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## **Problems with National Qualifications Frameworks in practice. The English case**

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## Nationaler Qualifikationsrahmen

„Castle in the Cyberspace“ oder Förderung  
der Erwachsenenbildung?

Problems with National Qualifications  
Frameworks in practice

The English case

Alan Brown



# Problems with National Qualifications Frameworks in practice

## The English case

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### Abstract

National (and European) qualifications frameworks which map qualifications in a similar way according to the specification of learning outcomes and then assign them a unique position within a hierarchical system of levels have proved very attractive to policy makers. They offer the prospect of improving transparency between qualifications and aiding mobility, but as with all policies the acid test is how the policy is implemented in practice. As many countries now consider how to implement a National Qualifications Framework (NQF), it is perhaps instructive to look at the reasons for the policy failure of an NQF based exclusively on learning outcomes in England. The major lesson to be learned is that a focus on competence, mapping qualifications, levels and outcomes can become a distraction from the much harder goal of improving the quality of teaching and learning. Shifting attention to a developmental approach to the development of expertise may be more effective by highlighting the importance of processes of learning and the need to support the development of expansive learning environments in education, training and employment. Recognising that the development of an NQF has an important but limited part to play in this process, and that a „rough guide“ to equivalence will often be sufficient in mapping potential progression pathways, may be a useful starting point for this shift.

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# Problems with National Qualifications Frameworks in practice

## The English case

**Alan Brown**

**The intention of this article is to facilitate policy discussion about NQF design by outlining some of the particular problems encountered, and pitfalls for other countries to avoid, in the English experience of designing an NQF based on the exclusively on learning outcomes.**

### Introduction

Qualifications frameworks which map qualifications in a similar way according to the specification of learning outcomes have proved very attractive to policy makers and Europe has adopted a European Qualifications Framework (EQF). This development has acted as a spur for many countries to consider implementing a National Qualifications Framework (NQF). So it is perhaps instructive to look at the policy failure of an NQF based exclusively on learning outcomes in England and address the broader question of whether a focus on competence, mapping qualifications, levels and outcomes can become a policy distraction from the much harder goal of improving the quality of teaching and learning. Shifting attention to a developmental approach to developing skills and expertise may be an alternative way to drive moves towards a more knowledge-based society, replacing an essentially binary conception of competence at the heart of a hierarchical system of levels (Brown 2009).

The intention of this article is to facilitate policy discussion about NQF design by outlining some of the particular problems encountered, and pitfalls for other countries to avoid, in the English experience of designing an NQF based on the

exclusively on learning outcomes. Often policy learning is focused on policy development and by the time it is realized that policy implementation in the original case has been unsuccessful too much momentum has already been established behind the new development. The author is well placed to provide an overarching commentary on the English NQF policy failure having participated in five major national and European projects, over the past twenty-five years, which have reviewed the implications of the introduction of competence-based curricula (Haffenden/Brown 1989), the need to design learning programmes to promote a broader occupational competence (Brown 1998) and the limitations of levels, learning outcomes and qualifications as drivers towards a more knowledge-based society (Brown 2008). Overall, the lesson from the English experience is clear that an emphasis on qualifications development needs to be balanced with equal concern about how learning and development will be facilitated in practice.

### Context: European Qualifications Framework

In September 2006, the European Commission adopted a proposal to establish a European

Qualifications Framework for lifelong learning (Commission of the European Communities 2006). The aim was to relate all education and training awards in Europe and provide a common language to describe qualifications across the European Union's diverse education and training systems. However, the development of national frameworks of qualifications remains an area of national responsibility, and the EQF is a referencing tool or translation device against which national frameworks can be compared, rather than an entity into which National Qualifications Frameworks have to fit. The EQF provided momentum for member states to consider introducing NQFs, although decisions about the value, development and implementation of a NQF are also framed by wider national discussions about priorities in the field of education, training and qualifications. The idea of having greater transparency between qualifications across Europe is widely accepted as an aspirational goal, but whether it is a good idea for all qualifications to be expressed in a similar way is partly an empirical question of whether the benefits outweigh the considerable transaction costs, but it is also a pedagogical issue concerned with the most appropriate forms of teaching, learning and assessment required to meet particular educational goals.

