

Austrian EQF Referencing Report – Supplementary Information

Reaction to the feedback provided at the 15th Meeting of the EQF Advisory Group, 11th of June 2012
as summarized by CEDEFOP's final note on the Austrian Referencing Report

Vienna, October 2012

Following from the feedback that has previously been provided on the above occasions by the members of the EQF Advisory Group and the European Commission, Austria preserves to react to these comments. The following paper responds to the main points put forward on the 11th of June 2012, and aims to clarify open questions as well as to indicate how Austria will appreciate the provided feedback in its further national implementation. The paper is to be understood as a supplement to the Austrian EQF Referencing Report, which will remain in its presented form until further notice.

Generally, it was noted that the Austrian EQF Referencing Report constitutes a comprehensive and clear depiction of the Austrian qualifications system. The established links between NQF and EQF levels appeared transparent and comprehensible and national descriptors were perceived as a neat contextualization of the EQF descriptors. Following a strong bottom-up and evidence-based approach involving all relevant stakeholders the work conducted since 2006 was acknowledged as valuable in ensuring public trust in the Austrian National Qualifications Framework.

While this positive feedback was appreciated, a number of more critical comments were brought forward. Their subsequent consideration in national implementation shall be addressed in the following.

1. The Austrian NQF as a comprehensive framework

Answering the raised question about the degree of comprehensiveness of the Austrian NQF requires an outline of four Austrian key principles and issues including the working structure of the three corridors, the adopted Y-structure, the long-term inclusion of general education, and methods of validation of non-formal and informal learning.

While the Austrian qualifications landscape can be characterized as highly fragmented and responsibilities as distributed among a large number of stakeholders and education providers the Austrian NQF was designed as a comprehensive framework, encompassing all types and levels of qualifications the formal and non-formal sector, and appreciating the results of informal learning. The anticipated procedural complexity of developing and implementing a comprehensive NQF was reduced by subdividing the overall **process** structure into three 'corridors'.

The uncertainty and misunderstanding of the concept of three corridors articulated by various members of the EQF Advisory Group and the European Commission is mainly to be seen as a result of dissimilar definitions of formal, non-formal, and informal learning at national and European level (see Austrian EQF Referencing Report, Chapter 3.3., p. 49).

According to national definitions, the three corridors are not to be understood as separate, impermeable educational strands, yet as parallel and communicating processes, overseen and closely coordinated by the NQF steering committee. Work in the three corridors does not necessarily progress at the same pace, yet the corridors correspond and communicate closely, and mutually seize results and advances to a maximum.

Within the context of corridor 1¹, one of the main issues to be resolved concerns the long-term inclusion of general education and the respective school leaving certificate. General education has not been included into the 'reference qualifications' as consensus regarding level allocation could previously not be found. However, a political decision on this issue has not yet been made and in the pursuit of a long-term inclusion of general education relevant stakeholders will recommence their dialogue and cooperate in finding a method to resolve this issue.

The comprehensiveness and inclusiveness of the Austrian NQF is further documented by the politically adopted Y-structure, which generally opens up the levels 6 to 8 for qualifications from VET alongside those from higher education. This bears particular importance for the Austrian NQF as numerous high level qualifications are offered exclusively outside the Bologna system.

In the light of current developments at European level and the pressing importance of the issue of validation, Austria currently pushes forward the work on developing validation procedures ambitiously and systematically (corridor 2²). Responsibilities and methodologies are being defined and mark an important stepping stone towards an inclusive NQF.

2. Allocation procedure and national responsibilities

As outlined in the Austrian Referencing Report, the allocation procedures and criteria have been tested extensively in a pilot phase (Simulationsphase) in early 2011. This testing period has shown that the planned allocation procedure did not prove feasible in yielding sustainable results. Currently a modified model is being reviewed, and has been put forward for political decision, which is expected in the forthcoming months. This model would clarify and define the exact method and procedure as well as all competent bodies involved, details on their role and responsibilities.

¹ Corridor 1 describes the formal education system, including all formal qualifications regulated by law.

² Corridor 2 captures all non-formal qualifications, which, unlike non-formal learning, are formalized but are lacking a legal basis (e.g. adult education).

3. The principle of voluntariness

Qualifications will be allocated based on a voluntary application put forward by the respective education providers. In the formal sector these would be the responsible ministries, in the non-formal sectors the providers would be adult education institutions mediated through the QVS³ which are currently being modelled. All applications will be received and formally reviewed by the National Coordination point, who will play a key role in future allocation procedures.

The adoption of the concept of voluntariness in allocating qualifications to NQF levels was based on a conscious decision. The Austrian NQF is understood as a framework serving the mere purpose of orientation and communication. It will not be introduced as a regulating instrument. An obligatory top down allocation of all qualifications would not be in line with this key principle.

