

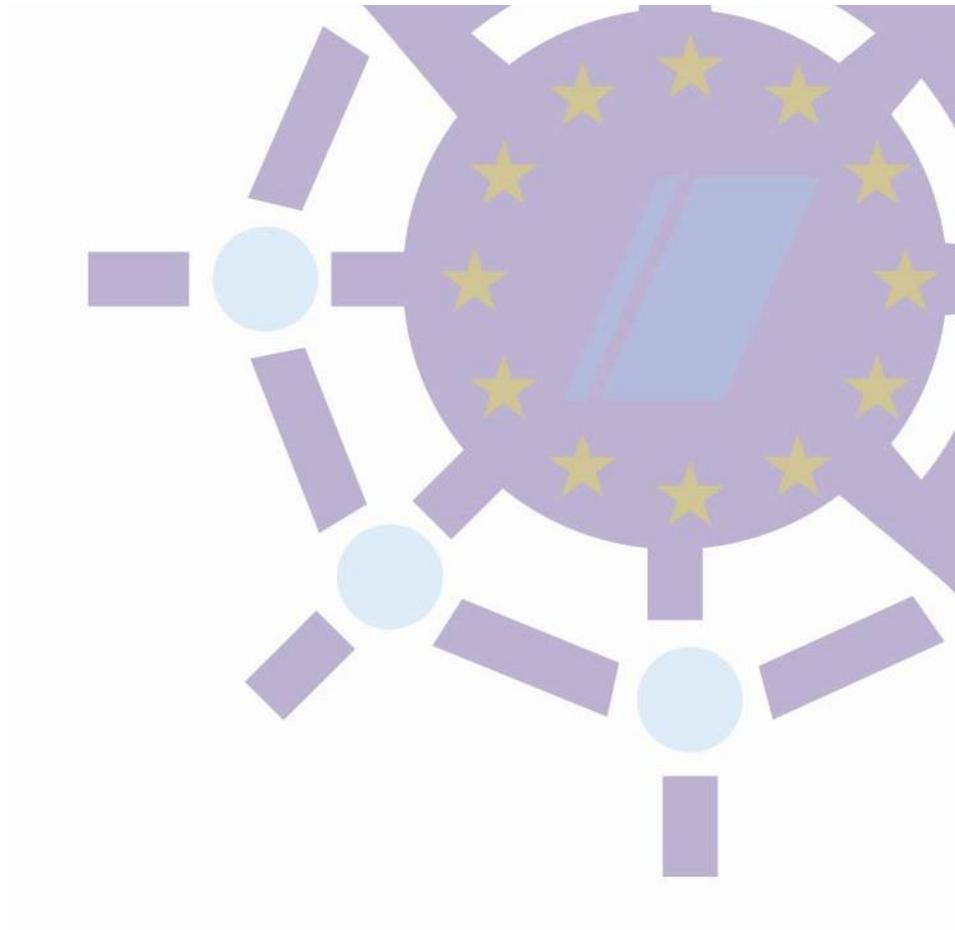


Basic elements and key recommendations on the adoption of the SQFCGF at national level

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Introduction

This document is drafted in the framework of the European Coast Guard Functions Academy Network - ECGFA Net and relates to the outputs and working papers provided in the previous steps of the Project, and specifically to the recommendations on the adoption of the Sectorial Qualifications Framework for Coast Guard Functions (SQFCGF) developed in the framework of Work Package 4 of EGFA NET III. The aim of this paper is to provide guidance to managing authorities and the apex body at national level on how to develop or reference to a National Qualification Framework in accordance with the SQFCGF established in this project.

This working paper is based on the lessons learned in the past decade from the adoption of National Qualifications Frameworks and Sectorial Qualifications Frameworks (SQFs) both at European and international level, including their referencing to the European Qualification Framework (EQF). To this end, the report starts with a brief review on the available studies and literature developed by Cedefop and the ETF.