One core element of the EQF is a set of eight reference levels describing what a learner knows, understands and is able to do – their “learning outcomes” – regardless of the system where a particular qualification was acquired (European Commission 2008). The EQF reference levels are intended to support a better match between the needs of the labour market (for knowledge, skills and competences) and education and training provision; facilitate the validation of non-formal and informal learning; and facilitate the use of qualifications across different education and training systems. The EQF covers general and adult education, as well as Vocational Education and Training (VET) and Higher Education (HE). The eight levels are intended to cover all qualifications from those achieved at school to those awarded at the highest level of academic, professional or VET. The role of the EQF was intended to function as a translation device to make relationships between qualifications and different systems clearer, to make education and

training more transparent and to adapt both to the demands of the knowledge society and to the need for an improved level and quality of employment. Now increased transparency is a worthwhile goal in its own right, but a more highly qualified workforce does not necessarily equate to a more highly skilled and more knowledgeable workforce.

The focus on levels, qualifications and learning outcomes can be comforting because it gives the illusion of progress, but a much more sophisticated model of skill development and expertise is required to underpin meaningful movement towards a knowledge society. However, first, it may be instructive to examine the reasons behind the policy failure of an NQF based exclusively on learning outcomes in England.

### **Example of a policy failure of an NQF based exclusively on learning outcomes**

The starting point for any analysis of English policy in the area of vocational qualifications was the almost complete failure of the attempted reformation of VET through the introduction of outcomes-based National Vocational Qualifications (NVQs) in the decade following 1986 (Williams 1999). The standards of occupational competence upon which the NVQs were based were too narrow; employers were reluctant to use the new qualifications; and the introduction of NVQs exacerbated, rather than mitigated, the “jungle” of vocational qualifications. In the mid-1990s unsuccessful attempts were made to restructure NVQs following a series of highly critical reports (Beaumont 1996; Dearing 1996; Hyland 1998), but the National Council for Vocational Qualifications (NCVQ) and associated agencies continued to market the system overseas, without acknowledging the failings of NVQs and the competence-based education and training outcomes-driven system. Hyland (1998) highlighted how this was a strange case of exporting policy failure. The model was held up as promising reform even though it had not worked in practice in England.

Since then NVQs have been further reformed, a wider range of vocational qualifications have been encouraged and NCVQ was abolished and

replaced by the Qualifications and Curriculum Development Authority (QCDA), which had responsibility for the development of a National Qualifications Framework. However, the whole area of qualifications reform remained a policy failure and the decision was taken to replace the NQF with a Qualifications and Credit Framework (QCF) and when a new government came to power in 2010 they announced they would abolish the QCDA. In opposition they had used the QCDA as their prime example of abolishing of how a quasi-governmental organisation could be abolished without any ill effects whatsoever.

The reason for the move away from an exclusive focus on NQF outcomes, levels and qualifications were that they were too prescriptive – they excluded too many valuable qualifications, the system was too inflexible, did not support progression very well and “level” was not a very good discriminator of the value of a qualification. The QCF uses volume as well as level so that the system of credits can operate across units as well as whole qualifications. The credit based system recognises qualification size and represents a pragmatic and modest attempt at qualifications reform, and that the NQF development was the culmination of a major policy failure is now universally acknowledged. A realistic appraisal of the reasons for failure of the NQF could help other countries avoid similar mistakes.

The most obvious lesson is not to treat particular qualification design features as in some way inherently better than others and seek to apply them universally, even if this leads to a certain degree of tension with EQF developments, which also tend to promote “one best way.” The “pure” English outcomes-based NQF was inflexible and unhelpful in practice, and although the new QCF system aligns less well with the recommendations for qualifications framework development associated with the EQF, it was still possible to reference the QCF against the EQF.

## **The English Qualifications and Credit Framework**

The key point about the QCF is that it is a pragmatic attempt to improve learner mobility, transferability

and progression. The introduction of the QCF has been low key, recognising that earlier grand schemes based around a major reformation of vocational qualifications through NVQs and the NQF have been failures. Underpinning this change is the belated recognition that it is the quality of teaching, learning and skill development associated with qualifications that is key to whether they help individuals in processes of upskilling, reskilling and progression, not the imagined benefits of having qualifications of a particular type. There is now recognition that qualifications are an inadequate proxy for skill development and that qualifications reform plays a much smaller role in improving the quality of VET than more direct measures to improve the quality of teaching, learning and skill development and that for much of the past 25 years qualifications reform has actually been drawing resources away from improving the quality of the teaching, learning and the inter-relationship between the two (Nash et al. 2008).

