

**Notes on how to reconcile both TVSDC and NQF by laws**

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**1. What is NQF and its implications?**

***Right now in Jordan, we have qualifications and certificates issued by 3 different authorities (Higher Education, General Education and TVET).***

***These follow different standards, methodologies (teacher centered/no relation to labour market demands etc) and many challenges***

***So, why not bring all these qualifications into one common understanding of standards, policies and testing/awarding of qualifications or certificates and ensure that labour market have a say on all these issues?***

National Qualifications Framework is, in the simplest understanding: **it’s the organization of all qualifications into one system**.

Its like the “frame” and not the building itself- the frame gives “shape and strength to the whole building”.

So a national framework gives- standards, shape, overall consistency and most importantly a general recognition of its quality to all the qualifications in one direction.

**2. The Scope of NQF**

Some NQFs are only related to TVET (sometimes called NVQFs) while other countries have a unified system of all learning (HE, GE and TVET- both formal and informal- all forms and levels of training).

In Jordan, the NQF by law states: *The provisions of this bylaw shall apply to all awarding bodies in the kingdom* (so it’s a unified NQF like Wales, Ireland, UK, South Africa, Australia etc).

The NQFs can be a “loose regulatory frameworks” (as in Wales or UK) or very tight and prescriptive regulatory frameworks (as in Ireland or South Africa).

A quick review of the two by-laws point that both the NQF by law is quite a ‘loose’ regulatory approach (where the AQACHEI takes regulatory responsibility of all overall polices/standards and levels (1-10) while other QA bodies/awarding bodies are mandated to detail the policies into implementation/and self-regulation aligned to NQF policies.

Very tight frameworks are difficult to be implemented as experiences show because of already well established regulatory bodies (as in the case of Jordan with MoEHE, MoE and MoL/TVSDC leading different sub sectors of education and training).

**Recommendation**: *Incremental implementation* is recommended for Jordan as TVQF has already been piloted, most draft policies in place. However, the current capacity of TVSDC/CAQA to implement effectively TVQF in the country aligned to NQF standards/polices (which are yet to be developed and approved) is something we should immediately address.

**3. Governance of NQF**

NQF governance includes all the activities that are purposeful efforts to guide, steer, control and manage NQF development and implementation. Examples include legislation, the roles of implementing agencies and funding (as almost all cases on NQF demonstrate that governance is with a Qualification Authority and funding is almost exclusively by the governments and user fees).

**Recommendation**: While AQCHEI (NQF Board) is ultimately responsible for the governance of NQF, as the responsible body for TVET, TVSDC may develop, in coordination with AQACHEI/NQF board, and implement, register the qualifications on TVQF sub framework (if approved by NQF board/council). This may solve some of the existing conflicts in the 2 by laws. General policies by NQF and specific policies/standards for TVET by TVSDC. NQF influence is limited to qualifications and learning outcomes/QA standards/accreditation/certification and registration of qualifications.

However, NQF has no oversight nor guidance on the running of TVSDC nor its funding mechanism.

**4. One System- 3 sub frameworks**

NQF can be organized as one NQF system for all Jordan, yet with 3 sub frameworks for HE, GE and TVET as each sub sector is unique. General policies can be the same (such as agreement on the learning outcomes and learning hours (Credits) and credit framework/transfer; Level descriptors; equivalency etc) while specific methodologies (CBT/SSCs for example) is very unique to TVET and vocational or professional subjects.

Recommendation: TVSDC should demand such a flexible NQF implementation modality and its well documented in both the laws.

**5. General comments on TVSDC law**

This bylaw, to any third party, is very ***repetitive and not specific nor clear*** enough to be interpreted.

Secondly, for ***independence of TVSDC*** is not ensured if the policies are “prepared by MoL”. TVSDC should serve the interests of all ETVET sector and the policies should be set by the independent board itself!