The present report is drafted in continuity and combination with the paper on “Basic elements, key recommendations and methodology” (February 2016), the “Working Paper for adoption and management of the Framework” (draft February, 2019), as well as to the (draft) SQFCGF itself. Reference is made to those documents which provide a complete overview on how the SQFCGF is intended to function in the next years.

1. The implication of the functioning of the SQFCGF as meta-framework

The SQFCGF is a meta-framework. It is intended to allow qualifications and learning for skills useful for performing specific coast guard functions and activities in different countries to be compared easily, and support enhanced mobility and a better cooperation. This is achieved by propagating the use of learning outcomes for each function, in order to make them more transparent and easier to understand and compare.

Before analysing the links between the international SQFs and the NQF, it is important to affirm the meaning of the terms ‘qualification’ and ‘recognition’.

For the purpose of developing the SQFCGF, **qualifications** have been defined as *“a package of standards or units judged to be worthy of formal recognition in a certificate”*¹, where the ‘formal’ acknowledgment implies a proper decision by a competent body/authority. The Council Recommendation on the EQF² accordingly defines qualifications as *“the formal outcome of an assessment and validation process by a competent authority and typically take the form of documents such as certificates or diplomas”*.

At national level the ‘**recognition**’ or acknowledgment finds reference in a body of regulation; similarly, at international level the ‘recognition’ is related to the transparency or currency (e.g. real

¹ EGFA NET II, WP4 “Basic elements, key recommendations and methodology”, February 2016, <http://ecgff-trainingportal.eu/uploads/store/librarydoc/33/file/004a59be47.pdf>

² Council Recommendation of 22 May 2017 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 (2017/C 189/03)

value /application) and portability of qualifications (Leney, 2009³) issued by another country and has to find reference in national regulation as well.

However, given that the SQFCGF is a meta-framework and a translation tool, qualifications are currently not directly referenced to the SQFCGF. They are instead referenced to the national qualification systems, where their level and value abroad can be understood by reference to the four levels of the SQFCGF, which at the same time also refers to the four upper levels of the EQF. Whilst this implies that SQFCGF is not directly applicable at national level, referencing to the NQF serves to make the SQFCGF a more concrete and valid tool. The more qualifications that are conferred at national level and align at the same level in the NQF and the SQFCGF, it further assures the validity of the SQF across Coast Guard Function (CGF) training.

Moreover, as pointed out in an ETF study in 2011⁴, it is noted that *“qualifications frameworks in practice are usually more than a grid of qualifications levels, instead they typically have wider ‘political’ and social aims and dimensions, such as seeking to integrate existing systems of education and training more closely.”* This has been confirmed more recently by Cedefop pointing out that the political dimension of qualification framework is determinant for the success of the qualification framework itself *“the stronger its [framework] political mandate and its integration into mainstream policy processes, the greater its potential as a policy steering and reform tool”*⁵.

Hence, the importance of the SQFCGF has to be recognized in the broader scope of the benefits to CGSs even if it will not achieve a formal link at the national qualification framework in the short term.

The aim of this report is to provide some recommendations on how to establish this process, drawing on lessons learned and guidelines developed at European and international level, starting with the referencing of the SQF/NQF to the EQF.

2. The referencing of the SQF/NQF to the EQF

The EQF was adopted in 2008⁶ as non-binding tool, consistent with the principle of subsidiarity. It is an example of ‘soft’ *acquis* of European law. The EQF consists of four core elements:

- vision and objectives;
- a set of common descriptors, defined in terms of learning outcomes, and located in a structure of eight levels;
- definitions of key concepts;
- a set of common principles and procedures on quality assurance.