There is also an implicit recognition that the pragmatic evolution of the Scottish VET system over the last twenty five years, whereby each development built incrementally on a previous reform, has been much more successful in practice than the more radical attempts at reform of processes of qualifications design that have failed in England (Raffe 2011). The development of the Scottish Credit and Qualifications Framework (SCQF) had been consolidated with other attempts to improve VET and the SCQF has performed a valuable, but relatively minor role in improving the communications function associated with attempts to relate and compare qualifications which went alongside other aspects of VET reform. As a consequence the SCQF, operating as a communicative framework for all levels of qualifications in Scotland, has gained widespread acceptance in practice (Raffe 2011).

The new QCF is itself not an exemplar of good practice, but there is no appetite for further major reforms in England and the removal of rigid bureaucratic limits as to what constitutes an acceptable qualification under the NQF means that it is at least an improvement on the previous system. Competence-based qualifications within the QCF now offer the accreditation of units, which are

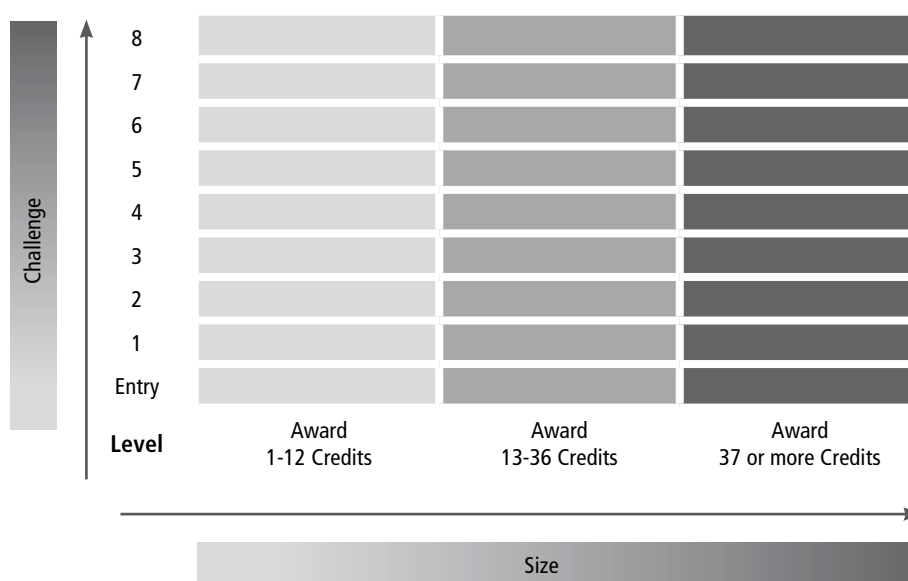
smaller steps of achievement, and QCF units and qualifications have now replaced NQF qualifications. The QCF qualifications cover the same levels of the NQF: Entry Level to Level 8, but qualifications are now split into three groups according to size – Awards, Certificates and Diplomas (QCA 2009). Qualifications in the QCF consist of a number of designated units, each of which has an approved credit value. These credit values represent the number of credits a learner will be awarded for successfully completing the unit. One credit is awarded for those learning outcomes notionally achievable in 10 hours of learning time. These changes were introduced to overcome the problems of having very different types of qualifications appear at the same level within a qualifications framework. An alternative approach may be just to exclude certain small qualifications from a NQF and keep the NQF just as a means of mapping the most important qualifications of a country in a way which could encourage progression within or across different pathways.

An Award may have between 1-12 credits, a Certificate 13-36 credits and a Diploma over 36 credits. This approach introduced a more flexible way of recognising achievement by awarding credit

for qualifications and units (small steps of learning) and allowing learners to gain qualifications at their own pace along flexible routes (along similar lines to the Scottish system) (Ofqual 2008). One major problem with the NQF had been that relying on level alone led to major inconsistencies whereby a small vocational qualification aimed at senior managers might be considered to be at the same level (7 or 8) as a post-graduate degree, although the former could be completed after perhaps 40 hours of learning and development, while the latter could extend over a number of years.

All QCF units have a credit level and credit value. The level signifies the level of challenge or difficulty, whereas the value indicates the amount of “notional” learning time required, on average, for a learner to achieve a unit. Notional learning includes activities that learners need to do while supervised in order to complete their qualification, such as classes, tutorials, practical work and assessments. In addition notional learning time includes non-supervised activities such as homework, independent research, unsupervised rehearsals and work experience. The role of learning processes is now acknowledged as key to achievement of learning outcomes. The QCF is represented in the following diagram (Fig.1).

