

Report on the referencing of the Finnish National Qualifications Framework to the European Qualifications Framework and the Framework for Qualifications of the European Higher Education Area



FINNISH NATIONAL
AGENCY FOR EDUCATION



Ministry of
Education
and Culture

The Finnish National Agency for Education
Ministry of Education and Culture
2018

This referencing report was prepared jointly by the Finnish National Agency for Education and the Ministry for Education and Culture.

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Published in 2018

ISBN 978-952-13-6496-9 (pdf)

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A note on the terminology used in this report

The following terms, which are used in this report, are established and used in Finland when describing the Finnish system of education and qualifications.

Competence modules	Included in the FiNQF along with qualifications, can refer to a part of a qualification (an entity), qualification units, further training related to an eligibility, or module of studies that is a requirement for a particular profession.
Qualification	Refers to completion of a programme or demonstration of nationally defined set of competences leading to the award of a qualification or a degree.
Recognition of prior learning	Process of assessing what a person has learnt through his/her prior studies and life-long learning. The term can also be used to refer to the result, a process that is complete. In this report the term is used in the context of study.
Syllabus	For example the programme of study in nine-year basic education. The term is also used to refer to the studies completed in general upper secondary education that prepare students for the matriculation examination. A certificate is awarded on the completion of a syllabus.

Foreword

This report provides information on the Finnish National Framework for Qualifications and Other Competence Modules (FiNQF), it explains how this framework was prepared over the years, describes the qualifications referenced to the national qualifications framework, and most importantly provides evidence on how the FiNQF is referenced to the European Qualifications Framework for Lifelong Learning (EQF) and self-certified to the Framework for Qualifications of the European Higher Education Area, the EHEA Qualifications Framework.

The report is intended as a single comprehensive, yet concise, description about the referencing and self-certification processes. The report was prepared by the Finnish National Agency for Education which has functioned as the EQF National Co-ordination Point (EQF NCP) since 2008, and is a member of the National Correspondents for Qualifications Frameworks (EHEA Qualifications Framework) network. The report has been finalised with and approved by the Ministry of Education and Culture.

The report was presented in the EQF Advisory Group meeting held on 12 December 2017 in Brussels. This is a revised version of the report that considers the comments given in the meeting, as well as those submitted before and afterwards.

1 Background and introduction

The Finnish National Framework for Qualifications and Other Competence Modules (FiNQF) was formally adopted on 1 March 2017. On this date, the Law and the Decree governing the FiNQF entered force, which marked a formal culmination of the work towards a national qualifications framework. In fact, much had been done before; the Government committed to the preparation of a national qualifications framework in 2008 and since then Finland has been actively involved in international discussions and co-operation on qualification frameworks.

Developments within the Finnish system of the education have for long been parallel with the objectives of the European Qualifications Framework; vocational competence-based qualifications were introduced in the mid-1990s and learning outcomes based vocational qualifications in the late 1990s. Also, other purposes of the qualifications framework were already familiar and had been promoted earlier, before the European Qualifications Framework (EQF) was introduced. In relation to educational pathways within the Finnish education system, vocational qualifications have given access to all forms of higher education since the late 1990s, and for decades the Finnish education and qualifications system has been designed so that there are no dead ends. As for higher education, Finland has actively and at an early stage implemented what was agreed in the Bologna Process. This applies especially to the three-cycle degree structure, credits' ECTS compatibility, Diploma Supplement and quality assurance matters. The shift towards learning outcomes in higher education has been slower than in other sectors of education in Finland, but the progression has been systematic and it has intensified during the last years.

In 2004, the Ministry of Education and Culture¹ set up a working group whose task was to draw up a clear and transparent description of the Finnish higher education degrees - a qualifications framework. The proposed framework described Finnish higher education qualifications in terms of their work load, level, learning outcomes as well as the eligibility provided for further study. The learning outcomes were divided into knowledge, which was examined in terms of breadth and depth; language and communication skills; and competence, comprising cognitive, professional and ethical competence. Later this work was integrated to the development of a national qualifications framework comprising all qualification levels in the Finnish education system.

In 2008, the Ministry of Education and Culture appointed a committee to prepare a proposal for the national qualifications framework (NQF), define its levels in terms of learning outcomes, and determine the criteria according to which qualifications should be placed at different levels of the national and European qualifications frameworks. In addition, the

¹ In 2010, the Ministry of Education was renamed Ministry of Education and Culture to better reflect its field of operation. For reasons of clarity, the present names for the ministries are used throughout this report.

committee was expected to propose how the national qualifications framework ought to be maintained, updated and developed, and describe how quality assurance will be organised. The committee also had to prepare a proposal on whether the national qualifications framework could be extended to cover all learning, in addition to qualifications.

This committee had a wide representation of relevant stakeholders, including different ministries, education and training providers, higher education institutions, rectors' conferences, headmasters' association, adult education representatives, student organisations representing different educational levels, Association of Finnish Local and Regional Authorities as well as social partners. Representatives in charge of qualifications not governed by the Ministry of Education and Culture also participated in the work of the committee.

In its report given in June 2009 (Ministry of Education, 2009), the committee made proposals which formed the basis for legislation adopted at the beginning of 2017. The most important proposals concerned the number of levels (eight) in the framework, level descriptors with a holistic approach to learning outcomes (meaning that no explicit distinction between knowledge, skills and competence is made), a proposal for the placement of qualifications to the framework, the decision to use the best fit approach, and the plan to extend the scope of the qualifications framework in the second stage of work. The report also proposed that the national qualifications framework should include qualifications which are awarded outside the administrative sector of the Ministry of Education and Culture.

The process of preparing and adopting the national qualifications framework was long and included three Government Proposals for an act and decree. The proposals given in 2010 and 2012 both lapsed. The third proposal, which was approved by the Parliament, made use of the work done towards the previous proposals but included some updates and revisions proposed by a committee that had been appointed by the Ministry of Education and Culture. The committee consisted of officials from the Ministry of Education and Culture and the Finnish National Agency for Education and its tasks were to revise and update the content of the previous proposal to reflect the current situation and the changes made to the qualifications.

In autumn 2016, the Ministry of Education and Culture invited formal feedback on the revised report from all stakeholders and almost 90 opinions were submitted.² The feedback received was very positive and indicated that there is a need for this framework. In most responses, it was considered important to emphasise the learning outcomes based approach and to open the framework in a later stage to include also other competence modules. Based on the feedback received, some changes were also made to the level descriptors.

The following table shows the placement of syllabi and qualification to the National Qualifications Framework levels as determined in the Government Decree. The national legislation defines the level and status of several qualifications, governed by other

² The ministry invited feedback also on the previous proposals of 2010 and 2012.

administrative sectors, in relation to Ministry of Education and Culture governed ones. For this reason, individual qualifications are named in the table only when necessary. As an example, the degree of Bachelor of Policing Studies is defined by a decree as comparable to a bachelor's degree awarded by a university of applied sciences.³

³ Defined by the Decree on the Higher Education Degree System 464/1998

Qualifications and syllabi placed at FiNQF levels

1	
2	Basic education certificate / syllabus
3	
4	General upper secondary education certificate / syllabus Matriculation examination Upper secondary vocational qualifications Further vocational qualifications Basic Examination in Prison Services Fire Fighter Qualification Emergency Response Centre Operator Qualification
5	Specialist vocational qualifications Sub-Officer Qualification (Fire and Rescue Services) Vocational Qualification in Air Traffic Control
6	Bachelor's degrees (universities of applied sciences) Bachelor's degrees (universities)
7	Master's degrees (universities of applied sciences) Master's degrees (universities)
8	Universities' and the National Defence University's scientific and artistic postgraduate degrees (licentiate and doctor degrees) the General Staff Officer's Degree Specialist Degree in Veterinary Medicine Specialist training in medicine Specialist training in dentistry

Table 1. Qualifications and syllabi referenced to the Finnish National Framework for Qualifications and Other Competence Modules.

The aim of this report is to respond to the criteria and procedures set for the referencing of a national qualifications framework to the European Qualifications Framework, as well as to the criteria and procedures for self-certification as agreed in the European Qualifications Framework Advisory Group and in the framework of the Bologna Process, the Framework for Qualifications of the European Higher Education Area, respectively.

The Ministry of Culture and Education has assigned the tasks of the EQF National Co-ordination Point to the Finnish National Agency for Education. The Finnish National Agency for Education is a central government specialist agency for the development and administration of

education, which functions under the Ministry of Education and Culture. Its areas of responsibility are inherently connected to the objectives of the qualifications frameworks. The tasks of the National Co-ordination Point in maintaining, disseminating information about and developing the qualifications framework are discussed later, especially in chapter 4.

2 Finnish education system and qualifications referenced to the FiNQF

For the main part, the national education system of Finland comprises qualifications and syllabi that are governed by the Ministry of Education and Culture. In addition, there are few qualifications that fall under other administrative sectors, namely the Ministry of Defence and the Ministry of Interior. The National Framework for Qualifications and Other Competence Modules (FiNQF) adopted in 2017 encompasses only these qualifications.⁴

Obviously, the education and qualifications system in Finland is not limited to these qualifications and syllabi - there are various kinds of qualifications provided outside this setting: there exists many types of education and training of varying extent and function, such as preparatory training preceding the completion of a qualification or syllabus, further training which can be related to the eligibility and qualifications requirements for a particular profession, and competence modules which are aimed at holders of a degree.

The government proposal, approved by the parliament defines the scope of the legislation enacted. In the act, qualifications referenced to the framework are defined as qualifications and syllabi governed by the Ministry of Education and Culture and other administrative sectors. In addition, the act may be applied to modules that are “comparable with qualifications or other extensive competence modules, which have learning outcomes defined in an act and which have been specified as eligibility or qualification requirement, or which are otherwise related to development of competence and professional skill”.

The reason why the scope of the framework was confined this way, was that the committee that prepared the draft for a qualifications framework recommended focusing on qualifications that are determined in national legislation, besides which there was a consensus that qualifications of the same type and level should be included exhaustively and as an entity. The reference to competence modules serves as a road map for developing and expanding the framework.

The report at hand describes only the qualifications that are currently referenced to the National Framework for Qualifications and Other Competence Modules (FiNQF). Information about these qualifications and syllabi is provided in this chapter.

⁴ The self-governing province of Åland Islands is autonomous in education matters and their qualifications are not included in the FiNQF.

The diagram on the education system of Finland on the following page illustrates how the Ministry of Education and Culture governed qualifications and syllabi relate to each other and describes how a person can proceed in his or her studies.

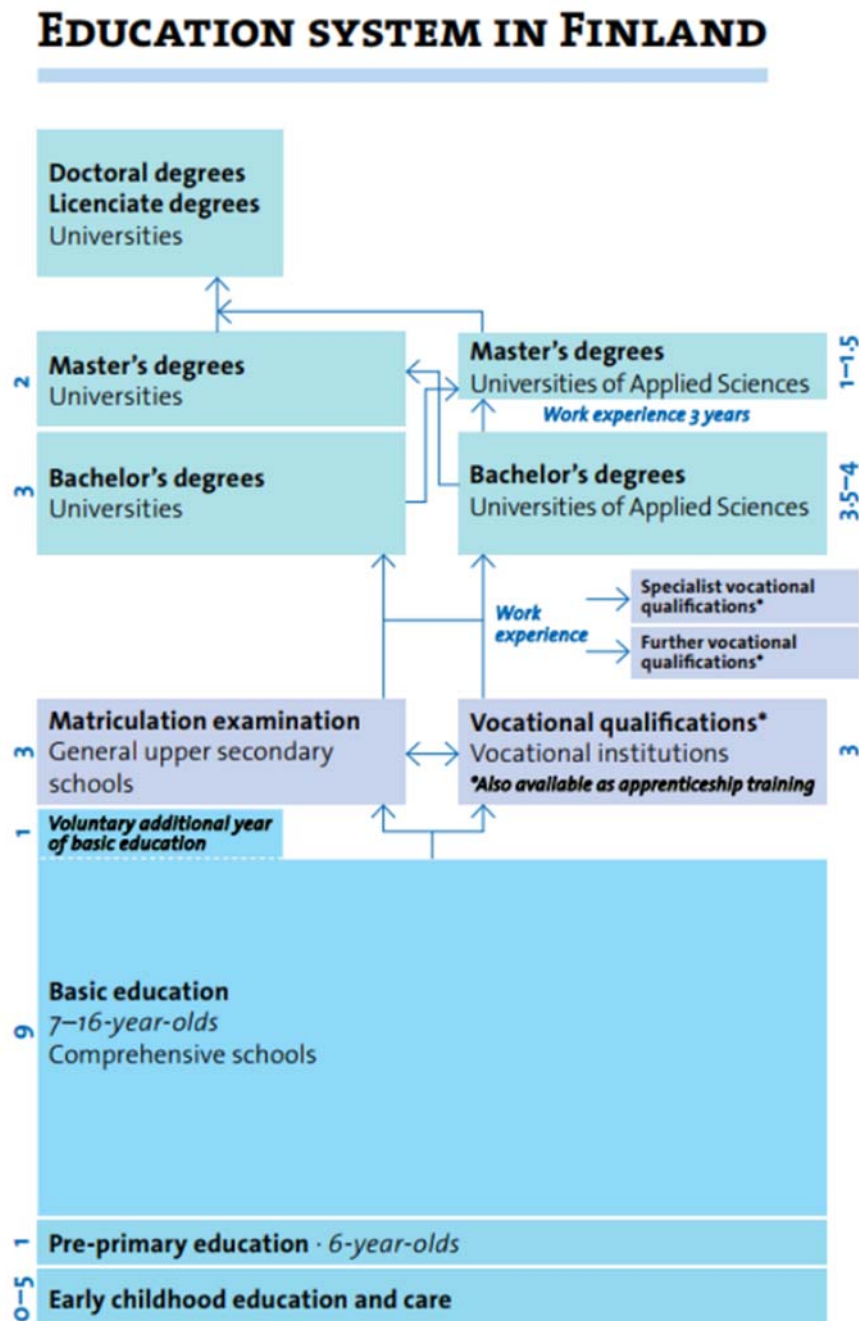


Diagram 1: Finnish Education System (Ministry of Education and Culture)

As shown in this diagram, the Finnish education system allows for flexible study paths. Within this system, it is possible to proceed from academically oriented studies to vocationally oriented studies and vice versa. The possibility of continuing one's studies irrespective of the qualification completed, has been a clear guideline in developing the national education

system and system of qualifications in the past decades. This principle is reflected in the way qualifications are comprised, the learning outcomes produced, as well as the regulations on access to further studies.

