The UK Qualifications and Credit Framework: a critique

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Abstract

National and transnational qualifications frameworks are an increasingly present feature of the education and training landscape. The United Kingdom can be regarded as one of the pioneers of qualifications frameworks, with partial frameworks appearing from the mid-1980s onwards. However, approaches in England if not in the whole of the UK have remained fragmented compared with the best examples from other countries. The recently-introduced Qualifications and Credit Framework (QCF) introduces partial innovations particularly in enabling credit for smaller achievements and allowing employers and practitioner communities to contribute content into the framework. However, the framework is largely limited to vocational qualifications outside of universities; it is not particularly well integrated with the higher education, professional, and at present school sectors; and it lacks responsiveness to innovations in qualification design. The QCF has been described as a 'strong' or regulated framework, although a more apposite term might be 'brittle.'

Introduction

In the last two to three decades there have been growing concerns in many countries to classify and regulate qualifications for various purposes, including to bring a degree of coherence to burgeoning and complex qualifications markets, to provide clearer information to learners about access and progression, to aid reforms such as separating qualifications from defined education and training processes or providing formal recognition of previous learning, and to facilitate comparison of qualifications between sectors and between countries. A major outcome of these concerns has been the development of qualifications frameworks, placing qualifications into a series of levels signifying progression generally in terms of the complexity of learning and achievement involved; in 2010 the European Training Foundation reported that 120 countries worldwide had or were developing such frameworks (Bjørnavold & Pevec Grm 2010). More recently meta-frameworks have begun to appear at a transnational level, as exemplified by the European Qualifications Framework (EQF, see European Communities 2008). While the effectiveness and fitness for purpose of qualifications frameworks do not go unchallenged (e.g. Lester 2001, Young 2007), for the immediate future at least they appear to be a fixture in the education and training landscape of Europe and beyond.

The United Kingdom's first serious attempt to develop a nationwide qualifications framework was the National Vocational Qualifications (NVQ) framework introduced in 1987. Roughly in parallel with this a system of higher education levels (though not a formal qualifications framework) appeared under the aegis of the former Council for National Academic Awards (CNAA), the body responsible at that time for validating higher education awards in institutions without their own degree-awarding powers. This article is principally concerned with the Qualifications and Credit Framework (QCF), a third-

generation successor to the NVQ framework which came into operation in 2008 for vocational qualifications in England, Wales and Northern Ireland.

The context and evolution of the Qualifications and Credit Framework

The NVQ framework referred to above was set up within the scope of the UK government's New Training Initiative (Manpower Services Commission 1981) in response to the De Ville review of vocational qualifications outside of the higher education sector (Manpower Services Commission 1986). The view expressed in the latter was essentially that the vocational qualifications system was difficult to understand, it contained too many individual awards, there was an uneven spread of awards (overlaps in some areas and a sparsity in others), and some qualifications appeared poorly related to employment or progression goals. The UK is also relatively unusual in international terms in having a large number of organisations that award qualifications within its publicly-funded education sector in competition with one another. The NVQ framework was developed to impose some order on this apparent chaos and classify qualifications according to their level and occupational sector. Although the initial conception was of gradual reform by controlling the qualifications that could be admitted to the framework, as it developed the framework was narrowed to newly-designed work-oriented awards based on a model that evolved out of the need to validate work-based training programmes for young people: these were designed via a standardised methodology by a series of industry-specific bodies created or approved for the purpose, and accredited by a new National Council for Vocational Qualifications (see Raggatt & Williams 1999 for a detailed discussion of these developments and the policy issues surrounding them).

A decade later it was apparent that the NVQ reforms were heading into a cul-de-sac, the focus of the qualifications on certificating workplace competence making them unsuitable as replacements for more than a proportion of pre-existing vocational awards. The NVQ framework was opened up, initially uneasily, to a wider range of qualifications as the National Qualifications Framework (NQF) for England, Wales and Northern Ireland, overseen principally by a new Qualifications and Curriculum Authority (QCA) responsible for regulating both school and vocational awards. In 2003 this framework was revised and expanded from five levels to eight plus an entry or basic skills level (the 'eight plus one' model), allowing the upper part of the framework to sit parallel with the recently-introduced five-level higher education framework. There was an expectation that all publicly-funded qualifications, excluding those made by degree-awarding institutions but including secondary education certificates (GCSEs and GCE A-levels), would be placed in the framework.

