impacts	Expected to drive transformation of system

Raffe argued that of the early comprehensive NQFs, those in Australia, France, Scotland and Wales are examples of communications frameworks; those in New

Zealand and South Africa started out as transformational frameworks; and that Ireland has an intermediate or reforming framework.

In the literature, we can find two further NQF models developed by Allais (2010 and 2016).

Allais (2010) distinguished three key objectives of qualifications frameworks, leading to three suggested types of frameworks. “Frameworks might be seen as predominantly one of the following:

... an attempt to make the relationships between existing qualifications more explicit,

... an attempt to make the relationships between occupational entry regulations and qualifications more explicit,

... an attempt to use independently specified outcomes or competency statements to drive a range of different educational reforms.”

In Allais (2016) the above typology was modified by the introduction of three types of frameworks:

- descriptive frameworks,
- occupational frameworks,
- ‘employer led’ outcomes based frameworks².

Concluding remarks from the analysis of the literature review from the perspective of designing models

As has already been mentioned, the information contained in the literature on this subject provides us with an important context in developing the model solutions. However, the models described in the literature are formulated on a very general level and do not refer explicitly to the process of including qualifications in NQF-based qualifications systems.

Raffe (2009) noted that most of the NQF models found in the literature were formulated in reference to Anglophone countries and the systems of organising a country according to Anglophone traditions. This is an important observation from the perspective of the NQF-in Project, as some possible solutions that could be relevant for continental European countries may not have been addressed in these models. Examples of such solutions could relate to the inclusion of qualifications in NQF-based systems that are under ministerial jurisdiction. In many European countries, ministries are responsible for developing qualifications and for regulating the process of their certification. Therefore, qualifications that are regulated by laws or ministerial regulations could constitute a significant part of national qualifications systems. At the same time, the solutions and procedures

² Allais places ‘employer-led’ in inverted commas to indicate that it is more of an aspiration than a practice reality.

developed for their inclusion may differ from private market qualifications and should be analysed separately. Another example relates to the issue of the ownership of qualifications. In the reviewed literature, it is tacitly assumed that the qualifications included in an NQF rest in the hands of their owners. However, in some countries, the ownership rights of qualifications included in the NQF-based system could be transferred to the public, as occurs, for example, in Poland, Hungary, the Czech Republic or Croatia.

The NQF models developed to date often treat the NQF as a homogenous entity, despite the fact that, as noted by Young (2007), written models of an NQF often mask substantial differences in the reality of frameworks even categorised to the same type. Raffe (2011) indicated that most comprehensive frameworks encompass distinct sub-frameworks, which may have different characteristics from the nature of a general model. Raffe (2009) gave the example of Scotland, where the NQF is described as loose and voluntary, but includes sub-frameworks that are rather tight and obligatory, such as the Scottish Vocational Qualifications and some sets of Scottish Qualifications Authority qualifications.

Finally, as we can see, the material presented in this chapter is not consistent. The terminology used to describe these or analogous elements varies. The functioning of qualifications frameworks is interpreted from different perspectives. Descriptions are formulated with a high level of generality and are more theoretical in nature. The above considerations do not indicate, for example, which types of qualifications can be included in qualifications systems, how the system should be financed, how issues of the ownership of qualifications, stakeholder engagement or the functioning of the qualifications register should be resolved.

Thus, we see how much there still is to be done to design solutions for the functioning of qualifications systems. Our report is an attempt to go one step further towards addressing specific, real problems that policymakers have to solve in developing a process of including qualifications awarded outside the formal education system in national qualifications systems.

3. Proposed typology of qualifications that may be included in NQF-based qualifications systems – prepared within the NQF-in Project

National Qualifications Frameworks (NQF) referenced to the European Qualifications Framework (EQF) are important policy instruments to promote mobility and lifelong learning at the national as well as the European level. In order to be a policy driver, national qualifications frameworks have to be comprehensive, i.e. open to different types of qualifications. European documents and reports indicate that not only school qualifications (general, VET, HE) should be referenced to the NQF, but also qualifications awarded outside the formal system of education. According to the joint report of UNESCO Institute of Lifelong Learning, ETF and Cedefop, 34 European countries are working towards comprehensive NQFs covering all types and levels of qualifications (UIL, ETF, Cedefop 2015, p. 10).

With respect to the implementation of comprehensive NQFs, the definition structure of types of qualifications awarded in qualifications systems has still not been developed in the literature and European policy documents³. As a result, various documents, reports and scientific papers name qualifications differently, rarely providing definitions of the terms they are using (see Annex 1). However, from the perspective of the NQF-in Project, it was of crucial importance to define the qualifications that are being awarded outside the formal education sector, i.e. non-formal sector qualifications.

In the literature, Young (2005) proposed a distinction between academic versus vocational qualifications or qualifications that are publicly or privately owned. In the policy papers and reports produced by such international agencies as Cedefop, ETF, ILO or UNESCO, the most frequently used terms regarding types of qualifications are “formal qualifications” and “non-formal qualifications”. “Formal qualifications” are usually treated as those qualifications awarded within the formal school system, whereas “non-formal qualifications” are those awarded by private training providers. Sometimes, instead of the term “non-formal qualification”, the terms “private qualifications” or “non-governmental qualifications” are used, but definitions are not provided.

The term “formal qualification” is vague, as it does not indicate explicitly whether it is referring to a qualification awarded only within the formal school system (general, VET, HE) or whether this definition includes qualifications awarded by public institutions that are not educational institutions. Also, different authors take different approaches in this matter. The term “formal qualification” may also signal that it refers to qualifications that are included in the NQF, as opposed to non-formal qualifications that are not included in the framework.

³ In Europe and the scientific communities, a thorough discussion has been conducted about the different types of learning, and a common understanding of terms has been established, reflected, among others, in Eurostat and Cedefop definitions (Eurostat 2006, Cedefop 2014, see also Werquin 2007).

Using the term “formal qualification” is also problematic from another perspective. The phrase “formal qualification” is tautological. If the qualification is the “formal outcome of an assessment and validation process which is obtained when a competent body determines that an individual has achieved learning outcomes to given standards” (EQF Recommendation 2008), then a qualification is formal by definition, and therefore it cannot be “non-formal”.

Below we present a synopsis of different approaches to defining “formal” and “non-formal” qualifications in different documents and reports.

Table 7. Different approaches to defining “formal” and “non-formal” qualifications

	Awarded within the formal education system (general, VET, HE)	Awarded by public institutions (outside the formal education sector) or bodies accredited by these institutions	Awarded by industries, sectoral organisations, crafts chambers	Awarded by private training institutions (including international organisations)	Included in the NQF
Formal qualifications (also called state/ government qualifications)	Yes	Yes or No	Yes or No	No	Yes or No
Non-formal qualifications (also called private market qualifications)	Yes or No	Yes or No	Yes or No	No	Yes or No

As indicated in Table 7, the terms “formal qualification” and “non-formal qualification” can overlap and may include different types of qualifications. Based on the discussions within the NQF-in Project and analysis of national solutions in different countries, we proposed that **the main criterion to distinguish different types of qualifications is the legal basis of the functioning of the qualification in the national qualifications system.**

If the process of awarding a qualification is regulated by legal acts, then this qualification will fall into the category of state regulated qualifications. Qualifications whose awarding process is not regulated by legal acts would be classified as non-regulated qualifications.

The education sector has traditionally well-established and well-recognised qualifications, awarding bodies, as well as institutions and procedures for quality assurance. This sector provides the foundation for NQF implementation. Therefore,

we propose to divide state regulated qualifications into two categories: state regulated qualifications awarded in the education system and state regulated qualifications awarded outside the education system. Another argument for this differentiation is that there might be different procedures of inclusion for these two types of qualifications in the NQF. In some national qualifications systems, state regulated qualifications awarded outside education systems may not even be included at all.

In this proposed classification, the type of awarding body (e.g. school, university, chamber of crafts, ministry) is not taken into account. It may occur that a university or chamber of crafts awards two or three types of qualifications (see Table 8).

It should also be emphasised that the proposal presented in Table 8 is not intended to compete with the terminology used within national qualifications systems, but to serve as a point of reference for discussion at the European level when comparing solutions adopted in different countries.

Table 8. Proposed generic types of qualifications

<p>Type A:</p> <p>State regulated qualifications awarded in the education system</p>	<p>Qualifications awarded in the formal, state supervised education system either by public or private providers.</p> <p>The key characteristic of this type of qualification is that the process of awarding qualifications is governed by national education laws and regulations.</p> <p>For example, the <i>matura</i> certificate or Master's degree would fall into this category because the awarding process of these qualifications is governed by educational legal acts. But if, for example, higher education institutions award other certificates that are not regulated by the legal acts governing higher education, these qualifications would fall under the category of non-state regulated qualifications.</p> <p>Formal education qualifications are usually included in the NQF by law automatically at the moment of their creation. In order to be included in the NQF, neither submission forms nor fees are required of this type of qualification. The process of quality assurance is well organised and defined by laws/regulations.</p> <p>This type of qualification could be named a "formal education qualification"⁴. Occasionally, it may be beneficial to distinguish subtypes of type A qualifications by education sector:</p> <ul style="list-style-type: none"> – state regulated qualifications awarded in the general education sector, – state regulated qualifications awarded in the vocational education and training (VET) sector, – state regulated qualifications awarded in the higher education sector (HE).
--	---

⁴ The term "formal education qualification" is not tautological and it clearly indicates that this category includes only qualifications that are awarded within the formal education system.

<p>Type B:</p> <p>State regulated qualifications awarded outside the education system</p>	<p>Qualifications that are regulated by legal acts or directly by ministries or government agencies but are not qualifications awarded in the formal education (school) system.</p> <p>In different countries, different qualifications would fall into this category. In Poland, examples of qualifications in this category would be: class one/two/three diver, tax advisor, nuclear regulatory inspector, tourist guide or mushroom classifier – since the process of awarding these qualifications in Poland is governed by legal acts.</p> <p>If the process of awarding a particular qualification is governed by legal acts, then the awarding body usually cannot submit its qualification to the NQF itself – it may have to seek a ministerial decision or, in some cases, even parliamentary approval.</p> <p>Very often, changes to learning outcomes, quality assurance procedures and other elements of state regulated qualifications have to be approved by political decision makers.</p> <p>It should be noted that the concept of a state regulated qualification is not the same as the concept of a regulated profession (according to EU Directive 2005/36/C).</p>
<p>Type C:</p> <p>Non-state regulated qualifications</p>	<p>Qualifications whose awarding process is not regulated by legal acts. These qualifications are usually awarded according to the principle of “the freedom of economic activities”. With respect to non-state regulated qualifications, an awarding body usually decides to submit a qualification for inclusion in the NQF and if any changes are required (modification of learning outcomes, assessment procedures or changes in quality assurance procedures) before it can be included, the particular awarding body has the authority to make the changes. In some reports and EU documents this type of qualification is called a “private (market) qualification”. However, this category of qualifications could distinguish not only private/market qualifications, but also qualifications awarded by non-profit organisations: community groups, voluntary organisations, trade unions, qualifications regulated by branches/sectors, i.e. qualifications awarded by a chamber of commerce or other sectoral organisations (if they are not regulated by legal acts).</p>

Types B and C could both be treated as non-formal sector qualifications, though type B is rarely described in the literature or in inventories of practice (Cedefop, ETF, UNESCO 2015, p 10).

NQF-in partners were asked to classify qualifications in their countries according to the proposed typology in Table 8. This task turned out to be feasible and gave us confidence regarding the usefulness of this typology. This typology also helped to clarify that different types of qualifications might follow different procedures of inclusion and have a different status within NQF-based qualifications systems. In Table 9, we provide examples of different types of qualifications within the NQF-in partner countries, whereas in Annex 2, we present the full tables filled in by representatives of the NQF-in partner countries.

Table 9. Examples of different types of qualification in the NQF-in Project partner countries

	Type A qualifications	Type B qualifications	Type C qualifications
Croatia	<p>Certificate of completion of eighth grade (compulsory primary school)</p> <p>Certificate of completion of two-year VET programmes</p> <p>Certificate of completion of the State <i>Matura</i></p> <p>Certificate of <i>Stručni Pristupnik</i> (short-cycle)</p>	<p>Certificate of driving instructor</p> <p>Certificate of professional vehicle driver for the transport of dangerous goods</p> <p>Certificate of tourist guide</p>	<p>Certificate of breastfeeding advisor for midwives</p> <p>Certificate of make-up artist</p> <p>Certificate of hiking guide practitioner</p>
Czech Republic	<p>Graduation <i>maturita</i> certificate (<i>maturitní vysvědčení</i>)</p> <p>Diploma certifying the Bachelor's degree (title of <i>bakalář</i> – Bc., <i>bakalář umění</i> – BcA.; both titles are used in front of the name)</p>	<p>Real Estate Agent (<i>Obchodník s realitami</i>)</p> <p>Tax Adviser (<i>Daňový poradce</i>)</p>	<p>Autodesk – AutoCAD 2012 Certified Associate</p> <p>ECDL Advanced Certificate</p>
France	<p>CAP (certificate of professional competence)</p> <p>Vocational baccalauréat</p> <p>DUT (University technological diploma)</p>	<p>Homecare and educational assistant state diploma (DEAES)</p> <p>Deck watch deputy officer</p> <p>Universal catering agent</p>	<p>Building and public works supervisor</p> <p>Manager of a social unit and service provider for elderly dependents</p> <p>Heavy equipment operator used in construction and rural engineering</p>
Hungary	<p>Certificate of secondary school leaving examination (<i>Maturity</i>)</p> <p>NVQR Vocational qualification</p> <p>Higher education diploma (Master degree + higher education qualification, MA, MSc)</p>	<p>Other vocational training certificates⁵</p> <p>Master craftsman title</p> <p>Qualification of authority regulated training and specialised professional trainings⁶</p>	<p>Certificates after completion of competence development training programmes</p>

⁵ „Other vocational trainings” are those registered by the Hungarian Chamber of Commerce and Industry (HCCI), whose vocational programme requirements (VPRs) must be accepted in a special procedure.

⁶ Regulated sectoral qualifications refer to certain jobs in legal and medical professional positions requiring specialised additional professional training.

	Type A qualifications	Type B qualifications	Type C qualifications
Ireland	Leaving Certificate Applied (for completion of secondary school) Bachelor Degree Master's Degree	Tax consultant Building Energy Regulator Gas Installer Approved Driving Instructor	Air Traffic Controller Pesticide Advisor
Poland	<i>Matura</i> certificate Vocational diploma Diploma certifying the title of <i>magister</i>	Diver – class one/two/three Tax advisor Nuclear regulatory inspector	Certificate of Risk Management of the Warsaw Institute of Banking Real estate management Providing group fitness classes
Scotland	National Awards 1 – 5 Higher and Advanced Higher Awards Higher National Diploma	Dangerous Goods Safety Adviser Oil and Gas Sector Survival Course Scottish Certificate for Personal Licence Holders	Introduction to Actor Training Diploma in Deafblind Studies Strategic Community Safety Walking Tour Guiding

4. Characteristics of a qualifications system important in the context of including qualifications

As already mentioned in Chapter 1, nine key characteristics were identified in the NQF-in Project relating to the process of including qualifications in an NQF:

- types of qualifications that may be included in an NQF-based qualifications system, according to the proposed typology of qualifications in the NQF-in Project,
- ownership of a qualification included in an NQF-based qualifications system,
- allowable level of similarity of the qualifications included in an NQF-based qualifications system,
- character of the legal regulations on including qualifications in an NQF-based qualifications system,
- scope of the regulations on including qualifications in an NQF-based qualifications system,
- degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system,
- role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system,
- fees for including qualifications in an NQF-based qualifications system,
- the formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system.

We can distinguish two or more basic variants for each characteristic listed above that can be applied in a particular NQF-based qualifications system, as shown in Table 1 of section 1.2.

This chapter describes each of the nine characteristics together with their possible variants. In describing the variants, we strove to present examples of the relevant solutions used in NQF-in partner countries, which are more fully elaborated in the country reports prepared for the project⁷.

4.1. Types of qualifications that may be included in the NQF-based qualifications system

In applying the typology of qualifications (type A, B, C) developed within the NQF-in Project (see Chapter 3), we can distinguish several variants regarding the types of qualifications that can be included in an NQF-based qualifications system – from a variant including all types of qualifications in the NQF to a variant including only one type of qualification.

⁷ More information is available at the project's website: <http://www.nqf-in.eu>.

Table 10. Variants regarding the types of qualifications that may be included in an NQF-based qualifications system

Variants of solutions	Types of qualifications that may be included in a qualifications system		
	Type A State regulated qualifications awarded in the education system	Type B State regulated qualifications awarded outside the education system	Type C Non-state regulated qualifications
Variant 1	X	X	X
Variant 2	X	X	
Variant 3	X		X
Variant 4		X	X
Variant 5	X		
Variant 6		X	
Variant 7			X

It is important to note that if National Qualifications Frameworks (NQF) referenced to the European Qualifications Framework (EQF) are meant to promote mobility and lifelong learning, they have to be open to the various types of qualifications awarded in different educational sectors (type A, B, C qualifications), i.e. to be comprehensive qualifications frameworks.

Including non-formal sector qualifications in NQF-based qualifications frameworks, especially for type C qualifications, is usually organised as an application process, submitted by an awarding body. This means that inclusion is not automatic and legally-based, as is the case for type A and some type B qualifications, see Box 1.

Box 1. Inclusion by entitlement and inclusion by request

Inclusion by entitlement means that a qualification is included in the NQF-based system by law – “automatically” – at the moment of its creation. This is usually the case with type A qualifications, but could also relate to type B qualifications, as for example in France. The design of formal education qualifications (e.g. NQF level, volume, target groups) is usually determined by educational laws and/or other regulations.

Inclusion by request refers to a situation in which a body or institution submits a qualification for inclusion to an authorised body.

Among the NQF-in Project countries, the Scottish framework mostly consists of type A and type C qualifications. Therefore, its solutions are closest to variant 3, although as indicated in Annex 2, some type B qualifications may be included in these frameworks

France and Poland could be classified to variant 1, as three types of qualifications (type A, B, C) may be included in the NQF in these two countries. France is an interesting case, as different types of qualifications go through different procedures of inclusion (see the French country report for further information). In Poland, apart from type A qualifications, type B qualifications are considered to be very important for the functioning of the whole system and the legislation requires that type B qualifications be reviewed – each minister must conduct a review of the qualifications that are within his/her jurisdiction within a five-year period after passage of the NQF legal act in order to decide which qualifications should be included in the system.

The Croatian framework could also be classified to variant 1, as it is envisaged that this framework will also be open to all three types of qualifications. However, these solutions have not been implemented yet in Croatia.

Hungary's NQF includes all school/college qualifications – type A qualifications, and some type B qualifications. Therefore, Hungary would fall into the variant 2 category. However, as indicated in the Hungarian country report, there are plans to develop procedures to include other type B and type C qualifications.

Currently, it could be argued that only type A qualifications are included in the NQF in Ireland, thus variant 5 might best apply.

It should be noted that according to the Global Inventory of Regional and National Qualifications Frameworks (Cedefop, ETF, UNESCO, UIL 2017), variant 5, in which only type A qualification can be included in the NQF-based qualifications system, is the dominant model across the countries implementing NQFs.