As a clarification to the access requirements to master's degree studies at universities of applied sciences, three years of work or artistic experience is always required of bachelor degree holders regardless of whether the degree is obtained from a university or a university of applied sciences. Another important feature that this diagram does not illustrate is that the further vocational qualifications and specialist vocational qualifications provide general eligibility to apply to universities or universities of applied sciences⁵.

All the qualifications and syllabi⁶ described in the following sections, 2.1 and 2.2, are regulated by national legislation. The acts and decrees regulating these qualifications are provided in Annex 3. Section 2.1 encompasses the qualifications and syllabi governed by the Ministry of Education and Culture and section 2.2 qualifications governed by the other Ministries.

2.1 Ministry of Education and Culture governed qualifications and syllabi

This chapter provides short descriptions of the qualifications and syllabi which are referenced to the Finnish National Framework for Qualifications and Other Competence Modules (FiNQF) at this stage. The learning outcomes of these qualifications and syllabi are described in chapter 4.

2.1.1 Basic education

Nine-year basic education syllabus is compulsory education provided to pupils aged 7-16. Children can either complete this compulsory schooling by participating in basic education, or by acquiring equivalent knowledge in some other way. Basic education is preceded by one year of pre-primary education, which was made compulsory in autumn 2015. In grades 1-6 pupils are mainly taught by a primary school teacher (class teacher) and in grades 7-9 by subject teachers. Pupils may, if they wish to, participate in an additional tenth year of basic education which is designed to enhance their entry into further study.

The education providers draw up their own curricula that are based on the national core curricula, which is prepared by the Finnish National Agency for Education. The subjects and themes taught in basic education and the distribution of lesson hours between the subjects

⁵ This is stipulated in the Universities Act 558/2009 and the Universities of Applied Sciences Act 932/2014.

⁶ Syllabus refers to the studies that the nine-year basic education comprises and the studies that students in general upper secondary education are required to complete. Certificates are issued upon completion of these syllabi. The term syllabus (*oppimäärä / lärokurs*) is used in this report in conjunction with the term qualification (*tutkinto / examen*), because descriptions of the Finnish education system use this term and in certain contexts distinction between qualification and syllabus is necessary.

are determined by a Government Decree. The decree also specifies objectives for basic education such as supporting the pupils' growth into active and ethical citizens, providing them with an all-round education and skills needed for life, and promoting lifelong learning and equality in education. A pupil who has completed the entire syllabus receives a basic education certificate.

FiNQF Level

The basic education certificate / syllabus is referenced at level 2 of the FiNQF.

2.1.2 General upper secondary education and the matriculation examination

General upper secondary education builds on the compulsory nine-year basic education syllabus. General upper secondary education is non-vocational, all-round education which prepares for the matriculation examination. The objectives of general upper secondary education are determined by a Government Decree. The objective is to broadly develop the students' capabilities in adopting, combining, and using acquired knowledge and skills, also across subject boundaries.

The Finnish National Agency for Education prepares the national core curriculum for general upper secondary education which determines the more specific objectives and the core content of different subjects, subject groups and cross-curricular themes in general upper secondary education.

The extent of the general upper secondary school syllabus is three years. Students can, however, complete the required courses in two to four years' time. At the end of general upper secondary education, students take the matriculation examination, which is used to assess whether they have acquired the knowledge and skills in accordance with the upper secondary school curriculum and achieved a sufficient level of maturity. Besides students who are in general upper secondary education, the matriculation examination can be taken by candidates who have completed the required, compulsory courses in the subjects they wish to take the tests in (e.g. students in vocational upper secondary education wishing to take the matriculation examination test in mother tongue or some other subject). The matriculation examination is a national examination offered twice a year and governed by the Matriculation Examination Board, which is a separate body functioning under the auspices of the Ministry of Education and Culture.

The matriculation examination comprises always a minimum of four tests. This set of tests includes mother tongue (Finnish/Swedish) and at least three of the following subjects: second national language; foreign language; mathematics and general studies battery of tests (sciences and humanities). In mathematics, foreign language, and the second national language, tests can be taken at different levels of difficulty. There are over 30 subjects in which the matriculation examination can be taken.

The general upper secondary school syllabus and the matriculation examination prepare students for further study. Students who have completed the entire syllabus receive a general upper secondary school certificate issued by the general upper secondary school. Students who have successfully completed the matriculation examination receive a matriculation examination certificate which is issued by the Matriculation Examination Board.

Completing both the general upper secondary school syllabus and the matriculation examination provides the student with general eligibility to apply to universities or universities

of applied sciences. The general upper secondary school certificate alone gives eligibility to apply to universities of applied sciences. The matriculation examination test results are widely used by higher education institutions in student admission. An applicant to higher education studies may receive additional points based on the matriculation examination tests she or he has completed, considering the subjects chosen, level of the tests taken and grades achieved.

FiNQF Level

The general upper secondary education certificate / syllabus and the matriculation examination are both referenced at level 4 of the FiNQF.

2.1.3 Vocational qualifications

The objectives for vocational education and training as well as vocational qualifications are determined by national legislation. These objectives depend on the type of education and type of qualification; the ones determined for vocational upper secondary qualifications are distinct from those determined for further qualifications and specialist qualifications. The Ministry of Education and Culture regulates the qualification structure, decides on the qualifications and the competence areas that belong to qualifications. The qualification specific learning outcomes are determined in the qualifications requirements which are prepared by the Finnish National Agency for Education.

Vocational upper secondary education and training is initial vocational education and training (IVET). It is regulated by the Vocational Education and Training Act (630/1998). It provides students with the knowledge and skills necessary for completing a vocational upper secondary qualification and capabilities for self-employment. It also aims to support the students' development into good and balanced persons and members of the society, as well as to provide them with knowledge and skills necessary for further studies, vocational development, personal interests and versatile development of their personalities.

Education and training leading to vocational upper secondary qualifications is provided mainly by vocational institutions, but also apprenticeship training is offered. All school-based VET includes at least 30 competence points of on-the-job learning. To acquire a vocational upper secondary qualification, the student can either complete a programme and skills demonstrations provided by a vocational institution or take the competence tests that are required. VET provider licensed by the Ministry of Education and Culture award a qualification certificate to students mentioned before. Competence-based qualifications regulated by the Vocational Adult Education Act (631/1998) are awarded by the sectoral Qualification Committees who also assess the tests taken by the candidate. The qualification provides the same professional and academic rights regardless of the method of completion.

When a vocational upper secondary qualification is completed at a vocational institution the extent of the qualification is described in terms of ECVET compatible credits, 180 competence points (*osaamispiste / kompetenspoäng*) and the nominal duration of study is three years. Students can, however, complete the qualification in shorter or longer time. School-based vocational upper secondary qualifications consist of vocational units (135 competence points), common/core units (35 competence points) and free-choice units (10 competence points). Vocational qualifications completed as a competence based qualification are currently not described in terms of competence points nor are they assigned a nominal duration. Competence-based qualifications comprise only vocational units.⁷

⁷ The apprenticeship students also complete their qualifications by taking competence based tests.

Vocational upper secondary education and vocational qualifications are closely linked to the needs of working life and the legislation requires co-operation between VET providers, businesses and other sectors of working life. All vocational qualifications and the vocational education and training at vocational institutions are designed, planned, provided, assessed and developed in close co-operation with the business and working life.

This strong link between vocational education and training and the world of work is demonstrated in the qualification requirements and in the assessment of learning outcomes. Whether the students have acquired the vocational skills needed in working life is typically assessed in real working life situations at the workplace. Students demonstrate their vocational skills by completing practical tasks which are assessed by representatives of education provider and world of work together. Assessors consider how well the student has acquired the skills needed in working life. There are several assessments like this during the programme of study.

There are three types of competence-based vocational qualifications. Listed in the order of increasing level of difficulty, these qualifications are the upper secondary vocational qualification, further vocational qualification and specialist vocational qualification. Compared to the vocational upper secondary qualification, the further vocational qualification is a more specialised qualification. A further qualification comprises solely of vocational units. In terms of learning outcomes, there are differences between upper secondary vocational qualifications and further vocational qualifications, but according to the detailed review of further vocational qualifications and the best fit principle, these qualifications have been placed at the same level in the FINQF. The last-mentioned qualification type, specialist vocational qualifications, indicate command of the most demanding tasks and require special expertise in the field.

The learning outcomes that specialist vocational qualifications produce, are distinct from those provided by upper secondary vocational qualifications and further vocational qualifications. Based on the holistic review of the specialist vocational qualifications' learning outcomes, conducted when the placement of qualifications to framework levels was prepared, these learning outcomes correspond to the level descriptors on level 5.

The sector specific Qualification Committees that organise, supervise and assess competence-based qualifications include members who represent entrepreneurs and businesses in the field concerned. In addition, the committee members include teachers, experts, representatives of workers' unions and employer organisations.

Competence-based qualifications are independent of the way the vocational skills have been acquired. The student demonstrates his/her acquired competence by taking competence tests. Nevertheless, competence tests are mainly completed in connection with preparatory training. Preparatory training leading to further vocational qualifications and specialist vocational qualifications is continuing vocational education and training (CVET). Further vocational qualifications and specialist vocational qualifications can only be completed as competence-

based qualifications. The qualifications are awarded by the sectoral Qualification Committees who also confirms the assessment of the competence tests taken by the candidate.

Students who have successfully completed a vocational qualification receive a qualification certificate. Certificates may also be provided for completed qualification units upon request. Each vocational qualification is prepared a Certificate Supplement that the graduate can download from the National Europass Centre website (europassi.fi), in addition the education providers who provide vocational upper secondary education and training are obliged by law to issue the Certificate Supplement upon the student's request.

Vocational upper secondary qualifications, further vocational qualifications and specialist vocational qualifications provide general eligibility to apply to universities and universities of applied sciences. The academic and professional rights that the qualification provides are the same irrespective of the way in which the qualification is completed.

FiNQF Level

Vocational upper secondary qualifications (*ammattillinen perustutkinto / yrkesinriktad grundexamen*) are referenced at level 4 of the FiNQF.

The only qualification that is an exception to this rule is the Vocational Upper Secondary Qualification in Air Traffic Control (*lennonjohdon perustutkinto / grundexamen i flygledning*) which is referenced at level 5 of the FiNQF. The justifications for this exception are that a prerequisite for taking this qualification is an upper secondary qualification, and due to international regulations, the vocational skill requirements are more stringent than those in other vocational upper secondary qualifications or further qualifications. In accordance with the best fit principle, the learning outcomes of this qualification correspond to level 5 descriptors.

All further vocational qualifications (*ammattitutkinto / yrkesexamina*) are referenced at level 4 and all specialist vocational qualifications (*erikoisammattitutkinto / specialyrkesexamina*) at level 5 of the FiNQF.

2.1.4 Higher education degrees

The Finnish higher education system consists of two complementary sectors: universities (*yliopisto / universitet*) and universities of applied sciences (*ammattikorkeakoulu / yrkeshögskola*). The Finnish universities which operate in the Ministry of Education and Culture sector come under the Universities Act (558/2009). The Act lists all the universities which receive funding from the Ministry of Education and Culture and award Finnish degrees. The Finnish universities of applied sciences which operate in the Ministry of Education and Culture sector come under the Universities of Applied Sciences Act (932/2014). Universities of applied

sciences need an operating license granted by the Government to receive funding and award Finnish higher education degrees. Universities and universities of applied sciences operating under these Acts belong to the official Finnish higher education system. Currently there are 15 universities and 25 universities of applied sciences and with few exceptions, they are governed by the Ministry of Education and Culture.⁸ All bachelor's degrees awarded by these institutions give access to master's degree studies and all master's degrees to doctoral studies.

From 2005 onwards, higher education studies have been measured in credits (*opintopiste / studiepoäng*) that are fully compatible with the European Credit Transfer system, i.e. one Finnish credit corresponds to one ECTS. Since 2005, all Finnish higher education institutions have automatically issued a Diploma Supplement to those who are awarded a degree, prior to this a Diploma Supplements were issued mainly upon request. Learning outcomes provided by individual higher education qualifications may be described in Diploma Supplements.

Higher education institutions, universities and universities of applied sciences, prepare specific learning outcomes for the programmes they offer. All programmes are learning outcomes based and the higher education institutions write descriptions of the specific learning outcomes for all units of study.

Finnish higher education degrees are referenced at levels 6, 7 and 8 in the FinQF. The placement of degrees at these levels is determined by the learning outcomes of the type of qualification, and the best-fit principle.

⁸ The National Defence University is governed by the Ministry of Defence, the Police University College by the Ministry of Interior. The self-governing province of the Åland Islands, in which the Högskolan på Åland (the Åland University of Applied Sciences) is situated, has autonomy over education matters.

University of applied sciences degrees

The universities of applied sciences are higher education institutions that confer bachelor and master degrees in various fields of applied sciences. Provisions on university of applied sciences degrees, the degrees' objectives, structure of studies, and other study requirements are regulated by national legislation. Formerly the universities of applied sciences were referred to as polytechnics, but in 2016 the Ministry of Education and Culture decided that the English translation universities of applied sciences should be used also in official contexts.

Bachelor's degrees

Bachelor's degrees conferred by universities of applied sciences are first cycle higher education degrees. The required extent of studies depends on the degree – either 180, 210, 240 or 270 credits. Most bachelor's degrees have an extent of 210 or 240 credits which is equivalent to 3.5 and 4 years of study, respectively. The studies comprise core and professional studies, elective studies, work placement to promote professional skills, and a final project. Work placement included in the bachelor's degree accounts for at least 30 credits.

Bachelor's degrees prepare for demanding expert positions within the relevant field. The degree titles in national languages, Finnish and Swedish, always indicate the field of study that the degree belongs to and the title the graduate can use, e.g. *liiketalouden ammattikorkeakoulututkinto*, *tradenomi (AMK) / yrkeshögskoleexamen inom företagsekonomi*, *tradenom (YH)*; the English translation for this degree is Bachelor of Business Administration. A general term used to refer to bachelor's degrees completed at a university of applied sciences is *ammattikorkeakoulututkinto / yrkeshögskoleexamen* — this term is used especially in legislation. Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by the university of applied sciences.

University of applied sciences graduates who hold bachelor's degrees have access to master's degree studies at universities and universities of applied sciences.