Member states are asked to reference the levels of their qualifications systems or frameworks in a

³ Leney, T., *Qualifications that Count: strengthening the recognition of qualifications in the Mediterranean region – MEDA-ETE Thematic Studies*, Office for Official Publications of the European Communities, Luxembourg, 2009

⁴ ETF, *Transnational Qualifications Frameworks*, J. Keevy, B. Chakroun, A. Deij, Publications Office of the European Union, Luxembourg, 2011

⁵ CEDEFOP, *Briefing Note, Qualifications Frameworks in Europe 2017 Developments*, February 2018 | ISSN 1831-2411

⁶ Recommendation of the European Parliament and of the Council of the European Union of 23 April 2008 (Official Journal of the European Union, 2008/C 111)

transparent way to the EQF, as well as to use learning outcomes in describing qualifications and to designate national coordination points to oversee the relationship between their respective national systems and the EQF, in particular to ensure the referencing of the national system or framework to the EQF.

The EQF is defined by eight learning outcomes-based levels. Accompanying level descriptors show how expectations of knowledge, skills, autonomy and responsibility increase as learners progress from level 1 to level 8. These levels, along with the descriptors, function as a translation grid and make it possible to compare qualifications from different countries and institutions.

Qualifications are not directly referenced to the EQF. They are instead referenced to NQFs and SQFs that have been validated at the national level. The reference to the EQF levels in national certificates and diplomas and their inclusion in NQFs⁷ strongly increases the transparency and mutual trust among EU countries.

Each country wanting to relate its national qualifications levels to the EQF has to prepare a detailed referencing report that follows the 10 EQF referencing (shown below) of the revised 2017 EQF Recommendation⁸. These criteria also help with the structuring of referencing reports, which should include input and written statements from national quality assurance bodies and international experts⁹.

EQF referencing criteria

1. The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process are clearly determined and published by the competent authorities.
2. There is a clear and demonstrable link between the qualifications levels in the NQF or systems and the level descriptors of the EQF.
3. The NQFs or systems and their qualifications are based on the principle and objective of learning outcomes and are related to arrangements for the validation of non- formal and informal learning and, where appropriate, to credit systems.
4. The procedures for inclusion of qualifications in the NQF, or for describing the place of qualifications in the national qualification system, are transparent.
5. The national quality assurance system(s) for education and training refer(s) to the NQFs or systems and are consistent with the principles on quality assurance as specified in Annex IV to the EQF Recommendation.
6. The referencing process shall include a stated agreement from the relevant quality assurance bodies that the referencing report is consistent with the relevant national quality assurance arrangements, provisions and practice.
7. The referencing process shall involve international experts and the referencing reports shall contain the written statements of at least two international experts from two different countries on the referencing process.
8. The competent authority or authorities shall certify the referencing of the NQFs or systems with the EQF.

⁷ EU, The European Qualifications Framework: supporting learning, work and cross-border mobility, Publications Office of the European Union, Luxembourg 2018

⁸ COUNCIL RECOMMENDATION of 22 May 2017 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 (2017/C 189/03)

⁹ As reported by CEDEFOP (www.cedefop.europa.eu/en/events-and-projects/projects/european-qualifications-framework-efqf) , by April 2018, 35 countries had formally linked ('referenced') their national qualifications frameworks to the EQF: Austria, Belgium (Flanders and Wallonia), Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Finland, the Former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Kosovo, Latvia, Lichtenstein, Lithuania, Luxembourg, Malta, Montenegro, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Sweden, Switzerland, Turkey and the United Kingdom (England, Scotland and Wales). The remaining countries are expected to follow in 2018, which means that the first stage of EQF referencing is nearly finished.

One comprehensive report, setting out the referencing and the evidence supporting it, shall be published by the competent authorities, including the EQF National Coordination Points, and shall address each of the criteria separately. The same report can be used for self-certification to the Qualifications Framework of the European Higher Education Area, in accordance with the self-certification criteria of the latter.

9. Within six months of having referenced or updated the referencing report, Member States and other participating countries shall publish the referencing report and provide relevant information for comparison purposes on the relevant European portal.
10. Further to the referencing process, all newly issued documents related to qualifications that are part of the NQF or systems (e.g. certificates, diplomas, certificate/diploma supplements) and/or qualification registers issued by the competent authorities should contain a clear reference, by way of NQFs or systems, to the appropriate EQF level.