In parallel with the NVQ project developments also took place in higher education that would eventually lead to separate higher education qualifications and credit frameworks. After the CNAA was wound up in 1992 its work on levels and credit continued through regional credit consortia and through the Open University, with eventual agreement on the five levels referred to above. In 2001 a qualifications framework was agreed for higher education through the Quality Assurance Agency for Higher Education (QAA) (the Framework for Higher Education Qualifications or FHEQ, see QAA 2008a), followed by a national agreement on credit in 2008.

A third strand of development took place through Open College Networks (OCNs), regional groupings of colleges and adult education providers that started to appear in the 1970s to provide open-access adult provision geared largely to job entry and access to higher education. The Manchester network

pioneered a system of credit to support learners' progress (Black 1982), a practice which soon spread to other networks and by 1990 formed a national credit and levels framework parallel with the NVQ framework. The OCN model placed credit rather than qualifications to the fore, enabling learners to accumulate credits that had a currency of their own outside of identifiable qualifications. Although this model had emerged out of local initiatives it started to influence thinking at a national level through the work of organisations such as the public-sector research and development body the Further Education Unit (e.g. FEU 1991), the voluntary National Institute of Adult Continuing Education, and the national e-learning organisation Ufi-Learndirect which had evolved out of the government's University for Industry initiative.

The revision of the NQF to the 'eight plus one' model had increased its flexibility and made it more compatible with practice in higher education, but there was also recognition that it needed to incorporate smaller 'chunks' of learning and provide recognition for credit. While almost all NQF qualifications were made up of units there was no facility for incorporating units within the system independently of qualifications or for comparing them between one series of qualifications and another. In 2004 intentions were announced to develop a credit-based qualifications framework to succeed the NQF (QCA 2004). What was provisionally called the Framework for Achievement was taken forward through development and trialling phases between 2005 and 2007, and officially launched as the Qualifications and Credit Framework (QCF) in 2008.

The QCF: approach, specification and coverage

The basic philosophy of the embryo Framework for Achievement was that it should allow achievements to be captured, expressed and certificated regardless of their size or level or of how or where the learning took place, effectively enabling adults to gain credit for any learning achievement or area of skill that they could demonstrate. This philosophy carried over into the QCF, but with the more pragmatic proviso that learning would need to match to an output-based unit specification: the QCF was to be a regulatory framework of pre-designed units and qualifications, with a central authority (now Ofqual in England) responsible for approving units and qualification structures. Where this departed significantly from the NQF was that units rather than qualifications were envisaged as the primary currency, and all units would carry a credit-rating based (as in higher education) on one credit equalling ten notional hours of learning. The Open College Network approach of designing units first and (where appropriate) combining them into qualifications afterwards was carried over into the QCF (see Wilson 2010).

The QCF as presently defined (QCA 2007) requires units to be structured according to a standard format of learning outcomes and assessment criteria, to be credit-rated, and to be specified at a particular level. Qualifications are defined by rules for combining units, which can vary widely in complexity depending on the needs of the qualification; they will typically include lists of mandatory units, groups of units from which specified numbers or combinations must be chosen, sometimes prohibited combinations, and occasionally free choices of units. While there is a facility to identify qualifications meeting certain requirements as NVQs, this has not been widely used and the QCF has effectively spelled the end of NVQs as a distinct category of qualification.

The QCF makes a distinction not present in the NQF between organisations authorised to submit units to the framework, those able to specify rules for combining units into qualifications, and those

responsible for awarding credits and qualifications (i.e. examining and awarding bodies). This has created an opportunity for organisations that would not want to award qualifications to specify their content; typically this role has been taken up by a few large employers as well as industry and professional associations, and it has also allowed Sector Skills Councils (the industry skills bodies responsible for occupational standards) to submit units directly rather than via awarding bodies. Compared with the NQF this opens the QCF to a wider range of awards, including industry and user certification that has not previously been included in the UK frameworks.