Master's degrees

Universities of applied sciences offer master's degrees in the same fields of study as they offer bachelor's degrees. The access requirements for master's degree studies at universities of applied sciences include a suitable bachelor's degree completed at a university of applied sciences or another suitable higher education degree, and three years of professional experience or artistic work experience.

Master's degrees conferred by universities of applied sciences are second cycle higher education degrees. The required extent of studies is either 60 or 90 credits, depending on the degree. The studies are often completed as part-time study. The studies comprise advanced professional studies, elective studies, and a final project.

Master's degrees prepare for functioning in demanding expert and managerial positions within the relevant field. The degree titles in national languages, Finnish and Swedish, always indicate the field of study that the degree belongs to and the title the graduate can use, e.g. *matkailu- ja ravitsemisalan ylempi ammattikorkeakoulututkinto, restonomi (ylempi AMK)/ högre yrkeshögskoleexamen inom turism- och kosthållsbranschen, restonom (högre YH)*; the English translation for this degree is Master of Hospitality Management. A general term used to refer to master's degrees completed at a university of applied sciences is *ylempi ammattikorkeakoulututkinto / högre yrkeshögskoleexamen* — this term is used especially in legislation. Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by the university of applied sciences.

University of applied sciences graduates who hold master's degrees have access to postgraduate studies i.e. third cycle studies, which are offered at universities.

FiNQF Level

Bachelor's degrees conferred by universities of applied sciences (*ammattikorkeakoulututkinnot, AMK / yrkeshögskoleexamina, YH*) are referenced at level 6.

This placement also applies to the degrees of Bachelor of Police Services (*poliisin ammattikorkeakoulututkinto, poliisi (AMK) / yrkeshögskoleexamen för polis, polis (YH)*) and Bachelor of Engineering (*tekniikan ammattikorkeakoulututkinto, insinööri (AMK) / yrkeshögskoleexamen inom teknik, ingenjör (YH)*) completed in the field of fire and rescue services, described in chapters 2.2.3 and 2.2.4.

Master's degrees conferred by universities of applied sciences (*ylemmät ammattikorkeakoulututkinnot, ylempi AMK / högre yrkeshögskoleexamina, högre YH*) are referenced at level 7.

This placement applies also the degree of Master of Police Services (*poliisin ylempi ammattikorkeakoulututkinto, poliisi (ylempi AMK) / högre yrkeshögskoleexamen för polis, polis (högre YH)*) described in chapter 2.2.3.

University degrees

Universities confer bachelor's and master's degrees and academic, artistic and professional postgraduate degrees. National legislation gives detailed provisions on university degrees, the degrees' objectives, the structure of studies, and other study requirements. University degrees are academically oriented, but some programmes do also prepare for the pursuit of a specific profession (such as dentist, veterinary surgeon, pharmacist etc.).

Bachelor's degrees

Bachelor's degrees offered at universities are first cycle higher education degrees with an extent of no less than 180 credits, which is equivalent to three years of full-time study. The required extent of studies for the degree of Bachelor of Fine Arts is 210 credits. Studies leading to bachelor's degrees offered at universities may include basic and intermediate studies, language and communication studies, interdisciplinary programmes, other studies and work practice for professional development. The degree includes a bachelor's thesis with an extent of 6-10 credits.

In most fields of study bachelor's degrees completed at a university are referred to with the term *kandidaatin tutkinto / kandidatexamen*. Certain fields, such as Law and Pharmacy, have divergent titles.⁹ The specific degree titles indicate the field of study on a general level, e.g. *luonnontieteiden kandidaatin tutkinto / kandidatexamen i naturvetenskapen*; the English translation for this degree is Bachelor of Science. A general term *alempi korkeakoulututkinto / lägre högskoleexamen* is used to refer to all bachelor level degrees issued by Finnish universities — this term is used especially in legislation. Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by the university.

University graduates who hold bachelor's degrees have access to master degree studies at universities and universities of applied sciences.

Master's degrees

Master's degrees offered at universities are second cycle higher education degrees with an extent of no less than 120 credits, which is equivalent to two years of full-time study. The degrees of Master of Science in Psychology, Master of Art in Music and Licentiate of Odontology require 150 credits. Studies leading to master's degrees offered at universities may include: basic and intermediate studies and advanced studies; language and communication studies; interdisciplinary study programmes; other studies; and internship improving expertise. The degree includes a master's thesis with an extent of 20-40 credits.

⁹ In the field of Law, the title for a bachelor's degree is *oikeusnotaari / rättsnotarie*, and in Pharmacy, *farmaseutti / farmaceut*.

As an exception to the three-cycle structure of Finnish higher education, in the fields of medicine and dentistry a bachelor's degree is generally not awarded and the studies leading to a master-level degree are organised as a programme with an extent of 360 credits (6 years) and 330 credits (5½ years), respectively.

In most fields of study master's degrees completed at a university are referred to with the term *maisterin tutkinto / magisterexamen*, e.g. *kasvatustieteen maisterin tutkinto / pedagogie magisterexamen*; the English translation for this degree is Master of Arts (Education). Certain fields have divergent titles¹⁰. A general term *ylempi korkeakoulututkinto / högre högskoleexamen* is used to refer to all master level degrees issued by Finnish universities — the term is used especially in legislation. Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by the university.

University graduates who hold master's degrees have access to postgraduate studies i.e. third cycle studies, which are offered at universities.

Postgraduate degrees

The degrees of doctor and licentiate are scientific and artistic postgraduate degrees, third cycle degrees. The Specialist Degree in Veterinary Medicine is a third cycle professional postgraduate degree. The legislation does not specify the extent of studies required for these degrees, but does give other provisions.

A student admitted to postgraduate studies may be awarded a licentiate's degree after he or she has completed the part of the postgraduate studies, and the specialisation studies if included in the degree, as determined by the university. A licentiate's thesis is also required for the award of this degree - however in the field of music and the field of theatre and dance, the degree may include public demonstrations of knowledge and skills, instead of a licentiate's thesis.

The requirements for the degree of doctor include that the student admitted to postgraduate studies completes the required postgraduate studies; demonstrates independent and critical thinking in the field of his/her research, and writes a doctoral dissertation and defends it in public or, in certain fields, demonstrates the knowledge and skills in public in accordance with the university's requirements.

¹⁰ In Veterinary Medicine *eläinlääketieteen lisensiaatin tutkinto / veterinärmedicine licentiatexamen*, in Pharmacy *proviisorin tutkinto / provisorexamen*, in Dentistry *hammaslääketieteen lisensiaatti / odontologie licentiatexamen*, in Medicine *lääketieteen lisensiaatin tutkinto / medicine licentiatexamen*, in Architecture *arkkitehdin tutkinto / arkitektexamen*, in Engineering *diplomi-insinöörin tutkinto / diplomingenjörexamen*, and in Landscape Architecture *maisema-arkkitehdin tutkinto / landskaparkitekstexamen*.

In most fields, the term *lisensiaatin tutkinto / licentiatexamen* is used to refer to a scientific or artistic post-graduate degree that can be taken after a master's degree. However, in the fields of Medicine, Dentistry and Veterinary Medicine this title (licentiate) refers to a master-level degree and it is not to be confused with the third cycle degree of Licentiate offered in other fields. Doctor's degrees are referred to with the term *tohtorin tutkinto / doktorexamen*. The actual degree titles indicate the field of study, e.g. *oikeustieteen lisensiaatin tutkinto / juris licentiatexamen*; in English Licentiate of Laws, and *musiikin tohtorin tutkinto / musikdoktorexamen*; in English Doctor of Music. Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by the university.

FiNQF Level

Bachelor's degrees conferred by universities (*alemmat korkeakoulututkinnot / lägre högskoleexamina*) are referenced at level 6 of the FiNQF.

Master's degrees conferred by universities (*ylemmät korkeakoulututkinnot / högre högskoleexamina*) are referenced at level 7 of the FiNQF.

Doctor's degrees (*tohtorin tutkinnot / doktorsexamina*) and third cycle licentiate's degrees (*lisensiaatin tutkinnot / licentiatexamina*) conferred by universities and the National Defence University are referenced at level 8 of the FiNQF.

Also, the Specialist Degree in Veterinary Medicine, General Staff Officer's Degree and specialist training in medicine and dentistry are referenced at level 8 of the FiNQF.

2.2 Other administrative sectors' qualifications

In addition to the qualifications and syllabi that are governed by the Ministry of Education and Culture, the FiNQF encompasses qualifications that fall under other administrative sectors, namely the Ministry of Defence and the Ministry of Interior. The qualifications referenced to the framework include qualifications in the fields of defence administration, prison and probation services, police services, fire and rescue services and emergency response centre operations. In the national education system, these qualifications are either vocational qualifications or higher education degrees.

The way these qualifications relate to the Ministry of Education and Culture governed ones is determined by and large in national legislation. The vocational qualifications included in the national qualifications framework are classified as vocational qualifications in the decrees and acts regulating them, and the status and level of all Finnish higher education degrees is defined in the Decree on the Higher Education Degree System (464/1998).

2.2.1 National defence qualifications

Qualifications in the field of national defence that are referenced to the FiNQF are conferred by the National Defence University. The degrees awarded by this university are Bachelor, Master and Doctor of Military Science, and General Staff Officer's Degree. Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by the National Defence University.

FiNQF Level

Bachelor's degrees conferred by universities (*alemmat korkeakoulututkinnot / lägre högskoleexamina*), including the Bachelor of Military Science conferred by the National Defence University, are referenced at level 6 of the FiNQF.

Master's degrees conferred by universities (*ylemmät korkeakoulututkinnot / högre högskoleexamina*), including the Master of Military Science conferred by the National Defence University, are referenced at level 7 of the FiNQF.

Doctoral degrees awarded by universities, including the General Staff Officer's Degree and Doctor of Military Science conferred by the National Defence University are referenced at level 8 of the FiNQF.

2.2.2 Prison and probation service qualifications

Training Institute for Prison and Probation Services provides vocational training for supervisory and control duties within the prison services (prison officer posts). The aim of the Basic Examination in Prison Services is to provide students with practical basic knowledge and skills for carrying out goal-oriented, safe and effective supervisory and control duties within the prison services in a manner that respects the dignity and rights of everyone. Students who have successfully completed the Basic Examination in Prison Services, receive a qualification certificate.

The Training Institute for Prison and Probation Services and the Laurea University of Applied Sciences collaborate in providing a Bachelor's degree programme in social services with a specialisation in correctional services. The programme leads to a Bachelor's degree in Social Services (*sosiaali- ja terveystieteiden ammattikorkeakoulututkinto, sosionomi (AMK) / yrkeshögskoleexamen inom social- och hälsoområdet, socionom (YH)*) which is conferred by Laurea University of Applied Sciences. Upon graduation from the Bachelor's degree programme in social services with a specialisation in correctional services, the student receives a degree certificate, a transcript of records and a Diploma Supplement. These documents are issued by Laurea University of Applied Sciences.

FiNQF Level

The Basic Examination in Prison Services (*rikosseuraamusalan tutkinto / examen inom brottsförundersökningsområdet*) is referenced at level 4 of the FiNQF.

The Bachelor of Social Services degree is referenced at level 6 of the FiNQF.

2.2.3 Qualifications in police services

The Police University College is a university of applied sciences that is subordinate to the Ministry of Interior. The Police University College provides studies in the field of internal security and confers the degrees of Bachelor of Police Services (*poliisin ammattikorkeakoulututkinto, poliisi (AMK) / yrkeshögskole-examen för polis, polis (YH)*) and Master of Police Services (*poliisin ylempi ammattikorkeakoulututkinto, poliisi (ylempi AMK) / högre yrkeshögskoleexamen för polis, polis (högre YH)*). Upon graduation, the student receives a degree certificate, a transcript of records and a Diploma Supplement.

FiNQF Level

The Bachelor of Police Services is referenced at level 6 of the FiNQF.

The Master of Police Services is referenced at level 7 of the FiNQF.

2.2.4 Qualifications in fire and rescue services and emergency response centre operations

The Emergency Services College functions under the auspices of the Ministry of Interior and provides education and training leading to the qualifications of fire fighter, sub-officer and the emergency care centre operator. The college awards these qualifications.

The Savonia University of Applied Sciences and the Emergency Services College collaborate in providing a degree programme for fire officers. The Savonia University of Applied Sciences ¹¹ awards the Bachelor of Engineering (*tekniikan ammattikorkeakoulututkinto, insinööri (AMK) / yrkeshögskoleexamen i teknik, ingenjör (YH)*). Upon graduation from the student receives a degree certificate, a transcript of records and a Diploma Supplement.

FiNQF Level

The fire fighter qualification (*pelastajatutkinto/räddningsmannalexamen*) and the qualification of emergency response centre operator (*hätäkeskuspäivystäjätutkinto/examen för jourhavande vid nödcentraler*) are referenced at level 4 of the FiNQF.

The sub-officer qualification (*alipäällystötutkinto/underbefälsexamen*) is referenced at level 5 of the FiNQF.

Bachelor of Engineering (*tekniikan ammattikorkeakoulututkinto, insinööri (AMK) / yrkeshögskoleexamen i teknik, ingenjör (YH)*) is referenced at level 6 of the FiNQF.

¹¹ Starting from 1.1.2017, the awarding body for the degree has been the Police University College, and a new degree title Bachelor of Rescue Services (*pelastusalan ammattikorkeakoulututkinto, pelastusalan päällystötutkinto (AMK) / yrkeshögskoleexamen för räddningsbranschen, befälsexamen för räddningsbranschen (YH)*) is used.

3 Referencing and self-certification processes in Finland

It was decided by the Ministry of Education and Culture and the Finnish National Agency for Education that referencing the FiNQF to the EQF, and self-certifying the framework to the EHEA Qualifications Framework should be carried out as a single process. The Finnish National Agency for Education was given the task of drafting a report that would meet the requirements set for the referencing process and for self-certification.

The Ministry of Education and Culture has commented on the combined referencing and self-certification report and approved the finalised report.

3.1 Criteria for referencing qualifications frameworks to the EQF

3.1.1 Criterion 1: Responsibilities and legal competence of national authorities

The Ministry of Education and Culture is the national authority responsible for the FiNQF and the further development of this framework. The Finnish National Agency for Education is a government agency working under the Ministry of Education and Culture which the ministry has named the National Co-ordination Point (NCP) for the European Qualifications Framework.