4.2. Ownership of qualifications in the qualifications system

The issue the ownership of a qualification included in an NQF-based system refers to answering the question of whether such a qualification is owned by the institution submitting it for inclusion or does it become a public good. In the context of the NQF-in Project, the crucial aspect of ownership is whether a qualification included in an NQF-based system is “available” to other awarding bodies. In other words, can other institutions apply to be awarding bodies for a qualification that is listed in an NQF register? How this issue is addressed in a national qualifications system will determine to a very significant extent the logic of the whole system, as well as the incentives and disincentives to include qualifications. The issue of ownership in the context of this project relates mostly to type C qualifications – i.e. qualifications that are not regulated by the state.

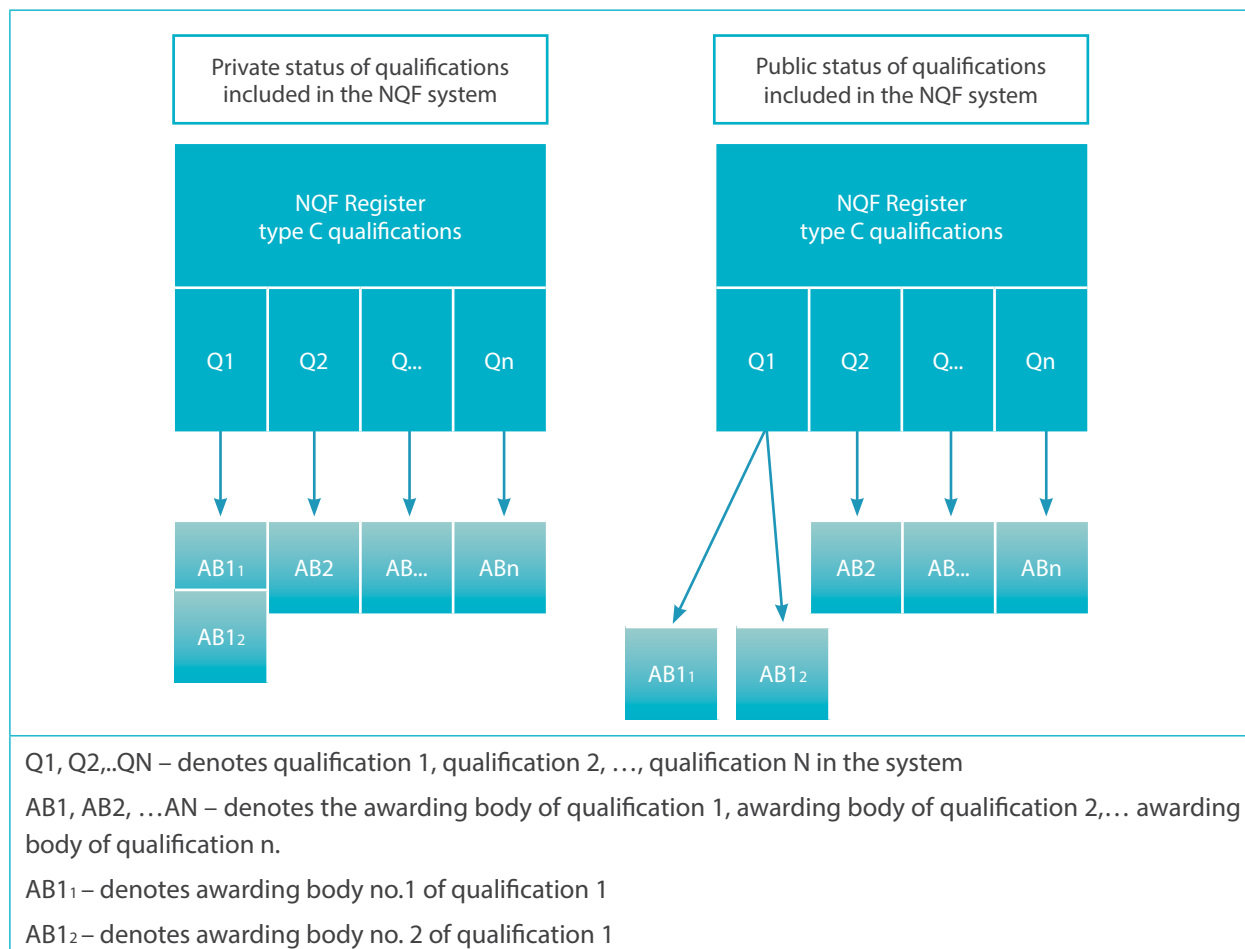
With regards to the ownership of a qualification included in an NQF-based system, two variants can be distinguished:

- A qualification included in an NQF-based qualifications system is a private good (private status of a qualification included in NQF)
- A qualification included in an NQF-based qualifications system becomes a public good (public status of a qualification included in NQF)

In the private variant, an awarding body which submits a qualification for inclusion in the system is the owner of the qualification. No other institution can award the qualification without the consent of this awarding body. However, the awarding body could enter into an agreement with another awarding body that wants to award its qualification, and therefore there could be more than one awarding body for one qualification as depicted on the left side of Figure 1.

In the public variant, qualifications in an NQF-based qualifications system are in the public domain, meaning that another awarding body, not related to the awarding body that submitted the qualification, can become an awarding body for this qualification after fulfilling the required criteria.

Figure 1. Ownership of qualifications – private and public status of qualifications included in NQF-based qualifications systems



The main rationale for implementing the public variant may be the protection of the NQF system against either monopolisation by a limited number of awarding bodies or fragmentation of the system. The main argument against implementing a public model is that some institutions may not be willing to share their know-how and ideas with other institutions and the public. Therefore, it is assumed that the public variant may have disincentives for some awarding bodies. Keating (2008), for example, argues that taking away ownership from institutions to governments may have a strong negative impact on trust in the system:

The governance of qualifications continues to and needs to reside with their owner institutions and user communities. The alternative to these arrangements is to locate their ownership and management in a central agency. The consequences of this approach are likely to be the weakening of the 'communities of trust' (Young, 2007) upon which qualifications depend for their currency.

Scotland, France, and Ireland (except for the CAS system) are countries in which the private variant has been implemented, whereas Poland, Hungary, Czech Republic and Croatia are representatives of countries with the public variant.

To illustrate the distinction between private and public within the NQF-in Project, we prepared a mini case, which each NQF-in Project partner was asked to address:

Qualification X was included in the NQF upon the request of a branch/sectoral organisation operating in region Y. After a year, another branch/sectoral institution would like to become an awarding body for qualification X. Is it possible for this institution to become an awarding body? If yes, under which conditions? Who makes the relevant decisions?

Below we present the relevant fragment of the texts of the NQF-in country reports on the issue of ownership:

Scotland:

The decision as to whether institution B is allowed to become an awarding body for qualification X remains entirely in the remit of organisation A. If organisation A decides that institution B can award qualification X they must have the necessary quality assurance in place to monitor this and institution B would normally have to go through an approval process before being allowed to award the qualification (...)

Ownership of non-formal qualifications on the framework remains with the original owner of the qualification or learning programme. The qualification or learning programme does not become a "public" qualification and the owner of the programme has no obligation to allow other organisations to deliver the qualifications or programmes. Those that do are required to have the necessary quality assurance in place to monitor this delivery. However these quality assurance systems will differ from sector to sector and organisation to organisation.

Ireland:

Qualifications/awards on the Irish NQF are not “free” for use by any provider other than those qualifications/awards listed in the Common Awards System (CAS) at level 1 to 6. In any case, providers must be quality assured as providers and have achieved approval for each qualifications/award programme through the validation process and have paid the appropriate fees for these services. All approved qualifications/awards on the NQF are coded in relation to the provider which developed them. These codes are generally used for applications and monitoring purposes. So, it is not possible for a different provider to “snatch” a qualification developed by another provider and to replicate it for themselves, beyond the specifications standards published by QQI in the CAS data-base. Provision of major state-funded qualifications/awards in the state at higher education level is monitored by the Higher Education Authority (HEA) in relation to supply and demand from learners and the labour market.

France:

In the French system, all qualifications (formal or informal) belong to the “organisations and bodies which created them” (Art L 335-6 of the Education Code). The qualification is, therefore, considered “an intangible asset” (Rapporteur from the CNCP). In other words, a qualification can remain “private”, even though it is included in the RNCP. This has far reaching consequences. If a training provider wishes to issue a qualification which is included in the RNCP, it must have the consent of the body which created it (and, therefore, owns the qualification). It can only issue the qualification in accordance with any restrictions imposed by the body. The body which owns the qualification may, if it so chooses, offer this organisation the chance to enter into agreements or other contracts with it. *From the moment it enters into an agreement, it must ensure that whatever is done by the provider, whatever is done in the organisation it has entered into an agreement with, fully complies with its own terms and conditions, and must provide the means to monitor this.* (Rapporteur from the CNCP) When it receives an application for inclusion, the CNCP scrutinises any agreements which have been set up and entered into by a central body which owns the qualification in question and any other bodies which issue it. To enable it to do this, it asks the applicant for detailed information on the organisations which issue the qualification and also the contractual relationships which exist between them and the body which owns the qualification.

Poland:

A specific feature of the Polish system is that in the case of market qualifications, an awarding body can be appointed for those qualifications already existing in the Integrated Qualifications Register. Once a market qualification is entered in the Register, it becomes a public good. The institutions applying to have the qualification entered in the Register cannot reserve the exclusive right to award it. Any institution interested in awarding a qualification that already exists in the Register and is awarded by other entities may apply for the authority to award it and be included in the list of awarding bodies. This solution is designed to protect the market of the Polish qualifications system from becoming excessively monopolised.

Let's use a hypothetical example: the Warsaw confectioners association introduces a qualification in the Integrated Qualifications System (IQS) called "making jelly doughnuts". The qualification is entered in the Register and the Warsaw confectioners association receives the status of awarding body. A year later, the Kraków confectioners association wants to find out if it too can offer the "making jelly doughnuts" qualification that is in the IQS. The answer is yes. Under the IQS Act, the Kraków confectioners association can apply to the relevant minister to become an awarding body for the qualification of "making jelly doughnuts". The minister makes the decision, and in doing so, does not need to obtain the consent of the Warsaw confectioners association, which originally applied to have this qualification entered in the IQS. The Kraków confectioners association can achieve the status of awarding body as long as it meets the requirements specified in the IQS Act.

Hungary:

Non-formal training vocational programme requirements (VPRs) are submitted by training providers (companies) to the Chamber for approval. The programmes elaborated by them after their acceptance (already without the indication of the submitting organisation, company) are published on the public web site of HCCI and so the companies lose their owner status for the concerned programme, i.e. the VPRs become "publicly owned", and other companies have to start their training programmes under the same name according to them. This means the descriptions become texts that can be known and used by anyone the same way as the vocational examination requirements of state recognised qualifications.

4.3. Similarity of qualifications included in the NQF system

The issue of the similarity of qualifications refers to answering the question of whether the NQF-based qualifications system allows similar qualifications to be included or not.

Two basic variants may be distinguished with regards to the similarity of qualifications:

- Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system
- Similarity does not preclude the ability to include the new qualifications

The rationale for not allowing the inclusion of similar qualifications in a qualifications system is to protect the qualifications system from becoming too fragmented – proliferated, see Box 2 below. An argument is that it may be difficult for learners and employers to navigate the qualifications system if there are many qualifications with a similar content in the NQF system. However, introducing solutions prohibiting the inclusion of qualifications in the NQF system because they are similar to already included qualifications may have significant consequences for the functioning of the system. These issues are discussed below.

Box 2. Proliferation in the qualifications system – the cases of France and New Zealand

The proliferation of qualifications in the NQF-based system is a very important topic addressed in the French NQF-in country report, which states:

(...) the legislation and regulations relating to the course content of qualifications and the procedure for issuing them encourage overlaps between qualifications, and this undermines the register's objective of providing clarity.

A number of initiatives have been launched to address the problem: the creation of information sheets in the register for courses forming part of bachelor's and master's degrees, proposals to set up bridges between qualifications, measures to encourage joint qualifications or the setting up of networks of certification bodies (section 3). However, more is still needed (...)

A greater professional trade participation in the process of designing qualifications could allow a best governance and might also reduce overlap between qualifications. Some of the major employers' associations support this idea. This involvement would draw on the expertise and resources of sectoral observatories.

(...) the CNCP regularly encourages the creation of bridges between "neighbouring" qualifications. It also encourages applicants to get in touch with certification bodies which have already had their qualifications listed in the register.

The proliferation of qualifications has also been the subject of debate in New Zealand:

The NZQA has also announced wider changes to the NQF, following a targeted review of qualifications offered at certificate and diploma levels, which was undertaken in 2009-2010. The changes were deemed necessary because, amongst other things, a proliferation of qualifications (many of which were substantially the same) at levels 1–6 had made it difficult for learners to select courses and for employers to assess the quality of qualifications and tell if potential employees had the skills and knowledge they need... (Strathdee, 2013, p. 112).

When designing solutions regarding the similarity of qualifications, it might be worth considering whether they should pertain to all types of qualifications or to only some types of qualifications.

Usually, when type A qualifications are being included in a qualifications system, the issue of similarity is not taken into account (especially with regards to qualifications awarded in the higher education system). However, when a type C qualification is being included, the question then arises about whether it should be compared to all types of qualifications in the system or only to type A or type C qualifications. This issue was raised in Poland, and several members of the IQS Stakeholders Council recommended that when including type C qualifications in the system, they should not be compared with type A qualifications. In other words, even if a particular type C qualification submitted for inclusion has similar learning outcomes as a type A qualification, it should not be rejected from the qualifications system, as type A and type C qualifications have different characteristics.

If the inclusion of similar qualifications in the system is explicitly prohibited, then the criteria of similarity may need to be defined, i.e. what will be the criteria for determining that two or more qualifications are similar – the title of the qualification, learning outcomes, training materials – see the case of Hungary described in Box 3.

Box 3. The issue of the similarity of qualifications – the case of Hungary

The NQF in Hungary includes all formal education qualifications (school based, type A) and certain type B qualifications (regulated and can be attained through out-of-school adult training) that come under the Adult Training Act.

The issue of similarity may arise in the following scenarios:

1. A training provider submits a type B vocational programme requirement for assessment, and the dedicated vocational programme committee concludes that the name of the submitted type B qualification corresponds (or is akin) to either a type A qualification (such as a National Vocational Qualifications Register – NVQR qualification, a higher education qualification, an authority regulated qualification) or another already registered type B qualification. In any of these cases, the vocational programme requirement is rejected on the basis of a ministerial regulation⁸.
2. The majority of the learning outcomes (75%) in the submitted type B vocational programme requirement corresponds to a type A, NVQR qualification's examination requirements. In this case the registration of the submitted type B vocational programme requirement has to be rejected due to the modification of the ministerial regulation mentioned above⁹. There is, however, an exemption. If the vocational programme requirements of the proposed type B qualification aims at the acquisition of higher special skills in addition to the professional competences already specified in the description of a particular NVQR vocational examination requirement, registration may be granted.

In summary, the issue of similarity occurs due to the specific Hungarian context, only when the title or the learning outcomes of a type B vocational programme requirement is submitted and has a significant overlap with an already existing, registered type A qualification's examination requirements. Resolving the issue of similarity is the responsibility of the programme committee and is additionally addressed by ministerial regulations.

The similarity of qualifications linked with the issue of the ownership of qualifications in an NQF-based qualifications system

The issue of similarity very much relates to the issue of the ownership of a qualification.

If a qualification has the status of private property in the NQF system (see section 3.2) and at the same time, similar qualifications can be included, then the qualifications in the system may have a tendency to **proliferate (be fragmented)**. This results from the fact that the only way for new awarding bodies to enter the qualifications system is to have them create new qualifications – awarding bodies cannot apply to award qualifications that have already been submitted. However, if

⁸ No. 59/2013. (XII. 13.) Regulation of the Ministry of National Economy on the registration and procedures of adult training vocational programme requirements and certification of the acquisition of other professional qualifications.

⁹ No. 13/2017 (VI.29) Regulation of the Ministry of National Economy on the registration of adult training vocational program requirements and on the modification of No. 59/2013. (XII. 13.) Regulation of the Ministry of National Economy on the certification other professional qualifications.

similar qualifications are not allowed to be included, then the system will become **monopolised**. This results from the fact that the first entity submitting a particular qualification will automatically block other awarding bodies wanting to submit similar qualifications to the qualifications system.

The public variant, in which the qualification has the status of a public good, is free, at least in theory, of the threats mentioned above. However, as has already been signalled, the public status of a qualification may be a disincentive for institutions to submit their qualifications for inclusion to the system, as they will then have to waive their ownership rights.

If we consider the issues of similarity and ownership further, we can conclude that if barriers are intended to be imposed on the similarity of qualifications, then adopting a private ownership variant will not be feasible. This is because if similar qualifications cannot be included in the system and institutions cannot apply to be awarding bodies for already included qualifications, the system will then be monopolised to an extent that will not be acceptable in most countries (such a situation may even be in disagreement with national regulations on competition and consumer protection laws). This is due to the fact that if an awarding body's application is rejected because of the similarity of the submittal to other qualifications that are already functioning in the system, this institution is in fact excluded from the system. Therefore, in this case, the only solution would be to apply to be an awarding body for a qualification that is already in the system, hence the public variant.

4.4. Character of the legal regulations on including qualifications in an NQF-based qualifications system

Two basic variants can be distinguished for this characteristic:

- Specific regulations on inclusion have the character of required legal norms
- Specific regulations on inclusion do not have the character of required legal norms

Allais (2011) indicates that *formal legislation and regulations might be important tools to create, manage, and govern NQFs. The existence of legislation may also be seen to serve as a signal to key stakeholders of the value attached by government and its commitment to the NQF.*

Young (2005) discusses the significance of complementarity between the aims of implementing qualifications frameworks and the character of the regulations and their scope, providing the example of implementing the National Vocational Qualifications (NVQ) in England. According to Young (2005), implementing tight frameworks might be problematic if they are not supported by an adequate legal framework:

The extent to which an outcomes-based framework leads to a complete replacement of the old system depends on how prescriptive the criteria of the new framework are,

and whether the framework criteria are made a legal requirement by government. The case of the NVQ framework in the UK is arguably an example of the worst of both worlds. A highly prescriptive framework in terms of how qualifications and assessment requirements are defined and a government unwilling to legislate. The original assumption of the national vocational qualifications review (RVQ) that led to the new framework was that it would be an instrument for accrediting existing qualifications. However, in practice this proved to be impossible and either existing qualifications continued to be provided independently of the framework, or completely new qualifications were developed that complied with the framework criteria.

Raffe (2012) also points to the significance of the character of the regulations and their scope:

Many NQFs are regulatory, and some include regulatory sub-frameworks (typically for VET) within voluntary over-arching frameworks. In such cases the regulatory powers of the framework may be the most important lever of change: for example, the Irish framework has required all qualifications in its further education and training sub-framework to meet the specifications of a new Common Awards System, and required all qualifications to satisfy guidelines for quality assurance and for access, transfer and progression. These requirements have, at least so far, been more important change processes than (for example) the transparency of qualifications or cultural change (Collins et al. 2009). The same is true of several other frameworks; for example the high uptake of recognition of prior learning (RPL) procedures in France is partly due to the regulations which require and enforce these procedures, although it also reflects the availability of resources and a strong infrastructure for supporting the process.” (Dif, Heraud and Nkeng 2009; Coles, Oates and Leney 2011)

4.5. Scope of the regulations on including qualifications in an NQF-based qualifications system

This characteristic refers to what is called in the literature *tight* versus *loose* qualifications frameworks by Raffe (2005), Young (2007), and Tuck (2007). Tight frameworks have detailed regulations governing all important elements of the qualifications inclusion process, such as, among others, the manner of describing qualifications, assigning levels to qualifications, and the quality assurance of qualifications. The regulations pertain to all the actors. Loose frameworks contain only general guidelines that allow a wide margin of discretion for specific stakeholders and the requirements are less demanding.