The referencing criteria aim to ensure that NQFs are referenced to the EQF in a coherent and transparent way.

According to a review conducted by Cedefop in 2017, a total of 39 European countries are currently developing and implementing NQFs, including 35 countries that have formally adopted their NQFs.

By the end of 2017, 34 countries had referenced their NQFs to the EQF; the remaining countries are expected to follow in the near future. Further, 29 countries have linked their NQFs to the framework for qualifications in the European higher education area (QF-EHEA).

A total of 35 countries are working towards comprehensive frameworks covering all types and levels of qualifications awarded through formal education and training. In some cases¹⁰, qualifications awarded outside formal education and training are also included.

The majority of the existing NQFs reached operational status as they are integrated into the national education and training systems and are fully based on learning outcomes. The NQFs in Europe are primarily being designed and used as descriptive tools in order to make national qualifications systems more transparent, rather than being used to regulate the design and award of qualifications. At the same time, as the NQF evolves in practice, they are increasingly triggering reform on education, training, including recognition of non-formal education and work developed competences.

The adoption of a Sectoral, National, or International Qualifications Framework implies the existence of a governance and management structure¹¹ which assures the proper functioning of the QF at national level.

The management of the EQF is ensured at European Union level by the EQF Advisory Group: a group chaired by the European Commission and composed of national representatives (two per Member State and for each of the other 11 participating countries), labour market actors, education and training and civil society representatives, as well as the Council of Europe.

The Advisory Group discusses each referencing report in detail and provides feedback to the presenting countries following a peer review process. In addition to the Advisory Group, there are other two key implementation structures: i) the National Coordination Points (NCPs), responsible

¹⁰ Belgium (fl), Estonia, France, Ireland, the Netherlands, Poland, Slovenia, Slovakia, Sweden and the UK 

¹¹ For more info on this issue, please refer to the "Working paper on adoption and management of SQFCGF for further reference"

for more practical issues and ensure that country-specific issues are raised, as well as the application of EQF recommendations and principles are properly applied in the NQF; ii) the Support/Working Groups providing suggestions on specific themes, such as quality assurance, sector qualifications.

Finally, two sectoral European Agencies (Cedefop and ETF) support the implementation of the EQF and comparison at both European and international level.

3. Referencing criteria

Reports available since 2010¹² show that there is no single recipe for successful development of transnational qualification frameworks and indeed diverse translational qualification frameworks prove to be effective. Also different NQFs models coexist with transnational qualification frameworks, including the EQF. In addition, evidence¹³ suggests that the development of a transnational framework does not depend on the complete implementation of the NQFs in countries that are part of the transnational sector, although the presence of functioning NQFs may have a significant positive impact.

Indeed, the link between the transnational SQF and the NQF is described as a two-way learning process, where the interplay between them is valuable in both directions as it helps fill in the gaps, clarify level descriptors and increase transparency and mobility.

One of the most important dimensions of the relationship between different qualifications frameworks is referencing, which concretely shows the correlation between the two frameworks in terms of levels, credits and (whenever applicable) qualifications types. Without the referencing, the risk of the SQF is to remain a theoretical (though still useful) exercise. It is by means of the referencing that the strengths and weaknesses of the frameworks become more obvious and trust between countries and authorities is reinforced.

ETF¹⁴ identified the following broad categories of referencing:

- *upward referencing*: between an NQF and a transnational qualifications framework, and also between a sectoral qualifications framework and an NQF or wider transnational qualifications framework;
- *peer referencing*: between two NQFs, and potentially also between two transnational qualifications frameworks, or even between different sectoral qualifications frameworks;
- *downward referencing*: referencing from transnational qualifications frameworks to NQFs and even from NQFs to sectoral frameworks – this is possible but will in all likelihood remain limited.

