

## COMMENTARY ON 'PROPOSAL FOR A SERBIAN NATIONAL QUALIFICATIONS FRAMEWORK

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This *Commentary* explains the rationale for various points in the *Proposal*, and in some cases presents alternatives. Paragraph numbers refer to those in the *Proposal*.

- 1 The definition of 'qualification' given in the *Green Paper* is similar to the definition in the EQF (p, 12) "A qualification is achieved when a competent body determines that an individual's learning has reached a specified standard of knowledge, skills and wider competences. The standard of learning outcomes is confirmed by means of an assessment process or the successful completion of a course of study. .. A qualification confers official recognition of value in the labour market and in further education and training." It should be noted that the *White Paper* and EQF definitions are not confined to the achievement of a particular duration or level of secondary schooling, which is the common usage of the term 'qualification' in some countries. It should also be noted that both definitions regard a qualification as referring to the 'formal admission' or 'determination' of the achievement of skills, knowledge and competence, rather than the skills, knowledge and competence themselves, which is the usage in some countries (e.g. Germany). This usage appears sometimes in Serbia, for example *The Green Paper* (p, 31) states that "certification is the formal and official admission of vocational competencies (qualifications), or the successful achievement of the defined learning outcomes."
- 8 The reference to 'non-formal' learning is deliberate. There is a generally accepted distinction between 'non-formal' learning (meaning education and training outside the state recognized educational institutions) and 'informal' learning which the OECD\* has defined as "Learning resulting from daily work-related, family or leisure activities. It is not organised or structured (in terms of objectives, time or learning support)." Many countries have aspired to, and a few have implemented, systems for the assessment and certification of informal learning. The English NVQ system allows this, and this feature was actively promoted in the *Access to Assessment* initiative of the early 1990s, which funded centres which would provide *Assessment of Prior Learning (APL)*. These had some success while funding was available, but usage declined when it was withdrawn. The evaluations showed that demand from adults was very limited, and that most assessment centres identified distinct gaps in competence which needed to be filled; it was generally far more cost-effective to offer the full course leading to a qualification than to design an individual programme to fill each individual's particular gaps. The French *Validation des Acquis de l'Expérience* is a similar approach, though its popularity and its practical labour market benefits remain to be proven. In Denmark, there are procedures for adults to claim exemption, based on their prior experience, from parts of the 'main vocational education' (apprenticeship) system, though these are complex and negotiated on an individual basis; they do not exempt adults from taking the final exam (*Svendepøve*). *Despotović* (2005, p 11) proposes a

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\* Report on the OECD activity, *The Role of National Qualifications Systems in Promoting Lifelong Learning* (forthcoming).

system of “validation and certification of previous learning”. Ideally this should be a feature of the Serbian NQF, but on practical grounds of real benefits and costs I would recommend that Serbia does not invest great effort in such a system until it is shown that recognition of informal learning has become a demonstrable success in other countries. That has not yet happened.

9 The *Descriptors* result from the spontaneous ideas of a high level focus group seeking to identify the main ideas behind the existing schooling levels in Serbian vocational education, together with an examination of the relevant levels in the Serbian *nomenclature* (which appear to accord well with commonly used international constructs of job responsibility and *ISCED* constructs of various stages of schooling – no doubt there are common roots). A good deal of similarity with the *EQF* levels was also observed, which leads me to believe that there would be no great difficulty in aligning the Serbian descriptors, as proposed here, with the proposed European ‘meta-framework’. In particular the Serbian constructs will accord well with those in other ‘school-based’ systems<sup>\*</sup> in Europe.

I have tried to use the term ‘competence’ in the way it has been used in most of the previous policy papers, that is as rather separate from skills and knowledge and lying in the domain of attitudes to work, responsibility and initiative (see *Concept* paper, p, 27). Usages in some other countries indicate competence as including, and integrating, skills and knowledge, though it must be said that both between and within countries the idea of competence is unstable and contested. The definition given in the *EQF* (p,11) has competence in this ‘umbrella’ sense (*ie.* including skills and knowledge as well as personal disposition and ethical values), though in practice when used in the *EQF* descriptors (p, 18) it is differentiated from skills and knowledge and accords more with the Serbian usage. In the latest internal drafts of the *EQF* it seems that the descriptors about competence will be confined to issues of responsibility and autonomy.<sup>†</sup>

The *Proposal* contains 4 levels to be governed by a Serbian Qualifications Authority. Levels 2, 3 and 4 are intended to equate broadly with the intentions behind the current 3 year and 4 year schools, and *viša škola*. A Level 1 has been shown equating with the old 2 year school. Serbia might not wish formally to recognize this Level, but I would suggest that it should be shown because (a) large numbers of the current working population have this level of schooling, (b) it may be that some qualifications at the higher levels will indicate entry requirements at this level of schooling (see below), and (c) it may well be that some adult training will be at this Level.