The QCF will have substantially replaced the NQF by mid-2011, with most vocational and pre-vocational qualifications being respecified in the new format. The only awards in the NQF that will not appear immediately in the QCF are the secondary education certificates, on the basis that admittance in their present form would compromise the QCF regulations while to insist that school certificates are changed and renamed to meet QCF design principles would be educationally and politically questionable. While there is no official articulation between the QCF and the higher education framework at least in England, the use of parallel level systems make comparisons possible; both frameworks are also linked (though somewhat tenuously) via the respective European frameworks, the QCF having been mapped to the EQF (QCDA/CCEA 2009) and the FHEQ to the framework of the European Higher Education Area (QAA 2008b), with the upper levels of the two European frameworks being regarded as parallel.

Outside of England arrangements are slightly different. In Scotland a separate framework (the SCQF, see SCQF Partnership 2003) was agreed in 2001 around a different if mostly compatible set of twelve levels, with a fairly comprehensive coverage that includes higher education qualifications and secondary education certificates as well as vocational and basic skills qualifications. In Wales a comprehensive meta-framework was launched in 2002, incorporating the NQF (later QCF) and the FHEQ and adding a third stream for achievements represented in neither framework. In Northern Ireland a credit framework embracing further and higher education has been in use since the late 1990s, although officially the situation is the same as in England with the QCF and the FHEQ operating independently of one another.

The QCF as a national framework

One of the most noticeable features of the QCF in comparison with most other national frameworks is that it covers only part of the qualifications system. Unless the position of secondary education certificates is resolved, the QCF will represent principally vocational and basic skills qualifications, while most of its international comparators also span higher education and the schools system. An argument can be made that the QCF was developed principally as a regulatory framework for vocational qualifications, but this doesn't help either the increasingly out-of-step position of England in respect of qualification frameworks internationally, or the often-voiced aim of reducing or removing the traditional distinction between vocational and general education particularly at ages 14-18.

The QCF as presently constructed has been designed around principles taken from adult further education which do not always sit easily with those used in schools or higher education. In principle the question of secondary education certificates should not be too difficult to resolve, as like the current population of the QCF these qualifications are subject to external regulation and are tightly specified. GCSEs and A-levels are also in some respects already a unitised system (i.e. certificates

are achieved in individual subjects rather than a single overall diploma being awarded), although these 'units' are large compared with most of those in the QCF at the same levels; however, flexibility on the part of the QCF regulators even *within* the existing design principles suggests a compromise can be reached, while from the other direction the QCF offers principles that could be used for a limited or more extensive reform of school qualifications.

In relation to higher education, the FHEQ has a significantly different purpose to that of the QCF. It is not a regulatory framework but a voluntarily agreed set of benchmarks for promoting common standards between universities and providing a language for communicating the positioning of the various higher education qualifications. While notions such as qualification and credit levels, modules, and the ten-hour standard for credit are used fairly widely in the university system, credit is not universal and in most cases modules are designed to be part of specific qualifications or groups of qualifications. There is therefore no question of current QCF principles being extended into higher education, though there is enough common ground between the two systems to enable them to be incorporated into a 'loose' or meta-framework (Tuck 2007) as has been done in Wales.

Issues of unitisation and credit

Both the NQF and the NVQ framework contained a fairly general presupposition that qualifications would be made up of (or would themselves be) units. As described above the QCF introduces a mandatory requirement for units to carry a credit-rating (common for many pre-existing NQF qualifications though not for NVQs), and introduces a subtle change in emphasis from qualifications to units. This brings with it at least two issues.

The approach to credit used in the QCF follows similar principles to those used by the Open College Networks and by some vocational awarding bodies, notably Edexcel. This is essentially an educational approach to unit design, where a unit is specified in terms of learning outcomes (or more correctly objectives) and assessment criteria, and is given a credit rating based on the average learning time needed to complete the unit. Unit developers are also encouraged to specify the number of hours that the learner is expected to have tutor or other formal support ('guided learning hours'). This basic design is broadly in keeping with modern practice across much of UK further education. It does not however fit as well with some kinds of industry or professional qualifications, particularly where the award is designed primarily to attest to proficiency rather than to provide certification at the end of a training period, for three reasons. First, it is difficult to ensure holistic capability through credit accumulation over time, particularly where candidates need to combine a broad range of skills, knowledge and approaches to resolve complex issues successfully. Secondly, even mildly sophisticated assessment models – such as those that combine functional or knowledge-based themes with cross-cutting values or behavioural skills – become clumsy and inadequate in a system that does not provide for assessable components to be specified outside of units: the skills or values are either split up and distributed among the other units, isolated in a unit of their own, or treated as desirable but not assessable. Thirdly, the use of a time-based credit model assumes that candidates are moving from a point of lesser ability to one where they satisfy the unit's assessment criteria, building in a process dimension to what is otherwise a freestanding assessment specification. While the idea of giving a credit value to an achievement in its own right is not intrinsically problematic, the credit model used in the QCF requires a nominal starting-point; particularly at the