Fig. 1: Qualifications and Credit Framework (QCF)



Source: OCN Northern Ireland (2009) (adapted by editor)

Because the QCF is a unit-based system the use of awards and certificates means that quite small amounts of learning, assembled into units in a specific area (such as Health and Safety) can be recognized and accredited either as a small award or linked with successful completion of other units to make a more substantive qualification (a certificate or diploma). For example, a Level 2 Award in Administration (Business Professional) is a bite-sized qualification that has been developed to recognise learners' understanding of key administrative functions and activities. It accredits learners' abilities to carry out a range of administrative tasks autonomously and has been designed to accredit their achievements in a modern, practical way that is relevant to the work context. It is seen as a starter qualification to which further units may be added later as a progression route to other Level 2 or Level 3 qualifications. In practice, such small qualifications have no labour market value and only become meaningful insofar as they lead to other more valued qualifications.

Underpinning any referencing process are implicit assumptions about the scope of qualifications in terms of breadth and depth and certain typical progression paths in terms of age, learning and institutions, periods of learning and volume of learning. In practice in England there are much larger differences in terms of achievement between qualifications at the same level than sometimes between qualifications at different levels. For example, a person with a level 2 NVQ may nevertheless have some problems with basic skills, especially with writing, and they may need to embark on a two year full-time learning programme in order to complete a more demanding learning programme leading to achievement of a level 2 in general education. This type of issue has now been covered in the QCF by inclusion of a volume of learning measure.

The aim of the QCF is to offer more flexibility, freedom, choice and opportunities for learners than was available under the NQF through a simple yet flexible structure that allows for the continuing development of a qualifications system that is inclusive, responsive, accessible and non-bureaucratic (Ofqual 2008). This approach acknowledged that the development of NVQs

(and the NQF) had led to a situation where many qualifications from this route within the NQF were exclusive, bureaucratic (concerned with form, specification of learning outcomes etc.), not easily understood and did not meet the needs of many employers and learners. The scepticism about the value of the NQF was also linked to the fact that over the preceding two decades many qualifications that were valued by employers and learners, were widely recognised and resulted in clear learner development and progression had remained outside the framework, largely because they did not follow the prescribed format. The QCF allows achievements to be recognised through the award of credits and qualifications and supports the accumulation and transfer of credits for purposes of progression. There is still room for debate about the value of this credit-based approach compared to offering more integrated (larger) qualifications, but what is not in doubt is that the system is more flexible than the rigid prescriptive NQF which it has replaced.

Because of the mobility of individuals within and between the United Kingdom and Ireland work has been underway over the last decade to compare qualifications across England, Scotland, Wales, Northern Ireland and the Republic of Ireland in terms of broad equivalence. This approach highlighted the necessity of comparing size, content and level of qualifications as closely as possible – crucially “level” alone appeared as an inadequate indicator. One problem for the English NQF had been that different qualifications at the same level could be very different in terms of content and duration. The QCF therefore makes allowance for differences in the breadth and depth of learning and if you have an understanding of this you can now see how a move from a higher level at an award level can still be progression to say a diploma at a lower level in terms of the learning and development of an individual. The use of a volume indicator resolves the issue of where an executive coach with a deep understanding of a very narrow part of the guidance and counselling domain (level 7 award in executive coaching obtained over say 40 hours) who wants to have a much broader understanding of the field as a whole takes a level 4 certificate in counselling (EQF level 5) that involves over 360 hours of study. Indeed an experienced executive



coach with a narrow specialist qualification at level 7 may take five years of further study before they would be qualified to act as a counsellor in a wider range of settings as say an occupational or educational psychologist. Leaving aside the issue of whether the QCF itself is now too complex for many users to understand, this example highlights four fundamental issues that can never be resolved by a simple comparison within an NQF or EQF:

- there is no reason why skills, knowledge and competence being developed and deployed in different education, training or employment settings should be at a similar level and frequently they are not;
- large integrated programmes of learning and development have a much wider range of social, educational and developmental purposes than short focused qualifications – the volume of learning being just one obvious difference;
- age, prior experience and purpose are inter-related and many people and their careers may not fit a basically linear model of moving (upwards) through levels which seems to underpin the EQF and NQFs;
- skills, knowledge and competences all change over time depending upon degree of use or non-use following qualification – even if exact equivalences could be applied at the moment of qualification, individual paths can and frequently do diverge sharply thereafter.