With regards to type B and type C qualifications, the Irish, French and Polish NQFs could be classified as tight frameworks, whereas the Scottish is more reflective of a loose framework.

4.6. Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system

For this characteristic, two basic variants can be distinguished:

- One institution decides on including qualifications
- Many institutions can decide on including qualifications

The nature of the regulations on including qualifications in NQF-based qualifications systems (section 4.4), their scope (section 4.5) and the degree of centralisation are very important for achieving the objectives of an NQF-based qualifications system and in particular for the coherence of the system.

One institution (this can be a new institution or one that has been given new powers) equipped with the appropriate legal authority (prerogatives) may be able to impose the use of similar approaches in the qualifications inclusion process (including the manner of describing qualifications, determining the level of qualifications, and ensuring the quality of qualifications), taking into account the specificity of individual education sub-sectors. Therefore, creating one central institution may contribute significantly to the coherence of the system.

However, it should be noted that if it is not adequately equipped (financially and organisationally), it may bottleneck the system. A central institution with limited resources may not be able to absorb a large number of qualifications in a given period of time. On the other hand, setting up a large institution when the system is just beginning to function may require substantial financial resources from the state, as the fixed costs of one institution may not be covered by fees from submitting bodies (the model in which there are many existing institutions additionally tasked with making decisions about including non-formal sector qualification may alleviate this problem).

International experience also indicates that transferring responsibility for the process of including qualifications awarded by various education sub-sectors (formal, VET, HE, non-formal education) to one institution in an existing institutional and legal order can be difficult and lead to conflicts of competence between the new institution and existing ones (see Allais 2011). There may also be other reasons for not centralising decisions on including qualifications in an NQF-based qualifications system – financial considerations, institutional conditions, legal traditions and others.

In Ireland and France, one central institution is responsible for accepting applications, analysing them, and making the decision on whether to include a submitted qualification in the NQF or not. In Ireland, Quality and Qualifications Ireland (QQI) is a state agency responsible for including qualifications in the NQF-based system. Similarly, the Commission Nationale de la Certification Professionnelle (CNCP), a central institution, operates in France.

CNCP analyses requests for including qualifications in the French register of qualifications and makes recommendations to the relevant ministry, which then

makes the final decision. It should be noted, however, that French solutions envisage situations in which providers operating at the regional level submit the request for inclusion to regional institutions, which conduct the initial assessment. Even if the request was submitted regionally, the procedure moves to CNCP, which submits the formal recommendation to the ministry.

In Scotland and Poland, several institutions are indicated that are able to decide on the inclusion of qualifications in the system. In Scotland, these are called “credit rating bodies”, and include, for example, the Scottish Qualifications Authority, Institute of Chartered Accountants in Scotland, City&Guilds, colleges, and universities. Submitting bodies in Scotland can approach different credit rating bodies that will assess their application in a process called “third party credit rating”. Providers there can select a credit rating body based on their preferences. The credit rating body assesses the submitted application and if the decision is positive, relevant information is sent to the Scottish Credit and Qualifications Framework Partnership (SCQFP), which manages the Scottish Register and is responsible for coordinating the functioning of the NQF in Scotland. It is important to stress that not all credit rating in Scotland is third party credit rating, as there are a number of institutions there that can credit rate their own qualifications.

In Poland, submitting bodies approach an intermediary institution, which delegates submission requests to different institutions – the ministries responsible for analysing the applications based on their area of expertise. All requests in Poland to include market qualifications (type C) are submitted to the institution operating the NQF register. Originally, this body was the Polish Enterprise Development Agency (PARP), but as of 2018, it is the Educational Research Institute (IBE). IBE assesses the formal aspects of the application and then electronically transmits a completed application to the relevant ministry. The relevant ministry reviews the submitted application and determines whether to include the qualification or not. It should be noted, however, that the functioning of the qualifications system is coordinated by the Minister Coordinator of the IQS with the support of the IQS Stakeholders Council.

The degree of centralisation of the quality assurance of non-formal sector qualifications

There are a diverse number of institutional arrangements among the NQF-in Project countries with different institutions involved in the quality assurance of non-formal sector qualifications included in the NQF

In **Scotland**, the SCQF Partnership together with credit rating bodies are responsible for ensuring the quality and integrity of the SCQF. The principles for the quality assurance of all qualifications (including non-formal education qualifications) in Scotland are defined in the SCQF Handbook developed by the SCQF Partnership. The method of applying these principles varies from sector to sector, but all credit rating bodies are required to operate quality assurance systems that include robust checks performed by an independent body or someone who is not employed by or part of the institution or organisation. As the system of credit rating is a

devolved one, it is important that there is a quality assurance system to monitor this process. This is carried out by a number of agencies: Education Scotland for further education colleges; Quality Assurance Authority (QAA) Scotland for higher education institutions and universities; SCQFP for other approved CRBs; Scottish Government and an independent auditor in the case of Scottish Qualifications Authority (SQA). All of these quality assurance arrangements include regular evaluations of the organisations, their learning programmes and their quality assurance systems.

In **Ireland**, Quality & Qualifications Ireland (QQI) is the national agency responsible for assuring the quality of qualifications included in the NQF. Under the 2012 Qualifications and Quality (Education and Training) Act, QQI had become both an awarding body and a quality assurance regulator across the ten levels without a demarcation between further education and higher education. Quality assurance requirements are intended initially for approval of a provider's competence and capacity to meet those requirements. If a provider successfully proves its competence and capacity, then the provider is free to apply for approval to offer programmes leading to QQI qualifications/awards. All providers of QQI qualifications/awards must apply for access/permission to provide such programmes. Guidance is available on the process and how to apply for permission to submit programmes for validation. Feedback from stakeholders indicated strongly that a single, unitary set of quality assurance guidelines across all ten levels would favour higher education providers unfairly. Consequently, there are now four kinds of quality assurance guidelines in Ireland: statutory quality assurance guideline; core guidelines for all providers; sector-specific guidelines; topic-specific guidelines.

In **France**, quality assurance is located at the provider level. The Ministry of Education along with CNCP is responsible only for the coordination of this process and assurance of general guidance. Organisations that own and award qualifications are responsible for their quality. The CNCP's remit does not include performing rigorous quality control checks. CNCP ensures that when the application for the inclusion of a qualification is submitted, it contains all documents relating to the charters, conventions and regulations regarding quality assurance, together with the conditions for issue of the qualifications in question. In this way, and only in this way, CNCP can act as a quality assurance body for qualifications that are not yet included in the register. So the procedure for inclusion in the register is akin to a quality assurance check and there is no "external" dedicated quality assurance procedure covering the issuing of diplomas, degrees or other qualifications. It might be said that the functioning of the French qualifications system is based on a firm assumption that all those institutions and bodies, including assessors, fully comply with expectations, standards and regulations. So, it is a kind of "contractual" quality assurance based on a priori commitments. It should be added, however, that the procedure of including qualifications in the French register is rather demanding – an awarding body, among others, must prove that a qualification is in demand in the labour market by providing details of employment obtained by learners from the groups of graduates for the last three years. This criterion provides a means of determining the relevance of the qualifications in the labour market and serves as an ex-ante quality check: if there is no demand on the market for this qualification

(either because of lack of labour market relevance or the poor quality of the provider) it cannot be submitted to the register.

In **Poland**, the system of quality assurance for non-formal sector qualifications included in the NQF had to be developed from scratch. New systemic solutions for ensuring the quality of qualifications came into force with the Act of 22 December 2015 on the Integrated Qualification Systems. The Act does not affect the principles or mechanisms of quality assurance in the formal general, vocational and higher education systems.

The quality assurance of non-formal sector qualifications consists of overseeing the validation and awarding processes, which are the responsibility of the relevant ministry. Awarding bodies are obliged to submit activity reports to the relevant ministries at least once every two years. Each awarding body functioning outside the formal general, vocational and higher education systems that wants to award qualifications to be included in the NQF must have internal and external quality assurance systems for their validation and awarding activities. The Minister Coordinator of the IQS maintains a list of institutions authorised to provide external quality assurance and announces a call for institutions to join this list at least once every three years. The relevant ministry for a given qualification appoints an external quality assurance entity by entering into a contract with that entity.

External quality assurance consists essentially of conducting regular external evaluations of the awarding body's validation and awarding processes, as well as its internal quality assurance system.

In the **Czech Republic**, the main coordinating role in the process of assuring the quality of qualifications included in the National Register of Qualifications (NSK) is the Ministry of Education, with other ministries responsible for particular fields of activity.

The Ministry of Education coordinates the activities of central administrative bureaux (ministries) in accordance with the law, and approves the content and form of all NSK qualifications. Other Ministries and authorising bodies participate in the development of qualifications standards, and decide on granting, extending the validity, or revoking the authorisation to award qualifications. Ministries are responsible for the supervision of the authorised bodies, and the maintenance of a register of the examination results of the authorised bodies, including the register of granted certificates. An authorised body can be any individual or organisation that fulfils the criteria set by law. These entities are authorised by the respective ministries according to their field of activity, e.g. the Ministry of Labour and Social Affairs provides authorisation in the areas of labour law relations, work safety, employment, pension security, and social care.

Sectoral councils, which bring together employer and employee representatives, play an important role in quality assurance in the Czech Republic. Sectoral councils develop occupational standards, which are the basis for developing qualifications, and are expected to be proactive in suggesting what new standards are needed and where standards should be updated.

In **Hungary**, all qualifications in the NQF are included in a quality assurance system developed at the ministerial level and regulated by relevant legal acts. Non-formal sector providers operating in the adult education sector can have their programmes accredited (known as the vocational programme requirement – VPR) and included in the NQF through a dedicated procedure managed by the Hungarian Chamber of Commerce and Industry – a public body functioning under the supervision of the Ministry of Economy. Each institution licensed to award VPR qualifications needs to perform a self-assessment according to the processes and indicators in the internal quality assurance plan, which is subject to an external assessment at least once every four years. The VPR system is a new element of the regulation of adult training in Hungary introduced only about a year ago. The aim of introducing VPRs was to establish uniform requirements and recognition for non-state vocational training to increase the transparency and “prestige” of non-formal sector qualifications in the labour market. Currently, there are discussions among stakeholders and experts in Hungary on whether this new system is too regulated and whether it poses too much of a burden on training institutions.

In **Croatia**, the qualifications framework was designed in a way that would allow all types and classes of qualifications to be included, following a process of accreditation. However, with regard to non-formal sector qualifications, the procedures of inclusion and quality assurance have not yet been finalised. In the Croatian qualifications system, all labour market oriented qualifications should be based on occupational standards, indicating the relevant skills and competences needed to perform specific occupations. As in the Czech Republic, the Croatian system provides sectoral councils with an important role. They are responsible for developing occupational and qualification standards and for the general harmonisation of Croatian qualifications with labour market needs. The operations of the sectoral councils are coordinated by the Ministry of Education.

4.7. Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system

Three basic variants can be distinguished for this characteristic:

- The roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Stakeholders have a strong role.
- Stakeholders have a weak role in the process of including non-formal sector qualifications in NQF-based qualifications systems.
- Public authorities have a dominant role in the process of including non-formal sector qualifications in NQF-based qualifications systems. Stakeholders play almost no role in the process of including qualifications.

In the balanced variant, stakeholders are involved in determining whether to include qualifications in the qualifications system and participate in determining the level of qualifications. Stakeholders play a significant role and their involvement

in the process of including qualifications is institutionalised. Stakeholders may even have veto power, i.e. the lack of their consent prevents a qualification from being included in the system. The institution representing stakeholders gathers a broad base of participants, including representatives of the formal education system (general, VET, HE), non-formal education, research institutions, and labour market institutions (employers' organisations, trade unions).

Stakeholders having a strong role in the qualifications system can influence the design of the system, especially regarding the procedures of inclusion, in such a way that includes the interest and needs of different groups, not only those who have the strongest voice and impact on policy.

It has to be taken into account, however, that involving stakeholders in deciding on the inclusion of qualifications may slow down the dynamics of including successive qualifications in the system. The submitted qualification will be required to go through more steps in the decision making process. But involving stakeholders may significantly contribute to the coherence and quality of the system as well as the relevance of the qualifications system to the needs of wider groups of stakeholders.

In the variant where social partners play a small role in the process of including non-formal sector qualifications in the system, they may participate in the inclusion process by acting as consultants to government decisions on inclusion or the assignment of NQF levels to qualifications, but their opinions are not binding on the government.

In the variant in which the role of public authorities is dominant, social partners are practically not involved at all in the process of including qualifications in the qualifications system.

4.8. Fees for including non-formal sector qualifications in the NQF

The fees for including non-formal sector qualifications can play an important role in the qualifications system. Revenues from fees may be used to finance the development of the system. Fees, however, will affect the incentives to include qualifications in the system. If the fees are too high, stakeholders may be prohibited from submitting significant qualifications, from the perspective of society, especially those institutions developing qualifications that are not looking to profit from them (e.g. qualifications developed in the voluntary sector). On the other hand, fees can be seen as means of enhancing efficiency by providing appropriate price signals – a consumer who pays a portion of the cost of a good or service is unlikely to use it unless it corresponds to a real need. Therefore, deciding to set fees for including qualifications in NQF-based systems may prevent the system from being used by institutions lacking good quality offers but having the time to prepare and submit applications. Fees could therefore limit this kind of “frivolous” use of the system.

Another decision to be taken is whether fees should be imposed for the inclusion of all types of qualifications or only some types. Usually, fees are set to cover the

costs of the inclusion process (costs of assessors, analysis, procedures), but they may be set below or above the actual cost of providing the service.

Two variants can be distinguished with respect to the issue of who pays for the submission of a qualifications in the system.

In the first approach, **the state finances** the whole process of including non-formal sector qualifications. This is the case in France. CNCP's activities, like those of the ministry responsible for vocational training, are classified as public services and, in France, anything classified as a public service is free. Applications and inclusions do, however, involve a cost to the state. The Ministry of Labour primarily covers these costs, and the budget for handling applications and entering qualifications in the register is from the budget allocated to the Ministry of Labour, and cannot be separated from it. According to the country report for Croatia, it is envisaged that the process of including non-formal sector qualifications will be free of charge there as well.

In the second approach, **submitting bodies pay for the inclusion of a qualification** and for being in the NQF-based qualifications system. This is the case in Ireland, Scotland, Poland, and Hungary. In Ireland, Poland, and Hungary, fees are determined by a centralised decision of public authorities, whereas in Scotland, the fees for inclusion are determined by the credit rating bodies (CRB) themselves. This results from the fact that a provider is able to choose the CRB to approach.

Although fees vary (see Table 11), the main rationale in all these countries for introducing fees is to cover the administrative costs of analysing the submissions of qualifications, and not to earn profits for the state or CRB, in the case of Scotland.

It should also be noted that in some systems, fees are also paid by the institutions applying to become awarding bodies recognised by the system. This is the case in Ireland and Poland. In these two countries, if an institution is a first-time applicant to become an awarding body for a given qualification, it pays an extra fee for the assessment of its capacity. As mentioned previously, Ireland is an interesting case, as the QQI charges fees to include type A qualifications awarded in the higher education sector.

Table 11. Fees for including non-formal sector qualifications in the NQF

Croatia	It is envisaged that there will be no fees. Including non-formal sector qualifications will be financed from the state budget.
Czech Republic	In the Czech Republic, the development of NSK and including qualifications in its register was accomplished with ESF Funds. However, the approved government document stipulates that the Ministry of Education will cover roughly 70% of total annual costs to maintain and further develop the NSK. Within multi-source financing, 30% of the set annual costs will be covered by employers to finance the operation of sector councils.
France	No fees in the system.
Hungary	Costs of the inclusion process for type B vocational training: a basic fee of EUR 322 + EUR 219 per training programme. Official external inspection every two years is performed by a regional government office, which is paid for by the state budget.
Ireland	5 000–10 000 EUR for the submission of quality assurance procedures to be approved for new providers. 1 000–10 000 EUR for an application for the validation of a programme (qualification).
Poland	Any entity applying to include a market qualification to the NQF is charged a fee of 2 000 PLN (approx. 500 EUR). Any entity applying to become an awarding body is charged a fee of 10 000 PLN (approx. 2 500 EUR).
Scotland	Costs of becoming a CRB: 4 600–8 000 EUR. Each credit rating body sets its own fee rate scheme.

Source: Own elaboration based on the NQF-in country reports.

Fees may be charged not only for submitting a qualification to the system, but also for various activities relating to the qualification after it has been entered in the system. Examples of other possible funding mechanisms include:

- Fees imposed on each issued certificate/qualification. The fee may be the same for all qualifications or differentiated by the type of qualification or type of awarding body
- Fees imposed on the income earned by the awarding body resulting from the profits gained from the qualification
- Fees for quality assurance checks – audits by external bodies or institutions

The fees relating to a qualification in the system usually serve to finance its operation. Sometimes they may be used to finance the external quality assurance mechanism (if there are no separate charges for this).

4.9. The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system

NQF-based qualifications systems are built in such a way as to create natural positive incentives for the inclusion of qualifications either in a short or longer period of time.

However, in some systems, having qualifications included in the qualifications system may be linked to certain benefits for persons wanting to attain a given qualification, for example, in the form of scholarships or the co-financing of education costs. Solutions can also include direct benefits for awarding bodies, such as tax exemptions, subsidies for didactic facilities, or others. The aim of providing formal and legal benefits is generally to encourage the inclusion of qualifications in the system to an even greater extent. See the solutions utilised in France:

Box 4. Benefits of including qualifications in the NQF system – the case of France

To ensure that the list of existing qualifications is as comprehensive and clear as possible, the French government introduced measures to encourage entities to have their qualifications listed in the register. Inclusion affords the qualifications, and hence the organisations that apply for their inclusion, certain rights:

- to award the qualifications as part of apprenticeships
- to receive funding for some continuing training initiatives
- to receive funding to cover VAE leave
- to work in regulated professions

Source: NQF-in French Country Report.

In Poland, discussions are underway about the issue of incentives and benefits, for example, at Stakeholders Council meetings and in the office of the Minister Coordinator, which are seen as crucial to encourage the inclusion of non-formal sector qualifications in the system. Several changes are being considered to the IQS Act (most likely to be amended at the end of 2018/beginning of 2019). The amendments will include a number of solutions to encourage involvement in the further development of the system.

5. Proposed models of including non-formal sector qualifications in NQFs

As presented in Chapter 1, the models of including qualifications in NQF-based qualifications systems discussed in this report are developed by **appropriately configuring selected variants distinguished for each of the listed characteristics.**

As a reminder, we present these characteristics below:

1. Types of qualifications that may be included in an NQF-based qualifications system, according to the proposed typology of qualifications in the NQF-in Project,
2. Ownership of the qualifications included in an NQF-based qualifications system,
3. Allowable level of similarity of the qualifications included in an NQF-based qualifications system,
4. Character of the legal regulations on including qualifications in an NQF-based qualifications system,
5. Scope of the regulations on including qualifications in an NQF-based qualifications system,
6. Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system,
7. Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system,
8. Fees for including qualifications in an NQF-based qualifications system,
9. The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system.

In this report, we assumed an understanding of the term “model” as a configuration of complementary legal, financial and organisational solutions on the inclusion of qualifications in a national qualifications system.