In 2008, the Ministry of Education and Culture issued a regulation in which the following tasks were assigned to the National Co-ordination Point: participation in the development and implementation of the EQF; disseminating information to stakeholders about the EQF, the NQF and the placement of qualification to the frameworks; giving guidance and advice to stakeholders in using the qualifications frameworks; taking part in the national and international collaboration involving qualifications frameworks and promoting co-operation; other tasks assigned by the ministry. In 2009, the Ministry of Education and Culture asked the Finnish National Agency for Education to represent Finland in the network of National Correspondents for Qualifications Frameworks (EHEA Qualifications Framework).

It has been agreed between the Ministry of Education and Culture and other relevant ministries that the Ministry of Education and Culture coordinates the work involving the FiNQF, EQF and the EHEA Qualifications Framework.

3.1.2 Criterion 2: Links between the qualifications frameworks' level descriptors

Number of levels

As the starting point for its work, the working group in charge of the drafting the FiNQF studied closely the level descriptors in the EQF and considered the suitability of eight level framework in describing the national qualifications system. It was concluded that eight levels correspond well to the Finnish education system, especially when other modules of study not leading to a qualification are considered. Although for the time being the FiNQF has levels to which no qualifications have been placed at, it is highly likely that these levels will be used when the other broad competence modules are to be included in the framework. As an example, the preparatory trainings for upper secondary education for which the learning outcomes are determined on a national level, could perhaps be placed at level 3 in the FiNQF.

Thus, the working group decided to use eight levels in their proposal. In addition, it was acknowledged that the level descriptors in the EQF are general and apply to qualifications with divergent orientations and functions. For these reasons, adopting an eight-level framework as the national qualifications framework was considered both practical and an appropriate way of describing the Finnish education system and qualifications in relation to the EQF.

Descriptors and learning outcomes

FiNQF level descriptors were modelled after the EQF level descriptors, because they were considered well-suited for describing the learning outcomes of Finnish qualifications. The choice was also practical in the sense that the levels of the FiNQF correspond to the EQF levels, which makes the framework more transparent. Although the EQF level descriptors were modified and complemented to reflect certain features of the Finnish education system and qualifications, such as the emphasis on studying languages, the core of the FiNQF level descriptors does correspond to the EQF level descriptors. In the national descriptors, the key competence for lifelong learning, as defined in the Recommendation of the European Parliament and of the Council (2006), are visible. This applies especially to communication in the mother tongue and foreign language(s), learning to learn, sense of entrepreneurship and social competence, which have been implemented through national curricula in primary and secondary education.

At the beginning, when the level descriptors for a national qualification framework were first drafted, learning outcomes were divided into five areas: (1) knowledge, (2) working method and application (skill), (3) responsibility, management, entrepreneurship, (4) assessment, (5) key skills for life-long learning. Later on, the five areas were amalgamated into unified level descriptors where a distinction between the different aspects is no longer made.

In the FiNQF learning outcomes are not divided into the categories *knowledge*, *skills* and *competence* used in the EQF. One of the benefits of preparing integrated level descriptors was that learning outcomes could be described concisely. Other reasons for choosing an integrated description of learning outcomes were that distinguishing skills from competence was considered somewhat artificial, difficult and unnecessary due to language reasons, as the term used in Finnish (*osaaminen /kunnande*) covers both aspects *skills* and *competence*. All in all, a holistic approach in which the learning outcomes are not divided into knowledge, skills and competence as in the EQF, was considered more appropriate for describing Finnish learning outcomes. To ensure a transparent and true link between the EQF level descriptors and the learning outcomes of Finnish qualifications, the committee responsible for drafting the national qualifications framework requested for an analysis on how the EQF level descriptors and the EHEA Qualifications Framework descriptors correspond to the general learning outcomes objectives laid down in national legislation for qualifications of varying levels, and to the learning outcomes defined by national core curricula. The results of the comparison were that there is considerable consistency between the descriptions.

The phrasing of the learning outcomes in the FiNQF is rather general. This is because the descriptors need to facilitate various kinds of qualifications which are placed at the same level in the framework. FiNQF level descriptors are designed so that they facilitate referencing qualifications with divergent orientations, both academically and professionally oriented qualifications, to the same level of the qualifications framework. The level descriptions are broad and include learning outcomes that relate to both work and study. For example, FiNQF level 4 includes vocational upper secondary qualifications, the general upper secondary education syllabus and the matriculation examination – the first mentioned are professionally oriented qualifications and the latter more academically geared qualifications. Both the EQF and the FiNQF descriptors at levels 6 to 8 have their origins in the Dublin descriptors. In the FiNQF, these levels contain both professionally and academically oriented qualifications.

All FiNQF level descriptors refer to communication and language skills in national languages i.e. the mother tongue and second national language. The descriptions are meant to reflect the learning outcomes given in relevant regulations, for syllabi and qualifications. However, education is provided in a foreign-language at all levels of the Finnish education system and there are special provisions concerning this. The legislation also allows special consideration when the person completing a syllabus or qualification is an immigrant or a speaker of a foreign language. The qualifications completed are referenced at the same level regardless of this.

Best fit principle

The best fit principle used in the placement of qualifications to FiNQF means that qualifications are placed at the level that is overall the most suitable one. This also means that the learning outcomes of a given level may contain elements that do not reflect the learning outcomes of a

specific qualification, due to for instance the orientation of the qualification. Qualifications or competence modules placed at the same level in the FiNQF may focus on different dimensions of learning, and qualifications of the same level may differ from each other regarding their language proficiency requirements, for example.

To ensure the clarity of the education and qualifications system, qualifications of a certain type would primarily be placed at the same level in the framework. However, an individual qualification would not necessarily have to meet all elements of the level descriptors as such, and the level of individual elements could be either higher or lower, if this is justified by labour market needs in the field in question. Instead of placing parts of qualifications separately in the framework, they connect to the framework through the qualification they belong to.

The following table (Table 2) contains the level descriptions for level 6 in the EQF and the FiNQF, and allows us to examine how the level descriptors relate to each other:

EQF Level 6	FiNQF Level 6
<p><i>Knowledge:</i> <u>Advanced knowledge of a field of work or study, involving a critical understanding of theories and principles</u></p> <p><i>Skills:</i> Advanced skills, <u>demonstrating mastery and innovation</u>, required to <u>solve complex and unpredictable problems</u> in a <u>specialised field of work or study</u></p> <p><i>Competence:</i> Manage complex technical or professional activities or projects, taking responsibility for decision-making in unpredictable work or study contexts; take responsibility for managing professional development of individuals and groups</p>	<p>Has a good command of comprehensive and <u>advanced knowledge of his/her field</u>, involving a <u>critical understanding and appraisal of theories, key concepts, methods and principles</u>. Understands the extent and boundaries of professional functions and/or disciplines. Has advanced cognitive and practical skills, <u>demonstrating mastery of the issues and the ability to apply knowledge and find creative solutions</u> and applications required in a <u>specialised professional, scientific or artistic field to solve complex or unpredictable problems</u>.</p> <p>Works independently in expert tasks of the field and in international co-operation or as an entrepreneur. Manages complex professional activities or projects. Can make decisions in unpredictable operating environments. In addition to evaluating and developing his/her own competence, he/she takes responsibility for the development of individuals and groups.</p> <p>Has the ability for lifelong learning. Considers communal and ethical aspects when dealing with different people in learning and working communities and other groups and networks. Communicates to a good standard verbally and in writing in his/her mother tongue both to audiences in the field and outside it. Communicates and interacts in the second national language and is capable of international communication and interaction in his/her field in at least one foreign language.</p>

Table 2

A table showing the EQF and QF EHEA descriptors, the FiNQF descriptors and the qualifications referenced to the FiNQF side-by-side is provided in Annex 1, at the end of this report.

To sum up, the eight-level framework in which all the levels correspond to the eight levels of the EQF was considered appropriate because the qualifications system comprises qualifications that produce similar learning outcomes but the way qualifications are constructed and the positions that they prepare for in the labour market are distinct.

The level descriptors of the FiNQF are intentionally broad and general. They are not designed to describe or elaborate on specific learning outcomes. This kind of more detailed description can instead be provided in the national core curricula, qualification requirements, programme descriptions in higher education and other comparable documents, such as the Diploma and Certificate Supplements. Learning outcomes described on levels 1 and 3 of the FiNQF are less specific when compared to for example levels 2 and 4 – this is because currently there are no qualifications or syllabi referenced at levels 1 and 3. The descriptions on levels 1 and 3 can and will be made more specific if necessary, and the same applies also of course to the other levels.

3.1.3 Learning outcomes as a basis for the framework including validation (criterion 3)

The use of learning outcomes in describing what a person can do upon completion of a certain programme of study is no novelty in Finland. However, there are differences in the extent to which learning outcomes have been used in different sectors of the education system. The vocational education and training sector has been the forerunner in the use of learning outcomes - they have used them as a basis for qualification requirements, assessment etc. since the 1990s and development has consistently been towards increased emphasis on learning outcomes.

Higher education institutions, universities of applied sciences in particular, have also adopted learning outcomes to their programmes and to student assessment. The legislation governing higher education degrees provides general learning outcomes for the degrees, but the higher education institutions have moved further at their own initiative. Some universities have revised and modernised their bachelor degree programmes and are shifting towards degrees that provide broader knowledge, skills and competence. The purpose of these revisions is two-fold: learning outcomes based programmes result in increased employability of Bachelor degree holders and prepare graduates for further study in more varied master programmes, including those from a different discipline and cross-disciplinary programmes.

Although the principle is that qualifications are placed as entities, the placement of qualifications to various levels of the framework is not bound by the level of the education system that the qualification represents. Nor are framework levels reserved for a certain type or sector of qualifications. The placement of specialist vocational qualifications on FiNQF level 5 is an illustrative example of this: the learning outcomes correspond to level 5 in the FiNQF,

but the qualification is not a short-cycle higher education degree but part of Finnish vocational education system. The placement of a qualification is always determined on the basis of learning outcomes. This principle allows for divergent placement of qualifications that in the national education system represent the same level of education. One example of divergent placement is the placement of Qualification in Air Traffic Control, where an exceptional vocational upper secondary level qualification is placed at level 5 (see section 2.1.3 for details and justifications).

The FiNQF is not a credit-based qualifications framework. Although credits are allocated for most of the qualifications included in the framework, learning outcomes rather than credits were chosen as the basis for placement of qualifications. Creating a credit based framework would have required revision of the existing system of qualifications as currently there are different credit systems in use at different levels of education: in the general upper secondary education studies are measured in courses, in the vocational upper secondary education in ECVET compatible competence points and in higher education in ECTS compatible credits. More information on the credit systems used in Finland is included in chapter 2.

The framework includes also qualifications that are not measured in credits, such as the basic education syllabus and competence-based qualifications (vocational upper secondary qualifications, further vocational qualifications and specialist vocational qualifications). In addition, the use of credits in doctoral studies and specialist training in medicine and dentistry is not systematic – certain elements of the programme may be allocated a credit value, but others are not. Moreover, the amount of credits required by qualifications that are placed at the same level of the FiNQF can vary, for example the required number of credits for qualifications referenced at level 6 now ranges from 180 to 270 ECTS.

National legislation concerning all levels and sectors of education under the Ministry of Education and Culture both facilitates and guides recognition of prior learning and life-long learning. The nationally preferred term *recognition of prior learning* refers to the concept and actions that cover validation of formal, non-formal and informal learning as well as the elements as described in the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning of recognition of prior learning.

The legislation provides students the right to have their prior learning assessed and recognised at all levels and sectors of the education system. This right concerns both access to education and recognition of prior learning towards a qualification. In addition, the Finnish National Agency for Education has issued regulations and guidelines to support recognition of life-long learning in vocational education.

Moreover, higher education institutions have co-operated as an effort to create consistent procedures and develop recognition practices. Prior learning is further emphasised in recent developments within the national education system. Examples of this include the reform of

vocational education¹² and recognition of prior learning in higher education. An assessment of the current situation in the higher education institutions is being carried out by the Ministry of Education and Culture. Besides the mapping of recognition of prior learning, the government has set a target for higher education institutions to enhance flexible study paths and recognition of prior learning. In addition, the institutions will diversify their student counselling, increase collaboration with the working life and take responsibility for improving the employability of immigrants and identifying their needs for further education and competence.

Prior learning can be assessed for example on the basis of documents, portfolio or interview. The institution decides on the methodology used in the assessment and its teaching staff is responsible for the assessment of prior learning in accordance with the institutional guidelines. However, both national legislation and the qualification requirements steer the work done in institutions on recognition of prior learning. Recognition of prior learning is an integral part of assessing whether the learning outcomes have been achieved.

3.1.4 Transparency in inclusion and placement of qualifications to the FiNQF (criterion 4)

In 2008, the Ministry of Education and Culture¹³ appointed a committee to prepare a proposal on the national qualifications framework and to define its levels in terms of learning outcomes as well as to determine the criteria according to which qualifications should be placed at different levels of the national and European Qualifications Frameworks, and to propose at which levels Finnish qualifications should be placed within the frameworks. In addition, the committee was expected to propose how the national qualifications framework ought to be maintained, updated and developed, and to describe how quality assurance will be organised.

The 22 committee members represented five ministries (Ministry of Education and Culture, Ministry of Justice, Ministry of the Interior, Ministry of Defence and the Ministry of Employment and the Economy), the Finnish National Agency for Education, employers' and employees' organisations, organisations representing education providers, student organisations, the Association of Finnish Local and Regional Authorities and the Finnish Adult Education Association. This committee represented all competent authorities and almost all of the interest groups were involved, either directly or indirectly, with the education sector. In its report given in 2009, the committee proposed that the national qualifications framework should have eight levels and the qualifications would be placed at these levels according to the required learning outcomes, and qualifications that comprise elements from several reference levels, should be placed on the level that is overall most suitable, applying the best fit principle. The committee further proposed that the framework be provided for in an Act of

¹² New legislation enters force 1.1.2018 and the reform of vocational education affects students who start their studies in 2018 or later. Students admitted earlier may also transfer to the revised programme.

¹³ In 2010, the Ministry of Education was renamed Ministry of Education and Culture to better reflect its field of operation. For the purpose of clarity, the present names for the ministries are used throughout this report.

Parliament that would compile the qualifications and syllabi as they are laid down in various statutes. The proposed Act also incorporated specialist trainings for higher education degree holders. The proposed Act provided an authorisation to describe the reference levels and place qualifications, syllabi and specialist trainings for degree-holders at different reference levels, which would be determined by a Government Decree. The committee report included a proposal for placement of qualifications within the national qualifications framework.