### **A focus on developing expertise rather than just checking competence may be a more effective driver of VET**

The English case of NVQ and then NQF development highlights the weakness of using qualifications development as an almost exclusive policy lever to try to bring about reform in VET. The need for greater attention to be played to the challenges of policy implementation and the central importance of improving the quality of teaching and learning have been clearly demonstrated. However, there is also a more fundamental philosophical question about the purposes of education and training and whether a competence-based approach to VET is the most effective driver of VET in the current labour market and, crucially in terms of aspiration, for

moving towards a more knowledge-based society. An alternative approach could involve a change in direction away from a focus upon competence development based upon a hierarchy of skills levels towards a developmental perspective on skill development across the life-course. Such a shift may be a more effective way to drive moves towards a more knowledge-based society, replacing an essentially binary conception of competence at the heart of a hierarchical system of levels (Brown 2009).

A more developmental view of skills development would imply, rather than the focus being on individuals being viewed as competent to perform current tasks at a particular level, that people could still develop in a number of ways (at a range of “levels”) in order to improve their own performance, contribute to a team or enhance the effectiveness of the organisation. From this perspective it would be helpful if national policy also stopped thinking in terms of levels as being indicative of some overall level of skills, knowledge and understanding of individuals (irrespective of context or content) (Brown 2009).

The use of reflection, review and peer assessment and support could help individuals recognise that they need to continue to develop a range of skills and have a broad conception of expertise. This approach also offers, at a societal level, some possibility of moving towards a more knowledge-based society, if coupled with a more expansive view of the nature of skills, knowledge and competence development, which could address issues of transfer of skills, knowledge and experience between different settings; how to support individuals in developing a frame of mind whereby they continually look to improve their own performance through learning and development and to support the learning and development of others; and to recognise that in any organisation a commitment to continuing growth and development of its members is strategically important (Brown 2009). This broader view could also help deal with a perennial problem: in many occupations the types of knowledge developed through education and work differ, and it is the combination and integration of these different types of knowledge that is often the major challenge (Eraut et al. 2004).

The contention is that the way to move towards a more knowledge-based society is for as many people as possible, whatever their supposed highest overall “level” of skills, knowledge and competence, to believe that they should seek to develop their skills, knowledge and competence at a number of levels (including those below as well as above their current highest “level”). Interestingly, this approach has already been adopted by many companies, as when they distinguish between employees who:

- are technically able to perform a task but have very limited practical experience of actually doing so;
- have successfully performed the task on a number of occasions;
- have performed the task many times and under a variety of conditions (i.e. experienced worker standard);
- have substantial experience but are also able to support the learning of others (i.e. can perform a coaching or mentoring role);
- could be considered “world class”, those who are able to think through and, if necessary, bring about changes in the ways that tasks are tackled.

Adopting such an approach in VET would help alignment between education and work, as crucially under this model everyone would expect individuals completing their initial vocational education and training to be still some way from “experienced worker standard”. This approach could also provide the conditions in which a commitment to continuous improvement could flourish, as not only would most people believe that they needed to develop in a number of ways (at a range of “levels”) in order to improve their performance, but also the “working coaches” so critical to supporting the learning of others would increasingly be in place (Brown 2009).

The lessons from the English case are that the development of NVQs and a “hard” National Qualifications Framework, with tight rules upon how learning outcomes, competence and levels are described, and which sought to be comprehensive by incorporating all qualifications, was that the system was inflexible and bureaucratic. However, the heart of the policy failure was that at all levels

it was so consuming of time and other resources which were drawn away from much simpler and more productive ways to improve teaching, learning, skill development and organisational performance. Again and again over the last 25 years qualification reform and movement towards an NQF has been aspirational – it should lead to increased co-ordination; smoother access, transfer and progression; better accountability and control; improved quality assurance; and supply of learning being more responsive to demand. In practice, even the most ardent supporters would say the benefits were minimal given the massive investment of resources. The English NQF has been quietly replaced, with no-one wishing to draw attention to just how ineffective it has been. Indeed a prominent politician, speaking at a EQF conference in the UK in 2010, pointed to qualifications design needing a period when it was more or less invisible – a support in the background, but no longer a process that was absorbing large amounts of resource that could be more usefully employed in supporting learning and development more directly.