5.1. Properties of a qualifications system

In proposing theoretical models for the process of including qualifications in a qualifications system, the starting point is the impact of a given variant or configuration of variants on the properties of qualifications systems, which are presented in the table below.

Table 12. Properties of a qualifications system

Properties	Commentary
Coherence of the national qualifications system	<p>Coherence of the qualifications system means that a coherent approach is used for all qualifications in the system – particularly in terms of the way qualifications are described, the assignment of NQF levels, the quality of validation and certification, credit transfer and accumulation, and the role of the recognition of prior learning.</p> <p>In this report, coherence of the system means that its basic assumptions apply to all included qualifications, but take into account the specificity of each sub-sector of the qualifications system. Therefore, coherence does not mean a “mechanical” unification across the whole national qualifications system.</p>
Incentives for stakeholders to include qualifications in the national qualifications system	<p>Incentives are understood as solutions (procedures, benefits) that influence the motivation of different stakeholders to submit qualifications for inclusion in the qualifications system.</p> <p>Solutions in the national qualifications system may provide positive or negative incentives to stakeholders for submitting qualifications to be included in the system.</p>
Proliferation in the national qualifications system	<p>First, for the purposes of this report, proliferation means that there are many similar qualifications in the qualifications system.</p> <p>In another perspective, proliferation also means that many bodies are able to fulfil similar roles within the national qualifications system (developing, submitting, assigning NQF levels, awarding).</p>
Absorption capacity of the national qualifications system	<p>In this report, absorption capacity means the ability of the qualifications system to include a determined number of qualifications in the system in a given period of time.</p> <p>It may occur that an NQF-based qualifications system provides strong incentives to submit qualifications, but that the system is not able to include them in an appropriate period of time.</p>
Dominance of resourceful awarding bodies in the national qualifications system	<p>An NQF based qualifications system might be designed in a way that promotes resourceful bodies (organisational, financial resources).</p> <p>This may be the result of policy aims or an unintentional consequence.</p>

5.2. The relationships between the variants of characteristics and the properties of qualifications system

Each given variant (or configuration of variants) distinguished for the characteristics of the qualifications system presented in this report can influence the properties presented above. **It should be underlined that these variants can influence the properties of the system in various ways.** Decision-makers designing systemic solutions for the inclusion of non-formal sector qualifications should take into account the impact of different variants on the various properties of the qualification system.

For example, variants strengthening the coherence of a qualifications system may weaken incentives to submit qualifications for inclusion in the system. Variants providing incentives to submit qualifications can lead to excessive proliferation in the qualifications system.

Below we present our hypotheses regarding the impact of each presented variant on the properties of a qualifications system. These hypotheses were formulated based on the analysis of seven country reports prepared within the project and discussions with the experts participating in the NQF-in Project, as well as based on the outcomes of the literature review.

Table 13. Relationships between the variants of the characteristics and properties of a qualifications system

Symbols indicating the impact of the variants on the properties of a qualifications system used in the table				
Coherence of an NQF-based qualifications system	Incentives for the inclusion of qualifications-	Proliferation of qualifications in the system	Absorption capacities – including a large number of qualifications in the system in a short period of time	Dominance of “large” and resourceful awarding bodies in the qualifications system
<p>+ indicates that the given variant strengthens the coherence of the system</p> <p>- indicates that the given variant weakens the coherence of the system</p> <p>N (neutral) indicates that the given variant has no impact on this property of the qualifications system</p> <p>N / + indicates that the given variant has a moderate positive impact on the coherence of the system</p> <p>N / - indicates that the given variant has a moderate negative impact on the coherence of the system</p>	<p>+ indicates that the given variant strengthens the incentives of stakeholders to submit qualifications to the system</p> <p>- indicates that the given variant discourages stakeholders to submit qualifications to the system</p> <p>N (neutral) indicates that the given variant has no impact on this property of the qualifications system</p> <p>N / + indicates that the given variant has a moderate positive impact on incentives to submit qualifications to the system</p> <p>N / - indicates that the given variant has a moderate negative impact on incentives to submit qualifications to the system</p>	<p>+ indicates that the given variant favours proliferation</p> <p>- indicates that the given variant limits proliferation</p> <p>N (neutral) indicates that the given variant has no impact on this property of the qualifications system</p> <p>N / + indicates that the given variant has a moderate impact on favouring proliferation in the qualifications system</p> <p>N / - indicates that the given variant moderately limits proliferation in the qualifications system</p>	<p>+ indicates that the given variant favours the inclusion of a large number of qualifications in the system in a short period of time</p> <p>- indicates that the given variant does not favour the inclusion of a large number of qualifications in the system in a short period of time</p> <p>N (neutral) indicates that the given variant has no impact on this property of the qualifications system</p> <p>N / + indicates that the given variant has a moderate positive impact on absorption capacities</p> <p>N / - indicates that the given variant has a moderate negative impact on absorption capacities</p>	<p>+ indicates that the given variant favours the dominance of large and affluent awarding bodies in the qualifications system</p> <p>- indicates that the given variant does not favour the dominance of large and affluent awarding bodies in the qualifications system</p> <p>N (neutral) indicates that the given variant has no impact on this property of the qualifications system</p> <p>N / + indicates that the given variant moderately favours the dominance of large players in the system</p> <p>N / - indicates that the given variant moderately limits the dominance of large players in the system</p>

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
1. Characteristic: Types of qualifications that may be included in the system					
Variant 1.1 All types of qualifications may be included in the system	N	N	N	N	N
Variant 1.2 Only some types of qualifications may be included in the system	N	N	N	N	N
2. Characteristic: Ownership of qualifications in an NQF-based qualifications system					
Variant 2.1 Qualifications included in the system remain the property of the submitting institution	N This variant is rather neutral regarding the coherence of the system.	N / + This variant has a moderate positive impact on incentives for including qualifications. In principle, awarding bodies expect that they will maintain ownership of the qualifications they developed.	+ This variant contributes to the proliferation of qualifications in the system. This variant is in strong synergy with variant 3.1 with respect to proliferation in the system.	N This variant is neutral regarding absorption capacities.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 2.2 Qualifications included in the system become a public good	<p>N / +</p> <p>This variant moderately contributes to the coherence of the qualifications system.</p> <p>Introducing solutions using this variant contributes to limiting the number of similar qualifications in the system, which may indirectly positively affect the coherence of the system.</p>	<p>-</p> <p>This variant negatively affects incentives for submitting qualifications to the system as some institutions may not be willing to share their know-how and ideas with other institutions and the public.</p> <p>This may block international awarding bodies from submitting their qualifications to the system.</p>	<p>-</p> <p>This variant contributes to limiting the proliferation of qualifications in the system.</p> <p>Awarding bodies do not need to create new qualifications in order to enter the system, as they can apply to become awarding bodies for qualifications already included in the system.</p> <p>This variant is in strong synergy with variants 3.1 and 3.2 with respect to proliferation in the system.</p>	<p>N</p> <p>This variant is neutral regarding absorption capacities.</p>	<p>N / -</p> <p>This variant can moderately contribute to limiting the dominance of large and affluent awarding bodies, as these institutions will not be allowed to block “their” qualifications from other awarding bodies. Therefore, the risk of monopolisation and the concentration of qualifications in the system are lower.</p>

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
3. Characteristic: Allowable level of similarity of the qualifications included in an NQF-based qualifications system					
Variant 3.1 Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system (The system does not allow qualifications to be included that are similar to those already entered)	N This variant is rather neutral regarding the coherence of the qualifications system.	N This variant is rather neutral regarding the incentives for inclusion.	- This variant contributes to limiting the proliferation of qualifications in the system. This variant is in strong synergy with variants 2.1 and 2.2.	N This variant is neutral regarding absorption capacities. However, this variant implies that there will be a lesser number of qualifications included in the system than when variant 3.1 is applied.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 3.2 Similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualifications (The system allows similar qualifications to be included)	N This variant is neutral regarding coherence of the qualifications system.	N This variant is neutral regarding incentives for inclusion.	+ This variant contributes to the proliferation of qualifications in the system. This variant is in strong synergy with variant 2.1. If variant 3.2 and 2.1 are implemented, then the qualifications system will tend towards proliferation. This especially regards qualifications systems in larger countries, in which there are more awarding bodies offering similar qualifications.	N This variant is neutral regarding absorption capacities.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.
4. Characteristic: Character of the legal regulations on including qualifications in an NQF-based qualifications system					
Variant 4.1 Specific regulations on inclusion have the character of required legal norms	+ This variant has a positive impact on the coherence of the system. This variant is in strong synergy with variants 5.1 and 6.1.	N This variant is neutral regarding incentives for inclusion.	N This variant is neutral regarding proliferation of the qualifications system.	N This variant is neutral regarding absorption capacities.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.
General comment: Implementing this variant strengthens the impact of other variants					

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 4.2 Specific regulations on inclusion do not have the character of required legal norms	- / N In most countries, the lack of legal regulations makes it impossible to adopt coherent solutions across different areas of the qualifications systems. This variant is in synergy with variants 5.2 and 6.2.	N This variant is neutral regarding incentives for inclusion.	N This variant is neutral regarding proliferation of the qualifications system.	N This variant is neutral regarding absorption capacities.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.
5. Characteristic: Scope of the regulations on including qualifications in an NQF-based qualifications system					
Variant 5.1 Specific regulations govern all significant elements in the process of including qualifications	+ This variant positively affects the coherence of the qualifications system. This is in strong positive synergy with variants 4.1 and 6.1.	N / - This variant can negatively affect incentives for inclusion as the regulation defined at the central level may be too difficult to follow by some awarding bodies willing to submit their qualifications.	N This variant is neutral regarding proliferation of the qualifications system.	N This variant is neutral regarding absorption capacities.	+ This variant may strengthen resourceful institutions, as they are more likely to have the capacities required to adapt qualifications to specific regulations defined at the central level.

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 5.2 Only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders	- This variant will negatively affect the coherence of the system. This variant is in synergy with variants 6.2 and 4.2.	N / + This variant can positively affect incentives for inclusion. Submitting institutions will not be required to follow specific regulations, and therefore it might not be required for them to bear high costs of adapting their qualifications. Awarding bodies will have more flexibility in organising the processes of teaching, validating and certifying competences.	N This variant is neutral regarding proliferation of the qualifications system.	N This variant is neutral regarding absorption capacities	- This variant can contribute to promoting small players in the qualifications system, as it does not require all institutions to follow the same specific rules.
6. Characteristic: Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system					
Variant 6.1 One institution decides on including qualifications (as well as determines their level)	+ This variant positively affects the coherence of the system. This variant is in synergy with variants 4.1 and 5.1.	N This variant is neutral regarding incentives for inclusion.	N / - This may limit proliferation in the system. It is easier for one institution to "notice" that similar qualifications are being submitted for inclusion.	- One institution deciding on the inclusion of qualifications will need significant resources if there will be many applications. If it does not have the required resources, the system may become bottlenecked. In the short run, one institution may not have adequate resources to analyse many applicants for the inclusion of qualifications.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 6.2 Many institutions can decide on including qualifications (as well as determine their level)	N / - This variant may negatively affect the coherence of the system. This variant is in synergy with variants 5.2 and 4.2.	N This variant is neutral regarding incentives for inclusion.	N / + This may limit proliferation in the system. It is easier for one institution to "notice" that similar qualifications are being submitted for inclusion.	+ In the short run, a greater number of institutions can more easily absorb large numbers of applications for qualifications to be included in the system.	N This variant is neutral regarding the dominance of large and affluent awarding bodies.
7. Characteristic: Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system					
Variant 7.1 The roles of public authorities and social partners is balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role in the process of including qualifications.	N / + Involvement of a wide representation of stakeholders can contribute to enhancing the coherence of the system.	N / + Wide representation of stakeholders may better promote the system among different groups/institutions/bodies that may want to have their qualifications included in the system. Stakeholders can better reach different groups, including employers, to promote and communicate the aims and benefits of the NQF-based qualifications system.	N This variant is neutral regarding proliferation of the qualifications system	- Involving stakeholders in the decision-making process on including qualifications may slow down this process in the short run. However, it should be noted that this situation may be very beneficial for other aspects of the functioning of the qualifications system (e.g. quality assurance, adequacy in meeting social and labour market needs).	- Involving different stakeholders representing different institutions in the decision-making process may effectively protect the system from being dominated by large and resourceful institutions. The impact of this variant will largely depend on the composition of the stakeholders representation.

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 7.2 Social partners have a weak role in the process of including qualifications	N This variant is neutral regarding coherence of the qualifications system	N / + Stakeholders can better reach different groups, including employers, to promote and communicate the aims and benefits of the NQF-based qualifications system.	N This variant is neutral regarding proliferation of the qualifications system	N This variant is neutral regarding absorption capacities.	N / - Even a weak role of stakeholders, but representing different institutions, may effectively protect the system from being dominated by large and resourceful institutions.
Variant 7.3 Social partners have no role in the process of including qualifications	N This variant is neutral regarding coherence of the qualifications system	N This variant is neutral regarding incentives for inclusion.	N This variant is neutral regarding proliferation of the qualifications system.	N This variant is neutral regarding absorption capacities.	N This variant is neutral regarding the dominance of large and affluent awarding bodies
8. Characteristic: Fees for including qualifications in an NQF-based qualifications system					
Variant 8.1 Fees are incurred when including a qualification in the system	N / + Fees for including qualifications in NQF-based systems may prevent the system from being used by institutions lacking good quality offers but having the time to prepare and submit applications and therefore might contribute indirectly to strengthening coherence of the system.	- Fees negatively affect incentives to submit qualifications to the system. Fees have an especially strong effect on incentives to include qualifications if they are set at a high level.	N / - Fees may limit proliferation.	N / + Revenues from fees can be used to enhance absorption capacities.	+ Fees may strengthen the dominance of resourceful institutions, especially when fees are set at a high level.

Properties of a qualifications system					
	Coherence of an NQF-based qualifications system	Incentives for stakeholders to include qualifications	Proliferation	Absorption capacities	Dominance of resourceful institutions
Variant 8.2 No fees are incurred when including a qualification in the system	N / - No fees may excessively encourage stakeholders to submit qualifications for inclusion in the system even if they are of poor quality or even if there is no social need for them. This effect might be exacerbated if variant 6.2 and 5.2 are implemented.	N / + No fees may encourage stakeholders to submit qualifications for inclusion in the system.	N / + The lack of fees may contribute to proliferation in the system. Anyone could "feel encouraged" to submit a qualification to the system.	N This variant is neutral regarding absorption capacities.	N / - Lack of fees may limit the dominance of resourceful institutions.
9. Characteristic: The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system					
Variant 9.1 Including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)	N This variant is neutral regarding coherence of the qualifications system	+ This variant may have a strong effect on strengthening incentives to submit qualifications for inclusion in the system.	N This variant is neutral regarding proliferation of the qualifications system	N This variant is neutral regarding absorption capacities.	N This variant is neutral regarding the dominance of large and affluent awarding bodies

Properties of a qualifications system						
Variant 9.2 Including qualifications in the system provides no practical formal or financial benefits for various stakeholder groups	Coherence of an NQF-based qualifications system	N	This variant is neutral regarding coherence of the qualifications system	Incentives for stakeholders to include qualifications	N	This variant is neutral regarding incentives for inclusion.
	Proliferation	N	This variant is neutral regarding proliferation of the qualifications system	Absorption capacities	N	This variant is neutral regarding absorption capacities.
	Dominance of resourceful institutions	N	This variant is neutral regarding the dominance of large and affluent awarding bodies.			

Having analysed Table 13, the following observations can be made:

- Some variants are assumed to impact more on the properties of the qualifications system than other variants. The variants of the largest assumed impact (impacting on at least three presented properties of the qualifications system) are:
 - variant 2.2: qualifications included in the system become a public good
 - variant 5.1: specific regulations govern all significant elements in the process of including qualifications
 - variant 5.2: only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders
 - variant 6.1: one institution decides on including qualifications (as well as determines their level)
 - variant 6.2: many institutions can decide on including qualifications (as well as determine their level)
 - variant 7.1: the roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role.
 - variant 8.1: fees are incurred when including a qualification in the system.
- Some variants are in close synergy with other variants. Variants 2.1 and 3.1 are in close synergy favouring proliferation in the system whereas variants 2.2 and 3.2 are in synergy to limit proliferation. Variants 4.1, 5.1, 6.1 are in close synergy and are assumed to strengthen the coherence of the system, whereas variant 4.2, 5.2, 6.2 are assumed to weaken coherence.
- Variants that have the strongest impact on strengthening the coherence of the system (5.1, 6.1) and strongest impact on limiting proliferation (2.2, 3.1) at the same time contribute most to weakening incentives for stakeholders to submit qualifications to the system.
- Variants assumed to have the greatest impact on strengthening the coherence of the system and to limit proliferation are assumed to strengthen the dominance of resourceful institutions.
- Variant 7.1, representing a balanced role of public authorities and stakeholders, is the only variant that is expected to strengthen the coherence of the system and to limit the dominance of resourceful institutions.

In the table below, we present a summary of the assumed impacts of variants on the properties of a national qualifications system.

Table 14. Assumed impacts of the variants on the particular properties of the national qualifications system

Assumed impact	Variants
Strengthening coherence of the national qualifications system	<p>Variant 2.2: qualifications included in the system become a public good</p> <p>Variant 4.1: specific regulations on inclusion have the character of required legal norms</p> <p>Variant 5.1: specific regulations govern all significant elements in the process of including qualifications</p> <p>Variant 6.1: one institution decides on including qualifications (as well as determines their level)</p> <p>Variant 7.1: the roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role</p> <p>Variant 8.1: fees are incurred when including a qualification in the system</p>
Weakening coherence of the national qualifications system	<p>Variant 4.2: specific regulations on inclusion do not have the character of required legal norms</p> <p>Variant 5.2: only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p> <p>Variant 6.2: many institutions can decide on including qualifications (as well as determine their level)</p> <p>Variant 8.1: no fees are incurred when including a qualification in the system</p>
Strengthening incentives to submit qualifications to the national qualifications system	<p>Variant 2.1: qualifications included in the system remain the property of the submitting institution</p> <p>Variant 5.2: only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p> <p>Variant 7.1: the roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role</p> <p>Variant 8.2: no fees are incurred when including a qualification in the system</p> <p>Variant 9.1: including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)</p>
Weakening incentives to include qualifications in the national qualifications system	<p>Variant 2.2: qualifications included in the system become a public good</p> <p>Variant 5.1: specific regulations govern all significant elements in the process of including qualifications</p> <p>Variant 8.1: fees are incurred when including a qualification in the system</p>

Assumed impact	Variants
Limiting proliferation	<p>Variant 2.2: qualifications included in the system become a public good</p> <p>Variant 3.1: similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system</p> <p>Variant 6.1: one institution decides on including qualifications (as well as determines their level)</p> <p>Variant 8.1: fees are incurred when including a qualification in the system</p>
Favouring proliferation	<p>Variant 2.1: qualifications included in the system remain the property of the submitting institution</p> <p>Variant 3.2: similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualifications</p> <p>Variant 6.2: many institutions can decide on including qualifications (as well as determine their level)</p> <p>Variant 8.2: no fees are incurred when including a qualification in the system</p>
Increasing absorption capacities	<p>Variant 6.2: many institutions can decide on including qualifications (as well as determine their level)</p> <p>Variant 8.1: fees are incurred when including a qualification in the system</p>
Decreasing absorption capacities	<p>Variant 6.1: one institution decides on including qualifications (as well as determines their level)</p> <p>Variant 7.1: the roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role.</p>
Strengthening the dominance of resourceful institutions	<p>Variant 5.1: specific regulations govern all significant elements in the process of including qualifications</p> <p>Variant 8.1: fees are incurred when including a qualification in the system</p>

Assumed impact	Variants
Weakening the dominance of resourceful institutions	<p>Variant 2.2: qualifications included in the system become a public good</p> <p>Variant 5.2: only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p> <p>Variant 7.1: the roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role</p> <p>Variant 8.2: no fees are incurred when including a qualification in the system</p> <p>Variant 9.1: including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)</p>

5.3. Models

Policy documents formulated at the EU level (EQF Recommendation, New Skills Agenda for Europe, Cedefop, ETF, UNESCO, 2017) indicate that national qualifications frameworks referenced to the European Qualifications Framework should be coherent and transparent.