Also, ***staffing from various sectors/line ministries and independent experts*** from private sector/industry. This is critical for comparative advantage with current commissions and to ensure that business is not government style operations!

***The urgency to speed up NQF discussions***: It is very critical that formal discussions are initiated with NQF board/AQACHEI on overall policies and NQF implementation plan. Both parties should discus and agree on the division of labour and how to implement their respective laws. Also, such a discussion can iron out differences on the ‘conflicting or competing provisions in both the laws’.

TVSDC may share its experiences with AQACHEI on **SSCs** and how to enlarge SSC role to support NQF implementation beyond TVET sub sector.

**The two by laws (TVSDC and NQF/AQACHEI)**

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| **TVSDC**  | **NQF by law** | **Comments/Observations** |
| (Article 3/B:1) accreditation and supervision of TVET providers, organizing their work, evaluate, control their performance, supervising the implementation of TVET programs that do not provide a scientific degree in order to meet the needs of the labour market | (q) Prepare the guidelines for qualifications’ quality assurance to be followed by the institutions responsible for quality assurance and provider institutions in the Kingdom to develop and implement their procedures in order to accredit and assure the qualifications’ quality  | TVSDC and NQF board should reach an agreement to what level of TVET streams, TVSDC will be responsible for all matters related to NQF (implementation) |
| A3/B:6) **6**- Registration of qualifications in the national qualifications framework | (A4/H) *Coordinate with the institutions responsible for quality assurance* for reviewing applications of institutional listing(A4/I) *Review applications of national qualifications to be placed in the Framework* | Two *registration* processes are not ideal and will lead to conflict. What if one approves and the other rejects?This need to be clarified registration by who and listing on NQF by who? |
| Supervising vocational tests and issuing certificates according to the criteria approved by the council for this purpose | (A4/M) Issue certificates of qualifications listingalong with qualifications’ certificate resulting from prior learning under instructions issued for this purpose | Both laws state they issue certificatesNeed an understanding on this- TVSDC issues certificates for TVET upto Level 4 or 5 and that NQF and MoE issue GE Certificate to Level 4 |
| Organizing the vocational work and its level according to the national qualifications framework and practicing the occupation in coordination with the concerned authoritiesaccording to the applicable legislations.Preparing vocational standards, conditions of licensing and accreditation for technical and vocational training providers, registration of qualifications, examination bodies, classification of vocational trainers, fees and wages for vocational tests and other issues related to the commission under a bylaw issued for this purpose. | The awarding bodies of vocational and technical training qualifications shall commit to submitting applications for qualifications listing in the Framework to the Commission through the Center | No conflict as the two laws are clear that the general descriptors is the AQACEHI responsibility but specific level descriptors and Level placement is the responsibility of QA bodies |
| **-** To prepare the bases and criteria for the equivalence and accreditation of vocational and technical qualifications, certificates and documents issued by international accreditation bodies according to a bylaw issued for this purpose | The fees of listing awarding bodies and provider institutions shall be determined in coordination with the Center regarding vocational and technical qualifications subject to instructions will issued for this purpose. The instructions shall determine the fees for awarding bodies and provider institutions, and the fees of equivalency of foreign qualification in the framework | This can be an issue of debate- who pays whom? |
| **13-** Preparing vocational standards, conditions of licensing and accreditation for technical and vocational training providers, registration of qualifications, examination bodies, classification of vocational trainers, fees and wages for vocational tests and other issues related to the commission under a bylaw issued for this purpose.**14-** Licensing and accreditation of TVET providers in the public and private sectors.**15-** Licensing bodies to carry out licensing tests for vocational and technical levels for accreditation | Standards of Entry, progression, progression routes | No direct conflict if general policies remain AQACHEI responsibilities and TVSDC specifically develop standards/accreditation criteria in line with general NQF policies/standards which are developed jointly by the 3 ministries and approved by NQF board/commission (which includes rep from TVSDC/MoE etc) |
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