In summary, in alignment with moves towards a more knowledge-based society we need to support processes of learning and development by adopting a more expansive view of the nature of skills, knowledge and competence than that enshrined in recent NQF levels. This more expansive view will pay particular attention to the need to address issues of transfer of skills, knowledge and experience between different settings; how to support individuals in developing a frame of mind whereby they continually look to improve their own performance through learning and development and to support the learning and development of others; and to recognise that in any organisation a commitment to continuing growth and development of its members is strategically important. In this view VET programmes based in Further Education (FE), including those with a substantive amount of work-related learning, should seek to help individuals move in the direction of the chosen learning outcomes but their achievement should be regarded as partial – the value of VET can probably only be properly judged some time after individuals have been applying their skills, knowledge and experience in work settings over time and ideally across a range of contexts.

## The importance of breadth and balance in VET

The argument made above is a subtle one – it is not saying that competence, learning outcomes and qualifications are not important, but rather that there are dangers in focusing on these too much, especially as drivers of education and training, which should have broader purposes. Education should be about the development of character as well as the intellect; helping individuals develop the emotional, social and intellectual capacities to participate fully in society (Brown 2010). If this leads to a sense that we need to reform aspects of our learning systems then this reform should be driven by clear purposes. Reform could be influenced by objectives such as young people feeling connected with the world, engaged with learning, valuing and respecting difference and wanting to be active citizens. Once we are clearer on educational purposes, then we can look to the pedagogic means to achieve those goals – for example, strategies might be put in place to develop greater resilience (Dweck 1999); improve informal reasoning (Perkins 1985); or help individuals develop a wider range of approaches to learning, as these are all things we do not do very well in many current approaches to education. Promoting learning and development in VET which is values driven, uses appropriate pedagogies, is technologically enhanced and underpinned by research and development looks like a balanced and sustainable approach to educational development.

The research of Jephcote and Salisbury (2007) revealed a complex picture of students' "learning journeys", the interplay between college and their wider lives and how post-compulsory education and training also contributed to the "wider benefits of learning". Students gain more benefits from college life than qualifications, important though these are. Gallacher et al. (2007) also point to the significance of social relationships in learning cultures in community-based Further Education (FE) and practices that increase students' re-engagement with learning.

Once the importance of wider purposes, including the social and affective dimension of learning, in VET is acknowledged then it is important to increase the scope for professional judgment of tutors: they need more room to decide "what works" in particular

circumstances. James and Biesta (2007) argue that, at its best, education builds on these learning cultures to encourage and challenge students to go beyond their existing dispositions and undergo personal change as well as acquiring knowledge. But such change is rarely recognised by a system in which success is measured by qualifications. Treating education as a simple mechanical process risks diminishing its transformative power, as teachers and managers need room to manoeuvre and exercise their professional judgment if they are to get the best out of the situation to benefit their students. Tutors are a key feature of any learning culture, and James and Biesta (2007) argue that the sector needs to be managed on a more flexible basis that allows room for professionals to act according to their own judgment of the local situations, within a set of national principles. These principles are that learning is about more than gaining qualifications; professionals should be able to choose systems and procedures that work together and support each other rather than undermining learning; they should also be able to decide "what works" for their own situation and not be confined to rigid procedures; there needs to be space for more localised judgment and creativity; and improvement in learning requires critical reflection at all levels; government, college, tutor and student.

VET is about exploring possibilities and offering new starts, new directions, and changes of identity as well as becoming practically competent within particular domains. A variety of teaching and learning approaches is essential. Edward et al. (2007) and Steer et al. (2007) also emphasise that there needs to be fewer constraints upon the scope of teachers to exercise their professional judgment. In an English context, significant many aspects of VET take place in FE colleges, which are entrepreneurial, and engage with issues and groups that schools and universities do not tackle, but the audit culture is distorting the priorities of people working in FE. There is also too much emphasis on assessment, at the expense of real learning. In some vocational areas, the focus on assessment overwhelms curriculum and pedagogy, and an over-emphasis on qualifications acts as an inadequate proxy for learning. This thinking centres on the completion of "units" and not on the course as a whole, nor on progression (Ecclestone, 2007).