National qualifications frameworks referenced to the European Qualifications Framework (EQF) can be important policy instruments to promote mobility and lifelong learning at the national as well as the European level. However, in order to be a policy reform driver, an NQF has to be open to the various types of qualifications awarded in different educational sectors: type A, B, C. But being open is not enough; the system should have incentives for stakeholders to submit their qualifications and at the same time, should protect its coherence as well as prevent excessive proliferation.

In the NQF-in Project, models were constructed by configuring selected variants distinguished for each of the characteristics presented in this report. We propose four theoretical models of including qualifications in an NQF:

Model 1: Model for the coherence of an NQF-based national qualifications system

Model 2: Model for incentives to stakeholders to submit qualifications

Model 3: Model for the coherence of an NQF-based national qualifications system moderately incentivising stakeholders to submit qualifications

Model 4: Model for incentives to stakeholders to submit qualifications and the moderate coherence of an NQF-based qualifications system

The presented models were constructed based on an analysis of the relationships with variant 1.1. However, these models may also be useful in those systems allowing only certain types of qualifications to be included in national qualifications systems (variant 1.2).

The starting point in constructing these models was the observation that the variants with the strongest impact on the proposed properties of a qualifications system (variants: 2.2, 5.1, 5.2, 6.1, 6.2, 7.1, 8.1) are assumed to strengthen coherence, limit proliferation and weaken incentives for stakeholders to submit qualifications to the system. This observation implies that there may be a strong trade-off between the coherence of the system and incentives to submit qualifications.

Assuming that the trade-off between coherence and incentives may be significant, Model 1 and Model 2 represent configurations assumed to lead to two opposing effects: strong coherence, no proliferation, few incentives, or weak coherence, proliferation, many incentives.

Model 1 leads to the coherence of an NQF-based qualifications system in a country.

Model 2 leads to incentives for stakeholders to submit qualifications to an NQF-based system in a country.

Model 3 was developed based on Model 1. In Model 3, some variants limiting proliferation were replaced by variants strengthening incentives. As a result, Model 3 is still coherent but provides more incentives for submitting qualifications to the NQF. It is also assumed to favour proliferation more than Model 1.

Model 4 was developed based on Model 2. In Model 4, some variants strengthening incentives to submit qualifications to an NQF were replaced by variants strengthening coherence. Model 4 still provides strong incentives to stakeholders to submit qualifications and is still prone to proliferation, but at the same time, it strengthens coherence.

Based on the content of Table 13, more models could be proposed and analysed. We envisage that Table 13 could be good tool for analysing the assumed impact of different configurations of variants on the basic properties of a qualifications system. We also envisage that after discussions and consultations of this report with different groups of stakeholders, we could modify the models presented here.

If our observations regarding coherence, proliferation and incentives will be proven by other analyses, a discussion should be undertaken about how to promote NQF development in a way that enables many different types of qualifications to be included in national qualifications systems.

These four theoretical models provide a starting point in thinking about the use of models in designing the principles and procedures of including non-formal sector qualifications in NQF-based qualifications systems.

Model 1. Model for the coherence of an NQF-based national qualifications system

Table 15. Configuration of variants in Model 1

Characteristics of a qualifications system	Chosen Variants
1. Types of qualifications that may be included in an NQF-based qualifications system, according to the proposed typology of qualifications in the NQF-in project	<p>Variant 1.1 All types of qualification may be included in the qualifications system</p> <p>Variant 1.2 Only some types of qualifications may be included in the qualifications system</p>
2. Ownership of a qualification in an NQF-based qualifications system	<p>Variant 2.2 Qualifications included in the system become a public good</p> <p>Variant 2.1 Qualifications included in the system remain the property of the submitting institution</p>
3. Allowable level of similarity of the qualifications included in an NQF-based qualifications system	<p>Variant 3.1 Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system</p> <p>Variant 3.2 Similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualifications</p>
4. Character of the legal regulations on including qualifications in an NQF-based qualifications system	<p>Variant 4.1 Specific regulations on inclusion have the character of required legal norms</p> <p>Variant 4.2 Specific regulations on inclusion do not have the character of required legal norms</p>
5. Scope of the regulations on including qualifications in an NQF-based qualifications system	<p>Variant 5.1 Specific regulations govern all significant elements in the process of including qualifications</p> <p>Variant 5.2 Only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p>

Characteristics of a qualifications system	Chosen Variants
6. Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system	<p>Variant 6.1 One institution decides on including qualifications (as well as determines their level)</p> <p>Variant 6.2 Many institutions can decide on including qualifications (as well as determine their level)</p>
7. Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system	<p>Variant 7.1 The roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role.</p> <p>Variant 7.2 Social partners have a weak role in the process of including non-formal sector qualifications in NQF-based qualifications systems</p> <p>Variant 7.3 Social partners play no role in the process of including qualifications.</p>
8. Fees for including qualifications in an NQF-based qualifications system	<p>Variant 8.1: Fees are incurred when including a qualification in the system</p> <p>Variant 8.2 No fees are incurred when including a qualification in the system</p>
9. The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system	<p>Variant 9.2 Including qualifications in the system provides no practical formal or financial benefits for various stakeholder groups</p> <p>Variant 9.1 Including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)</p>

Commentary:

In constructing Model 1, the main aim was to select the combination of variants that ensure coherence (variants 4.1, 5.1, 6.1) and limit proliferation (variants 2.2, 3.1, 8.1).

This combination of variants is assumed to weaken incentives for stakeholders to submit qualifications (variants 2.2, 5.1, 8.1) as they will need to give up their ownership rights to the submitted qualifications and to pay fees for inclusion.

In Model 1, institutional and organisational requirements for including qualifications are set at a high institutional level. Following national rules that specifically regulate the process of including qualifications (selected variants 4.1 and 5.1) and fulfilling requirements to pay fees may be difficult conditions to meet for some stakeholders, e.g. voluntary and non-profit institutions. Resourceful institutions are more likely to have the necessary capacity required to develop new qualifications or adapt their existing ones to the requirements of the system. However, Model 1 is expected to protect the national qualifications system against monopolisation by the largest institutions functioning in this area. No institution can block other institutions from awarding qualifications that were included in the national qualifications system (selected variant 2.2).

Model 1 assumes that the inclusion of qualifications will require more effort from the state as well as stakeholders, but at the same time the national qualifications system is expected to be more coherent. Therefore inclusion of qualifications in the system will provide a strong signal to all stakeholders – especially learners and employers – that qualifications with an assigned NQF level are meeting national standards across different areas of the qualifications system. However, the number of these qualifications being included in the system will increase at a slow pace.

Model 2: Model for incentives to stakeholders to submit qualifications

Table 16. Configuration of variants in Model 2

Characteristics of a qualifications system	Chosen Variants
1. Types of qualifications that may be included in an NQF-based qualifications system, according to the proposed typology of qualifications in the NQF-in project	<p>Variant 1.1 All types of qualification may be included in the qualifications system</p> <p>Variant 1.2 Only some types of qualifications may be included in the qualifications system</p>
2. Ownership of a qualification in an NQF-based qualifications system	<p>Variant 2.1 Qualifications included in the system remain the property of the submitting institution</p> <p>Variant 2.2 Qualifications included in the system become a public good</p>

Characteristics of a qualifications system	Chosen Variants
3. Allowable level of similarity of the qualifications included in an NQF-based qualifications system	<p>Variant 3.2 Similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualifications</p> <p>Variant 3.1 Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system</p>
4. Character of the legal regulations on including qualifications in an NQF-based qualifications system	<p>Variant 4.2 Specific regulations on inclusion do not have the character of required legal norms</p> <p>Variant 4.1 Specific regulations on inclusion have the character of required legal norms</p>
5. Scope of the regulations on including qualifications in an NQF-based qualifications system	<p>Variant 5.2 Only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p> <p>Variant 5.1 Specific regulations govern all significant elements in the process of including qualifications</p>
6. Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system	<p>Variant 6.2 Many institutions can decide on including qualifications (as well as determine their level)</p> <p>Variant 6.1 One institution decides on including qualifications (as well as determines their level)</p>
7. Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system	<p>Variant 7.3 Social partners play no role in the process of including qualifications.</p> <p>Variant 7.1: The roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role.</p> <p>Variant 7.2 Social partners have a weak role in the process of including non-formal sector qualifications in NQF-based qualifications systems</p>

Characteristics of a qualifications system	Chosen Variants
8. Fees for including qualifications in an NQF-based qualifications system	<p>Variant 8.2 No fees are incurred when including a qualification in the system</p> <p>Variant 8.1: Fees are incurred when including a qualification in the system</p>
9. The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system	<p>Variant 9.1 Including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)</p> <p>Variant 9.2: Including qualifications in the system provides no practical formal or financial benefits for various stakeholder groups</p>

Commentary:

In constructing Model 2, the main aim was to select a combination of variants that support incentives to submit qualifications to the national system (variants 2.1, 3.2, 4.2, 5.2, 6.2, 7.3, 8.2). As noted above, focusing on incentives can lead to proliferation and the lack of coherence in the qualifications system.

In Model 2, the state is not required to develop specific rules on inclusion in the form of legal regulations (variants 4.1 and 5.1) which could allow the NQF system to include non-formal sector qualifications in a shorter period of time.

The absorption capacity envisaged by this model may be high, as many institutions will be able to decide on including qualifications (e.g. ministries, state institutions, sectoral organisations, stakeholders' councils). Stakeholders willing to submit qualifications in the system will not need to give up their ownership rights. Therefore, it is expected that including many new qualifications in the qualifications system is much easier than in Model 1.

Model 2 poses the risk that in the mid- and longer term, the system will become fragmented and unclear to learners and employers. This effect will probably differ in various countries.

Model 3: Model for the coherence of an NQF-based national qualifications system moderately incentivising stakeholders to submit qualifications

Table 17. Configuration of variants in Model 3

Characteristics of a qualifications system	Chosen Variants
1. Types of qualifications that may be included in an NQF-based qualifications system, according to the proposed typology of qualifications in the NQF-in Project	<p>Variant 1.1 All types of qualification may be included in the qualifications system</p> <p>Variant 1.2 Only some types of qualifications may be included in the qualifications system</p>
2. Ownership of a qualification in an NQF-based qualifications system	<p>Variant 2.1 Qualifications included in the system remain the property of the submitting institution</p> <p>Variant 2.2 Qualifications included in the system become a public good</p>
3. Allowable level of similarity of the qualifications included in an NQF-based qualifications system	<p>Variant 3.2 Similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualifications</p> <p>Variant 3.1 Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system</p>
4. Character of the legal regulations on including qualifications in an NQF-based qualifications system	<p>Variant 4.1 Specific regulations on inclusion have the character of required legal norms</p> <p>Variant 4.2 Specific regulations on inclusion do not have the character of required legal norms</p>
5. Scope of the regulations on including qualifications in an NQF-based qualifications system	<p>Variant 5.1 Specific regulations govern all significant elements in the process of including qualifications</p> <p>Variant 5.2 Only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p>

Characteristics of a qualifications system	Chosen Variants
6. Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system	<p>Variant 6.1 One institution decides on including qualifications (as well as determines their level)</p> <p>Variant 6.2 Many institutions can decide on including qualifications (as well as determine their level)</p>
7. Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system	<p>Variant 7.1 The roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role.</p> <p>Variant 7.2: Social partners have a weak role in the process of including non-formal sector qualifications in NQF-based qualifications systems</p> <p>Variant 7.3 Social partners play no role in the process of including qualifications.</p>
8. Fees for including qualifications in an NQF-based qualifications system	<p>Variant 8.1 Fees are incurred when including a qualification in the system</p> <p>Variant 8.2 No fees are incurred when including a qualification in the system</p>
9. The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system	<p>Variant 9.2 Including qualifications in the system provides no practical formal or financial benefits for various stakeholder groups</p> <p>Variant 9.1 Including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)</p>

Commentary:

In constructing Model 3, Model 1 was taken as the starting point. The crucial difference between Model 3 and Model 1 relates to the ownership and the similarity of qualifications.

In Model 3, stakeholders submitting qualifications will not need to give up their ownership rights (variant 2.1). Therefore, in Model 3, each awarding body that

included a qualification in the system is the owner of the qualification and no other institution can award the qualification without the consent of its owner.

Implementing variants 2.1 and 3.2 could result in proliferation in the qualifications system. This effect will be exacerbated if the fees are set at low levels (or if there are no fees), or if the state provides strong benefits for including qualifications in the NQF system (variant 9.2).

In Model 3, similarly as in Model 1, the institutional and organisational requirements for including qualifications are determined at a high institutional level.

Model 3 protects the coherence of the system but provides more incentives for stakeholders to submit qualifications than Model 1 in a trade-off favouring proliferation.

Model 4: Model for incentives to stakeholders to submit qualifications and the moderate coherence of an NQF-based qualifications system

Table 16. Configuration of variants in Model 2

Characteristics of a qualifications system	Chosen Variants
1. Types of qualifications that may be included in an NQF-based qualifications system, according to the proposed typology of qualifications in the NQF-in Project	<p>Variant 1.1 All types of qualification may be included in the qualifications system</p> <p>Variant 1.2 Only some types of qualifications may be included in the qualifications system</p>
2. Ownership of a qualification in an NQF-based qualifications system	<p>Variant 2.1 Qualifications included in the system remain the property of the submitting institution</p> <p>Variant 2.2 Qualifications included in the system become a public good</p>
3. Allowable level of similarity of the qualifications included in an NQF-based qualifications system	<p>Variant 3.2 Similarity to qualifications included earlier in the qualifications system does not preclude the ability to include the new qualifications</p> <p>Variant 3.1 Similarity to qualifications included earlier in the qualifications system precludes the ability to include the submitted qualification in the system</p>

Characteristics of a qualifications system	Chosen Variants
4. Character of the legal regulations on including qualifications in an NQF-based qualifications system	<p>Variant 4.1 Specific regulations on inclusion have the character of required legal norms</p> <p>Variant 4.2 Specific regulations on inclusion do not have the character of required legal norms</p>
5. Scope of the regulations on including qualifications in an NQF-based qualifications system	<p>Variant 5.1 Specific regulations govern all significant elements in the process of including qualifications</p> <p>Variant 5.2 Only general guidelines are provided, leaving a wide margin of discretion for specific stakeholders</p>
6. Degree of centralisation of the decisions taken on including qualifications in an NQF-based qualifications system	<p>Variant 6.2 Many institutions can decide on including qualifications (as well as determine their level)</p> <p>Variant 6.1 One institution decides on including qualifications (as well as determines their level)</p>
7. Role of different stakeholder groups in activities relating to the inclusion of qualifications in an NQF-based qualifications system	<p>Variant 7.3 Social partners play no role in the process of including qualifications.</p> <p>Variant 7.1: The roles of public authorities and social partners are balanced in the process of including non-formal sector qualifications in NQF-based qualifications systems. Social partners have a strong role.</p> <p>Variant 7.2 Social partners have a weak role in the process of including non-formal sector qualifications in NQF-based qualifications systems</p>
8. Fees for including qualifications in an NQF-based qualifications system	<p>Variant 8.1: Fees are incurred when including a qualification in the system</p> <p>Variant 8.2 No fees are incurred when including a qualification in the system</p>

Characteristics of a qualifications system	Chosen Variants
9. The formal, legal and financial benefits of having a qualification included in an NQF-based qualifications system	<p>Variant 9.1 Including qualifications in the system provides various types of formal and financial benefits to learners, training institutions and awarding bodies (scholarships, discounts, the right to seek financing or refunds)</p> <p>Variant 9.2: Including qualifications in the system provides no practical formal or financial benefits for various stakeholder groups</p>

Commentary:

In constructing Model 4, Model 2 was taken as the starting point. In Model 4, variants strengthening coherence (4.1, 5.1) and limiting proliferation (8.2) were introduced. As a result, Model 4 provides incentives to stakeholders to submit qualifications and is still prone to proliferation. However, at the same time, it strengthens the coherence of the system.

In Model 4, the state is required to make the effort to develop specific regulations (variant 4.1) in the form of legal norms (variant 5.1). But in comparison to Model 2, the state will not be required to provide substantial financial contributions to finance the inclusion of non-formal sector qualifications. Stakeholders need to pay fees for inclusion.

The absorption capacity envisaged by Model 2 could be high, as many institutions will be able to decide on including qualifications. Therefore, this model anticipates that the number of new qualifications in the system can grow at a significant rate while maintaining moderate coherence of the qualifications system.

References

- Allais, S. (2007). Why the South African NQF Failed: Lessons for Countries Wanting to Introduce National Qualifications Frameworks. *European Journal of Education, 42*(4).
- Allais, S. (2010). *The Implementation and Impact of Qualifications Frameworks: Report of a Study in 16 Countries*. Geneva: International Labour Office.
- Allais, S. (2011). What is a National Qualifications Framework? Considerations from a Study of National Qualifications Frameworks from 16 Countries. *Journal of Contemporary Educational Studies, 5*, 88–124.
- Allais, S. (2012). Claims versus Practicalities: Lessons about Using Learning Outcomes. *Journal of Education and Work, 25*(3).
- Allais, S. (2014). *Selling out Education: National Qualifications Frameworks and the Neglect of Knowledge*. Rotterdam: Sense.
- Allais, S. (2017a). Labour market outcomes of national qualifications frameworks in six countries. *Journal of Education and Work, 30*(5).
- Allais, S. (2017b). What does it mean to conduct research into qualifications frameworks? *Journal of Education and Work, 30*(7), 768–776.
- Allais, S., Raffe, D., & Young, M. (2009). *Researching NQFs: some conceptual issues*. International Labour Organization.
- Blackmur, D. (2004). A critique of the concept of a national qualifications framework. *Quality in Higher Education, 10*(3), 267–284.
- Blackmur, D. (2015). Arguing with Stephanie Allais. Are National Qualifications Frameworks instruments of neoliberalism and social constructivism? *Quality in Higher Education, 21*(2), 213–228. <https://doi.org/10.1080/13538322.2015.1071545>
- Bohlinger, S. 2012. Qualifications Frameworks and Learning Outcomes: Challenges for Europe's Lifelong Learning Area. *Journal of Education and Work, 25*(3), 279–297.
- Brockmann, M., L. Clarke, and C. Winch (2008). "Can Performance-related Learning Outcomes Have Standards? *Journal of European Industrial Training, 32*(2/3), 99–113.
- Brown, A. 2011. Lessons from Policy Failure: The Demise of a National Qualifications Framework Based Solely on Learning Outcomes in England. *Journal of Contemporary Educational Studies, 62*(5), 36–55.
- Cedefop (2013). Analysis and Overview of NQF Developments in European Countries. Annual report 2012. (Cedefop working paper; No 17). Luxembourg: Publications Office.