In autumn 2010, the Ministry of Education and Culture invited feedback on the committee report from key employer and employee organisations, other ministries, the National Education and Training Committees, organisations and other bodies representing different educational sectors, the Education Evaluation Councils and higher education institutions. A total of 86 opinions were submitted. In their opinions, the submitting parties considered the committee's initial proposal as being a good point of departure for describing qualifications and other learning and developing education to focus more on learning outcomes. They regarded the preparation of a National Framework for Qualifications and Other Competence Modules as justified and the framework itself as necessary. Placement of qualifications was mostly viewed as being apt, but some problems were also perceived in terms of certain types of qualifications. Some of the stakeholders considered it important to verify the necessity and appropriateness of new legislation as part of further preparations, stating that it would not be necessary to provide for the framework through an act. All stakeholders considered it important to extend the framework to cover all learning, but some pointed out that caution should be exercised when proceeding with extension plans.

Considering the committee report and the opinions submitted on the report, a proposal for an act and related decree was drawn up at the Ministry of Education and Culture – the team working on the proposal in 2016 included a representative from the Finnish National Agency for Education. The Committee for Preparation of the National Qualifications Framework was also involved in preparing the proposal. The content of the final approved proposal largely corresponds to the prior Government proposals given to the Parliament in 2010 and 2012, which lapsed. Stakeholders were invited to comment on all government proposals. Several comments received concerned the way in which the learning outcomes describe language and communication skills. In addition, there were comments both in favour and against describing entrepreneurship in the learning outcomes. Based on the feedback, some changes were made in the learning outcomes especially regarding the language and communication skills. Regarding entrepreneurship, it was decided that the finalised level descriptors on levels 3-8 should also describe entrepreneurial skills. The comments and suggestions received from stakeholders were valuable input that was utilised in the fine-tuning of the level descriptors.

In the FiNQF, qualifications, syllabi and extensive competence modules are placed at the eight framework levels according to the learning outcomes they produce. All the qualifications, syllabi and competence modules included in the FiNQF have been examined when drafting the national qualifications framework. Based on this review, it was concluded that the learning outcomes produced by vocational qualifications of the same type were so similar that it was

appropriate to place them according to the best fit principle at the same level, i.e. vocational upper secondary qualifications and further vocational qualifications at level 4 and specialist vocational qualifications at level 5 in the FiNQF. In the current classification qualifications of the same type are referenced at the same level consistently, best fit being the overarching principle in the placement of qualifications. However, the learning outcomes remain the overriding justification when determining which level is most suitable for the qualification in question.

3.1.5 System of quality assurance and quality assurance bodies' involvement (criteria 5 & 6)

The adoption of the FiNQF does not require a separate quality assurance to be established, as the national system of quality assurance takes into consideration all the key elements of the qualifications framework. The principles of quality assurance provided in the Recommendation on the European Qualifications Framework for Lifelong Learning (EQF) are considered as part of each educational sector's quality assurance procedures and their development. Finland participates actively in European collaboration on quality assurance and acts in line with the principles of the European Standards and Guidelines and the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET). The principles of EQAVET have been considered for instance when the national quality assurance strategy for vocational education and training has been developed in co-operation with central stakeholders. Quality assurance in general education has been developed primarily on a national level even if policy makers have learned from the experiences of their peers in other countries.

The quality assurance system in education comprises national steering system for education policy, the education providers' own systems for assessment and external evaluation activities. Quality assurance involves the systematic review of educational programmes and processes to maintain and improve their quality, equity and efficiency. Quality assurance mechanisms provide data on current performance and help to identify areas of success as well as areas for improvement. The international alignments concerning quality assurance in education are reflected in the national system of quality assurance ever more than before.

In the education sector, steering consists of steering by norms, performance steering, steering by financing, assessment of education, information guidance and other administrative guidance. There are also mechanisms connected to steering such as the surveillance of legality and appeal proceedings. Legislation forms the basis for quality assurance in education and includes provisions on quality assurance of different levels and forms of education. The education providers are obliged by law to assess the education they provide and its effectiveness, and to participate in external evaluations of their operations.

The education providers have a broad mandate in matters relating to assessment and quality assurance in education. An education provider can document their quality assurance activities

as a manual for quality, but more important than the way the system is presented, is that it functions in practice and encourages systematic activity. In self-assessment processes, the most widely used approach has been sustainable assessment, such as multiple constituency, peer review and holistic quality assurance. The results of the self-assessments and external evaluations are public. In vocational education and training, local autonomy is extensive. Education providers are responsible for implementing national guidelines, practical teaching arrangements and the effectiveness and quality of the education provided. Therefore, quality assurance is mainly at the responsibility of the education providers. Higher education institutions have extensive autonomy in quality assurance matters – a more detailed description is provided in chapter 3.2.1 *Quality assurance*.

The quality assurance related to awarding of qualifications is essential from the qualifications frameworks perspective. The institutions', including higher education institutions, quality assurance systems cover also the processes linked with qualification requirements, curricula and as part of the curricula, planning the assessment of learning outcomes, how teaching is provided and results evaluated. To ensure credibility of the learning outcomes and quality on all levels of education, it has been considered important that the quality assurance links with the way learning outcomes are defined and how the achievement of those learning outcomes is assessed.

Skilled teaching staff is a central component of quality assurance. In Finland, the qualification requirements for teachers are defined in legislation and teachers' continuing professional education is well established. Special training is provided to those who work with competence-based qualifications as the quality of the process in which prior learning is recognised is paramount.

External evaluations are organised by the FINEEC, which implements thematic and systems evaluations that cover various educational levels and learning outcomes. The information accumulated as part of these processes is utilised in the developing education at a national level and in the education providers' level for example in providers' self-evaluations and the development of their activities. There are also other organisations involved in evaluations and follow-ups on quality of education such as the Finnish National Agency for Education, regional state administrative agencies, the Academy of Finland and international organisations. The Ministry of Education and Culture draws up a national assessment plan for education together with the FINEEC. The objective of the national assessment plan is to increase the effectiveness of external evaluation activities, their stability and predictability.

Same as all the other integral organisations involved in quality assurance, the FINEEC has given positive statements in all stages of developing the national qualifications framework. In its statement the FINEEC provided strong support for the proposed EQF and QF-EHEA compatible

national qualifications framework and stressed its importance for national and international comparability, clarity and transparency in education.¹⁴

The FINEEC viewed that the proposed framework is a necessity for obtaining the European objectives of moving towards learning outcomes based education and noted that the lack of a national qualifications framework had proved both cumbersome and confusing since as Finland had implemented other European transparency tools in a timely manner. The choice of having eight levels in the national qualifications framework was commended by the FINEEC. The FINEEC also noted that the higher education degrees have been aligned with the QF-EHEA cycle descriptors earlier, when the three-cycle degree structure was introduced, thus for the higher education qualifications the legislative proposal does not bring major changes to the present state.

The diagram on the following page illustrates the main elements in the national system of quality assurance in education. The diagram is a modified version of one that was published by the Ministry of Education and Culture.

¹⁴ FINEEC's statement was submitted as a response to the Ministry of Education and Culture's request for opinions on the legislative proposal for a National Qualifications Framework and Other Competence Modules on 12.9.2016.

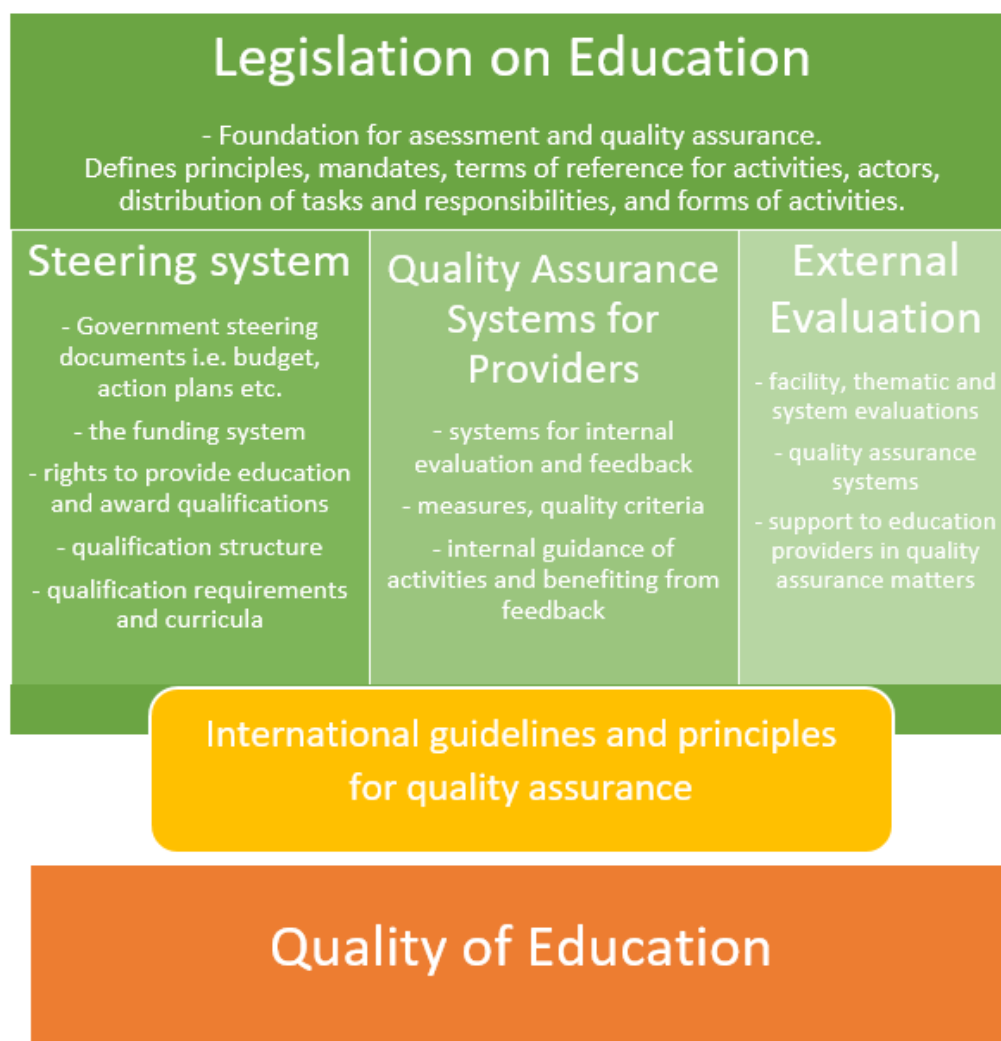


Diagram 2: Quality assurance in the Finnish education system

3.1.6 International experts (criterion 7)

The Finnish National Agency for Education was also responsible for including international experts in the process. The three international experts who were invited to comment on the process were Mr. Stefan Skimutis (former representative of the Swedish NCP, formerly employed at the Swedish National Agency for Higher Vocational Education) from Sweden, Mr. Eduard Staudecker (Member of the EQF Advisory Group, CEO of the Austrian NQF steering group, employed at the Ministry of Education and Women's Affairs in Austria) from Austria and Mr. Gunnar Vaht (Director of the Estonian ENIC/NARIC Centre, President of the Lisbon Recognition Convention Committee) from Estonia.

When selecting the international experts, the following aspects were emphasized: specialized knowledge on different sectors and levels of education, vocational education and training; familiarity with the work of the European Qualifications Framework Advisory Group; specialized knowledge on recognition of qualifications; and mobility matters. Two of the international experts come from neighbouring countries with which Finland has significant student and labour mobility (Sweden and Estonia). An additional benefit from having an

international expert from Sweden was that he was also able to comment on materials prepared in Swedish, which is the second national language in Finland.

From 2012 onwards, these experts have taken part in meetings organised by the Ministry of Education and Culture and the Finnish National Agency for Education in which the government proposals for a national qualifications framework (2012 and 2016), the qualifications and syllabi referenced to this framework, and the Finnish education system and learning outcomes of qualifications were presented and described. These meetings comprised presentations among others on the structure and composition of syllabi and various qualification types. The justifications for the scope of the qualifications framework chosen in Finland were also discussed in detail.

The last meeting with the international experts was held in 2016 at the Ministry of Education and Culture. The experts commented on the referencing of qualification to the FiNQF reflecting both on the presentations describing the qualifications system and the Government Proposal for an Act on the national qualifications framework.

In these meetings, the international experts gave suggestions on rather specific details, such as providing information about the credits, the degree and qualification titles, the educational documents received upon graduation and describing how the other administrative sectors' qualifications relate to the Ministry of Education and Culture governed, to the report. Other comments were more general, relating to for example the progression routes within the Finnish education system and the fact that though the level descriptors in the FiNQF are general, institutions do themselves prepare specific learning outcomes for the qualifications, programmes and units of study they offer.

The way level descriptors were written to facilitate placement of qualifications with differing orientations was commended by the international experts – they considered level descriptors shared by professionally and academically oriented qualifications a strength in the FiNQF.

Besides the international experts' comments, throughout the process the Finnish National Agency for Education has received valuable feedback from co-operation between Nordic Ministries of Education and National Co-ordination Points. This co-operation started in 2009 and has supported the development of national qualifications frameworks in the Nordic countries - the members of this group come from the NCP offices as well as relevant ministries in Denmark, Finland, Iceland, Norway and Sweden.

Two commentaries from the international experts involved in the referencing process are included in Annex 2.

3.1.7 Referencing report (criterion 8)

The Ministry of Education and Culture and the Finnish National Agency for Education have jointly prepared the referencing report. From early on it was decided that a single, comprehensive report would be most appropriate. The content of the report is based on the EQF referencing criteria and the criteria for self-certification to the Framework for Qualifications of the European Higher Education Area.

This combined report answers the criteria, provides information on the process of developing a national qualifications framework in Finland and the education system the framework reflects. The report has been endorsed by all relevant departments in the Ministry of Education and Culture and it has been formally approved by the permanent secretary who is the highest official at the ministry.

3.1.8 Publishing the referencing report (criterion 9)

The referencing report will be published in English and translated later into Finnish and Swedish. The report and other related documents will be made available on the European Commission's website and the ENIC-NARIC Networks' website, as required by the referencing and self-certification criteria. The Ministry of Education and Culture and the Finnish National Agency of Education will also publish the referencing report on their websites.

3.1.9 Qualification Certificates and Diplomas (criterion 10)

Information on the qualification's FiNQF level will be included in the documents issued by the awarding body. Stakeholders will receive guidance and advice on how to reference to the frameworks should appear on certificates or other possible documents, such as Certificate and Diploma Supplements. The Ministry of Education and Culture and the Finnish National Agency for Education will coordinate this task of informing stakeholders.