higher levels of the framework some units would logically represent thousands of hours of learning if an existing level of relevant knowledge and skill is not assumed.

A second and potentially more pervasive issue is the extent to which a unitised system can favour surface-level and atomistic learning (Marton & Saljö 1976). This discussion is much older than the QCF (and it has not proved a major barrier to well-designed credit systems), but there are two points that relate specifically to the new framework. The first concerns the lack of any direct appraisal of the overall level of a qualification; the level is simply assumed from the rules for combining units, without any check being made that the exit level of successful candidates can reasonably be expected to match the level claimed for the qualification. This becomes a matter for concern when it combines with the second point, which is a tendency for QCF units to be relatively small. Examining a sample of qualifications at the highest two levels of the framework indicates that some are made up exclusively of small units (ten credits or less), potentially making it difficult to ensure the depth and integration that are expected in the QCF's own level criteria. At least at the upper levels (where the framework is least well-tested) it is therefore unclear whether the QCF's design rules are sufficient to give confidence in the level being claimed for some qualifications.

The QCF's capacity to support innovation

The QCF is in itself an innovative development, both in linking the credit-based approach pioneered by the Open College Networks to a qualifications framework, and in enabling relevant organisations to submit units and potentially qualification structures without becoming directly involved in processes of examining and awarding. In this respect it has responded to the Leitch skills review (Leitch 2006) in moving away from the central planning approach that grew out of the New Training Initiative and replacing it with something that is closer to being led by the needs of learners and employers. The framework is however less flexible in its ability to respond to innovations from within the qualification system, including some that are now well-established in higher and professional education.

The current QCF rules for defining and combining units assume that the structure of qualifications should be determined in advance by an awarding body or similar authority. While this accommodates the majority of potential qualifications, it prevents qualifications being assembled in real time either by employers or other organisations working with groups of learners, or by individual learners in negotiation with a provider or awarding body. This facility has been available since the early 1990s in UK higher education, where it is geared particularly to the needs of enterprises and mature learners wanting to put together programmes that reflect work needs, career aspirations or business goals (Lester & Costley 2010); typically it uses a learning agreement to define the individual or cohort-based programme and ensure its coherence. In relation to the QCF, an argument is sometimes made that learners working at the lower framework levels are less capable of negotiating individual programmes, but the success of individually-negotiated pathways on pre-apprenticeship courses (to give one example) suggests this is unsupported provided learners are given adequate guidance (Spielhofer *et al* 2003); added to which it is perverse to restrict the whole framework because of an argument made for only part of it.

A closely-related point is the lack of capacity within the QCF to recognise learning and achievement that is not reflected in accredited units. In the early stages of development there was some support for recognising achievements by matching them directly against level-based criteria, outside of any

unit or qualification structure, and providing credit as appropriate. The current framework encourages the recognition of prior learning and achievement within units, as well as exemptions from units within a qualification on the basis of equivalent learning gained elsewhere. However, it doesn't support either the granting of 'general credit' that doesn't match to units already accredited within the framework, or the acceptance of achievements that, while they don't meet the requirements of any specific units included in a qualification's design rules, do represent an acceptable alternative in the context of the overall qualification. The use of template units with generic level-based criteria and a range of credit sizes could in theory provide a solution to this within QCF rules, but it would need to be possible for what is officially the same unit to appear more than once (with different individual outcomes) in the same qualification. This latter approach has been present (if in a limited way) in higher education for two decades, and developments from it – such as building individualised accredited programmes around reflection and expansion on prior learning (Lester & Costley 2010) – are now emerging that would create further challenges if they were to be proposed within the QCF.