10 The allocation to *EQF* levels is obviously speculative, as the descriptions of these *EQF* levels will undoubtedly change. However the ideas for changes that I have seen indicate that they are likely to fit even more comfortably with the *Descriptors* given in the *Proposal*. It will be easier to predict how the Serbian Levels would fit with the *EQF* when we know the outcome for some other countries, particularly those with similar patterns of schooling to Serbia.

The *EQF* has a Level 1 which is at the most basic level of general knowledge and personal competence, without knowledge or skills in any particular

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<sup>\*</sup> for a discussion on school-based, market-based, and ‘dual system’ ways of organizing initial vocational education, see an excellent article by Greinert in the *European Journal for VET* (No 32)

<sup>†</sup> private communication

vocational field. This may be used by some countries which have a pre-vocational stage of schooling (e.g. Netherlands), but is likely not to be used by many. There seems no tradition of this kind of schooling in Serbia, so the *Proposal* does not include it.

11. Some countries (e.g. Scotland, France, and recently England) present University level qualifications together with those appropriate for secondary schooling and adult VET in a single framework, though the authority for regulating the lower part of the framework is very different from the regulation of the University sector. This is largely a matter of presentation, and is a useful way of spreading popular understanding of the 'whole picture'. But it could also be misunderstood, particularly by Universities who could see it as an attempt to undermine their autonomy. It is suggested that any such presentation is left to a later stage in the development of an EQF (it has taken nearly ten years to gain agreement on such a presentation in England!)
13. The Diploma system is well established in Serbia. It has its parallels in very many other European countries. There are, of course, efforts and debates to reform and modernize it, from the point of view of curricula, equipment, teaching methods, etc. We can expect reform efforts to continue for many years, and no doubt the educational ideas behind reform will change from time to time. The purposes of an NQF, as described in the *Green Paper*, are to stimulate and facilitate continuous reform while retaining clarity about standards and quality. It would be a mistake for an NQF to be so precisely formulated as to require a *particular form* of curriculum organization or means of assessment. Views about these matters will change over time.
14. The need for a means of recognized certification for adults other than attending the full school-based Diploma programmes is clear, and appears in all the previous policy papers. A separation of adult (CVT) qualifications and those primarily intended for young people (IVET) is a feature in many other countries. Some, like Serbia, offer part-time opportunities for adults to enter for IVET qualifications, though the take-up is low.\* Many have a range of certificates for adults, though countries vary in the extent to which these are formally nationally recognized (in England, Denmark, France, the Netherlands there are a considerable number of recognized adult certificates; in Germany there are relatively few outside higher level qualifications for experienced workers). The trend is certainly to bring them into national recognition and to organize them distinctly. A few countries, for the most part Anglo-Saxon, have attempted to build a 'unified' system of CVT and IVET based on a common unit or modular structure. It is hard, though, to point to any obvious successes in such an endeavour and the tendency has been for a division to arise within an apparently unified system (for example in England the modular NVQs are only taken by 4 per cent of 16-18 year olds attending school or college; the reverse has happened in Scotland with 80 per cent of the *National Certificate Units* being taken by young people).
15. It is important, in the Serbian context, that the National Certificates are kept distinct from the Diplomas intended primarily for young people. There are legitimate fears that shorter, more specific, programmes might be taken by

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\* For example in Denmark adult participation in *VEUD* courses – adapted versions of their main IVET vocational programmes amounted to only 2 per cent of all recognized adult education and training. (*Facts and Figures 2005*, Danish Ministry of Education)

young people and threaten the overall aims of IVET. For this reason it is proposed that the National Certificates should only be available for older people. The age of 25 is proposed, but obviously there can be discussions about the precise age limit.

It is proposed that National Certificates would relate to 'particular occupations or important job functions'. There is a case for allowing national qualifications in a wide variety of subjects – for example languages, computer user skills *etc.* However there is danger of considerable fragmentation if this is done, with resulting public confusion. Furthermore it would be difficult to use job analysis and social partner involvement to extract agreed training standards for small 'transversal' skill areas such as these. The reference to 'important job functions' is intended to bring into scope items such as a network administrator or a receptionist in a small business – which may frequently be combined with other job roles.