- Cedefop (2015). *National Qualifications Framework Developments in Europe – Anniversary Edition*. Luxembourg: Publications office of the European Union.
- Cedefop (2018). *National qualifications framework developments in European countries: analysis and overview 2015–16*. Luxembourg: Publications Office. Cedefop research paper No 65.
- Cedefop, ETF and UNESCO and UNESCO Institute for Lifelong Learning. (2017). *Global inventory of regional and national qualifications frameworks 2017. Volume I: Thematic chapters*. Cedefop.
- Chakroun, B. (2010). National qualification frameworks: From policy borrowing to policy learning. *European Journal of Education*, 45(2), 199–216.
- Clarke, L., & Winch, C. (2006). A European skills framework?—but what are skills? Anglo-Saxon versus German concepts. *Journal of Education and Work*, 19(3), 255–269.
- Coles Mike (2006) A review of international and national developments in the use of qualifications frameworks. European Training Federation.
- Coles, M., Keevy, J., Bateman, A., & Keating, J. (2014). Flying blind: policy rationales for national qualifications frameworks and how they tend to evolve. *International Journal of Continuing Education and Lifelong Learning*, 7(1), 17.
- Danowska-Florczyk, E., Debowski, H., Lasota, M., Poczanska, A., Przybylska, B., & Slawinski, S. (2018). The Challenge of Adapting Existing Qualifications for Inclusion in the NQF: Lessons Learned from the Twinning Project in Macedonia. *Level 3*, 14(1), 5.
- Dębowski, H., & Stęchły, W. (2015). Implementing ECVET Principles. Reforming Poland's Vocational Education and Training through Learning Outcomes Based Curricula and Assessment. *Warsaw Forum of Economic Sociology* 6:2(12).
- Dolowitz, D. P., & Marsh, D. (2000). Learning from abroad: The role of policy transfer in contemporary policy-making. *Governance*, 13(1), 5–23.
- Earp, J., & Ennett, S. (1991). Conceptual models for health education research and practice. *Health Educ Res*, 6(2), 163–171.
- ETF, Cedefop, and UNESCO Institute for Lifelong Learning. (2013). *Global National Qualifications Framework Inventory* (Report prepared for ASEM Education Ministers Conference, May 13–14). Kuala Lumpur: ETF, Cedefop, and UNESCO Institute for Lifelong Learning.
- Exworthy, M. (2008). Policy to tackle the social determinants of health: using conceptual models to understand the policy process. *Health Policy and Planning*, 23(5), 318–327.
- Greca, I. M., & Moreira, M. A. (2000). Mental models, conceptual models, and modelling. *International Journal of Science Education*, 22(1), 1–11.
- Hamarat, C., Kwakkel, J. H., & Pruyt, E. (2013). Adaptive robust design under deep uncertainty. *Technological Forecasting and Social Change*, 80(3), 408–418.
- Heemskerk, M., Wilson, K., & Pavao-Zuckerman, M. (2003). Conceptual models as tools for communication across disciplines. *Conservation Ecology*, 7(3).

- IBE (2018a), *Including Non-formal Sector Qualifications in National Qualifications Frameworks. The Experiences and Solutions of Seven European Countries. Volume I: Country Reports*. Warsaw: Instytut Badań Edukacyjnych.
- IBE (2018b), *Including Non-formal Sector Qualifications in National Qualifications Frameworks. The Experiences and Solutions of Seven European Countries. Volume II: Annexes*. Warsaw: Instytut Badań Edukacyjnych.
- Johnson, J., & Henderson, A. (2002). Conceptual Models: Begin by Designing What to Design. *Interactions*, 9(1), 25–32. <https://doi.org/10.1145/503355.503366>
- Keating, J. 2003. Qualifications Frameworks in Australia. *Journal of Education and Work*, 16(3), 271–288.
- Keating, J. 2011. "The Malaysian Qualifications Framework. An Institutional Response to Intrinsic Weaknesses. *Journal of Education and Work*, 24(3–4), 393–407.
- Keevy, J., and C. Borhene. 2015. *Levelling and Recognizing Learning Outcomes. The Use of Level Descriptors in the Twenty-first Century*. Paris: UNESCO.
- Mayer, R. E. (1989). Models for understanding. *Review of Educational Research*, 59(1).
- Méhaut, P., & Winch, C. (2012). The European Qualification Framework: skills, competences or knowledge? *European Educational Research Journal*, 11(3), 369–381.
- Murphy, A., & Dębowski, H. (2018). Is Higher Education Ambivalent Towards Inclusion of Non-Formal Qualifications in National Qualifications Frameworks (NQFs)? *European Higher Education Area: The Impact of Past and Future Policies* (pp. 547–568). Springer, Cham.
- Pilcher, N., Fernie, S., & Smith, K. (2015). The impact of National Qualifications Frameworks: by which yardstick do we measure dreams? *Journal of Education and Work*, 30(1), 1–12. <https://doi.org/10.1080/13639080.2015.1122178>
- Raffe, D. (2003). 'Simplicity Itself': the creation of the Scottish Credit and Qualifications Framework. *Journal of Education and Work*, 16(3), 239–257.
- Raffe, D. (2005). *National Qualifications Frameworks as Integrated Qualifications Frameworks*. SAQA Bulletin, 8(1), 21–31.
- Raffe, D. (2009). Towards a dynamic model of National Qualifications Frameworks. *Researching NQFs: Some conceptual issues*, 23–42. International Labour Organization.
- Raffe, D. (2011). Are 'Communications Frameworks' More Successful? Policy Learning from the Scottish Credit and Qualifications Framework. *Journal of Education and Work*, 24(3–4).
- Raffe, D. (2012). "What is the Evidence for the Impact of National Qualifications Frameworks? Comparative Education 49(2).

- Raffe, D. (2015). "First Count to Five: Some Principles for the Reform of Vocational Qualifications in England. *Journal of Education and Work*, 28(2).
- Singh, M. (2017). National Qualifications Frameworks (NQF) and Support for Alternative Transition Routes for Young People. *Vocational Education and Training in Times of Economic Crisis*. Springer.
- Tuck, R. (2007). *An introductory guide to national qualifications frameworks: Conceptual and practical issues for policy makers*. Geneva: ILO.
- Tuck, R., Hart, J., & Keevy, J. (2004). The relevance of the national qualifications framework impact study to qualification framework development in the Southern African development community. *SAQA Bulletin*, 6(2), 5–29.
- Walters, S. (2011). Optimism of the will, pessimism of the intellect: building communities of trust in South Africa. *SAQA Bulletin: Key Readings: The South African NQF 1995-2011*, 12(2), 155–168.
- Turner, M. G., Gardner, R. H., & O'Neill, R. V. (2001). *Landscape Ecology in Theory and Practice. Pattern and Process*. National Geographic.
- UNESCO Institute for Lifelong Learning, European Training Foundation, Cedefop (2015). *Global Inventory of Regional and National Qualifications Frameworks*. UNESCO Institute for Lifelong Learning, Germany.
- Wheelahan, L. (2011). From old to new: The Australian qualifications framework. *Journal of Education and Work*, 24(3–4), 323–342.
- Young, M. F. (2003). National qualifications frameworks as a global phenomenon: A comparative perspective. *Journal of Education and Work*, 16(3), 223–237.
- Young, M. (2005). *National qualifications frameworks: Their feasibility for effective implementation in developing countries*. International Labour Organization. Geneva.

ANNEXES

Annex 1. Types of qualifications in the literature and EU documents/materials

Quotation and source:	Comments:
<p>Global Inventory of Regional and National Qualifications Frameworks, Cedefop, ETF, UNESCO 2015</p> <p>“... in most European countries, the inclusion of formal qualifications in NQFs is based on sector-based legislation, not on uniform rules covering the entire framework.” p. 9.</p> <p>“The majority of the new NQFs have limited their coverage to formal qualifications awarded by national authorities or independent bodies accredited by these authorities. This means that frameworks predominantly cover initial qualifications offered by public education and training institutions. While there are exceptions to this general picture, most NQFs do not cover qualifications resulting from training and learning taking place in the non-formal and private sector”, p. 11</p> <p>“There appear to be two ways of providing quality assurance in this context. In the first case, non-formal qualifications are brought into the framework and they are submitted to a common quality assurance regime”, p. 22.</p> <p>“and the opening of qualifications frameworks to accommodate non-formal qualifications, such as those from industry, on a national level”, p.60.</p>	<p>No explicit definitions are provided in the report for different types of qualifications.</p> <p>The report uses different names to denote qualification types, most frequently: formal qualifications non-formal qualifications, private sector qualifications</p>

<p>Analysis and overview of national qualifications framework developments in European countries. Annual Report 2014, Working Paper no. 27, Cedefop 2015.</p>	<p>“Some countries, such as Austria, Germany, the Netherlands, Norway and Sweden, have started working on procedures for including non-formal and private sector qualifications and certificates. A key challenge faced by countries wanting to go beyond strictly regulated formal education and training is to ensure that the new qualifications in the framework can be trusted and meet basic quality requirements”, p. 40</p> <p>“Several other countries (including Denmark, Latvia, Slovenia and Finland) have indicated that this opening up towards the non-formal sector will be addressed in a second stage of their framework developments”, p. 40.</p> <p>“Some established frameworks, for example in France and the United Kingdom, have put in place procedures allowing ‘non-traditional’ qualifications to be included in the frameworks”, p. 40.</p> <p>“The French framework is also open to qualifications awarded by non-public bodies and institutions”, pp. 40-41.</p> <p>“The Dutch NQF (NLQF) makes it possible for private or non-formal qualification to be included in and levelled to the framework”, p. 41.</p>	<p>No explicit definition provided in the report for different types of qualifications.</p> <p>Different terms used:</p> <ul style="list-style-type: none"> non-formal sector qualifications private sector qualifications regulated formal education and training non-formal sector non-traditional qualifications <p>qualifications awarded by non-public bodies and institutions</p>
---	--	--

<p>European Commission, Proposal for a COUNCIL RECOMMENDATION on the European Qualifications Framework for lifelong learning and repealing the Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning, 10 June 2016.</p>	<p>The same goes for qualifications awarded outside the formal system and by international bodies and organisations. Insufficient trust in such qualifications reduces professional development, recruitment and promotion opportunities and further learning opportunities for the workers and learners who hold them, creating barriers to worker and learner mobility in the EU, within and between borders.</p> <p>All types and levels of qualifications are covered, including those resulting from formal education and training at all levels, but also private sector qualifications and international (sectoral) qualifications</p> <p>Some countries have focused their referencing on vocational education and training (VET) qualifications only, while other countries have not included their general education system in this process.</p> <p>The picture is even more diverse for private, non-formal and international qualifications, which in some countries are part of national qualifications frameworks, but not in others. The current Recommendation does not provide any means to guarantee that all types of qualifications (including those from the private sector) are part of national frameworks. Moreover, qualification systems and frameworks change over time and the Recommendation does not include an invitation to Member States to keep the referencing of their national framework to the EQF up to date.</p>	<p>No explicit definition provided in the document for different types of qualifications.</p>
<p>Discussion note on the possible revision of the European Qualifications Framework for the consultation meeting of 19 January 2016. EUROPEAN COMMISSION DG Employment, Social Affairs and Inclusion.</p> <p>"2. Insufficient comparability of national qualification systems: the qualifications frameworks referenced to the EQF have so far been mainly targeted towards referencing (thus comparing) national publicly awarded qualifications and less so (albeit with exceptions) towards qualifications from the private sector. Qualification systems and hence the elements addressed in the EQF referencing process also change over time. However the current Recommendation does not provide any means to guarantee that all types of qualifications (including those from the private sector) are part of national qualification systems nor to keep the referencing of national frameworks to the EQF updated", p. 4.</p>	<p>European Commission in the note to the EQF AG members distinguished between nationally publicly awarded qualifications and private sector qualifications.</p>	

<p>S. Allais, The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries, ILO, 2010</p>	<p>In Russia, while there is a strong emphasis on the recognition of prior learning routes to qualifications in theory, so far the sectoral qualifications frameworks which have been developed insist on formal education qualifications, and the proposed NQF also emphasizes formal education and training routes.</p> <p>“The idea of introducing an NQF can be seen as an attempt to develop one uniform set of levels which bring together the regulation of occupations and professions on the one hand, and educational qualifications on the other, in order to improve how these qualifications are understood and used” (...), p. 112.</p>	<p>No explicit definition provided in the report for different types of qualifications.</p> <p>The report does not explicitly refer to different types of qualifications which might be included in the NQF.</p> <p>However, the term “formal education qualifications” appears in the report.</p>
<p>R. Tuck, An Introductory Guide to National Qualifications Frameworks: Conceptual and Practical Issues for Policy Makers, ILO 2007.</p>	<p>“There are three main sectors of education and training with interests in an NQF: secondary schools; vocational education and training (VET) including work-based learning; and higher education”, p. 17.</p> <p>“New Zealand should probably now be regarded as a hybrid of linked and tracked because the NQF embraces VET and school qualifications, although with clear differences between the two while university qualifications are outside the NQF”, p. 21.</p> <p>The New Zealand NQF for example, distinguishes between ‘national qualifications’ which are on the NQF and ‘provider qualifications’ which are not.</p> <p>“There is a need to decide which qualifications are to be considered as ‘national qualifications’”, p. 27.</p> <p>“In what follows, it is assumed that the scope of the framework is comprehensive, i.e. including all sectors of education and training”, p. 36.</p> <p>Comprehensive framework: An NQF that includes all sectors of education and training in which qualifications are offered.</p>	<p>No explicit definition provided in the report for different types of qualifications.</p> <p>Definition of a comprehensive framework is provided in the glossary section of the report.</p>

<p>M. Young, National qualifications frameworks: their feasibility for effective implementation in developing countries, Skills Working Paper no. 22, ILO, 2005.</p> <p>This distinction refers to the scope of an NQF and is a recognition that the NQF includes <i>all</i> qualifications that are available only in some countries. "Scope" may refer to:</p> <p>qualification type, e.g. academic or vocational or those that are publicly or privately owned. Examples of the latter are CESCO and Microsoft qualifications, which play an important role for people seeking employment in these companies or in companies using their software, but are rarely included in NQFs.</p> <p>qualification level – many NQFs exclude university qualifications and there are countries like England, which have specific frameworks only for higher education qualifications.</p> <p>Cedefop (2010), The development of national qualifications frameworks in Europe, Working Paper no. 8.</p> <p>"The role of the CNCP as the 'gatekeeper' of the French framework is important. Any qualification registered in the CNCP irrespective of institutional origin (public, private, national, sectoral) can, in principle, be included in the framework. Registration of private qualifications requires, however, that they meet the criteria set by the CNCP as regards overall quality", p. 71 (France).</p> <p>"(...) while there are in principle no problems linked to the inclusion of state-owned qualifications, the links to and inclusion of other (private) qualifications pose a bigger challenge", p. 129 (Poland).</p>	<p>No explicit definition provided in the report for different types of qualifications.</p> <p>No explicit definition provided in the report for different types of qualifications.</p>
---	---

Annex 2. Examples of qualifications awarded in different EU countries categorised according to the proposed typology

<p>Qualifications awarded in NQF-in Project countries referenced to the proposed categorisation of generic types of qualifications:</p> <ul style="list-style-type: none"> – state regulated qualifications awarded in the education system (type A) – state regulated qualifications awarded outside the education system (type B) – non-state regulated qualifications (type C) 				
CROATIA				
Name [title] of a qualification	Awarding body	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/ regulations [if applicable]	Is the qualification included in the NQF/ registry of qualifications If yes at what level of the NQF? If not, can the qualification be included (do the required systemic solutions exist?)
State regulated qualifications awarded in the education system				
Note: below are listed all qualifications awarded in the national qualifications system in Croatia that could be referred to the category of <i>state regulated qualifications awarded in the education system</i>				
Certificate of completing eighth grade (compulsory primary school)	Public and private primary schools	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments)	Full qualification awarded	Yes Level 1 in the CROQF

Certificate of completion of one-year VET programmes	Public and private VET schools and Adult education institutions	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments) VET Act (30/09, with later amendments)	Full qualification awarded	Yes Level 2 in the CROQF
Certificate of completion of two-year VET programmes	Public and private VET schools and Adult education institutions	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments) VET Act (30/09, with later amendments)	Full qualification awarded	Yes Level 3 in the CROQF
Certificate of completion of three-year VET programmes	Public and private VET schools and Adult education institutions	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments) VET Act (30/09, with later amendments)	Full qualification awarded	Yes Level 4.1 in the CROQF
Certificate of completion of final work (four-year and five-year VET programmes)	Public and private VET schools and Adult education institutions	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments) VET Act (30/09, with later amendments)	Full qualification awarded	Yes Level 4.2 in the CROQF

Certificate on completion of Art education	Public and private Art schools	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments) Art Education Act (130/11, with later amendments)	Full qualification awarded	Yes Level 4.2 in the CROQF
Certificate on completion of State <i>Matura</i>	Public and private secondary schools (gymnasiums); National Centre for External Evaluation of Education	The Primary and Secondary School Education Act (Official Gazette (OG), OG 87/08, 86/09; 92/10; 105/10, 90/11, 5/12, 16/12, with later amendments) State Matura (127/10, with later amendments)	Full qualification awarded	Yes Level 4.2 in the CROQF
Certificate of completion of Master Craftsman Exam	Chamber of Trades and Crafts	Crafts Act (OG 77/93, 90/96, 102/98, 64/01, 71/01, 49/03, 68/07, 79/07, with later amendments)	Full qualification awarded	Yes Level 5 in the CROQF
Certificate of <i>Stručni Pristupnik</i> (Short-cycle)	Higher education institutions	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 5 in the CROQF
Diploma certifying the title of Professional Bachelor	Higher education institutions	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 6 in the CROQF

Diploma certifying the title of University Bachelor	Public and private universities	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 6 in the CROQF
Diploma certifying the title of Professional Specialist	Higher education institutions	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 7 in the CROQF
Diploma certifying the title of <i>Magistar</i> (Master of Science/Arts)	Public and private universities	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 7 in the CROQF
Diploma certifying the title of Doctor (for programmes in Medicine)	Public and private universities	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 7 in the CROQF
Diploma certifying the title of Specialist	Public and private universities	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 7 in the CROQF

Diploma certifying the title of <i>Magistar znanosti</i> (Master of Philosophy)	Public and private universities	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 8.1 in the CROQF
Diploma certifying the title of Doctor of Science/Arts (PhD)	Public and private universities	Act on Scientific Activity and Higher Education (OG 123/03, 198/03, 105/04, 174/04, 02/07, 46/07, 45/09, 63/11, 94/13, 139/13, 101/14, 60/15, with later amendments)	Full qualification awarded	Yes Level 8.2 in the CROQF
State regulated qualifications awarded outside the education system				
Note: below are presented examples of qualifications in the Croatian qualifications system that could be classified as state regulated qualifications awarded outside the education system.				
Certificate of a driving instructor	Private adult education institutions; Croatian Auto-club Association; Ministry of Internal affairs	Act on Croatian Auto-club Association (OG 2/94, with later amendments)	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of a professional vehicle driver for transport of dangerous goods	Private adult education institutions; Ministry of the sea, transport and infrastructure	Act on the Carriage of Dangerous Goods (OG 79/09 with later amendments)	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of a boat skipper	Private adult education institutions; Ministry of the sea, transport and infrastructure	Act on the Maritime Code (OG 181/04, 76/07, 61/11, 56/13, 26/15; Ordinance on boats and yachts (OG 27/05, 57/06, 80/07, 03/08, 18/09, 56/10, 97/12 and 137 / 13).	To be decided	Possible to include to the CROQF Level – to be decided