From the very beginning of NQF developments a lot of effort and strategic work was devoted to get on board all relevant stakeholders and to create a strong sense of ownership (e.g. steering committee, information and communication work, road shows, national coordination point...). It can hence be anticipated that the essential education providers will have a significant interest in allocating their qualifications to the NQF. The added value of such an allocation is well understood and appreciated.

4. Involvement of stakeholders and methods of finding consensus

Stakeholders were involved mainly through nomination for the national steering committee (i.e. ministries, social partners, Länder). All important decisions, document drafts such as the manual and application form, the referencing report, models for allocation procedures, allocation of qualifications during pilot stage,... , were presented to this group in frequent meetings, discussed in an open and purposeful manner, modified where appropriate, and finally adopted by the steering committee. This way the steering committee, representing all key players in the Austrian qualifications landscape, was involved in all essential decision making processes.

5. Technical vs. social approach

When conducting semantic analysis and technical matching of NQF, EQF and learning outcome descriptors and making use of the best fit principle, Austria does not ignore that social aspects such as direct entry into the labour market, self-employment and unemployment rates, positions held, average income, etc... do impact on the status and level of a qualification. A lot of scientific effort has been put into examining the impact of these factors and has yielded supportive results (zB. Tritscher-Archan, S., 2008, NQR in der Praxis). The Austrian approach combines a pure scientific and analytical approach with strong and consistent involvement of stakeholders who, as representatives of the

³ Qualifikationsverantwortliche Stellen (QVS) are mediating bodies that will be established and organized sectorally to collect and process applications from private education providers prior to formal assessment by the National Coordination Point.

wider society, are given a voice through the national steering committee, a platform where they can advocate their interests and hence serve as a counterbalance to purely technical analyses.

6. International experts' feedback and inputs

Three international experts were presented with a draft version of the Austrian Referencing Report before being invited to Vienna for a one day expert meeting and discussion. The meeting took place on the 11th of January 2012 and involved national stakeholders presenting the Austrian education system and the state of play of the Referencing Report to international experts Mile Dzejalja (CRO), Jos Noesen (LUX), and Achim Hopbach (D), who then were invited to comment and discuss. Based on their feedback, the Referencing Report was reviewed and modified before it was finalised and submitted to the EQF Advisory Group. Some examples of how this step was performed shall be outlined in the following:

As stated previously, the concept of the three corridors was already discussed extensively with international experts, who uttered their concerns regarding clarity and transparency of this working structure. Based on their feedback, respective passages of the report were sharpened to avoid future misunderstandings and overvaluation of the three corridors as more than a mere working structure. Scope and coordination, as well as meaning for the overall process were explained.

International experts suggested elaborating on the links between NQF and EQF descriptors. National descriptors were hence made explicit as contextualised descriptors, which alongside EQF descriptors and reference qualifications form the basis for allocation of qualifications.

The previous structure of the EQF Referencing Report led international experts to raise their concern about a potential misperception of the Higher Education sector not being an integral part of NQF developments. This resulted from the fact that two authors were contributing to provide Bologna and Non-Bologna text passages, which were subsequently better integrated. The report in its final version provides a good depiction of the close cooperation of the two ministries in developing a comprehensive NQF that encompasses both Bologna and Non-Bologna qualifications.

The draft version of the Austrian EQF Referencing Report did not make apparent enough the role of the NQF in the promotion of Lifelong Learning. The report was subsequently modified to set out LLL as one of the key strategic aims of the Austrian NQF and the importance of the NQF in national LLL strategies.

Finally experts' feedback led to expansion and greater detailing of those sections concerned with issues of quality assurance as well as a more comprehensible linkage of national quality assurance principles to the European Qualifications Framework.

The feedback received during the 15th meeting of the EQF Advisory Group, 11th of June in Brussels, leads to the assumption that the feedback of the international experts was incorporated successfully.

7. Is the Austrian Referencing Report implemented?

The implementation of the Austrian NQF can be described as on-going. The presentation of the Austrian Referencing Report can be understood as marking the end of the development of Austrian level descriptors and their linking to the EQF. Essential work preparing implementation through drafting a suitable model for allocation, setting the general conditions, clarifying responsibilities, defining the scope of the framework, informing the wider public and involving stakeholders will facilitate further implementation and allocation considerably.

Austria would still like to underline the point raised by Poland, namely the idea of implementing 'minimal standards of implementation', that is to define when exactly a framework can be considered implemented. Does this mean that all qualifications (or a minimal number of qualifications) have to be allocated? Does it imply a legal foundation? Which significance is held by the presentation of the referencing reports in the EQF AG for the overall implementation of an NQF? Minimal standards of implementation would make national contexts and progress more understandable at European level.

8. Legal status of the Austrian NQF

It is envisaged to create a legal basis for the Austrian NQF, which should clarify responsibilities and allocation procedures. A draft model is currently being reviewed; a political decision is expected in the forthcoming months.

In conclusion...

... Austria would like to thank all commenting countries and colleagues for their in-depth and thoughtful feedback and would like to stress that feedback will constitute an important basis for further national implementation.