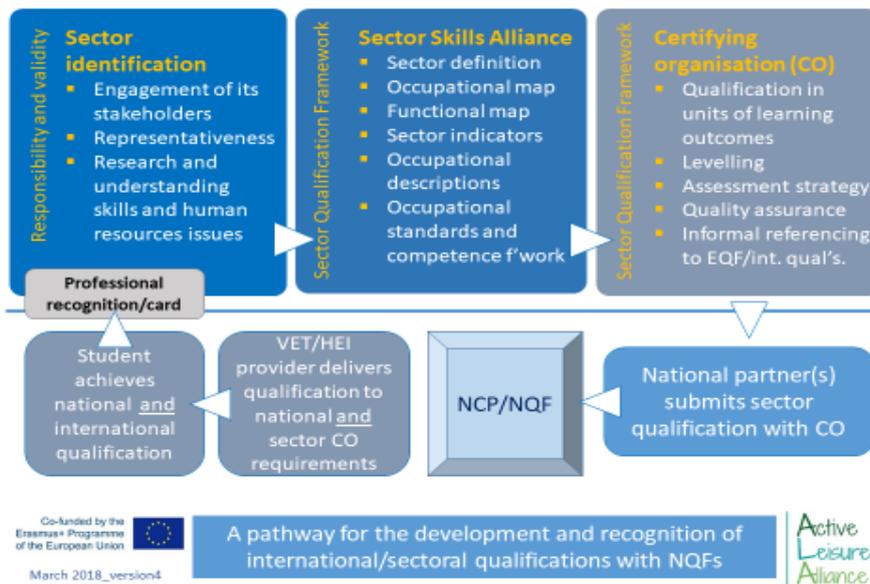
So far, the (almost) only referencing adopted is the **upward referencing**, which is also the one proposed for the link between the EQF and the SQF. This implies that the SQFCGF remains a separate framework compared to the EQF, as it is the case of the EHEA-QF, while national authorities shall find the interlink between their NQF or national SQF (or more in general their qualification systems even if not –yet- embedded into a NQF / national SQF) and the SQFCGF.

¹² ETF publications: <https://www.etf.europa.eu/en/publications-and-resources/publications/reports>

¹³ National qualifications framework developments in Europe 2017, Cedefop

¹⁴ Transnational Qualifications Frameworks, ETF, 2011

One example of proposed upward approach in adopting European Sectoral qualification standard, not linked to EQF, is the one developed within the Active Leisure Alliance¹⁵.



The pathway shows strict **separation of responsibilities** between the standards-setting body, the **overall quality assurance through the Certification Organisation and the delivery by training** companies and higher education institutes. This approach fully respects the national positions of the NQFs and, for example, any applied or required national schemes of quality assurance or licensing of VET bodies.

Even if the upward option is the most used and proposed, when considering the adoption at national level of the SQFCGF, the **peer referencing** can also be considered, and more specifically the direct referencing between the SQFCGF and the EQF.

Potential options for linking the transnational sectoral qualifications frameworks to the EQF are also explored for the case of International Sectoral Qualification framework, as already presented in the Annexes of the Working Paper of the adoption and management of the SQFCGF¹⁶. However, these options can also be seen as a learning process, starting with more informal link to achieve a full referencing once the SQFCGF reaches a more mature development stage.

These additional options are:

- Organisations issuing qualification at national level making a direct link to the EQF themselves or eventually including self-declared linkage based on a common set of criteria but no verification process.
- Strengthening indirect linkage to EQF by creating an agreement on requirements for SQFCGF to be included into a NQF or improve transparency on the national procedures and requirements being used to link SQFCGF to the NQF. Strengthening indirect linkage to the EQF should improve the process of referencing the European sectoral initiatives in the field of qualifications to NQFs, so that in turn these would give coherent access to linkages with the

¹⁵ <http://www.active-leisure-alliance.eu/projects/active-leisure-eqf>

¹⁶ Study on International Sectoral Qualifications Frameworks and Systems with EQF, Publications Office of the European Union, 2016

EQF. However, the benefits of this option are only likely to be realised if a large number of countries have processes for linking initiatives to their NQFs.