The Finnish National Agency for Education prepares regulations that concern the content of certificates issued for qualifications and syllabi for which the agency prepares core curricula or qualification requirements. These qualifications and syllabi include basic education, general upper secondary education, vocational upper secondary education qualifications, further vocational qualifications and specialist vocational qualifications. Some of these regulations were revised early in March 2017, following the adoption of the legislation that governs the qualifications framework and contain instructions on indicating the FiNQF level to which the qualification or syllabus is referenced and the corresponding EQF level. Revising the rest of the regulations continues.

The Ministry of Education and Culture assigned the Finnish National Agency for Education to advise higher education institutions in matters concerning Diploma Supplements in 1998. Currently, in its role as the National Europass Centre (NEC), the Finnish National Agency for

Education guides the higher education institutions on the Diploma Supplement references to qualifications frameworks. The guidelines for Diploma Supplements were revised in August 2017 to include information on how to indicate Bachelor, Master and Doctoral degrees' NQF and EQF levels.

The Finnish National Agency for Education also prepares the description of the Finnish education system for Certificate and Diploma Supplements. After the referencing and self-certification processes have been finished, these descriptions will also include text about the FiNQF and how the national levels relate to the EQF and EHEA Qualifications Frameworks levels.

The work involving certificate templates began after the legislation regarding FiNQF had entered into force.

It was then decided that all certificates will include reference to the relevant FiNQF level as well as the corresponding EQF level of the qualification awarded. More detailed information about the progress in this matter is given below (situation in March 2018).

The Finnish National Agency for Education is the body that issues regulations on the contents of certificates, including those issued upon completion of the basic education syllabus, the general upper secondary school syllabus, vocational upper secondary qualifications, further vocational qualifications and specialist vocational qualifications. The revised regulations shall give detailed instructions on the content of such certificates, including reference to the FiNQF levels as well as the corresponding EQF level of the qualification awarded.

Level 2

The regulation on certificates awarded upon completion of the basic education syllabus is already revised on the part that concerns basic education provided to adults and it will be finalised to include certificates issued to young people.

Levels 4 and 5

The regulation on certificate awarded for completion of the general upper secondary education syllabus is in preparation. The contents of certificates on vocational upper secondary education, further vocational qualifications and specialist vocational qualifications have been determined in a single regulation. This regulation gives detailed instructions on the content of such certificates, including reference to the FiNQF levels as well as the corresponding EQF level of the qualification awarded.

The certificate supplement prepared centrally at the Finnish National Agency for Education for each vocational qualification, also indicates the qualification's FiNQF level as well as the corresponding EQF level of the qualification awarded. The description of the Finnish system of education in Certificate Supplements was also revised in 2017.

Levels 6, 7 and 8

Graduates from Finnish higher education institutions receive a Diploma Supplement automatically. The Diploma supplement indicates both the FiNQF as well as the corresponding EQF level of the qualification awarded. The description of the Finnish system of education in Certificate Supplements was also revised in 2017.

3.2 The criteria and procedures for self-certification to the QF-EHEA

This chapter responds to the criteria and procedures set out in the Bologna Framework Working group's report to the European Ministers for Higher Education in Bergen in 2005 for verifying that the national framework is compatible with the overarching Framework for Qualifications of the European Higher Education Area (the EHEA Qualifications Framework, QF-EHEA). Since the criteria are partly the same, or at least they overlap, part of the answers has been given already in the chapter on referencing criteria. Below we will, when possible, give more specific answers and information concerning higher education qualifications and how the FiNQF responds to self-certification criteria and procedures.

3.2.1 Criteria for the compatibility of the FiNQF to the QF-EHEA

Responsible bodies

The development of the FiNQF, and the responsible bodies have been described in the introduction and in chapters 3.1.2 and 3.1.5. Already in 2004, the Ministry of Education and Culture set up a working group whose task was to draw up a description of the Finnish higher education qualifications framework. The proposed framework described Finnish higher education qualifications in terms of their work load, level, learning outcomes and the eligibility provided for further study. The learning outcomes were divided into knowledge, which was examined in terms of breadth and depth; language and communication skills; and competence, comprising cognitive, professional and ethical competence. Later this work was integrated to the development of a national qualifications framework comprising all qualification levels in the Finnish education system.

The Finnish Ministry of Education and Culture has responsibility for the FiNQF, including levels 6-8 that cover Finnish higher education qualifications. Finland has only one ministry whose responsibilities encompass all levels of education including early childhood education and care, youth, sports and culture. In 2009, the Ministry of Education and Culture asked the Finnish National Agency for Education to represent Finland in the network of National Correspondents for Qualifications Frameworks (QF-EHEA).

Supporting the implementation and providing information on the FiNQF, EQF and QF-EHEA as well as qualifications frameworks in other countries, will primarily be at the responsibility of

the Finnish National Agency for Education that functions both as the National Co-ordination Point (NCP) and as the National Correspondent for the EHEA.

Transparent procedures for inclusion of qualifications

Procedures for inclusion of qualifications to the FiNQF are described in chapter 3.1.5. As noted in the introduction, work involving for higher education qualifications begun already in 2004, and the results were later incorporated to the work on the FiNQF that covers all educational levels. In 2004 – 2005 when the universities of applied sciences, then called polytechnics, were still a relatively young type of higher education institution in Finland, the universities were somewhat hesitant about the idea of placing bachelor and master degrees from universities of applied sciences and universities at the same level in the national qualifications framework. Over the time, the opposing views were reconciled by discussing the matter, sharing information and further developing the descriptors for the relevant framework levels.

Link between descriptors, learning outcomes and ECTS credits

The Finnish higher education institutions started using the European Credit Transfer and Accumulation System (ECTS) compatible credits and grading scale in 2005. The change from the former system of measuring students' workload and performance was systematic and involved all higher education providers. Now the ECTS compatible credits are used in bachelor and master programmes provided by universities and universities of applied sciences. More information about credits in higher education qualifications can be found in the description of the Finnish education system (chapter 2.1.4). Although the FiNQF is not a credit based framework, the adoption of ECTS compatible credits has strengthened the link between Finnish higher education degrees and the QF-EHEA.

The level descriptors for levels 6-8 in the FiNQF are compatible with the Bologna level descriptors (Dublin descriptors). The Dublin Descriptors served as a benchmark for developing national descriptors for higher education qualifications in 2004 - 2005. The compatibility between EQF descriptors and QF-EHEA descriptors is stated also in the annexes of the EQF Recommendations.

In the following table, the QF-EHEA descriptions of the learning outcomes on level 6 (first cycle degrees) are presented side by side with the FiNQF descriptors.

QF-EHEA - Level 6	FiNQF - Level 6
<p>Qualifications that signify completion of the first cycle are awarded to students who:</p> <ul style="list-style-type: none"> • have <u>demonstrated knowledge and understanding</u> in a field of study that builds upon their general secondary education, and is typically at a level that, whilst supported by advanced textbooks, includes some aspects that will be informed by <u>knowledge of the forefront of their field of study</u>; • <u>can apply their knowledge and understanding in a manner that indicates a professional approach to their work or vocation, and have competences typically demonstrated through devising and sustaining arguments and solving problems within their field of study</u>; • have the ability to gather and interpret relevant data (usually within their field of study) to inform judgments that include <u>reflection on relevant social, scientific or ethical issues</u>; • can <u>communicate information, ideas, problems and solutions to both specialist and non-specialist audiences</u>; • have developed those <u>learning skills that are necessary for them to continue to undertake further study with a high degree of autonomy</u>. 	<p><u>Has a good command of comprehensive and advanced knowledge of his/her field, involving a critical understanding and appraisal of theories, key concepts, methods and principles.</u> Understands the extent and boundaries of professional functions and/or disciplines. Has advanced cognitive and practical skills, <u>demonstrating mastery of the issues and the ability to apply knowledge and find creative solutions</u> and applications required in a <u>specialised professional</u>, scientific or artistic field to <u>solve complex or unpredictable problems</u>.</p> <p>Works independently in expert tasks of the field and in international co-operation or as an entrepreneur. Manages complex professional activities or projects. Can make decisions in unpredictable operating environments. In addition to evaluating and developing his/her own competence, he/she takes responsibility for the development of individuals and groups.</p> <p>Has the ability for lifelong learning. <u>Considers communal and ethical aspects when dealing with different people in learning and working communities and other groups and networks. Communicates to a good standard verbally and in writing in his/her mother tongue both to audiences in the field and outside it.</u> Communicates and interacts in the second national language and is capable of international communication and interaction in his/her field in at least one foreign language.</p>

Table 3

On all levels of the FiNQF, the descriptors are general and the best fit principle is applied when placing qualifications to these levels. A qualification may contain elements that fit another level better than the one the qualification is referenced at. The placement of qualifications to the FiNQF levels is determined by the qualifications' learning outcomes. All levels of the FiNQF are open to different types of qualifications. Two examples of how learning outcomes are used as the basis for placement of qualifications can be found on levels 7 and 8 and are described below.

The example from level 7 is about master's degrees. Master's degrees awarded by universities of applied sciences are referenced at level 7, the same level as master's degrees awarded by universities, though these qualifications' orientation and the required extent of studies differ.

Master's degrees offered by universities of applied sciences are professionally oriented degrees that have a strong emphasis on professional development, which is reflected also in the admission criteria: three years' relevant work experience or artistic experience is a prerequisite for entry into these studies. At universities of applied sciences, the extent of master degree studies ranges from 60 to 90 ECTS, and the degrees includes a thesis with an extent of 30 ECTS. At universities, Bachelor's degree holders can continue directly to master studies, typically without a separate admission process. The extent of master's degree programmes at universities is 120 ECTS including a thesis with an extent of 20 to 40 ECTS.

The learning outcomes for level 7 in the FiNQF are very general partly because they apply to both types of master's degrees as well as to a broad range of disciplines. Naturally, certain aspects of the learning outcomes are more evident in the professionally oriented master's degrees and others in the academically oriented master's degrees. All in all, qualifications referenced at level 7 form a rather heterogeneous group, some of them prepare for a certain profession and others provide learning outcomes which are not linked to the pursuit of any specific profession. Also for this reason, a very general description of the learning outcomes was the only viable alternative when the level descriptors were drafted. The higher education institutions themselves prepare detailed, programme specific descriptions of learning outcomes that contain field specific information about the knowledge, skills and competence of graduates.

The examples from FINQF level 8 which illustrate how learning outcomes form the basis for placement of qualifications, are two qualifications that are not doctoral degrees, but are referenced at this level because their learning outcomes best fit the descriptions provided for this level. These qualifications are specialist training in medicine and specialist training in dentistry.

Before 2014, the Finnish system of higher education degrees comprised degrees both in the field of medicine and dentistry which had a similar function as the current specialist trainings - in the present system of higher education, the specialist trainings in medicine and dentistry have replaced these degrees. One of the reasons for this change was the distinct profile of these studies where the graduate is required to work in the profession while specialising, which makes the specialist trainings distinct from research degrees in other fields. Despite this change, the learning outcomes of these specialist trainings remained similar to the learning outcomes of third cycle degrees.

Quality assurance

Chapter 3.1.5 describes the Finnish quality assurance system in more detail.

Finnish higher education institutions are autonomous and legislation governing their quality assurance is broad. All Finnish higher education institutions are required by law to regularly participate in external evaluations of their activities and quality assurance systems. The institutions may choose which external evaluation body they ask to carry out the audit. The Finnish Education Evaluation Centre (FINEEC) is a national body that evaluates education of all levels, including education provided by universities and universities of applied sciences. They evaluate the quality systems that are in place in higher education institutions, conduct thematic evaluations of the education system and review degree programmes. The objectives of the QF-EHEA to improve qualifications' transparency, support lifelong learning, and mobility are shared by the higher education institutions in Finland. These aspects are given special emphasis when programmes of study are designed and revised. In January 2017, the FINEEC passed the external review conducted by the European Association for Quality Assurance in Higher Education (ENQA) and renewed its membership in ENQA and the European Quality Assurance Register for Higher Education (EQAR). In the periodic review conducted by the ENQA, FINEEC demonstrated compliance with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area.

FINEEC's audit model has been revised for the third round of audits to be organized in 2018-2024. The aim of the new audit model is to support higher education institutions in the continuous development of their operations, and to encourage internationalisation, experimenting and a creative atmosphere at higher education institutions. In the new audit model, there is a stronger emphasis on student-centred approach and societal impact. Furthermore, the audit round will accumulate open and transparent information on quality work at Finnish HEIs. Another central premise has been the autonomy of HEIs to develop their quality systems according to their own needs and goals. The autonomy and strategic development of higher education institutions is supported by the audit model which offers HEIs the possibility to select one of the areas of evaluation and a partner organisation from whose good practices in a specified target area the HEI could benefit.

The Finnish Education Evaluation Centre (FINEEC) has issued a formal statement on the government proposal for the FiNQF on 12.9.2017. In this statement, the FINEEC expressed their support to the proposed self-certification to the QF-EHEA.

3.2.2 Procedures for verifying the compatibility

Competent national bodies certifying the compatibility

In Finland, the competent national body to certify the compatibility of the FiNQF and more specifically, of its levels 6-8, with the QF-EHEA is the Ministry of Education and Culture. The ministry has been the initiator and coordinator in all phases in the development and implementation of the FiNQF and will continue to be so. The government proposal for an Act on the FiNQF has explained the main elements of the QF-EHEA as well as the compatibility between EQF and QF-EHEA.

International experts

The way the international experts participated in the self-certification and referencing processes is discussed in chapter 3.1.6.

Self-certification report

The combined referencing and self-certification report will be published online on the ENIC-NARIC Networks' website, and the Ministry of Education and Culture and the Finnish National Agency for Education websites. For wider national dissemination, the report will also be translated into Finnish and Swedish.

References in certificates

Certificates and other educational documents expressing qualifications framework levels (FiNQF, EQF, QF-EHEA) are discussed in chapter 3.1.9.

4 Future developments and challenges

4.1. Disseminating information

The Finnish Ministry of Education and the Finnish National Agency for Education will continue increase awareness of the FiNQF and perhaps most importantly, about the level descriptors. As described earlier, work on certificates and other educational documents will continue.