Finally, although the QCF has enabled large employers to become involved in qualification design it is much less responsive to the needs of small groups wishing to gain recognition for achievements through customised training programmes or to validate proficiency in a particular field. There is evidence to suggest that where small but distinct occupational groups want to have suitable qualifications recognised, the costs and processes involved can still be prohibitive if only a small throughput of candidates is expected (e.g. Lester 2009). While a stated purpose of the QCF is to incorporate the majority of qualifications that previously existed outside of any national framework, it will fail in this objective if the regulatory arrangements discourage organisations that award qualifications to small numbers of candidates from joining the framework. This is a particular issue for the coherence of the overall qualifications system, as while the framework does little to prevent the proliferation of competing units and qualifications in popular areas, it still creates barriers to including niche awards.

Professional qualifications: a missing link

In the UK there is a particularly strong tradition where qualified status in many occupations, particularly but not only at the level associated with graduate entry, is granted by a professional association or registration body. Qualified status may be required by law in order to practise, it may be demanded by insurers or by major employers and clients, or it may simply be a means of gaining greater recognition in the employment or professional services market. Normally this status is not a qualification in the sense that would be recognised in the public education system, but admission to a register or class of membership based on various combinations of recognised qualifications, supervised and unsupervised practice, and passing the profession's own assessment processes; unlike most certificates, diplomas and degrees it can be revoked for malpractice or failure to keep up-to-date, or given up on retirement or a change of career.

Since the launch of the QCF some professions that run their own courses and examinations have been persuaded to certificate them independently of membership or registration, and place them in the framework. Qualified status is however unsuitable to be placed in a regulatory framework even if it is achieved through a process (such as a series of examinations or production of a work portfolio, or both) similar to that used for permanent qualifications; doing so would draw qualifications regulators such as Ofqual into areas of professional regulation that are outside their area of authority and

expertise. Nevertheless professional registration forms a major part of the qualifications landscape at the upper levels, in many fields it carries greater weight with individuals and employers than permanent qualifications, and it is frequently the ultimate qualification goal of people going through the vocational or higher education system. While it is usually an end-point in itself it can also be used to gain access to or partial exemption from other qualifications such as higher degrees. The question of level and sometimes credit equivalence can therefore arise for qualified status in the same way as it does for vocational or higher education awards, and some professional bodies have obtained assessments (normally from universities) of where, effectively, their designations would fit in the qualification system.

In a country where professional bodies play a major role in the overall system of qualifications the lack of links at framework level between vocational qualifications and professional status is a significant shortcoming. Currently, understanding of professional qualifications and qualifying routes can be extremely variable among the UK organisations involved in framework development and associated activities such as developing occupational standards; when many professions are attempting to diversify entry-routes and create pathways for non-graduates and mature entrants (Lester 2008), this can hinder the development of appropriate progression-routes particularly via vocational qualifications. The QCF is not an appropriate place to position memberships and registrations, but a facility is needed to indicate where qualified status in different professions sits in terms of level and potentially what credit it might provide back into the system.

Conclusions

The evaluation of the QCF trials commissioned by the English and Northern Irish qualifications authorities (PricewaterhouseCoopers 2007) reported that the framework was generally well-received and workable. It also commented that the QCF stood up well internationally, and as a 'strong' (Young 2003), 'tight' (Tuck 2007) or regulated framework it provided a vehicle for reforming the qualifications system as well as for registering qualifications. This theme has been further developed by Wilson (2010) in identifying the QCF as a 'second generation' or credit-based qualifications framework, and while recognising its location in a relatively unique UK context, commending it as a potential model for international adoption and adaptation.

The QCF however suffers from a number of drawbacks that make it less than suitable as a model for a genuine national framework. As described above it has been developed with its main focus on the vocational and pre-vocational education and training arena, without particular attention to how it will integrate with higher education or the schools sector. It ignores how professional qualifications relate to the rest of the system, though it is far from alone in this. It is also currently too restricted by its operational regulations to accommodate many minority qualifications. Perhaps most importantly however its design principles identify it as a product of one particular set of innovations from the last decades of the twentieth century, without the flexibility to support emerging developments or even accommodate established innovations from other parts of the system. The UK approach as a whole can offer learning-points to some of the developing frameworks in Europe and beyond in its established focus on the outcomes rather than the stages of learning and in its use of credit, but the higher education and Scottish frameworks have as much to offer here as has the QCF.