One proposed feature of the National Certificate system is that providers would be able to propose curricula to meet the training standards which would be centrally stated and validated. There is a simple reason for this: we cannot know what fields of work will be demanded by adults. It would not be economic to develop curricula for adults for all the profiles that exist for Diplomas, since many would be unlikely to attract adult applicants. Instead a dual approach is proposed – for some curricula to be centrally developed as needs are clearly identified (for example through discussions with the National Employment Agency, as a result of consultation with social partners, or resulting from donor-funded projects), while leaving it open for providers and schools to propose a curriculum leading to the nationally recognized standards when they identify demand amongst potential students.

Many National Certificates, particularly at the lower levels, might not be restricted to people with a certain prior level of schooling, but sectors may consider that it is unrealistic to expect adults without a certain previous level of schooling to obtain jobs, even with additional training through National Certificates. Thus it might not be uncommon for National Certificates at Level 3 to require entrants to have already completed a Level 2 Diploma (*ie.* 3 years vocational school). In the interests of flexibility it is not suggested that this be a national rule, but rather left for decision case by case. A degree of prior work experience in a related occupation might also be set as a condition in certain cases.

18. There is a case for having the same titles for Diplomas and National Certificates. For example "Level 2 Diploma in Bakery", "Level 2 National Certificate in Bakery". This would assist in public understanding and making equivalences clear. However making this a rule of the framework might also cause trouble, with arguments about whether the two different types of qualification really yielded the same status within an occupation. Instead it is proposed that this decision is taken on a case by case basis by the National Qualifications Authority, taking advice from social partners.
19. The proposal is that all current VET profiles are classified as being recognized by the NQF when it starts. While it is recognized that many of these profiles have not been modernized and do not state outcomes which can be equated with validated training standards, it will be unfortunate and confusing to start with a situation where some qualifications are recognized by the MoES, but not recognized in the NQF. However the proposal is that when profiles are updated, and as new ones are developed, they should satisfy the NQF

procedures, in particular relating to independently validated training standards.

21, Sectoral Classification It is not essential that an NQF should have a sectoral or occupational classification, but this is likely to be of assistance in Serbia, which already has well established 'fields of work' in both the *Nomenclature* and in the organization of school profiles. It is expected that this classification would be the starting point for an NQF, though it will help to do some preliminary work in order to explore its relation with other commonly used groupings which might make the involvement of social partners easier.

Elaborate Vocational Education Standards The proposal is that the function of elaborating VET standards should be split from the function of developing curricula. The former is a matter of analysis and negotiation while the latter is a matter of pedagogical effectiveness and integration. The idea of vocational education standards has been variously described in the previous policy papers. The *White Paper* (p, 14) referred to "standards of achievement (results)" and said "it is important that these standards are defined with sufficient precision to provide a reasonable guarantee that they can be applied consistently". Professor Despotivić (p 13) refers to "establishment of the vocational standards, or the competencies for the profiles" and envisaged "commissions for standards and assessment criteria (p, 15). The *Methodology of Curriculum Development in Vocational Education and Training and Adult Education* (section 3.3) refers to "outcomes" which "represent clearly and unequivocally defined work competencies, knowledge, skills, potentials, attitudes and values, which are achieved after a particular programme" and makes it clear that "in vocational education and training outcomes/goals are derived from professional roles and responsibilities of job descriptions". As the *Methodology* makes clear, these outcomes or standards are not necessarily identical to occupational standards (performance standards for people actually engaged in work), but should be derived from them; in some respects vocational education standards may demand more than the occupational standards for a particular job role (for example competencies for longer term career progression), in other respects they may demand rather less (for example, experience at work obviously leads to greater working speeds and familiarity with advanced equipment which cannot easily be achieved in a training situation).

The *Methodology* also makes clear that these standards should be formulated before a specific curriculum is created. The point of the standards is to make clear what knowledge, skills and competence the curriculum should aim to produce.

Vocational education standards are therefore central to a national qualifications framework which "provides conditions for the definition and consistent application of educational standards" (*Green Paper, p 18*). The role of elaborating them is a complex one, combining:

- analysis of job roles, including formal techniques to derive occupational standards;
- involving experienced workers, supervisors and managers;
- precise and consistent use of terminology and classification systems;
- realism about what can, and what cannot be cost-effectively taught in schools;
- Sensitivity to balance and negotiate immediate job needs with objectives of career development and personal development.