Certificate of trained seafarer (specifically for: for designed security duties, for bridge human resource management, etc.)	Private adult education institutions; Maritime Training Centre; Ministry of the sea, transport and infrastructure	Act on the Maritime Code (OG 181/04, 76/07, 61/11, 56/13, 26/15; Ordinance on Vocation and Ranks for Seafarers (OG 130/13);	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of real estate seller	Private adult education institutions	Law on Institutions (OG no. 76/93, 29/97, 47/99 and 35/08) and the Law on Education in Primary and Secondary Schools (OG no. 87/08, 86/09, 92/10, 105/10, 90/11, 16/12, 86/12, 94/13, 152/14 and 7/17)	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of social media marketing practitioner	Private adult education institutions	Law on Institutions (OG no. 76/93, 29/97, 47/99 and 35/08) and the Law on Education in Primary and Secondary Schools (OG no. 87/08, 86/09, 92/10, 105/10, 90/11, 16/12, 86/12, 94/13, 152/14 and 7/17)	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of a massage practitioner	Private adult education institutions	Law on Institutions (OG no. 76/93, 29/97, 47/99 and 35/08) and the Law on Education in Primary and Secondary Schools (OG no. 87/08, 86/09, 92/10, 105/10, 90/11, 16/12, 86/12, 94/13, 152/14 and 7/17)	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of European Computer Driving Licence (ECDL)	Public and private VET schools and Adult education institutions	Law on Institutions (OG no. 76/93, 29/97, 47/99 and 35/08) and the Law on Education in Primary and Secondary Schools (OG no. 87/08, 86/09, 92/10, 105/10, 90/11, 16/12, 86/12, 94/13, 152/14 and 7/17)	To be decided	Possible to include to the CROQF Level – to be decided

Certificate of tourist guide	Ministry of Tourism; Tourist agency, Professional association, Croatian Chamber of Economy; Croatian Chamber of Trades and Crafts, with the prior consent of the minister responsible for tourism	Law on the provision of services in tourism (Official Gazette 68/07, 88/10 and 30/14); Ordinance on tourist guides register (OG 50/08); Ordinance on tourist guides (OG 50/08); (OG 90/08); (OG 112/09); (OG 33/10); (OG 62/10) Ordinance on the Professional Examination for Tourist Guides and the Examination Program for Tourist Complaints (OG 50/08); (OG 120/08)	To be decided	Possible to include to the CROQF Level – to be decided
Non-state regulated qualifications				
Note: below are examples of qualifications in the Croatian qualifications system that could be classified as <i>non-state regulated qualifications</i> .				
Certificate of a breastfeeding advisor for a midwives	Croatian Chamber of Midwives; Croatian Chamber of Physicians; Life-long learning programme for midwives provided by Medical Faculty (Public university);	Medical Law (OG no. 121/03, 117/08); Statute of the Croatian Chamber of Physicians (OG no. 16/16); The law on midwives practice (OG 120/08, 145/10), Statute of the Croatian Chamber of Midwives	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of a hiking guide practitioner	Non-profit organisations: Hiking clubs	NA	To be decided; Market recognised qualification	Possible to include to the CROQF Level – to be decided
Certificate of a breastfeeding advisor	Non-profit organisation/voluntary organisation	NA	To be decided	Possible to include to the CROQF Level – to be decided

Certificate of foreign language skills	Non-profit organisation/voluntary organisation; Private schools; Adult education institutions	NA	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of make-up artist	Non-profit organisation; Private commercial companies	NA	To be decided	Possible to include to the CROQF Level – to be decided
Certificate of beekeeper	Non-profit organisation/voluntary organisation; Private schools; Adult education institutions	NA	To be decided; Market recognised qualification	Possible to include to the CROQF Level – to be decided

CZECH REPUBLIC

Name [title] of qualification	Awarding body	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/regulations [if applicable]	Is a qualification included in the NQF/registry of qualifications If yes at what level of the NQF? If not, can the qualification be included (does system solutions)?
<p>State regulated qualifications awarded in the education system</p> <p>Note: below are listed all qualifications awarded in the national qualifications system in the Czech Republic that could be referred to the category of <i>state regulated qualifications awarded in the education system</i></p>				
<p>a school report on the successful completion of basic education (the ninth grade or the tenth grade of basic education, the second grade of a sixth-year secondary general school (<i>gymnazium</i>), the fourth grade of an eight-year secondary general school (<i>gymnazium</i>) or the eight-year educational programme of a conservatoire), or a school report issued after successful completion of the course for achieving basic education</p>	<p>School</p>	<p>Act No. 561 of 24th September 2004, on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (the Education Act), with later amendments, Section 54</p> <p>Government Regulation No. 211 of 31st May 2010, on fields of studies in primary, secondary and higher vocational education, as amended</p>	<p>Non-qualification certificate awarded in accordance with the Education Act</p>	<p>corresponds to EQF 2 level</p>

<p>a school report on the successful completion of the course for achieving secondary education (for students with special education needs)</p>	<p>School</p>	<p>Act No. 561 of 24th September 2004, on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (the Education Act), with later amendments, Section 72 Government Regulation No. 211 of 31st May 2010, on fields of studies in primary, secondary and higher vocational education, as amended</p>	<p>Non-qualification certificate awarded in accordance with the Education Act</p>	<p>corresponds to EQF 2 level</p>
<p>the report on the final examination and an apprenticeship certificate (“výuční list”)</p>	<p>School examination boards</p>	<p>Act No. 561 of 24th September 2004, on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (the Education Act), with later amendments, Section 72 Government Regulation No. 211 of 31st May 2010, on fields of studies in primary, secondary and higher vocational education, as amended</p>	<p>Full qualification awarded in accordance with the Education Act</p>	<p>corresponds to EQF 3 level</p>
<p>a graduation <i>maturita</i> certificate (“<i>maturitní vysvědčení</i>”)</p>	<p>State examination boards; school examination boards</p>	<p>Act No. 561 of 24th September 2004, on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (the Education Act), with later amendments, Section 72 Government Regulation No. 211 of 31st May 2010, on fields of studies in primary, secondary and higher vocational education, as amended</p>	<p>Full qualification awarded in accordance with the Education Act</p>	<p>corresponds to EQF 4 level</p>

certificate of completion of a conservatoire (" <i>absolutorium</i> ") and a diploma of a conservatoire graduate	Conservatoires	Act No. 561 of 24th September 2004, on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (the Education Act), with later amendments, Section 89 Government Regulation No. 211 of 31st May 2010, on fields of studies in primary, secondary and higher vocational education, as amended	Full qualification awarded in accordance with the Education Act	corresponds to EQF 6 level
graduation report (" <i>absolutorium</i> ") and the diploma of a graduate of a tertiary professional school	Tertiary professional schools	Act No. 561 of 24th September 2004, on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (the Education Act), with later amendments, Section 101 Government Regulation No. 211 of 31st May 2010, on fields of studies in primary, secondary and higher vocational education, as amended	Full qualification awarded in accordance with the Education Act	corresponds to EQF 6 level

<p>certificates of completion of degree pre-graduate studies:</p> <p>diploma certifying the Bachelor's Degree (title of "bakalář" – Bc., "bakalář umění" – BcA.; both titles are used in front of the name)</p> <p>diploma certifying the Master's Degree (title of "magistr" – Mgr., "magistr umění" – MgA., "inženýr" – Ing., "inženýr architekt" – Ing. arch., "doktor medicíny" – MUDr., "doktor zubního lékařství" – MDDr., "doktor veterinární medicíny" – MVDr.; all titles are used in front of the name)</p>	<p>Higher education institutions</p>	<p>Act No. 111 of 22nd April 1998 (Amended and Consolidated), on Higher Education Institutions and on Amendments and Supplements to some other Acts (the Higher Education Act), with later amendments, Section 45</p> <p>Act No. 111 of 22nd April 1998 (Amended and Consolidated), on Higher Education Institutions and on Amendments and Supplements to some other Acts (the Higher Education Act), with later amendments, Section 46</p>	<p>Full qualification awarded in accordance with the Higher Education Act</p> <p>Full qualification awarded in accordance with the Higher Education Act</p>	<p>corresponds to EQF 6 level (Bachelor's Degree)</p> <p>corresponds to EQF 7 level (Master's Degree)</p>
<p>certificates of completion of degree post-graduate studies in advanced Master's degree programmes (title of "doktor práv" – JUDr., "doktor filozofie" – PhDr., "doktor přírodních věd" – RNDr., "doktor farmacie" – PharmDr., "licenciát teologie" – ThLic.; "doktor teologie" – ThDr.)</p>	<p>Higher education institutions</p>	<p>Act No. 111 of 22nd April 1998 (Amended and Consolidated), on Higher Education Institutions and on Amendments and Supplements to some other Acts (the Higher Education Act), with later amendments, Section 46</p>	<p>Advanced qualification awarded in accordance with the Higher Education Act</p>	<p>corresponds to EQF 7 level</p>

certificates of completion of degree post-graduate studies in Doctoral degree programmes (title of "doktor" – Ph.D., the title is used after the name)	Higher education institutions	Act No. 111 of 22nd April 1998 (Amended and Consolidated), on Higher Education Institutions and on Amendments and Supplements to some other Acts (the Higher Education Act), with later amendments, Section 47	Scientific qualification awarded in accordance with the Higher Education Act	corresponds to EQF 8 level
State regulated qualifications awarded outside the education system				
Note: below are presented examples of qualifications in the Czech qualifications system that could be classified as <i>state regulated qualifications awarded outside the education system</i> .				
Real Estate Agent (<i>Obchodník s realitami</i>)	Authorised persons; authorising body – the Ministry of Regional Development of the Czech Republic (<i>Ministerstvo pro místní rozvoj ČR</i>)	Act No. 179 of 30th March 2006, on the Verification and Recognition of Further Education Results Act No. 455 of 2nd October 1991, on licensed trade (the Trade Licensing Act) The Bill on the Real Estate Brokerage Services Act (2016)	Regulated profession	Qualification included in the National Register of Qualifications; corresponds to EQF 4 level
Detective / Intelligence services (<i>Detektiv zpravodajský pracovník</i>)	Authorised persons; authorising body – the Ministry of the Interior of the Czech Republic (<i>Ministerstvo vnitra České republiky</i>)	Act No. 179 of 30th March 2006, on the Verification and Recognition of Further Education Results	Regulated profession	Qualification included both in the National Register of Qualifications and the Database of Regulated Professions; corresponds to EQF 6 level

Orderly (<i>Sanitář</i>)	Ministry of Health of the Czech Republic (<i>Ministerstvo zdravotnictví České republiky</i>)	Act No. 96 of 4th February 2004, on non-medical health care professions	Regulated profession	Qualification included in the Database of Regulated Professions; no corresponding EQF level
Tax Adviser (<i>Daňový poradce</i>)	Examination board appointed by the Chamber of Tax Advisers of the Czech Republic (<i>Komora daňových poradců ČR</i>)	Act No. 523 of 20th October 1992, on Tax Advisory Services and the Chamber of Tax Advisers of the Czech Republic	Regulated profession	Qualification included in the Database of Regulated Professions; corresponds to EQF 6 level (entry requirements: Bachelor's Degree)
Attorney (<i>Advokát</i>)	Examination board appointed by the Czech Chamber of Attorneys (<i>Česká advokátní komora</i>)	Act No. 85 of 13th March 1996, on the Legal Profession	Regulated profession	Qualification included in the Database of Regulated Professions; corresponds to EQF 7 level (entry requirements: Master's Degree in Law)
Non-state regulated qualifications				
Note: below are examples of qualifications in the Czech qualifications system that could be classified as <i>non-state regulated qualifications</i> .				
ECDL Advanced Certificate	ECDL Czech Republic	N/A	Market qualification	
Microsoft Office Specialist Expert (MOS Expert)	Bodies authorised by Microsoft	N/A	Market qualification	
Autodesk – AutoCAD 2012 Certified Associate	Autodesk Certification Centres in the Czech Republic	N/A	Market qualification	

IRELAND

Name [title] of qualification	Entity awarding the qualification	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/regulations [if applicable]
<p>State regulated qualifications awarded in the education system</p> <p>Note: below are listed all qualifications awarded in the national qualifications system in Ireland that could be referred to the category of <i>state regulated qualifications awarded in the education system</i></p>			
Junior Certificate for completing lower secondary school	Department of Education & Skills		Major award in the NQF at Level 3
Leaving Certificate Established for completion of secondary school	Department of Education & Skills		Major award in the NQF at Level 5
Leaving Certificate Applied for completion of secondary school	Department of Education & Skills		Major award on the NQF at level 4
National Advanced Certificate for Regulated Craft Qualifications	QQI	DIT Act 1992 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 6

Higher Certificate for achievement of lower stage of bachelor level studies	QQI and/or higher education providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 6
Bachelor Degree (Ordinary)	QQI and /or higher education providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 7
Bachelor Degree (Honours)	QQI and/or higher education providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 8

Higher Diploma	Higher education institutions/ providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 8
Postgraduate Diploma	Higher education institutions/ providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 9
Masters	Higher education institutions/ providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 9

Doctorate/PhD	Higher education institutions/ providers	DIT Act 1992 University Act 1997 Education Act 1998 Qualifications (Education & Training) Act 1999 Qualifications and Quality Act 2012	Major award on the NQF at Level 10
State regulated qualifications awarded outside the education system			
Note: below are presented examples of qualifications in the Irish qualifications system that could be classified as <i>state regulated qualifications awarded outside the education system</i> .			
Security Officer	Private Security Authority	N/A	Regulated qualification
Tax consultant	Irish Tax Institute	N/A	Regulated qualification
Approved Driving Instructor	Road Safety Authority	N/A	Regulated qualification
Building Energy Regulator	Sustainable Energy Authority of Ireland	Building Control Act 2007	Regulated qualification
Gas Installer	Register of Gas Installers of Ireland	N/A	Regulated qualification
Psychotherapist (and 11 other professions)	Department of Health	Health and Social Care Professional Act 2005	Regulated professions and occupations
Non-state regulated qualifications			
Note: below are examples of qualifications in the Irish qualifications system that could be classified as <i>non-state regulated qualifications</i> .			
Air Traffic Controller	Irish Aviation Authority	N/A	Sector qualification
Pesticide Advisor	Department of Agriculture, Food and the Marine	5.1 No 155 of 2012 European Commission (Sustainable Use of Pesticides) Regulations	Market qualification

HUNGARY

Note: Qualification and Certification

The terms qualification and certificate (and their Hungarian translations) do not seem to be sufficiently precise for the adequate naming of the certifying documents. Despite the fact that legal regulations arrange for the names and types of the issuable certifying documents¹⁰, the use in Hungary cannot be considered mature.

Based on current legal regulations, the types of documents issued may be the following:

- *Leaving certificates of primary, secondary and special schools;*
- *Certificate of secondary school leaving examination (Maturity)*
- *Higher education diploma is a combination of a degree (Bachelor or Master) and a professional qualification;*
- *Vocational Qualifications recognised by the State; they can be partial, add-on and full qualifications and registered in the NVQR, significant proportion of NVQR qualifications can be acquired outside of the education system as well;*
- *Certificates issued in the non-formal sector (which, in Hungarian meaning, certifies the learning outcomes based on some sort of assessment, examination);*
- *Certification of Attendance, proving one's participation in the training.*

The use of the latter two is not always consistent.

¹⁰ The laws regulating the individual sectors of the education and training system clearly state what closing document can be issued for each training.

Name [title] of a qualification ¹¹	Awarding body	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/regulations [if applicable]	Is a qualification included in the NQF/register of qualifications If yes at what level of the NQF? If not, can the qualification be included (do the required systemic solutions exist?)
State regulated qualifications awarded in the education system				
Primary school leaving certificate	Public education institutions which can be public and private (foundation, private company, churches, etc.) providers as well	The Act on Public Education	Certificate of basic educational attainment	Yes, HuQF level 2

¹¹ According to legal regulation, degree as an official document can only be issued by a higher education institution, after the examinee has successfully taken the required exams. A “certificate” can be issued in general education, after the completion of primary and secondary level education, whereas VET institutions can issue qualifications. NVQR qualifications can also be obtained in a course outside the school system (based on a successful written and practical examination). In the case of courses, different trainings outside the NVQR, “only” a certificate can be issued (except the authority regulated qualifications). Presently there is a serious confusion in the training market regarding the names and real status of the issued certificates. Training companies like using impressive names otherwise positively accepted by training participants, which have no legal basis. In most cases the term “degree” and different foreign names such as “certificate” are fashionable.

Certificate of completing Bridge I programme	Designated public education institutions by a Government decision	The Act on Public Education and Vocational Education and Training	Bridge I. programme is special catch-up programme preparing students for further studies who did not finish primary school and get into secondary level education.	Yes, HuQF level 2
Certificate of completing Bridge II. programme	Designated vocational education institutions by a Government decision	The Act on Public Education and Vocational Education and Training	Certificate proves the completion of primary school and partial VET qualification	Yes, HuQF level 2
Leaving certificate of skills developing special vocational school	Special vocational schools, public and private	The Act on Vocational Education and Training, Government Decree on NVQR	Partial qualification	Yes, HuQF level 2
Leaving certificate and VET qualification of special vocational school	Special vocational schools, public and private	The Act on Vocational Education and Training, Government Decree on NVQR	Full and partial qualifications	Yes, HuQF level 3
Leaving certificate of secondary school	Secondary schools which can be public and private (foundation, private company, churches, etc.) providers as well	The Act on Public Education	Secondary school leaving certificate is a proof of accomplishment of secondary education and it is required to take a secondary school leaving examination.	Yes, HuQF level 4

Certificate of secondary school leaving examination (<i>Maturity</i>)	Secondary schools, public and private	The Act on Public Education, Government Decree on the secondary school leaving examination requirements.	Certificate of secondary school leaving examination is partly a prerequisite for entering the tertiary education and for some training programmes leading to VET qualifications.	Yes, HuQF level 4
NVQR Vocational qualification	VET schools, public and private providers	The Act on Vocational Education and Training, Government Decree on NVQR	NVQR partial vocational qualifications, which qualify holders for filling at least one scope of work.	Yes, HuQF level 2,3,4
(NVQR) Vocational qualification	VET schools, public and private providers	The Act on Vocational Education and Training, Government Decree on NVQR	NVQR add-on qualifications – give special expertise to supplement an already existing qualification	Yes, HuQF level 3,4,5
NVQR Vocational qualification	VET schools, public and private providers	The Act on Vocational Education and Training, Government Decree on NVQR	Full vocational qualifications	Yes, HuQF level 3, 4, 5, 6
Higher vocational education qualification	Higher education institutions, public and private providers	Act on higher education, Government decree on the list of higher education courses, Ministerial decree on the education and training outcomes requirement of higher education courses.	Full qualification after finishing higher education short cycle training programmes but do not give higher education degree and not equivalent with diploma.	Yes, HuQF level 5

Higher education diploma (Bachelor degree + higher education qualification, BA, BSc)	Higher education institutions, public and private providers	Act on higher education, Government decree on the list of higher education courses, Ministerial decree on the education and training outcomes requirement of higher education courses.	Full qualification	Yes, HuQF level 6
Higher education diploma (Master degree + higher education qualification, MA, MSc)	Higher education institutions, public and private providers	Act on higher education, Government decree on the list of higher education courses, Ministerial decree on the education and training outcomes requirement of higher education courses.	Full qualification	Yes, HuQF level 7
PhD degree	Higher education institutions, public and private providers	Act on higher education, Government decree on doctoral schools, procedures for doctoral training and habilitation	Scientific degree	Yes, HuQF level 8

<p>Postgraduate specialisation training certificate (in HE)</p>	<p>Higher education institutions, public and private providers</p>	<p>Act on higher education, Ministerial decree on the general conditions for organisation of postgraduate specialisation training</p>	<p>These 2- or 4-year-long programmes that can be chosen after the BA/BSc or MA/MSc programme do not give higher level degree. They are practice-oriented specialising trainings, which deepen or broaden the professional knowledge certified by the BA/BSc or MA/MSc degree, and they may be the criteria for another job in a workplace. Higher education institutions decide on postgraduate specialisation trainings in their own power.</p>	<p>Yes, HuQF level 6, 7</p>
---	--	---	---	-----------------------------

State regulated qualifications awarded outside the education system					
NVQR vocational qualification ⁸	Adult training providers, public or private	Act on Adult Training (type A trainings), Government Decree on NVQR	Full qualification	3, 4, 5, 6	
Other vocational training certificate	Adult training providers, public or private	Act on Adult Training (type B trainings)	So-called "other vocational trainings" or those registered by the Hungarian Chamber of Commerce and Industry (HCCI), whose vocational programme requirements (VPRs) have to be accepted in a special procedure.	Any level excluding 1 and 8 depending on the entry requirements and learning outcomes	
Foreign language certificate	Accredited language examination centres	Act on Adult Training (type C language training), Government Decree on procedures of state recognised foreign language examination and foreign language certificates (137/2008 Gov. decree)	Certificate proving foreign language proficiency	Not in the HuQF	
Certificate of 'other training programmes'	Adult training institutions: public and private providers, companies (internal training in enterprises)	Act on Adult Training, Type D: (e.g. catch-up programmes, general competence development trainings, supported workplace trainings)	Certificate of participation (In this category there are no elaborated programme requirements)	Not in the HuQF	

¹² Significant proportion of NVQR vocational qualifications can be awarded after examinations of adult training courses. In this case the form of training delivery is outside of education system, but the examination requirements are identical.