More recently, the problems associated with targets and the audit culture have been recognised by policy makers, yet considerable changes are still needed to give tutors the intellectual space, capacity and freedom to do a wider job of educating the whole person. Nash et al. (2007) point to a limited understanding of learning by government agencies and policy makers, who often see it simply as a process of acquisition of knowledge and skills. This narrow approach does not link with knowledge of effective pedagogy nor to the idea that learners are often engaged in a process of constructing identities for learning and work. The question is whether VET is about acquiring knowledge and skills alone, or is it also about learning which changes the learner by engaging them in the process. From this perspective, VET is about learning how to become a learner and how to develop an identity across education, training and employment. It is about learners changing aspects of their lives and also the way they relate to the world.

## Conclusion

In conclusion in the context of European goals for the development of a more knowledge-based society there is a temptation to focus upon the targets (percentage of people receiving qualifications at a particular level) rather than the goal itself. The focus upon outcomes and levels may exacerbate the problem whereby people think that a qualification marks a significant end to the learning process, rather than simply being a marker for a change of focus of learning. The political commitment to goals and targets means that qualifications frameworks, specification of learning outcomes

and hierarchical levels are likely to be retained, but we can at least remember that these are proxies for the real goal and not devote too many resources to what is a second order issue. Shifting attention to the need for a developmental approach to expertise, highlighting the importance of processes of learning, the need to support the development of expansive learning environments in education, training and employment may be a more promising way forward.

Developing an NQF which maps the broad pathways and major qualifications in a country, however they are described, and offers a “loose coupling” to the EQF is probably sufficient to support the role of the EQF as a translation device to make relationships between qualifications and different national systems clearer. In that respect the lesson from the demise of a pure outcomes-based NQF in England is unequivocal: the drive for comprehensiveness and standardization in a qualifications framework consumed vast amounts of resources, was unworkable in practice and produced a whole array of qualifications which were not fit for purpose and were inferior to the qualifications they replaced when judged against the criterion of whether they supported continuing learning and development. In the field of NQFs less is more! It is a common trap to think that a more highly qualified workforce equates to a more highly skilled and more knowledgeable workforce. Indeed the focus on levels, qualifications and learning outcomes can be comforting because it gives the illusion of progress, but a much more sophisticated model of skill development and expertise is required to underpin a more meaningful movement towards a knowledge society.

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## Probleme mit Nationalen Qualifikationsrahmen in der Praxis

### England als Fallbeispiel

#### Kurzzusammenfassung

Nationale (und Europäische) Qualifikationsrahmen, welche Qualifikationen auf ähnliche Art und Weise abbilden, indem sie Lernergebnisse festlegen und ihnen dann eine eindeutige Position innerhalb eines hierarchischen Stufensystems zuschreiben, haben sich als sehr attraktiv für politische EntscheidungsträgerInnen herausgestellt. Sie bieten Aussicht auf eine Verbesserung der Transparenz zwischen Qualifikationen und der Förderung von Mobilität. Wie bei allen Umsetzungen politischer Vorgaben besteht die Feuerprobe jedoch darin, inwieweit diese Qualifikationsrahmen in der Praxis umgesetzt werden. Da momentan viele Länder die Umsetzung eines Nationalen Qualifikationsrahmens (NQR) in Betracht ziehen, ist es vielleicht aufschlussreich, sich anhand des Beispiels England die Gründe für das Versagen eines ausschließlich auf Lernergebnisse basierenden NQR vor Augen zu führen. Die Hauptlektion, die man daraus lernen kann, ist, dass Schwerpunktsetzungen auf Kompetenz und das Sichtbarmachen von Qualifikationen, Levels und Ergebnissen vom viel schwieriger zu erreichenden Ziel einer Verbesserung der Lehr- und Lernqualität ablenken können. Die Verlagerung des Augenmerks auf einen entwicklungsorientierten Ansatz, also der Entwicklung von ExpertInnenwissen, dürfte noch effektiver sein durch ein Hervorheben der Bedeutung von Lernprozessen und des Bedürfnisses, die Entwicklung einer expansiven Lernumgebung in Bildung, Ausbildung und Erwerbstätigkeit zu unterstützen. Anzuerkennen, dass die Entwicklung eines NQR in diesem Prozess eine eingeschränkte Rolle spielt, und dass eine „grobe Orientierung“ hin zur Gleichwertigkeit oft ausreichend sein wird bei der Aufzeichnung potentieller Fortschrittsverläufe, mag ein brauchbarer Ansatzpunkt für diesen Verlagerungstrend sein.

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