- Developing a process for direct linkage at level of SQFCGF to the EQF. This option is seen as the easiest method of linkage and less time-consuming and burdensome than to go through the NQFs. It is also expected that the value of SQFCGF would be strengthened and they would be better recognised at national level once they had a formal relationship to the EQF. Linkage to the EQF would then enable faster and less complicated inclusion in the NQFs.

The European Union study on international sectoral qualifications frameworks¹⁷, in order to create links with EQF/NQF/SQF, recommend the following:

- Examine in greater depth the feasibility of creating a direct link between EQF and the SQF. This would have implications for the EQF referencing process.
- Examine in depth the position of Member States and in particular the type of objections put forward by the national authorities and focus on initiatives which have enough “critical mass” in terms of people/organisations involved and priorities for the EQF development.
- In case it proves unfeasible to create a procedure for an official direct linkage with EQF, consider the possibility of giving organisations guidance on how to improve the quality of self-declared linkages.
- Search for cooperation with EQF advisory board and/or its technical structures in order to speed up the process or finding more viable options.

4. Recommendations and lessons learned on promoting the adoption of SQFCGF at national level

Regardless of the model or option chosen to link the SQFCGF to the NQFs, including not linking the SQFCGF to the NQFs at all, a number of other recommendations for the adoption, functioning and management of the SQFCGF at national level can be provided and are summarised below¹⁸.

4.1 The role of the apex body

Amongst the main functions of the apex body of the SQFCGF, one relates to the support provided to national authorities to implement the SQFCGF at national level. As commented above, this can swing from a concrete revision / approval of the referencing system or to a more general and loose support concerning the level descriptors and their significance for performing coast guard functions and being recognized at international/European level.

Hence, when adopting the SQFCGF, the role of its apex body (if any) concerning the support to national authorities shall be identified, as well as the related tools to perform such a role.

In addition, the apex body has a fundamental role in building and maintaining mutual trust between institutions and systems, mainly based on the control over quality, as precondition for cooperation across subsystems and borders.

¹⁷ Study on International Sectoral Qualifications Frameworks and Systems, European Union 2016.

¹⁸ Reference is also made to the recommendations included in Unesco (2017). Global inventory of national and regional qualifications frameworks. <http://www.cedefop.europa.eu/sl/publications-and-resources/publications/2222>

Finally, the apex body can support the monitoring and evaluation of SQFCGF /NQF added value and impact: this should be planned from the beginning to inform policy developments and allow stakeholders to revisit, revise and change.

4.2 Political commitment / deadline for adoption

Political commitment is indicated as a key factor in all qualification frameworks/contexts. SQFs/NQFs need to be backed by politicians at national and regional levels who can secure institutional stability, appropriate funding and the necessary human resources.

While there is no a concrete need for a formal adoption/reaction, being the SQFCGF a voluntary meta-framework limited to a 'soft law' dimension, agreeing a feasible timing for the translation of the SQFCGF at national level can proxy the robustness of the political commitment and serve for a better governance of the SQFCGF itself. For example, only countries / authorities formally showing interest in applying the SQFCGF might be involved with the functioning of the SQFCGF, while other countries / authorities can remain with a more general stakeholder role.

4.3 Communication and stakeholders' engagement

A clear vision of the SQFCGF' usefulness for different beneficiaries is fundamental. Communication efforts need to be vigorous and supported organisational and at European level, where a type of 'branding strategy' can be used to raise end-user awareness.

Communication is a goal itself and is also the tool for continuous stakeholder engagement and cooperation, bridging education and employment and including clear attribution of roles.

The stakeholders' engagement can take the form of partnerships of experts, researchers, policy-makers and practitioners to obtain a better picture of the SQFCGF implications, the relationship between SQFCGF and NQFs, implication of NQFs on access, mobility, pathways, and skills formation as well as changes in the policy and labour market in coast guard functions.