The Finnish National Agency for Education also maintains a portal (Studyinfo.fi) which contains information on programmes of study and about applying for studies. The information provided in this portal is designed to meet the needs of individual learners, education providers, officials and for example study counsellors. The portal also contains the requirements for all syllabi and qualifications which are prepared at the Finnish National Agency for Education (ePerusteet / eGrunder).

Providing the right kind of information to different audiences that supports the use of qualifications frameworks, requires careful planning and mapping of people's needs. This is challenging since the FiNQF is not considered to be a tool for change, but rather a tool that provides information and supports developing education in Finland in ways that place the focus on learning outcomes, increased mobility and improved access into further study. One of the specific challenges is to articulate that the framework does not describe the learning outcomes of an individual learner, but provides a general description of the type of knowledge, skills and competence the types of qualifications give.

The distinction between broadened and deepened knowledge is essential to make and needs to be articulated clearly to the users of the FiNQF, many of whom are not yet familiar with the concept of qualification frameworks and the way learning outcomes are analysed in them. Understanding, even on a general level, how the national qualifications framework connects with the European qualifications frameworks, the EQF and the QF-EHEA, is relevant for anyone using this tool.

In June 2017, an open seminar was organised by the Ministry of Education and Culture and the Finnish National Agency for Education in which education providers and other stakeholders were invited to discuss the newly adopted FiNQF. Afterwards, feedback was collected. The responses emphasized the need to make use of examples from other countries on how the public and stakeholders could best be informed about the framework. The respondents also suggested that the NCP should provide guidance to education providers as well as other relevant bodies on how they can further disseminate information about the FiNQF and concretize the idea behind the competence based classification of education, to students, for example. There was also interest towards the types of qualifications frameworks developed in other countries and how these frameworks are being used.

As a direct response to the seminar feedback, the NCP decided to organise another seminar in November 2017, one that is intended also for international participants. The purpose of this second seminar is to discuss the national qualifications frameworks which have been implemented in Iceland, Denmark, Finland, Norway and Sweden and to share experiences.

4.2. Opening the framework for other learning

The intention is that the framework will later be extended to a wider framework for learning by virtue of the Act 93/2017. The Ministry of Education and Culture will initiate further development work. The ministry appointed committee whose task will be to prepare a proposal for extending the framework has begun its work in March 2018.

Apart from specialist training in medicine and dentistry, the framework adopted in March 2017 does not encompass competence modules extending or consolidating qualifications that fall outside the national qualifications system. It was agreed that various preparatory and training programmes, studies that support study skills, competence modules related to eligibility and qualifications requirements, and competence modules aiming at development of competence and professional skills, would be assessed at a later phase with a view to possibly integrating them into the FiNQF. In view of this, some levels have been discussed on which to place certain preparatory trainings. These discussions were part of the process of designing the FiNQF and its levels. No formal action or measures have been taken yet.

The impulse and necessity to develop new competence modules or qualifications can arise directly from the needs of the labour market or from the anticipation activities which forecast the educational needs on a national level. When the requirements for new competence modules or qualifications are being prepared, the level descriptors help determine the appropriate level in the FiNQF on which the learning outcomes correspond to the identified educational needs. Identifying the appropriate FiNQF level also serves as an indication of the level in the education system to which the module or qualification belongs.

4.3. Changes in the qualifications system

Vocational education and training governed by the Ministry of Education and Culture will be reformed. This reform updates the entire vocational education and training (VET) by 2018. VET for young people and adults will be consolidated, forming a single entity with its own steering and regulation system and financing model. The current supply-oriented approach will be refocused into a demand-driven approach. Education will be competence-based and customer-oriented: Each student will be offered the possibility to design an individually appropriate path to finishing an entire qualification or a supplementary skill set. Most students enroll to vocational education and training through a flexible year-round admission system. The national joint application procedure organized each spring is meant primarily for comprehensive school graduates and other people without any vocational qualifications. In the future, education is regulated through a single authorization license granted by the

Ministry of Education and Culture, and education providers will have increased freedom in organizing their activities. A new funding model will be introduced to improve the effectiveness and quality of education and training. The funding model will encourage education providers to adopt measures to reduce discontinuation of studies and recognize previously acquired skills more efficiently.

The changes brought on by the reform to vocational qualifications will be carried out in 2018 - 2019. The reform includes a revision of the qualification structure and qualification requirements. The current three-tier qualification structure (vocational upper secondary qualification, further vocational qualification, and specialist vocational qualification) is retained. In future the qualifications are, however, more broad-based, and there would be no need to create new qualifications if new competence needs arose. The number of qualifications will decrease from the current 360 to 160. Students would have more freedom of choice within a specific qualification than nowadays. Students' performance and competence are - in all vocational qualifications - shown by demonstrating them in an actual, practical work situation. Students' performance is assessed together by teachers and experts in working life.

The FiNQF is a living framework that will be reviewed and updated, when necessary. The descriptors for all levels are broad and designed to facilitate qualifications of differing orientations, and for this reason it is anticipated that the need to revise descriptors would occur rather seldom. The need for updates can arise from for instance revisions in the education system, changes made to the qualification structure, based on the needs of the working life, or the qualification requirements. The Ministry of Education and Culture and the Finnish National Agency for Education share the responsibility for the further development of the FiNQF.

The FiNQF level descriptors are based on the current qualifications and their learning outcomes. Due to the reform, the descriptors will have to be revisited and if necessary, revised. When the FiNQF level descriptors are changed or new qualifications or competence modules are included, an updated version of this report will be presented to the EQF Advisory Group.

We consider that many, if not all, of the central elements required by qualifications frameworks (access, mobility, learning outcomes, recognition of prior learning) are already well integrated and in place in Finland – and further implemented and promoted in different educational and labour market contexts. This is a good situation, but also a challenge when it comes to the awareness of the FiNQF and to stakeholders' commitment to it. On the other hand, time will show how strong a tool the FiNQF will prove in terms of added value to its users and what kind of new opportunities it may provide.

In all cases, the commitment to promote the central elements and building blocks of qualifications frameworks is strong in Finland.

Annexes

Annex 1: EQF, QF-EHEA and FiNQF level descriptors side by side and qualifications referenced to the FiNQF

	EQF	FiNQF	Qualifications in FiNQF
1	<p>Basic general knowledge</p> <p>Basic skills required to carry out simple tasks</p> <p>Work or study under direct supervision in a structured context</p>	<p>Has a good command of the general knowledge and basic skills required for study and for carrying out simple tasks in a structured context under direct supervision.</p> <p>Takes responsibility for his/her learning under guidance. Communicates verbally and responds to simple written communication in his/her mother tongue.</p>	
2	<p>Basic factual knowledge of a field of work or study</p> <p>Basic cognitive and practical skills required to use relevant information in order to carry out tasks and to solve routine problems using simple rules and tools</p> <p>Work or study under supervision with some autonomy</p>	<p>Has a good command of diverse general knowledge and the basic cognitive and practical skills that are required for making use of such knowledge when carrying out tasks and solving problems. Follows rules and uses diverse equipment and tools in a supervised operating environment demanding autonomy.</p> <p>Takes responsibility and shows initiative.</p> <p>Takes responsibility for his/her learning. Has the ability for lifelong learning. Knows how to work in a familiar learning and work community. Communicates diversely and interactively in different situations and produces texts in his/her mother tongue. Has the capability to interact in the second national language and at least one foreign language.</p>	Basic education certificate / syllabus
3	<p>Knowledge of facts, principles, processes and general concepts, in a field of work or study</p> <p>A range of cognitive and practical skills required to accomplish tasks and solve problems by selecting and applying basic methods, tools, materials and information</p> <p>Take responsibility for completion of tasks in work or study; adapt own behaviour to circumstances in solving problems</p>	<p>Has a good command of the knowledge base, principles, processes and general concepts in his/her field of work or study as well as certain cognitive and practical skills required for carrying out tasks and solving problems. Chooses and applies basic methods, tools, materials and information. Adapts his/her actions to the circumstances and the operating environment when solving problems.</p> <p>Takes responsibility for completion of his/her tasks and works safely within a working or learning community. Has the ability to perform his/her tasks in a responsible manner showing initiative. Understands the significance of working life and entrepreneurship to individuals and society. Evaluates his/her own competence and actions, skills and choices pertaining to work or studies.</p> <p>Has the ability for lifelong learning. Knows how to work in a familiar learning and work community. Communicates diversely and interactively in different situations and produces varied texts in his/her mother tongue. Has the ability to interact in the second national language and at least one foreign language, also internationally.</p>	

	EQF	FiNQF	Qualifications in FiNQF
4	<p>Factual and theoretical knowledge in broad contexts within a field of work or study</p> <p>A range of cognitive and practical skills required to generate solutions to specific problems in a field of work or study</p> <p>Exercise self-management within the guidelines of work or study contexts that are usually predictable, but are subject to change; supervise the routine work of others, taking some responsibility for the evaluation and improvement of work or study activities</p>	<p>Has a good command of the knowledge base of his/her field of work or study in broad contexts in and certain cognitive and practical skills as well as expression skills, and makes use of such knowledge and skills when solving problems specific to his/her field and carrying out tasks in the field. Works independently in operating environments that are usually predictable, but are subject to change.</p> <p>Takes responsibility for completion of his/her tasks and works safely and responsibly within a work community. Works in an economical, productive and systematic manner, and organises his/her work taking other actors into consideration. Is able to supervise routine tasks performed by others. Has the ability to work in an entrepreneurial manner in someone else's service or as an independent entrepreneur in the field. Evaluates his/her competence and scope of duties and improves actions relating to work or studies. Develops himself/herself and his/her work.</p> <p>Has the ability for lifelong learning. Acts in a way that complies with ethical principles when interacting with different people in learning and working communities and other groups and networks. Communicates diversely and interactively in different situations and produces varied and also field-specific texts in his/her mother tongue. Communicates in the second national language and interacts in his own field in at least one foreign language, also internationally.</p>	<p>General upper secondary education certificate / syllabus</p> <p>Matriculation examination</p> <p>Vocational upper secondary qualifications</p> <p>Further vocational qualifications</p> <p>Basic Examination in Prison Services</p> <p>Fire Fighter Qualification</p> <p>Emergency Response Centre Operator Qualification</p>
5	<p>Comprehensive, specialised, factual and theoretical knowledge within a field of work or study and an awareness of the boundaries of that knowledge</p> <p>A comprehensive range of cognitive and practical skills required to develop creative solutions to abstract problems</p> <p>Exercise management and supervision in contexts of work or study activities where there is unpredictable change; review and develop performance of self and others</p>	<p>Has a good command of the comprehensive and/or specialised knowledge in his/her field and cognitive and practical skills and expression skills and makes use of such knowledge and skills when solving abstract problems creatively and performing tasks in the field. Understands the links between scopes of professional duties, his/her field and other fields, and how these connect with the big picture.</p> <p>Functions as a specialist in his/her field and develops operations, products and/or services. When necessary, manages and supervises operating environments and operations that change unpredictably. Guides others and supervises tasks performed by others. Is well-prepared for working as an independent entrepreneur in the field. Evaluates and develops his/her own as well as others' performance and work.</p> <p>Has the ability for lifelong learning. Acts in a way that complies with ethical principles when dealing with different people in learning and working communities and other groups and networks. Communicates verbally and in writing in his/her mother tongue both to audiences in the field and outside it. Communicates in the second national language and interacts in his/her own field in at least one foreign language, also internationally.</p>	<p>Specialist vocational qualifications</p> <p>Sub-Officer Qualification (Fire and Rescue Services)</p> <p>Vocational Qualification in Air Traffic Control</p>

	EQF & QF-EHEA	FiNQF	Qualifications in FiNQF
6	<p>EQF Advanced knowledge of a field of work or study, involving a critical understanding of theories and principles</p> <p>Advanced skills, demonstrating mastery and innovation, required to solve complex and unpredictable problems in a specialised field of work or study</p> <p>Manage complex technical or professional activities or projects, taking responsibility for decision-making in unpredictable work or study contexts; take responsibility for managing professional development of individuals and groups</p> <p>-- QF-EHEA <i>Qualifications that signify completion of the first cycle are awarded to students who:</i></p> <ul style="list-style-type: none"> • have demonstrated knowledge and understanding in a field of study that builds upon their general secondary education, and is typically at a level that, whilst supported by advanced textbooks, includes some aspects that will be informed by knowledge of the forefront of their field of study; • can apply their knowledge and understanding in a manner that indicates a professional approach to their work or vocation, and have competences typically demonstrated through devising and sustaining arguments and solving problems within their field of study; • have the ability to gather and interpret relevant data (usually within their field of study) to inform judgments that include reflection on relevant social, scientific or ethical issues; • can communicate information, ideas, problems and solutions to both specialist and non-specialist audiences; • have developed those learning skills that are necessary for them to continue to undertake further study with a high degree of autonomy. 	<p>Has a good command of comprehensive and advanced knowledge of his/her field, involving a critical understanding and appraisal of theories, key concepts, methods and principles. Understands the extent and boundaries of professional functions and/or disciplines. Has advanced cognitive and practical skills, demonstrating mastery of the issues and the ability to apply knowledge and find creative solutions and applications required in a specialised professional, scientific or artistic field to solve complex or unpredictable problems.</p> <p>Works independently in expert tasks of the field and in international co-operation or as an entrepreneur. Manages complex professional activities or projects. Can make decisions in unpredictable operating environments. In addition to evaluating and developing his/her own competence, he/she takes responsibility for the development of individuals and groups.</p> <p>Has the ability for lifelong learning. Considers communal and ethical aspects when dealing with different people in learning and working communities and other groups and networks. Communicates to a good standard verbally and in writing in his/her mother tongue both to audiences in the field and outside it. Communicates and interacts in the second national language and is capable of international communication and interaction in his/her field in at least one foreign language.</p>	<p>Bachelor's degrees (universities of applied sciences)</p> <p>Bachelor's degrees (universities)</p>