Qualification of authority regulated training and specialised professional trainings	Ministries and/or authorised providers	Sectoral laws and/or different sectoral government decrees	Regulated sectoral qualifications Practicing certain jobs in legal and medical professional positions requires specialised additional professional training	Not in the HuQF
Certificate obtainable within sectoral continuing in-service training	Ministries and accredited providers	Sectoral laws (for teachers, social workers, jurists, health sector, public administration, etc.)	Certificate of mandatory credit-based continuing in-service training system	Not in the HuQF
Master craftsman title	Hungarian Chamber of Commerce and Industry, Hungarian Chamber of Agriculture	Law of economic chambers Act on Vocational Training	This is not a qualification but a title Those already having a qualification can take a master craftsman examination after several years of professional practice.	Not in the HuQF
Non-state regulated qualifications				
Note: <i>Non-regulated adult trainings operating as a so called "free market" service, which usually include non-supported workplace trainings, or – in a more restricted definition – in-company trainings.</i>				
Sector/Company/Association certifies accepted internationally	Licensed provider, international organisation,	NA	Qualification, where programmes are based on licence. IT: Oracle, Cisco, Microsoft, Sport's Coach/Trainer, etc.)	Not in the HuQF
Certificate after completing competence development training programmes	Training providers in the free market	NA	NA	Not in the HuQF

certifying documents ¹³ issued on the free training market (ex: in-company training)	Training provider	Law of the commencing, conducting and general conditions of service provisions	NA	Not in the HuQF
Sectoral, international certificates (ex.: ECDL certificate)	Janos Neumann computer – science association	NA	ECDL certificate	Not in the HuQF

¹³ Although there are legal regulations for possible names of the papers, practically various names are used.

FRANCE

Name [title] of qualification	Awarding body	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/regulations [if applicable]
State regulated qualifications awarded in the education system			
Note: below are listed all qualifications awarded in the national qualifications system in France that could be referred to the category of <i>state regulated qualifications</i>			
CAP (<i>certificate of professional competence</i>)	Ministry of Education regional boards	Articles D 337-1 à D 337-25 of the Education code	Qualification developed on the recommendation of consultative professional committee
CAPA (<i>certificate of agricultural professional competence</i>)	Ministry of Agriculture Regional boards	Decree n° 2015-555 of 19 may 2015 relating to general regulation of the agricultural CAP	Qualification developed on the recommendation of consultative professional committee
Vocational <i>baccalauréat</i> and Vocational agricultural <i>baccalauréat</i>	Ministry of Education/ Agriculture Regional boards	Articles D.337-51 à D337-94 of the Education Code	Qualification developed on the recommendation of consultative professional committee
BTS (<i>higher technician certificate</i>)	Ministry of Education Regional boards	Decree n° 95-665 of 9 may 1995 on higher technician certificate general regulation	Qualification developed on the recommendation of consultative professional committee
BTSA (<i>higher agricultural technician certificate</i>)	Ministry of Agriculture Regional boards	Rural and maritime fisheries code, articles D811-139	Qualification developed on the recommendation of consultative professional committee
DUT (<i>University technological diploma</i>)	IUT (<i>University technological institute</i>)	Order of 3 August 2005 published in French Official Gazette (JO) of 13 August 2005	National higher education diplomas – Qualification developed on the recommendation of a national pedagogical commission

Bachelors	Higher institutions accredited by the ministry of higher education/CNESER to issue bachelors (i.e. universities, CNAM – National Conservatory of Arts and Crafts, business schools, schools of arts...)	Order of 23 April 2002 relating to university studies leading to bachelor degree	National higher education diplomas
Vocational bachelors	Higher institutions accredited by the ministry of higher education/CNESER to issue vocational bachelors (i.e. university department, University technological institute...)	Order of 17 November 1999 relating to vocational bachelor	National higher education diplomas
Masters	Higher institutions accredited by the ministry of higher education/CNESER to issue bachelors (i.e. universities, CNAM – National Conservatory of Arts and Crafts, business schools, school of arts ...)	Order of 25 April 2002 relating to Master	National higher education diplomas
Military special school of Saint-Cyr diploma	Military special school of Saint-Cyr (Ministry of higher education./Ministry of Defence)	Order of 27 February 2014 enabling military special school of Saint-Cyr to award a master degree	National higher education diplomas
Manager in business administration degree/ Master degree	Chamber of industry and commerce, Paris/ Paris Higher school of Commerce	Higher Education degree approved by the Ministry of Higher Education for 5 years by order of 24 July 2014	State-approved degree

Higher National school of decorative Art diploma/ Master degree	Higher National school of decorative Art (ENSAD)	Decree of 30 October 1998 giving a special status to the École nationale supérieure des Arts Décoratifs (ENSAD)	State-approved degree
Journalist	Journalist training centre (CFJ)	Order of 5 July 2012	State-approved degree
Design Diploma	School of Design, Nantes	Order of 28 June 2016 enabling Nantes School of Design (L'École de design Nantes Atlantique) to award a State-approved degree for 5 years.	State-approved degree
Business engineer	Kedge business school, Talence	Order of 29 August 2013 enabling Kedge business school to award a State-approved degree for 4 years.	State-approved degree
<i>Engineering diplomas of École centrale of electronics</i>	École centrale of electronics	Order of 26 January 2017 listing accredited engineering schools enabled to award engineering diplomas	Engineering diplomas
<i>Engineering diplomas of École de l'Air</i>	École de l'Air (Air force training school)	Order of 26 January 2017 listing accredited engineering schools enabled to award engineering diplomas	Engineering diplomas
State regulated qualifications awarded outside the education system			
Note: below are presented examples of qualifications in the French qualifications system that could be classified as <i>state regulated qualifications awarded outside the education system</i> .			
Vocational certificates	Awarding bodies accredited by regional boards of the Ministry of Labour	Articles L. 335-5, L. 335-6 and R. 335-13, R. 338-1 of Education code	Qualification developed on the recommendation of consultative professional committee

Homecare and educational assistant state diploma (DEAES)	Ministry of social affairs Regional boards/ Regional prefect	Decree n° 2016-74 of 29 January 2016 relating to Homecare and educational assistant state diploma and modifying social action and family Code	Qualification developed on the recommendation of consultative professional committee
State Youth, Popular Education and Sport Diploma (DEJEPS)	Ministry of Youth and Sport regional boards	Decree n° 2015-1527 of 24 November 2015 relating to professional certificate, state diploma and higher state diploma of the Ministry of Youth, Popular education and Sport	Qualification developed on the recommendation of consultative professional committee
Deck watch deputy officer	Military personnel division – Naval School	N/A	Qualification on behalf of the state and without recommendation from a tripartite advisory body (Ministry of Defence)
Universal catering agent	École des fourriers de Querqueville	N/A	Qualification on behalf of the state and without recommendation from a tripartite advisory body (Ministry of Defence)
Acting school national higher diploma	Higher education institutions accredited by Ministry of culture in the field of music, dance, theatre, circus arts	Decree of 27 November 2007 relating to national higher and professional degree awarded by higher education institutions accredited by Ministry of culture in the field of music, dance, theatre, circus arts and relating to accreditation procedure of these institutions	Higher education diploma (Ministry of culture)

Dance teacher state diploma : option contemporary dance	A list of Schools for dance teaching	Order of 21 February 2017 relating to practicing conditions of a dance teacher applicable to European citizens ... Order of 20 February 2017 renewing accreditation of a school leading to a dance teacher state diploma	Qualification on behalf of the state and without recommendation from a tripartite advisory body (Ministry of Culture)
Non-state regulated qualifications			
Note: below are examples of qualifications in the French system that could be classified as <i>non-state regulated qualifications</i> .			
Provider of Social and professional services to adults	CNAM – National Conservatory of Arts and Crafts (public higher education institution)	N/A	Private qualification
Building and public Works supervisor	CNAM – National Conservatory of Arts and Crafts (public higher education institution)	N/A	Private qualification
Manager of a social unit and services provider for elderly dependents	IEP – Institute for Political sciences (public higher education institution)	N/A	Private qualification
University diploma, Sports facilities manager award	University of Paris Nanterre (public higher education institution)	N/A	Private qualification
Heavy equipment operator used in the construction and rural engineering	CFPPA – vocational training and agricultural promotion Centre of Semur-Châtillon – La Barotte (public training provider belonging to the Ministry of agriculture)	N/A	Private qualification
Sales attaché	CCI France_ French chamber of commerce and industry	N/A	Private qualification

Communication and image consultant	Expression consulting	N/A	Private qualification
Socio-aesthetician	Paris Beauty Academy (PBA)	N/A	Private qualification
Electrician for performing arts	Performing arts Branch	N/A	Sectoral qualification
Manager for an hairdressing salon	National council of hairdressing salons	N/A	Sectoral qualification
Window cleaner works-at-height specialised	Federation of cleaning companies	N/A	Sectoral qualification

POLAND

Name [title] of a qualification	Awarding body	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/regulations [if applicable]	Is the qualification included in the NQF/registry of qualifications If yes at what level of the NQF? If not, can the qualification be included (do the required systemic solutions exist?)
State regulated qualifications awarded in the education system				
Certificate of completion of primary school	Public and private primary schools; Regional Examination Boards	The Act of September 7, 1991 on the Education System (Journal of Laws from 2015, item 2156, as amended)	Full qualification	Yes PQF level 1

Certificate confirming the qualification "Hairdresser Assistant"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Full qualification	Yes PQF level 2
Diploma confirming the qualification "Gardener"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Full qualification	Yes PQF level 3
Certificate confirming the qualification "Preparing meals and drinks (T.6.)"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Partial qualification	Yes PQF level 3
Diploma confirming the qualification "Technician trader (522305)"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Full qualification	Yes PQF level 4
Certificate confirming the qualification "Running a business (A.22.)"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Partial qualification	Yes PQF level 4
Diploma confirming the qualification "Teleinformatics technician (351103)"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Full qualification	Yes PQF level 5

Certificate confirming the qualification "Organisation and supervision of transport (A.28.)"	Regional Examination Boards	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Partial qualification	Yes PQF level 5
Diploma confirming the qualification "Librarian (343301)"	The state examination commission appointed by the director of the Centre for Artistic Education or the minister competent for culture and protection of national heritage	Regulation of the Minister of National Education of March 31, 2017 on the core curriculum of vocational education (Journal of Laws from 2017, item 860)	Full qualification	Yes PQF level 6
Diploma of completion of first-cycle studies on andragogy – University of Warsaw; Faculty of Pedagogy	University of Warsaw; Faculty of Pedagogy	The Act of 27 July 2005 Law on Higher Education	Full qualification	Yes PQF level 6
Diploma of completing uniform master's studies in the field of administration – University of Wrocław; Faculty of Law, Administration and Economics	University of Wrocław; Faculty of Law, Administration and Economics	The Act of 27 July 2005 Law on Higher Education	Full qualification	Yes PQF level 7
Diploma of doctor of biological sciences in the field of ecology – Uniwersytet im. Adam Mickiewicz in Poznań; Department of Biology	Uniwersytet im. Adam Mickiewicz in Poznań; Department of Biology	Act of 14 March 2003 on academic degrees and academic title, and degrees and title in the field of art	Full qualification	Yes PQF level 8

State regulated qualifications awarded outside the education system				
Inspector of treasury control	General Inspector of Fiscal Control after the exam, which is carried out by a commission appointed by the General Inspector of Fiscal Control	Art. 39 of the Act of 28 September 1991 on Fiscal Control (Journal of Laws from 2011 No. 41, item 214, as amended)	Partial qualification	No Possible to include to the PQF; level – to be decided
Diver Class III	Qualifying Committee for Divers, operating at the Directorate of the Maritime Office in Gdynia	Act of 17 October 2003 on underwater works (Journal of Laws from No. 199, item 1936); Regulation of the Minister of Infrastructure of 25 June 2010 on the training and examination of persons applying for the right to perform underwater works (Journal of Laws No. 126, item 856)	Partial qualification	No Possible to include to the PQF; level – to be decided
Judge	Examination commission appointed by the Minister of Justice	Act of 27 July 2001 – Law on the system of common courts (Journal of Laws No. 98, item 1070, as amended); Act of 23 January 2009 on the National School of Judiciary and Prosecutor's Office (Journal of Laws No. 26, item 157, as amended); Regulation of the Minister of Justice of March 1, 2011 on the conduct of the judge's and prosecutor's examination (Journal of Laws No. 54, item 283)	Partial qualification	No Possible to include to the PQF; level – to be decided

Legal Counsel	Examination board appointed by the Minister of Justice	Act of 6 July 1982 on legal advisers (Journal of Laws from 2010, No. 10, item 65, as amended)		No Possible to include to the PQF; level – to be decided
Non-state regulated qualifications				
Carpentry assembly in construction	Fundacja VCC	Announcement of the Minister of Infrastructure and Construction of 7 July 2017 on the inclusion of market qualification “Carpentry assembly in construction” to the Integrated Qualification System	Partial qualification	Yes PQF level 3
European Computer Driving Licence (ECDL)	Polskie Towarzystwo Informatyczne (<i>Polish Information Society</i>)	n/a	n/a	No Possible to include to the PQF; level – to be decided
Certified Animal Caretaker “PETSITTER”	Centre Of Applied Pet Ethology COAPE Polska	n/a	n/a	No Possible to include to the PQF; level – to be decided
Operator of CNC machine tools	e.g. private training companies	n/a	n/a	No Possible to include to the PQF; level – to be decided
Confectioner – Master’s diploma	Chamber of Crafts	The Act of 22 March 1989 on Crafts	n/a	No Possible to include to the PQF; level – to be decided

SCOTLAND

Name [title] of qualification	Awarding body	Legal acts that are the basis for awarding the qualification [if applicable]	Type of qualification as defined in national legislation/regulations [if applicable]
<p>State regulated qualifications awarded in the education system</p> <p>Note: below are listed examples of qualifications awarded in the national qualifications system in Scotland that could be referred to the category of <i>state regulated qualifications awarded in the education system</i></p>			
<p>National Awards 1 – 5 Offered in schools</p>	<p>Scottish Qualifications Authority (SQA)</p>	<p>SQA is mandated by Scottish Government to develop and award school qualifications therefore it can be said that school qualifications are state regulated</p>	<p>Full qualifications</p>
<p>Higher and Advanced Higher Awards Offered in schools</p>	<p>Scottish Qualifications Authority (SQA)</p>	<p>SQA is mandated by Scottish Government to develop and award school qualifications therefore it can be said that school qualifications are state regulated</p>	<p>Full qualifications</p>
<p>Higher National Certificate Offered in colleges and some Higher Education Institutions and in training centres</p>	<p>Scottish Qualifications Authority (SQA)</p>	<p>Note: Although SQA is set up by statutory legislation not everything SQA accredits or awards is “state regulated”.</p>	<p>Full qualification</p>
<p>Higher National Diploma Offered in colleges and some Higher Education institutions and in training centres</p>	<p>Scottish Qualifications Authority (SQA)</p>		<p>Full qualification</p>

State regulated qualifications awarded outside the education system				
<p>Note: below are presented examples of qualifications in the Scottish qualifications system that could be classified as awarded outside the education system. There will also be qualifications that sit outside the national body as well as outside the SCQF which are mandated by the State, e.g. Gas Safe Register. To get onto the Gas Safe Register individuals need to achieve the SVQ in Domestic Natural Gas Installation and Maintenance. Likewise, SVQ's in Health and Social Care are a requirement to be registered with the Scottish Social Services Council.</p>				
Dangerous Goods Safety Adviser	Department of Transport	State requirement to hold the qualification work in the industry	Non-regulated qualification	Non-regulated qualification
Certificate of Professional Competence (HGV Driver)	Department of Transport	Required by European legislation and also a state requirement	Non-regulated qualification	Non-regulated qualification
Oil and Gas Sector Survival Course	Private training providers	Mandatory requirement in the sector	Non-regulated qualification	Non-regulated qualification
Scottish Certificate for Personal Licence Holders	SQA	Qualification required by law	Regulated qualification	Regulated qualification
Award in Emergency Paediatric First Aid	SQA	Legal requirement to be able to work in the sector	Regulated qualification	Regulated qualification
Non-state regulated qualifications				
<p>Note: below are examples of qualifications in the Scottish qualifications system that could be classified as <i>non-state regulated qualifications</i>.</p> <p>UK legislation very rarely refers to the specific qualification. It normally refers to a register or a licence to practice. With a licence to practice for e.g. a Door Supervisor Award enables an individual to apply for a licence. Legislation then requires the individual to undertake training specified by the Security Industry Authority (SIA). The SIA produces training specifications but has decided that to ensure the training is of an acceptable quality then individuals must achieve the qualification. The qualification specification is based on the training specification. The SIA then requires the qualification to be accredited by SQA in Scotland. Thus, in this case there is no state requirement to hold the qualification but the regulator does require the qualification.</p>				
Advanced ECDL	British Computer Society	N/A	Market qualification	Market qualification
Introduction to Actor Training	Royal Conservatoire of Scotland	N/A	Market qualification	Market qualification
Diploma in Deafblind Studies	Deafblind	N/A	Market qualification	Market qualification
Strategic Community Safety	Police College Scotland	N/A	Market qualification	Market qualification
Walking Tour Guiding	Mercat Tours Scotland	N/A	Market qualification	Market qualification