Evidence from New Zealand (Philips 2003, Strathdee 2009) and South Africa (Allais 2007, 2009) indicates that where 'tight' frameworks have been introduced into an existing, diverse qualifications system they have had to be modified considerably to make them workable across more than a limited part of the system. Both Tuck (2007) and Young (2008) comment that qualifications frameworks can only have limited success on their own as vehicles of reform; the English experience with the NVQ framework, the NQF and now the QCF suggests that while frameworks can assist reform, this is more modest than what is often envisaged, it needs to be focused on the relevant part of the overall system, and it also needs to be limited to what is both genuinely necessary and feasible (cf Raffe 2009). Judged as a means of introducing a common credit standard across the vocational qualifications system and enabling a wider range of stakeholders to develop awards and units, the QCF is likely to have a measure of success; as a wider national framework it is not. The NVQ framework was successful in establishing the principle of certification based on demonstrating a standard of achievement rather than completing a process of learning, as well as ostensibly giving some control of curricula to employers and workers, but it was too inflexible to survive once these aims had been achieved. The QCF, while not as obviously rigid or bureaucratic, still imposes a set of design principles that will become increasingly restrictive and outdated as thinking on qualification design moves on; its lifespan, at least without substantial revision, is unlikely to be much more than that of its predecessors (the NVQ framework in its original form and the NQF each lasted approximately a decade). Frameworks of this type might be described rather than 'strong' as 'brittle,' in the sense that they have limited capacity to absorb and adapt to the pressures of change before they fracture.

Across the area influenced by the European Union (see Bjørnavold & Pevec Grm 2010 for a summary) two main approaches are emerging. One is to develop a homogeneous framework, without sub-frameworks or distinctions between different parts of the qualification system, as is being done in Poland, Croatia and now Germany. This is potentially a powerful way to communicate equivalence and support progression, though depending on how and in what context it is applied there are risks of rigidity and subsequent failure. The second model recognises differences in different areas of education and training, while developing a framework that integrates them; the Irish, Belgian, Austrian and Welsh frameworks provide different examples within this overall approach, with the Irish framework closest to the homogeneous model. The approach taken in England of having different, loosely-linked frameworks for different parts of the system is now rare; although it can be argued that Germany has had a binary system this is now being brought together in a comprehensive framework, and the only EU and accession countries not currently working towards single frameworks are Greece and Spain.

England presents a particular case where there are both regulated and self-governing qualifications subsystems with strong traditions of their own, so the logical next step towards a comprehensive framework will need to respect and bridge between these traditions rather than impose an external structure on them. An example of what can be done is provided by the Scottish framework, which has been successful because of its flexibility, the level of consensus around its development, and the fact that it is operated by a partnership of interests rather than a single regulator (Young 2005, Raffe *et al* 2007). These characteristics, together with the fact that it is designed primarily as a facilitative and communicative device rather than a regulatory or a reforming one (a 'loose' framework according to Tuck), appear to have made it reasonably resilient. The SCQF (like its Welsh counterpart) works on the basis of minimum design principles (level, credit and quality-assured assessment), and

accommodates state- and self-regulated strands as well as acting as a positioning tool for qualifications outside of the official framework. It is not without room for improvement, but in principle it offers a model that can be adapted to the needs of a multifaceted qualifications system such as that in England.

To conclude, the QCF and its developers deserve credit for introducing, relatively painlessly, a more responsive set of structures to replace the NQF that had emerged uncertainly from the shadow of the restrictive and centralist NVQ framework. It is less creditable that the QCF is both already out-of-date in responding to developments in qualification design, and focused inward on the vocational sector rather than integrating more seamlessly with the school, university and professional arenas. The framework is not entirely a missed opportunity, but it needs to be given the flexibility to adapt and evolve; it also leaves open the question why England is one of the few countries in Europe not to have or be working towards a comprehensive national qualifications framework.

Acknowledgements

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