Fortunately there is much experience on which to draw, including freely

available material from other countries which have undertaken the same task.\*

A particular issue that arises is how to structure the expression of vocational education standards. It is common to do so in a 'unit' fashion with clusters of detailed standards grouped into major aspects of a job role, and a job role consisting of a grouping of 'units'<sup>†</sup>. This is a useful means of organizing occupational standards, and facilitates discussion with employers who generally have little difficulty in recognizing the features of work organization. However problems can arise if those same units are used to structure modular educational programmes, as the logic of pedagogy and sequencing of modules is different from the logic of work organization. To take a simple example: knowledge of electrical principles is needed in a wide range of common functions in the maintenance and repair of motor vehicles; it would make little sense, pedagogically, to teach portions of relevant electrical principles in a series of modules concerned with diagnosing engine faults, maintaining the vehicle braking system *etc.* though these clusters would make more sense from the point of view of work organization.

If this is accepted there is an important issue for the *organization and structuring* of vocational education standards. Is it better to have these organized in a way which relates to the world of work (units), leaving it to those who develop a particular curriculum to re-organize them into a subject/modular system which suits the natural systems of pedagogy (while of course meeting the standards in their totality); or is it better to organize individual training standards in a way which relates to pedagogy (modules), so that each subject/module has appropriate outcomes?

There are arguments for both approaches, and this is an area which merits careful thought, building on the experience of the pilot profiles in Serbia. But one consideration is especially relevant. If the vocational education standards are organized in a module (pedagogic) structure, then it is likely that quite separate sets of standards will need to be generated for adult qualifications (National Certificates in the *Proposal*). It will not generally be possible to take a subset of modules of vocational education standards from Diplomas to use in National Certificates – a different modular structure will need in many cases to be elaborated. This is no doubt the distinction made in the *Concept Paper* and *Despotović* between 'integral' and 'fragmentary' modular systems. Though an ideal situation would be to have suites of both types of modules centrally designed, this would be a massive undertaking and there would be a high chance that many of the 'fragmentary' modules would never actually be used.

The suggestion therefore is that it would be more economic for the training standards to be expressed in unit terms without necessarily attempting to structure them in a pedagogical sequence, therefore leaving the developers of the curriculum to 'translate' them into particular pedagogic structures. This would be done by the Curriculum Division for Diplomas, by the VET centre for selected National Certificates in priority areas, and by accredited providers in the case of National Certificate programmes which were needed locally. In the case of National Certificates it would need to be shown clearly which sub-set of

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\* see for example a full suite of English occupational standards at <http://www.ukstandards.org/> summary descriptions of educational profiles in Germany at <http://www.bibb.de/de/ausbildungsprofile-start.htm> and new profiles developed with training standards in Romania at <http://www.old.edu.ro/pregprof.htm>.

<sup>†</sup> there is a growing, but not universal, tendency in England to use the term 'unit' to refer to a grouping of occupational or training *standards*, while using the term 'module' to refer to a segment of an educational programme.

vocational education standards the proposed curriculum aimed to meet.

Establish  
assessment  
requirements

The proposal is that the VET Centre should do the technical work in establishing guidelines for assessment for individual Diplomas and National Certificates. It is to be expected that the NQA will lay down some general guidelines at national level, and it is possible that the panels of social partners used to validate standards will express a preference for particular types of assessment which would be recognized in their sectors.

The degree of precision of assessment requirements may be expected to vary between qualifications and from time to time. It would not be appropriate for an NQF to lay down any particular mode of assessment to apply to all qualifications.

Accredit and  
monitor  
organizations

There is a case for the NQA to perform this function. However it seems inescapable that the MoES should determine whether or not a school should be recognized as part of the national education system, and it would be absurd for a secondary VET school to be recognized for educational purposes, but not permitted to train its students towards Diplomas.

However the NQA and the MoES should agree general accreditation criteria, and these should be published.

It might be more reasonable for the NQA to accredit providers of National Certificates since these will include private providers. However the MoES has regionally-based inspectors, and it seems sensible to utilize experienced staff for this important function. It is suggested that the MoES be empowered to delegate the monitoring role to other public bodies if it so wishes. This will introduce an opportunity for flexibility if there are organizational changes in government (e.g. decentralization. or changes of responsibilities between Ministries).

Issue papers

It would be possible for students to apply direct to the NQA to obtain their formal qualifications. However they would need some paper from their school or provider to establish that they had fulfilled the requirements, and so a separate application seems an unnecessary step. Instead it is proposed that the schools should issue the formal papers, in a form laid down by the NQA, and with its mark clearly shown.

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