	EQF & QF-EHEA	FiNQF	Qualifications in FiNQF
7	<p>EQF Highly specialised knowledge, some of which is at the forefront of knowledge in a field of work or study, as the basis for original thinking and/or research</p> <p>Critical awareness of knowledge issues in a field and at the interface between different fields</p> <p>--</p> <p>QF-EHEA <i>Qualifications that signify completion of the second cycle are awarded to students who:</i></p> <ul style="list-style-type: none"> • have demonstrated knowledge and understanding that is founded upon and extends and/or enhances that typically associated with the first cycle, and that provides a basis or opportunity for originality in developing and/or applying ideas, often within a research context; • can apply their knowledge and understanding, and problem solving abilities in new or unfamiliar environments within broader (or multidisciplinary) contexts related to their field of study; • have the ability to integrate knowledge and handle complexity, and formulate judgments with incomplete or limited information, but that include reflecting on social and ethical responsibilities linked to the application of their knowledge and judgments; • can communicate their conclusions, and the knowledge and rationale underpinning these, to specialist and non-specialist audiences clearly and unambiguously; • have the learning skills to allow them to continue to study in a manner that may be largely self-directed or autonomous. 	<p>Understands comprehensive and highly specialised concepts, methods and knowledge corresponding to the specialised competence in his/her field, which are used as the basis for independent thinking and/or research. Understands issues that are at the interface between his/her field and different fields and evaluates them and new knowledge critically. Solves demanding problems, also creatively, in research and/or innovation, which develop new knowledge and procedures and applies and combines knowledge from various fields.</p> <p>Works independently in demanding expert tasks of the field and in international co-operation or as an entrepreneur. Manages and develops complex, unpredictable and new strategic approaches. Manages things and/or people. Evaluates the activities of individuals and groups.</p> <p>Accumulates knowledge and practices in his/her field and/or takes responsibility for the development of others.</p> <p>Has the ability for lifelong learning. Considers communal and ethical aspects when dealing with different people in learning and working communities and other groups and networks. Communicates to a good standard verbally and in writing in his/her mother tongue both to audiences in the field and outside it. Communicates and interacts in the second national language and is capable of demanding international communication and interaction in his/her field in at least one foreign language.</p>	<p>Master's degrees (universities of applied sciences)</p> <p>Master's degrees (universities)</p>

	EQF & QF-EHEA	FiNQF	Qualifications in FiNQF
8	<p>EQF Knowledge at the most advanced frontier of a field of work or study and at the interface between fields</p> <p>The most advanced and specialised skills and techniques, including synthesis and evaluation, required to solve critical problems in research and/or innovation and to extend and redefine existing knowledge or professional practice</p> <p>Demonstrate substantial authority, innovation, autonomy, scholarly and professional integrity and sustained commitment to the development of new ideas or processes at the forefront of work or study contexts including research</p> <p>--</p> <p>QF-EHEA <i>Qualifications that signify completion of the third cycle are awarded to students who:</i></p> <ul style="list-style-type: none"> • have demonstrated a systematic understanding of a field of study and mastery of the skills and methods of research associated with that field; • have demonstrated the ability to conceive, design, implement and adapt a substantial process of research with scholarly integrity; • have made a contribution through original research that extends the frontier of knowledge by developing a substantial body of work, some of which merits national or international refereed publication; • are capable of critical analysis, evaluation and synthesis of new and complex ideas; • can communicate with their peers, the larger scholarly community and with society in general about their areas of expertise; • can be expected to be able to promote, within academic and professional contexts, technological, social or cultural advancement in a knowledge based society. 	<p>Has a good command of extensive knowledge areas and contexts. Masters the most advanced and/or specialised and most profound knowledge, skills and/or theories, which are placed at the most advanced and/or specialised level of the field and at the interface between different fields. Finds creative solutions. Creates new knowledge in compliance with good scientific practice. Conducts independent and reliable scientific or artistic and professional research. Develops professional functions and/or his/her scientific or artistic field. Develops and applies new ideas, theories, approaches or processes in the most advanced operating environments.</p> <p>Works independently in the most demanding expert tasks of the field and in international co-operation or as an entrepreneur. Manages things and/or people. Synthesises and prepares critical evaluations required to solve complex problems in research and/or innovation. Extends and redefines knowledge or professional practices.</p> <p>Accumulates knowledge in his/her field and/or takes responsibility for the development of others.</p> <p>Has the ability for lifelong learning. Considers communal and ethical aspects when dealing with different people in learning and working communities and other groups and networks. Communicates to a good standard verbally and in writing in his/her mother tongue both to the scientific community and the general public on issues pertaining to his/her own research area and the entire discipline and/or professional field. Communicates and interacts in the second national language and is capable of demanding international communication and interaction in his/her field in at least one foreign language.</p>	<p>Universities' and National Defence University's scientific and artistic postgraduate degrees (licentiate and doctoral degrees)</p> <p>General Staff Officer's Degree</p> <p>Specialist Degree in Veterinary Medicine</p> <p>Specialist training in medicine</p> <p>Specialist training in dentistry</p>

Annex 2: The international experts' commentaries on the report

Stefan Skimutis' commentary

Comments on the Finnish reference report showing the link between the Finnish Qualifications Framework, FiNQF, and the European Reference Framework, EQF

The report is exemplary short, easy to read and has a good structure that I judge also applies to readers outside the Nordic countries.

The Finnish constitution-based education system provides many opportunities for students to choose their education path, as the education system has no deadlines, which have been well described in the report.

The FiNQF level only the qualifications obtained through the Finnish constitution-based education system, which is weakness, since the thought of national reference frameworks and the European Reference Framework should include all qualifications no matter how the qualifications have been obtained. However, the report states that it intends to open FiNQF for level placement of qualifications even outside the Finnish education system, which is positive.

The reference report includes EHEA QF self-certification, which is positive here the higher education qualifications are then handled in the same way as other qualifications level in the FiNQF.

The term syllabi / syllabus (page 5) used on level 2 and 4 in FiNQF makes me a bit confused. A qualification framework should visualize the outcome of learning, ie the degree, diploma, certificate, etc., which is the proof that an individual can know and understand after a certain learning regardless of how the learning has been conducted. Syllabus / syllabus is for me the way to a qualification not the qualification itself.

FiNQF does not use the EQF headings for the descriptors or other headers for descriptors. My assessment is that national reference frameworks have their greatest use nationally, so even in Finland. The fact that Finland chose not to use the EQF headings for the descriptors has been well described on page 19. Nationally, FiNQF's strength is to adapt the reference framework to the country's stakeholders, but internationally, it is weakness - transparency weakens somewhat. The future may reveal whether it is a disadvantage or advantage that the descriptors headlines look different internationally.

Criterion 3 - This clearly illustrates the fact that the Finnish Reference Framework complies with the Learning Outcomes Principle regarding the levelling of constitutional qualifications. Bachelor's degrees (universities) are both levelled at FiNQF level 6, where Bachelor's degrees (universities of applied sciences) do not lead to an academic qualification which Bachelor's degrees (universities) do.

My final assessment is that the reference report meets all the requirements that are required to demonstrate how the Finnish Qualifications Framework, FiNQF, is linked to the European Reference Framework, EQF.

Västerås 2017-10-26

Stefan Skimutis

Former representative of the Swedish NCP, now in depended consult in qualifications and education.

Eduard Staudecker's commentary

The report describes in a pragmatic and clear way the development and implementation of the Finnish National Framework for Qualifications and other Competence Modules. It is obvious that this report at the end of 2017 is the result of a long political process and it must be stated here that this is a success for all stakeholders in Finland (and Europe) who are convinced that such a framework brings more transparency and cooperation.

Especially the chart on page 5 gives a good overview which qualifications are included at the moment. The chart shows basic general education and the matriculation examination (on level 2 and 4), VET qualifications on level 4 and 5, and HE qualifications on 6 – 8. When adding the chart on page 7, where the system is described in detail the reader gets a comprehensive overview on the qualifications system in Finland. The only overlap of systems occurs at level 4 where VET and general education can be compared. In this context some comments: The widely known terminus “Polytechnicals” is not used in the chart, which could be clarified; the terminus syllabi is consequently used but not specified enough for which qualifications the terminus is applied. These minor points should be elaborated.

It is of high interest for all European countries to see that Policemen/-woman or qualifications in prison or probation service are HE qualifications in Finland. Thus some statistical data and figures would give more insight in this topic, also with a view to the HE attainment benchmark in EU2020.

All criteria are answered sufficiently and from an external view all criteria are fulfilled. The link to the Finnish credit system is very interesting and gives a new view – even the framework is not a credit framework. In this context some basic examples would have been a benefit.

With a view to criterion 4 – referencing process – the work was done on a high level of national consultation and with high political support. This is for a first step very acknowledgeable. On the other hand a stable long term referencing procedure (e.g. for new qualifications) is not detectable at the moment. Especially when it comes to “other competence modules” the report is rather vague and open.

In this context a general weakness should be mentioned. The report gives a very good insight in the formal education system but remains rather open when it comes to e.g. qualifications from other (non-state) education providers. Also the approach to grasp informal learning could be deepened in the report.

Finally again the efforts and work must have been enormous because of the long time period and that is why this report is a very positive step in European Union politics and also a big step towards the common goal of a (complete) European qualifications framework.

Eduard Staudecker

Member of the EQF Advisory Group, CEO of the Austrian NQF steering group, employed at the Ministry of Education and Women's Affairs in Austria

Annex 3: Relevant legislation and other references

Basic Education Act (628/1998; *perusopetuslaki / lag om grundläggande utbildning*)

Basic Education Decree (852/1998; *perusopetusasetus / förordning om grundläggande utbildning*)

Decree on national objectives and distribution of teaching hours in basic education (422/2012; *Valtioneuvoston asetus perusopetuslaissa tarkoitettun opetuksen valtakunnallisista tavoitteista ja perusopetuksen tuntijaosta / Statsrådets förordning om riksomfattande mål för utbildningen enligt lagen om grundläggande utbildning och om timfördelning i den grundläggande utbildningen*)

General Upper Secondary Schools Act (629/1998; *lukiolaki / gymnasielag*)

General Upper Secondary Schools Decree (810/1998; *lukioasetus / gymnasieförordning*)

Government Decree on the General National Objectives of General Upper Secondary Education and the Distribution of Lesson Hours (942/2014; *Valtioneuvoston asetus lukiolaissa tarkoitettun koulutuksen yleisistä valtakunnallisista tavoitteista ja tuntijaosta / Statsrådets förordning om de allmänna riksomfattande målen för och timfördelningen i den utbildning som avses i gymnasielagen*)

National Matriculation Examination Act (672/2005; *laki ylioppilastutkinnon järjestämisestä / lag om anordnande av studentexamen*)

Vocational Education and Training Act (630/1998; *laki ammatillisesta koulutuksesta / lag om grundläggande yrkesutbildning*)

Vocational Adult Education Act (631/1998; *laki ammatillisesta aikuiskoulutuksesta / lag om yrkesinriktad vuxenutbildning*)

Act on Universities of Applied Sciences (932/2014; *ammattikorkeakoululaki / yrkeshögskolelag*)

Government Decree on Universities of Applied Sciences (1129/2014; *Valtioneuvoston asetus ammattikorkeakouluista / Statsrådets förordning om yrkeshögskolor*)

Universities Act (558/2009; *yliopistolaki / universitetslag*)

Government Decree on University Degrees and Specialist Education (794/2004; *Valtioneuvoston asetus yliopistojen tutkinnoista / Statsrådets förordning om universitetsexamina*)

Government Decree regarding specialist degrees in veterinary medicine and the right to practice as a specialised veterinary surgeon (275/2000; *Valtioneuvoston asetus erikoiseläinlääkäriin tutkinnoista ja oikeudesta toimia erikoiseläinlääkäreinä / Statsrådets förordning om specialveterinärexamen och rätten att vara verksam som specialveterinär*)

Act on Health Care Professionals (559/1994; *laki terveydenhuollon ammattihenkilöistä / lag om yrkesutbildade personer inom hälso- och sjukvården*)

Ministry of Social Affairs and Health Decree on the Training of Specialist Physicians and Dentists (56/2015; *Sosiaali- ja terveystieteiden ministeriön asetus erikoislääkäri- ja erikoishammaslääkärikoulutuksesta sekä yleislääketieteen erityiskoulutuksesta / Social- och hälsovårdsministeriets förordning om specialistläkarutbildning och specialisttandläkarutbildning samt om särskild allmänläkarutbildning*)
National Defence University Act (1121/2008; *laki Maanpuolustuskorkeakoulusta / lag om Försvarshögskolan*)

Decree on the Higher Education Degree System (464/1998; *asetus korkeakoulututkintojen järjestelmästä / förordning om högskolornas examenssystem*)

Government Decree on the National Defence University (1124/2008; *Valtioneuvoston asetus Maanpuolustuskorkeakoulusta / Statsrådets förordning om Försvarshögskolan*)

Border Guard Administration Act (577/2005; *laki rajavartiolaitoksen hallinnosta / lag om gränsbevakningsväsendets förvaltning*)

Government Decree on the Border Guard (651/2005; *Valtioneuvoston asetus rajavartiolaitoksesta / Statsrådets förordning om gränsbevakningsväsendet*)

Act on the Training Institute for Prison and Probation Services (1316/2006; *laki Rikosseuraamusalan koulutuskeskuksesta / lag om Brottspåföljdsområdets utbildningscentral*)

Government Decree on the Training Institute for Prison and Probation Services (1448/2006; *valtioneuvoston asetus Rikosseuraamusalan koulutuskeskuksesta / Statsrådets förordning om Brottspåföljdsområdets utbildningscentral*)

Act on the Police University College (1164/2013; *laki Poliisiammattikorkeakoulusta / lag om Polisyrkeshögskolan*)

Government Decree on the Police University College (282/2014; *Valtioneuvoston asetus Poliisiammattikorkeakoulusta / Statsrådets förordning om Polisyrkeshögskolan*)

Act on the Emergency Services College (607/2006; *laki Pelastusopistosta / lag om Räddningsinstitutet*)

Government Decree on the Emergency Services College (658/2006; *Valtioneuvoston asetus Pelastusopistosta / Statsrådets förordning om Räddningsinstitutet*)

Act on National Certificates of Language Proficiency (964/2004; *laki yleisistä kielitutkinnoista / lag om allmänna språkexamina*)

Communiqué of the Conference of Ministers responsible for Higher Education in Berlin on 19 September 2003: “Realising the European Higher Education Area”

Finnish National Agency for Education, qualification requirements for vocational upper secondary qualifications (in English and Swedish):

- www.oph.fi/english/curricula_and_qualifications/vocational_upper_secondary_education
- <http://www.oph.fi/yrkesutbildning/>

Finnish National Agency for Education, requirements for qualifications and syllabi (*ePerusteet / eGrunder*) — <https://eperusteet.opintopolku.fi/#/fi>

National Europass Centre (NEC) — www.europassi.fi

National framework for qualifications and other learning, Reports of the Ministry of Education 2009:24

Finnish National Agency for Education’s portal on programmes of study
— www.studyinfo.fi