4.4 Peer learning

Structured peer learning, knowledge-sharing and capacity development has been noted as an important dimension when adopting the NQF/SQF. Indeed, the peer review (through the Advisory Body) in the EQF is the pillar of the referencing process. It includes the national coordination points, working groups, as well as the Cedefop virtual communities¹⁹.

4.5 Credit transfer

Credit transfer mechanisms, such as ECVET within the EU, are recognised as playing an important role in supporting the development of transnational qualifications frameworks. Credit transfer mechanisms form an integral part of qualifications frameworks. NQFs developed without credit accumulation and transfer mechanisms are increasingly taking note of this point²⁰. Hence the credit transfer mechanism can be considered as a part of developing the SQFCGF.

¹⁹ <http://www.cedefop.europa.eu/en/events-and-projects/networks/european-community-learning-providers>

²⁰ <http://www.cedefop.europa.eu/en/publications-and-resources/publications/6108>

4.6 Inclusion of non-formal and informal learning

Given the specific objectives of the SQFCGF, a systematic effort to include reference points for non-formal and informal learning is fundamental to the sector, regardless of national decisions to reflect all types of learning in NQFs.

4.7 The avoidance of unnecessary bureaucracy

The avoidance of unnecessary additional bureaucracy that may arise with the adding a further meta-framework is well recognised. Having in mind the state of development of the NQFs, the EQF, as well as other sectoral QFs, the set of rules and guidelines related to the adoption of SQFCGF and the link to the NQFs should be as streamlined as possible. At the same time, the (common) mistake to see the SQFCGF as a purely technical exercise should also be avoided. Hence, while permitting a loose adoption and modular approach, the practical implications of the SQFCGF should be achieved and stressed from the beginning.

5. What to do next for implementing the SQFCGF at national level

Drawing on the experience, guidelines and lessons learned presented in the previous paragraphs, the procedure of developing (sectoral) national qualifications frameworks linked to the SQFCGF may be summarized in the following 10 main steps:

1. **Decision to start** taken by a national body. The national body competent for the coast guard function or the national body competent for the NQF (if any) shall take a formal decision to initiate the adoption of the sectoral qualification framework and identify the main institution in charge of the development process.
2. **Setting the agenda.** A concrete set of objectives, both in the short and in the long run should be defined. They shall mention, at least, the purpose of the SQF/NQF, the institutions involved, the legal implications, the tentative timing, etc.
3. **Organising the process.** A more operational description on how the development process will work, including, *inter alia*, the main stakeholders involved in the process and their role; the establishment of ad hoc committee(s)/working group(s) or the formal engagement of existing committee(s) / organisations; the consultation process (if any).
4. **Design Profile.** For each qualification released at national level, it should be identified: level structure, level descriptors (learning outcomes), credit ranges. While it is not compulsory, it is highly recommended to refer to level structures and descriptors of the SQFCGF in order to have a better comparability. Alternatively, if different level structures and descriptors are used, translating tables should be provided in order to create links to the SQFCGF.
5. **Consultation.** National discussion and a formal venue for engagement of national relevant stakeholders should be found in order to agree on the SQF/NQF design/ architecture.
6. **Formal approval** (adoption) of the SQF/NQF according to national legislative framework by relevant Minister/Government.
7. **Administrative set-up in accordance with the SQF/NQF approved architecture. This includes the** division of tasks of implementation between national authorities, quality assurance agency and other relevant bodies.
8. **Implementation at institutional/programme level.** Provide guidelines / support for the reformulation of individual training programmes by the training providers consistently with

the learning outcomes based approach.

9. **Inclusion of qualifications in the NQF.** Link the accreditation system to the qualifications included in the SQF/NQF.
10. **Self-certification of compatibility or any other linking/referencing system** with the SQFCGF, following the guidelines provided by the SQFCGF apex body (if any)

Almost all of the above-mentioned steps shall be considered as iterative, i.e. regular revisions and updating of the process - SQF/NQF content shall be performed in order to make the SQF/NQF a living and useful tool.